

February 9, 2018

Board Secretary
Ontario Energy Board
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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

Execulink Telecom Inc. 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, in particular, the intention to impose a \$52 rate across the Province. The \$52 rate represents an incredible increase of 230%, over the last 13 years. This far exceeds the rate of inflation! It does not 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?

An immediate increase in pole attachment rates to \$52, chargeable by all Ontario hydro utilities, will add tens of thousands of dollars to Execulink's operating costs. Inevitably this burden will be passed on to our customers through rate increases.

There is no doubt that high pole rates, both immediately and in the future, will inhibit the growth of our broadband networks. Execulink, must carefully consider the impact of this significant rate increase and the potential de-regulation in any future expansion plans.

While all levels of Government are advocating for access to faster and more reliable broadband in rural and remotes areas it would be unfortunate if service providers, like Execulink, were not able to expand their footprint due to the imposition of excessive pole attachment rates.

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 black ink that reads "Martha Facey". The signature is written in a cursive, flowing style.

Martha Facey
Corporate Affairs

Cc: The Honourable Glen Thibault
 The Honourable Bob Chiarelli
 The Honourable Navdeep Bains
 Mr. Ernie Hardeman, MPP Oxford
 Mr. Dave McKenzie, MP Oxford
 Mr. David Mayberry, Warden Oxford County

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