October 2, 2009

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

Dear Mr. Morin:

Subject: Call for comments – Nomadic VoIP E9-1-1 service, Telecom Notice of Consultation CRTC 2009-194 (“Notice 2009-194”) – Response to request for further information of TELUS Communications Company (“TELUS” or the “Company”)

1. TELUS is in receipt of a deficiency request from the Coalition of Internet Service Providers Inc. (“CISP”) dated September 25, 2009 filed in relation to the proceeding initiated by Notice 2009-194. In this deficiency request, CISP requested further information regarding one of the Company’s interrogatory responses filed for this proceeding. In accordance with the instructions of the Commission provided in Notice 2009-194 and in Commission staff letter dated August 28, 2009, TELUS responds to CISP’s deficiency request.

2. In interrogatory TELUS_all ILECs (CISP)28Aug09-11,¹ CISP referred to a hypothetical architecture for nomadic VoIP E-9-1-1 service provisioning that does not involve LIS infrastructure. TELUS was then asked to provide the “relative percentage value of the total PWACs of your solution, the portion, which would be related to the implementation of the Ci2 solution without any LIS infrastructure, either Hosted-LIS or ILEC-as-an-ASP LIS [emphasis added].”

¹ CISP posed this interrogatory to all ILECs in the proceeding.
3. In interrogatory response TELUS_all ILECs (CISP)28Aug09-11, TELUS stated that the information requested in this interrogatory “is irrelevant for the determinations in this proceeding” and objected to filing a response. CISP now requests for TELUS to respond to this interrogatory. Also, because MTS Allstream Inc. (“MTS Allstream”) provided a response to the same interrogatory posed, CISP alleges that MTS Allstream acknowledged “the importance that this information be provided on the public record.”

4. In response, TELUS reiterates that the information requested by CISP is completely irrelevant to this proceeding. In Notice 2009-194, the Commission clearly identified the “specific issues” under consideration in this proceeding. Those four issues are the following.

I. What are the LDP costs?
II. Who should pay for the various costs of implementing nomadic VoIP E9-1-1 service?
III. Should small ASPs be exempt from implementing an LDP?
IV. Are there alternative solutions that would improve on the current nomadic VoIP 9-1-1 service?

5. The specific issues were identified by the Commission in order to assess the full costs of the Ci2 solution for nomadic VoIP E9-1-1. What is plainly relevant in this proceeding are the costs of implementation for the LDP, and those are the only costs that are required for the determination of the issues in this proceeding, meaning that the costs data requested by CISP are out of scope.

6. In addition, the Ci2 solution under consideration for nomadic VoIP E9-1-1 includes the implementation of a LIS. In its interrogatory, CISP has attempted to force ILECs to provide estimated costs of a solution that remains hypothetical at this time. For these reasons, TELUS maintains its objection to providing a response to this interrogatory.

7. Also, the fact that another party has provided an answer to this interrogatory does not make the response relevant to the proceeding, nor does it create an obligation upon TELUS to provide a response. The requested data remain irrelevant, even if some parties may have chosen to provide them. Furthermore, MTS Allstream has not acknowledged the importance of the requested information. It has simply

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2 CISP deficiency request, para. 3.
3 See Notice 2009-194, para. 17.
provided some data that CISP has requested, but has not made any statement that the information is important.

8. Finally, as noted in the interrogatory response, the requested information from CISP is confidential in nature. As a result, even if TELUS were to file a response to this interrogatory, TELUS would claim confidentiality for the data and would its response in confidence with the Commission.

Yours truly,

{original signed by Ted Woodhead}

Ted Woodhead  
Vice-President  
Telecom Policy & Regulatory Affairs

EE/cs

cc: Interested parties to Notice 2009-194  
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