December 3, 2015

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


Dear Ms. Charest,

The purpose of this letter is to express Telesat’s support for the Petition to the Governor in Council concerning Telecom Regulatory Policy CRTC 2015-326, Review of wholesale wireline services and associated policies, filed by Bell Canada on October 20, 2015.

Since its inception in 1969, Telesat has brought essential and innovative satellite services to every part of Canada. Today, Telesat is a leading global fixed satellite services operator – the fourth largest in the world – and provides reliable and secure satellite-delivered communications solutions worldwide to broadcast, telecom, corporate and government customers worldwide. Telesat is headquartered in Ottawa and approximately 80% of our employees are based in Canada, with a large proportion working in specialized high tech positions. Over the last decade Telesat has invested over $2.2 billion in state-of-the-art communications infrastructure, and more than half of Telesat’s satellite fleet has dedicated coverage of the full Canadian land mass up to 76 degrees North latitude – serving all communities in Canada. Privately held, Telesat’s principal shareholders are Canada’s Public Sector Pension Investment Board and Loral Space & Communications Inc.

As submitted in Bell’s Petition to Cabinet, the present decision of the CRTC puts at risk significant capital investments in telecommunications infrastructure by major network service providers at a time when our economy most needs these investments. This is of great concern to Bell Canada, and it is a concern shared by Telesat as our company continues to make large capital investments in telecommunications infrastructure to support the deployment and expansion of advanced telecommunications in all parts of Canada.
Canada’s telecommunications markets are characterized by vigorous competition and are among the most advanced in the world. Among the many reasons for the success of the Canadian telecommunications system has been a willingness on the part of industry to invest in modern telecommunications facilities, along with a progressive and predictable regulatory environment. Regulatory decisions that change market conditions, or the underlying industry structure upon which investment decisions are made, undermine investor confidence and will ultimately result in the delay or cancellation of investment and will negatively impact existing and future jobs. Moreover, delays in infrastructure investment will only serve to exacerbate the digital divide, denying a significant number of Canadians the economic, social and productivity benefits these network investments are able to deliver.

If the present CRTC decision is allowed to stand, it will undermine investor confidence and create regulatory uncertainty. Telesat is therefore asking the Government to grant Bell’s requested remedy to re-instate the rules which were in place prior to July 2015.

Yours truly,

Original signed by

Ian Scott
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Regulatory and Government Affairs
Telesat Canada

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