



October 15, 2018

Mr. Claude Doucet
Secretary General
Canadian Radio-Television and
Telecommunications Commission
Ottawa, Ontario
K1A 0N2

**Re: Part 1 application by TNW Wireless Inc. relating to wholesale roaming agreements
required under Telecom Regulatory Policy 2015-177**
File: 8620-R63-201705675

Dear Mr. Doucet:

1. Shaw Communications Inc. (**Shaw**) is in receipt of final comments filed October 9, 2018 by TNW Wireless Inc. (**TNW Wireless**) in the above referenced proceeding. As described below, TNW Wireless' comments include statements regarding Freedom Mobile Inc.'s (**Freedom**) wireless services that are inaccurate and misleading. Therefore, Shaw respectfully request the Commission strike paragraphs 24 and 43 from TNW Wireless' comments and give no weight to the arguments contained therein.
2. In paragraph 43, TNW Wireless states that Freedom "uses Wi-Fi including public Wi-Fi to provide GSM-based services to its clients while their clients are outside its licensed spectrum footprint and supplements this through roaming agreements with roaming partners". TNW goes on to argue that "there is nothing precluding a subscriber residing in the "away network" from purchasing a Shaw/Freedom Mobile service and being in a true "permanently roaming" situation". These statements are untrue and, in combination with TNW Wireless' statement in paragraph 24, could lead the parties to believe that Freedom directly markets to and/or provisions customers residing outside of Freedom's licensed spectrum footprint using a combination of permanent roaming and WiFi networks.¹
3. Freedom's customers do have the added advantage of access to the extensive Shaw Go WiFi network. However, contrary to TNW Wireless claims, Freedom does not rely on this WiFi network to provide its customers with access to mobile wireless services outside its licensed

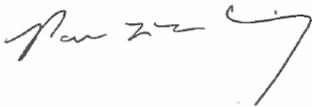
¹ In paragraph 24 of the TNW comments, they state that Freedom "market[s] nationally within their "home network"". This statement implies that Freedom is knowingly marketing to provide services to customers residing outside of its licensed spectrum footprint. Freedom does not in fact market its services with the intent of providing services to customers outside of its licensed footprint.

spectrum footprint. When a Freedom customer is temporarily outside of Freedom's licensed spectrum footprint all GSM services are provided via our roaming partner's network. Freedom customers may log into any WiFi network on their phone to gain access to a public Internet connection but there is no correlation between the Shaw Go WiFi network (or another WiFi connection) and Freedom's cellular mobile network.

4. Freedom operates within the existing regulatory framework complying with both the terms of our wholesale roaming agreements and the Commission's determinations set out in Telecom Decision CRTC 2017-56 which prohibit the use of mandated wholesale roaming on a permanent basis. In accordance with Telecom Decision CRTC 2018-97, Freedom does not rely on a WiFi network to provision customers outside of its licensed spectrum footprint. Any statements to the opposite are inaccurate and misleading. They must therefore be stricken from the record of this proceeding and given no weight by the Commission.
5. If you have any questions or concerns regarding this filing please contact Esther Snow, Director, Regulatory Affairs, at (250) 417-3885 or Regulatory@sjrb.ca.

Yours truly,

Shaw Communications Inc.



Paul Cowling
Vice President,
Legal & Regulatory Affairs

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