May 8, 2009

Mr. Robert A. Morin
Secretary General
Canadian Radio-television and
Telecommunications Commission
Ottawa, ON K1A 0N2

Dear Mr. Morin:

Subject: Associated with Telecom Notice of Consultation 2009-194, Call for comments – Nomadic VoIP E911 service (TNC 2009-194) – Bell Request for Extension

1. Rogers Communications Inc. (Rogers) is in receipt of a request submitted to the Commission on May 1, 2009 by Bell Aliant Regional Communications, Limited Partnership and Bell Canada (collectively, Bell), seeking an extension for deadlines associated with TNC 2009-194. Among other things, TNC 2009-194 directed ILECs, cable companies and other parties to describe architectures and processes and develop cost studies and expected rate impacts relating to a Location Determination Platform (LDP). Bell has requested that filing of the above material be required by August 7, 2009, and that all other dates in TNC 2009-194 be revised accordingly. Rogers is also in receipt of a letter filed by MTS Allstream Inc. (MTS Allstream) dated May 4, 2009 in support of the extension requested by Bell.

2. Rogers supports the requested extension to the schedule for TNC 2009-194.

3. Both Bell and MTS argue that their resources are currently working vigorously to fulfill the requirements to implement Wireless E911 Phase 2, as determined by the Commission in Telecom Regulatory Policy CRTC 2009-40, Implementation of wireless Phase II E911 service (TRP 2009-40) and that the timing of deadlines in TNC 2009-194 places strain on accomplishing the wireless work efforts. Rogers is eager to proceed with the implementation of wireless Phase II E911 service and submits that resources should first complete this activity which was initiated prior to the release of TNC 2009-194.

4. In addition, Rogers itself faces resource pressures given the competing demands to respond to the June 22nd initial submission date in Telecom Notice of Consultation CRTC 2009-261 (TNC 2009-261) Proceeding to consider the appropriateness of mandating certain wholesale high-speed access services and to prepare for the Oral Hearing related to Telecom Public Notice CRTC 2008-19 (TPN 2008-19) Review of the Internet traffic management practices of Internet services providers scheduled to begin on July 6, 2009.
Given all these activities, Rogers will not be in a position to prepare and submit the requested costing information for Nomadic VoIP 911 service on June 15th.

5. Rogers considers that it could provide the requested information by Bell’s proposed revised date of August 7, 2009 (with all other dates being modified accordingly).

Yours very truly,


Kenneth G. Engelhart
Senior Vice President - Regulatory

Copy: Paul Godin - CRTC
     James Ndirangu - CRTC
     ILECs
     Cable Companies

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