



Telecom Decision CRTC 2011-213

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Ottawa, 25 March 2011

Bell Aliant Regional Communications, Limited Partnership and Bell Canada – Revised Interconnection Agreement for the Provision of 9-1-1 Service to a Competitive Local Exchange Carrier

File number: 8638-C12-201019141

In this decision, the Commission approves Bell Aliant and Bell Canada's revised CLEC 9-1-1 Agreement and directs the companies to file revised tariff pages.

Introduction

1. The Commission received an application by Bell Aliant Regional Communications, Limited Partnership and Bell Canada (collectively, the Bell companies), dated 18 November 2010, proposing revisions to their Interconnection Agreement for the Provision of 9-1-1 Service to a Competitive Local Exchange Carrier (CLEC) [the CLEC 9-1-1 Agreement]. The Bell companies filed these revisions pursuant to the Commission's directions in *Bell Aliant Regional Communications, Limited Partnership and Bell Canada – Proposed revision to the Interconnection Agreement for the Provision of 9-1-1 Service to a Competitive Local Exchange Carrier*, Telecom Decision CRTC 2010-693, 17 September 2010.
2. In that decision, the Commission directed the Bell companies to amend their CLEC 9-1-1 Agreement to (a) provide that the costs of any third-party audit are to be shared equally between the Bell companies and the CLEC, and (b) clarify that CLECs shall report either the number of network access services (NAS) or the number of working telephone numbers (WTNs) for their end-customers for billing purposes in accordance with the way that the Bell companies' retail tariffs state that their own retail customers are to be billed for 9-1-1 service. Interested parties were provided the opportunity to comment on the revised CLEC 9-1-1 Agreement.
3. The Commission received comments from MTS Allstream Inc. (MTS Allstream), Quebecor Media Inc. (QMI) on behalf of Videotron Ltd., Rogers Communications Inc. (RCI), and TELUS Communications Company (TCC).
4. The public record of this proceeding, which closed on 17 January 2011, is available on the Commission's website at www.crtc.gc.ca under "Public Proceedings" or by using the file number provided above.

5. The Commission has identified the following issues to be addressed in this decision:
 - I. Should the Commission approve the Bell companies' revised CLEC 9-1-1 Agreement?
 - II. Should the Bell companies' revisions to their implementation support document be reviewed by interested parties and the CRTC Interconnection Steering Committee (CISC)?

I. Should the Commission approve the Bell companies' revised CLEC 9-1-1 Agreement?

6. Parties to the proceeding generally found the Bell companies' proposed revisions to the CLEC 9-1-1 Agreement to be acceptable. However, QMI requested clarification about the application of 9-1-1 fees to (a) Megalink service and (b) multi-line services used by fixed local service resellers to access the public switched telephone network (PSTN).

(a) Megalink service

7. QMI requested clarification about whether, when assessing monthly 9-1-1 fees, the word "connection" in the Bell companies' General Tariff item 1400.6(d) refers to an entire primary rate interface (PRI) facility or to an individual channel within that facility.
8. The Bell companies explained that the 9-1-1 rate applies to each channel within a PRI facility that is equipped to call the PSTN, which means that the charge would apply 23 times for a typical PRI facility.
9. The Commission considers that the Bell companies have clarified that they charge 9-1-1 fees associated with Megalink service on a per-channel basis. However, the Commission considers that this clarification should be inserted into the associated tariff.

(b) Multi-line services used by fixed local service resellers

10. QMI also requested clarification about the method by which incumbent local exchange carriers (ILECs) would charge 9-1-1 fees to a CLEC when the CLEC provides multi-line services to permit a fixed local service reseller to access the PSTN. QMI requested that the Commission issue a directive clarifying that, in these circumstances, 9-1-1 fees should be assessed based on the number of end-user WTNs supported, rather than on the basis of the number of connections and/or DS-0 accesses associated with the PSTN interconnection facilities.
11. The Bell companies submitted that their reseller customers that use Megalink¹ to provide local services are charged per WTN and the associated 9-1-1 address records are included as part of the Bell companies' 9-1-1 counts and in the annual 9-1-1 rate

¹ In their reply, the Bell companies highlighted a portion of section 6.1 of their proposed agreement which states "that 'Megalink' and 'Digital Exchange Access service' are to be reported together as 'multi-line'."

calculation. The Bell companies further submitted that CLECs that resell Megalink service for fixed voice over Internet Protocol (VoIP) service should be submitting individual 9-1-1 address and class of service records for each WTN to the 9-1-1 database, as suggested by QMI.

12. The Commission considers that the Bell companies have clarified that when a CLEC provides multi-line services to permit a fixed local service reseller to access the PSTN, the 9-1-1 fees should be charged per WTN. Accordingly, the Commission considers that it is not necessary to issue a directive to the Bell companies on this matter. However, the Commission considers that this clarification should be inserted into the associated tariff, including an indication of which specific tariff line item to use.

Conclusion

13. In light of the above, the Commission **approves** the Bell companies' revised CLEC 9-1-1 Agreement with the above-noted clarifications. The Commission directs the Bell companies to file revised tariff pages to reflect the above-noted clarifications within 10 days of the date of this decision.

II. Should the Bell companies' revisions to their implementation support document be reviewed by interested parties and CISC?

14. MTS Allstream and RCI expressed concern that the Bell companies had made changes to a confidential revised version of an implementation support document (ISD) without review by interested parties and CISC, or Commission approval.
15. The Commission notes that the Bell companies' CLEC 9-1-1 Agreement states that the ISD may be amended from time to time by the Bell companies. The Commission also notes that it has not approved revisions to the ILECs' respective ISDs in the past. Further, the Commission considers that no party has raised a substantive concern about the Bell companies' proposed changes to the ISD. Accordingly, the Commission finds that the changes to the Bell companies' ISD require no additional review or approval.

Secretary General