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July 23, 2010

Mr. Robert A. Morin
Secretary General
Canadian Radio-television and
Telecommunications Commission
Ottawa, ON K1A 0N2

Dear Mr. Morin:

Re: Pending Applications for Forbearance from the Regulation of Residential Local Exchange Services in various exchanges in Alberta, British Columbia, and Québec, Commission file numbers 8640-T69-200909369, 8640-T69-200909343, 8640-T69-200904690, 8640-T66-200814881, 8640-T66-200904765, 8640-T66-200909319, 8640-T69-200910324

1. TELUS Communications Company (“TELUS” or the “Company”) has previously filed residential local exchange forbearance applications that were assigned the following Commission file numbers.

8640-T69-200909369
8640-T69-200909343
8640-T69-200904690
8640-T66-200814881
8640-T66-200904765
8640-T66-200909319

2. Following an application filed by MTS Allstream¹ regarding competitor quality of service (“CQoS”) indicator 1.19, Requested Due Dates Met – CDN Services, the Commission issued Decision 2009-514.² In that Decision, the Commission ordered ILECs to revise past results for CQoS indicator 1.19 and stated that:

[it] will take no further action to dispose of a pending forbearance application until the ILEC in question has submitted revised results

¹ *Part VII Application Concerning Provisioning of Competitor Digital Network Services in Accordance with Competitor Quality of Service Standards*, dated December 18, 2008.

² *MTS Allstream Inc. – Application concerning provisioning of competitor digital network services in accordance with competitor quality of service standards*, Telecom Decision CRTC 2009-514, dated August 21, 2010. (“Decision 2009-514”).

or an explanation to the satisfaction of the Commission as to why revised results are not required.³

3. As a result, each of the forbearance applications listed in paragraph 1 were designated as pending by the Commission,⁴ meaning that the Commission has yet to render a decision on these applications, some of which date as far back as October 2008.
4. TELUS confirms that the Company has implemented the determinations made by the Commission in Decision 2009-514. In a separate application that TELUS is filing today, TELUS includes CQoS results for indicator 1.19 that are in accordance with the Commission's determinations set out in Decision 2009-514 for the period of December 2009 to May 2010. TELUS also confirms that these results meet the standard required for this indicator.
5. TELUS notes that in the proceedings initiated by the forbearance applications listed in paragraph 1, the answer and reply stages have already been completed. All of the competitors identified in each of the applications have already confirmed whether or not they meet the competitive presence test as stipulated in Telecom Decision CRTC 2006-15, *Forbearance from the regulation of retail local exchange services*, as varied by the Governor-in-Council P.C. 2007-0532.
6. Therefore, the only outstanding issue for these applications was whether TELUS' results for CQoS indicator 1.19 were calculated in compliance with Decision 2009-514. Given that TELUS has now confirmed that this is now the case, the Commission has all of the information to make its determination as to whether TELUS should be granted residential local exchange forbearance for the exchanges identified. Therefore, TELUS requests that the Commission forthwith render its determinations on each of these applications.
7. Finally, TELUS previously filed another residential local exchange application concerning a request for forbearance in the Quebec exchange of St-Agapit based on the Commission's historic forbearance framework from Telecom Decision CRTC 94-19, *Review of the regulatory framework* ("Decision 94-19"). This

³ Decision 2009-514, para. 31.

⁴ Commission staff had also designated TELUS' forbearance applications as pending prior to the issuance of Decision 2009-514.

application was assigned Commission file number 8640-T69-200910324. TELUS asks that the Commission render a ruling that the Decision 94-19 forbearance framework remains available for ILECs to request local exchange forbearance.

Yours truly,

{Original signed by Ted Woodhead}

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MD/cs

cc: Interested parties to Decision 2006-15
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