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April 5th, 2019

Director General
Telecommunications and Internet Policy Branch
Innovation, Science and Economic Development Canada
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Proposed Policy Change to Facilities-Based Competition

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

Oakville Enterprises Corporation (OEC) is a municipally owned energy and infrastructure company. We serve municipal, provincial and national telecommunications and energy companies with offices throughout Ontario and headquartered in Oakville. OEC specializes in supporting the country's telecommunication networks by providing utility engineering, asset damage prevention, utility locates, network installation and GIS mobile and aerial mapping.

As COO of OEC's infrastructure companies, I believe it is very important to provide comments and feedback regarding the Government of Canada's proposed new policy direction for the CRTC. We believe the policy changes will hinder, if not stifle the significant capital investment currently being made by multiple telecom service providers (both wireless and wireline) across Canada.

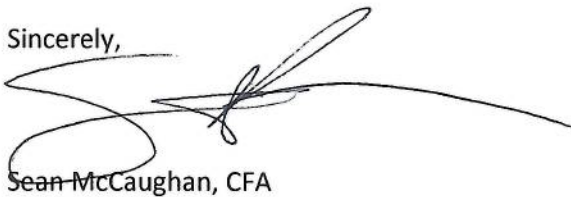
OEC currently employs in excess of eight hundred (800) men and women across the country that support the various telecom service providers in next generation network (wireless and wireline) expansions, as well as maintaining a high level of service continuity to their respective customers.

OEC is very proud to contribute to the economic health of the communities where our employees live and work. Our growth and sustainability are dependent on our customers' ability to invest in their networks. We foresee this policy change having the following negative outcomes:

- Demand for all-fiber and other new broadband technologies continues to grow and evolution to 5G networks will require significant investment
- The Government's proposed policy direction to the Canadian Radio-television and Telecommunications Commission (CRTC) could force Canada's network builders and innovators to open up their communications networks for resale by non-network service providers. This will have a negative impact on the customer experience
- Forcing companies that are building and upgrading their networks to share the benefits of those investments with their competitors will discourage future investment
- Compelling Canadian facilities-based competitors to scale back on planned investments in infrastructure would have negative secondary impacts on suppliers such as OEC
- Investments at risk are those specifically intended to extend and improve the reach and capabilities of advanced wireline and wireless networks
- Investment by Canada's facilities-based competitors will decrease, especially in underserved areas and will exacerbate the urban-rural digital divide
- Future jobs and economic opportunities for not only OEC, but residents and businesses in many smaller communities will be diminished
- Suppliers such as OEC that larger companies depend on for critical elements of their large-scale projects may no longer be able to provide services

OEC encourages the Government of Canada to foster competition between facilities-based service providers through continued investment in their respective network infrastructure. Investments in next-generation networks and services contribute to employment and growth and benefits Canadians overall. We respectfully urge the Government of Canada to move forward with policies that clearly support ongoing investment in advanced communications networks by Canada's facilities-based competitors.

Sincerely,



Sean McCaughan, CFA
Chief Operating Officer, Energy & Infrastructure Services
Oakville Enterprises Corporation

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