



***PUBLIC INTEREST ADVOCACY CENTRE
LE CENTRE POUR LA DEFENSE DE L'INTERET PUBLIC***

ONE Nicholas Street, Suite 1204, Ottawa, Ontario, Canada K1N 7B7

Tel: (613) 562-4002. Fax: (613) 562-0007. e-mail: piac@piac.ca. <http://www.piac.ca>

Michael Janigan
Counsel for VECC
613 562-4002 ext. 26

August 9, 2011

VIA E-MAIL

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
P.O. Box 2319
2300 Yonge St.
Toronto, ON
M4P 1E4

Dear Ms. Walli:

**Re: Board File No.: EB-2011-0120
Canadian Distributed Antenna Systems Coalition (CANDAS)
Interrogatories of the Vulnerable Energy Consumers Coalition (VECC)**

As per Procedural Order No. 1 dated June 13, 2011, please find enclosed the Interrogatories of VECC in the above-noted proceeding. We have also directed a copy of the same to the applicant, their counsel and all registered intervenors via-mail.

Yours truly,

Original signed

Michael Janigan
Counsel for VECC

ONTARIO ENERGY BOARD

IN THE MATTER OF the *Ontario Energy Board Act, 1998*,
S.O. 1998, c. 15, Sch.B,

AND IN THE MATTER OF an Application by Canadian Distributed Antenna
Systems Coalition (CANDAS) for certain orders under the *Ontario Energy Board
Act, 1998*.

**INTERROGATORIES OF THE
VULNERABLE ENERGY CONSUMERS COALITION
(VECC)**

August 9, 2011

**Canadian Distributed Antenna Systems Coalition (CANDAS)
EB-2011-0120**

**VULNERABLE ENERGY CONSUMERS COALITION (VECC)
INTERROGATORIES**

Interrogatory #1

Ref: Written Evidence of Tormod Larsen, Application of CANDAS, April 21, 2011

Issue: Physical Configuration of DAS Network

- a. The evidence on pp 5-6 provides that a DAS node site is connected by a fibre optic connection between the remote radio unit and the BTS hub. Please describe the physical process of interconnection, the ownership of the cable, and how it reaches the hub.
- b. Please provide all differences between the pole attachments required for the applicant's DAS network and:
 - (i) Attachments required by wireline network providers currently attached
 - (ii) Attachments required by wireless providers (e.g.) TTC currently permitted by THESL (Application of CANDAS, 10.21)
- c. Please describe the additional safety concerns, if any, that might be associated with the pole attachments required for the applicant's DAS network and the attachments set out in (b) above. Please reference the letter of THESL of August 13, 2010, in relation to the safety problems cited therein, and whether the concerns apply to the attachments set out in (b)
- d. The evidence of Tormod Larsen indicates that the DAS network can be used by multiple users (p.6). Please quantify this capacity, and specify what are the "other telecommunications services" referenced on this page that the DAS network can be used for.
- e. Can you quantify the economic burdens associated with a switch from the planned DAS network configuration with pole attachments to other options, such as macrocell units, discussed in the evidence of Mr. Larsen?

Interrogatory #2

Ref: Application of CANDAS, April 21, 2011, Evidence of Bob Boron

Issue: Scarcity of Supply

- a. What facts does CANDAS rely upon to negate the position expressed in THESL's letter of April 21, 2011 (p.79 of the Application) that in light of the limited space available on poles, that mandated access to poles by wireless networks should not be granted as it is non-essential?
- b. In the event that pole attachment is found by the Board to be a limited resource, how does CANDAS propose that the rights of attachment should be allocated?
- c. In the event that there is found to be a scarcity of supply should the attachment fee reflect a premium as a result of the same?
- d. How does CANDAS propose to deal with other wireless carriers that wish to connect with the CANDAS network? Should the Board provide for terms of interconnection for DAS network providers?

Interrogatory #3

Ref: Evidence of Lemay-Yates (L-Y) Associates, Evidence of Tormod Larsen
Issue: Public Interest in Wireless Services

- a. Page 10 of the L-Y evidence sets out Sec. 7 of the *Telecommunications Act* that provides in 7 (b) that “provision of reliable and affordable telecommunications services to Canadians ...” is part of a national telecommunications policy. The L-Y evidence on page 7 notes that “many consumers have disconnected their wireline or conventional home phone service and now rely exclusively on their mobile home phones for voice communications.
 - (i) Please discuss the potential benefits from improved access and affordability, particularly to low-income consumers, associated with the availability of wireless services offered by members of the CANDAS coalition.
 - (ii) Please provide a chart that sets out the current cost of local voice service provided through wireline carriers, traditional incumbent wireless providers, and new entrant wireless providers, such as Public Mobile.
 - (iii) Please also provide any observations with data, where available, concerning matters of price, choice, and effect on market share of wireless services associated with the results of the 2008 Industry Canada spectrum auction.
- b. Mr. Larsen’s evidence at page 7 references “other services” to be provided. Please indicate what services are contemplated being offered by the members of the CANDAS coalition and what impact may these offerings have upon the market for the same.
- c. L-Y evidence (p. 32) concludes that wireless attachments to utility poles are necessary to bring “high capacity mobile broadband networks closer to the end customer and provide high quality coverage in many areas”. If the Board shares this view, please briefly describe and comment on the effectiveness of the CRTC’s Interconnection Steering Committee (CISC) model as a mechanism to resolve future difficulties between utilities and wireless providers.

*****End of Document*****