



## Telecom Order CRTC 2021-89

PDF version

Ottawa, 23 February 2021

*Public record: Tariff Notice 555*

### **TELUS Communications Inc. – Destandardization of Dedicated Loop Service and Analogue Private Line Services**

*The Commission **approves** TCI's application to destandardize its Dedicated Loop Service and Analogue Private Line Services.*

#### **Application**

1. The Commission received an application from TELUS Communications Inc. (TCI), dated 8 October 2020, in which TCI proposed revisions to two items in its General Tariff. Specifically, TCI proposed to destandardize items 513 – Dedicated Loop Service (DLS) and 522 – Analogue Private Line Services (APLS) in order to destandardize these services.<sup>1</sup>
2. TCI proposed destandardizing these services so that new installations, moves, additions, and changes will no longer be available to existing customers, including the existing end-customers of resellers. DLS and APLS customers will be able to retain their existing services until they move, or change or disconnect the service.
3. The Commission received interventions regarding TCI's application from BC Hydro and the Municipal District of Bighorn No. 8 (MD of Bighorn).<sup>2</sup>

#### **Should the Commission approve TCI's application to destandardize DLS and APLS?**

##### **Positions of parties**

4. TCI proposed to destandardize DLS and APLS mainly due to equipment being discontinued by the manufacturer, which TCI submitted is beyond its control, making it increasingly difficult to source spare or used parts. TCI submitted that although it does not have a definitive timeline for the eventual service withdrawal, it

---

<sup>1</sup> DLS is a low-speed service, providing customers with the capability to monitor a change in the status of an alarm or of another type of monitoring sensor located at an alarm site. APLS were introduced in the 1980s to provide point-to-point or multipoint, non-switched voice-grade connections with customer locations, through the use of local channels and/or interexchange channels in TCI's operating territories in Alberta and British Columbia.

<sup>2</sup> The Commission also received two interventions that did not relate to the destandardization proposal.

is advising all remaining customers of DLS to consider options for substitute services before the supply of the equipment is depleted.

5. Further, TCI submitted that since the destandardization in 2015,<sup>3</sup> the total number of DLS and APLS customers has decreased, as well as the associated revenues.
6. TCI indicated that possible substitute services based on newer technology vary by customer and may include TCI's Internet Protocol (IP) network services, asymmetric digital subscriber line (ADSL) services, or wireless solutions. The substitutes typically support data transmission between customer locations at a much faster speed than DLS and APLS do. TCI has been working with some customers with more complex requirements to develop alternative solutions that meet their specific needs.
7. BC Hydro submitted that it neither supports nor opposes the application and understands that the application will neither change nor limit TCI's commitment to meet service level agreements and obligations to repair faulty circuits. BC Hydro indicated that APLS are critical to the provision of functions that ensure the reliable and safe operation of the power system at hydro facilities and on the transmission lines between them. BC Hydro indicated that it is reviewing options for a future transition of APLS to replacement services with TCI.
8. MD of Bighorn submitted that it was concerned about the potential impacts the reduction or elimination of DLS may have on the emergency services communications if the current TCI system is not supported or is replaced with a modern system of loop signaling.<sup>4</sup>
9. TCI indicated that the interventions related to the eventual withdrawal of APLS and the availability of substitute services; however the impact of the approval of its application is expected to be negligible for customers of both services at this time. The company clarified that its application does not propose any immediate forced migration or service withdrawal, and only proposes to disallow moves, additions, and changes to existing services.
10. TCI further noted that it fully acknowledges the importance of MD of Bighorn's and BC Hydro's APLS circuits for the communities they serve. The company submitted that it intends to continue to work with existing customers on finding substitute services that meet their specific needs, including developing migration plans.

---

<sup>3</sup> The DLS tariff item was previously grandfathered to new customers effective 10 June 2015, pursuant to Telecom Order 2015-226. The local channels and interexchange (intraprovincial) channels in the APLS tariff item were previously grandfathered to new customers effective 10 June 2015, pursuant to Telecom Order 2015-226. The majority of the other services covered in the APLS tariff were grandfathered to all existing and new customers effective 30 September 2004, pursuant to Telecom Order 2004-329.

<sup>4</sup> MD of Bighorn has DLS facilities in the Ghost River serving territory.

## Commission's analysis and determinations

11. TCI's application meets the requirements set out in Telecom Information Bulletin 2010-455-1, in which the Commission set out its procedures for dealing with applications to destandardize and/or withdraw tariffed services.<sup>5</sup> In particular, the company provided a description of the service affected by the proposed destandardization, the proposed date and rationale for the destandardization, and the number of customers affected. In addition, the company has provided a notice to each customer affected by its application to destandardize these particular services.
12. In particular, (i) DLS and APLS services are old technologies for which the network equipment has been manufacturer-discontinued for many years and for which replacement parts are no longer produced, making the services difficult to support as TCI upgrades its network equipment; (ii) the number of customers using the services continues to decline; (iii) notification has gone out to these customers informing them of the proposed destandardization of DLS and APLS; and (iv) TCI is working with customers to identify alternative services and migration timelines.
13. The Commission further considers that TCI has adequately addressed the concerns raised in the interventions. Therefore, the Commission considers that TCI's proposed destandardization is reasonable.
14. Accordingly, the Commission **approves** TCI's application.

## Policy Directions

15. In accordance with the 2019 Policy Direction,<sup>6</sup> the Commission considers that this order, which is based on a complete record, can promote competition, affordability, consumer interests, and innovation. Specifically, the approval of this application will promote affordability and consumer interests, since it (i) promotes consumer interests by allowing for the destandardization of outdated technologies and since TCI will be assisting remaining customers in moving to suitable service options, and (ii) ensures that customers have access to high-quality telecommunications services.
16. Further, in compliance with subparagraph 1(b)(i) of the 2006 Policy Direction, approval of TCI's application advances the policy objective set out in paragraph 7(f) of the *Telecommunications Act*.

---

<sup>5</sup> These procedures, which have been approved in various decisions and summarized in Telecom Information Bulletin 2010-455-1, were developed in order to comply with the directives set out in *Order Issuing a Direction to the CRTC on Implementing the Canadian Telecommunications Policy Objectives*, SOR/2006-355, 14 December 2006 (the 2006 Policy Direction). In particular, in relation to destandardization/withdrawal, the bulletin summarizes the Commission's 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*.

<sup>6</sup> *Order Issuing a Direction to the CRTC on Implementing the Canadian Telecommunications Policy Objectives to Promote Competition, Affordability, Consumer Interests and Innovation*, SOR/2019-227, 17 June 2019

Secretary General

**Related documents**

- *Approval processes for tariff applications and intercarrier agreements*, Telecom Information Bulletin CRTC 2010-455-1, 19 February 2016
- *TELUS Communications Company – Approval of tariff applications*, Telecom Order CRTC 2015-226, 28 May 2015
- *Mandatory customer contract renewal notification and requirements for service destandardization/withdrawal*, Telecom Decision CRTC 2008-22, 6 March 2008
- *Amalgamation of Analogue private line service*, Telecom Order CRTC 2004-329, 30 September 2004