

September 22, 2021

Via e-mail: telecomsubmission-soumissiontelecom@ised-isde.gc.ca

Director General
Telecommunications and Internet Policy Branch
Innovation, Science and Economic Development Canada
235 Queen Street, 10th Floor
Ottawa, Ontario K1A 0H5

Re: Competitive Network Operators of Canada petition to the Governor in Council

Canada Gazette, Part I, Vol. 155, No. 30, July 24, 2021, Notice No. TIPB-002-2021 — Petitions to the Governor in Council concerning Telecom Decision CRTC 2021-181

Dear Mr. Arbour:

We write this letter **in full support** for the above-referenced petition to Cabinet submitted by the Competitive Network Operators of Canada (“CNOOC”).

About CIK TELECOM INC

We are a member of CNOOC, the voice of competitive Internet and telecommunications service providers that own/operate telecommunications networks in regions across Canada.

We are providing high speed internet, Home phone and IP TV in 6 Provinces from east to west including Ontario, Quebec, Manitoba, Saskatchewan, Alberta and BC.

How Telecom Decision CRTC 2021-181 harms CIK TELECOM INC.

As one of the largest Independent Internet providers in Canada, we are not only reselling Cableco and Teleco service, from 2016, we started investing on building our own facilities. We already built our own FTTP to over 30,000 units in MDU from 2016 and was expecting huge refund by implementing 2019-288 and invest more on Fiber to Home to houses and also expand our network to east of Canada including PEI, NB and Nova scotia.

However the unexpected big change of CRTC 2021-181 completely hurt our investment plan in our network expanding. We have to suspend our expending to east coast even we already paid Eastlink and Rogers already. We also downsize our initial investment plan to spend up to 300M to build FTTH to cover all Markham area. At the same time, our entire FTTH ongoing at Gravenhurst has been suspended as well although we have bought the land to build the POP and finished fiber network design.

Beside losing the refund for facility investment, in the new decision, CRTC even raised the rates for some of most popular speeds such as 150M on Rogers from 34\$ to 49\$, Videotron 100M from 28\$ to 37\$. This is causing we are not able to compete with Rogers/Fido and Videotron/Fizz as they are selling below our cost. We are losing hundreds of customer per month right now and no any profit we can use to invest on facility.

Conclusion

CRTC decision in 2021-181 doesn't make sense at all.

As CRTC mentioned they want to encourage facility-based competition, why do they give the money to smaller ISPs like us to invest on facility so that we can compete with big teleco and Cableco as we are more efficient than them. It looks CRTC doesn't want competition at all so the big teleco and Cableco is creating faked competition

and controlling market price while they can keep very high profit. CRTC can not simply ignore the 2019-288 which is based on cost analysis they spent 3 years to make.

We strongly request Cabinet to get involved to review and overturn 2021-181 using 2019-288 so that smaller ISPs can have money to invest on facilities so we can maintain lower internet rates to benefit all Canadians driven by healthy competition and have a long term growth.

Yours very truly,

Jordan Deng

CEO

CIK TELECOM INC

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ON, L3R 5G5.

Cc: The Honourable Minister of Innovation, Science and Industry
(by email, ISI.minister-ministre.ISI@canada.ca)
Andre Arbour, Acting Director General Telecommunications and Internet Policy Branch
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