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September 20, 2021

Andre Arbour
Acting Director General, Telecommunications and Internet Policy Branch
Innovation, Science and Economic Development Canada
235 Queen Street, 10th Floor
Ottawa, Ontario K1A 0H5
Via email: telecomsubmission-soumissiontelecom@ised-isde.gc.ca

Re: Canada Gazette, Part I, July 24, 2021, Petitions to the Governor in Council concerning Telecom Decision CRTC 2021-181 (Notice No. TIPB-002-2021)

Dear Mr. Arbour,

On behalf of the Association of Manitoba Municipalities (AMM), which represents all of Manitoba's 137 municipalities, I am writing to reiterate our previous comments (enclosed) about the recent decision by the Canadian Radio-Television and Telecommunications Commission (CRTC) that affects Canada's Internet reseller regime.

Greater wireless and broadband Internet access has the power to transform rural Canada, as connectivity is now as important as building and maintaining roads and bridges in rural, remote, and northern communities. That is why the AMM believes that it is critically important for all Manitoba municipalities to have access to high-speed internet as local Councils strive to grow their communities as well as create an environment that improves the competitiveness of local businesses and maximizes job opportunities.

The AMM has been informed by industry stakeholders that a recent petition to Cabinet to overturn the CRTC's decision affecting Canada's Internet reseller regime could adversely impact the expansion of broadband Internet to rural, remote and northern communities and increase the digital divide that currently exists between urban and rural Canada. Additionally, industry stakeholders have also indicated the petition could cause Canada to fall behind other countries in terms of broadband speed, which will affect the ability of our members to create linkages with an increasingly global and digital economy.

Specifically, the AMM encourages the Cabinet and CRTC to maintain its current position on Third Party Internet Access as we feel the 2021 ruling correctly considered:

- A rural lens to the decision to ensure that the wholesale rates set by the CRTC do not adversely impact investment by network owners in the expansion of networks in rural and remote communities to ensure Canada meets our ambitious broadband targets.





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- An economic development lens to the decision to ensure that wholesale rates do not adversely impact investments required to keep Canada in the top ten internet speeds on world indices.

Access to high-speed Internet is critically important for Canada's economic and social well-being, particularly as we look to collectively recover from the COVID-19 pandemic, and it is essential that the CRTC gets this decision right and Internet providers maximize investments in local communities.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Denys Volkov". The signature is stylized and includes a long horizontal flourish extending to the right.

Denys Volkov
Executive Director

