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**Jonathan L. Holmes**  
Executive Director  
regulatory@itpa.ca

5 January 2018

**By Electronic Mail**

Ms. Kirsten Walli  
Board Secretary  
Ontario Energy Board  
P.O. Box 2319  
2300 Yonge St, 27<sup>th</sup> Floor  
Toronto, Ontario  
M4P 1E4

Dear Ms. Walli:

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

1. The Independent Telecommunications Providers Association (“the ITPA”) is submitting this letter on the behalf of its 18 member companies that serve rural and remote areas across the Province of Ontario. The list of these member companies can be found in the Appendix to this letter.
2. As you are aware, on 18 December 2017, the Board issued its *Draft Report of the Board on a Framework for Determining Wireline Pole Attachment Charges*, almost 10 months after that proceeding had closed. At the time of issuance, the Board asked all interested stakeholders to provide comments by 22 January 2018. Since then, Rogers Communications sought an extension to 28 February 2018 but was denied. Instead, the Board set a deadline of 31 January 2018.
3. While we appreciate the Board granting this extension, we strongly believe that the 31 January 2018 deadline is still not sufficient for us to prepare and submit comments. The recommendations in the Draft Report will have a material effect on the operations of our individual members and we must now reach out to each of them to solicit their comments and concerns. Given that the Draft Report was issued immediately before the holiday break and many people are not returning until 8 January 2018, this

leaves just over three weeks to gather information from member companies and pull together comments. Therefore, we respectfully request that the deadline be extended to 14 February 2018.

Thank you for your consideration of this request.

Yours truly,

A handwritten signature in black ink, appearing to read "Jonathan L. Holmes". The signature is written in a cursive style with a large initial "J" and "H".

Jonathan L. Holmes

## **Appendix**

### **Ontario Members of the Independent Telecommunications Providers Association (ITPA)**

Brooke Telecom Co-operative Limited  
Bruce Telecom  
Cochrane Telecom Services  
Execulink Telecom Inc.  
Gosfield North Communications Co-operative Limited  
Hay Communications Co-operative Limited  
Huron Telecommunications Co-operative Limited  
The Lansdowne Rural Telephone Company Limited  
Mornington Communications Co-operative Limited  
Nexicom Telecommunications Inc.  
Nexicom Telephones Inc.  
North Frontenac Telephone Corporation Limited  
North Renfrew Telephone Company Limited  
Quadro Communications Co-operative Inc.  
Roxborough Telephone Company Limited  
Tuckersmith Communications Co-operative Limited  
WTC Communications  
Wightman Telecom Limited

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