



April 5, 2019

Ms. Pamela Miller
Director General
Telecommunications and Internet Policy Branch
Innovation, Science and Economic Development Canada
235 Queen Street, 10th Floor
Ottawa, ON K1A 0H5

Attention: Pamela Miller, Director General

Via Email: ic.telecomsubmission-soumissiontelecom.ic@canada.ca

Subject: Canada Gazette, Part I, March 9, 2019: In the Matter of Order Issuing a Direction to the CRTC on Implementing the Canadian Telecommunications Policy Objectives to Promote Competition, Affordability, Consumer Interests and Innovation

Dear Ms. Miller:

Thank you for the opportunity to comment on the Governor in Council's proposed Order Issuing a Direction to the CRTC on Implementing the Canadian Telecommunications Policy Objectives to Promote Competition, Affordability, Consumer Interests and Innovation (Policy Direction), published in the Canada Gazette, Part I on March 9, 2019.

The Canadian Chamber of Commerce is Canada's largest and most influential business association representing 200,000 businesses of all sizes in all sectors of the economy and in all regions. The Chamber's mission is to foster a strong, competitive and profitable economic environment that benefits not only business but all Canadians.

Canada already enjoys world class wireless networks, with LTE available to 99% of the population. However, technology evolves quickly and we cannot stop investing in new digital infrastructure. At a time when more and more of our personal and professional lives are lived online, when the rise of artificial intelligence, increased automation and access to big data have the potential to transform entire sectors of the economy, Canadian business needs reliable digital infrastructure. High-speed networks allow better communication and new tools and open up avenues for the sharing and transfer of data and ideas.



For instance, 5G technology has the potential to be up to 20 times faster than 4G. Augmented reality, virtual reality, robotics, cloud gaming, immersive education, healthcare, transportation, energy, and agriculture will all see massive shifts in efficiency and productivity with these new networks. Realizing these advantages will require massive infrastructure investments, estimated \$26B and generating 250,000 permanent full-time jobs and \$40B incremental GDP by 2026.

While the Canadian Chamber supports the Policy Direction's purpose of promoting "competition, affordability, consumer interests and innovation", we are concerned about the impact of the Directive on continued investment in communications infrastructure. We urge the government to consider amending the proposed direction to recognize the importance of this investment to achieve the proposed policy objectives.

Business now runs on digital networks. To ensure the continued investments in wireless infrastructure needed to achieve the Government of Canada's goals, including connecting all Canadians, supporting innovation, growing the Canadian economy and creating well-paying jobs, the Canadian Chamber of Commerce urges an amendment to the Policy Direction by adding a new paragraph 1.a.viii to the Policy Direction that reads: "encourage capital investment in telecommunications infrastructure."

Thank you again for the opportunity to comment.

Sincerely,

Hon. Perrin Beatty, P.C., O.C.
President and Chief Executive Officer
Canadian Chamber of Commerce