

Speakers Notes:

Providing local services to wide-reaching, large geographic areas with low population densities is generally more costly than providing the same service within urban areas.





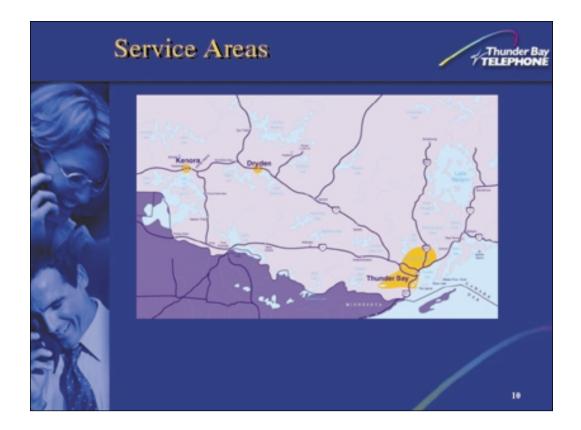














Our Goals

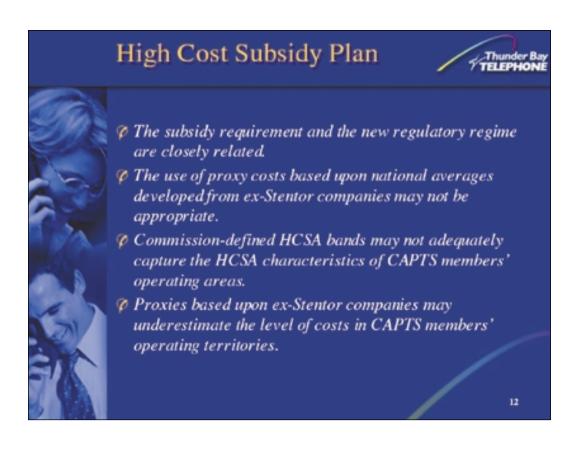


To ensure that the CAPTS customers continue to have access to reliable and affordable services in concert with the implementation of the new national HCSA subsidy plan and the elimination of contribution revenues.

To assist the Commission in the development of an appropriate price regulation regime, which will provide the CAPTS members with the incentives to be more efficient and innovative with the opportunity to earn a fair return and, at the same time, reduce the regulatory burden.

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Decision 99-16, 19 October 1999

Telephone Service to High Cost Serving Areas



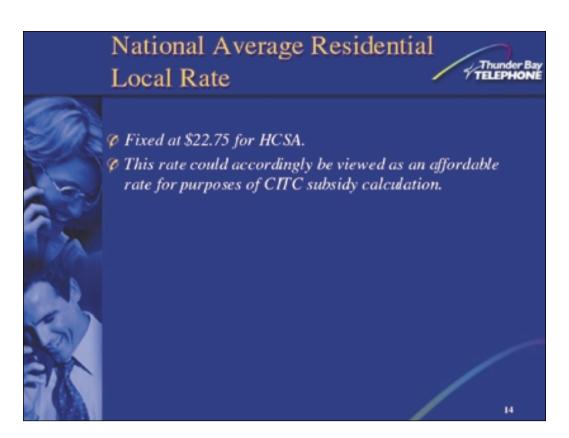
Decision 99-16 states:

"a clearly defined geographical area where the incumbent local exchange carrier's monthly costs to provide basic service are greater than the associated revenues generated by an affordable rate as approved by the Commission. Costs are estimated using Phase II or Phase II-like costs, plus an appropriate mark-up (Phase II costs are long-run, incremental costs calculated in accordance with directives established by the Commission)." [paragraph 17]

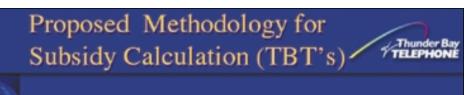
Speakers Notes:

Consistent with the above definition of an HCSA, TBT operates in a clearly defined geographical area encompassing the City of Thunder Bay and surrounding areas. TBT is currently in the process of calculating it's costs to provide basic residential service in its operating area using Phase II like costs and an appropriate mark-up. Accordingly, once these costs are calculated an HCSA subsidy determination could then rely on whether the calculated costs are greater than an affordable rate as approved by the Commission.









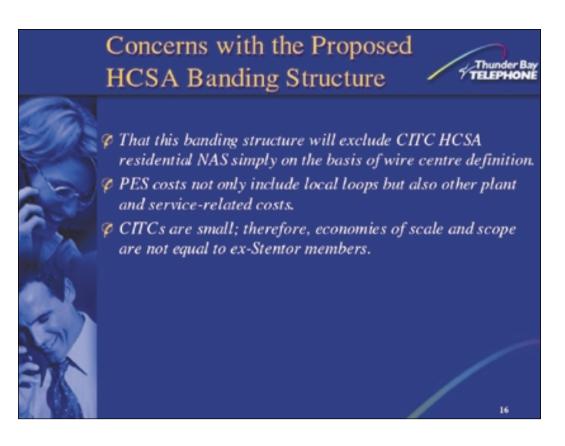
CITC's costs to provide basic residential service in its operating territory using Phase II methods and a mark-up.
Less the National Average Residential Rate.
Less the CITC's deemed revenue from other services.

Speakers Notes:

Compare CITC's average PES residential costs to the ex-Stentor national weighted average residential price to determine the extent to which a subsidy is needed..

- avoids definitional distortions related to wire centre sizes and architectures
- provides an incentive to move local rates closer to the national weighted average
- recognizes the relatively higher cost to provide service in a small CITC
- provides basis to move to price regulation

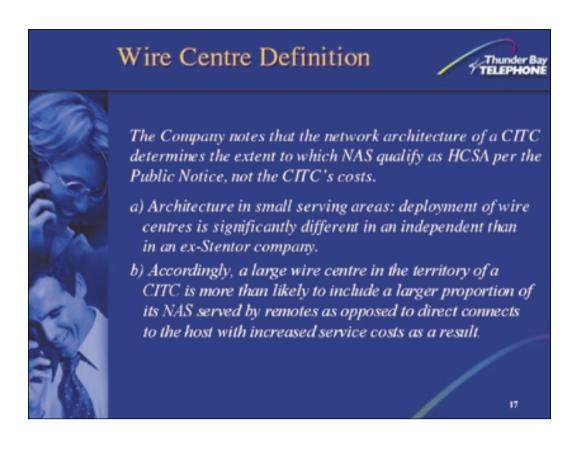




Speakers Notes:

- material costs (volume discounts), equipment, vehicles
- plant operations would be higher in CITC's based upon reduced scale of operations
- remoteness, low exchange density and long loops

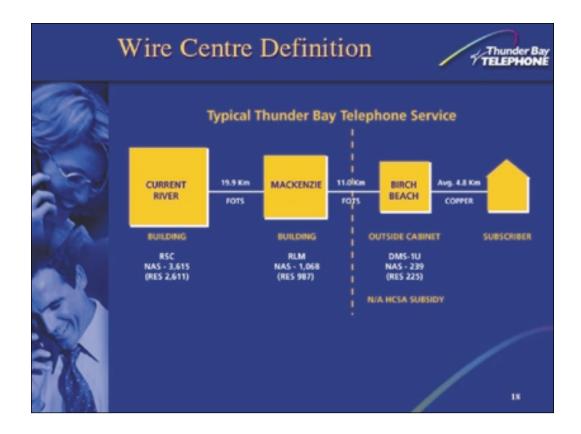




Speakers Notes:

The fact that a wire centre with greater than 8,000 NAS is considered non high cost in the operating territory of an ex-Stentor company does not necessarily track with the situation of a greater that 8,000 wire centre in the operating area of a CITC.





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National Average Phase II cost including 15% mark-up



On the matter of the 15% mark up to be applied to the Phase II costs, CAPTS notes that the 15% was explained in Decision 2000-745 to recover fixed common costs and not intended to recover differences between Phase III embedded costs and Phase II current costs.

CAPTS also notes that in that Decision the Commission explained that a limited amount of quantitative evidence was provided to support an appropriate mark-up.

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National Average Phase II cost including 15% mark-up



CAPTS agrees that the level of mark up should not be set to recover differences between Phase III and Phase II costs. Accordingly, CAPTS does not object to the defined 15% mark-up subject to the Company being able to confirm that its fixed costs as a percentage of its Phase II costs fall within this percent range.



Deemed Revenue from Other Services



On the matter of whether any downward adjustments to the monthly \$5 implicit contribution amount per residential NAS generated by other local services is appropriate, CAPTS notes that the monthly amount generated by other local services in its operating territory is significantly below the \$5 implicit contribution amount. Considering a move of local rates towards the national average (\$22.75) may negatively affect the penetration level of these other services.

Accordingly, CAPTS proposes that the contribution amount be initially set at a CITC's actual amount in the first year with an incremental phase-in of \$0.50 per year per residence NAS over a 3 year period or the period in which the approved threshold is reached.



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Subsidy Requirement – HCSA Business NAS



On the matter of subsidized HCSA business NAS, CAPTS is of the view that such a subsidy is not appropriate or required if the residential subsidy is calculated as proposed.

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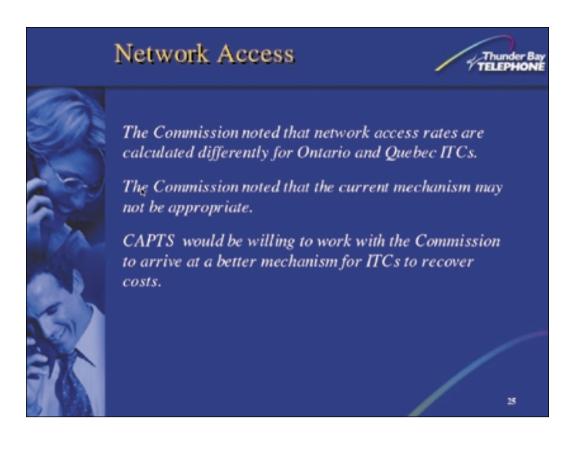




Speakers Notes:

With respect to the apportionment of the costs among interconnected carriers CAPTS does not at this time see a better causal relationship between the costs borne by the Company in providing the service and the service provided to a long distance service provider than originating and terminating minutes





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