



2 August 2023

By GCKey

Mr. Claude Doucet
Secretary General
Canadian Radio-television and
Telecommunications Commission
Ottawa, Ontario
K1A 0N2

Dear Mr. Doucet:

Subject: Telecom – Staff Letter to the Distribution List – July 26, 2023

*Re: Mandating ISP participation in Measuring Broadband Canada
("MBC") Phase 3 Fixed Wireless 50+/10+ – Request for Information*

1. **Canadian Association of Wireless Internet Service Providers**, ("CanWISP") represents Telecommunications Service Providers ("TSPs") across Canada which build, own and operate their own networks. Most of the networks are focused on rural markets and utilize fixed-wireless technologies as one of their delivery technologies.
2. Pursuant to the Staff Letter dated July 26, 2023 (the "Letter"), CanWISP hereby files its responses to the corresponding requests for information ("RFIs").

Question 1: Commission staff seeks comments on the possibility of the Commission imposing regulatory measures to mandate the participation of specific WISPs, or WISPs in general, in the MBC study, for instance by imposing a condition under section 24 of the Telecommunications Act, consistent with section 17. d. of the Order Issuing a Direction to the CRTC on a Renewed Approach to Telecommunications Policy, SOR/2023-23, 10 February 2023. For the purpose of this study, participation consists of a WISP contacting all of its 50+/10+ Fixed Wireless subscribers with subscriber engagement material provided by SamKnows.

3. CanWISP supports the Measuring Broadband Canada program.
4. CanWISP supports universally mandated ISP participation regardless of the last mile technology utilized. For further clarity, while WISPs should be subject to mandatory participation in this phase which focuses on the services they provide, participation should be mandatory for all ISPs in any class of ISP being studied, while a study of that class of ISP is in progress. This is necessary to ensure that the results of all MBC studies are based on sufficient sample sizes across Canada to make them meaningful.

Question 2: Commission staff seeks comments on which WISPs should be subject to any regulatory measures to mandate participation.

5. Please see response to question 1.
6. CanWISP is also aware of the need for 40 active whiteboxes to ensure

statistically relevant data for a given study¹. CanWISP notes that some smaller networks may not generate sufficient subscriber participation to meet this threshold. To support the provision of meaningful data, CanWISP encourages the Commission to consider exempting ISPs that do not meet a minimum number of 50/10 subscribers, based on the subscriber participation rate in all previous studies conducted to date. For example, if the typical subscriber participation rate is 5%, then $40 \div 5\% = 800$ might be an appropriate minimum number of 50/10 subscribers for mandated MBC program participation.

Question 3: Commission staff seeks comments on the reasons, with supporting rationale and evidence, preventing WISPs from participating in the study.

7. CanWISP is not aware of any reason preventing WISPs from participating in the program.

8. ISPs running small networks typically do not have full time staff dedicated to regulatory compliance. The burden of mandated participation in the MBC program is minimal regardless of company size, to the extent that it only consists of sending communications to end-users to make them aware of the program and encourage their participation. However, when it comes to demonstrating compliance to the Commission, we would ask it to make that process as simple and streamlined as possible, so as not to burden the smallest participants who have very limited resources.

¹ CRTC Report, “Measuring Broadband Canada”, dated June 2020, at p.5.

9. Thank you for the opportunity to contribute to the discussion.



Jonathan Black

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