



April 4, 2019

By email to: [ic.telecomsubmission-soumissiontelecom.ic@canada.ca](mailto:ic.telecomsubmission-soumissiontelecom.ic@canada.ca)

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

**Subject: 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**

I write to you on behalf of **Trylon TSF Inc. ("Trylon" or the "Company")** to express our concern regarding the referenced policy direction to the CRTC and the impact that direction may have on investment in infrastructure in Canada.

Trylon TSF plays a critical role in the deployment of advanced infrastructure in Canada. The Company is and has been a supplier of broadband infrastructure installation and maintenance activities to all of the major Canadian telecommunication carriers for the last 30 years. Trylon has offices in Langley, B.C., Calgary, Alberta, Elmira, Ontario (head office), Brampton, Ontario and Truro, Nova Scotia. The Company employs 225 people in Canada and directly or secondarily employs hundreds of sub-contractors. Our major customers are Bell, Rogers, Eastlink, Shaw and Telus.

As a significant Canadian employer we are concerned with the new policy direction the Government has provided to the CRTC. We believe that the policy direction may have the effect of reducing investment in wireless infrastructure in the medium to long term. There is significant investment required in Canada to deploy new 5G and other broadband technologies. The Government's policy direction could result in Canada's network builders, owners and operators being required to open up their communications networks for resale by non-network service providers. This will not promote investment it will discourage it. Discouraging investment is contrary to the Government's aims and it will have significant negative impact on companies like Trylon.

Trylon provides Engineering Services, Construction Services and Manufactures steel products for wireless and wireline infrastructure. A policy direction that discourages investment in broadband, 5G or other wireless or wireline technologies will hurt every aspect of our business. We believe that the investments most at risk are those that would be focused on advanced wireline and wireless networks and that it will disproportionately affect underserved areas where return on capital deployed is most challenging. This in turn will increase the discrepancy in service between urban and rural communities which is contrary to the Government's stated aims.



Thank you for your consideration of the above. Next generation networks and services contribute to employment and economic development that benefit all Canadians. We strongly urge the Government of Canada to implement policies aligned with continued investment in advanced communications networks across Canada.

Sincerely,

J. Paul Royal  
Chief Executive Officer  
Trylon TSF, Inc.

CC:

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