

March 24, 2019

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 I, 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

To Whom it may concern,

I am writing this letter as a representative of VistaCare Communications regarding the recent direction to the CRTC on Implementing the Canadian Telecommunications Policy Objective to Promote Competition, Affordability, Consumer Interests and Innovation.

VistaCare Communications is a communication contracting and engineering company employing over 300 employees who support the construction and design of outside and inside plant networks across Canada. VistaCare supports the expansion of FTTx and WTTx networks on behalf of incumbent and competitive local exchange carriers as well as a number of new community-based providers to support engineering and construction services.

VistaCare has been in operation for over 15 years and in that time has expanded its services across Canada. With every build VistaCare focuses on hiring local whenever possible and when necessary will set up temporary shops renting houses, staying in hotels, eating in local restaurants, buying supplies at local businesses etc. all resulting in a significant contribution to the local market we are in.

In recent years we have noticed a significant trend of all carriers to expand into more rural markets, driving high bandwidth services to smaller and smaller communities. This is a trend that should be allowed to continue to allow all Canadians to benefit from this expansion.

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After a careful review of the directive, it is VistaCare's opinion that the requirement that the CRTC encourage all forms of competition will reverse the longstanding policy of promoting facility-based competition. This has the potential to allow an environment where network owners will be forced by regulation to make their networks available to competitors. This will result in a decline in the financial capital required to continue expansion of rural broadband as resellers target denser urban populations at a time where Government and industry are about to make large rural broadband investments in partnership with various providers and communities. In addition, the industry requires significant investment to build the next generation 5G networks, WTTN and complete FTTH expansion.

All together this directive will impact high paying jobs in all regions directly involved in the design and construction industries as well as secondary industries that supply and support these builds. This would be in favour of resellers who will have immediate access to existing networks and customers. Resellers do not create jobs of the same magnitude and do not have a commitment to extending services to those who have not already been served.

I appeal strongly to you re-consider this directive and consider the impact to carriers' ability to continue growing their networks to reach Canadians in communities that do not currently benefit from leading edge broadband services. Please also consider the thousands of workers that will be affected with the implementation of this directive.

Sincerely yours,



Keith Bennett
Vice President of Operations
VistaCare Communications