



September 7, 2020

Claude Doucet
Secretary General
Canadian Radio-television and
Telecommunications Commission
Gatineau, Quebec
K1A 0N2

Dear Mr. Doucet,

Re: Telecom Notice of Consultation 2020-269 Call for comments – Imposition of administrative monetary penalties on Iristel Inc. and TELUS Communications Inc. in relation to the routing and termination of phone calls to the 867 area code in Northern Canada

1. This intervention is filed in relation to Telecom Notice of Consultation 2020-269. I do not support the imposition of monetary penalties against Iristel.
2. The Commission should not penalize Canadian companies like Iristel for investing in the North and competing against the telecom giants. Without Iristel and Ice Wireless, the North would be entirely at the mercy of a monopoly. Competition has been good for the North. We need more, not less.
3. If a penalty is imposed on Iristel, it is their customers in the North who will suffer due to reduced investment or increased prices to cover the penalty.
4. If the Commission does impose monetary penalties, which I do not support, the penalties proposed in the Commission's preliminary view against Telus and Iristel are completely disproportionate. Iristel is a private company with a few hundred employees. Telus is a telecom giant that earns tens of billions of dollars annually. Imposing a penalty that is of equal amounts is patently unfair and greatly favors the telecom giants. Iristel did not disrupt telephone service in the North but Telus did. Whatever harm "inefficient routing" may have done, if any, it did not affect Northerners. Iristel does not deserve to pay the same penalty as Telus.

Thank you for your consideration in this matter.

Kind regards,

A handwritten signature in black ink, appearing to read "Greg Abrams", written in a cursive style.

Greg Abrams
President