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Mr. Claude Doucet, Secretary General  
Canadian Radio-television and Telecommunications Commission  
1 Promenade du Portage  
Gatineau, Quebec J8X 4B1  
5 June 2020

**RE: Rogers Communications Canada Inc. ("Rogers") – Access Services Tariff 21530 - Tariff Notice (TN 67) and Tariff Notice (TN 67A)—TPIA Tariff**

Dear Mr. Doucet:

1. TekSavvy Solutions Inc. ("TekSavvy") submits this intervention regarding Rogers' unannounced implementation of a technical Internet traffic management practices ("ITMP") and also regarding Rogers' Tariff Notice No. 67 ("TN 67") dated 6 May 2020 and Tariff Notice No. 67A ("TN 67A") dated 20 May 2020 (collectively referred to as "the Tariff Notices").

2. The descriptions of the ITMP in TN 67 and TN 67A are identical other than the word "temporarily" that was added in TN 67A. The Tariff Notices described the ITMP as:

During times of emergency or high demand, Rogers may apply internet traffic management practices (ITMP) to Internet Service (IS) to ensure all end users have access to in-demand resources. During these periods, any end-user whose disproportionate consumption of shared resources required for internet service is negatively impacting the access to service by other end-users, may have their service affected. Rogers maintains the ability to temporarily constrain the affecting end user's access to the shared resources, regardless of the application used. As a result of this ITMP, other end-users would see improved access to the Internet service whereas the affected end-user would see a restriction on their internet speed for a period of time.<sup>1</sup>

3. The Tariff Notices—but not the proposed tariff pages themselves—refer to Rogers' Network Management Policy<sup>2</sup> for additional details regarding the ITMP. In particular, TN 67A states,

As a result of the current emergency situation and to safeguard the access of all retail and wholesale end users to high-speed services, Rogers is providing this TN jointly with the disclosure of technical ITMPs to its retail customers. Rogers' ITMP disclosure can be found at:

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<sup>1</sup> Rogers Communications Canada Inc., Tariff Application 0067, 6 May 2020.

<sup>2</sup> Rogers Network Management Policy, <https://www.rogers.com/cms/pdf/Rogers-Network-Management-Policy-en.pdf>.

<https://www.rogers.com/cms/pdf/Rogers-Network-Management-Policy-en.pdf>

4. That web page as accessed on 3 June 2020 described the ITMPs in significantly more detail than what is provided in the proposed tariff pages.
  5. Telecom Regulatory Policy CRTC 2009-657<sup>3</sup> established the ITMP framework (the “framework”), constituting guidelines for the disclosure of Internet traffic management practices. The goals of the framework are to ensure transparency, innovation, clarity, and competitive neutrality.<sup>4</sup> The ITMP framework includes clear requirements for notice, disclosure, the equal application of ITMPs to retail- and wholesale-based end-users (termed “primary ISPs” and “secondary ISPs” in the ITMP framework). The ITMP framework also includes a clear exception for ITMPs that are required in certain urgent situations. It is a comprehensive regime with clear requirements. As detailed below, Rogers failed to meet its obligations under the ITMP framework.
- A. Rogers concedes that the ITMP framework applies to these ITMPs**
6. It cannot be ignored that Rogers filed the Tariff Notices in the context of an ongoing global pandemic that has had an impact on network usage patterns in Canada. Indeed, as noted above, Rogers was presumably referencing the covid19 pandemic in their TN 67A when they wrote that “As a result of the current emergency situation and to safeguard the access of all retail and wholesale end users to high-speed services”, they were choosing to ignore the ITMP framework’s clear requirement to provide notice of the ITMPs to wholesale-based providers.
  7. TekSavvy acknowledges that the ITMP framework does not address “ITMPs used only for the purpose of network security, nor those employed temporarily to address unpredictable traffic events (e.g. traffic surges due to global events and failures on part of an ISP’s network) in order to protect network integrity.”<sup>5</sup> To be clear, if Rogers were employing this ITMP only for the purpose of network security or temporarily to address unpredictable traffic events in order to protect network integrity, it would not be required by the ITMP framework to provide notice to end-users or wholesale customers or to file a tariff notice with the Canadian Radio-television and Telecommunications Commission (“CRTC”) for approval of the ITMP. However, despite referencing the covid19 pandemic as a rationale not to provide notice, Rogers has not claimed that it is applying the ITMP for these reasons.
  8. On the contrary, given that Rogers filed tariff applications with the Commission regarding the ITMP, notified its own end users of the ITMP in its Network Management Policy<sup>6</sup>, and has not advised that the ITMP is being applied for purposes that would render the

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<sup>3</sup> Review of the Internet traffic management practices of Internet service providers, Telecom Regulatory Policy CRTC 2009-657, 21 October 2009, <https://crtc.gc.ca/eng/archive/2009/2009-657.htm> [“ITMP framework”, “the Framework”].

<sup>4</sup> ITMP framework, at pages 1-2.

<sup>5</sup> ITMP framework, at para 45.

<sup>6</sup> Rogers Network Management Policy, <https://www.rogers.com/cms/pdf/Rogers-Network-Management-Policy-en.pdf>.

framework not applicable, TekSavvy understands Rogers to concede that the ITMP framework does apply to this ITMP.

9. Given that the ITMP framework applies, certain requirements therefore apply such as the requirement to consider whether the ITMP has a “significant and disproportionate impact on secondary ISP traffic”;<sup>7</sup> the requirement to provide notice;<sup>8</sup> and the requirement to include at least a minimum amount of information in that notice<sup>9</sup>. As further discussed below, Rogers has failed to meet its obligations under the ITMP framework in each of these respects.

## **B. Rogers has not explained why the ITMPs are necessary**

10. On 14 April 2020, Rogers advised TekSavvy that it began applying an ITMP that same day. Rogers told TekSavvy that the ITMP affected only end-users responsible for high amounts of upload traffic. Rogers referred to the ITMP as the “fair use trial” and has continued to refer to it as as “trial” ever since.<sup>10</sup>
11. Periodically as Rogers applied the ITMP, it notified TekSavvy of the individual end-users who were affected. Upon investigation, TekSavvy found that end-users with Internet upload speeds as low as 2 Mbps were affected by the ITMP. In some cases, affected end-users generated as little as 100 MB of upload traffic on the day(s) Rogers applied the ITMP to their connections.<sup>11</sup>
12. TekSavvy notes that the Tariff Notice does not describe ITMPs they applied before 6 May 2020, the proposed effective date of TN67 and TN 67A. TekSavvy is aware that Rogers may have considered the ITMPs that were applied from 14 April to 5 May 2020 to have been necessary for the purpose of network security, or temporarily to address unpredictable traffic events in order to protect network integrity. If so, TekSavvy acknowledges that the ITMP framework would not have applied to those ITMPs. However, given the transparency goals of the ITMP framework and the fact that the ITMP in the Tariff Notices is clearly related to those earlier ITMPs, Rogers ought to have a minimum disclosed those earlier ITMPs and explained their relationship to the ITMPs in the Tariff Notices.
13. According to the updates provided by Rogers, it applied ITMPs on at least 23 separate occasions from 14 April 2020 to 4 June 2020, affecting approximately 1600 TekSavvy end-users.

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<sup>7</sup> ITMP framework, at para 84.

<sup>8</sup> ITMP framework, at para 91.

<sup>9</sup> ITMP framework, at para 94.

<sup>10</sup> See for instance public discussion of Rogers’ ITMPs at <https://www.dslreports.com/forum/r32773384-Rogers-admits-to-throttling>.

<sup>11</sup> More specifically, the ITMPs are applied to the Rogers TPIA access services that TekSavvy purchases on a wholesale basis over which TekSavvy then delivers Internet services to those end-users.

14. Upon investigation TekSavvy found that, on the same day that Rogers filed the Tariff Notices, Rogers changed the ITMP somewhat: Although it still affects end-users that generate as little as 100 MB of upload traffic, the ITMP was no longer being applied to upload speeds lower than 10 Mbps.
15. Given that Rogers is currently applying the ITMP, and Rogers states that it will only apply the ITMP during times of emergency or high demand, it is reasonable to infer that, in Rogers' view, the ongoing covid19 pandemic and the increase in wireline Internet usage<sup>12</sup> continues to constitute a time of emergency or high demand. In TekSavvy's submission, that is not a sustainable position in light of network patterns and Rogers' public statements about the health of its network.
16. The disruptions caused by covid19 largely began in the middle of March.<sup>13</sup> Canada was largely at home, relying on residential wireline Internet services to stay employed, stay educated, and stay in touch with the rest of the world and their loved ones.
17. On 22 April after Rogers advised TekSavvy that it was applying ITMPs, Rogers' President, Chief Executive Officer & Director Joe Natale boasted about how Rogers network has fared well, how quickly it has been able to add capacity to its network and its subsequent ability to offer its 1 Gbps Internet package (up to 1 Gbps download and 30 Mbps upload speeds) across its entire footprint on a more consistent basis<sup>14</sup>.
18. However, without notice to the Commission, Rogers was at that time already in the process of "trialing" ITMPs. On 6 May, Rogers filed the Tariff Notices introducing an ITMP for use during times of emergency or high demand and began to apply it immediately.
19. Meanwhile, Internet usage began normalizing as early as 20 April.<sup>15</sup>

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<sup>12</sup> The Star, *Providers can handle Canada's jump in daily internet usage*, 17 March 2020, <https://www.thestar.com/business/2020/03/17/providers-can-handle-canadas-jump-in-daily-internet-usage.html>; Canadian Internet Registration Authority ["CIRA"], *Q&A: IVP Managers explain how COVID-19 has changes internet usage in Canada*, 20 April 2020, <https://www.cira.ca/blog/corporate/qa-ixp-managers-explain-how-covid-19-has-changed-internet-usage-canada>; Canadian Wireless Telecommunications Association ["CWTA"], "Managing Networks in Unprecedented Times", 25 May 2020, <https://www.cwta.ca/wp-content/uploads/2020/05/English-Managing-Networks-in-Unprecedented-Times-May-25.pdf>.

<sup>13</sup> See for example Office of the Premier, *Statement from Premier Ford, Minister Elliot and Minister Lecce on the 2019 Novel Coronavirus (COVID-19)*, 12 March 2020, <https://news.ontario.ca/opo/en/2020/03/title.html> in which the Ontario provincial government ordered all publicly funded schools to remain closed following March break; CWTA, *Managing Networks in Unprecedented Times*, 25 May 2020, <https://www.cwta.ca/wp-content/uploads/2020/05/English-Managing-Networks-in-Unprecedented-Times-May-25.pdf>.

<sup>14</sup> Rogers Communications Inc., *First Quarter 2020 Results Conference Call Transcript*, 22 April 2020, at pages 16-17, <https://1vjoxz2ghhkcity8c1wjich1-wpengine.netdna-ssl.com/wp-content/uploads/2020/01/Rogers-Q1-Call-Transcript.pdf>.

<sup>15</sup> CIRA, *Q&A: IVP Managers explain how COVID-19 has changes internet usage in Canada*, 20 April 2020, <https://www.cira.ca/blog/corporate/qa-ixp-managers-explain-how-covid-19-has-changed-internet-usage-canada>; CWTA, *Managing Networks in Unprecedented Times*, 25 May

20. From the date when TN 67 was filed on 6 May, Rogers applied the ITMP to TekSavvy end-users' services at least 18 times, including on 13 consecutive days. Rogers began applying the ITMP more frequently after 6 May, after Internet usage had begun to normalize.
21. To the best of TekSavvy's knowledge, Rogers was not applying any ITMPs before 14 April 2020, weeks after Canada and ISPs began feeling the effects of covid19.
22. TekSavvy challenges Rogers' stated rationale that the ITMP is intended to address times of emergency and high usage given that Rogers did not begin applying it until after Internet usage patterns had already begun to normalize and continues to apply it as we progress away from the initial effects of covid19 on networks. Today, the ITMP is being applied to end-users who generate as little as 100 MB of upload traffic, and Rogers has expanded the availability of packages with higher upload speeds.
23. In short, Rogers can't have it both ways. If they were forced on 14 April 2020 to apply ITMPs without notice in order to protect network security or network integrity in light of unpredictable traffic events (*i.e.* in the short term due to covid19), then surely the normalizing network demands since then ought to have reduced the importance of reliance on ITMPs on an ongoing basis. The fact that Rogers has rolled out faster upload speeds strongly suggests that Rogers either does not actually need to use ITMPs in order to manage network capacity or that they are relying on the ITMPs in order to nominally launch higher speeds that they are not prepared to or able to actually support by investing in network capacity.

**C. The ITMPs have a significant and disproportionate impact on secondary ISP traffic**

24. The ITMP framework contemplates that technical ITMPs applied by primary ISPs to their wholesale services can adversely affect a secondary ISP's provision of retail Internet services.<sup>16</sup> As such, the ITMP framework provides three types of technical ITMPs the Commission considers for the purpose of analyzing the impact if ITMPs on secondary ISPs:
  - 1) ITMPs that are not more restrictive than the primary ISP's treatment of its own retail Internet services and that do not have a significant and disproportionate impact on secondary ISP traffic;
  - 2) ITMPs that are more restrictive than those applied by a primary ISP to its own retail Internet services; and
  - 3) ITMPs that, while not more restrictive than those applied to the primary ISP's retail Internet services, could have a significant and disproportionate impact on secondary ISP traffic.<sup>17</sup>

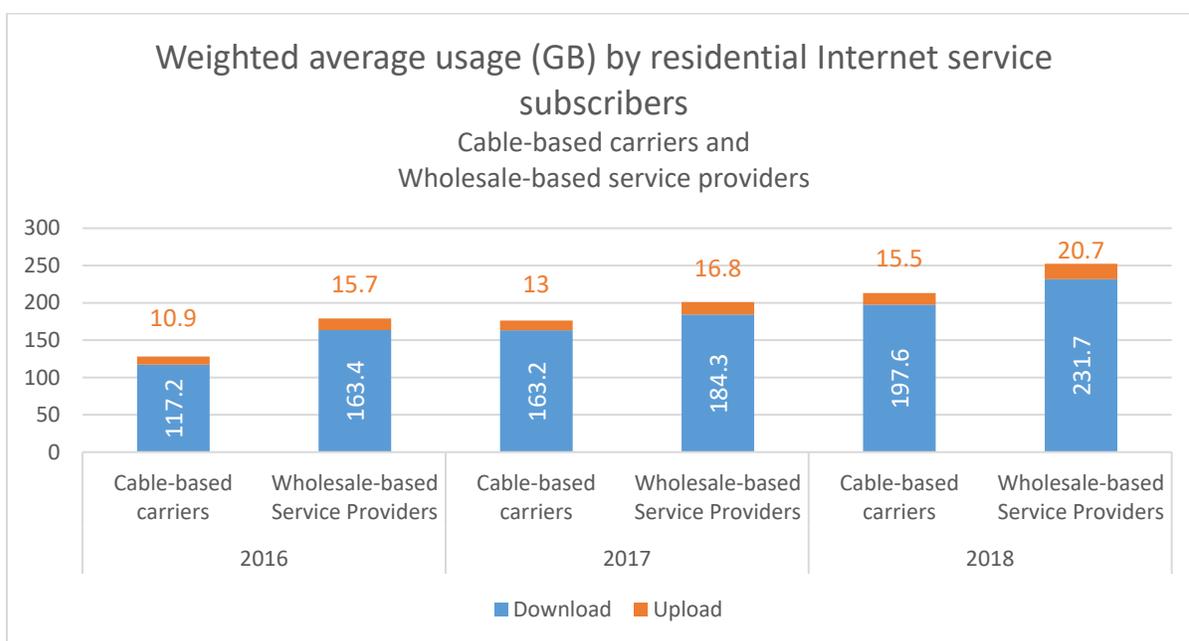
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2020, <https://www.cwta.ca/wp-content/uploads/2020/05/English-Managing-Networks-in-Unprecedented-Times-May-25.pdf>.

<sup>16</sup> ITMP framework, at para 79.

<sup>17</sup> ITMP framework, at para 80.

25. Depending on the type of ITMP, the Commission’s approval may or may not be required before it is applied by the primary ISP to their wholesale services.<sup>18</sup>
26. In the supporting documentation for both Tariff Notices (“Tariff Terms and Conditions”), Rogers submits that its technical ITMPs apply the same restrictions to its wholesale end-users as to its retail end-users and claims that prior Commission approval of the ITMP is not required.<sup>19</sup> While Rogers does not explicitly say so, this suggests that Rogers considers the ITMP to be the first type of ITMP that does not have a significant and disproportionate impact on secondary ISP traffic.
27. In TekSavvy’s submission, the ITMPs are in fact the third type described in the ITMP framework: They are applied evenly to retail and wholesale customers, but they have a significant and disproportionate impact on secondary ISP traffic. The reason for this, in short, is that wholesale end-users generate more traffic than Rogers’ retail end-users.
28. The Communications Monitoring Report 2019 (“2019 CMR”) indicates that wholesale end-users generate a greater amount of Internet traffic than retail end-users<sup>20</sup>. In fact, for each year since 2016 end-users of wholesale-based service provider have consumed significantly more data than end-users of other service providers including cable-based carriers.<sup>21</sup>



<sup>18</sup> ITMP framework, at paras 81-84.

<sup>19</sup> Rogers Communications Canada Inc., Tariff Application 0067, 6 May 2020, *Rogers TN 67 - Tariff Terms and Conditions*, and Rogers Communications Canada Inc., Tariff Application 0067A, 20 May 2020, *Rogers TN 67 A - Tariff Terms and Conditions*.

<sup>20</sup> CRTC, *Communications Monitoring Report 2019*, January 2020, [“2019 CMR”], <https://crtc.gc.ca/pubs/cmr2019-en.pdf>, Figure 9.15 at page 267.

<sup>21</sup> CRTC, 2019 CMR, <https://crtc.gc.ca/pubs/cmr2019-en.pdf>, Figure 9.15 at page 267.

29. Rogers Network Management Policy describes that its ITMP will only be applied to customers engaged “in a volume of upload activity over a sustained period of time such that this usage negatively impacts, or is likely to negatively impact, the Internet experience for other customers”<sup>22</sup>. Given that wholesale-based service providers generate more upload traffic than cable-based carriers such as Rogers, it follows that an ITMP that specifically targets usage rates will have a significant and disproportionate impact on wholesale-based providers.
30. Under the ITMP framework, the “primary ISP” is “urged” to consider whether ITMPs will have a disproportionate impact on secondary ISPs.<sup>23</sup> If it is satisfied there will not be such an impact, it may proceed without Commission approval or it may seek prior Commission approval.<sup>24</sup> Regardless, “any affected party... can raise a complaint with the Commission.”<sup>25</sup>
31. TekSavvy therefore requests that the Commission accept this Intervention as a complaint against the ITMP in Rogers TN 67 and 67A and, pursuant to paragraph 86 of the ITMP framework, TekSavvy asks that the Commission order Rogers to immediately stop applying the ITMP to its wholesale services pending a final Commission determination on the matter.<sup>26</sup>

**D. Rogers did not provide required notice of the ITMP to its wholesale customers**

32. For technical ITMPs applied to wholesale services that do not require prior Commission approval, the Commission stated in the ITMP framework that a description of the ITMPs in the ISP’s tariff is the best means of providing information to secondary ISPs. Accordingly, primary ISPs are required to issue updated tariff pages a minimum of 60 days prior to implementing the ITMP.<sup>27</sup>
33. The relevant proposed tariff page in TN 67 has a proposed effective date that is the same day on which the Tariff Application was filed: 6 May 2020. In other words, Rogers gave secondary ISPs zero days’ notice.
34. The relevant proposed tariff page in TN 67A has a proposed effective date that is the same day on which that updated Tariff Application was filed, 20 May 2020. There is a discrepancy between these tariff pages and the document containing supporting arguments (“Tariff Terms and Conditions”) which both propose that the ITMPs would be effective 20 May 2020, and the cover letter filed with TN 67A which proposed an effective date of 20 June 2020. Since the tariff pages themselves state that they would be effective 20 May 2020, TekSavvy understands that to have been Rogers’ intention. If

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<sup>22</sup> Rogers Network Management Policy, <https://www.rogers.com/cms/pdf/Rogers-Network-Management-Policy-en.pdf>.

<sup>23</sup> ITMP framework, at para 84.

<sup>24</sup> Ibid.

<sup>25</sup> Ibid.

<sup>26</sup> ITMP framework, at para 86.

<sup>27</sup> ITMP framework, at para 91.

so, then Rogers gave zero days' notice for TN 67A. If Rogers intended the effective date to be 20 June 2020 as stated in the cover letter, then Rogers gave 30 days' notice.

35. Regardless, Rogers has not satisfied its obligation to provide 60 days' notice.
  36. In addition, as explained above, Rogers began applying ITMPs on 14 May 2020 also without giving TekSavvy notice. Instead, Rogers told TekSavvy by phone on the same day that the ITMPs were being implemented. The ITMPs applied by Rogers from 14 April to 6 May differs from that described in the Tariff Notices, as described above.
- E. The Tariff Notices fail to meet the ITMP framework's disclosure requirements and bar secondary ISPs from meeting their own disclosure obligations**
37. In the case of all technical ITMPs regardless of type or any requirement for Commission approval, the wholesale services tariffs of primary ISPs should, at a minimum, include why ITMPs are being introduced, who is affected by the ITMP, when the Internet traffic management will occur, what type of Internet traffic is subject to management, and how the ITMP will affect a user's Internet experience, including the specific impact on speeds<sup>28</sup>.
  38. Secondary ISPs are also subject to the same disclosure requirements and, within 30 days of a primary ISP issuing revised tariff pages, or in cases where prior approval of the ITMP is required, 30 days of the Commission granting its approval, the secondary ISP must provide its retail customers with information regarding why ITMPs are being introduced, who is affected by the ITMP, when the Internet traffic management will occur, what type of Internet traffic is subject to management, and how the ITMP will affect a user's Internet experience, including the specific impact on speeds.<sup>29</sup>
  39. Following TN 67, The Internet Society Canada Chapter ("ISCC") submitted to the CRTC on 12 May 2020, a Procedural Request asking that "*Rogers be directed to amend the proposed tariff pages with a complete description of the ITMP being employed, including how the ITMP will affect a user's Internet experience, including the specific impact on speeds*".
  40. Marc Nanni submitted a similar Procedural Request to the CRTC on 13 May 2020 in response to TN 67 requesting "proper disclosures and proper transparency" suggesting that Rogers did not provide those in TN 67.
  41. Apparently in response to these procedural requests concerning the lack of information contained in Rogers proposed tariff pages, Rogers filed TN 67A with only minimal updates to the proposed tariff pages: the inclusion of the term "temporarily" as referenced above, and the correction of a paragraph numbering error. In their supporting material, Rogers referred to a URL that, as accessed on 3 June 2020, describes an ITMP. That letter and that URL, however, would not form part of the tariff, and as such they are insufficient to meet the requirement in the ITMP framework that "the wholesale

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<sup>28</sup> ITMP framework, at para 94, incorporating by reference the obligations in para 60 to disclose details of ITMPs to retail customers.

<sup>29</sup> ITMP framework, at paras 63-64.

service tariffs of primary ISPs should, at a minimum, include the information” describing the ITMPs.

42. The information currently provided in section 1.3.1 of the proposed tariff page 72 itself is utterly insufficient for the purposes of disclosure of ITMPs to secondary ISPs as it is virtually devoid of any detail about the ITMPs. The proposed page does not explain why the ITMPs are being introduced, who is affected, when the traffic management would occur, what type of traffic is subject to management, or how the ITMP will affect a user’s Internet experience including the specific impact on speeds.
43. Though TekSavvy acknowledges and appreciates the additional context provided by Rogers to its retail end-users through its Network Management Policy and reference to that context in supporting material for the Tariff Notices, Rogers’ Network Management Policy as described in a PDF file on its website may change at any time, with or without notice. That is in large part why the Commission concluded that “a description of the ITMPs in the tariffs of primary ISPs is the best means of providing information to secondary ISPs.”<sup>30</sup>

## **F. Conclusion**

44. TekSavvy suspects that Rogers implemented ITMPs at the network level without considering the impact on its wholesale customers or the regulatory obligations to consider any possible disproportionate impacts of those ITMPs on wholesale customers, to describe the ITMPs in detail as outlined in the ITMP framework, and to provide notice. It seems likely that, faced with the challenges that covid19 presented to their network, Rogers implemented ITMPs network-wide and only later scrambled to meet its regulatory obligations for wholesale customers.
45. TekSavvy notes that the ITMP framework is a well-established and stable framework that has been in place for over a decade. All parties should be very familiar with it and should have built compliance with the ITMP framework into internal processes.
46. TekSavvy also notes that incumbents have a natural incentive not to take the additional measures required to comply with the ITMP framework with respect to wholesale customers and wholesale end-users. If there are no consequences for an incumbent’s failure to comply with wholesale obligations, then incumbent carriers would have no incentive to bother building compliance into internal processes.
47. As such, TekSavvy makes the following requests:
  - In light of the significantly disproportionate impact of Rogers’ currently imposed ITMPs and proposed ITMPs on wholesale-based providers, TekSavvy makes this complaint to the Commission and asks that the Commission order Rogers to immediately cease applying the ITMP to its wholesale services pending a final Commission determination on the matter.

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<sup>30</sup> ITMP framework, at para 91.

- TekSavvy requests that the Commission enforce the disclosure and notice requirements of the ITMP framework for this and any future related tariff notices concerning Rogers ITMPs.
  - TekSavvy encourages the Commission to consider any other available remedies that may be appropriate in order to ensure that Rogers is incentivized to consider its wholesale obligations as part of its network planning.
48. Finally, TekSavvy notes that Rogers' unilateral approach to network traffic management runs contrary not only to the requirements of the ITMP framework to provide notice and transparency about ITMPs, but also to the CRTC's recent direction promoting collaboration between wholesale service providers and their customers at this time<sup>31</sup>. While we have significant concerns about the prospect of limiting our end-users' usage—especially when we purchase enough capacity from Rogers to carry that usage—if Rogers' network is experiencing burdens that Rogers is not able to remedy through investment, TekSavvy remains open to working with Rogers to identify areas where we might be able to help. Simply put, TekSavvy would strongly prefer to work collaboratively to find ways to manage usage that would allow us to make our own decisions and control our own network and end-user services, rather than having a heavy-handed approach imposed by the underlying carrier.

Yours truly,

*[transmitted electronically]*

Andy Kaplan-Myrth  
VP, Regulatory and Carrier Affairs

cc: Kyle Mitchell kmitchell@teksavvy.ca

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<sup>31</sup> CRTC, *Telecom Commission Letter addressed to Various Parties RE: High speed access process changes as a result of the COVID-19 pandemic*, 22 April 2020, <https://crtc.gc.ca/eng/archive/2020/lt200422.htm>.