

May 7, 2020

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 2019-420: Call for comments – Access to in-building wire in multi-dwelling units

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 has reviewed the comments of Novus Entertainment Inc. (“Novus”) in response to TNC 2019-420, as filed with the Commission on April 2, 2020.¹
3. Based on Novus’ distinction between “inside wire” and “in-building wire”, CCSA agrees with and endorses the basic principles set out in Novus’ comments, as follow:
 - a. in-building wiring should only have to be made available to a new entrant to a building where there is no other means for the new entrant to gain access to the inside wire of a customer requesting the new entrant’s services;²
 - b. where it is impossible for a new service provider to access a customer's inside

¹ Novus Entertainment Inc., “Telecom Notice of Consultation CRTC 2019-420: Call for comments - Access to in-building wire in multi-dwelling units”, April 2, 2020.

² *Ibid.* at para. 17(vi).

wire other than through connection to the in-building fibre of a current service provider, the new service provider and current service provider should settle between them the method by which the new service provider will be given access to the in-building fibre network, either through a patch panel or a cross connect;³ and

- c. The connecting service provider would pay a connecting fee equal to the amount for installing in-building wiring in that building.⁴

- 4. CCSA also agrees with and endorses Novus' general proposition that:

Service providers have by and large installed their own in building facilities of various kinds and have managed to develop standards for connecting to the Inside wiring in MDUs with a variety of technologies at this time. So long as the Commission allows the status quo to continue, it would appear that the industry and equipment manufacturers have established workable connection standards for connecting inside wiring.⁵

- 5. CCSA thanks the Commission for the opportunity to provide these comments.

Sincerely,



Christopher J. Edwards
Vice-President, Regulatory Affairs

³ *Ibid.* at para. 18.

⁴ *Ibid.* at para. 18.

⁵ *Ibid.* at para. 17(v).