



PUBLIC INTEREST ADVOCACY CENTRE
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September 12, 2011

VIA E-MAIL

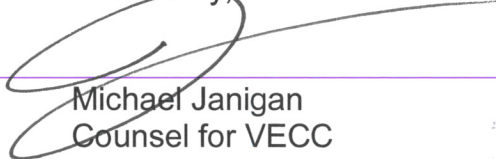
Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
P.O. Box 2319
2300 Yonge St.
Toronto, ON
M4P 1E4

Dear Ms. Walli:

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

Further to your letter of September 7, 2011, we have enclosed the Interrogatories of VECC with respect to the intervenor evidence of THESL. We have also directed a copy of the same to the applicant, their counsel and all registered intervenors via-mail.

Yours truly,



Michael Janigan
Counsel for VECC

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

September 12, 2011

**INTERROGATORIES
of the
VULNERABLE ENERGY CONSUMERS COALITION (VECC)
on the
Intervenor Evidence of THESL**

Interrogatory #1

1. In THESL's materials and motion, it submits that the poles in issue are not essential facilities because of technically viable alternatives to attachment. Does THESL believe that the essential facilities test also has an economic component, and if so how is it met?

Interrogatory #2

2. The effect of THESL's position would be to benefit wireless competitors of members of CANDAS that also happen to have their wireline attachments on THESL poles. To what extent does THESL believe that the Board should be concerned about the effect on competition in telecommunications.

Interrogatory #3

3. In the event that the Board finds that the poles are essential facilities, and wireless attachments are in scope of the CCTA order, will the current method of allocation and pricing structure be fair to all stakeholders? If not, how can it be changed without conferring a benefit to existing holders of attachments.

Interrogatory # 4

4. Can you provide the date when THESL first determined that the CCTA order did not apply?

Interrogatory # 5

5. In the event that THESL was successful in showing sufficient competition in the provision of attachments for wireless antenna use (and presumably wireline use, as well) to allow the Board to forbear from the regulation of attachment policy and rates, please explain how forbearance would affect the regulatory treatment of revenues obtained by THESL from attachments in the future.

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