



August 28, 2015

Our reference: 701360

BY EMAIL

Mr. Philippe Gauvin
Senior Legal Counsel
Bell Canada
Floor 19
160 Elgin Street
Ottawa, Ontario K2P 2C4



RE: Further requests regarding CRTC Case ID 701360

Dear Sir:

By letter, dated 10 July 2015, Commission staff requested that Bell Canada respond to complaints by Mr. Ryan Adams, dated 18 May 2015 and 11 June 2015.

On 10 August 2015, Bell Canada provided its response, with a copy to Mr. Adams.

By email, dated 11 August 2015, Mr. Adams indicated that he was dissatisfied with Bell Canada's response and listed several issues he considered Bell Canada had not addressed. Mr. Adams also asked whether he could provide more evidence for his complaints.

Staff notes that consumers may at any time provide comments or complaints to the Commission on the services provided by a telecommunications service provider (TSP). Staff may:

- decide that the telephone company's response is satisfactory, with no further action; or
- ask for more information from the complainant or the telephone company to determine what, if any, further action is needed; or
- pursue further investigation.

In his follow-up email, Mr. Adams referenced various details including rates and maps in support of his concerns. For efficiency, Commission staff has summarized the following issues from Mr. Adams' follow-up email message and provides its views regarding each of those issues.

- i. *Lack of disclosure of rates and adherence to service comparability requirements.* Mr. Adams details his concerns about specific rate items and notes that Fixed Wireless service is not available in all communities. He questions the difference in the rates Bell Canada is charging versus the rates detailed in Telecom Decision 2010-805.¹

- ii. *Lack of publicly available information that would allow the complainant to determine what addresses are within a Distribution Serving Area (DSA) where broadband service has been rolled out using deferral account funds.*

Mr. Adams claims that certain addresses that should be served are not being served, but Bell Canada is the only party that can confirm whether these addresses are within the DSA. Mr. Adams proposes that Bell Canada be required to confirm whether a group of 50 specific addresses are served.

In its response, Bell Canada indicated that it has communicated with potential broadband customers in deferral-account-funded DSAs through direct mail campaigns and a door-to-door program. As the service provider, it is up to Bell Canada to determine on a case-by-case basis whether it can serve individual customers when service is requested. Therefore, it would not be appropriate to require Bell Canada to verify whether it serves a list of addresses provided by Mr. Adams, an independent party.

However, Bell Canada also indicated it had filed maps of the DSAs it proposed to serve in the deferral account proceedings. DSAs are generally bounded by major roads which are easily discernible in the maps and can be used to determine whether an address falls within the DSA. DSA maps may therefore be useful in responding to Mr. Adams' concerns in distinguishing between addresses that may be served through the deferral account.

- iii. *Lack of clarity about where broadband service is available in Denbigh, Ontario.*

Mr. Adams indicates that there was a change in the broadband service availability maps for Denbigh between 4 April 2015 and 10 August 2015 and is concerned that deferral-account-funded broadband rollout was completed in August 2015 rather than August 2014 as Bell Canada had reported.

Outstanding Issues

With regards to these issues, Paragraph 28(1)(a) of the *Canadian Radio-television and Telecommunications Commission Rules of Practice and Procedure* provides that the Commission may request parties to file information or documents where needed.

Bell Canada is requested to provide comprehensive answers, including rationale and any supporting information, to the attached questions by **18 September 2015**, with a copy to Mr. Adams.

¹ Bell Canada – Applications to review and vary certain determinations in Telecom Decision 2010-637 concerning the use of high-speed packet access wireless technology and the deferral account balance, Telecom Decision 2010-805, 29 October 2010.

Commission staff will review the company's response to determine whether further action is required.

Sincerely,

Original signed by Robert Martin for

Michel Murray
Director, Dispute Resolution and Regulatory Implementation
Telecommunications sector

c.c.: Mr. Ryan Adams, [REDACTED]
Joseph Cabrera, CRTC, [REDACTED]

Attach.

Request for information – CRTC Case ID 701360

1. In its 10 March 2006 letter, the Commission set out the requirement that the broadband services should be comparable to those provided in urban areas. Further, in the proceeding that led to Telecom Decision 2010-805, the company proposed to provide broadband service that was comparable with urban broadband service. The company also committed to maintain comparability as urban broadband service improves.
 - a. Explain whether the company has provided broadband service in approved communities that is comparable with urban broadband service, using examples of the broadband services and rates offered in approved DSAs, both DSL-based and wireless-based, compared to the broadband services and rates offered in urban areas.
 - b. If the company has not provided comparable broadband service in all approved communities, explain why not, with rationale.
 - c. Explain how the company proposes to adhere to its commitment, referenced in Decision 2010-805 paragraph 20, to maintain comparability as urban broadband service improves, providing examples where possible.
2. In its response to Commission staff's 10 July 2015 request that Bell Canada respond to complaints by Mr. Ryan Adams, Bell Canada indicated that, as facilities and network connections were completed in approved DSAs, it had undertaken a comprehensive direct mail campaign to inform potential broadband subscribers that service was available. It also indicated that it had implemented a second direct mail campaign for all of the approved communities where broadband services were deployed using wireless technology. The company further indicated that it had begun a door-to-door contact program recently and that, where there was no response, representatives had left a doorknob hanger with information about the broadband offer.
 - a. Provide examples of the communications materials that were mailed to potential subscribers in deferral account DSAs.
 - b. Provide examples of the doorknob hanger used in the door-to-door contact program.
3. Provide maps showing the approved DSAs in Apsley, Bury, Denbigh, Gogama, Pembroke, and Pass Lake, specifying the technology used to provide broadband service and the in-service dates for those areas. Also indicate DSA 182-1 on the relevant map.
4. Refer to the map showing the approved Denbigh DSA provided in response to Question 3. Indicate whether the approved Denbigh DSA is within the same area where broadband service is available as shown on the map titled "Denbigh Mobile Coverage Map – 10 Aug 15," referenced in Mr. Adam's 11 August 2015 email message. If it is, explain why the map was only changed in 2015 to indicate service availability in the approved Denbigh DSA as opposed to 2014, when Bell Canada indicated it had completed its broadband service rollout.