

## **ATTACHMENT 3 – CRTC REGISTRATION AND KNOWN REGULATORY REQUIREMENTS**

---

The City would be obligated to register as a federally regulated telecommunication carrier with the CRTC (Canadian Radio-television and Telecommunications Commission) should it wish to lease any component or part of its municipal fibre network infrastructure to third parties for compensation. A municipal fibre network that is used solely for internal, corporate network services is not obligated to register as a federally regulated telecommunications carrier. A third party is defined as any entity that is not part of or owned by the City, or where the City is not the sole shareholder; additionally, any entity that pays a fee for such access is considered a third party.

Regulated carriers have unique annual financial reporting and auditing obligations to the federal government that include: annual audited financial statements; Basic International Telecommunications Service (BITS) licensing, which is required of owners of networks capable of carrying international communications; and accessibility compliance auditing under the provisions of the Accessible Canada Act (ACA).

ACA compliance would require careful examination as the current standards apply to the entirety of a regulated telecommunications service provider's operations. In the case of municipal carriers, this scope may capture City operations that are not directly connected to telecommunications (e.g., water, parks).

Additionally, as a regulated telecommunications service provider, the City would need to obtain specialized telecommunications legal support to advise on risk mitigation strategies and to address any legal disputes that may emerge between the City and other regulated carriers.