

# **CRTC 2017- 450**

## **INTERVENTION OF CYBERA INC.**

### **REVIEW OF THE RESELLER REGISTRATION OBLIGATION**

File number: 1011-NOC2017-0450

#### **Background**

1. Cybera is the not-for-profit, technology-neutral agency responsible for accelerating high-tech adoption in Alberta. One of Cybera's core roles is the operation of Alberta's Research and Education Network. This is the dedicated network for unmetered, not-for-profit traffic used by Alberta's schools and post-secondary institutions to connect to other research institutions around the world.
2. Cybera receives both provincial and federal government funding to spearhead pilot projects that improve efficiencies and the competitiveness of Canadian institutions and businesses, and support international-level research. It is guided by a strategic leadership team, and is home to internationally recognized cloud and networking experts, who work together to build cloud infrastructure, data storage, and advanced networking solutions.

#### **View on Registration Exemptions**

3. In determining whether an entity should be exempt from the registration obligation, the Commission should consider an entity's size, budget, purpose, primary business activity, portion of the entity's business activities dedicated to providing telecommunications services, and their telecommunications user or customer base.
4. Non-carrier organizations that operate private business or enterprise networks for the purpose of providing users with a paid or unpaid connection to the internet, whether via wifi or a wired network, should not be required to register. These organizations could include universities, colleges, hospitals, hotels, airports, and internet cafés that provide internet access services to staff, students or general customers of these facilities. The administrative burden of registration is disproportionate to the size and nature of these organizations, and would not provide the Commission with meaningful data for fulfilling administrative functions or policy objectives.

#### **Request for Telecommunications Service Provider Category**

5. Cybera agrees that organizations providing internet access services have a responsibility to comply with the Commission's consumer safeguard obligations, as well as contribute to the Commission's ability to monitor and better understand the telecommunications ecosystem in Canada. However, some organizations providing internet access services are fundamentally different from the "reseller" entities that have historically been required to register.
6. These entities may be operated on a non-profit or charitable basis, have unique fee structures which are independent of commercial internet service providers, and unique customer or member communities. For example, Research and Education Networks (R&E Networks) are specialised network operators dedicated to supporting the needs of research and education institutions, and are operated based on cost-recovery models.
7. In Cybera's opinion, data collected about Research and Education Networks would not contribute to the conventional administration of contribution regimes, international licensing, or factor meaningfully into decisions about services for which the Commission currently sets fees. As such, Cybera requests a new telecommunications services provider category with data collection requirements that are proportionate and relevant to the size and intent of Research and Education Networks.

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CYBERA

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