

April 11, 2025

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Sent Via Email

Dear Hon. Premier and Ministers:

Re. Installation of New Utility Poles in Howick Township through the Accelerated High Speed Internet Project (AHSIP)

It is with great concern that we provide a connectivity update from the perspective of the Township of Howick. The Township applauds the provincial government for its \$4 billion investment to provide high-speed internet access in every region of Ontario and is appreciative of the Ministry of Infrastructure's leadership with the Accelerated High Speed Internet Program (AHSIP).

Improved connectivity to Ontario's unserved and underserved areas creates immense economic development opportunities and begins to address some of the challenges experienced by rural and remote communities. These communities continue to experience profound inequities in the areas of education, business and interpersonal relationships due to the lack of adequate communications infrastructure. The buildout of new broadband infrastructure starts the work towards resolving this inequity.

The Township of Howick is a small, rural municipality with a rich and proud history in agriculture. Through AHSIP, Xplore Inc. has obtained \$1.6 billion of private investment and government funding for fibre network expansion in several underserved, rural Ontario communities, including Howick Township.

While Howick Township is supportive of all rural residents receiving access to reliable high-speed internet, there are ongoing concerns from Council and residents over the installation of dozens of new utility poles within the municipal right-of-way across Howick's countryside instead of utilizing Hydro One's existing utility poles or underground direct bury or drilling methods.

In response to our inquiries, representatives from Xplore Inc. have explained to township council and staff that these new utility poles have been installed by their subcontractor because of "significant delays in Hydro One's permitting process to add broadband infrastructure to their existing utility poles and because it is the most cost-effective installation method."

The Ministry of Infrastructure outlines very thorough processes, procedures and timelines for Attaching to LDC-Owned Poles in the *Building Broadband Faster in Ontario* guidelines released November 30, 2021. Section 2.2 of the guideline outlines the Broadband One Window (BOW) authorization process for LDC owned pole attachments, including the engineering design requirements as well as the applicable standards to which stakeholders are expected to adhere to. This process includes field inspection/survey of the poles, pole loading structural analysis and determination of what telecom and power make-ready work, if any, needs to be completed for safe attachment. Nowhere in the guidelines does the Ministry of Infrastructure outline a process for installing new utility poles instead of attaching to existing LDC owned poles.

This leave us in Howick Township with several questions:

What guidelines are being followed if this ISP is completely bypassing the LDC in favor of erecting new utility poles? Is the Ministry of Infrastructure responsible for making sure these guidelines and processes are being followed? If Xplore Inc. has admitted to avoiding the permitting process of using the LDC's (Hydro One) existing utility poles, who owns these new utility poles that have been installed? Who is responsible for their maintenance and eventual replacement? Who is going to maintain the brush and shrubbery that surround many of these new poles in the municipal right-of-way?

It is Howick Township's opinion that the AHSIP program lacks oversight and compliance measures over the work being completed by the Internet Service Providers and their sub-contractors. Along with this, the *Building Broadband Faster Act, 2021, S.O. 2021, c.2*,

Cc: (via email)
Association of Municipalities of Ontario
All Ontario municipalities
Huron County Federation of Agriculture

Sched. 1 has stripped Howick Township's right to question the installation of dozens of new utility poles without incurring financial penalties for causing delays to the project.

We have included photos (see [Appendix A](#)) of the substandard installation of new utility poles across Howick Township under AHSIP that occurred throughout this past winter. As you can see, many poles were installed incorrectly, quickly and during all weather conditions. This required the sub-contractors to return several times to fix deficiencies. This doesn't seem like the most cost-effective installation method. Other photos show examples of the number of new poles installed in areas of Howick Township. With our primarily agriculture-based background and economy, many Howick Township landowners are quite upset with the amount of new utility poles that have been installed. Farm equipment continues to get larger in size as farming techniques modernize, and these new 30ft utility poles limit access to fields with overhead infrastructure installed along the municipal right-of-way.

Through our research into this matter, we have not found examples of so many new utility poles being installed elsewhere across the province to facilitate the installation of fibre optic high-speed internet infrastructure. New pole installations are only referenced in the program guidelines regarding LDC-owned poles requiring replacement prior to installing the broadband infrastructure.


Can you explain why so many new utility poles are being installed in Howick Township directly by the ISP instead of utilizing existing utility poles owned by Hydro One as outlined in your program guidelines? Municipalities were not informed that dozens of new utility poles would be installed through AHSIP. Howick Township is requesting to have these new utility poles removed in favour of utilizing existing LDC owned poles or direct bury or plowing methods of installation.

We encourage any other Ontario municipalities who are experiencing similar new utility pole installations through the Accelerated High Speed Internet Program to reach out to Howick Township directly, and to join Howick Township by reaching out to the above listed ministries with your concerns.

Thank you for your consideration on this matter.

Please do not hesitate to contact us if you have any questions.

Yours sincerely,



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Appendix A - New Utility Poles in Howick Township













