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Ontario Energy Board
P.O. Box 2319
2300 Yonge Street, Suite 2700
Toronto, Ontario M4P 1E4
Attention: Board Secretary

Sent via email to boardsec@oeb.ca

RE: Review of Miscellaneous Rates and Charges (EB-2015-0304)
Draft Report of the Board – Framework for Determining Wireline Pole Attachment Charges

Kawartha Cable Internet (member of the CCSA) is responding to the OEB's call for submissions on its Draft Report – Framework for Determining Wireline Pole Attachment Charges issued December 18, 2017.

We have serious concerns about the conclusions in the Draft Report and, in particular, the intention to impose a \$52 rate across the Province.

As a rural operator of a cable network, this will seriously impact our ability, and that of other providers, to service rural customers with reliable broadband internet. The proposed increase of the rate to \$52, is double our current rates and will add significant cost of operations to our network. This may even result in abandonment of some of our network and potential loss of reliable broadband services to rural residences with no other options.

Our rural operations will not be able to support such a rate increase. The income rate in these areas is not particularly high and a rate increase would be difficult if not impossible for our customers (as well as most others in rural areas) to absorb. This directly conflicts with the policies and programs in place to expand broadband to rural communities as set out by ISED programs like "Connecting Canadians", and "Connect to Innovate", along with local Ontario programs like EORN and SWIFT.

Kawartha Cable was planning a significant build-out of our fiber network. This was planned to be an overhead pole attachment based build due to the distance and speed required. These increased pole rates will increase costs and cause significant delays to our build-out. We will also have to review this build and look at moving it to an underground installation. Some of this project will not move forward with the new attachment rates. This will again decrease broadband coverage in rural Ontario. It will also result in less additional revenue for the pole owners.

We do not understand and seek an explanation on why pole attachment rates in Ontario are double the average rate in the rest of Canada. We would also like to know why these rates are four times as much as Bell pole attachment rates which in many cases also have power attached.

In addition, we do not understand and require an explanation for utility pole rates remaining at \$22.35.



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We believe that proceeding with the recommendations in the Draft Report will cause substantial negative impact to the delivery of broadband services.

We respectfully request that the recommendation to increase rates be rejected and that the pole rates be held at \$22.35 plus inflation while the Board investigates more appropriate and sustainable courses of action. If the Ontario Energy board cannot accommodate these requests then we submit that the governance of telecommunications pole attachments be reassigned to the jurisdiction of the CRTC.

Thank you for your time and consideration

A handwritten signature in black ink, appearing to read 'Dan Barnes', is written over a horizontal line.

Dan Barnes
Dan Barnes
CEO
Kawartha Cable Internet

413 Eldon Rd,
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K0M2C0

CC:

The Honourable Glen Thibault
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The Honourable Bob Chiarelli
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Laurie Scott, MPP (Haliburton—Kawartha Lakes—Brock)
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Standing Committee on Natural Resources

Mayor Andy Letham, Mayor, City of Kawartha Lakes
(submitted via online contact page)

Councillor John Pollard, Councillor, City of Kawartha Lakes
(submitted via online contact page)

Mayor John Grant and Councillors of Brock Township,
(submitted via online contact page)

Mayor Thomas Rowett and Councillors of Scugog Township,
(submitted via online contact page)