



**Canadian Network Operators Consortium Inc.  
Consortium des Opérateurs de Réseaux Canadiens Inc.**

March 26, 2020

Mr. Ivan Mihaljevic  
President  
Bell Canada Wholesale

Dear Mr. Mihaljevic,

As you are aware, the COVID-19 crisis has put unprecedented strain on telecommunications service providers and their networks, while fundamentally changing the way that Canadians must work, learn and communicate with each other during this time of crisis. For as long as strict social distancing remains paramount, Canadians will rely heavily on Internet connectivity throughout all aspects of their day-to-day lives.

In these early stages of the pandemic, members of CNOCC have experienced record traffic levels that meet or exceed their network capacity. Furthermore, traffic levels are increasing steadily with every passing day. This poses a huge economic challenge for CNOCC members, which if not addressed, could erode their already thin margins to the point where their businesses are no longer sustainable. CNOCC and its members are very concerned that a continuation of this situation will lead to severe degradations of Internet service for Canadians – at a time when reliable connectivity is needed most.

Internet connectivity is an essential service. In our view, it is therefore incumbent on service providers to do everything in their capacity to provide high quality and affordable Internet access to Canadians throughout this crisis that has only begun to unfold.

Bell and other incumbent telecommunications service providers have announced significant retail measures aimed at providing relief to Canadians during this difficult time. In some cases, such measures include lifting Internet data caps on retail service packages. CNOCC members have also done everything in their power to offer similar kinds of relief to Canadians. At this critical juncture, we are asking Bell to take additional steps towards creating relief for Canadians by implementing temporary wholesale measures. More specifically, CNOCC is proposing the three kinds of relief outlined below.

First, CNOCC requests temporary relief aimed at alleviating wholesale capacity constraints. CNOCC proposes a measure whereby Bell shall lift the current CBB ceilings that apply to all wholesale customers. For the duration of the COVID-19 crisis, wholesale customers will be allowed to use as much of the capacity available at the router interface (e.g., 10 Gbps or 100 Gbps) as is needed to accommodate surges in consumer demand. While this measure is in effect, wholesale customers would be billed based on the total quantity of CBB increments to which they had subscribed as of March 15, 2020 until citizens are no longer required or advised to work from home. The design of this wholesale-level solution is intended to mirror the data cap relief that certain incumbent service providers have applied at the retail-level. At the end of the day, this measure benefits Canadians directly notwithstanding the existence of a wholesale intermediary.

Second, CNOC is asking your company to ensure that capacity augmentations requiring additional physical interconnections are processed as promptly as possible, with such interconnections and related augmentations being turned up as soon as possible and, in any case, no later than thirty (30) days following the order date.

Third, CNOC is requesting payment term flexibility for wholesale service invoices. CNOC members are expecting that many retail end-users will have difficulty making timely payment of invoices in light of the economic hardships created by the current circumstances. As a result, CNOC members require a reasonable amount of additional cashflow flexibility to pay invoices. CNOC proposes an additional period of sixty (60) days for payment of all invoices for wholesale high-speed access services.

On behalf of the CNOC member companies, we look forward to your reply, which given the urgency of the situation, we would appreciate receiving by April 9<sup>th</sup>. Do not hesitate to contact us to discuss any of these matters in greater detail.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeff Brownlee". The signature is written in a cursive, flowing style.

Jeff Brownlee  
Executive Director  
Canadian Network Operators Consortium