

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

Re: March 9, 2019 notice Canada Gazette, Part 1, Volume 135, Number 10: Order Issuing a Direction to the CRTC on Implementing the Canadian telecommunications policy Objectives to Promote Competition, Affordability, Consumer Interests and Innovation

TRJ TELECOM specializes in the deployment, modernization and maintenance of telecommunications systems. With expertise in telecommunications and civil engineering, our company has rapidly staked its ground as an emerging leader in the industry. Head Quarter in Montreal and regional offices in Toronto, Quebec City, Kingston and Ottawa, TRJ Telecom count on more than 650 talented experts to deliver full range of services like: Directional Drilling; Trenching; Installation of Overhead and Underground Lines; Network Start-Ups; Network Modernization and Maintenance; Civil Engineering; Fusion Splicing; Integration of Wind Energy Systems and Technical Outsourcing.

We at TRJ TELECOM believe that 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, putting at risk significant capital investments in digital infrastructure by major network service providers, at a time when our economy needs these investments the most.

The proposed policy will put at risk investments intended to extend and improve the reach and capabilities of advanced wireline and wireless networks across Canada.

Any policy change that leads to a decrease in expected capital investments by major network service providers impacts suppliers like us TRJ TELECOM, it will directly impact some 500 high skilled employees and indirectly a network of many sub-contractor jobs as well as our yearly 5-7 Million dollars planned investments in people and technology. It affects as well larger companies who depend on us as critical elements of their larger-scale projects. This type of policy change will impact future jobs and economic opportunities for residents and businesses in many smaller communities.

Our recommendation for the Government is to focus on how best to encourage rather than curtail investment and not to issue that policy direction and if so make sure that the CRTC fosters competition between facilities-based service providers/builders.

To conclude we would like to reiterate that ongoing investments in next-generation networks and services contributes to employment and growth in the supply chain and benefits Canadians overall, and we 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



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