



24 October 2022

Claude Doucet
 Secretary General
 CRTC
 Ottawa, ON K1A 0N2

By GIC key

Dear Secretary General,

Re: *Call for comments on an application by Bell Canada, Cogeco Communications Inc., Bragg Communications Incorporated, carrying on business as Eastlink, and Saskatchewan Telecommunications regarding the increase of the maximum retail price of the basic service, Broadcasting Notice of Consultation CRTC 2022-267 (Ottawa, 28 September 2022) – Procedural Request regarding information submitted by individual broadcasters in this proceeding*

1. The Forum for Research and Policy in Communications (FRPC) is asking that the CRTC place additional information on the public record of the above-noted proceeding to provide interested parties with facts that are directly relevant to the proceeding.
2. The CRTC has asked three sets of questions of different broadcasters in this proceeding:

Date of and CRTC questions	Broadcasters asked to respond	DM#	Response date
25 February 2022 1. “Number of subscribers to the basic package”	Eastlink	DM#4166950	11 March 2022
	Cogeco Communications	DM#4167194	11 March 2022
	Saskatchewan Telecommunications	DM#4166814	11 March 2022
	BCE Inc.	DM#4167199	11 March 2022
21 March 2022 e-mail 2. Number of subscribers whose subscription fee is \$25 3. Number of subscribers who bundle their television service with another service (such as wireline telephone or Internet) 4. Number of subscribers who bundle their television service with another service and whose subscription fee is \$25	Eastlink	DM#4171944	25 March 2022
	Cogeco Communications	DM#4173046	29 March 2022
	Saskatchewan Telecommunications	DM#4171951	25 March 2022
	BCE Inc. (note that in this response BCE corrected information it had provided in its 11 March 2022 response [DM#4167199])	DM#4171955	25 March 2022
13 April 2022 e-mail and Appendix 2 of BNoC 2022-267 5. Total number of basic package subscribers 6. Number of basic package subscribers who do not receive a credit to their account (ex: from a promotion or bundling) 7. Number of basic package subscribers who bundle their television service with another non-television service (such as wireline telephone or Internet) 8. Number of basic package subscribers who bundle their television service with another non-	Eastlink	DM#4181509	22 April 2022
	Cogeco Communications	DM#4181351	21 April 2022
	Saskatchewan Telecommunications	DM#4182053	22 April 2022
	BCE Inc.	DM#4182063	22 April 2022
	Québecor on behalf of Vidéotron	DM#4252342	12 October 2022
	Rogers Communications Inc.	DME4252086	12 October 2022
	Shaw Communications Inc.	DM#4253729	[undated]
	Telus Communications Inc.	DM#4252410	12 October 2022

3. When broadcasters filed their responses with the CRTC, each requested that the CRTC grant confidentiality to their individual response to the CRTC’s questions.

4. The Forum respectfully requests that the CRTC place the aggregate of the respondents' individual answers to the three sets of questions, on the public record: being for each of questions 1 through 4, the sum of the responses by Eastlink, Cogeco, Sasktel and BCE; and for each of questions 5 through 8, the sum of the responses by Eastlink, Cogeco, Sasktel, BCE, Québecor, Rogers, Shaw and Telus.
5. The Forum notes that the aggregated answers obtained by the CRTC from the applicants and the designated broadcasters are relevant to the 2022-267 proceeding because – apart from the fact that the answers are relevant because the CRTC asked the questions – the aggregated responses provide evidentiary context needed to evaluate the applicants' arguments and evidence in support of their application, as well as the impact of the application whether granted, denied or granted with amendments.
6. The Forum also notes that while each broadcaster asked the CRTC to not make public the information each submitted separately to the Commission, none sought confidentiality for an aggregation of the information they provided.
7. Aggregating the individual responses to each question would continue to ensure that the individual answers are not disclosed to the public, and would therefore not result in material financial harm to individual respondents.
8. Should the CRTC grant this request, the Forum notes that the deadlines set out in BNoC 2022-267 may become material, as the interveners who submitted the 300 interventions now posted on the CRTC's website will not have had access to relevant evidence aggregated to the level of the four applicants and the four designated broadcasters. The CRTC could limit this disadvantage either by extending the deadlines in the proceeding by an additional week when it publishes the aggregated data or by varying its procedural rules to permit parties to comment on the newly aggregated data in the reply phase.

Thank you for your consideration of this request.

Sincerely yours,



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