

December 19, 2018

VIA Intervention Comment Form

Mr. Claude Doucet  
Secretary General  
Canadian Radio-television and  
Telecommunications Commission  
Ottawa, Ontario  
K1A 0N2

Dear Mr. Doucet,

**Subject: Telecom Notice of Consultation CRTC 2018-422: Call for comments –  
Proceeding to establish a mandatory code for Internet services**

1. The Canadian Communication Systems Alliance (“CCSA”) speaks for independent communications distributors – smaller broadcasting distribution companies, telephone companies and ISPs – across Canada. CCSA represents more than 110 companies operating from sea to sea to sea, including across the North.
2. CCSA wishes to be registered as a party to this proceeding and reserves the right to make further substantive comments on the proposed Internet Code in response to the submissions of other parties.
3. CCSA notes the Commission’s statement at paragraph 3(c) of TNC CRTC 2018-422 (the “Notice”) that:

Since 87% of Canadians with Internet services purchase their retail Internet subscriptions from a ‘traditional telephone’ or ‘cable’ company, limiting the initial application of the Internet Code to large facilities-based Internet service providers (ISPs) would strike an appropriate balance between addressing consumer concerns and not placing a heavy regulatory burden on smaller carriers or resellers.”

4. CCSA appreciates the Commission’s attention to the administrative burden that mandatory compliance with such a Code and mandatory participation in the CCTS would impose on the many small ISPs that CCSA represents.
5. CCSA agrees with and supports the Commission’s preliminary position, at paragraph 3(d) of the Notice, that the Code, if ultimately established, “should apply to all retail fixed Internet services provided to individuals and small businesses by large facilities based ISPs”.

6. That position is entirely appropriate given that, as the Commission notes at paragraphs 11 and 14, respectively, of the Notice, “the vast majority of complaints to the CCTS relate to large facilities-based ISPs” and “of the complaints the CCTS received about Internet services in 2016-17, 73% related to five large facilities-based ISPs: Bell Canada, RCCI, TCI, Videotron and Xplornet Communications Inc.”
  
7. CCSA thanks the Commission for the opportunity to provide these comments.

Sincerely,



Christopher J. Edwards  
Vice-President, Regulatory Affairs

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