

Richard A. Stephen

Director - Regulatory Matters Saint John Brunswick Sq., Flr. 5 Saint John, NB Canada E2L 4K2

Bus: (506) 694-6512 Fax: (506) 694-2473

E-mail: regulatory.matters@aliant.ca

2005 06 30

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

Dear Ms. Rhéaume:

Subject: <u>Telecom Public Notice CRTC 2005-2, Forbearance from regulation of local exchange services</u>

- Aliant Telecom Inc. ("Aliant" or "the Company") is in receipt of a Commission letter dated 2005 06 29 requesting that interested parties comment on the Public Interest Advocacy Centre (PIAC) submission. PIAC argues that parts of the Bell Canada 2005 05 22 submission in response to Telecom Public Notice CRTC 2005-2, Forbearance from regulation of local exchange services ("PN 2005-2") are out of scope and therefore should be struck from the record of the proceeding. Aliant provides the following comments.
- 2. In the introduction to PN 2005-2 the Commission stated: "Commission initiates a proceeding and invites comments on a framework for forbearance from the regulation of residential and business local exchange services." Further at Paragraph 20 of PN 2005-2 the Commission reiterates: "In this proceeding, the Commission will determine the framework, including the criteria, for forbearance from the regulation of residential and business local exchange services." Aliant submits that Bell's submission including those sections questioned by PIAC provides the Commission with comments on Local Exchange Services including discretionary services and therefore is within the scope of this proceeding. The Commission and the interested parties to this proceeding can not expect that only one framework for forbearance of Local Exchange services will be proposed by the parties.
- 3. Further, Aliant notes that services approved by the Commission in Decision 2005-35 as being within the scope of this proceeding, includes the same services provided in Appendix C of the Bell submission.

- 4. Aliant submits that for the Commission to agree with PIAC and to not allow an examination of possible options of the framework for forbearance would be inconsistent with the spirit of Public Notice 2005-2.
- 5. The framework for the forbearance of all Local Exchange services, including what Bell has indicated as discretionary services, should be part of the proceeding, as contemplated by the Public Notice. Accordingly, Aliant requests that the Commission deny the PIAC proposal.

Yours truly,

**Director - Regulatory Matters** 

cc: Interested Parties to Public Notice CRTC 2005-2