

FILED VIA GCKEY

Page | 1

February 10, 2021

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

Dear Mr. Doucet,

TOPIC: Application by Competitive Network Operators of Canada for an expedited and temporary resale remedy for competitive access to Incumbent fibre-to-the-premises facilities

This letter is in support of the above noted application (“Application”) by Competitive Network Operators of Canada (“CNO”) for expedited and temporary resale remedy for competitive access to Incumbent fibre-to-the-premises facilities.

The commission has the power, right and obligation to end the worsening situation of undue preference that is identified by CNO. We support their statement that doing so requires little more than applying a tried and tested approach that the Commission has consistently pulled from its regulatory toolbox to facilitate temporary wholesale access: retail Internet service resale or retail IS resale (“RISR”).

There is with certainty an undue preference that has been created during this process. The delays and attacks to the CRTC process by the ILECs and/or Cable Carriers (individually, each an “Incumbent”; collectively, “Incumbents”) are endless. We note the use of the phraseology of an ‘attack’ based on the extreme aggression not just on companies like Frontier Networks (Frontier) but also on the CRTC through their seemingly endless court actions launched by them against your fair rulings.





frontiernetworks

Bringing an end to this undue preference as quickly as possible is critical to protect competition in Canada and the fair market which has worked well for years and poorly as of late.

Page | 2

Frontier respects the work and role of the CRTC and encourages you to use the vast power that is afforded to you to address the endless sense of entitlement of the incumbents. We observe that the CRTC's decisions in respect of access to fiber are currently subject to cabinet appeal.

There is no better time than now, in the middle of a pandemic, where business and consumers alike are suffering under various lockdowns and business interruptions, for the CRTC to rule in favour of greater competition, and thereby cause lower prices for Canadians when they need it most.

It is important to note that delay and further study always works to the benefit of the incumbents. We urge the Commission to approve quickly the remedies called for by CNOC, and we further urge the Commission to rule as fast as possible on more permanent solutions that introduce greater price competition into domestic telecommunications.

Respectfully submitted,

Luigi Calabrese

Copy: CNOc Regulatory (via email)
Tacit Law Regulatory (via email)
Chris Seidl, CRTC (via email)
Chris Noonan, CRTC (via email)
Lisanne Legros, CRTC (via email)
Michel Murray, CRTC (via email)
Bell Canada Regulatory (via email)
Saskatchewan Telecommunications Regulatory (via email)
TELUS Communications Inc. (via email)
Bragg Communications Incorporated, operating as Eastlink Regulatory (via email)
Cogeco Communications Inc. (via email)
Quebecor Media Inc. Regulatory, on behalf of its affiliate Videotron G.P. (via email)
Rogers Communications Canada Inc. Regulatory (via email)
Shaw Cablesystems G.P. Regulatory (via email)
Frontier Networks Inc. – regulatory@frontiernetworks.ca
Frontier Networks Corp. (via email)

