



APRIL 4, 2019

Director General
Telecommunications and Internet Policy Branch
Innovation, Science and Economic Development Canada
235 Queen Street, 10th Floor
Ottawa, Ontario K1A 0H5
Filed electronically: ic.telecomsubmission-soumissionstelecom.ic@canada.ca

Dear Ms. Groeneweg,

**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**

I am writing to you on behalf of our company, Skyward Towers Inc., and its 21 employees, with respect to the government's proposed new policy direction for the CRTC. Our concern is that its competition and affordability objectives will be more than compromised by detrimental impact to long-term consumer interests and industry innovation and investment.

Skyward Towers is a design-build company that installs tower and roof-top sites for the telecommunications industry. We have been providing stable, well-paying jobs in the Kitchener-Waterloo-Cambridge area since 1996, and our staff has been involved with over 9,700 projects to date. In addition, we spend upwards of 30% of our revenues in sourcing Canadian materials and local outside services to complete these projects and upgrades.

Our longevity and success is at least somewhat remarkable given that we exist and operate at the "thinnest edge of the wedge", namely **discretionary capital spending** by industry carriers. Simply put, we owe our balance sheet to the boldness of both current and past carriers to believe and invest in Canadian telecommunications infrastructure.

We also continue to evolve as the industry has evolved. While we still "stack steel", our employees also provide critical technical services to make 3, 4 and soon 5G networks run.

Which brings us to this new policy direction. It could force Canada's network builders to open up their communications networks for resale to non-network service providers. This does NOT reward much-needed investment and in fact discourages it for EVERYONE. We urge our Government to reconsider.

The demand for all-fiber and other new broadband technologies continues to grow and evolution to 5G networks will require significant investment. These new networks can help reduce the urban-rural digital divide and create future jobs and economic opportunities for residents and

businesses in many smaller communities. At a time of escalating rents and housing prices in Canada's three largest cities, this is a critical policy objective and consumer interest.

It can also be called nation-building. Only the largest carriers have the long-run view and capacity to extend and improve the reach and capabilities of advanced wireline and wireless networks to under-served areas. Yet, forcing them to share the benefits of their legacy urban investments with their competitors will discourage new investment.

This in turn will affect Skyward, its employees and supply chain. We need more competitors, not less, willing to spend more, not less, on new facilities and networks.

We are proud of our small role in network building and again 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.

Canadians deserve no less.

Respectfully,

A handwritten signature in blue ink, appearing to read "B. Turpin". The signature is stylized with a horizontal line under the "B" and "T".

Bernard P. Turpin
Chief Operating Officer
Skyward Towers Inc.

c.c. The Hon. Navdeep Bains, PC, MP, Minister of Innovation, Science and Economic
Development
ised.minister-ministre.isde@canada.ca