



2006 10 06

Ms. Diane Rhéaume
Secretary General
Canadian Radio-television and
Telecommunications Commission
Ottawa, Ontario
K1A 0N2

David J. Hennessey
Manager,
Regulatory Matters

Dear Ms. Rhéaume:

Re: Telecom Public Notice CRTC 2006-10, Continued need for the regulatory constraints applicable to toll and toll-free services - Requests for further responses to interrogatories and disclosure of information filed in confidence

1. As per the procedures set out in the above-captioned Public Notice, this is the response of Bell Aliant Regional Communications, Limited Partnership ("Bell Aliant") to a request for further responses to interrogatories or disclosure of information filed in confidence from the Public Interest Advocacy Centre ("PIAC") on behalf of the Consumer Groups.

Bell Aliant(ConsumerGroups)1Sep06-01 PN06-10)

2. Contrary to PIAC's claim, the number of Bell Aliant customers who are basic toll customers was not requested by PIAC in its interrogatory. The PIAC question asked for the number of Bell Aliant long distance subscribers who also subscribed to VoIP service and requested the information split by plan and no plan. The Company responded that it does not have the requested information.
3. In order to answer the question Bell Aliant would have to have information about customers of VoIP service providers, which it does not have. PIAC's deficiency request should be dismissed because the information is unavailable.
4. In the deficiency claim, PIAC is now posing a new question not asked in the original interrogatory. They are requesting that Bell Aliant's toll subscribers be split by "plan customers" and "non plan" customers. PIAC should not be permitted to address new interrogatories under the pretext of a deficiency request.
5. The deficiency claim should be dismissed for the reasons cited above.

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Bell Aliant(Consumer Groups)1Sep06-2 PN2006-10

6. PIAC's request for further disclosure should be dismissed on the basis that Bell Aliant simply has no way of knowing which of our toll customers use Peer to Peer ("P2P") services. In order to answer the question, Bell Aliant would have to have information about customers of P2P service providers, which it does not have. PIAC's deficiency request should be dismissed because the information is unavailable.

Bell Aliant (Consumer Groups)1Sep06-3 PN2006-10

7. PIAC's request for further disclosure should be dismissed on the basis that Bell Aliant simply has no way of knowing which of our toll customers use Instant Messaging ("IM") services. In order to answer the question, Bell Aliant would have to have information about customers of IM service providers, which it does not have. PIAC's deficiency request should be dismissed because the information is unavailable.

Bell Aliant (Consumer Groups)1Sep06-4 PN2006-10

8. PIAC's request for further disclosure should be dismissed on the basis that Bell Aliant simply has no way of knowing which of our toll customers use email. In order to answer the question Bell Aliant would have to have information about customers of email service providers, which it does not have. PIAC's deficiency request should be dismissed because the information is unavailable.

Bell Aliant (Consumer Groups)1Sep06-5 PN2006-10

9. PIAC's request for further disclosure should be dismissed on the basis that Bell Aliant simply has no way of knowing which of our toll customers use wireless long distance services. In order to answer the question, Bell Aliant would have to have information about customers of wireless service providers, which it does not have. PIAC's deficiency request should be dismissed because the information is unavailable.

Bell Aliant (Consumer Groups)1Sep06-6 PN2006-10

10. Bell Aliant submits that the Company's response to this interrogatory was not deficient. The Company was asked to provide surveys, studies, figures or any other document profiling the demographics of Bell Aliant basic toll subscribers. The Company has no such studies, surveys or documents. The Company submits that if such information was available, and it is not, it would not be relevant to the proceeding.

Sincerely,



cc: P.I.A.C. (for Consumer Groups)