



Via email: [telecomsubmission-soumissiontelecom@ised-isde.gc.ca](mailto:telecomsubmission-soumissiontelecom@ised-isde.gc.ca)

September 22, 2021

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

## **RE: Intervention Regarding TIPB-002-2021**

I am writing to express the concerns of the Canadian Chamber of Commerce with the petitions to the Governor in Council requesting the review of the recent Telecom Decision CRTC 2021-181 ('Decision').

Consistent with the Chamber's position filed in February 2020 in support of a review of the CRTC's previous decision on this matter (CRTC 2019-288), we believe that in that decision the CRTC failed to balance the interests of all Canadians and the decision favoured a small number of internet resellers over the broader public interest.

Since then, the CRTC varied 2019-288 when it issued Decision 2021-181, and in doing so prioritized investment incentives to build out facilities-based networks by setting rates closer to the actual cost network builders incur in extending their networks to rural and underserved communities. Resellers, such as the petitioners, have enjoyed significant, risk-free growth under the previous rate regime. It was in the interests of all Canadians — and particularly those living in unserved and underserved areas — that the decision be reconsidered to ensure a balance is struck between accessibility, investment in networks, and competition.

As the voice of Canadian Business, the Canadian Chamber of Commerce represents over 200,000 businesses in every industry and every community in Canada. Chamber members have reaffirmed many times in recent years at Annual General Meetings the importance of addressing the digital services gap to access to high-speed networks.

In Decision 2021-181, the CRTC corrected the issues with the previous wholesale rate decision, which would have had a profound effect on the accessibility and quality of internet services provided to Canadians, forcing carriers that build network facilities to curtail new and necessary investments in new networks, particularly in rural and underserved areas of Canada. Unfortunately, the latest petition filed increases regulatory uncertainty and undermines federal, provincial, and regulatory broadband expansion programs like the Universal Broadband Fund and the CRTC's Broadband Fund, which expect to leverage billions in private investments to expand services to hundreds of Canadian communities and businesses.

Artificial Intelligence, automation and data analytics are changing how we live and work. As these innovations expand, all sectors of our economy, from mining and energy to agriculture, retail, transportation, financial services and high tech, are affected. Canada must ensure our world-leading companies and entrepreneurs can seize the opportunities of the digital age. This will only be achieved by improving high-speed network access in unserved and underserved communities.



The Governor in Council should deny the request filed by the resellers. The current pandemic has demonstrated how vital network builders will continue to be during this time of economic recovery, as virtual activities and work will continue to be part of the daily lives of Canadians. More uncertainty will only limit expansion of the critical digital networks to Canadian communities and businesses.

Sincerely,

Hon. Perrin Beatty, P.C., O.C.  
President and Chief Executive Officer  
Canadian Chamber of Commerce