

Michael Piaskoski

350 Bloor Street East, 6th Floor
Toronto, Ontario M4W 0A1
michael.piaskoski@rci.rogers.com
o 416.935.4808
m 416.508.6474

VIA EMAIL AND COURIER

December 22, 2017

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: File Number EB-2015-0304: Policy Consultation of Wireline Pole Attachment Charges

Rogers Communications Canada Inc. ("**Rogers**") is in receipt of the *Draft Report of the Board on a Framework for Determining Wireline Pole Attachment Charges* ("**Draft Report**") and the Wireline Pole Attachment Rate and Policy Framework study prepared by Nordicity ("**Nordicity Study**") that were issued by the Board on Monday, December 18. Rogers provides this letter on its own behalf, as well as behalf of all of the other carrier companies who are listed in Appendix A of the Draft Report.

Rogers notes that the Nordicity Study is more than 80 pages (including appendices) and includes detailed analysis of data from a variety of sources, including prior OEB and other provincial utility board decisions and data submitted by some of the local distribution companies (LDCs) during the Pole Attachment Working Group (PAWG) process.

The Draft Report is 50 pages (including appendices) and supplements the Nordicity Study with the Board's own methodological approach and pole attachment rate recommendations.

The Draft Report was released on December 18, 2017 and the Board has established a January 22, 2018 deadline for interested stakeholders to submit comments. Rogers respectfully submits that insufficient time has been allotted for parties to analyze the Draft Report and the Nordicity Study, consult with the appropriate experts, and prepare comprehensive submissions, including any supporting evidence that might be required. The insufficiency of the comment period is exacerbated by the fact that more than a week of the allotted period falls during the holiday season when experts and other necessary personnel might not be available.

Given the magnitude of the increase in the pole attachment rate proposed in the Draft Report, and given the nature of the evidence and analysis upon which that proposed rate is based, Rogers submits that principles of natural justice and procedural fairness dictate that parties must be given a reasonable amount of time in which to prepare their responses.

Rogers respectfully requests that the deadline for filing comments on the Draft report be extended to Wednesday, February 28, 2018.

Yours truly,

A handwritten signature in blue ink, appearing to read 'Michael E. Piaskoski', with a stylized, flowing script.

Michael E. Piaskoski
Director, Municipal and Industry Relations
Corporate Affairs
Rogers Communications

c. The carrier companies