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9 February 2018

Board Secretary
Ontario Energy Board
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Toronto, Ontario
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Subject: Review of Miscellaneous Rates and Charges (EB-2015-0304) Draft Report of the Board – Framework for Determining Wireline Pole Attachment Charges

The Lansdowne Rural Telephone Company Ltd. is responding to the OEB's call for submissions on its Draft Report – Framework for Determining Wireline Pole Attachment Charges issued December 18, 2017.

We have grave concerns about the conclusions in the Draft Report and, in particular, the intention to impose a \$52 rate across the Province final rate derived in the Draft Report. The \$52 rate represents an incredible increase of over 230%, over the last 13 years. This far exceeds the rate of inflation! It doesn't make sense that pole attachment rates in Ontario are double the average rate in the rest of Canada, and quadruple what we pay to go on a Bell pole that also has power equipment on it – why does the OEB intend to set a rate that is quadruple the rate for a Bell pole which is exactly the same service?

In our service area we have no option to bury cable, it is not feasible, we have to use the Hydro One poles. An increase of 230% would mean maintenance and construction would be cut back and our first-class service to our valued customers would suffer. Any future projects of upgrading and expanding service would be put on hold or even stopped. We are a small rural company and putting the extra costs down to our customers is not possible.

We do not understand why regulators in the US are creating rules that are specifically designed to reduce barriers to broadband deployment, yet, here in Ontario, we are doing the exact opposite under the direction of the OEB.

The Board must not proceed with the recommendations in the Draft Report and it should “table” or abandon it and hold pole rates at \$22.35 plus inflation until it figures out how to address this matter properly.

Yours truly,

A handwritten signature in cursive script, appearing to read "William Grier".

William Grier
General Manager

Cc: The Honourable Glen Thibault
The Honourable Bob Chiarelli
The Honourable Navdeep Bains
MPP Steve Clark
MP Gord Brown
Mayor Joseph Baptista