

To the Director General, Telecommunications and Internet Policy Branch, Innovation, Science and Economic Development Canada:

As outlined on <https://www.ic.gc.ca/eic/site/smt-gst.nsf/eng/sf11484.html> , please accept the following as my comments on the proposed "Order Issuing a Direction to the CRTC on Implementing the Canadian Telecommunications Policy Objectives to Promote Competition, Affordability, Consumer Interests and Innovation".

My name is Denver Gingerich, and I am the founder and operator of Soprani.ca Telecom, a registered business in BC that provides phone and texting services through its main service offering, JMP (see <https://jmp.chat/> ). As a small business, it is important that we are able to access the same markets as the incumbent large telecom companies, which can often be difficult due to the resources these companies have to stifle competition.

When I spoke with a Rogers representative at the recent BC Tech Summit to see if Rogers would allow JMP to purchase cellular data from Rogers to re-sell to JMP customers (bundled with other JMP services), the representative responded with, "Wouldn't that compete with us?" It appeared the implication was that Rogers would never voluntarily enter into an agreement with a company, especially a small business like Soprani.ca Telecom, that might in some way compete with them.

As a result of this experience and what I suspect are many similar experiences others have had (based on the general lack of MVNO offerings available in Canada), I was very happy to see this proposed Order to the CRTC, especially the following sections:

That the Commission "should consider how the measures used can promote competition, affordability, consumer interests and innovation, namely the extent to which they ... reduce barriers to entry and barriers to competition for new and smaller telecommunications service providers [and] enable innovation in telecommunications services, including new technologies and differentiated service offerings"

Through <https://jmp.chat/> , Soprani.ca Telecom is innovating in the telephony space, offering calling and texting for less than \$5 per month, with no ads or credit checks. Many customers use our service exclusively on wifi, in which case they don't need to pay a cellular carrier at all. However, most customers find they still use a cellular provider when away from wifi, and we are currently unable to bundle our service with a cellular data plan due to Canadian carriers' refusal to sell bulk data to small businesses like us. Consequently, these customers must spend extra money to maintain a plan with a cell carrier, which makes it much more difficult for JMP to compete than it would be if JMP could bundle its service with cellular data purchased from the existing carriers.

So we at Soprani.ca Telecom are fully in support of this Order, and we are happy to see progress being made in this area.

Please don't hesitate to contact me if you have any questions about my comments, or if you would like to know more about JMP or Soprani.ca Telecom. I am available at this email address or by phone at +1 416 993 8000 .

Thank-you very much for your time.

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