December 8, 2015

By email to: ic.telecomsubmission-soumissiontelecom.ic@canada.ca

Clerk of the Privy Council and Secretary to the Cabinet
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Blackberry is Canada's premier high-tech company, and a global leader in secure mobile communications. I am writing to express our support for public policies promoting the development of advanced and competitive communications networks that help connect everyone to the people and things they need.

In that regard, we respectfully ask the Government of Canada to support a recent Bell petition requesting that the federal Cabinet alter a July decision by the Canadian Radio-television and Telecommunications Commission (CRTC) mandating that Bell allow resellers access to Bell's fibre networks.

It stands to reason that mandatory resale obligations will make it less attractive for Bell to commit significant new capital investments in fibre-to-the-home networks. We share Bell’s concerns that mandated access to fibre networks by resellers – companies that do not invest in or build their own fibre-to-the-home networks – undermines the economic incentives required for Bell to make significant capital investments, especially in areas where returns on those investments are challenging at the start and only achieved over the long term.

While we understand the very laudable and important goal of the CRTC to increase competition, we believe Canada and Canadian consumers would benefit far more from policies that encourage facilities-based competition rather than a form of competition based on multiple brands all using the same network on a forced-sharing basis.

Policies promoting facilities-based competition would spur investment, innovation and job creation in Canada. Today, Canada’s communications networks are world class. But there is no
doubt that ongoing, multi-billion dollar investments in expanding the reach of fibre networks are required and will help companies like Blackberry continue to develop solutions that enhance mobile computing experiences for the benefit of Canadians and our millions of customers around the world.

By overturning that part of the CRTC’s decision that mandates access to new fibre networks by resellers, the Government of Canada will encourage rather than deter multi-billion dollar infrastructure investments by Bell and other carriers. This will support investment, help create jobs and ensure more Canadians have access to the best possible broadband infrastructure, something we believe is critically important to our own ongoing success as a global leader in providing secure mobile communications.

Thank you for taking these comments into consideration.

Sincerely,

John S. Chen
Executive Chairman of the Board of Directors and Chief Executive Officer

cc:

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