Teresa Griffin-Muir
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MTS Allstream

15 May 2013   **by GCKey**

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

Dear Mr. Traversy:

Subject: TNC 2013-80, ***Review of outstanding wholesale high-speed access service issues related to interface rates, optional upstream speed rates, and modem certification requirements*** **– MTS Allstream comments on interrogatory responses**

1.   Pursuant to the procedures set out in the Commission staff letter dated 29 April 2013 with regards to Telecom Notice of Consultation CRTC 2013-80, *Review of outstanding wholesale high-speed access service issues related to interface rates, optional upstream speed rates, and modem certification requirements*, 21 February 2013 (TNC 2013-80), MTS Inc. and Allstream Inc. (collectively, MTS Allstream) are hereby filing comments on the issues raised in the requests for information in the staff letter.

2.   At the outset, MTS Allstream notes that Bell Aliant Regional Communications (Bell Aliant) and Bell Canada (collectively, Bell) have once again failed to meet the deadline for filing their interrogatory responses. In its 8 May 2013 covering letter, Bell states:

> The Companies regret to inform the Commission that they are unable to provide their responses on questions related to optional upstream speeds for Bell Canada and Bell Aliant in Ontario and Québec. However, the Companies expect to be able to file these responses shortly.

MTS Allstream has not yet received Bell's responses to these interrogatories, nor do they appear to be posted on the Commission's website.

3.   In their letter, Commission staff asked incumbent local exchange carriers (ILECs) for information regarding compatibility issues between VDSL2 modems used by independent internet service providers (ISPs) and the VDSL2-capable DSLAMS used to provide the ILECs' wholesale high-speed internet (HSI) services.

4.   In this regard, MTS Allstream notes that it has not experienced any compatibility issues with the VDSL2-capable DSLAMs it deploys in its network and the modems supplied by ISPs using its VDSL Data Access Service (VDAS).[1] MTS Allstream is aware of multiple modem models that work with the VDSL2 DSLAM cards that it uses. As indicated in its response to MTS Allstream(CRTC)29Apr13-2 TNC 2013-80, unlike other ILECs, MTS Allstream does not supply modems for either of its wholesale HSI services – VDAS or its legacy ADSL Data Access Service (ADAS).[2]

5.   MTS Allstream does not use the Alcatel Lucent Stinger DSLAM that has been identified by both Bell and the Canadian Network Operators Consortium (CNOC) as having compatibility issues.

6.   MTS Allstream has not yet used Bell's fibre to the node (FTTN) Gateway Access Service (GAS-FTTN), so has no first-hand experience with the issues related to modem incompatibility problems identified by CNOC. However, based on the responses provided by both Bell and CNOC, Bell should be required to provide reasonable alternative(s) to address this incompatibility issue. ISPs must be able to use the modem of their choice when there is no DSLAM restriction. Bell's response to The Companies(CRTC)29Apr13-7 TNC 2013-80 indicates it does not prohibit the use of alternative modems. However, with the known compatibility issues of the Stinger DSLAM, the choice may be practically restricted to modems with the same chip, which come at higher market price. Since only Bell has the information on where it has different types of DSLAM equipment deployed in its network, Bell should be required to identify the wire centres and exchanges where it uses the Stinger DSLAM, so ISPs can

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[1]   Special Services and Facilities Tariff (SST), CRTC 24002, Item 5830.
[2]   SST Item 5820.

make their own choice of modem outside those areas. These locations should be increasing, as Bell phases out the Stinger DSLAM over time.

Yours truly,

for Teresa Griffin-Muir
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