



January 11, 2019

Via email: ic.btlr-elmrt.ic@canada.ca

The Broadcasting and Telecommunications Legislative Review Panel
c/o Innovation, Science and Economic Development Canada
235 Queen Street, 1st Floor
Ottawa, Ontario K1A 0H5

**Re: Broadcasting and Telecommunications Legislative Review Panel's Call for
Comments re: Review of the Canadian Communications Legislative Framework**

Attached, please find the comments of Cisco System, Inc. ("Cisco") in response to the Call for Comments issued by the Broadcasting and Telecommunications Legislative Review Panel ("Panel") as part its Review of the Canadian Communications and Legislative Framework.

Cisco thanks the Panel for the opportunity to provide input on this important issue.

Yours truly,

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Attach.

Review of the Canadian Communications
Legislative Framework

Call for Comments

Issued by the Broadcasting and
Telecommunications Legislative Review Panel

Comment of Cisco Systems, Inc.



January 11, 2019

I. Introduction.

1. Cisco Systems, Inc. (“Cisco”) is pleased to provide the Broadcasting and Telecommunications Legislative Review Panel (“Panel”) with the following comments in response to the Panel’s *Call for Comments* as part of its review of the Canadian communications legislative framework.¹
2. Cisco designs and sells a broad range of technologies that have been powering the Internet since 1984. Across networking, security, collaboration, and the cloud, our evolving “intent”-based technologies are constantly learning and adapting to provide customers with a highly secure, intelligent platform for their digital business.
3. Cisco is deeply committed to Canada. Since 1998, Cisco has proudly operated and invested in Canada and today has approximately 1900 employees with offices in Toronto (HQ), Ottawa, Kanata, Montreal, Vancouver, Calgary, Edmonton, Winnipeg and Halifax. Canada is home to Cisco’s Kanata research center, home to over 400 of Cisco’s best engineers. In January 2016 Cisco opened its Toronto Innovation Centre, one of twelve globally and the only one for Cisco in North America. Additionally, Cisco is investing \$25M CAD in 13 academic research chairs, doing research in areas such as 5G. Every year Cisco invests approximately \$130M CAD in R&D in Canada and since 2014 has invested an additional \$50M CAD in direct and indirect venture funding in Canada. Cisco Canada also has a number of corporate social responsibility programs that are the pride of Cisco Canada employees. Our Connected North program brings real-time, video-based education and mental health and wellness services to 41 remote schools, reaching nearly 10,000 students. The program is funded by over 60 partners and Cisco has invested over \$4M CAD since 2013. Additionally, Cisco’s global Networking Academy program, now in its 20th year, develops and delivers IT courses through local schools, community colleges and universities. In September 2018, Cisco reached 200,000 students across Canada who have graduated from the program in 250 different partner organizations. Cisco’s in-kind contribution since inception in 1998 is \$98M CAD. Finally, in October 2018, Cisco launched a new mental health initiative with the Centre for Addiction and Mental Health and Deloitte to uncover IT-centric solutions that will help clinicians reach more patients, and improve access to critically needed services with a goal to improving patient outcomes.
4. Cisco commends the Panel for issuing this *Call for Comments*. As Cisco has long advised, the demand for advanced telecommunications network services in the digital age is unprecedented. Regardless of technology type, consumers want ubiquitous access to broadband services and gigabit speeds. And with each passing year, the number of devices per person is rising as homes and businesses become increasingly networked, helping Canadians consume more and more data.

¹ Broadcasting and Telecommunications Legislative Review Panel, *Review of the Canadian Communications Legislative Framework* (Sept. 24, 2018) (“*Call for Comments*”), <https://www.ic.gc.ca/eic/site/110.nsf/eng/00003.html>.

5. Indeed, Canadians rely on broadband for a variety of activities that touch upon almost every facet of daily life. Yet, not all Canadians have adequate access to high speed broadband services. In particular, consumers in rural, remote, and Indigenous communities lack access to these services more frequently than those in urban and suburban communities. To address this gap in availability, any amendments to the statute should allow policymakers to utilize all of the tools in the toolkit to expand access to broadband services in unserved and underserved communities. Such expanded access will help to bridge existing digital divides in these communities and create a truly inclusive digital society.
6. The introduction of 5G services is also expected to profoundly affect the lives of consumers and transform the Canadian economy. Yet, to realize these benefits, communications providers must be able to access passive infrastructure for the deployment of 5G-capable infrastructure. Unfortunately, there have been documented challenges in ensuring such access to date. Any amendments to the statute thus should seek to address these challenges and facilitate the deployment of 5G and other advanced broadband infrastructure.
7. The introduction of 5G networks represents only one aspect of the rapid evolution in technology that is occurring in the telecommunications industry. This evolution is leading to ever-shifting market dynamics. Given the pace of this evolution, it is far more preferable for the statute to provide regulators with general tools that may be utilized on a case-by-case basis than to lock in issue-specific policies. This is particularly true with respect to the statutory treatment of net neutrality. However, if there is a sentiment for legislative action regarding net neutrality, the preferred approach is for the adoption of flexible principles that provide guidance to regulators as opposed to inflexible statutory technical requirements and mandates.
8. A similarly flexible approach is preferred with respect to any new statutory provisions regarding accessibility and cybersecurity. With respect to accessibility, the Panel should make abundantly clear that any future accessibility requirements must be technically feasible. And with respect to cybersecurity, the Panel's recommendation should reflect that process-oriented, risk-based approaches always will be more effective than prescriptive technical requirements and mandates in addressing cyber threats.
9. Finally, the Panel may want to consider two provisions aimed at further positioning Canada as a global leader in spectrum policy. First, regulators should be provided authority to allocate or repurpose spectrum prior to decisions of the World Radio Conference ("WRC"), which is usually held at three to four year intervals, if doing so would be in the public interest. And second, the statute should be updated to reflect the importance of licensed, unlicensed, and shared spectrum paradigms. These changes will better reflect the realities of modern wireless networks and accommodate the current pace of wireless technology innovation.

II. Responses to Specific Questions

A. The Legislative Framework Should Provide Policymakers with the Necessary Tools to Promote Universal Access and Broadband Infrastructure Deployment

10. The *Call for Comments* emphasizes the extent to which Canadians rely upon advanced telecommunications networks. As the Panel accurately notes, Canadians rely on these networks “to connect, communicate, innovate, consume, study, work, and participate in Canadian society and in an increasingly global digital economy.”²
11. This reliance will only increase in the coming years. For example, according to the Cisco 2018 Visual Networking Index (“VNI”), Internet Protocol (“IP”) traffic in Canada is expected to grow 2-fold from 2017 to 2022, which is a compound annual growth rate of 17%.³ Moreover, the average number of devices and connections on a per capita basis in Canada is expected to almost double between 2017 to 2022, from 6.5 networked devices per capita to 11.0 devices.⁴
12. Given this expected increased reliance upon advanced telecommunications networks, it is therefore critical that networks are accessible to all Canadians and that facilities-based telecommunications carriers are able to efficiently deploy new infrastructure to increase the functionality, capacity, and reach of networks. As discussed in the following paragraphs, the legislative framework can facilitate the realization of these objectives by providing policymakers with the necessary tools to promote universal access and the efficient deployment of broadband infrastructure.

Q.1.1 Are the right legislative tools in place to further the objective of affordable high quality access for all Canadians, including those in rural, remote and Indigenous communities?

13. As the Panel correctly notes, enabling improved access to higher speed broadband services for Canadians in rural, remote, and Indigenous communities will help create a truly inclusive digital society and bridge existing digital divides.⁵ Current digital divides significantly affect how communities benefit from broadband. The greater the access to broadband services in a community, the greater the ability for individuals in the community to connect, communicate, innovate, consume, study, work, and participate in Canadian society and in an increasingly global digital economy. Moreover, because of the network

² *Id.*

³ Cisco, VNI Forecast Highlight Tool (“Cisco VNI Forecast”), https://www.cisco.com/c/m/en_us/solutions/service-provider/vni-forecast-highlights.html# (last visited Jan. 10, 2019).

⁴ *Id.*

⁵ *Call for Comments*, *supra* note 1.

- effect of broadband usage, Canada's ability to compete in the global digital economy will increase as more Canadian communities gain access to broadband services.
14. To enable improved access to broadband in those Canadian communities on the wrong side of the digital divide, any amendments to the statute should afford policymakers the ability to utilize all of the tools in the toolkit to spur rural broadband deployment. Two tools particularly important for policymakers are (1) the ability to rely upon a variety of funding mechanisms to support broadband deployment and service in rural, remote, Indigenous and other high cost communities, and (2) the flexibility to make funding determinations on a technology neutral basis.
 15. First, policymakers should have the ability to rely upon a variety of broadband funding mechanisms. As the Canadian Radio-television and Telecommunications Commission ("CRTC") has recognized, a lack of existing broadband infrastructure in a certain area may indicate that there is a lack of a business case for broadband deployment in that area.⁶ Areas that remain underserved are likely those that present some of the highest costs to serve and the least likelihood to be served by market forces alone. Consequently, policymakers should be afforded the opportunity to utilize a variety of funding mechanisms to promote the deployment of broadband infrastructure in these areas.
 16. For example, broadband deployment funding mechanisms that are financed from general revenues are grounded in sound public policy. These mechanisms, such as the existing Connect to Innovate program, can help spur high-speed broadband infrastructure deployment in communities where challenging geography and less dense populations present barriers to private sector investment in building infrastructure.⁷ Use of general revenues is economically rational because communications networks display classic "network effects" in that the more people who are on the network, the more valuable the network is for all. At the same time, funding mechanisms that are not dependent on annual allocations of general revenues offer a number of administrative advantages of reliability and efficiency. For example, a revolving loan fund administered by a public or quasi-public agency enables continuous low-cost lending to support initial capital expenses associated with rural broadband deployments. Low cost funding for capital investment can improve the business case enough in certain geographies to permit commercial offerings. Similarly, funding mechanisms financed by carrier contributions, such as the recently launched \$750 million Broadband Fund, provide certainty regarding the availability and level of support for recipients.⁸ Such certainty is particularly important in the context of defraying recurring operating expenses associated with broadband networks serving communities with low population density. The statute should include funding frameworks to ensure that all types of mechanisms are legally available to future Parliaments (who could choose to appropriate funding) and/or regulators.

⁶ Canadian Radio-television and Telecommunications Commission, *Development of the Commission's Broadband Fund*, Telecom Regulatory Policy CRTC 2018-377, ¶ 127 (Sep. 27, 2018) ("*CRTC Broadband Fund Decision*").

⁷ Innovation, Science, and Economic Development Canada, *Connect to Innovate*, <https://www.ic.gc.ca/eic/site/119.nsf/eng/home> (last visited Jan. 10, 2019).

⁸ See *CRTC Broadband Fund Decision*, *supra* note 6.

17. Second, any amendments made to the legislative framework should specify that policymakers have the flexibility to make funding determinations on a technology neutral basis. As technology evolves, policymakers should be able to consider all types of broadband technologies (i.e., wireline, terrestrial fixed wireless, terrestrial mobile wireless, satellite) when awarding support to address connectivity challenges in Canada's rural, remote, and Indigenous communities. Amendments to the statute that afford such flexibility will enable policies that maximize broadband deployment.

Q.1.2 Given the importance of passive infrastructure for network deployment and the expected growth of 5G wireless, are the right provisions in place for governance of these assets?

18. The introduction of 5G is expected to have a transformational effect on the Canadian economy. 5G promises to offer emerging new services at significantly faster speeds, expanded capacity, and stronger coverage. As Innovation, Science and Economic Development Canada ("ISED") recently concluded, the development and deployment of 5G in Canada is essential for the country to become a global center for wireless innovation.⁹ Moreover, the effects of 5G will extend well beyond the telecommunications industry. According to one recent report, 5G will contribute as much as \$40 billion annually to Canada's economy by 2026 and will create 250,000 permanent jobs domestically by that same year.¹⁰
19. 5G will rely upon networks that are much denser than those wireless networks that were deployed a decade ago. As opposed to macro cell towers, 5G networks are expected to be comprised substantially of small cell sites that require access to passive infrastructure (i.e., poles, ducts, and rights-of-way), both traditional and non-traditional (e.g., street lightposts). Access to this passive infrastructure in reasonable timeframes, at reasonable costs, and through reasonable permitting processes is therefore critical to the growth of Canada's 5G wireless networks, as well as continued broadband network deployment more generally.
20. Unfortunately, shared jurisdictional responsibility over certain passive infrastructure has presented challenges for the efficient deployment of 5G small cell infrastructure. Both the Government of Canada and CRTC have acknowledged these challenges.¹¹

⁹ ISED, *Consultation on Releasing Millimetre Wave Spectrum to Support 5G*, SLPB-001-17, ¶ 3 (June 2017).

¹⁰ News Release, Accenture, *5G Wireless Could Add \$40 Billion in Annual GDP and 250,000 Permanent New Jobs to Canadian Economy by 2026, Accenture Report Finds*, (June 19, 2018), <https://newsroom.accenture.com/news/5g-wireless-could-add-40-billion-in-annual-gdp-and-250000-permanent-new-jobs-to-canadian-economy-by-2026-accenture-report-finds.htm>.

¹¹ See Ian Scott, Chairperson & CEO, CRTC, Remarks to the Annual Conference of the Canadian Chapter of the International Institute of Communications (Nov. 1, 2018) ("Scott Remarks"), <https://www.canada.ca/en/radio-television-telecommunications/news/2018/11/ian-scott-to-the-annual-conference-of-the-canadian-chapter-of-the-international-institute-of-communications.html>

21. To facilitate the growth of 5G and other advanced broadband networks, the legislative framework thus must strike a balance that ensures access to passive infrastructure by communications providers while continuing to allow for local control in this area. Ideally, localities will support 5G deployment in their communities with prompt and reasonable access to passive infrastructure. However, in situations where this does not occur, there must be access to a prompt, reasonable and predictable decision-maker.¹² Therefore, the legislative framework must include a mechanism to resolve disputes emanating from this balance. Put simply, the deployment of 5G and other advanced broadband networks in Canadian communities is too important to be delayed by such disputes.
22. To guide its recommendation on resolving the challenges associated with access to passive infrastructure, the Panel should look to the recent proposal by CRTC Chairman Ian Scott.¹³ Specifically, Chairman Scott proposed that the legislative framework be amended to empower the CRTC to set guidelines for municipal and provincial governments and, even more importantly, to resolve disputes over access to passive infrastructure.¹⁴ An expansion of the CRTC's authority and role along these lines will help resolve those instances in which local authorities impede access to the passive infrastructure necessary for the growth of 5G and other advanced broadband networks. In addition, the CRTC should be directed by statute to establish a dispute resolution process that is transparent, fair and prompt.
23. Finally, even if the CRTC's authority is not expanded to allow for the resolution of disputes over access to passive infrastructure, the Panel still should recommend a significant role for the CRTC. CRTC-established guidelines regarding passive infrastructure, as proposed by Chairman Scott, and the collection of data by CRTC regarding access to passive infrastructure would help facilitate best practices and bring transparency to any egregious practices by any localities.

B. The Legislative Framework Should Avoid Overly-Prescriptive Statutory Requirements

Q.3.1 Are current legislative provisions well-positioned to protect net neutrality principles in the future?

24. Cisco commends the Panel for recognizing that the legislative framework must “remain both flexible enough to deal with continuing technological and market changes, and responsive to the need to ensure that all Canadians benefit in a timely way from competitive, innovative and affordable broadband infrastructure.”¹⁵ Today, the

¹² Reliance on the courts for decision-making will fail to deliver prompt resolution to disagreements, and in any event is an expensive barrier to 5G.

¹³ Scott Remarks, *supra* note 11.

¹⁴ *Id.*

¹⁵ *Call for Comments*, *supra* note 1.

telecommunications industry is experiencing a rapid evolution in technology. This evolution is in turn leading to ever-shifting market dynamics. Issues that appear to be looming public policy problems at one moment in time may disappear quickly with the development of new technology or new market dynamics.

25. The speed of the evolution of telecommunications networks is evidenced in Cisco's 2018 VNI. For example, Cisco predicts that more IP traffic will cross global networks in 2022 than in all prior years combined up through 2016.¹⁶ In other words, more traffic will be created in 2022 than in the 32 years since the internet started.¹⁷ Moreover, the average fixed broadband speed will grow 2.3-fold from 2017 to 2022 in Canada, from 37.6 Mbps to 85.6 Mbps, and the average mobile speed will grow 3 fold during this time period, reaching 69 Mbps by 2022.¹⁸ To cope with these changes, the very fabric of the network is changing. Not only is industry introducing much more powerful network management tools, but an increasing amount of traffic will stay at the edge of the network for efficiency and latency reasons. In Canada, 90 percent of traffic will be attributed to Content Delivery Networks by 2022, an indication that traffic will be geographically dispersed and would not be centrally backhauled. Multi-access Edge Computing, or Mobile Edge Computing, will also be a feature of 5G networks that again will enable operators to better manage the coming flood of data associated future Internet of Things applications by keeping data traffic at the edges of networks.
26. In light of this technological and network evolution, it is thus far more preferable to provide regulators with generic tools that may be utilized to address consumer-impacting problems on a case-by-case basis than it is to lock in issue-specific statutory policies to address future, currently unknown problems. This holds particularly true with respect to the issue of net neutrality. Indeed, past experiences in this policy arena and new and emerging technologies suggest that prescriptive and detailed statutory requirements for net neutrality have the potential to do more harm than good. Moreover, depending on the substance of such a statutory provision, it may even lead to unintended consequences as technology continues to evolve.
27. However, if there is a sentiment for legislative action, Cisco encourages the adoption of broad, flexible principles that could guide regulators should future action be required to ensure net neutrality protections. Such principles would include:
 - *Transparency requirements:* Fixed and mobile broadband providers must disclose the network management practices, performance characteristics, and terms and conditions of their broadband services.

¹⁶ Cisco, *Cisco Predicts More IP Traffic in the Next Five Years Than in the History of the Internet* (Nov. 27, 2018), <https://newsroom.cisco.com/press-release-content?type=webcontent&articleId=1955935>.

¹⁷ *Id.*

¹⁸ Cisco VNI Forecast, *supra* note 3.

- *Prohibition on blocking*: Fixed broadband providers may not block lawful content, applications, services, or non-harmful devices, and mobile broadband providers may not block lawful websites or applications that compete with the provider's voice or video telephony services.
 - *Prohibition on unreasonable discrimination*: Fixed broadband providers may not unreasonably discriminate in transmitting lawful network traffic.
 - *Reasonable network management*: Broadband providers may engage in practices primarily used for and tailored to achieving a legitimate network management purpose.
28. The utilization of broad principles such as these will ensure a statutory balance that remains flexible enough to accommodate continuing technological and market changes while providing regulators the tools needed to address any unforeseen future developments to ensure that all Canadians continue to enjoy the benefits of broadband.

C. The Principle of Technical Feasibility Should Be Reflected in Any New Accessibility Provisions

Q.4.1 Are further improvements pertaining to consumer protection, rights, and accessibility required in legislation?

29. Cisco is well respected for its unparalleled expertise in communications and networking technologies. By creating innovative solutions through combining the power of software, hardware, and the network, Cisco makes collaboration among users more effective, comprehensive, and less complex – including among users with disabilities.
30. Cisco thus commends the Panel for noting the importance of enabling access to broadband services for Canadians with disabilities.¹⁹ To the extent that the Panel ultimately recommends that new provisions regarding accessibility should be added to the legislative framework, the Panel's recommendation should make abundantly clear that any future accessibility statutory provisions must be technically feasible to implement.

D. The Legislative Framework Should Reflect that Process-Oriented, Risk-Based Approaches are the Most Effective Means of Addressing Cybersecurity Threats

Q.5.1 Keeping in mind the broader legislative framework, to what extent should the concepts of safety and security be included in the *Telecommunications Act/Radiocommunication Act*?

¹⁹ *Call for Comments*, *supra* note 1.

31. In today's connected world, cyber risks include an ever-evolving host of threats. These threats can come in the form of physical intrusions at network facilities, attempts to circumvent weak firewalls, and phishing, malware, and hacking campaigns, among others. At the consumer level, a cybersecurity breach can result in everything from identity theft, to extortion attempts, to the loss of important personal data. At the enterprise level, cyber attacks threaten critical infrastructure like communications networks, power plants, hospitals, and financial service companies. Securing these and other organizations is essential to keeping our society functioning. Indeed, according to Cisco's 2018 VNI, Canada had the second highest per capita costs of data breaches globally in 2017, at \$202.²⁰
32. Given the various forms of cyber threats, successful cybersecurity approaches are implemented in multiple dimensions. These dimensions include, but are not limited to, physical site security, consumer/user cybersecurity education, authentication security, and device and network-based security. The safeguards in each dimension complement each other when defending against cyber incursions.
33. Cisco is a world leader in developing strategies for defending against cybersecurity threats. The most effective strategies for defending against cyber incursions involve continually evaluating and re-evaluating the risks in the environment, staying abreast of new and emerging threats (including through the controlled sharing of information), and responding as quickly as possible when threats present themselves. These strategies, if part of a culture that prioritizes security, represent both the best defense and offense against cyber attacks.²¹
34. Today, the Canadian Cyber Threat Exchange ("CCTX") serves as the private sector hub for cybersecurity threat information sharing and analysis. The activities of CCTX will be complemented by the Canadian Centre for Cyber Security, a public sector initiative established in 2018 to serve as the focal point for coordinating federal cybersecurity efforts with the private sector. Given the ubiquitous and evolving nature of cybersecurity threats, process-oriented, risk-based approaches like those employed by CCTX and the Canadian Centre for Cyber Security always will be more effective than prescriptive technical requirements and mandates in addressing these threats. As a general rule, Canada thus should continue to employ a risk-based approach that relies upon consensus-based standards and risk management best practices to identify and protect against cybersecurity risks and to detect, respond to, and recover from cybersecurity events. To the extent that

²⁰ Cisco, *Cisco Visual Networking Index: Forecast and Trends, 2017–2022*, White Paper at 16 (Nov. 26, 2018), <https://www.cisco.com/c/en/us/solutions/collateral/service-provider/visual-networking-index-vni/white-paper-c11-741490.pdf>.

²¹ See United States-Mexico-Canada Agreement, at Article 19.15.2 (Nov. 30, 2018), <https://international.gc.ca/trade-commerce/assets/pdfs/agreements-accords/cusma-aceum/cusma-19.pdf> (Definition of Cybersecurity: "Given the evolving nature of cybersecurity threats, the Parties recognize that risk-based approaches may be more effective than prescriptive regulation in addressing those threats. Accordingly, each Party shall endeavor to employ, and encourage enterprises within its jurisdiction to use, risk-based approaches that rely on consensus-based standards and risk management best practices to identify and protect against cybersecurity risks and to detect, respond to, and recover from cybersecurity events.")

the Panel makes any recommendation on addressing cybersecurity, the recommendation should reflect the overwhelming benefits of this approach.

E. While the Overall Legislative Framework Has Enabled Canada to Emerge as a Global Leader on Spectrum Policy, the Panel Should Consider Two Modifications that Would Modernize the Current Framework

Q.6.1 Are the right legislative tools in place to balance the need for flexibility to rapidly introduce new wireless technologies with the need to ensure devices can be used safely, securely, and free of interference?

35. The current legislative framework has enabled Canada to emerge as a global leader in spectrum policy. In light of this success, the Panel should refrain from any significant changes to this framework. However, the Panel may wish to consider two provisions aimed at modernizing the statute to reflect the current state of technological innovation.
36. First, regulators should be provided authority to allocate or repurpose spectrum prior to any decision at the WRC if doing so would be in the public interest. While international harmonization of spectrum policies is important, requiring WRC action as a condition precedent for proposals to allocate or repurpose spectrum bands may cause Canada to fall behind globally in the deployment of new technologies. WRC meetings convene every 3-4 years. Agendas are set years in advance, and country and regional positions are fixed well in advance of the meeting. These cycles do not align with the development of technology by industry and, for countries that wait for WRC action, can put those countries in the position of “just watching” as new technology is deployed elsewhere. The legislative framework should be modernized to afford regulators the discretion to take appropriate actions prior to any WRC decisions, including proposing allocations or adopting new allocations. This authority will help to balance the benefits of international spectrum harmonization against Canada’s public interest benefit of deploying new wireless services prior to a WRC allocation.
37. Second, the statute should be updated to reflect the importance of licensed, unlicensed, and shared spectrum paradigms. As a matter of national policy, regulators should administer the Canadian Table of Allocations to support licensed, unlicensed and shared spectrum opportunities. All three paradigms will be important going forward.

III. Conclusion.

38. Cisco thanks the Panel for the opportunity to comment on the *Call for Comments*. In particular, we commend the Panel for its commitment to reviewing the Canadian communications legislative framework with a view towards ensuring that the Canadian communications sector achieves world-class standards.

Respectfully submitted,

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