

**IN THE MATTER OF** the Ontario Energy Board Act,  
1998, S.O. 1998, c.15 (Schedule B);

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

**INTERROGATORIES FROM THE CONSUMERS COUNCIL OF CANADA  
ON THE REPLY EVIDENCE OF PATRICIA D. KRAVTIN**

1. On Page 17 of her Reply Report, Ms Kravtin makes the following assertion:

For example, data on alleged “safety violations” associated with pole attachments with which I am familiar, have shown violations associated with attachments of the utility’s own distribution equipment at the same rate, if not higher, than those associated with third-party attachments.

What is the “data on alleged “safety violations” that Ms Kravtin is referring to? Please provide copies of that data.

2. On page 17 of her Reply Report, Ms Kravtin makes the following statement:

Accordingly, such concerns [safety, operational or engineering concerns] are not proper grounds for denying the same non-discriminatory right of access to utility poles for all telecommunications carriers, without regard to whether the attachments involve wireline or wireless facilities.

- (a) Is Ms. Kravtin aware of any jurisdiction, in Canada or the United States, which has denied the non-discriminatory right of access to utility poles for all telecommunications carriers, without regard to whether the attachments involve wireline or wireless facilities, based on safety, operational or engineering concerns? If so, please identify the relevant jurisdictions, and provide copies of

any decisions or orders reflecting those concerns as the basis for denying that right of access.

- (b) Please provide copies of any decisions by regulatory authorities in jurisdictions in Canada or the United States, in which the issue of safety, operational, or engineering concerns has been addressed through reliance on existing electrical safety codes or other objective standards of access.
- (c) Has Ms Kravtin examined the existing electrical safety codes and objective standards of access in Ontario? If so, is she satisfied that the safety, operational and engineering concerns identified by Ms Byrne can be satisfied by reliance on those existing codes and standards?

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