

Telecom Procedural Letter Addressed to Mr. Lawry Trevor- Deutsch (TNW Wireless Inc.)

Ottawa, 13 July 2018

Our reference: 8620-R63-201705675

BY EMAIL

Mr. Lawry Trevor-Deutsch
President
TNW Wireless Inc.
468 Pleasant Park Road
Ottawa, ON K1H 5N1
regulatory@tnwcorp.com

Re:Part 1 application by TNW Wireless Inc. relating to wholesale roaming agreements required under Telecom Regulatory Policy 2015-177) ¹ – Requests for information

Dear Mr. Trevor-Deutsch:

Attached are requests for information to TNW Wireless Inc. (TNW Wireless) associated with the above-noted proceeding. Responses to these requests for information are to be filed with the Commission, and served on all parties to this proceeding, by **27 July 2018**, in accordance with the *Canadian Radio-television and Telecommunications Commission Rules of Practice and Procedure*.

Parties may file supplementary comments on the responses, serving a copy on all parties, by **10 August 2018**. TNW Wireless may file supplementary reply comments, serving a copy on all parties, by **17 August 2018**.

Documents to be filed or served by a specific date must be actually received, not merely sent, by that date.

Sincerely,

Original signed by C. Brock for/

John Macri
Director, Policy Framework
Telecommunications Sector

c.c.: Julie Boisvert, CRTC, (819) 953-2421, julie.boisvert@crtc.gc.ca

Christine Brock, CRTC, (819) 997-4557, christine.brock@crtc.gc.ca

Chris Copeland, regulatory@tacitlaw.com

Bell Mobility Inc., bell.regulatory@bell.ca

Rogers Communications Canada Inc., rwi_gr@rci.rogers.com

TELUS Communications Company, regulatory.affairs@telus.com

Ice Wireless Inc., regulatory@icewireless.ca

Shaw Communications Inc., Regulatory@sjrb.ca

Eastlink, regulatory.matters@corp.eastlink.ca

Québecor Média inc. dennis.beland@quebecor.com

Public Interest Advocacy Centre (PIAC), jlawford@piac.ca

Attachment (1)

Requests for information addressed to TNW Wireless

1. Provide an organizational chart, and supporting documents, which reflects the current corporate structure of TNW Wireless Inc., including:

- a. the corporations or legal entities which form part of the control chain and all corporations or legal entities holding directly or indirectly voting interest; and
 - b. affiliates (including) subsidiaries of TNW Wireless Inc.
2. Indicate who is the natural person(s) and/or the legal person(s) who controls (as that term is defined in the *Telecommunications Act*) TNW Wireless Inc. and by what means.
3. Provide a description of TNW Wireless Inc.'s ownership history.
4. Provide a description of the relationship (recent past and/or present) between TNW Wireless Inc. (or any of the corporations/persons in its corporate structure), and the entities listed below (unless the relationship is established in the previous question):
 - o TNW Networks Corp
 - o Investel Capital Corp.
 - o United American Corp.
 - o 8640025 Canada Inc.
 - o Navigata Communications Ltd.
 - o Telephone Data Centers Inc.
 - o Telephone Canada Corp.
 - o Telephone Navigata-Westel Communications
 - o Fiducie Residence JAAM
 - o Information Technology and Telecommunications Canada
 - o Distributel Communications Limited
 - o Navigata Communications, 2009 Inc.
5. At paragraph 10 of its Part 1 Application filed 3 July 2017 (the Application), TNW Wireless stated the following:

On May 11, 2017 Bell responded to the TNW proposal by refusing TNW's request citing amongst other things, that TNW did not provide any details on how it intended to ensure that its customers only used Bell services on an incidental basis and not a permanent basis. The response also requested answers to approximately 30 questions and noted that upon receipt of these answers, Bell "will consider such

information and provide a further reply". On June 14, 2017 TNW provided detailed responses to all Bell's questions including technical specifications and complete support for TNW compliance with the incidental roaming provisions of CRTC 2017-56.

Also, at paragraph 13, TNW Wireless stated the following:

On January 30, 2017 Telus responded to the TNW letter with a request to provide answers to a questionnaire of some 25 items covering technical aspects, managerial structure, ownership structure, and customer profile. On February 1, 2017 TNW provided Telus with detailed responses to all its questions.

Provide a copy of 1) Bell's questions, 2) TELUS' questionnaire, and 3) TNW Wireless' responses.

6. At paragraph 42 of its 14 May 2018 final reply, TNW Wireless stated that while the deemed transfer process from RuralCom Corporation is not completed, it has been in regular contact with Innovation, Science and Economic Development (ISED) and has been told that the deemed transfer is "in the queue".
 - a. Explain what this "deemed transfer" refers to, and confirm whether the transfer process is now completed.
 - b. If the transfer is completed, provide supporting documentation.
 - c. If the transfer is not completed, provide any documents that can support the statement (e.g. copies of emails) that the transfer has been requested and is "in the queue". Also, indicate if there is a formal or informal timeline for the processing of the transfer and, if any, provide details of or a copy of that timeline.
7. In its 14 May 2018 final reply, TNW Wireless stated that it holds two spectrum licences as identified in its Application. In addition, TNW Wireless stated that it received spectrum licence renewals from ISED and paid them in full on March 30, 2018.
 - a. Specify which spectrum licences TNW Wireless holds.

- b. Provide supporting documentation that the spectrum licenses mentioned in a) are held by TNW Wireless.
 - c. Provide supporting documentation that the renewed spectrum licenses identified in a) were provided by ISED.
 - d. Confirm whether the spectrum licences currently held by TNW Wireless are currently being used by TNW to provide telecommunications services to the public for compensation.
8. In the Application, TNW Wireless stated that it operates its own tower/radio sites and its own core mobile network which provide service to its home public mobile network. Provide the following information:
 - a. Identify any cellular towers and/or sites that are *owned* by TNW wireless.
 - b. Identify any cellular towers and/or sites that are *operated* by TNW wireless.
 - c. Identify which of these cellular towers and/or sites are operational and currently being used to provide telecommunications services to the public for compensation.
 - d. Identify any cellular towers and/or sites that are not owned or operated by TNW but are used by TNW Wireless to provide telecommunications services to the public for compensation.
9. Provide the number of TNW Wireless customers that have subscribed to mobile telephone services provided by TNW Wireless in its home public mobile network as of 30 June 2018.
10. Confirm that the spectrum licences, issued by ISED, authorize TNW Wireless to use the spectrum to provide voice and data telecommunications services. In addition, provide documentation to support TNW Wireless' statement that it is respecting ISED's Conditions of licence (COL) for this spectrum.
11. In its 14 August 2017 reply, TNW Wireless stated it is a legal licensee of the iPCS technology. Provide any supporting documentation for this statement.

12. Provide details of how the Wi-Node interfaces with TNW Wireless Radio Access Network (RAN). Specifically, identify the number of Wi-Nodes in your network, their locations, the frequencies used as well as their capacity (number of simultaneous calls supported per Wi-Node).
13. Explain the relationship of Cloud Spectrum to Wi-Node Gateways and the relationship of Cloud Spectrum to the company's radio base stations (e.g. Base Transceiver Station (BTS)/eNodeB). Provide a detailed diagram showing all interfaces.
14. At paragraph 20 of its 14 May 2018 reply, TNW Wireless stated that iPCS users while on Wi-Fi receive their GSM-based services from TNW Wireless' network and licensed spectrum only. At paragraph 56 of the Application, the company stated that "Users' smartphones connect on a private network over Internet Protocol (IP) similar to cellular protocol such that the Home NodeB IuH interfaces (3G networks) or S1 interfaces over IP (4G/LTE networks) for connection to a BTS."
 - a. Explain the rationale for connecting to your core network via BTS and licensed spectrum rather than via direct IP connectivity to your core.
 - b. Provide details on the benefits of this approach. For example, are there services that can only be provided using the company's approach?
 - c. Explain in detail how the traffic from remote customers is retransmitted over TNW Wireless' RAN. How does this affect the capacity on the company's RAN when multiple remote users are connected?
 - d. Explain whether remote customers connect to the same cellular network used by TNW Wireless cellular subscribers in TNW Wireless Home Network footprint or whether they are connected at specific towers.
15. At paragraph 79 of the Application, TNW Wireless describes how iPCS supports 911/E911 when subscribers are on the TNW Wireless

network and also when they are on a roaming partner's network. Explain in detail how a 911 call is processed when the iPCS user is using Wi-Fi and their phone is unregistered from any cellular network.

Footnotes

- 1 *Regulatory framework for wholesale mobile wireless services*,
Telecom Regulatory Policy CRTC 2015-177, 5 May 2015,
<https://crtc.gc.ca/eng/archive/2015/2015-177.htm>
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Date modified:

2018-07-13