

May 29, 2020

VIA GC Key

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

Dear Mr. Doucet,

Subject: Commission letter, May 15, 2020, “RE: Telecom Notice of Consultation CRTC 2019-57, Review of mobile wireless services – requests for information regarding the impact of Covid-19 on parties’ positions”

Reference: CRTC File #1011-NOC2019-0057

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 hereby advises the Commission that the COVID-19 pandemic has not changed any of the positions previously put forth by CCSA in the subject proceeding.
3. As CCSA submitted in its November 22, 2019 “Further Comments” in this proceeding:
 - In today’s environment, consumers have a strong expectation that their service providers’ retail offerings will permit them to use their mobile devices to access video, voice and data.
 - To the extent that independent TSPs are unable to offer such mobile service elements, their ability to compete for customers is severely impaired. That impairment – and the resulting lack of alternative “full service” providers – is a detriment to Canadians

in the communities that CCSA members serve who are currently deprived of the benefits of robust competition in wireless services.

- That constraint on competition and its negative impact on Canadians is contrary to the objectives of both the Federal Government and the Commission to encourage competitive entry, to promote greater price competition and, as a result, to create a more dynamic market for the benefit of consumers.
 - To remove that competitive constraint, CCSA submits the Commission should implement a framework which 1) encourages competitive entry by Full MVNOs by establishing that they are able to purchase RAN access from the MNOs at just and reasonable tariffed wholesale rates and terms; and 2) authorizes those Full MVNOs to re-sell to other providers. Such a competitive framework would:
 - provide CCSA’s larger members the opportunity to offer their communities increased choice in mobile services as Full MVNOs ; and
 - provide other CCSA members who lack the resources to turn up a Full MVNO operation to offer their communities a new “lighter” MVNO option, based on the purchase of wholesale services from new Full MVNOs.
4. The COVID-19 pandemic has underlined the very serious impact that lack of broadband connectivity – both fixed and mobile – is having on Canadian citizens and businesses who live and work outside the major urban centres.
 5. The pandemic has made it clear that Canada needs to accelerate its initiatives to bring high-speed, high quality connectivity to Canadians in all parts of the country.
 6. CCSA submits that the opening of the market to MVNO competition, in a timely way, is an important and appropriate response to that need.
 7. With respect to the effects of the pandemic, CCSA’s chief concern is that the incumbent

carriers will use that situation to delay competitive MVNO entry to the greatest extent possible and thereby entrench their existing competitive advantages for as long as possible.

8. CCSA submits that the pandemic has clearly underlined the need to move forward, expeditiously, to introduce effective competition into the mobile wireless services sector.
9. CCSA urges the Commission to move the TNC CRTC 2019-57 proceeding to conclusion quickly and to resist attempts by the incumbents to delay introduction of competitive services and the benefits they will offer to Canadians, wherever they live and work.
10. CCSA thanks the Commission for the opportunity to provide these comments.

Sincerely,



Christopher J. Edwards
Vice-President, Regulatory Affairs