



12/01/2007

Len St-Aubin
Director General
Telecommunications Policy
Industry Canada
300 Slater Street, 16th floor
Ottawa, Ontario K1A 0C8

Dear Mr. St-Aubin,

Re: Canada Gazette, Part 1, Dec. 16, 2006

Order Varying Telecom Decision CRTC 2006-15

The Canadian Telecommunications Employees' Association (CTEA) represents approximately 10 per cent of the Telecom workforce. For 60 years as telecom has changed and evolved into a major driving force in the development of Canada's economy, the CTEA has proudly represented workers in telecommunications and telecommunications-related companies exclusively. Our 14,000 members and their families (and the communities in which they live) are dependent upon the fortunes of Canada's telecommunications industry. The future health and well being of this sector which is an underpinning and stabilizing force for growth in Canada's economic fabric is essential to this important group of Canadians. For this reason, we are providing our support to the proposed Order Varying Telecom Decision CRTC 2006-15 on local forbearance.

In our view, the proposal is important because it aims to reduce unnecessary regulation and to increase the reliance on market forces and encourage competition in telecommunications. This regulatory and policy shift is critical to the traditional telecommunications service providers (who are our employers) and to their ability to remain competitive. Moreover, given the role of telecommunications in Canada economy, we feel changes such as this are long overdue to invigorate this important sector and achieve the real benefits of competition for the Canadian consumer. We have long been concerned that our employers' ability to compete on a level playing field has been limited by regulatory restrictions placed on them, ironically in the name of competition.

**Canadian Telephone
Employees' Association**

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The CTEA strongly endorses regulatory reforms such as the one in the proposed Order – reforms that will result in our employers no longer being at a competitive disadvantage in the marketplace which is critical to the futures of our members and their families.

We agree with the Government's approach to encourage deregulation of the retail local telephone market in a "more timely and efficient manner" and its commitment to ensure that regulation only applies where it is still necessary and that regulation interferes with market forces to the minimum extent possible.

We also pleased that the Government has proposed the elimination of restrictions on "winbacks" and other promotions. For our employers to effectively compete and participate to a competitive dynamic in the marketplace, these restrictions must be eliminated. As the Government has noted, the state of competition in the telecommunications market is such that these restrictions are no longer appropriate.

Our members rely on our employers' ability to compete without unnecessary restrictions and burdensome regulation.

The Government's decision to vary the decision of Canadian Radio-television and Telecommunications Commission (CRTC) on local forbearance is very much in step with the perspectives and recommendations of the Telecommunications Policy Review Panel and we commend the Minister for taking action in this direction.

Sincerely,



Brenda Knight
CTEA President

c.c.: Hon. Maxime Bernier, Minister of Industry
Brian Masse, M.P., Windsor West