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**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**

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## **Outline of iBwave Solutions Inc. Comments on Order Issuing a Directive to the CRTC on Implementing the Canadian Telecommunications Policy Objectives to Promote Competition, Affordability and Innovation**

**Note:** These comments are the subject of a consultation for a pending CRTC Order to implement a proposed directive from the Cabinet of the Executive branch of the Canadian government. The directive is not final. The consultation is for the purpose of soliciting public comment on the proposed directive for consideration by the Executive before the directive is finalized.

### **Introduction**

- iBwave Solutions Inc hereby respectfully submits the following comments in response to the consultation on the pending CRTC, *Order Issuing a Directive to the CRTC on Implementing the Canadian Telecommunications Policy Objectives to Promote Competition, Affordability and Innovation*, as published in *Canada Gazette, Part One, Volume 153, 10*.
- iBwave founded and headquartered in Montréal since 2004 has invented and sold its Software solutions to most of the telecom operators around the world. iBwave has developed the first software aimed at designing in building wireless coverage. All the telecom operators in Canada use ibwave software solutions.
- More recently , iBwave has developed and commercialized the first software solution for FTTH MDU deployment. Bell Canada has been the first operator in the world adopting our solution and by doing so accelerating the deployment of its FTTH deployment.
- Since Corning has decided to acquire iBwave in 2015, we have created in Montreal a research development center focused on bringing the latest software innovation to the telecom operators. We believe the combination of 5G with fiber network infrastructures will provide opportunities to

develop several new services that will benefit all the citizens. This is why we support the deployment of network infrastructure by investing in Augmented reality or Machine learning in our Montreal headquarter.

### **Recommendation**

- The challenge facing the CRTC is to design a regulatory regime that will give consumers low-priced next generation broadband services without imposing a heavy regulation on network providers that will inhibit investment in next generation network capabilities needed to deliver known services and yet-to-be discovered services for the future.
- As a Canadian headquartered software leader, we have in our country some strong telecom operators who are driving massive and innovative network deployments (wireless and wireline). These leaders, with whom we collaborate to develop new solutions are vital for our company because they permanently challenge us on their infrastructure roll out plans.
- It is crucial that any change in the current telecom regulation does not discourage or reduce the amount of infrastructure spent in Canada. We have seen in Europe particularly that the competition had facilitated the entry of new players that have deployed limited new infrastructure and mostly in dense areas where it was easier to compete and cut prices. This has been at the detriment of less populated areas.

The Canadian operators have heavily invested in fiber over the last years and to our knowledge they plan on accelerating these deployments that are crucial for enabling 5G services. Our economy will greatly benefit from these investments. These will allow Canadians and Canadian businesses to advantageously compete on the world stage in this era of digital economy.

As we enter into a worldwide race for the deployment of 5G infrastructure deployment, it is vital that the change of the Telecommunication policy in Canada encourages innovation and infrastructure build across our country for the current and the new players tempted by this market.

Best Regards,

A handwritten signature in dark red ink, appearing to read 'Claude Echahamian', with a stylized flourish at the end.

Claude Echahamian  
President and CEO