

2013 05 15

To: Mr. John Traversy
Secretary General
Canadian Radio-television and
Telecommunications Commission
Ottawa, Ontario
K1A 0N2

Subject: **Telecom Notice of Consultation CRTC 2013-80, Review of outstanding wholesale high-speed access service issues related to optional upstream speed rates and modem certification requirements – Comments**

Dear Mr. Traversy,

1. Bell Aliant Regional Communications, Limited Partnership and Bell Canada (collectively, the Companies) are in receipt of responses to the requests for information from the Canadian Network Operators Consortium Inc. (CNOC), MTS Inc. and Allstream Inc. (collectively MTS Allstream), Saskatchewan Telecommunications (SaskTel) and Telus Communications Company (Telus) dated 8 May 2013. In accordance with the procedure established in a Commission staff letter dated 29 April 2013, the Companies file the following comments in relation to the responses that specifically pertain to modems.

A. A price comparison with other VDSL2 modems on the market is not sound and, in any case, irrelevant

2. CNOC was asked¹ to identify three VDSL2 modems that compare functionally to the modem sourced by the Companies, the Sagemcom 2864. CNOC was also asked to provide the estimated wholesale price of each alternative and to indicate whether the price includes taxes and other costs.

3. CNOC provided little information on the public record and, as a result, the Companies do not know whether CNOC listed modems that are comparable to the Sagemcom 2864. However, since CNOC highlights that some retail users do not use the wireless and routing functionalities that the Sagemcom 2864 modem provides, the Companies anticipate that CNOC's listed modems may not include these functionalities. If that is the case, then little can be derived from a comparison of the prices of the modems submitted by CNOC with that of the Sagemcom 2864.²

¹ See CNOC(CRTC)29Apr13-1.

² Provided by the Companies in their response to The Companies(CRTC)29Apr13-4 TNC 2013-80.

4. The Companies further note that CNOC's response does not appear to indicate whether the price of the modem in the table includes taxes and other costs as was requested in the Commission's question (though these elements were included in the information the Companies provided on the Sagemcom 2864 modem).

5. In any event, the Sagemcom 2864 modem which is the same modem provided to both retail and wholesale end-users provides equal value to the end-users that make use of the wireless and routing functionalities. As such, there is no undue preference between the Companies' retail high-speed offer and what is made available to the ISP on a wholesale basis.

6. Finally, if ISPs believe that cheaper modems with less functionality would be desirable for their customers, ISPs always have the option to work directly with Sagemcom to purchase modems with fewer functionalities. Alternately, ISPs can also source other modems from other manufacturers, so long as these are CS-03 certified. As described in their Comments, the Companies are willing to test these modems provided that: i) the candidate modem is already CS-03 certified; ii) the candidate modem is proposed by an ISP, the actual wholesale customer; iii) the candidate modem is reasonably expected to be compatible with the Companies' network; iv) testing is limited to verifying compatibility of the VDSL2 modem with the Companies' network; and that v) the Companies be able to recover their full costs.

B. Technician visits can be avoided in the majority of cases

7. CNOC was asked³ to provide its views on whether Bell's problem resolution protocol allows for the isolation of known modem-related support issues in order to limit unnecessary technician dispatches. In its response, CNOC states that the only protocol it is aware of is described in the Companies' "Wholesale GAS & HSA Service Standards" document. CNOC indicates, however, that this process does not specifically isolate known modem-related support issues in order to limit unnecessary technician dispatches.

8. CNOC also provides an example to support its claim. CNOC indicates that in a case where an incompatible modem is attached to the network and a result of 6 dB noise margin is observed in conjunction with the Alcatel Lucent Stinger Digital Subscriber Line Access Multiplexer (DSLAM), this is often evidence of a compatibility problem due to the narrow modem type support offered by this DSLAM. CNOC indicates that the same 6 dB noise margin could be a sign of noise on the line or some other type of problem when in conjunction with another type of DSLAM.

9. The Companies' problem resolution process is a three phase approach. First, the ISP must perform some basic troubleshooting with its customer before opening a trouble ticket. To perform this, the Companies make online web-based tools available to the ISPs that enable them to determine the line statistics in real time, including the synchronization bit rate of the line and noise margin level. At this stage, if the ISP observes a noise margin of 6 dB, this does not indicate that there is an issue with the line whether the end-user is connected to the Alcatel Lucent Stinger DSLAM or any other type of DSLAM. A 6 dB noise margin on the line may be acceptable (it usually is) and therefore, the example provided by CNOC in this regard is unclear.

10. In the second stage of the problem resolution process, if problems for the end-user persist and web-based tools do not reveal anything, the ISP can open a trouble ticket with the Companies. Based on the nature of the problem described by the ISP in the trouble ticket, the Companies will communicate directly with the end-user and perform various troubleshooting

³ See CNOC(CRTC)29Apr13-2.

tests to determine the source of the problem. The tests include remotely testing the line up to and including the end-user's modem.

11. In the third phase of the problem resolution process, if the remote line testing did not clearly identify the problem, a technician can be dispatched to the end-user's premises. If a problem is identified beyond the network interface device (NID) on the customer's side, then diagnostic maintenance charges would apply to the ISP. If a problem is identified on the network side of the NID, then there are no charges for the technician dispatch.

12. The Companies note that they would have proceeded in the same manner if a trouble had been identified by a retail end-user. The line would have been remotely tested and if it was not possible to determine the source of the problem, then a technician would be dispatched.

13. The Commission's question is whether, under the current problem resolution process, ISPs have to pay for unnecessary technician dispatches. The Companies note that the problem resolution process minimizes the number of technician dispatches and is consistent with the approach taken for retail end-users. The example used by CNOC of an incompatible modem connected to the network with an observed noise margin of 6 dB does not support its claim that modem-related issues cannot be isolated or that there are unnecessary technician dispatches.

C. Requirement of CS-03 certification for terminal devices attached to ILEC networks

14. MTS Allstream and Telus were asked⁴ whether they require modems on their network to be CS-03 certified. In response, Telus noted that it expects ISPs and their manufacturers to adhere to CS-03 specifications while MTS Allstream answered that it requires modems to conform to CS-03 specification, as indicated in its tariff.

15. The Companies note that they, and SaskTel, have previously indicated that CS-03 certification is required for modems under their respective tariffs. Therefore, all five ILECs in this proceeding have confirmed that CS-03 certification is required for modems attached to their network.

16. CS-03 certification for modems attached to ILEC networks is important as it ensures that these terminal devices respect certain electrical parameters in order to avoid damaging the network. Compatibility is of particular importance in the case of high-speed access services provided using Digital Subscriber Line (DSL) technology because multiple DSL circuits cohabitating the same cable can produce negative impacts on one another.

17. CNOC indicated in its final reply comments⁵ that in the event that such a certification process is required, it does not object to the CS-03 certification requirement, provided that the Companies also adhere to it for all of their retail modems. In that regard, the Companies note that they already indicated in their comments⁶ that modems they purchase must be CS-03 certified as required in all their modem purchase contracts.

18. Since there was no evidence submitted in this proceeding to support removing the requirement for modems to be CS-03 certified, the Companies submit that the CS-03 certification requirement of all modems should continue.

⁴ See MTS Allstream(CRTC)29Apr13-1 TNC 2013-80 and TELUS(CRTC)29Apr13-1.

⁵ Reply comments of CNOC, 11 April 2013, paragraph 41.

⁶ Comments of the Companies, 27 March 2013, paragraph 6.

D. Compatibility issues are limited to the Alcatel Lucent Stinger DSLAMs

19. SaskTel was asked⁷ to identify which type of VDSL2-capable DSLAM is currently known to have compatibility issues with off-the-shelf VDSL2 modems. In its response, SaskTel noted that the Alcatel Lucent 7330s provisioned with VDSL EVLT-F cards are known to have compatibility issues.

20. The Companies note that they do not purchase VDSL EVLT-F cards for their 7330 DSLAMs. As indicated previously, the compatibility on the Companies' network is limited to the Alcatel Lucent Stinger DSLAMs.

21. Please direct all inquiries or correspondence regarding this application to Philippe Gauvin at (613) 785-6286 or e-mail to bell.regulatory@bell.ca.

Yours truly,

[Original signed by D. Henry]

[Original signed by P. Gauvin]

Denis E. Henry

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⁷ See SASKTEL(CRTC)29APR13-2 NC 2013-80, part b.