



November 20, 2020

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

Dear Mr. Doucet:

**Comments of the Government of the Northwest Territories
on Northwestel Tarrif Notice 1099 (8740-N1-202006775)**

Tariff Notice 1099 provides for the offering of unlimited internet packages in those communities where cable and fibre to the premises (FTTP) facilities are in place. While such packages are widely available in southern Canada, to date, they have not been offered in the North. The Government of the Northwest Territories (GNWT) considers this tariff notice to mark an important milestone in the ongoing efforts of service providers, regulators, and others to provide Northerners with service options that satisfy the Canadian Radio-Television and Telecommunications Commission's (CRTC) universal service objective.

While offering improved service options, the tariff application raises several concerns including, but not limited to, the appropriate level and affordability of prices and the absence of unlimited service packages for speeds below 50 Mbps in communities not currently served by cable or FTTP facilities.

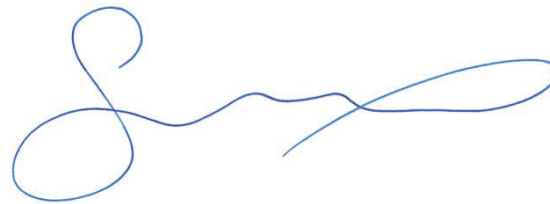
Additionally, SSI Micro in a letter to the CRTC dated October 27, 2020, has raised issues concerning the competitive impact of the tariffs, including its legitimate concern that a review of wholesale arrangements for facilities to provide internet service should be made.

It is perhaps for these reasons that the CRTC did not grant early interim approval to this filing as is customary for Group B tariff filings. Furthermore, on November 2, 2020, the Commission issued TNC 2020-367, initiating a full-scale review of telecommunications services in the North, including a review of internet service affordability and of the pricing and availability of wholesale services.

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A logical approach for the Commission would be to include a consideration of tariff notice 1099 in the TNC 2020-367 proceeding. The GNWT would support such an approach. The GNWT does not, however, believe that such a review should be allowed to delay the introduction of unlimited internet packages in the North, most particularly at a time when the COVID-19 crisis has increased the already substantial need for such service. For these reasons, we would propose that interim approval immediately be granted to tariff notice 1099 and that the issues noted above, and any other related matters, then be addressed in the context of the TNC 2020-367 proceeding, including a significant discussion with respect to affordability of internet packages in the North.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Caroline Wawzonek', with a large loop at the start and a long horizontal stroke at the end.

Caroline Wawzonek
Minister of Finance

- c. Mr. Curtis Shaw, President, Northwestel
- Mr. Jeff Philipp, Founder and CEO, SSI