



612 St-Jacques Street, 15th Floor
Montreal, Quebec H3C 4M8

Direct line: 514 380-4792
Email: regaffairs@quebecor.com
Internet: www.quebecor.com

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BY EMAIL (boardsec@oeb.ca)

Kirsten Walli
Board Secretary
Ontario Energy Board
P.O. Box 2319
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4

RE: File Number EB-2015-0304 - Review of Miscellaneous Rates and Charges - Draft Report of the Board - Framework for Determining Wireline Pole Attachment Charges - Comments of Quebecor Media Inc. (Quebecor Media) on behalf of its affiliate Videotron Ltd¹ (Videotron)

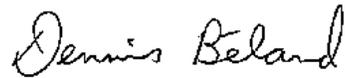
1. By way of this letter, Quebecor Media, on behalf of Videotron, hereby responds to the Board's call for submissions issued on 18 December 2017 regarding its draft report (the Draft Report) setting out a policy for the wireline pole attachment rates charges by local distribution companies (LDCs) for the attachments of telecommunication and cable companies to distribution poles.
2. As a general comment, Quebecor Media is greatly concerned by the fact that a review exercise initially launched with the core objective of reviewing the methodology for setting the wireline pole attachment rate and to be carried out by a working group composed of a limited number of stakeholders has resulted, most notably, in a proposal to radically increase the current province-wide wireline pole attachment rate from \$22.35 per pole per year to \$52.00 per pole per year.
3. On a more specific level, Quebecor Media has had the opportunity to review the comments and supporting reports filed by Rogers Communications Canada Inc. (Rogers) in response to the Board's call for submissions. We submit that the numerous

¹ We note that pursuant to a corporate reorganization completed 29 December 2017, all the telecommunications operations and assets of the former Videotron G.P. were transferred to its affiliate Videotron Ltd.

methodological failings in the Draft Report, as identified by Rogers, are sufficiently serious as to call into question its usefulness as an element of the Board's decision making process.

4. Quebecor Media therefore wholeheartedly supports Rogers' comments and urges the Board not to proceed with the recommendations put forth in the Draft Report. In our opinion, a more appropriate course of action for the Board would be to either:
 - adjust the current province-wide attachment rate of \$22.35 per pole per year (in place since 2005) for twelve years of inflation; or
 - hold a full, fair and proper hearing focussed on the review of the current province-wide attachment rate of \$22.35 per pole per year.
5. Trusting this is satisfactory, we remain,

Yours truly,



Dennis Béland
Vice-President, Regulatory Affairs
Telecommunications

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