



Canadian Cable
Telecommunications Association

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November 10, 2005

Len Katz
Executive Director
Telecommunications Directorate
Canadian Radio-television and Telecommunications Commission
Ottawa, Ontario
K1A 0N2

Dear Mr. Katz:

Re: Proposal to consider MPLS for Cable's TPIA Service in the CISC NTWG

The Canadian Cable Telecommunications Association (CCTA) is writing to request that the CRTC terminate all discussions in the CISC related to a request by Xit Telecom Inc. (Xit) to explore use of MPLS VRF for TPIA interconnection. CCTA submits that it is not appropriate to consider that carriers be required to implement specific technologies or network architectures for which carriers currently have no plans.

CCTA is in receipt of the CRTC staff letter issued 25 October 2005 to Steering Committee members identifying that they have decided to forward the Xit contribution titled "Multi-VRF interconnection for third-party access to higher speed access services of Cable Carrier Networks" to the CISC Network Working Group (NTWG) for consideration.

The Xit proposal was filed with the Commission in the form of a contribution to the High Speed Working Group on 17 July 2005. Due to the fact that the HSWG is no longer operational, the contribution was forwarded to the CISC Steering Committee for consideration. It was placed on the 23 August 2005 meeting agenda. Discussion on the specific contribution was deferred due to a lack of participation by ISPs and cable carriers. The Commission then issued a call for comments regarding the proposal. CCTA,

representing cable carrier members, was the only party to file comments. The Commission re-scheduled the discussion for the next Steering Committee meeting, which took place 13 October 2005. Again, the only parties participating in the discussion were the cable carriers aside from Xit.

At that meeting, CCTA and the cable carriers argued that the request made by Xit to use the procedures stipulated in Chapter 8 of the Cisco MPLS VPN User Guide V4.0 for TPIA would involve a change to the architecture and technology employed by cable carriers in the core part of their network. CCTA further noted that the use of a Multi-VRF interconnection goes well beyond defining a simple interconnection standard. Xit refers to a specific vendor and technology to be used in the cable carriers' networks. In fact, consideration of Xit's proposal goes well beyond the Commission's mandate and s.40 of the *Telecommunications Act*.

40. (1) The Commission may order a Canadian carrier to connect any of the carrier's telecommunications facilities to any other telecommunications facilities.

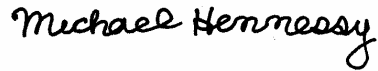
(2) An order may require the connection to be made at or within such time, and subject to such conditions, if any, as to compensation or otherwise, as the Commission determines to be just and expedient.

The discussion of the above issue at the Steering Committee ended when the chair of the Steering Committee proposed that it was not the intent of the Commission to specify technologies. In fact, the Chair indicated that Commission policies and Decisions have been expressly designed to be technology-neutral. He then concluded that he would take the issue under consideration within the CRTC and respond back to the members of the SC with a proposal. The Commission staff is now proposing that the contribution filed by Xit on 17 July 2005 be forwarded to the NTWG for consideration and discussion.

CCTA is of the view that the proposal to consider Xit's contribution in the NTWG is unwarranted and could well result in outcomes that would be inconsistent with the Commission's technology-neutral approach and the *Telecommunications Act*. Consideration of whether to require cable carriers to implement a specific vendor's solution is inappropriate since any such implementation would impose network-wide changes on carriers' networks. This would impact not only cable carriers but also the telephone companies' wholesale offerings. CCTA respectfully submits that such an outcome would go well beyond the scope and mandate of the CISC. The Xit contribution raises broader policy issues as to the appropriateness of requiring carriers to implement specific technologies for which the carriers currently have no plans.

For the reasons stated above, CCTA and its members are opposed to the resolution of the Steering Committee and hereby request that the Commission determine that there be no further discussion of the Xit contribution.

Sincerely,

A handwritten signature in black ink that reads "Michael Hennessy". The signature is written in a cursive style with a prominent loop at the end of the last name.

Michael Hennessy

cc. Richard French, CRTC
Mike Cawood, CRTC
Sam Yung, Chair NTWG

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