



E.C.I.NETWORKS

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Director General  
Telecommunications and Internet Policy Branch  
Innovation, Science and Economic Development Canada  
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Ottawa, Ontario K1A 0H5  
Filed electronically: [ic.telecomsubmission-soumissiontelecom.ic@canada.ca](mailto:ic.telecomsubmission-soumissiontelecom.ic@canada.ca)

**Re: March 9, 2019 notice Canada Gazette, Part 1, Volume 153, Number 10: Order Issuing a Direction to the CRTC on Implementing the Canadian telecommunications policy Objectives to Promote Competition, Affordability, Consumer Interests and Innovation**

**Dear Minister Bains,**

I am writing to you from E.C.I. Networks to let you know of our concerns with respect to the Government of Canada's proposed new policy direction for the Canadian Radio-television and Telecommunications Commission (the CRTC).

Established in 1998, E.C.I Networks is a trusted expert and supplier of end-to-end optical communication solutions. We are very proud to be an innovative Canadian company that provides outstanding service and support to our customers, both within Canada and internationally, for their optical telecommunications equipment and network needs. We supply reliable and standards-based products that improve our customer's position in the very competitive telecommunications, data and network marketplace. We offer services such as custom coding cloud-hosted solution to re-use and re-program transceivers, custom cable length and test automation.



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However, we are very concerned about the negative effects that we believe that the new policy direction is likely to have on investment in equipment and services such as those that our company provides. At a time when demand for all-fiber and other new broadband technologies continues to grow and evolution to 5G networks will require investment, this type of policy directive sends a negative message. We also expect that facilities-based competitors in Canada would reduce their planned investments in infrastructure, which would have further negative impacts on suppliers such as ourselves.

In closing, we reiterate that that maintaining or enhancing current investments in next-generation networks and services will be a strong factor in contributing to employment and growth in the supply chain and will provide benefits to Canadians overall. We therefore urge the Government of Canada to implement policies that support and promote such ongoing investment in advanced communications networks by Canada's facilities-based competitors. Thank you for providing the opportunity for us to provide our views on this important matter.

Sincerely,

E.C.I. Networks

Mark Radzichowsky  
Director of Finance

**c.c** The Hon. Navdeep Bains, PC, MP, Minister of Innovation, Science and Economic  
Development  
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