



Telecom Order CRTC 2007-24

Ottawa, 25 January 2007

Saskatchewan Telecommunications

Reference: Tariff Notice 102

Aggregated Asymmetric Digital Subscriber Line (ADSL) Service

In this Order, the Commission renders its determinations on a final basis with respect to Saskatchewan Telecommunications' (SaskTel) competitor Aggregated Asymmetric Digital Subscriber Line (ADSL) Service tariff application. The Commission also confirms the final classification of SaskTel's competitor Aggregated ADSL Service as a Category II competitor service. The Commission notes that, in finalizing the tariffs under review in this Order, it considered the importance of providing comparable competitor ADSL access services across the incumbent local exchange carriers' operating regions.

Introduction

1. The rates, terms, and conditions of the proposed tariffs of the major incumbent local exchange carriers (ILECs)¹ asymmetric digital subscriber line (ADSL) services provided to competitors have been the subject of a lengthy industry consultation and negotiation process. As a result of this process, each ILEC, including Saskatchewan Telecommunications (SaskTel), filed tariff applications for its competitor ADSL services. The Commission has approved these applications on an interim basis for all ILECs except Bell Canada, which has received final approval, to allow the services to be introduced on an expedited basis.
2. The Commission has not approved tariffs for SaskTel's Aggregated ADSL Service on a final basis, due in part to results of the industry consultation and negotiation process, which resulted in a number of unresolved issues with respect to the rates, terms, and conditions for these services, as well as disparities between SaskTel's services and other ILECs' competitor ADSL services.
3. This Order disposes of outstanding issues related to the above-referenced tariff application for SaskTel's Aggregated ADSL Service.

Process

The application and interim order

4. The Commission received an application by SaskTel dated 20 January 2006, under Tariff Notice 102 (TN 102), to introduce, as a Category II competitor service, Competitor Access Tariff item 650.32, Aggregated Asymmetric Digital Subscriber Line (ADSL) Service.

¹ In this Order, the term "ILECs" refers to Bell Aliant Regional Communications, Limited Partnership, Bell Canada, MTS Allstream Inc., Saskatchewan Telecommunications, and TELUS Communications Company.

5. SaskTel submitted that its Aggregated ADSL Service was a broadband access service based on ADSL technology. It also submitted that Aggregated ADSL Service enabled a competitive local exchange carrier (CLEC), Internet service provider (ISP), or digital subscriber line service provider (DSLSP) to provide high-speed applications through the establishment of a high-speed data access path between an end-user's premises and a SaskTel designated point of aggregation.
6. The Commission approved the introduction of Aggregated ADSL Service as proposed in TN 102 on an interim basis, with changes, in *Aggregated Asymmetric Digital Subscriber Line (ADSL) Service, and Ethernet Access Services and Agreement*, Telecom Order CRTC 2006-64, 27 March 2006 (Order 2006-64).

Process related to comments and reply comments

7. The Commission received comments regarding TN 102 dated 20 February 2006 from Cybersurf Corp. (Cybersurf), Independent Members of the Canadian Association of Internet Providers (IMCAIP), and Bell Canada; 21 February 2006 from Rogers Telecom Inc. (RTI); and 22 February 2006 from MTS Allstream Inc. (MTS Allstream). SaskTel submitted reply comments dated 7 March 2006.

Positions of parties

8. IMCAIP submitted that SaskTel's Aggregated ADSL Service constituted a bottleneck service and should be priced at Category I competitor service rates. Cybersurf also submitted that SaskTel's service should be priced at Category I competitor service rates.
9. Cybersurf, IMCAIP, RTI, and MTS Allstream expressed concerns regarding the rate levels, mark-ups, and rate structure proposed for the Aggregated ADSL Service. RTI submitted that rates should be comparable across all ILECs, absent significant underlying cost differences. MTS Allstream submitted that SaskTel's pricing prevented competitors from being able to offer a competing service to end-customers in SaskTel's territory.
10. RTI submitted that SaskTel's proposed single access charge placed competitors at a competitive disadvantage when compared to SaskTel's lower-speed retail products, particularly for residential applications. RTI further submitted that SaskTel's proposed competitor ADSL service was not viable for residential applications.
11. Cybersurf submitted that SaskTel was currently using the same ADSL infrastructure extensively to deliver both high-speed Internet services and other services, and that it was not properly allocating the associated Phase II costs. Cybersurf also submitted that SaskTel's cost study did not appear to have applied Phase II costing principles related to the costing of existing shared plant, the application of the concepts of opportunity cost, or, in certain cases, the cost of advancement.
12. IMCAIP and RTI submitted that SaskTel should be directed to allow competitors to use month-to-month pricing at the conclusion of a contract, rather than renewing into a new contract with associated early termination penalties.

13. IMCAIP and Cybersurf submitted that the service charge proposed by SaskTel was much higher than that charged by other ILECs.
14. Cybersurf noted that item 650.32.3.2.3 of SaskTel's proposed tariff would authorize SaskTel to require a competitor to provide a letter of authorization (LOA) executed by the end-user before SaskTel would allow competitor access to the end-user's loop facility. Cybersurf submitted that no other carrier had such a requirement, and that such a requirement would keep Cybersurf out of the market since its customer sign-up process did not usually involve signed documents. Bell Canada submitted that SaskTel should confirm that such an LOA would only be required in circumstances in which a dispute arose between the end-user and a competitor or SaskTel.
15. Cybersurf also noted that SaskTel had proposed to levy a service termination charge equal to the total remaining balance of the recurring monthly rate for the minimum contract period in the event of early termination of the service by the competitor. Cybersurf submitted that such a large termination charge was excessive and in the nature of a penalty. Cybersurf also submitted that consistent with the early termination charges generally applied by other ILECs in such circumstances, SaskTel's early termination charge should be no greater than 50 percent of the total remaining balance of the recurring monthly rates for the minimum contract period (MCP). This view was shared by RTI.
16. In addition, Cybersurf submitted that SaskTel's proposed tariff should specify that point-to-point protocol over Ethernet (PPPoE) would be used to authenticate users.
17. IMCAIP noted that SaskTel stated that each aggregated high-speed service provider interface (AHSSPI) was limited to 1,000 virtual local area networks (VLANs). IMCAIP further noted that since SaskTel had treated each ADSL access as one VLAN, a competitor needed to obtain another AHSSPI as soon as it reached 1,000 customers. IMCAIP submitted that this limit was artificial and requested that the 1,000 VLAN limit should be removed. This view was supported by MTS Allstream.
18. Cybersurf submitted that SaskTel should be required to adhere to certain service level objectives and provide related credits for failing to meet those objectives. Cybersurf also submitted that requests for maintenance regarding this service should be addressed on a first-come, first-served basis. RTI submitted that SaskTel should share with competitors its actual and expected service levels.
19. Bell Canada submitted that SaskTel should confirm that the availability of its Aggregated ADSL Service would be the same as that of its retail high-speed Internet service and that the speed of the Aggregated ADSL Service in a particular wire centre would be the same as that offered to SaskTel's own retail customers that were served by that wire centre. Bell Canada further submitted that SaskTel should amend the wording of paragraphs 4 and 17 of the Conditions of Service in the proposed tariff to reflect this.
20. RTI submitted that SaskTel should provide information regarding the maximum speeds available in each wire centre as part of its tariff proposal. RTI also submitted that SaskTel should describe any limitations to the maximum speed stated in its proposed tariff.

Reply comments

21. In response to IMCAIP's assertion that Aggregated ADSL Service should be rated as a Category I competitor service, SaskTel argued that the service was not in the nature of an essential service because broadband access facilities could be obtained from at least two providers, SaskTel and the cable companies. SaskTel also argued that wireless broadband platforms could be deployed by competitors to duplicate the functionality provided by the ILECs using ADSL technology.
22. With respect to the issue of rates for Aggregated ADSL Service, SaskTel submitted that interveners had supported their arguments that the proposed rates were too high by comparing the rate per access to the retail rates for SaskTel's High Speed Lite service. SaskTel noted that this service was available on a retail basis in only 34 of the communities in which SaskTel offered its retail high-speed Internet service. SaskTel submitted that the majority of its retail customers were purchasing service at a much higher price than the High Speed Lite service, making the potential average revenue per customer higher than the rate for that service. However, in response to some of the interveners' concerns, SaskTel proposed to eliminate the volume-sensitive element of its rate structure and recommended revised rates for each of its one-, two-, and three-year contract terms.
23. SaskTel submitted that it was not willing to offer a non-contracted monthly rate for its Aggregated ADSL Service.
24. Regarding service charges associated with the Aggregated ADSL Service, SaskTel noted that the Commission had approved a service charge rate of \$225 per access for Bell Canada's High Speed Access (HSA) Service, which SaskTel considered to be more comparable to its Aggregated ADSL Service than Bell Canada's Gateway Access Service (GAS).
25. With respect to Cybersurf's comments regarding the Phase II costing approach used, SaskTel submitted that it had completed all cost studies in accordance with the Phase II costing principles outlined in its Phase II manual. SaskTel also submitted that the methodologies used to estimate the impact of fungibility, opportunity cost, dedicated versus shared capital, and capacities on costing considerations, as outlined in its Phase II costing manual, were reflected in the study it had filed as part of TN 102.
26. SaskTel noted that an LOA would be requested only in situations where a dispute arose between the end-user and either SaskTel or a competitor. SaskTel submitted that it would not expect a competitor to provide an LOA in support of every service request received from a competitor.
27. SaskTel noted that the proposed application of termination fees was consistent with article 60.2 in SaskTel's General Tariff item 50 – General Terms of Service. SaskTel submitted that it was not unreasonable to expect competitors to perform proper planning prior to specifying the contract term to which they chose to subscribe.
28. With respect to comments about the 1,000 VLAN limitation, SaskTel submitted that this limit reflected the capacity of the Ethernet switch that it had chosen to provision the AHSSPI. SaskTel also submitted that it had selected equipment that would meet the identified needs of

competitors, resulting in the use of a least-cost solution. SaskTel noted that in Bell Canada's GAS tariff, the VLAN limit for the 100 megabits per second AHSSPI was 256 VLAN, which was lower than SaskTel's proposed 1,000 VLAN limit. SaskTel further submitted that its proposed service configuration provided competitors with the same technical capabilities as those used by SaskTel.

29. SaskTel noted that it did not use PPPoE to provide its retail Internet services. SaskTel also noted that its high-speed Internet service was configured as an "always on" connection based on dynamic host configuration protocol (DHCP) distribution. SaskTel submitted that this allowed it to take new services to the market more quickly and simplified the process that customers used to connect to the Internet service. SaskTel argued that it should not be required to modify its network architecture to meet the perceived needs of competitors.
30. With respect to requests to provide information regarding service level objectives, SaskTel noted that its performance could vary from time to time and would be influenced by many factors, including seasonal loads, the availability of personnel, and the availability of equipment. SaskTel also noted that it did not provide service level guarantees to its retail customers that subscribed to services provided over ADSL technology and submitted that it was not prepared to provide service level guarantees to competitors subscribing to its Aggregated ADSL Service.
31. With respect to Bell Canada's request for clarification related to the wording of paragraphs 4 and 17 of the Conditions of Service of SaskTel's proposed tariff, SaskTel agreed that combining these two conditions into a single condition would remove the confusion identified by Bell Canada. SaskTel proposed the following wording:

The Service is available from the end-user's SaskTel service wire centre and shall be provided subject to the availability of suitable equipment and facilities as determined by SaskTel. SaskTel determines those of its serving wire centres which will support Aggregated ADSL service. Aggregated ADSL access is provisioned at the same speeds as SaskTel retail high speed Internet service in the wire centre serving the end-user. Maximum sustained speeds are not guaranteed.

32. With respect to RTI's request for a list of the wire centres that supported Aggregated ADSL Service and the speeds supported in each of these wire centres, SaskTel noted that no other ILEC had included such detailed information within their comparable tariffs. SaskTel submitted that as it enhanced its retail high-speed Internet service, this information would change, making it difficult to administer this information within this specific tariff item. SaskTel also noted that the detailed service information requested by RTI could be obtained via SaskTel's website.

Commission's analysis and determinations

33. The Commission notes that it has recently initiated a proceeding to review the regulatory issues related to competitor services in *Review of regulatory framework for wholesale services and definition of essential service*, Telecom Public Notice CRTC 2006-14, 9 November 2006

(Public Notice 2006-14). The Commission also notes that, for reasons discussed in Public Notice 2006-14, it expects to issue a decision on issues in that proceeding by mid-2008. In view of this and the period of time during which the competitor ADSL service issues under consideration in this Order have been outstanding, the Commission considers it appropriate to dispose of these issues on a final basis.

34. The Commission notes that, as with other services provided by ILECs, cable carriers, and CLECs at regulated rates to other competitors, the regulatory status of the competitor ADSL services approved in this Order is within the scope of the proceeding begun in Public Notice 2006-14.

Service classification

35. The Commission notes that SaskTel's Aggregated ADSL Service was proposed under the company's Competitor Access Tariffs as a Category II competitor service, and that this service, including the proposed classification, was granted interim approval in Order 2006-64.
36. The Commission notes that IMCAIP and Cybersurf requested that SaskTel be directed to lower rates for its Aggregated ADSL service by re-classifying its Aggregated ADSL service as a Category I competitor service.
37. The Commission considers the nature of the facility in question and circumstances relevant to its supply by competitors and third parties when it assesses whether to classify a competitor service as a Category I competitor service. A competitor service that does not meet the criteria for a Category I competitor service is classified as a Category II competitor service.
38. The Commission considers that competitors have other service alternatives to SaskTel's competitor ADSL services. The Commission notes that these other options for providing retail high-speed Internet services include co-locating their own ADSL equipment in SaskTel's central offices and using unbundled local loops purchased from SaskTel, or using an incumbent cable carrier's third-party Internet access services.
39. Accordingly, the Commission **denies** IMCAIP and Cybersurf's request to reclassify the components of the Aggregated ADSL Service as a Category I competitor service. The Commission determines that SaskTel's Aggregated ADSL Service should be classified as a Category II competitor service on a final basis.

Availability of additional speed offerings

40. The Commission notes that there are currently two forms of competitor ADSL tariffs provided by the ILECs: one in which distinct rates are provided by access speed, and a second, used by MTS Allstream and SaskTel, in which monthly rates are provided for the maximum available speed and which covers all classes of customers. The Commission further notes interveners' concerns regarding the difficulties they face in competing in the low-speed retail market under the single-rate approach that SaskTel proposed for its Aggregated ADSL Service.

41. The Commission notes that under SaskTel's single-rate approach, a competitor can acquire the Aggregated ADSL Access service from SaskTel for a rate of \$19 to \$23 per month, depending on the contract period, and provide service in any of the retail Internet markets – whether high-speed or low-speed, business or residential. The Commission considers that while a single-rate approach provides competitors with some flexibility in developing and pricing their retail services, this flexibility occurs where higher margins exist – for example, in the higher-speed or business markets, where SaskTel's retail rates are significantly higher than the \$23 per month competitor ADSL service rate. By contrast, SaskTel's low-speed retail service is priced at a level that is not appreciably higher than the \$23 per month rate and contains mark-ups that are significantly lower than SaskTel's higher-speed services. The Commission considers that the availability of a service that more closely matches the speed of SaskTel's low-speed retail Internet service would be in the public interest, since it would enable competitors to compete with SaskTel on a more equitable basis.
42. In light of the above, the Commission determines that SaskTel is to revise its competitor ADSL tariffs to introduce a low-speed Aggregated ADSL Service that coincides with SaskTel's low-speed retail offering and prices.

Issues related to rates, terms, and conditions

43. The Commission notes that its interim order with respect to SaskTel's Aggregated ADSL Service addressed a number of significant issues with respect to rates. The Commission also notes, however, that SaskTel's interim rate structure for its Aggregated ADSL Service contains certain terms and conditions, as discussed below, that are either inconsistent with those offered by other ILECs for comparable ADSL services or that, in the Commission's view, unduly restrict a competitor's ability to provision its services in the retail market. In finalizing the tariff for SaskTel's Aggregated ADSL Service, the Commission has had regard to various considerations, including the need to approve similar rates, terms, and conditions for comparable competitor ADSL services across ILECs so that competitors in all parts of the country have the same range of options available to them and can compete in multiple markets.
44. With respect to Cybersurf's concern that SaskTel did not properly apply the Phase II costing principles in its cost study, the Commission notes that it has reviewed SaskTel's cost study and associated methodology and determines that it is appropriate.

Month-to-month rates, and contract renewals

45. The Commission notes that there is currently no uniform approach among ILECs with respect to the issue of month-to-month rates² for competitor ADSL services. While SaskTel only offers MCP-based rates, MTS Allstream offers only month-to-month rates for its equivalent competitor ADSL service. The Commission also notes that in the retail market it is a common practice to offer both MCP-based rates and higher month-to-month rates. The Commission considers that offering the option of either MCP-based rates or month-to-month rates would remove a barrier to competitors being able to compete in the retail market on a more equitable basis – for example, by permitting competitors to offer trial promotions for a limited period of time.

² In this Order, the term "month-to-month rates" refers to monthly rates subject to a minimum contract period of one month; the term "MCP-based rates" refers to monthly rates subject to a minimum contract period that is greater than one month.

46. The Commission notes that in the current tariff pages, SaskTel requires competitors to subscribe to MCPs of either one, two, or three years. The Commission further notes that upon the expiry of a contract, competitors only have the option of renewing with MCP-based rates.
47. With respect to IMCAIP and RTI's comments regarding contract renewals, the Commission considers that the practice of locking competitors into subsequent contracts at the termination of the initial contract period could create additional difficulties for competitors when planning their retail offerings. The Commission recognizes that competitors benefit from lower monthly rates when ILECs offer such long-term contract periods. However, the Commission sees no reason why a competitor that reaches the contract's expiry date could not be given the option of transferring to month-to-month rates, rather than renewing with MCP-based rates. The Commission considers that in the absence of a month-to-month rate option, competitors would be unduly restricted with respect to the retail service offerings they may provide.
48. In light of the above, the Commission concludes that SaskTel should file proposed tariff revisions to modify its Aggregated ADSL Service tariff to include month-to-month rates for its service and to include the option to renew a contract using the then-available MCP-based rates or the month-to-month rates.

Service charges

49. With respect to IMCAIP and Cybersurf's requests that SaskTel should reduce the service charge for its Aggregated ADSL Service, the Commission considers that based on submitted costs, the rates proposed by SaskTel are reasonable. The Commission further notes that such service charges are designed to recover the one-time service installation costs arising from each order for new service. The Commission also notes that SaskTel's proposed service charge is similar to the service charges approved for MTS Allstream and Bell Aliant for similar services. The Commission therefore finds that the service charge proposed by SaskTel is appropriate.
50. The Commission notes, however, that other ILECs, such as TELUS Communications Company and Bell Canada, offer term payment options associated with the service charges for their comparable competitor ADSL services. The Commission further notes that one of the challenges faced by competitors is the overall cost of providing service to their retail customers.
51. In light of the above, the Commission considers it desirable to include the option of paying service charges in smaller monthly instalments for Aggregated ADSL Service, as proposed by several interveners, since this would lower a competitor's upfront costs associated with providing service to its retail customers.
52. Accordingly, the Commission concludes that SaskTel should file a tariff proposal introducing monthly payment options for its service charge associated with its ADSL access components for Aggregated ADSL Service.

Letters of authorization

53. The Commission notes that in response to interventions from Cybersurf and Bell Canada, SaskTel confirmed that end-customer LOAs would only be required in instances where a dispute arose between the end-user and SaskTel or a competitor. In the Commission's view, this procedure is reasonable and consistent with the manner in which LOAs are used by other ILECs in the marketplace.
54. In light of the concern with respect to the manner in which SaskTel applies its LOA policy, the Commission determines that it is appropriate that the policy be included in SaskTel's tariff to avoid any confusion on the part of competitors. Accordingly, the Commission concludes that SaskTel should issue revised tariff pages for its Aggregated ADSL Service to confirm that LOAs are only required when a dispute arises between the end-user and SaskTel or a competitor.

Termination charges

55. With respect to termination charges, the Commission notes that SaskTel is the only ILEC to require for all contract periods that 100 percent of the monthly charges for the remaining period of the contract be paid by the competitor in the event of early termination of the contract. By contrast, the other ILEC tariffs for equivalent services apply termination charges equal to 100 percent of the total remaining monthly payments for one-year contracts and 50 percent of the total remaining monthly payments for contracts in excess of one year.
56. The Commission notes that the principle of applying 100 percent of the total remaining payments for one-year contracts in the event of early contract termination is used to recognize a service provider's need to recover the service introduction costs over a relatively short time period. By contrast, the Commission considers that for the longer-term multi-year contract periods, the recovery of 50 percent of the remaining balance of the monthly charges would be sufficient to permit the recovery of any unrecovered costs in view of the avoided service costs and the potential re-use of the facilities associated with the provision of the service. The Commission also considers that, to the extent possible, the service terms and conditions for a given competitor service should be similar across the ILECs. The Commission therefore considers that for SaskTel's contract periods in excess of one year, the recovery of 50 percent of the remaining balance of the monthly charges associated with a contract would be appropriate.
57. Accordingly, the Commission determines that SaskTel should issue revised tariff pages for its Aggregated ADSL Service that include the following statement:

In the case of a one-year contract period, a service termination charge equal to the total remaining balance of the monthly rates for the contract period applies for early termination of the Service. In the case of a two- or three-year contract period, a service termination charge of 50 percent of the remaining balance of the monthly rates for the minimum contract period applies for early termination of the Service.

Service design

58. With respect to questions raised by Cybersurf regarding PPPoE, SaskTel stated that it did not use PPPoE to provide its Internet services to either retail or competitor customers. Given that SaskTel does not use PPPoE in its network architecture, the Commission does not consider it necessary to require SaskTel to modify its competitor service configuration to employ PPPoE.
59. With respect to IMCAIP's concerns regarding the 1,000 VLAN limitation for each AHSSPI, the Commission notes that the technology chosen by SaskTel to provide its Aggregated ADSL Service limits the number of VLANs per interface to 1,000. The Commission also notes that the limit of one VLAN per access is consistent with the manner in which SaskTel provisions its retail Internet services. The Commission considers that SaskTel has chosen a suitable service design, given the availability and cost of equipment and the anticipated demand for its service. Accordingly, the Commission determines that it would not be appropriate to require SaskTel to modify its service design with respect to either the number of VLANs per interface or the limit of one VLAN per access.

Service level guarantees and rate rebates

60. The Commission notes that SaskTel submitted that it does not provide service level guarantees to its retail or competitor service customers, given that performance can vary from time to time and is influenced by many factors, such as seasonal loads or the availability of personnel or equipment. In light of this, the Commission considers that competitor concerns regarding this matter have been satisfactorily addressed by SaskTel in its reply comments. In this respect, the Commission expects that an ILEC's service levels that apply to competitor ADSL services will, at a minimum, equal the service levels that apply to that ILEC's retail customers.
61. With respect to the issue of refunds for competitors in the case of network outages, the Commission notes that SaskTel's General Tariff item 68 – Terms of Service, specifies that in the case of a service interruption, a competitor may request a refund for the service proportionate to the length of time the problem existed. The Commission considers that when a problem in any part of SaskTel's network directly associated with providing competitor ADSL services would cause an end-user to lose its connection to the competitor's point of presence, this would be considered an outage. The Commission considers that in such a situation, the competitor would be entitled to request a refund for the portion of the monthly rate that is in proportion to the length of time of the outage.

Revisions to certain proposed conditions of service

62. With respect to Bell Canada's request to clarify SaskTel's intent with respect to paragraphs 4 and 17 of the Conditions of Service of SaskTel's tariff, the Commission notes that SaskTel agrees with Bell Canada's concern and has proposed to combine these two conditions into a single condition.

63. The Commission considers that it is important to ensure that SaskTel makes available its Aggregated ADSL Service to competitors in the same locations and coincident with the provision of equivalent services to its retail customers, in order to maintain a competitively neutral marketplace where underlying facilities are made available to all service providers. The Commission also considers that the tariff modification proposed by SaskTel is appropriate and directs SaskTel to issue tariff pages to reflect this modification.

Wire centres where service is available

64. The Commission notes that SaskTel has submitted that competitors can interconnect with its network in either the Regina or Saskatoon main wire centres and that service speed information regarding each wire centre is available from SaskTel's website. Accordingly, the Commission considers that SaskTel has adequately addressed RTI's concerns with respect to this matter.

Final approval and direction

65. In light of the above, the Commission **approves on a final basis**, subject to the changes noted above, SaskTel's TN 102 proposal, effective the date of this Order.
66. In addition, the Commission directs SaskTel to:
- issue revised tariff pages for its Competitor Access Tariff item 650.32 – Aggregated Asymmetric Digital Subscriber Line (ADSL) Service, within 30 days of the date of this Order, reflecting the Commission's determinations with respect to LOAs, termination charges and the proposed conditions of service outlined above, effective the date of this Order;
 - file, as part of its Competitor Access Tariff item 650.32 – Aggregated Asymmetric Digital Subscriber Line (ADSL) Service, within 30 days of the date of this Order, proposed tariff pages and proposed rates for a lower-speed Aggregated ADSL Service that coincides with SaskTel's retail lower-speed offering;
 - file, within 30 days of the date of this Order, proposed tariff revisions to modify its Competitor Access Tariff item 650.32 – Aggregated Asymmetric Digital Subscriber Line (ADSL) Service tariff to include month-to-month rates for its service;
 - file, within 30 days of the date of this Order, proposed modifications to the wording in the tariff pages for its Competitor Access Tariff item 650.32 – Aggregated Asymmetric Digital Subscriber Line (ADSL) Service, to indicate that competitors that renew their contracts may use the then-available MCP-based rates or may optionally transfer to the month-to-month rates; and

- file, within 30 days of the date of this Order, a tariff proposal to introduce monthly payment options for its service charge associated with its ADSL access components for its Competitor Access Tariff item 650.32 – Aggregated Asymmetric Digital Subscriber Line (ADSL) Service.

Secretary General

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