



Telecom Decision CRTC 2005-44

Ottawa, 5 August 2005

Forbearance from regulating interexchange private line services on additional routes

Reference: 8638-S1-01/98

In this Decision, the Commission forbears, with some conditions, from regulating high capacity/digital data interexchange private line services on those additional routes for which competitors of several incumbent local exchange carriers now offer or provide such services at DS-3 or greater bandwidth.

1. In *Follow-up Proceeding to Telecom Decision CRTC 97-20: Establishment of criterion and process for considering further forbearance for High Capacity/DDS interexchange private line services*, Telecom Order CRTC 99-434, 12 May 1999 (Order 99-434), the Commission directed competitors that provide telecommunications services to file a semi-annual report identifying interexchange private line (IXPL) routes on which they provide or offer to provide high capacity/digital data services (DDS) IXPL services (IXPL services) to at least one customer, at the equivalent of DS-3 or greater bandwidth, using terrestrial facilities from a company other than from the incumbent local exchange carrier (ILEC) or an affiliate of the ILEC.
2. In a letter dated 23 March 2005, Commission staff requested that, in the 1 April 2005 filings, all competitors, including out-of-territory affiliates of the ILECs, broadcasting distribution undertakings (BDUs) and BDU affiliates that provide telecommunications services, and hydro electric entities with telecommunications operations, report all their IXPL routes that comply with the forbearance criterion established in Order 99-434, including all routes that a competitor may have previously reported as part of the semi-annual filings pursuant to Order 99-434.
3. The Commission received April 2005 filings from the following competitors: Atco Utility Services Ltd. (Atco), Axia SuperNet Ltd. (Axia), Bell Canada, including IXPL routes filed on behalf of its affiliate Bell West Inc. (BWI), Call-Net Enterprises Inc., now Rogers Telecom Holdings Inc. (Rogers Telecom Holdings), Bragg Communications Inc. operating as EastLink (EastLink), TELUS Communications Inc. (TCI), FibreTech Telecommunications Inc. (FibreTech), Fibrewired Hamilton (Fibrewired), MTS Allstream Inc. (MTS Allstream), Saskatchewan Telecommunications (SaskTel) on behalf of Navigata Communications Ltd., O.N. Tel Inc. operating as Ontera (Ontera), the law firm of Benson Miles on behalf of Persona Communications Corp. (Persona), SCBN Telecommunications Inc. (SCBN), Shaw Cablesystems G.P. on behalf of itself and Shaw Telecom Inc. and Big Pipe Inc. (Shaw), and Quebecor Média inc. on behalf of Videotron Telecom Ltd. (VTL).

4. NorthernTel, Limited Partnership (NorthernTel) has not yet filed its April 2005 IXPL report. Once NorthernTel's filings are received, the Commission will issue a decision on possible forbearance from additional IXPL routes in Ontera's and NorthernTel's service territories, in accordance with *Northern Telephone Limited and O.N. Tel: forbearance from IXPL and ATM services*, Order CRTC 2000-631, 7 July 2000 (Order 2000-631).

Background

5. The Commission's power to forbear from regulating a telecommunications service or class of services provided by a Canadian carrier originates from section 34 of the *Telecommunications Act* (the Act), which reads as follows:

34. (1) The Commission may make a determination to refrain, in whole or in part and conditionally or unconditionally, from the exercise of any power or the performance of any duty under sections 24, 25, 27, 29 and 31 in relation to a telecommunications service or class of services provided by a Canadian carrier, where the Commission finds as a question of fact that to refrain would be consistent with the Canadian telecommunications policy objectives.

(2) Where the Commission finds as a question of fact that a telecommunications service or class of services provided by a Canadian carrier is or will be subject to competition sufficient to protect the interests of users, the Commission shall make a determination to refrain, to the extent that it considers appropriate, conditionally or unconditionally, from the exercise of any power or the performance of any duty under sections 24, 25, 27, 29 and 31 in relation to the service or class of services.

(3) The Commission shall not make a determination to refrain under this section in relation to a telecommunications service or class of services if the Commission finds as a question of fact that to refrain would be likely to impair unduly the establishment or continuance of a competitive market for that service or class of services.

(4) The Commission shall declare that sections 24, 25, 27, 29 and 31 do not apply to a Canadian carrier to the extent that those sections are inconsistent with a determination of the Commission under this section.

6. The Canadian telecommunications policy objectives set out in section 7 of the Act include the following:

...

(c) to enhance the efficiency and competitiveness, at the national and international levels, of Canadian telecommunications;

(f) to foster increased reliance on market forces for the provision of telecommunications services and to ensure that regulation, where required, is efficient and effective;

(h) to respond to the economic and social requirements of users of telecommunications services.

7. The Commission established a framework for considering whether or not to forbear in *Review of regulatory framework*, Telecom Decision CRTC 94-19, 16 September 1994 (Decision 94-19). In that decision, the Commission noted that the assessment of competitiveness begins with a definition of the relevant market, as the relevant market forms the basis for the entire forbearance exercise. The relevant market is essentially the smallest group of products and geographic area in which a firm with market power can profitably impose a sustainable price increase. The Commission established a number of criteria to be examined when determining whether a market was competitive. These criteria include the market shares of the dominant and competing firms, demand and supply conditions, the likelihood of entry into the market, barriers to entry into the market and evidence of rivalrous behaviour.
8. In *Stentor Resource Centre Inc. - Forbearance from regulation of interexchange private line services*, Telecom Decision CRTC 97-20, 18 December 1997 (Decision 97-20), the Commission, further to an analysis in accordance with the framework set out in Decision 94-19, granted forbearance pursuant to section 34 of the Act with respect to the provision of IXPL services for the routes identified in that decision. The Commission found that forbearance from regulation of the routes at issue would, under subsection 34(1) of the Act, be consistent with the Canadian telecommunications policy objectives set out in section 7 of the Act, including paragraphs 7(c) and (f). The Commission also found that it would be appropriate to forbear under subsection 34(2) of the Act on the basis that the forborne services are or will be subject to a level of competition sufficient to protect the interests of users of these services. Finally, the Commission found, pursuant to subsection 34(3) of the Act, that to forbear would not impair unduly the establishment or continuance of a competitive market for the forborne services.
9. In Decision 97-20, the Commission partially forbore from regulation of IXPL services provided by the former Stentor member companies for the identified routes. These companies are now referred to as the large ILECs.
10. In Decision 97-20, the Commission noted that IXPL services were offered and provided on a route-specific basis and customers required these services on one or more routes. The Commission determined that each route should be considered as a separate market for purposes of forbearance analysis, and that to the extent that forbearance is appropriate, it should be with respect to routes for which rivalrous competition exists or will exist in the near future.
11. In Order 99-434, the Commission determined that, given that the IXPL market is route-specific, forbearance from a route would be granted upon the Commission being satisfied that one or more competitors of an ILEC are offering or providing on that route IXPL services, at the equivalent of DS-3 or greater bandwidth, using terrestrial facilities from other than the ILEC in question or an affiliate of the ILEC.

12. In Order 99-434, the Commission directed competitors to report to the Commission semi-annually their IXPL routes that meet the above-mentioned criterion. The Commission stated that after receiving the reports it expected to issue quickly an order granting forbearance to the appropriate ILECs for the routes in question, based on the criterion having been met. The Commission determined that the scope of forbearance would be the same as in Decision 97-20. The Commission also stated that ILECs were not precluded from submitting applications for forbearance with respect to High Capacity/DDS services on routes not identified by competitors.
13. In *Telecom Order CRTC 99-905*, 17 September 1999 (Order 99-905), the Commission extended the IXPL forbearance process of Order 99-434 to Québec-Téléphone (TCQ) and Télébec ltée (now Société en commandite Télébec). In Order 99-905, the Commission determined that the scope of forbearance would be the same as in Decision 97-20.
14. With respect to the scope of forbearance, in Decision 97-20 the Commission forbore from the exercise of its powers and duties under section 25, subsections 27(1), 27(2), and section 31 of the Act. The Commission found it appropriate to impose conditions pursuant to section 24 of the Act with respect to the protection of customer confidential information, since the ILECs' Terms of Service, which protect customer confidentiality in relation to regulated services, do not apply to forborne services. The Commission also imposed conditions preventing the bypass of Canadian telecommunications services and facilities. In addition, the Commission retained its powers pursuant to section 24 of the Act, to impose future conditions upon the forborne services provided by the ILEC, where the circumstances so warrant.
15. In Decision 97-20, the Commission considered that it was appropriate to retain its powers pursuant to subsection 27(3) of the Act to the extent that this subsection did not refer to compliance with powers and duties not forborne from in that decision.
16. Subsequent to Decision 97-20, the Commission has forborne from section 29 of the Act in relation to forborne IXPL services provided by TCI in *TELUS application for forbearance from section 29 of the Telecommunications Act with respect to forborne interexchange private line and long distance services*, Telecom Decision CRTC 2003-77, 19 November 2003 (Decision 2003-77), and by Bell Canada, Aliant Telecom Inc. (Aliant Telecom), MTS Allstream and SaskTel in *Aliant Telecom, Bell Canada, MTS Allstream and SaskTel - Forbearance from section 29 of the Act for agreements related to forborne domestic toll services and forborne interexchange private line services*, Telecom Decision CRTC 2004-80, 9 December 2004 (Decision 2004-80).
17. In Order 2000-631, the Commission determined that it would forbear, on a route-specific basis, with respect to IXPL services provided by Northern Telephone Limited (now NorthernTel and Ontera), employing the forbearance criteria and process specified in Order 99-434. With respect to the scope of forbearance, in Order 2000-631 the Commission indicated that it would forbear from the exercise of all of its powers and the performance of all of its duties under sections 24 (in part), 25, 29 and 31 and subsections 27(1), 27(5) and 27(6) of the Act. Further, the Commission determined that if either NorthernTel or Ontera is able to provide IXPL services on a forborne basis on a route, the Commission would also forbear from IXPL services provided by the other carrier on that route, Ontera or NorthernTel, as the case may be.

Commission's analysis and determination

18. In their 1 April 2005 filings, competitors submitted reports on numerous IXPL routes. As requested, competitors identified previously forborne routes and many new routes on which they provide or offer to provide IXPL services to at least one customer, at the equivalent of DS-3 or greater bandwidth using terrestrial facilities from a company other than the ILEC or an affiliate of the ILEC.
19. The Commission notes that Bell Canada reported several IXPL routes where Bell Canada or BWI, a Bell Canada affiliate, provides or offers to provide IXPL services and Bell Canada is the ILEC in one of the exchanges. For example, Bell Canada reported that it provides or offers to provide IXPL services between Toronto, Ontario and Camrose, Alberta and between Woodstock, Ontario and Vernon, British Columbia, exchanges in Bell Canada's and TCI's territories.
20. Bell Canada also reported that it provides or offers to provide IXPL services where NorthernTel, a Bell Canada affiliate, is the ILEC in one or both of the exchanges. For example, Bell Canada reported that it provides or offers to provide IXPL services between Haileybury, Ontario and Kapuskasing, Ontario, two NorthernTel exchanges.
21. The Commission is of the view that it would only be appropriate to forbear from the regulation of IXPL services along the IXPL routes described above if at least one competitor is offering or providing such services at the equivalent of DS-3 or greater bandwidth on those routes using terrestrial facilities other than from the ILEC or ILECs or an affiliate of the ILEC or ILECs in the respective exchanges.
22. The Commission is of the view that, since no competitor provides or offers to provide IXPL services at the equivalent of DS-3 or greater bandwidth between the exchanges listed above, forbearance would be inconsistent with Order 99-434 and it would therefore not be appropriate to forbear from regulating IXPL services along these routes.

Application of subsections 34(1), (2) and (3) of the Act

23. The Commission finds, pursuant to subsection 34(1) of the Act, as a question of fact, that to refrain from the exercise of its powers and the performance of its duties, to the extent set out in this Decision, with respect to the regulation of the IXPL services on the routes listed in the Appendix, is consistent with the Canadian telecommunications policy objectives set out in section 7 of the Act.
24. The Commission also finds, pursuant to subsection 34(2) of the Act, as a question of fact, that the IXPL services on the routes listed in the Appendix are subject to a level of competition sufficient to protect the interests of users and that, therefore, it is appropriate to refrain, to the extent set out in this Decision, from regulating IXPL services provided on these routes.

25. Further, the Commission finds, pursuant to subsection 34(3) of the Act, as a question of fact, that refraining from regulating the IXPL services on the routes listed in the Appendix, to the extent set out in this Decision, is unlikely to impair unduly the continuance of a competitive market for these services.
26. In light of all of the above, the Commission finds that, based on the reports filed by Atco, Axia, Bell Canada, BWI, Rogers Telecom Holdings, EastLink, Fibrewired, FibreTech, MTS Allstream, SaskTel, SCBN, Shaw, TCI, Persona, Ontera and VTL, pursuant to Order 99-434, the IXPL routes listed in the Appendix satisfy the criteria under section 34 of the Act for a forbearance determination by the Commission.
27. The Commission determinations on the extent to which it is appropriate to refrain, in whole or in part, and conditionally or unconditionally, from the exercise of any powers or the performance of any duty under sections 24, 25, 27, 29 and 31 of the Act are set out below.

Section 24

28. Section 24 of the Act provides:

24. The offering and provision of any telecommunications service by a Canadian carrier are subject to any conditions imposed by the Commission or included in a tariff approved by the Commission.

29. The Commission considers that it is appropriate to retain its powers, pursuant to section 24 of the Act, to ensure that the confidentiality of customer information continues to be protected. Accordingly, the Commission directs the ILECs whose territory includes one or more of the IXPL routes forborne from in this Decision (the affected ILECs), on a going-forward basis, to incorporate, where appropriate, the existing conditions regarding disclosure of confidential customer information to third parties into all contracts and any other arrangements for the provision of the services forborne from regulation in this Decision.
30. The Commission considers that it is also appropriate to retain sufficient powers under section 24 of the Act to specify possible future conditions upon the forborne services provided by the affected ILECs, where circumstances so warrant.
31. The Commission notes that the restrictions against the bypass of Canadian telecommunications services and facilities were terminated in *Regulatory regime for the provision of international telecommunications services*, Telecom Decision CRTC 98-17, 1 October 1998. Therefore, there is no need to impose a condition in this regard pursuant to section 24 of the Act as was done in Decision 97-20.

Section 25

32. Section 25 of the Act provides:

25. (1) No Canadian carrier shall provide a telecommunications service except in accordance with a tariff filed with and approved by the Commission that specifies the rate or the maximum or minimum rate, or both, to be charged for the service.

(2) A joint tariff agreed on by two or more Canadian carriers may be filed by any of the carriers with an attestation of the agreement of the other carriers.

(3) A tariff shall be filed and published or otherwise made available for public inspection by a Canadian carrier in the form and manner specified by the Commission and shall include any information required by the Commission to be included.

(4) Notwithstanding subsection (1), the Commission may ratify the charging of a rate by a Canadian carrier otherwise than in accordance with a tariff approved by the Commission if the Commission is satisfied that the rate

(a) was charged because of an error or other circumstance that warrants the ratification; or

(b) was imposed in conformity with the laws of a province before the operations of the carrier were regulated under any Act of Parliament

33. The Commission considers it appropriate that the affected ILECs no longer be required to file tariffs and obtain the Commission's approval in respect of the IXPL services on the routes forborne from in this Decision. Accordingly, the Commission will refrain from the exercise of all of its powers and the performance of all of its duties under section 25 of the Act with respect to the forborne services in this Decision.

Section 27

34. Section 27 of the Act provides:

27. (1) Every rate charged by a Canadian carrier for a telecommunications service shall be just and reasonable.

(2) No Canadian carrier shall, in relation to the provision of a telecommunications service or the charging of a rate for it, unjustly discriminate or give an undue or unreasonable preference toward any person, including itself, or subject any person to an undue or unreasonable disadvantage.

(3) The Commission may determine in any case, as a question of fact, whether a Canadian carrier has complied with section 25, this section or section 29, or with any decision made under section 24, 25, 29, 34 or 40.

(4) The burden of establishing before the Commission that any discrimination is not unjust or that any preference or disadvantage is not undue or unreasonable is on the Canadian carrier that discriminates, gives the preference or subjects the person to the disadvantage.

(5) In determining whether a rate is just and reasonable, the Commission may adopt any method or technique that it considers appropriate, whether based on a carrier's return on its rate base or otherwise.

(6) Notwithstanding subsections (1) and (2), a Canadian carrier may provide telecommunications services at no charge or at a reduced rate

(a) to the carrier's directors, officers, employees or former employees; or

(b) with the approval of the Commission, to any charitable organization or disadvantaged person or other person.

35. The Commission considers that there is no need to apply the regulatory standards for "just and reasonable" rates to rates that are set in a competitive market. Accordingly, the Commission will refrain from the exercise of all of its powers and the performance of all of its duties under subsection 27(1) of the Act with respect to the IXPL services on the routes forborne from in this Decision.
36. Similarly, the Commission will refrain from the exercise of all of its powers and the performance of all of its duties under subsection 27(2) of the Act with respect to the IXPL services on the routes forborne from in this Decision.
37. The Commission will also refrain from the exercise of all of its powers and the performance of all of its duties under subsections 27(4) and 27(5) of the Act, since these subsections relate to subsections 27(1) and (2) of the Act, with respect to the IXPL services on the routes forborne from in this Decision.
38. The Commission will also refrain from the exercise of all of its powers and the performance of all of its duties under subsection 27(6) of the Act with respect to the IXPL services on the routes forborne from in this Decision since it does not wish to limit their pricing.
39. The Commission considers it necessary to retain its powers under subsection 27(3) of the Act with respect to compliance with powers and duties not forborne from in this Decision.

Section 29

40. Section 29 of the Act provides:

29. No Canadian carrier shall, without the prior approval of the Commission, give effect to any agreement or arrangement, whether oral or written, with another telecommunications common carrier respecting

(a) the interchange of telecommunications by means of their telecommunications facilities;

(b) the management or operation of either or both of their facilities or any other facilities with which either or both are connected; or

(c) the apportionment of rates or revenues between the carriers.

41. The Commission considers it appropriate to forbear from the exercise of its powers and the performance of its duties under section 29 of the Act in respect to the routes forborne from in this Decision in the following manner:

- Consistent with Decision 2004-80, Aliant Telecom, Bell Canada, MTS Allstream and SaskTel are not required to obtain approval of agreements related to IXPL services provided on forborne IXPL routes; and
- Consistent with Decision 2003-77, TCI is not required to obtain approval of agreements related to IXPL services provided on forborne IXPL routes when operating as an ILEC in British Columbia and Alberta. However, as the scope of forbearance for TCQ's IXPL routes was determined in Order 99-905 to be the same as in Decision 97-20 (in which the Commission did not forbear from the exercise of its powers and the performance of its duties under section 29 of the Act), TCI is required to obtain approval of agreements related to IXPL services provided on forborne IXPL routes when operating as an ILEC in the territory of the former TCQ.

Section 31

42. Section 31 of the Act provides:

31. No limitation of a Canadian carrier's liability in respect of a telecommunications service is effective unless it has been authorized or prescribed by the Commission.

43. The Commission considers it appropriate that the affected ILECs be able to limit their liability, without regulatory approval, with respect to the provision of the forborne IXPL services on the routes listed in the Appendix. Any provision limiting liability in existing contracts or arrangements will continue to remain in force until their expiry. A contract or arrangement will be deemed to terminate on the date or in the manner provided therein as of the date of this Decision, notwithstanding extensions provided for therein.

Declaration pursuant to subsection 34(4) of the Act

44. In light of the above, the Commission declares, pursuant to subsection 34(4) of the Act, that sections 24, 25, 27, 29 and 31 of the Act do not apply to the affected ILECs' IXPL services on the routes identified in the Appendix, except with respect to:

- the conditions pursuant to section 24 of the Act set out in this Decision with respect to the confidentiality of customer information;

- any future condition that the Commission may impose, pursuant to section 24 of the Act;
- subsection 27(3) of the Act with respect to compliance with powers and duties not forborne from in this Decision; and
- section 29 of the Act with respect to the provision by TCI of IXPL services on forborne IXPL routes in the territory of TCQ.

Tariff filings

45. The Commission directs the affected ILECs to issue, forthwith, tariff pages removing the tariffs for the IXPL services on the routes identified in the Appendix, effective on the date of issuance of the tariff pages.

Secretary General

This document is available in alternative format upon request, and may also be examined in PDF format or in HTML at the following Internet site: <http://www.crtc.gc.ca>

***New IXPL routes that qualify for forbearance based on the April 2005 reports
from competitors pursuant to Order 99-434***

<i>ILEC A</i>	<i>Exchange A</i>	<i>Exchange B</i>	<i>ILEC B</i>
Bell Canada	Belleville, ON	Black Rock, NY (Bor. Crossing)	Bell Canada
Bell Canada	Belleville, ON	Blaine (Bor. Crossing)	TCI
Bell Canada	Brampton, ON	Belleville, ON	Bell Canada
Bell Canada	Brantford, ON	Unionville, ON	Bell Canada
Bell Canada	Buffalo, NY (Bor. Crossing)	Alburg, VT (Bor. Crossing)	Bell Canada
Bell Canada	Buffalo, NY (Bor. Crossing)	Blaine (Bor. Crossing)	TCI
Bell Canada	Chicoutimi, QC	Toronto, ON	Bell Canada
Bell Canada	Desbarats, ON	Espanola, ON	Bell Canada
Bell Canada	Desbarats, ON	Temiscaming, ON	Bell Canada
Bell Canada	Desbarats, ON	Thessalon, ON	Bell Canada
Bell Canada	Detroit (Bor. Cr)	Kitchener, ON	Bell Canada
Bell Canada	Detroit (Bor. Cr)	Streetsville, ON	Bell Canada
Bell Canada	Drummondville, QC	Ste-Marie-De-Beauce, QC	TCI
Bell Canada	Espanola, ON	Temiscaming, ON	Bell Canada
Bell Canada	Espanola, ON	Thessalon, ON	Bell Canada
Bell Canada	Kitchener, ON	Breslau, ON	Bell Canada
Bell Canada	Kitchener, ON	Galt, ON	Bell Canada
Bell Canada	Kitchener, ON	Hespeler, ON	Bell Canada
Bell Canada	La Prairie, QC	Montréal, QC	Bell Canada
Bell Canada	Lévis, QC	Ste-Marie-De-Beauce, QC	TCI
Bell Canada	Lorretteville, QC	Montréal, QC	Bell Canada
Bell Canada	Lorretteville, QC	Québec, QC	Bell Canada
Bell Canada	Lorretteville, QC	Rivière-du-Loup, QC	Bell Canada
Bell Canada	Mont-Joli, QC	Montréal, QC	Bell Canada
Bell Canada	Mont-Joli, QC	Québec, QC	Bell Canada
Bell Canada	Montréal, QC	La Prairie, QC	Bell Canada
Bell Canada	Montréal, QC	Mont-Joli, QC	Bell Canada
Bell Canada	North Bay, ON	Desbarats, ON	Bell Canada
Bell Canada	North Bay, ON	Espanola, ON	Bell Canada
Bell Canada	North Bay, ON	Temiscaming, ON	Bell Canada
Bell Canada	North Bay, ON	Thessalon, ON	Bell Canada
Bell Canada	Peterborough, ON	Toronto, ON	Bell Canada

***New IXPL routes that qualify for forbearance based on the April 2005 reports
from competitors pursuant to Order 99-434***

<i>ILEC A</i>	<i>Exchange A</i>	<i>Exchange B</i>	<i>ILEC B</i>
Bell Canada	Pointe Claire, QC	Québec, QC	Bell Canada
Bell Canada	Pointe Claire, QC	Sherbrooke, QC	Bell Canada
Bell Canada	Pointe Claire, QC	St-Lambert , QC	Bell Canada
Bell Canada	Pointe Claire, QC	Trois-Rivières, QC	Bell Canada
Bell Canada	Pont Viau, QC	Pointe Claire, QC	Bell Canada
Bell Canada	Preston, ON	Galt, ON	Bell Canada
Bell Canada	Sault Ste. Marie, ON	Desbarats, ON	Bell Canada
Bell Canada	Sault Ste. Marie, ON	Espanola, ON	Bell Canada
Bell Canada	Sault Ste. Marie, ON	Temiscaming, ON	Bell Canada
Bell Canada	Sault Ste. Marie, ON	Thessalon, ON	Bell Canada
Bell Canada	Sault Ste. Marie, ON	Toronto, ON	Bell Canada
Bell Canada	Sault Ste. Marie, ON	Utopia, ON	Bell Canada
Bell Canada	Sherbrooke, QC	Ste-Marie-De-Beauce, QC	TCI
Bell Canada	Sudbury, ON	Desbarats, ON	Bell Canada
Bell Canada	Sudbury, ON	Espanola, ON	Bell Canada
Bell Canada	Sudbury, ON	Temiscaming, ON	Bell Canada
Bell Canada	Sudbury, ON	Thessalon, ON	Bell Canada
Bell Canada	Thessalon, ON	Temiscaming, ON	Bell Canada
Bell Canada	Unionville, ON	Vancouver, BC	TCI
Cochrane, ON PUC	Cochrane, ON	Desbarats, ON	Bell Canada
Cochrane, ON PUC	Cochrane, ON	Espanola, ON	Bell Canada
Cochrane, ON PUC	Cochrane, ON	Temiscaming, ON	Bell Canada
Cochrane, ON PUC	Cochrane, ON	Thessalon, ON	Bell Canada
SaskTel	Regina, SK	Sooke, BC	TCI
SaskTel	Regina, SK	Sydney, BC	TCI
SaskTel	Saskatoon, SK	Sooke, BC	TCI
SaskTel	Saskatoon, SK	Sydney, BC	TCI
TCI	Abbotsford, AB	Courtenay, BC	TCI
TCI	Abbotsford, AB	Duncan, BC	TCI
TCI	Abbotsford, AB	Parksville, BC	TCI
TCI	Abbotsford, AB	Sooke, BC	TCI

*New IXPL routes that qualify for forbearance based on the April 2005 reports
from competitors pursuant to Order 99-434*

<i>ILEC A</i>	<i>Exchange A</i>	<i>Exchange B</i>	<i>ILEC B</i>
TCI	Abbotsford, AB	Sydney, BC	TCI
TCI	Airdrie, AB	Courtenay, BC	TCI
TCI	Airdrie, AB	Duncan, BC	TCI
TCI	Airdrie, AB	Parksville, BC	TCI
TCI	Airdrie, AB	Sooke, BC	TCI
TCI	Airdrie, AB	Sydney, BC	TCI
TCI	Brooks, AB	Courtenay, BC	TCI
TCI	Brooks, AB	Duncan, BC	TCI
TCI	Brooks, AB	Parksville, BC	TCI
TCI	Brooks, AB	Sooke, BC	TCI
TCI	Brooks, AB	Sydney, BC	TCI
TCI	Calgary, AB	Courtenay, BC	TCI
TCI	Calgary, AB	Duncan, BC	TCI
TCI	Calgary, AB	Parksville, BC	TCI
TCI	Calgary, AB	Sooke, BC	TCI
TCI	Calgary, AB	Sydney, BC	TCI
TCI	Calgary, AB	Toronto, ON	Bell Canada
TCI	Calgary, AB	Toronto, ON	Bell Canada
TCI	Camrose, AB	Courtenay, BC	TCI
TCI	Camrose, AB	Duncan, BC	TCI
TCI	Camrose, AB	Parksville, BC	TCI
TCI	Camrose, AB	Sooke, BC	TCI
TCI	Camrose, AB	Sydney, BC	TCI
TCI	Chilliwack, BC	Courtenay, BC	TCI
TCI	Chilliwack, BC	Duncan, BC	TCI
TCI	Chilliwack, BC	Parksville, BC	TCI
TCI	Chilliwack, BC	Sooke, BC	TCI
TCI	Chilliwack, BC	Sydney, BC	TCI
TCI	Courtenay, BC	Duncan, BC	TCI
TCI	Courtenay, BC	Edmonton, AB	TCI
TCI	Courtenay, BC	Ft. McMurray, AB	TCI
TCI	Courtenay, BC	Grande Prairie, AB	TCI

*New IXPL routes that qualify for forbearance based on the April 2005 reports
from competitors pursuant to Order 99-434*

<i>ILEC A</i>	<i>Exchange A</i>	<i>Exchange B</i>	<i>ILEC B</i>
TCI	Courtenay, BC	High River, AB	TCI
TCI	Courtenay, BC	Kamloops, BC	TCI
TCI	Courtenay, BC	Kelowna, BC	TCI
TCI	Courtenay, BC	Leduc, AB	TCI
TCI	Courtenay, BC	Lethbridge, AB	TCI
TCI	Courtenay, BC	Medicine Hat, AB	TCI
TCI	Courtenay, BC	Nanaimo, BC	TCI
TCI	Courtenay, BC	New Westminster, BC	TCI
TCI	Courtenay, BC	Newton, BC	TCI
TCI	Courtenay, BC	Parksville, BC	TCI
TCI	Courtenay, BC	Penticton, BC	TCI
TCI	Courtenay, BC	Prince George, BC	TCI
TCI	Courtenay, BC	Red Deer, AB	TCI
TCI	Courtenay, BC	Regina, SK	SaskTel
TCI	Courtenay, BC	Richmond, BC	TCI
TCI	Courtenay, BC	Saskatoon, SK	SaskTel
TCI	Courtenay, BC	Sherwood Park, AB	TCI
TCI	Courtenay, BC	Sooke, BC	TCI
TCI	Courtenay, BC	Spruce Grove, AB	TCI
TCI	Courtenay, BC	St. Albert, AB	TCI
TCI	Courtenay, BC	Strathmore, AB	TCI
TCI	Courtenay, BC	Sydney, BC	TCI
TCI	Courtenay, BC	Vancouver, BC	TCI
TCI	Courtenay, BC	Vernon, BC	TCI
TCI	Courtenay, BC	Victoria, BC	TCI
TCI	Courtenay, BC	Wetaskiwin, AB	TCI
TCI	Courtenay, BC	Whitecourt, AB	TCI
TCI	Courtenay, BC	Winnipeg, MB	MTS
TCI	Duncan, BC	Edmonton, AB	TCI
TCI	Duncan, BC	Ft. McMurray, AB	TCI
TCI	Duncan, BC	Grande Prairie, AB	TCI

*New IXPL routes that qualify for forbearance based on the April 2005 reports
from competitors pursuant to Order 99-434*

<i>ILEC A</i>	<i>Exchange A</i>	<i>Exchange B</i>	<i>ILEC B</i>
TCI	Duncan, BC	High River, AB	TCI
TCI	Duncan, BC	Kamloops, BC	TCI
TCI	Duncan, BC	Kelowna, BC	TCI
TCI	Duncan, BC	Leduc, AB	TCI
TCI	Duncan, BC	Lethbridge, AB	TCI
TCI	Duncan, BC	Medicine Hat, AB	TCI
TCI	Duncan, BC	Nanaimo, BC	TCI
TCI	Duncan, BC	New Westminster, BC	TCI
TCI	Duncan, BC	Newton, BC	TCI
TCI	Duncan, BC	Parksville, BC	TCI
TCI	Duncan, BC	Penticton, BC	TCI
TCI	Duncan, BC	Prince George, BC	TCI
TCI	Duncan, BC	Red Deer, AB	TCI
TCI	Duncan, BC	Regina, SK	SaskTel
TCI	Duncan, BC	Richmond, BC	TCI
TCI	Duncan, BC	Saskatoon, SK	SaskTel
TCI	Duncan, BC	Sherwood Park, AB	TCI
TCI	Duncan, BC	Sooke, BC	TCI
TCI	Duncan, BC	Spruce Grove, AB	TCI
TCI	Duncan, BC	St. Albert, AB	TCI
TCI	Duncan, BC	Strathmore, AB	TCI
TCI	Duncan, BC	Sydney, BC	TCI
TCI	Duncan, BC	Vernon, BC	TCI
TCI	Duncan, BC	Victoria, BC	TCI
TCI	Duncan, BC	Wetaskiwin, AB	TCI
TCI	Duncan, BC	Whitecourt, AB	TCI
TCI	Duncan, BC	Winnipeg, MB	MTS
TCI	Edmonton, AB	Parksville, BC	TCI
TCI	Edmonton, AB	Sooke, BC	TCI
TCI	Edmonton, AB	Sydney, BC	TCI
TCI	Edmonton, AB	Unionville, ON	Bell Canada

*New IXPL routes that qualify for forbearance based on the April 2005 reports
from competitors pursuant to Order 99-434*

<i>ILEC A</i>	<i>Exchange A</i>	<i>Exchange B</i>	<i>ILEC B</i>
TCI	Ft. McMurray, AB	Parksville, BC	TCI
TCI	Ft. McMurray, AB	Sooke, BC	TCI
TCI	Ft. McMurray, AB	Sydney, BC	TCI
TCI	Grande Prairie, AB	Parksville, BC	TCI
TCI	Grande Prairie, AB	Sooke, BC	TCI
TCI	Grande Prairie, AB	Sydney, BC	TCI
TCI	High River, AB	Parksville, BC	TCI
TCI	High River, AB	Sooke, BC	TCI
TCI	High River, AB	Sydney, BC	TCI
TCI	Kamloops, BC	Parksville, BC	TCI
TCI	Kamloops, BC	Sooke, BC	TCI
TCI	Kamloops, BC	Sydney, BC	TCI
TCI	Kelowna, BC	Parksville, BC	TCI
TCI	Kelowna, BC	Sooke, BC	TCI
TCI	Kelowna, BC	Sydney, BC	TCI
TCI	Leduc, AB	Parksville, BC	TCI
TCI	Leduc, AB	Sooke, BC	TCI
TCI	Leduc, AB	Sydney, BC	TCI
TCI	Lethbridge, AB	Parksville, BC	TCI
TCI	Lethbridge, AB	Sooke, BC	TCI
TCI	Lethbridge, AB	Sydney, BC	TCI
TCI	Medicine Hat, AB	Parksville, BC	TCI
TCI	Medicine Hat, AB	Sooke, BC	TCI
TCI	Medicine Hat, AB	Sydney, BC	TCI
TCI	Nanaimo, BC	Sooke, BC	TCI
TCI	Nanaimo, BC	Sydney, BC	TCI
TCI	Nanaimo, BC	Vernon, BC	TCI
TCI	New Westminster, BC	Parksville, BC	TCI
TCI	New Westminster, BC	Sooke, BC	TCI
TCI	New Westminster, BC	Sydney, BC	TCI
TCI	Newton, BC	Parksville, BC	TCI

*New IXPL routes that qualify for forbearance based on the April 2005 reports
from competitors pursuant to Order 99-434*

<i>ILEC A</i>	<i>Exchange A</i>	<i>Exchange B</i>	<i>ILEC B</i>
TCI	Newton, BC	Sooke, BC	TCI
TCI	Newton, BC	Sydney, BC	TCI
TCI	Parksville, BC	Penticton, BC	TCI
TCI	Parksville, BC	Prince George, BC	TCI
TCI	Parksville, BC	Red Deer, AB	TCI
TCI	Parksville, BC	Regina, SK	SaskTel
TCI	Parksville, BC	Richmond, BC	TCI
TCI	Parksville, BC	Saskatoon, SK	SaskTel
TCI	Parksville, BC	Sherwood Park, AB	TCI
TCI	Parksville, BC	Sooke, BC	TCI
TCI	Parksville, BC	Spruce Grove, AB	TCI
TCI	Parksville, BC	St. Albert, AB	TCI
TCI	Parksville, BC	Strathmore, AB	TCI
TCI	Parksville, BC	Sydney, BC	TCI
TCI	Parksville, BC	Vancouver, BC	TCI
TCI	Parksville, BC	Vernon, BC	TCI
TCI	Parksville, BC	Victoria, BC	TCI
TCI	Parksville, BC	Wetaskiwin, AB	TCI
TCI	Parksville, BC	Whitecourt, AB	TCI
TCI	Parksville, BC	Winnipeg, MB	MTS
TCI	Penticton, BC	Sooke, BC	TCI
TCI	Penticton, BC	Sydney, BC	TCI
TCI	Prince George, BC	Sooke, BC	TCI
TCI	Prince George, BC	Sydney, BC	TCI
TCI	Red Deer, AB	Sooke, BC	TCI
TCI	Red Deer, AB	Sydney, BC	TCI
TCI	Richmond, BC	Sooke, BC	TCI
TCI	Richmond, BC	Sydney, BC	TCI
TCI	Sherwood Park, AB	Sooke, BC	TCI
TCI	Sherwood Park, AB	Sydney, BC	TCI
TCI	Sooke, BC	Spruce Grove, AB	TCI

*New IXPL routes that qualify for forbearance based on the April 2005 reports
from competitors pursuant to Order 99-434*

<i>ILEC A</i>	<i>Exchange A</i>	<i>Exchange B</i>	<i>ILEC B</i>
TCI	Sooke, BC	St. Albert, AB	TCI
TCI	Sooke, BC	Strathmore, AB	TCI
TCI	Sooke, BC	Sydney, BC	TCI
TCI	Sooke, BC	Vancouver, BC	TCI
TCI	Sooke, BC	Vernon, BC	TCI
TCI	Sooke, BC	Victoria, BC	TCI
TCI	Sooke, BC	Wetaskiwin, AB	TCI
TCI	Sooke, BC	Whitecourt, AB	TCI
TCI	Sooke, BC	Winnipeg, MB	MTS
TCI	Spruce Grove, AB	Sydney, BC	TCI
TCI	St. Albert, AB	Sydney, BC	TCI
TCI	Strathmore, AB	Sydney, BC	TCI
TCI	Sydney, BC	Vancouver, BC	TCI
TCI	Sydney, BC	Vernon, BC	TCI
TCI	Sydney, BC	Victoria, BC	TCI
TCI	Sydney, BC	Wetaskiwin, AB	TCI
TCI	Sydney, BC	Whitecourt, AB	TCI
TCI	Sydney, BC	Winnipeg, MB	MTS
TCI	Victoria, BC	Courtenay, BC	TCI