



Jonathan L. Holmes
Executive Director
regulatory@itpa.ca

19 December 2019

By GCKey

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

Dear Mr. Doucet:

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

1. Pursuant to the procedures established by the Commission in the Notice of Consultation noted above (“TNC 2018-422”) the ITPA hereby submits this intervention on the behalf of its member companies. The list of ITPA members can be found in the Appendix to this letter. As these companies’ trade association, the ITPA hereby requests to be made a party to this proceeding.
2. The ITPA notes and supports the Commission’ preliminary view that any Internet Code should be applied to only the large facilities-based ISPs noted identified in footnote 4 of TNC 2018-442. Given that this group of service providers have over 85% market share between them, there is no demonstrated need to apply to the code to smaller individual service providers.
3. At this stage of the proceeding the ITPA takes no position on the other issues canvassed by the Commission in TNC 2018-422. However, the ITPA reserves the right

to provide further comments in the other stages of this process depending on the positions taken by other parties in their interventions.

Yours truly,

Jonathan
Holmes

Jonathan L. Holmes

Appendix

Independent Telecommunications Providers Association (ITPA)

9315-1884 Québec inc.
Brooke Telecom Co-operative Limited
Bruce Telecom
City West Cable & Telephone Corp.
Cochrane Telecom Services
CoopTel
Execulink Telecom Inc.
Gosfield North Communications Co-operative Limited
Hay Communications Co-operative Limited
Huron Telecommunications Co-operative Limited
The Lansdowne Rural Telephone Company Limited
Mornington Communications Co-operative Limited
Nexicom Inc.
North Frontenac Telephone Corporation Limited
North Renfrew Telephone Company Limited
Quadro Communications Co-operative Inc.
Roxborough Telephone Company Limited
Sogetel inc.
Tuckersmith Communications Co-operative Limited
Wightman Telecom Limited
WTC Communications

*** End of Document ***