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January 28, 2019

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

Dear Mr. Doucet:

**Re: *Proceeding to establish a mandatory code for Internet services, Telecom Notice of Consultation CRTC 2018-422 (“TNC 2018-422”) Reply Comments of TELUS Communications Inc. (“TELUS”)***

1. Please find attached for filing TELUS’ reply comments in this proceeding in accordance with the procedures outlined in the TNC 2018-422, and section 26 of the *Canadian Radio-television and Telecommunications Rules of Practice and Procedure*.
2. TELUS is filing part of this submission in confidence pursuant to section 39 of the *Telecommunications Act* and Rule 32 of *Canadian Radio-television and Telecommunications Commission Rules of Practice and Procedure*. Specifically, TELUS provides information in respect of the length of time and amount of money it anticipates spending to deploy a pre-sale quoting system. This information relates to TELUS’ internal system and is confidential pursuant to paragraphs 39(1)(b) and (c) of the *Telecommunications Act*.
3. TELUS routinely treats the costs associated with implementation of specific internal projects as confidential information. Disclosure of this information would provide competitors with data on TELUS’ internal cost structures. Competitors could use this knowledge to benchmark their costs against TELUS and gain a competitive advantage by undercutting TELUS’ costs. This could enable competitors to gain an unfair advantage in the marketplace, and cause material financial loss to TELUS. Treatment of this information as confidential is also consistent with the Commission’s guideline

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that it will generally treat as confidential “[c]ompany-specific cost study inputs (e.g. operating expense unit costs/factors, labour unit costs, capital unit costs/factors, capital and expense increase factors, demand).”<sup>1</sup>

4. TELUS asks that this information not be disclosed on the public record of this proceeding for the reasons set out above. An abridged copy of TELUS’ intervention is being provided for the public record.

Yours truly,

*{Original signed by Stephen Schmidt}*

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Attachments

- cc. Distribution list, Commission letter of 20 December 2018  
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<sup>1</sup> Broadcasting and Telecom Information Bulletin CRTC 2010-961, *Procedures for filing confidential information and requesting its disclosure in Commission proceedings*, 23 December 2010, Appendix.