

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 (“CNOC”).

2332683 Ontario Inc. o/a Coextro

- We are a member of CNOC, the voice of competitive Internet and telecommunications service providers that own/operate telecommunications networks in regions across Canada.
- Coextro, a service provider based in Mississauga, Ontario, provides both Facilities Based and Service Based Internet, TV and Home phone services throughout Ontario.

How Telecom Decision CRTC 2021-181 harms 2332683 Ontario Inc. o/a Coextro

Coextro was working hard and bringing new facilities-based services and service-based services to homes throughout Ontario, with plans to expand across the country. For years, while awaiting the ruling Coextro was forced to operate based on the new rates, as every reasonable person, including our customers, expected the original decision to remain largely un-changed. This was even more re-enforced after both the Federal Court of Appeals, and the Supreme Court through their actions left the original decision in place un-changed. Even the appeal by the Incumbents to cabinet was declined. The reversal by the CRTC was shocking and could not have been foreseen by any reasonable person.

We have recently entered the final phase of bringing high speed services to the Chippewas of Georgina Island, with plans to bring services to more underserved areas of Ontario that the Incumbents have ignored. These plans have now been cancelled due to the reversal of the 2019-288 rate decision. Plans for additional local hiring have been cancelled. New investments in network expansion have also been cancelled. Price increases to both existing and new customers have been implemented and continue to be implemented, ranging between 10%-30%.

Conclusion

Trust in the CRTC has been completely eroded. A FINAL decision released in 2019, not an Interim one, was completely reversed, with no real explanation. How are businesses such as ours to operate when we can't trust that a FINAL decision is really that, Final. We understand that appeals and changes can happen, but a full reversal that even included increases in rates... that is just something no reasonable person could plan for or expect.

We ask that you implement in full the original decision, 2019-288, a decision researched and worked on for years before release. There is no other reasonable alternative option that would be fair to Canadians.

Yours very truly,

Colin Legendre

Colin Legendre
President and CTO

Coextro - Unlimited. Fast. Reliable.

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
(by email andre.arbour@canada.ca)
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