

**Filed via email to: [telecomsubmission-soumissiontelecom@ised-isde.gc.ca](mailto:telecomsubmission-soumissiontelecom@ised-isde.gc.ca)**

Innovation, Science and Economic Development Canada  
C.D. Howe Building  
235 Queen Street  
Ottawa, Ontario K1A 0H5

July 19, 2022

**RE: Innovation, Science and Economic Development Canada (“ISED”) - Order Issuing a Direction to the CRTC on a Renewed Approach to Telecommunications Policy**

Dear Minister Champagne,

Electricity Canada<sup>1</sup> is pleased to submit the enclosed comments on the consultation regarding an “order issuing direction to the CRTC on a renewed approach to telecommunications policy”.

1. Since 2018, different departments and institutions within the Government of Canada have been actively studying ways to improve rural broadband and small cell deployments. We view this new order as part of that work. This activity started with the Broadcasting and Telecommunication Legislative Review panel and its subsequent report, then continued with the CRTC’s consultation on the wireless market 2019-57 and the CRTC rural broadband consultation 2019-406, which resulted in a sub-consultation 2020-366 that focused on access to support structures.
2. The goals of these collective consultations have been to receive feedback on how to ensure that rural broadband is available and that small cells can be deployed nationwide. It is Electricity Canada’s position, and that of its member companies, that electrical utilities support telecommunications companies and provincial/territorial governments to enable rural broadband expansion. It is also our position that there has been no market failure within the scope of provincial/territorial authority that is not currently being adequately addressed. Although many people in remote locations do not yet have broadband, we believe provincial/territorial and federal funding programs could address those challenges. Specifically, we direct ISED’s attention to the

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<sup>1</sup> Electricity Canada is the new name of the Canadian Electricity Association (CEA). Our business and interests remain identical to those described in our previous submissions to the Department of Innovation, Science and Economic Development Canada (ISED).



Ontario Building Broadband Faster Act<sup>2</sup>; the mass broadband deployments happening throughout the Maritimes<sup>3, 4</sup> and British Columbia; TELUS' recent announcement of its \$17 billion investment in western Canada<sup>5</sup>; and, Quebec's technology roll out<sup>6</sup> as evidence of that significant progress.

3. With respect to the policy recommendation of supporting the objective of universal access<sup>7</sup> to electrical distribution poles, we are not aware of any instances where an electrical utility has prevented the installation of wireline or small cell attachments unless for sound reasons such as safety or electrical system reliability issues being present. We maintain that safety and reliability of the system must remain paramount when considering wireline or small cell attachments.
4. While the CRTC mandate has been to facilitate and enable rural broadband and improved connectivity, it is our perspective that ISED shares some of that responsibility as well. ISED remains responsible for ensuring that spectrum is available for all those entities that need connectivity, be they rural or remote communities, or industry. The department's decision for the consultation on Access Licensing and Private Broadband could substantively improve connectivity and the much awaited consultation for the new wide band spectrum (also called WBS) at 3900-3980 MHz will do the same.
5. To meet the goals of improving access to telecommunications services, for both rural broadband and small cells, we have previously recommended the CRTC actively use its existing regulatory powers to mandate better cooperation and diminish existing anti-competitive practices between telecommunications companies. If the CRTC were to use its authority in this way, in concert with what is happening at the provincial/territorial levels, Electricity Canada members believe Canadians would be well served.

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<sup>2</sup> <https://www.ontario.ca/laws/statute/21b02>

<sup>3</sup> <https://globalnews.ca/news/7461372/rural-internet-upgrades-new-brunswick/>

<sup>4</sup> <https://novascotia.ca/news/release/?id=20210125007>

<sup>5</sup> <https://edmontonjournal.com/news/local-news/telus-to-invest-17-billion-across-alberta-generate-8500-jobs-over-four-years>

<sup>6</sup> <https://www.cbc.ca/news/canada/montreal/trudeau-quebec-high-speed-internet-1.5959741>

<sup>7</sup> [Order Issuing a Direction to the CRTC on a Renewed Approach to Telecommunications Policy \(canada.ca\)](https://www.cbc.ca/news/canada/montreal/trudeau-quebec-high-speed-internet-1.5959741)



Sincerely,

Arjun Devdas  
Manager, Asset Optimization, Hydro One  
Chair, Joint Use Practice & Policy Committee, Electricity Canada

Channa Perera  
Vice President, Regulatory and Indigenous Affairs, Electricity Canada