



Ms. Danielle May-Cuconato

Secretary General

Canadian Radio-television and Telecommunications Commission

Gatineau, Quebec

K1A 0N2

Dear Ms. May-Cuconato,

Subject: Telecom Notice of Consultation CRTC 2015-134, Review of basic telecommunications services – (CRTC File CRTC File 8663-C12-201503186)- Intervention of Internet Society Canada Chapter Monday, February 08, 2016

1. [The Canada chapter of the Internet Society \(ISCC\)](#) is a volunteer association of paying members who seek to advance the cause of the Internet in Canada. The Canada chapter was formed many years ago, fell into inactivity and was recently re-launched in 2013. It forms one of many chapters of the global [Internet Society](#) around the world. There are at least two such chapters in Canada, this one and ISOC Quebec chapter.
2. The Internet Society's [goals and mission are stated here](#), to which the Canadian chapter adheres. The Canada Chapter's paying membership numbers about 60 people, many with significant associations with the Internet, telecommunications or regulation, and its work is carried out by volunteers.
3. In regard to the issues before the CRTC in this proceeding, we have only encouragement to offer, and a few points of concern that the Canada Chapter believes, on reasonable grounds, that Commission ought to take into account. By encouragement we think the CRTC is to be commended for its questions and its focus of attention on broadband Internet access.

4. Our points are as follows:
5. The Internet is now ubiquitous and the Internet Protocol is the accepted standard on which the bulk of computer to computer communications takes place. Under conditions where computers are the basis of modern communications of all types, and are replacing former devices and media, adequate broadband Internet two-way transmission capacity is the basis of participation in the social and economic life of the country, and should be declared a basic telecommunications service.
6. The exact specifications of the level of service to be made available cannot be defined here. We think that the Commission ought to have collected by the end of this proceeding the data that would allow it to specify such matters as packet loss, jitter, and latency. It also seems sensible, if goals and targets are to be laid down, that differing levels of capacity could be specified for various regions, according to the cost of serving them. The goal should be to render access as equal as economically practical, having regard to the laws of physics and the economic difficulties that need to be addressed.
7. We would prefer that direct subsidy schemes for high cost serving areas be made part of the federal government's action plans for nation building, just as railroads were in the 19th century. ISCC's concern would be that, if the Commission is to devise targeted subsidy schemes for remote and high cost serving areas, such schemes should not comport in effect economic privileges for some carriers over others.
8. The federal government and the CRTC should confer with each other about what each plans for increasing broadband Internet connectivity, so that their respective efforts can be coordinated to some extent. Ways can be found for this to occur without diminishing the independence of the CRTC. Through its information gathering powers, the Commission has or can obtain information about high-cost serving areas that can make subsidies more effective.
9. Optical fiber will provide orders of magnitude greater communication ability than wireless; once fiber is installed there is very little reason for any other carrier to attempt to compete with the virtually unlimited capacity of optical fiber.
10. If competition is to exist in these circumstances, it is very likely to involve the capacity of smaller companies to access the huge carrying capacity of fiber through wholesale arrangements. While facilities-based competition is important, once fiber goes in to a

community, the ability and willing ness of lending institutions to finance a duplicate or triplicate wire-based infrastructure declines, and in most cases may be eliminated.

Conclusion

11. The Internet, in the sense of the Internet Protocol suite, derives from experiments in machine to machine communication in the 1960s, and was adopted as a networking standard in 1983. The Internet, in the sense of the university research network that grew from it, was privatized from the US National Science Foundation in 1994, and handed over to private companies¹. Thereafter the Internet has grown by the acceptance of it as a standard, and by the relatively light-handed regulation that allows networks to connect to each other, or not, on voluntary basis.
12. The Internet is thirty to forty years old. It has succeeded beyond anyone's expectations. It has worked itself into the fabric of modern life. Participation in modern economic and social life is unthinkable without it.
13. Spreading the benefits of this amazing system to Canadians is a job shared by the CRTC, the carriers, and the federal government. The Internet Society, Canada chapter, considers that the Commission is asking the right questions, and going in the right direction. Though the details of implementation will require the Commission's capable attention, we are confident that the time has come to declare that Internet broadband capacity is a basic telecommunications service.

Yours truly



Chairman, Internet Society, Canada Chapter

¹ Brief History of the Internet, by Leiner, Kleinrock, Cerf, Clark, Postel, Roberts and others, found at <http://www.internetsociety.org/internet/what-internet/history-internet/brief-history-internet>

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