

February 8, 2021

**Via GC Key**

Mr. Claude Doucet  
Secretary General  
Canadian Radio-television and  
Telecommunications Commission  
1 Promenade du Portage  
Gatineau, || Quebec  
J8X 4B1

**Re: 8638-M75-202008953, Application by Mitel Cloud Services, Inc. (“Mitel”) Requesting that the Commission instruct the Canadian Secure Token Governance Authority (“CSTGA”) to allow all LECs to participate in STIR/SHAKEN Application Requesting that the Commission instruct the CSTGA Authority to allow all LECs to participate in STIR/SHAKEN**

**Supporting intervention of Competitive Network Operators of Canada (“CNOC “)**

Dear Mr. Doucet:

1. CNOC, wishing to be considered an intervener in this proceeding, submits this intervention.
2. Mitel’s application concerns the ineligibility of non-carriers (*i.e.*, telecommunications service providers without direct access to Canadian telephone numbers) to join the CSTGA and obtain Level A certificates (*i.e.*, full attestation for calls) from the Certificate Authority, Neustar.
3. Mitel argues this is now out of sync with United States regime, and that forcing non-carriers to obtain delegate certificates is costly and problematic because delegate certificates may not be accepted by the carrier providing call termination, the entity that supplies the TSP with numbers may choose not to provide the TSP with delegate certificates, and the TSPs may not have access to their preferred routing due to lack of accommodation for delegate certificates, thereby raising the TSP’s costs and reducing their service level and quality. Mitel argues this will affect Type III CLECs, Type IV CLECs, MVNOs, registered local VOIP service providers and other local voice resellers. Mitel asks the CRTC to allow all TSPs to join the CST-GA and obtain certificates directly from Neustar.
4. CNOC recognizes Mitel’s concerns with possible anti-competitive effects resulting from institutional design. If only carriers can obtain full attestation for call, then only their customers will have the full benefits of STIR/SHAKEN. This outcome is out of step with telecommunications

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regulation that responds to the social needs of users, and telecommunications policy that is required to encourage all forms of competition.

5. CNOC supports measures that enhance trust in the communications system, and CNOC supports measures that result in fair competition. CNOC therefore supports Mitel's application.

Yours truly,



Geoff White  
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