



April 8, 2019

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

On behalf of Cogeco Inc., and its subsidiaries, please find below our comment on the proposed policy direction to the CRTC, published in the Canada Gazette, Part 1, on March 9, 2019.

Cogeco Inc., through Cogeco Connexion, is the second-largest cable operator in Ontario and Québec. It provides residential and business customers with video, telephone and internet services via advanced fibre optic and two-way broadband distribution networks at speeds higher than 120 Mb/s to 98% of its subscribers in more than 400 communities across Ontario and Québec.

In the past five years alone, Cogeco has invested more than \$1 billion in infrastructure, expanding and upgrading its powerful hybrid network which runs from Windsor, Ontario to Gaspé, Québec, and introducing new products such as the Docsis 3.1 communication protocol that allows Internet speeds of up to 1000 Mb/s (1 Gb/s).

Cogeco Inc. takes pride in its focus on serving residents and businesses in regional and rural communities. We are making the most of the latest technological advancements to enable more Canadians to be connected to the world. We are actively engaged with federal agencies, both on our current telecommunications offerings and on the importance of creating a regulatory environment that enables new entrants and regional players like Cogeco to offer wireless services and provide more choice for consumers.

We therefore wish to reiterate our strong support for the objectives outlined in the proposed policy direction. In particular, we agree with the need to:

- foster affordability and lower prices, particularly where there is potential for telecommunications service providers to exercise market power;
- ensure that affordable access to high quality telecommunications services is available;
- continue protecting the rights of consumers in their relationships with telecommunications service providers;
- reduce barriers to entry and barriers to competition for new and smaller service providers, especially in the wireless sector; and,
- enable innovation in telecommunications services, including new technologies and differentiated service offerings.

Cogeco Inc.'s position is that the wireless telecommunications sector would see meaningful and sustainable improvements to competition if smaller, regional service providers could offer new, modern wireless offerings to their customers. With the right regulatory frameworks in place, the proposed policy direction's objectives of promoting

competition, affordability, consumer interests and innovation can be accomplished without compromising investment in infrastructure and network facilities.

Cogeco Inc. supports the proposed policy direction as outlined in the Canada Gazette. It is our view that the proposed policy direction has the potential to improve the competitive landscape of Canada's telecommunications market, particularly in the wireless services market, if federal agencies ensure that policy and regulatory frameworks rightly balance the openness to all forms of competition without compromising ongoing investment in wireline and wireless network infrastructure.

Should you have the need to contact Cogeco, feel free to contact me at 514-764-4746 or marie-helene.labrie@cogeco.com.



Marie-Hélène Labrie
Senior Vice President, Public Affairs and Communications
Cogeco Inc.

c.c: The Honourable Navdeep Bains, P.C., M.P., Minister of Innovation, Science, and Economic Development