

September 12, 2011

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

Dear Ms. Walli:

Re: Interrogatories on Intervenor Evidence – Canadian Distributed Antenna System Coalition (CANDAS) – Board File No. EB-2011-0120

The Electricity Distributors Association (EDA) is the voice of Ontario's local distribution companies (LDCs). The EDA represents the interest of 78 publicly and privately owned LDCs in Ontario, serving all Ontarians through 4.7 million residential, business and industrial customer accounts.

Please find attached the EDA's interrogatories on evidence filed by Toronto Hydro-Electric System Limited and the Canadian Electrical Association regarding the CANDAS application Board file No. EB-2011-0120.

Please do not hesitate to contact me if you have any questions on the EDA's submission.

Yours truly,



Teresa Sarkesian
Vice President, Policy and Government Affairs

cc. Helen Newland, Fraser Milner Casgrain LLP (by email)
Michael Schaffer, Fraser Milner Casgrain LLP (by email)
Alan Mark, Norton Rose OR LLP, Counsel to the EDA (by email)
All intervenors (by email)

Interrogatories on THESL filed evidence – EB-2011-0120

Evidence of Michael Starkey, President OSI Consulting

1. At pages 26 to 32, Mr. Starkey refers to potential co-location sites in Toronto.

Why are these sites considered as potential co-location sites? Are sites where there are already attachments typically available for use by other attachers? Is there mandatory sharing required for any of these sites? Are these sites, or some of them, controlled by resellers whose business it is to allow multiple attachers? Does Mr. Starkey know if the 25 Public Mobile locations are single or multiple user sites?

2. At page 55, Mr. Starkey refers to the attachment prices charged by the City of Chicago.

Does Mr. Starkey know the derivation of these charges, e.g. are they cost based or market based? Is there mandatory access? Are there multiple users associated with these attachments, such that the actual cost to each user would be lower?

3. Relatedly, is Mr. Starkey aware, either based on the evidence filed by CANDAS or from other sources, whether the DAS network proposed in this case would in whole or in part be available for sharing with other carriers? If so, would some additional attachments still be necessary? If so, who would determine the price charges by the owners of the installed equipment to other users? Could revenues exceed the CCTA rate proposed by the Applicants?

Evidence of Mary Byrne, Manager, Standards & Policy Planning THESL

No interrogatories

Evidence of Dr. Yatchew, Prof of Economics, University of Toronto

1. At page 22, Dr. Yatchew talks about the possibility of regulatory arbitrage.

What information does Dr. Yatchew have regarding the market prices at which the applicants could sub-lease the attachment proposed by them? Is there some mechanism available to ensure that some of that spread goes to the pole owner and its ratepayers?

2. At page 23, Dr. Yatchew notes that mandated attachment at other than market rates would distort the development of relevant siting markets.

Could this distortion ultimately result in a shortage of attachment sites for carriers wishing to deploy DAS or other micro site technologies in the future? Is there a risk that what is proposed by CANDAS will impede deployment of future networks and impede their competitors?

Interrogatories on CEA filed evidence – EB-2011-0120

Evidence of LCC International

1. At page 10, LCC discusses "Neutral Host" capability.

Please indicate which, if any, components of a DAS network of the type described in the Applicants filing (and which are listed at page 18 of the LCC evidence) can be shared with other carriers? Can LCC discern from the evidence filed by the Applicants which, if any components of the proposed DAS network will in fact be capable of, and made available for, sharing with other carriers?

2. At page 21, item (f), LCC refers to the "pricing model".

What are the possible pricing models which can be applied to determine the price if the Board were to mandate attachment but not the current price in the CCTA order?