

January 4, 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 Ontario Chamber of Commerce (OCC) applauds the recent proposal to modernize the regulatory framework for Canada's telecommunications industry as it will foster growth and innovation across the country.

Increasingly, businesses have come to rely on telecommunications technologies for daily transactions and operations. The dynamic landscape of how companies conduct their business reflects the rising demand for sophisticated and reliable communication capabilities.

Emphasizing the presence of competitive infrastructure or a facilities-based approach rather than focusing on market share is commendable. It demonstrates a commitment to creating a regulatory framework which relies primarily on free market forces. The decision to allow for unrestricted competition in areas where at least three independent telecom providers exist will indeed generate greater competition within the telecommunications industry. More importantly, it will lead to competitive prices and greater choices for consumers and businesses.

In previous submissions to the Telecommunications Policy Review Panel, the OCC endorsed adopting an approach grounded in sound economic principles and with greater deregulation. The OCC outlined a number of recommendations, urging for "smart" regulation and the elimination of administrative "red tape".

The OCC recommended that regulation be imposed only when needed, and is pleased that this change is included in the proposal. This approach is comparable to other regulatory regimes which work from the premise that regulations are only administered if the dominant competitor is acting in an uncompetitive manner.

The OCC is pleased that the proposal is reflective of previous recommendations made to create a telecommunications regulatory regime which will achieve overall increased efficiency in the sector. By introducing a telecommunications regulatory system more reliant on market outcomes and less on extensive regulations, Canadian telecom providers will become more competitive.

The OCC welcomes this move towards a more modernized and competitive telecommunications regulatory regime. This decision signals the recognition that a strong telecommunications sector is critical to building a stronger national economy. If you any questions or comments you may direct your staff to contact Stuart Johnston, Vice President Policy and Government Relations, at (416) 482-5222, extension 232.

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'Len Crispino', with a stylized flourish at the end.

Len Crispino
President and CEO

cc: The Honourable Maxime Bernier, Minister of Industry M.P., P.C.
OCC Members