Clerk of the Privy Council and Secretary to the Cabinet
Ms. Janice Charette
Langevin Block
80 Wellington Street
Ottawa, Ontario, Canada, K1A 0A3

Director General
Telecommunications Policy Branch
Industry Canada
10\textsuperscript{th} Floor
235 Queen Street
Ottawa, Ontario, Canada, K1A 0H5

Via Electronic Mail


Dear Ms. Charette, et al:

I am submitting comments on behalf of Juniper Networks, a leading provider of networking and security products used by service providers as well as enterprise customers, including nearly all of the world’s largest telecommunications companies, Internet service providers, cable operators, and Internet content providers.

The Juniper vision is to “Connect Everything. Empower Everyone.” We do not support discrimination in the provision of network services. In contrast, Juniper does support the right of service providers to determine their own business operations and investment policies. As such, Juniper would like to comment on an important issue that we believe could seriously affect investment in new fibre-to-the-home networks. It is an issue that we believe is forcing Canadian service providers to reconsider their planned spending in fibre network deployment strategies in 2016 and beyond.

The business case underpinning fibre-to-the-home deployments hit a serious roadblock when the Canadian Radio-television and Telecommunications Commission (CRTC) decided in July 2015 that Internet resellers should have compulsory access to new networks of other providers. If the CRTC decision is allowed to stand, it will cause existing services providers, like Bell Canada, to delay, or even stop, investments in smaller cities, towns and rural locations – not just in the fibre-to-the-home distribution plant, but also in the underlying network equipment needed to provide quality broadband services to the end users. Such reductions in investment will also reduce the geographic reach of fibre networks and may also exacerbate the digital
divide, as dozens of communities will not enjoy the significant economic, social and productivity benefits these networks are able to deliver. In discussion with the Canadian service providers that are Juniper clients, they have acknowledged their desire to make the best possible broadband service available to as many customers as possible, but to do this requires the Government of Canada to continue its longstanding support for facilities-based infrastructure investments and jobs.

We are therefore urging the Canadian Government to re-instate the rules which were in place prior to July, and which encouraged all Canadian service providers to make multi-year, multi-billion dollar investments in fibre-to-the-home distribution systems.

Juniper believes that such investments are essential and required so as to enable the modern network to deliver on its enormous economic promise to people, communities and business users across Canada.

Thank you for your consideration of our views.

Sincerely,

Robert B. Dix, Jr.

Vice President, Global Government Affairs and Public Policy

CC:

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