



Telecom Decision CRTC 2016-65

PDF version

Reference: Telecom Notice of Consultation 2015-224

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Tariff application and intercarrier agreement approval processes

*The Commission **approves** a number of initiatives to further streamline and/or harmonize its tariff application and intercarrier agreement approval processes. These initiatives include forbearing from the approval of additional types of applications, and harmonizing timelines for greater consistency.*

The initiatives approved in this decision will increase the efficiency of the Commission's approval processes, provide greater clarity to the industry, and ensure that the Commission's tariff application and intercarrier agreement approval processes remain as minimally intrusive and as minimally onerous as possible. In addition, these changes do not impair the Commission's ability to deliver on its public interest obligations entrusted by Parliament to the benefit of all Canadians.

Telecom Notice of Consultation 2015-224 proceeding

1. In Telecom Notice of Consultation 2015-224 (the notice), the Commission identified a number of areas where, in its view, further streamlining and/or harmonization of its tariff application and intercarrier agreement approval processes could be achieved.¹ The Commission called for comments on the streamlining proposals set out in the notice,² and invited parties to submit their own proposals.
2. The Commission's proposals were intended to increase efficiency and provide greater clarity and consistency to the telecommunications industry, which will also benefit all Canadians. They were also intended to ensure that the Commission's processes remain consistent with the Policy Direction,³ which specifies, in part, that the Commission should only use tariff approval mechanisms that are as minimally intrusive and as minimally onerous as possible, and that it should continue to explore and implement new approaches for streamlining its processes.

¹ Telecom Information Bulletin 2010-455 summarizes the various processes and timelines that currently apply to tariff applications and intercarrier agreements, and specifies the existing criteria for each type of application.

² The Commission's preliminary views on the proposed changes to its approval processes for tariff applications and intercarrier agreements are detailed in paragraphs 6 to 23 of Telecom Notice of Consultation 2015-224.

³ *Order Issuing a Direction to the CRTC on Implementing the Canadian Telecommunications Policy Objectives*, P.C. 2006-1534, 14 December 2006

3. The Commission received interventions from Bell Canada, on behalf of itself, Bell Aliant Regional Communications, Limited Partnership, Northwestel Inc., and Télébec, Limited Partnership (collectively, Bell Canada et al.); the Canadian Independent Telephone Company Joint Task Force (JTF); the Canadian Network Operators Consortium Inc. (CNOC); MTS Inc. and Allstream Inc. (collectively, MTS Allstream); Saskatchewan Telecommunications (SaskTel); Shaw Communications Inc. (Shaw); Rogers Communications Partnership (RCP); TekSavvy Solutions Inc. (TekSavvy); and TELUS Communications Company (TCC).
4. The public record of this proceeding, which closed on 10 July 2015, is available on the Commission's website at www.crtc.gc.ca or by using the file number provided above.

Proposed changes and determinations

5. Each of the Commission's proposals set out in the notice, as well as the proposals put forward by parties to the proceeding, together with the Commission's analysis and determinations regarding these proposals, is addressed in this decision under the following topics:
 - Criteria for Group A applications
 - Streamlined orders for Group B applications
 - Quarterly agreement reports
 - Intercarrier agreements and PIC/CARE [Primary Interexchange Carrier/Customer Account Record Exchange] handbooks
 - Non-standard BLIF [Basic Listing Interchange File] agreements and PIC/CARE handbooks
 - 9-1-1 agreements
 - MRS and IP Relay service agreements
 - IP Interconnection Architecture agreements
 - Forbearance
 - Harmonization of timelines
 - Interim approval
 - Intervention timelines for Group B retail filings and intercarrier agreements
 - Intervention timelines for destandardization/withdrawal applications

- Changes proposed by the parties
 - Filing of tariff pages
 - Filing of proposed changes to a tariff as a complete item, rather than by individual pages
 - Tariff notice summary descriptions
 - Links to all local exchange carrier (LEC) tariff websites on the Commission's website
 - Requirement to issue revised tariff pages after approval
 - Use of business days to specify intervals of less than a week
 - Inclusion of wholesale service tariff applications in the Group B category
 - Publication of an information bulletin containing all tariff and intercarrier agreement processes

Criteria for Group A applications

6. The Commission proposed to expand the criteria for Group A applications,⁴ thereby forbearing, pursuant to section 34 of the *Telecommunications Act* (the Act), from the approval of the following additional routine tariff applications:
 - the following housekeeping changes, in incumbent local exchange carrier (ILEC) wholesale tariffs and the tariffs of competitive local exchange carriers (CLECs), as applicable:
 - corrections of typographical errors or administrative errors on approved tariff pages;
 - updates to approved tariff pages to correct cross-references or to remove an expired promotion or special facilities tariff; and
 - updates to approved tariff pages to reflect changes to corporate or service names or titles;
 - updates to CLEC tariffs that are consistent with the most current version of the CLEC Model Tariff found in the CRTC Interconnection Steering Committee (CISC) section of the Commission's website;

⁴ Group A applications are forborne from approval if they meet certain criteria. See paragraphs 2 to 5 of Telecom Information Bulletin 2010-455 for the existing criteria.

- updates to any tariff to reflect numbering plan area code changes;
 - revisions to tariff pages in any tariff that do not include any changes to rates, terms, or conditions of a service or feature; and
 - revisions to tables of contents, indexes, and check pages (a list of pages and revisions in the tariff) in any tariff, if filed independently of other tariff changes.
7. Parties to the proceeding generally agreed with this proposal, though certain parties raised specific issues.
 8. TCC submitted that changes to a CLEC tariff that reflect the CLEC's expansion to a province or an ILEC territory not previously served, such as the addition of rates for a particular province or ILEC territory, should not be forborne from approval and should be treated as Group B applications. TCC viewed such changes as material. It submitted that other LECs, interexchange carriers (IXCs), and wireless service providers, as potential customers or interconnectors, should have the right to be informed of such changes before they take effect and the opportunity to comment.
 9. TCC also submitted that the CLEC Model Tariff includes services that are not mandatory offerings for all CLECs or that may not apply in all ILEC territories. In TCC's view, tariff amendments that are made to offer or withdraw an optional service, or that change the list of ILEC territories where a particular CLEC will apply charges, are also material changes that require notification and an opportunity to intervene prior to the effective date. TCC submitted that, as a result, such changes should continue to be treated as Group B applications.
 10. TekSavvy recommended that the reference to ILEC wholesale tariffs and CLEC tariffs be abridged to simply "wholesale tariffs." It also proposed that the Commission issue a streamlined order to make each Group A filing effective, similar to the proposed process for Group B applications. TekSavvy suggested that this would alleviate confusion by creating a "push notification" to inform less-frequent regulatory participants about the change.
 11. Bell Canada et al. and MTS Allstream disagreed with TekSavvy's proposal to issue streamlined orders for Group A applications. Bell Canada et al. submitted that the current Group A process works well because of its simplicity. MTS Allstream submitted that parties have the option to review the Telecom Applications Report on the Commission's website, making TekSavvy's proposal unnecessary.

Commission's analysis and determinations

12. With respect to TCC's concern about CLEC expansion to areas not previously served, information is available on the Commission's website concerning (i) CLECs' proposals to enter new exchanges, and (ii) confirmation from CLECs that they have

met the required obligations. Therefore, parties have the opportunity to remain informed about CLEC expansion into new territories.⁵

13. In addition, the CLEC Model Tariff and the rates referenced therein, which are available to CLECs to add to their CLEC tariffs when they enter new territories, have been previously approved by the Commission. Therefore, it is unlikely that any updates in line with the model would be disputed or require further review by the Commission. The Commission may exercise remedial power over tariffs that do not meet the conditions of forbearance, should a party raise concerns about a Group A application.
14. Regarding TCC's concern about tariff amendments in which an optional service will be offered or withdrawn, if the CLEC files an Access Services Tariff that includes the relevant sections from the CLEC Model Tariff as part of meeting its obligations for its CLEC category,⁶ it should be able to file the tariff as a Group A application. In such cases, the proposed revisions would be consistent with both the CLEC obligations and the Model Tariff, both of which have already been approved by the Commission. In cases where CLECs propose revisions that are not consistent with their obligations or the Model Tariff, such revisions are to be included in a Group B application, with supporting rationale and evidence justifying the deviation. If a CLEC proposes to destandardize or withdraw a service from its existing tariff, the application is to be filed as a destandardization/withdrawal application.⁷
15. TekSavvy's proposal would simplify the terminology while still capturing the same range of applications envisioned in the notice. Accordingly, all ILEC wholesale tariffs and CLEC tariffs will be referred to as wholesale services tariffs in the context of Group A applications.
16. However, it would be inconsistent with forbearance for the Commission to issue orders – streamlined or otherwise – to make each Group A filing effective since, in the circumstances, forbearance entails the Commission refraining from approving these applications.
17. Accordingly, the Commission **approves** the proposed expansion to the criteria for Group A applications as set out in the notice with one change, that change being the reference to wholesale services tariffs as discussed in paragraph 15 above.

⁵ In Telecom Decision 2012-396, the Commission updated the notification requirements for CLECs seeking to offer local services in new exchanges.

⁶ There are four categories of CLECs. Details on each of these categories can be found on the Commission's website at the following link: <http://www.crtc.gc.ca/eng/8180/8180m.htm>.

⁷ Telecom Information Bulletin 2010-455 sets out the Commission's procedures for dealing with applications to destandardize and/or withdraw tariffed services. This bulletin summarizes, among other things, the Commission's related determinations set out in Telecom Decision 2008-22 and is incorporated by reference in section 59 of the *Canadian Radio-television and Telecommunications Commission Rules of Practice and Procedure*.

18. Currently, Group A tariff applications are forborne from approval conditional on

- the tariff filing qualifying as a Group A tariff filing, as defined;
- the applicant filing the revised tariff with the Commission, on or before the effective date, for the public record; and
- the applicant certifying in writing to the Commission, on or before the effective date, for the public record, that the tariff filing complies with the definition of Group A tariff filings.

19. It would be appropriate to maintain these conditions for the expanded Group A criteria.

Streamlined orders for Group B applications

20. Currently, some Group B applications⁸ are disposed of by way of orders and others are not.⁹ The Commission proposed to issue streamlined orders, as a general practice, for all approved Group B applications. This proposal would make streamlined orders the default method of approval for such applications. More detailed, non-streamlined orders would generally continue to be issued in cases where interventions are received, or where the Commission approves an application in part, approves with changes, or denies the entire application.

21. Most parties to the proceeding agreed with the proposal. However, some expressed concern about potential delays that could result from such a change.

22. Bell Canada et al. submitted that the current approval process has not been problematic and that parties could find information about Group B applications on the Commission's website. They expressed concern that issuing streamlined orders for all Group B applications could result in delays in implementing service changes in a timely manner, which could be harmful to their business in the current competitive marketplace. Although they opposed making streamlined orders the default process for all Group B applications, Bell Canada et al. submitted that, if the Commission decided to do so, a process should be implemented to ensure that there would be no delays in obtaining interim approval for Group B applications.

⁸ See paragraphs 6 and 7 of Telecom Information Bulletin 2010-455 for the existing criteria for, and examples of, Group B applications.

⁹ Currently, in cases where an application is approved, where no interventions are filed, and where there is no correspondence on file between Commission staff and the applicant, a note is added to the company's tariff page on the Commission's website to indicate the date of interim and final approval, without an order being issued.

23. TCC agreed with the proposed approach, but only if interim approval for such tariff notices would take effect 15 calendar days after filing and if final approval would be automatic after 37 calendar days.¹⁰ Otherwise, TCC agreed with Bell Canada et al. that the advantages of consistency might be outweighed by the delay to the effective date of the proposed tariff changes.
24. Shaw suggested that the Commission should issue streamlined orders if all interventions received on a particular tariff application are supportive of the application.

Commission's analysis and determinations

25. Regarding Bell Canada et al.'s and TCC's concerns about potential delays in receiving interim approval if the default Group B approval process included issuing streamlined orders, the implementation of the Commission's proposal would not change the time frames currently associated with the interim approval of Group B applications. Rather, it would only change the mechanism by which a Commission decision would be communicated to the public.
26. In other words, interim approval of these applications would continue to take effect on the 15th calendar day after they are filed, unless Commission staff issues a letter or interrogatories prior to the 15th calendar day indicating otherwise, as is currently the case.
27. The only change in the process would be that a streamlined order would be issued rather than a note being posted on the Commission's website to confirm approval of the application. This would apply to both interim and final approval of Group B applications – that is, if no interventions are received, the proposed tariff revisions would be approved on a final basis after the intervention and reply period has passed unless a Commission staff letter, or a Commission order or decision is issued indicating otherwise.
28. With regard to Shaw's proposal, it would be appropriate to issue streamlined orders for Group B applications in cases where the interventions are wholly supportive of the change. In such cases, there would be no issues requiring written analysis and the simplified process would benefit both the Commission and the applicant.
29. Based on the above, the Commission **approves** the proposal to issue streamlined orders for all Group B applications, unless opposing interventions are received, or in cases where the Commission either approves an application in part or denies the entire application. The Commission also **approves** Shaw's proposal that the Commission issue streamlined orders if the interventions received on a particular tariff application are wholly supportive of that application.

¹⁰ Currently, if no interventions are received, the proposed Group B tariff revisions are approved on a final basis 7 calendar days after the intervention period of 25 calendar days has passed, that is, after 32 calendar days, unless a Commission staff letter or a Commission order or decision is issued indicating otherwise.

Quarterly agreement reports

30. The Commission proposed that LECs no longer be required to file LEC-IXC and master agreement for local interconnection (MALI) quarterly reports.¹¹
31. While most parties supported this proposal, TekSavvy submitted that transparency is enhanced when market participants report on which agreements they have entered into. It submitted that, for this reason, the Commission should continue to require quarterly reports to be filed.
32. TCC requested that, for certainty, and pursuant to Telecom Decision 2011-574, the Commission should clarify that Special MALIs are currently forborne to the same extent as MALIs.¹²

Commission's analysis and determinations

33. Eliminating the condition of forbearance set out in Telecom Decision 2007-129 that requires existing LECs to file quarterly reports on standard-form MALIs and LEC-IXC agreements that they have entered into in the previous quarter would be more efficient for both LECs and the Commission.
34. The amount of information contained in these reports is minimal. Parties will still have access to pertinent information on the Commission's website regarding the activities of existing and proposed CLECs, such as the list of Schedule Cs to MALIs that have been filed and information about proposed CLECs' service introduction plans and existing CLECs' expansion plans. The minimal additional information that would be available as a result of maintaining the requirement to file quarterly reports is outweighed by the administrative burden caused by the filing requirement.
35. Accordingly, the Commission affirms its previous decision to forbear under section 29 of the Act from requiring the filing and approval of standard-form MALIs and LEC-IXC agreements. Further, effective the date of this decision, the Commission is removing the condition of forbearance that requires existing LECs to file quarterly reports on standard-form MALIs and LEC-IXC agreements that they have entered into in the previous quarter.
36. Regarding Special MALIs, in Telecom Decision 2011-574, the Commission expressed the view that, like the MALI, the Special MALI is an agreement that falls within the scope of section 29 of the Act. The Commission determined that requirements for the execution and filing of a MALI can be satisfied through the execution and filing of a Special MALI in circumstances where a Special MALI is appropriate. As a result, in such circumstances, Special MALIs are equivalent to

¹¹ Existing LECs entering into standard-form LEC-IXC agreements or MALIs are currently required, as a condition of the Commission's forbearance from approving such agreements, to report to the Commission on a quarterly basis the name of the parties to and the date of execution of such agreements.

¹² The Special MALI is a MALI that takes into consideration the relationship between two LECs in cases where one or both of those LECs obtains access to the public switched telephone network via another party.

MALIs. Therefore, the conditional forbearance from filing and approval that applies to standard-form MALIs, as modified in the present decision, also applies to standard-form Special MALIs.

37. Prospective CLECs are reminded that they must still file their letters of attestation with the Commission, which must attest to the existence of, and the parties to, such agreements.

Intercarrier agreements and PIC/CARE handbooks

38. In the notice, the Commission indicated that various intercarrier agreements and handbooks¹³ are based on standard templates. The Commission proposed that approval no longer be required for these types of agreements and handbooks. However, it proposed that, as a condition of forbearance, LECs would still be required to file these agreements and handbooks within seven business days of their execution or adoption, as the case may be.
39. While many parties agreed with the proposal, RCP submitted that these agreements and handbooks no longer needed to be filed for Commission approval since they are based on standard template documents, similar to LEC-IXC agreements and MALIs, which were forborne under Telecom Decision 2007-129. TekSavvy proposed that the Commission forbear from the filing of standard-form agreements, and require only that parties report information about which standard-form agreements they have entered into.
40. TCC replied that TekSavvy's proposal would not create any meaningful time savings for either the Commission or carriers. However, TCC suggested that parties should clearly identify in their cover letter whether an agreement or a form follows a previously-approved template, in which case neither the Commission nor interested parties would need to review the content of the agreement.
41. RCP submitted that although there is no regulatory obligation to file Internet Protocol (IP) interconnection agreements, as a practical matter, IP Interconnection Architecture documents, which it described as equivalent to the Schedule C to a MALI, must be filed in order to obtain an agreement number.¹⁴ MTS Allstream agreed that the Commission should clarify this requirement.

¹³ In that context, the Commission referred to the following types of agreements and handbooks: Basic Listing Interchange File (BLIF) agreements, which cover the supply of subscriber directory listings by CLECs to other LECs in exchanges in which the proposed CLEC plans to offer service; 9-1-1 agreements; message relay service (MRS) and Internet Protocol (IP) Relay service agreements, which cover services used by customers with hearing or speech impairment; and PIC/CARE handbooks, which set out the guidelines for the exchange of information between a LEC and long distance service providers.

¹⁴ Telecom Decision 2012-396 requires that existing CLECs expanding into a new exchange identify the agreement number(s) of the approved Schedule C(s), along with the relevant appendix, entered into with the other LECs offering local services in the exchange.

42. MTS Allstream and TCC proposed that the interval for filing the required agreements and handbooks be changed from 7 business days to 10 calendar days.

Commission's analysis and determinations

43. CISC has developed templates for BLIF agreements, PIC/CARE handbooks, LEC-IXC agreements, and MALIs. These templates are all available on the CISC section of the Commission's website. For consistency, it would be appropriate to treat all of these documents in the same way – that is, not only should the Commission forbear from approving standard-form versions of BLIF agreements and PIC/CARE handbooks, but it should not require that they be submitted, as originally proposed.

44. Currently, as set out in Telecom Decision 2007-129, LECs are required to file the following agreements, which are deemed to be approved upon filing:

- any LEC-IXC agreements and MALIs that depart from the associated template;
- Schedule Cs to MALIs;
- Carrier Services Group agreements; and
- transiting agreements in cases where not all services being used are provided pursuant to the approved tariffs of the LEC in question.

45. Given that the Commission has forborne from the approval of such agreements under section 29 of the Act, it is not necessary that they be deemed to be approved upon filing; however, the condition that they be filed for information remains. Because the Commission has not forborne from subsections 27(2), (3), and (4) of the Act, the Commission will continue to have jurisdiction to address allegations of unjust discrimination or undue preference in the provision of service pursuant to such agreements.

46. Regarding TekSavvy's proposal that parties be required to report information about which standard-form agreements they have entered into, existing CLECs would already have such agreements in place and information about the agreements would be included in letters CLECs file with the Commission as part of their CLEC obligations.

47. Although CLECs have been required to specify agreement numbers as part of meeting their CLEC obligations in the past, there now may be cases where agreement numbers are no longer available. In such cases, CLECs should instead identify the type of agreement and the date on which it was signed, as well as the name of the other party to the agreement.

48. Additional considerations and determinations regarding non-standard versions of these documents, as well as other types of agreements, follow below.

Non-standard BLIF agreements and PIC/CARE handbooks

49. For the sake of consistency, it is appropriate to adopt, with respect to BLIF agreements and PIC/CARE handbooks that deviate from the standard-form template, the approach set out in paragraph 45 above – that is, to forbear from approval under section 29 of the Act on the condition that they be filed for information. The Commission retains its powers under subsections 27(2), (3), and (4) of the Act in respect of the telecommunications services provided pursuant to such agreements to ensure that there is no unjust discrimination or undue preference in the provision of a service.

9-1-1 agreements

50. A 9-1-1 agreement with the ILEC is obligatory when 9-1-1 service is provided to CLECs or wireless carriers through the ILEC. While there is no existing generic template for such 9-1-1 agreements, in cases where the new 9-1-1 agreement is consistent with the most recently approved version for the ILEC in question, the new agreement would not have to be filed for approval. However, the existence of the agreement should continue to be referenced in CLEC notification letters.

51. If a new 9-1-1 agreement is not consistent with the most recently approved version for the ILEC in question, the 9-1-1 agreement is to be filed for Commission approval.

52. In cases where a 9-1-1 agreement has not previously been approved for a small ILEC, the first agreement must be filed for approval to allow an opportunity for other parties to intervene and to establish a precedent agreement for that small ILEC. However, in such circumstances, the small ILEC may submit for approval an agreement that is consistent with the most recently approved agreement for an ILEC in an adjacent territory.

MRS and IP Relay service agreements

53. Similarly, there are no generic MRS or IP Relay service agreements. As a result, if an ILEC enters into an agreement that is consistent with the most recently approved agreement for that same ILEC, the new agreement should be forborne from approval and should not need to be filed with the Commission or reported. If a small ILEC without a previously approved MRS or IP Relay service agreement signs such an agreement that is consistent with the most recently approved agreement for another ILEC in an adjacent territory, there is no need for the small ILEC to seek approval or file the agreement.

54. For any agreement that is not consistent with an approved agreement as described, the Commission forbears from approval under section 29 of the Act on the condition that the agreement be filed for information. The Commission retains its powers to ensure that there is no unjust discrimination or undue preference in the provision of a service pursuant to any such agreement.

IP Interconnection Architecture agreements

55. Regarding RCP's and MTS Allstream's comments about the filing of IP Interconnection Architecture documents, in Telecom Regulatory Policy 2012-24, the Commission decided, among other things, to forbear from the exercise of its powers under sections 25, 29, and 31, and subsections 27(1), (5), and (6) of the Act, with respect to IP and time-division multiplexing voice network interconnection services provided pursuant to negotiated arrangements. However, the Commission clarified, in Telecom Decision 2012-396, that the forbearance determination in Telecom Regulatory Policy 2012-24 does not apply to Schedule C to a MALI.
56. The information contained in IP local Interconnection Architecture documents is analogous to that contained in Schedule C to a MALI. By way of clarification, carriers are to treat these documents in the same way as Schedule Cs and to file them for information with the Commission.

Forbearance

57. The Commission will extend forbearance, as described above, to refrain from approval of those intercarrier agreements or handbooks that follow standard Commission-approved templates or, in the case of 9-1-1, MRS, and IP Relay service agreements, the most recently approved Commission agreement for the relevant ILEC; or, in the case of small ILECs for MRS and IP Relay service agreements, the most recently approved agreement for another ILEC in an adjacent territory. Such documents do not need to be filed with the Commission upon execution, but must be referenced in CLEC expansion notification letters to the Commission, as appropriate.
58. In cases where the agreements or handbooks in question – with the exception of 9-1-1 agreements – deviate from previously approved Commission templates or decisions, the Commission forbears from approval, on the condition that the LEC files the agreement for information. The Commission retains its powers to ensure that there is no unjust discrimination or undue preference in the provision of services pursuant to such agreements or handbooks.
59. The interval for filing any agreements and handbooks that are not consistent with the associated template or approved agreement will change from 7 business days to 10 calendar days, for consistency with the other proposals in the way timelines are calculated.
60. Any 9-1-1 agreements not consistent with the most recently approved version for the ILEC in question must be filed for Commission approval. In addition, a small ILEC without a previously approved 9-1-1 agreement must file its first 9-1-1 agreement for Commission approval, although it may submit for approval a 9-1-1 agreement that is consistent with the most recently approved such agreement for an ILEC in an adjacent territory.

61. Further, the Commission will impose a condition of forbearance that LECs be required to file for information any of the agreements or handbooks subject to this decision that the LECs are not otherwise required to file upon the Commission's request. This will ensure that the Commission is able to give effect to the powers it has retained to address allegations of undue preference and unjust discrimination.
62. To conclude, the following are to be filed for information within 10 calendar days of execution: any LEC-IXC agreements and MALIs that depart from the associated template, Schedule Cs to MALIs, IP local Interconnection Architecture documents, Carrier Services Group agreements, and transiting agreements in cases where not all services being used are provided pursuant to the tariffs of the LEC in question.

Harmonization of timelines

Interim approval

63. The Commission proposed to harmonize the timelines for interim approval (or the issuance of a Commission staff letter) to 15 calendar days from the date of the application for Group B applications, intercarrier agreements requiring approval, and destandardization/withdrawal applications. A change from business days, which are currently used to calculate timelines for certain types of applications, to calendar days would be consistent with subsection 12(2) of the *Canadian Radio-television and Telecommunications Commission Rules of Practice and Procedure* (the Rules of Procedure), which stipulates that a time period set out in the Rules of Procedure is to be computed in calendar days.
64. All parties that commented agreed with the Commission's proposal to harmonize the timelines for interim approval (or the issuance of a Commission staff letter) for Group B applications and intercarrier agreements.
65. However, CNOC submitted that 15 calendar days is not enough time for interested parties to gather evidence and produce a proper intervention in opposition to the interim approval of a destandardization/withdrawal application. In CNOC's view, this could lead to the disruption of competitive markets. CNOC submitted that once a tariffed service is destandardized or withdrawn on an interim basis, it is very difficult to reverse the effects of that determination. Therefore, CNOC requested that the Commission issue a directive to defer interim approval of any destandardization and/or withdrawal application for a service with an active customer base until the deadline for filing interventions has expired and the Commission has conducted a preliminary review of the record. TekSavvy questioned whether interim destandardization is appropriate at all.
66. MTS Allstream, SaskTel, and TCC disagreed with CNOC's position. They suggested that 15 calendar days is enough time for a party to indicate its concerns and that further comments would be filed.

Commission's analysis and determinations

67. The Commission's current procedures regarding destandardization/withdrawal applications state that in cases where there are no customers for a particular service, the Commission intends to grant interim approval within 10 business days of a complete application being filed. Since no customers would be affected by the application, it would be appropriate to maintain the intent to grant interim approval but change the intended interim approval timeline to 15 calendar days.
68. How the Commission decides to exercise its discretion in determining whether or not it is appropriate to grant interim approval depends on the facts of a given case. In the case of retail service destandardization/withdrawal applications, if there are customers for a service, the Commission has not generally considered it appropriate to grant interim approval.
69. In the case of applications related to wholesale services tariffs, if there are customers for a service, the timelines associated with destandardization and withdrawal applications are generally followed, and if interim approval is granted, this is generally done only after the comment period has closed and interested parties have had the opportunity to comment.¹⁵ The present proposal does not change this general approach.
70. Accordingly, the Commission **approves** the harmonization of timelines for interim approval (or the issuance of a Commission staff letter) to 15 calendar days for Group B applications, intercarrier agreements, and destandardization/withdrawal applications.

Intervention timelines for Group B retail filings and intercarrier agreements

71. The Commission proposed to harmonize the deadlines for filing interventions related to Group B applications and intercarrier agreements to 30 calendar days from the date on which the application is filed, with applicants allowed a further 10 calendar days for filing a reply. The revised timelines would align with those that currently apply to competitor tariff applications and Part 1 applications.¹⁶ In the case of Part 1 applications, the time period is determined starting from the date on which the application is posted on the Commission's website, while the time period for tariff applications and intercarrier agreements is determined starting from the filing date.
72. All parties that commented agreed with this proposal. Bell Canada et al. agreed, subject to the same deadlines also applying to *ex parte* applications.

¹⁵ Some applications related to third-party Internet access (TPIA) service have been granted interim approval before the end of the comment period in cases where there are customers for the service and where the replacement service is a speed upgrade at the same rate as the destandardized service.

¹⁶ Section 12 of the Rules of Procedure addresses exceptions to the general rule concerning computation of a time period – for example, no time is deemed to pass during the period beginning on 21 December in a given year and ending on 7 January in the following year.

Commission's analysis and determinations

73. For consistency, it would be appropriate to apply the same revised deadlines to *ex parte* Group B applications as to standard Group B applications. Parties are reminded that, in the case of *ex parte* applications, the intervention period begins once the application is placed on the public record, i.e. once the application is posted on the Commission's website.
74. The Commission **approves** the harmonization of intervention timelines for Group B retail applications, including *ex parte* applications, and intercarrier agreements to 30 calendar days for interventions and a further 10 calendar days for replies.

Intervention timelines for destandardization/withdrawal applications

75. The Commission proposed to modify the deadlines for filing interventions concerning destandardization and/or withdrawal applications from 30 business days to 45 calendar days from the date on which the application is filed, with applicants allowed a further 10 calendar days for filing a reply, rather than 10 business days. The JTF, RCP, SaskTel, and Shaw agreed with the Commission's proposal.
76. Bell Canada et al. submitted that the proposal would give interveners a slightly longer period of time to submit comments and applicants a slightly shorter period of time to reply. They submitted that there were no issues with the current timelines and that, therefore, no change to the deadlines was required.
77. MTS Allstream noted that destandardization/withdrawal applications are to be filed at least 45 business days in advance of the proposed effective date. They proposed that this interval also be converted to calendar days for consistency. SaskTel agreed with this proposal.
78. TCC submitted that the 10 calendar days proposed by the Commission would usually be long enough for applicants to reply to interventions. However, on those occasions when additional time is required, the Commission could grant an extension. TCC proposed, alternatively, that the 10 calendar days proposed by the Commission could be changed to 15 calendar days for destandardization/withdrawal applications. It submitted that an inconsistency in the type of day is more likely to be misperceived as an error than an inconsistency in the reply deadline.
79. TCC also proposed that, in cases where there are no customers, the deadline for interventions be set at 30 calendar days rather than 45 calendar days. In its view, because there are no customers to notify, there is no reason that such applications cannot be managed on the timeline associated with Group B tariff applications. MTS Allstream agreed with this proposal.
80. Finally, TCC proposed, for consistency, that in cases where comments are received, intended final determination timelines be expressed as 90 calendar days instead of 65 business days, and that, in cases where there are no customers, timelines be

expressed as 60 calendar days instead of 45 business days. TekSavvy agreed with this proposal.

81. TCC requested that the applicant be given five additional calendar days to send notification to any remaining customers rather than being required to send the notification on the date of application for a service destandardization/withdrawal. It submitted that an additional five-day period (i) would be administratively easier to manage, and (ii) with the extended period for interventions that the Commission has proposed, should still allow sufficient time for customer interventions.
82. TCC also proposed that the Commission permit customer notification by email in cases where the customer has specifically indicated a preference to receive correspondence by email instead of by letter.
83. TekSavvy suggested that any abridgement of timelines be carefully considered, and that unless there is a specific finding that too much time is being given, an equivalent calendar day period should be identified.

Commission's analysis and determinations

84. The Commission's goal, in proposing to harmonize timelines, was to align intervention and reply periods as much as possible among different types of applications to provide greater consistency and remove uncertainty. The exception was the proposed timeline for destandardization/withdrawal applications.
85. In Telecom Circular 2005-7, the Commission found that interested parties should be allowed 45 calendar days to comment on an applicant's destandardization and/or withdrawal application, in recognition of the fact that customers affected by these types of applications often live in remote areas. This time period was later changed to 30 business days in Telecom Decision 2008-22.
86. The proposal to move from 30 business days back to 45 calendar days would give interveners a slightly longer period of time to submit comments, and the proposed change from 10 business days to 10 calendar days would give applicants a slightly shorter period of time to reply. However, in cases where there are no customers, the Commission intends to grant interim approval, within 15 calendar days as indicated above, which benefits the applicant. In addition, while 10 calendar days is generally slightly shorter than 10 business days for applicants to reply, it is consistent with the reply period for other types of applications. As a result, 10 calendar days should provide sufficient time for reply for these types of applications.
87. While the Commission could set the intervention deadline at 30 calendar days in cases where there are no customers, this exception would introduce an additional set of timelines and complexity to the Commission's processes for destandardization/withdrawal applications, which is inconsistent with the goals of this proceeding.

88. For consistency with other proposals to change from business days to calendar days, in the case of destandardization/withdrawal applications, it would be appropriate for

- applications to be filed at least 60 calendar days in advance of the proposed effective date, which is approximately the same time frame as 45 business days;
- timelines associated with requests for information to be expressed as 21 calendar days instead of 15 business days; and timelines associated with responses to requests for information to be expressed as 7 to 15 calendar days instead of 5 to 10 business days; and
- intended final determination timelines to be expressed as 90 calendar days instead of 65 business days in cases where comments are received, and 60 calendar days instead of 45 business days in cases where there are no customers.¹⁷

89. Similarly, for consistency, it would be appropriate for timelines associated with intended final determinations for intercarrier agreements requiring Commission approval to also be expressed as within 60 calendar days instead of 45 business days.

90. Giving applicants five calendar days to send notification to any remaining customers instead of requiring them to notify customers on the date of application would reduce the amount of time customers would have to prepare and submit comments. As a result, it would not be appropriate to approve this proposal.

91. However, the Commission finds it reasonable to clarify that carriers may notify customers by email in cases where the customer has indicated a preference to receive correspondence by email instead of post mail. This change would be efficient both for customers who have indicated such a preference, and for the carrier in question.

92. Based on the above, for destandardization/withdrawal applications the Commission **approves**

- the requirement for applications to be filed at least 60 calendar days in advance of the proposed effective date;
- the harmonization of intervention timelines to 45 calendar days for interventions and a further 10 calendar days for reply;
- changing timelines associated with requests for information to 21 calendar days, and timelines associated with responses to requests for information to 7 to 15 calendar days;

¹⁷ The adoption of this intention, expressed in calendar days for the sake of consistency, will not affect the Commission's continued adherence to section 26 of the Act. This section requires the Commission to approve a tariff with or without changes, disallow a tariff, or make public reasons why it has not done so, within 45 business days after the tariff has been filed.

- changing intended final determination timelines to 90 calendar days in cases where comments are received and to 60 calendar days in cases where there are no customers; and
 - giving applicants the option to provide customer notification by email, in cases where the customer has indicated a preference to receive correspondence by email.
93. The Commission expects that carriers, in order to be consistent with the approach to service set out in the Rules of Procedure, retain proof of sending and receipt in the case of notification by email.
94. The Commission also **approves** changing timelines associated with intended final determinations for intercarrier agreements to 60 calendar days.

Changes proposed by the parties

Filing of tariff pages

95. Currently, applicants must file both existing and revised tariff pages for Group A applications, and Telecom Decision 2008-74 requires small ILECs and Northwestel to file existing and revised tariff pages with the Commission when they submit Group B applications. For all other types of applications, only the proposed tariff pages must be filed.
96. SaskTel proposed to standardize the content required for tariff applications – by either including the existing tariff pages with all types of applications or not including the existing tariff pages with Group A filings – to create consistency across all types of applications. MTS Allstream supported SaskTel’s proposal.
97. TCC agreed that filing existing tariff pages was a reasonable requirement for Group A applications, which may be effective on the date of filing. However, it noted that in the case of Group B applications, for which the Commission has 15 days to issue a letter or requests for information if required, the additional burden of filing existing tariff pages is not justified by the need for expedience. It added that if all company tariffs were available online, there would be no reason to include the existing tariff pages even for Group A applications, since the entire existing tariff would be easily accessible.

Commission’s analysis and determinations

98. Standardizing the filing requirements for tariff applications would increase consistency across all types of tariff applications. Filing existing tariff pages with Group A applications allows for simpler confirmation of Group A eligibility and verification of proposed changes as necessary, since not all companies have their tariffs online and because existing tariff pages are superseded by approved pages for those companies that do post tariffs on their websites.

99. Since tariffs may not be posted online, or not all may be current, delays can result when reviewing a tariff application. As a result, a requirement for existing tariff pages to be submitted by all applicants with Group B applications would increase efficiency and streamline the Commission's processes.
100. In addition, all companies are encouraged, going forward, to post their retail tariffs online and keep them current. The Commission has previously directed all LECs that maintain websites to make their Access Services Tariffs available online.¹⁸
101. In a similar vein, some companies submit confidential versions of their applications that do not contain all of the information included in the abridged versions. This can cause confusion during review of the applications. Confidential versions should include all information on all applicable tariff pages and abridged versions should mirror the confidential versions, except that confidential information is redacted.
102. Accordingly, the Commission **directs** all companies to file existing tariff pages when submitting any tariff application, and encourages them to post their retail tariffs online and keep them current. In addition, the Commission expects applicants filing information in confidence to file complete versions of both the confidential and abridged tariff pages for which they are requesting approval.

Filing of proposed changes to a tariff as a complete item, rather than by individual pages

103. SaskTel recommended filing proposed changes to a tariff as a complete tariff item, rather than by individual pages. It submitted that, currently, for all filing types, only the pages with proposed changes are filed with the Commission, which creates an administrative burden for SaskTel since the company stores all pages of a tariff item in one electronic file. SaskTel stated that all page changes are identified in the letter accompanying the changes and are clearly identified in the footer of every page. Therefore, in SaskTel's view, it would not create a burden for the reviewer if the applicant were to include pages that are not undergoing changes in the submission.
104. Bell Canada et al. disagreed with SaskTel's proposal, noting that separate individual pages of tariff items may undergo different changes at different times, or in parallel through separate processes. In their view, it would be far simpler to continue to file only those pages affected by changes. However, Bell Canada et al. did not object to providers having the flexibility to submit complete tariff items instead of individual pages, as long as the changes are clearly indicated in both a covering letter and the document itself.
105. MTS Allstream noted that there are cases, such as for filings under the price cap framework, where hundreds of pages, rather than a handful of pages, would need to be filed under SaskTel's proposal. Like Bell Canada et al., MTS Allstream suggested that applicants be given the option to file either entire tariff items or individual pages.

¹⁸ See Telecom Decision 2011-92.

TCC did not object to LECs being able to file additional pages for which no changes are proposed.

Commission's analysis and determinations

106. It would be cumbersome for Commission staff to receive a large number of unchanged tariff pages that are not necessary for review of the application. While SaskTel stores all pages of a tariff item in one electronic file, other companies do not object to the current process. As Bell Canada et al. noted, separate pages of a tariff item may be included in separate processes, and requiring all tariff pages in the item to be submitted with an application could create confusion. Such a change would decrease efficiency.
107. However, if a company considers that it would be more efficient to submit all pages of a tariff item in one electronic file, it would be reasonable for the Commission to accept the application.
108. Accordingly, the Commission finds that it is appropriate to give applicants the option of submitting complete tariff items instead of individual pages, if they choose, as long as the changes are clearly indicated in both the cover letter and the document itself.

Tariff notice summary descriptions

109. MTS Allstream proposed that more relevant summary descriptions be provided for tariff notices on the Commission's website. They submitted that descriptions such as "various tariff items" or "miscellaneous services" make it difficult (i) for other parties to quickly discern if a filing may be of interest, and (ii) to research previous applications on a given subject. In their view, descriptions such as "other capped services" or "business local voice services" are concise and quickly convey information of great relevance to other parties. MTS Allstream submitted that better descriptions would assist parties in identifying tariff notices that could affect them, better enabling them to consider an intervention or to plan for the impacts of the changes.
110. SaskTel and TekSavvy agreed with MTS Allstream's proposal. TekSavvy also proposed that the Commission add to streamlined orders the names of tariff items being approved so that the public would know the general subject matter to which the streamlined order corresponds.

Commission's analysis and determinations

111. MTS Allstream's proposal that tariff notices use more relevant summary descriptions and TekSavvy's proposal to add to streamlined orders subject names of tariff notices being approved would increase transparency and efficiency for interested parties. The most efficient way to implement this change would be for the applicant to provide a clear and brief description in the subject line of its application – that is, in the range of five to seven words – of the exact service or equipment in question. In cases where there are multiple tariff items, companies could refer to the most significant item and

add “and other items,” which the Commission would use on its website and in any streamlined order that results from the application.

112. Accordingly, the Commission **approves** the proposal to provide a clear and brief description in the subject line of applications of the exact service or equipment in question. The Commission will use these descriptions on its website as more relevant summary descriptions for tariff items and in any streamlined orders that result from such applications. Applicants are to provide a clear and brief description of the subject, as indicated above, **beginning 1 March 2016**.

Links to all LEC tariff websites on the Commission’s website

113. TCC submitted that all tariffs should be easily available online and proposed that the Commission’s Tariff Applications web page have links to all small ILEC and CLEC tariff websites. In cases where a LEC does not maintain a website, TCC proposed that a copy of the LEC’s tariff should be maintained on the Commission’s website.
114. Bell Canada et al. agreed with TCC’s proposal. MTS Allstream agreed that all tariffs should be posted online.

Commission’s analysis and determinations

115. As noted above, all companies are now encouraged to post their retail tariffs online and keep them current, and LECs that maintain websites should have already posted their Access Services Tariffs online.
116. Including links on the Commission’s website to tariffs posted on small ILEC and CLEC websites would benefit consumers and other parties. As a result, it would be appropriate to request that small ILECs and CLECs provide the Commission with links to their tariffs, to the extent their tariffs are posted online. These links, where available, would be included on the Commission’s Tariff Applications web page, along with the pre-existing links to ILECs’ tariff websites.
117. In cases where a LEC does not maintain a website, it would not be feasible to add a copy of the company’s tariff to the Commission’s Tariff Applications web page. Each time a change was made to the tariff, an updated version would have to be posted with the approved change, creating additional administrative work. Accordingly, this proposal should not be undertaken.
118. The Commission requests that small ILECs and CLECs provide it with URL¹⁹ links to their tariffs **by 31 March 2016**, to the extent the tariffs are posted online, so that they may be included on the Commission’s Tariff Applications web page.

¹⁹ URL stands for Uniform Resource Locator.

Requirement to issue revised tariff pages after approval

119. TCC proposed that once tariff changes are approved, companies should not be required to issue revised tariff pages showing the approved content, rather the Commission should direct the carrier to update its online tariff. TCC submitted that the same time period that the Commission would permit for tariff page issuance should be permitted for online tariff updates. The carrier would then provide a formal indication to Commission staff that the change has been made. TCC submitted that a process for indicating on the Tariff Applications web page that the carrier's online tariff has been updated would be beneficial but not crucial.
120. Bell Canada et al. and SaskTel agreed with TCC's proposal for the most part. SaskTel proposed that the online version should not be updated until the effective date of the tariff changes. Bell Canada et al. did not agree that formal notification to the Commission was required when the changes have been made to their websites. Instead, Bell Canada et al. recommended that once they had Commission approval, they would simply update the pages on their websites.
121. MTS Allstream noted that in cases where the tariffs include confidential information, the confidential versions would still need to be issued to the Commission. They submitted that therefore, revised tariff pages should continue to be issued in all cases.
122. TekSavvy disagreed with TCC's proposal, arguing that relying on carriers' websites as part of the tariff process would not be workable.

Commission's analysis and determinations

123. As noted by MTS Allstream, in cases where tariffs include confidential information, the confidential versions of tariff pages would still need to be issued to the Commission. For consistency, revised tariff pages should still be issued following tariff approval in all cases. In addition, as noted previously, not all carriers have posted their tariffs online, which would make this proposal difficult to implement.
124. Accordingly, the Commission **denies** this proposal.
125. Unless otherwise directed, the Commission hereby orders applicants to issue revised tariff pages within 10 days of the interim and/or final approval date of the application.

Use of business days to specify intervals of less than a week

126. MTS Allstream proposed that business days be used to specify intervals of less than a week, and that calendar days be used for intervals of one week or more.
127. TCC submitted that such a change could create uncertainty. It noted that the Commission can amend the normal deadlines as required in consideration of weekends, holidays, and the Commission's usual break in activity during the holiday season. TCC also noted that applicants may identify issues in the default deadlines and propose suitable changes to the schedule.

Commission's analysis and determinations

128. The proposals to harmonize timelines set out in the notice aimed to convert business days to calendar days for greater consistency and to reduce confusion. Specifying intervals of less than a week in business days, and intervals of one week or more as calendar days would not align with the intention of the notice.

129. Accordingly, the Commission **denies** this proposal.

Inclusion of wholesale service tariff applications in the Group B category

130. MTS Allstream suggested that the Group B category should be broadened to include wholesale service tariff applications, other than those that propose destandardization and/or withdrawal, or those that qualify for inclusion in the broadened Group A category. MTS Allstream submitted that doing so would allow wholesale services tariff applications to receive automatic interim approval in 15 calendar days, which would simplify the tariff application and approval framework to three distinct processes – Group A, Group B, and destandardization/withdrawal – rather than four.

Commission's analysis and determinations

131. In the Commission's view, it would not be appropriate to include wholesale services tariff applications in the Group B category, thereby including them in the general practice of granting interim approval by default on the 15th calendar day, absent Commission staff intervention. Wholesale service applications often elicit comments from competitors, while Group B applications do not generally attract comments. Accordingly, MTS Allstream's suggestion is inappropriate, and it is necessary that the Commission have greater flexibility with respect to the interim disposition of wholesale services tariff applications.

132. Accordingly, the Commission **denies** this proposal.

Publication of an information bulletin containing all tariff and intercarrier agreement processes

133. Both the JTF and SaskTel requested that any changes in the Commission's tariff application and intercarrier agreement approval processes resulting from this proceeding be consolidated into a single document. SaskTel also requested that any other requirements regarding tariffs be included in the new document.

134. With the issuance today of Telecom Information Bulletin 2010-455-1, the Commission is providing an update that summarizes all processes related to tariff applications and intercarrier agreements, taking into account its determinations set out in this decision, as well as in underlying decisions and regulatory policies.

Implementation of forbearance decisions

135. Pursuant to subsection 34(1) of the Act, the Commission may make a determination to refrain from exercising certain powers and performing certain duties where it finds that to do so would be consistent with the policy objectives of the Act.
136. The Commission finds, as a question of fact, that to refrain from exercising its powers and performing its duties
- pursuant to subsection 25(1) of the Act with respect to the approval of tariff filings for telecommunications services that meet the expanded Group A criteria, subject to the existing conditions for Group A tariff filings; and
 - pursuant to section 29 of the Act with respect to BLIF, 9-1-1, MRS, and IP Relay service agreements, and PIC/CARE handbooks, to the extent and subject to the conditions described in this decision

would be consistent with the policy objectives set out in section 7 of the Act, specifically paragraph 7(f) of the Act,²⁰ by increasing the efficiency and effectiveness of the Commission's regulatory framework.

137. Further, as contemplated by subsection 34(3)²¹ of the Act, the Commission finds, as a question of fact, that the forbearance determinations in this decision would not be likely to impair unduly the establishment or continuance of a competitive market for the services that are subject to the measures set out above.
138. Pursuant to subsection 34(4)²² of the Act, the Commission declares that, effective the date of this decision, sections 25 and 29 of the Act do not apply to Canadian carriers to the extent that those sections are inconsistent with the Commission's determinations in this decision.

Policy Direction

139. The streamlining changes adopted in this decision will increase efficiency, as well as provide greater clarity and consistency for both the industry and the Commission. As a result, they will further the objectives of the Act in accordance with the Policy Direction, which specifies, in part, that the Commission should only use tariff approval mechanisms that are as minimally intrusive and as minimally onerous as

²⁰ The cited objective of the Act is "to foster increased reliance on market forces for the provision of telecommunications services and to ensure that regulation, where required, is efficient and effective."

²¹ Subsection 34(3) of the Act states that "[t]he Commission shall not make a determination to refrain under this section in relation to a telecommunications service or class of services if the Commission finds as a question of fact that to refrain would be likely to impair unduly the establishment or continuance of a competitive market for that service or class of services."

²² Subsection 34(4) of the Act states that "[t]he Commission shall declare that sections 24, 25, 27, 29 and 31 do not apply to a Canadian carrier to the extent that those sections are inconsistent with a determination of the Commission under this section."

possible, and that it should continue to explore and implement new approaches for streamlining its processes.

Secretary General

Related documents

- *Proposals to improve tariff application and intercarrier agreement approval processes*, Telecom Notice of Consultation CRTC 2015-224, 28 May 2015
- *Notification requirements for competitive local exchange carriers seeking to offer local services in new exchanges, and filing of related documents*, Telecom Decision CRTC 2012-396, 20 July 2012
- *Network interconnection for voice services*, Telecom Regulatory Policy CRTC 2012-24, 19 January 2012
- *CISC Business Process Working Group, - Consensus report BPRE070a regarding Type III and Type IV CLEC agreement requirements*, Telecom Decision CRTC 2011-574, 8 September 2011
- *CISC Business Process Working Group – Non-consensus report BPRE075a regarding fulfillment of Type III and IV CLEC obligations*, Telecom Decision CRTC 2011-92, 11 February 2011
- *Approval processes for tariff applications and intercarrier agreements*, Telecom Information Bulletin CRTC 2010-455, 5 July 2010; as amended by Telecom Information Bulletin CRTC 2010-455-1, 19 February 2016
- *Approval mechanisms for retail and CLEC tariffs*, Telecom Decision CRTC 2008-74, 21 August 2008
- *Mandatory customer contract renewal notification and requirements for service destandardization/withdrawal*, Telecom Decision CRTC 2008-22, 6 March 2008
- *Forbearance with respect to certain inter-carrier agreements filed pursuant to section 29 of the Telecommunications Act*, Telecom Decision CRTC 2007-129, 14 December 2007
- *New procedures for disposition of applications dealing with the destandardization and/or withdrawal of tariffed services*, Telecom Circular CRTC 2005-7, 30 May 2005