



Rogers Communications Partnership

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David Watt

Vice President
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[Via Access Key](#)

Mr. John Traversy
Secretary General
Canadian Radio-television and
Telecommunication Commission
Ottawa, Ontario K1A 0N2

Dear Mr. Traversy;

Subject: TNC 2013-351 Call for comments - Compensation for traffic termination when traffic volume is unbalanced

1. Rogers Communications Partnership (Rogers) submits these comments in accordance with the procedure established by the Commission in paragraph 13 of *Telecom Notice of Consultation CRTC 2013-351 Compensation for traffic termination when traffic volume is unbalanced* (TNC 2013-351).
2. Upon review of *Telecom Decision 2010-787 Bell Aliant Regional Communications, Limited Partnership and Bell Canada – Proposed revision to the treatment of imbalance traffic compensation* (TD 2010-787), Rogers would like to note the issues facing the Bell companies' at that time. Rogers is of the view that it would be appropriate to extend the compensation regime that applies in the Bell companies' ILEC operating territories to other ILECs' operating territories if the Commission is convinced ILECs are faced with the same circumstance as the Bell companies' leading to the issuance of TD 2010-787.
3. Furthermore, Rogers believes that any changes made to the regime applying to other ILECs' traffic termination should be employed equally to CLEC traffic

imbalances in that ILEC's operating territory. As the Commission noted in paragraph 5 of TNC 2013-351;

5. *In [TD 2010-787], the Commission indicated that this revised compensation regime should apply symmetrically to traffic flowing both from the Bell companies to CLECs and from CLECs to the Bell companies, and only in the Bell companies' ILEC operating territories.*

4. By issuing the ruling in TD 2010-787 the Commission exercised its powers and performed its duties with respect to the policy objective set out in paragraph 7 (c) of the Act. The Commission should persist in enhancing the efficiency and competitiveness of Canadian telecommunications at a national level by continuing to make any changes to the ILECs' compensation regime applicable to all traffic between a CLEC and an ILEC's operating territories. Rogers believes that any changes to ILECs' tariffs for traffic imbalance should coincide with congruent changes to the CLEC model tariff to ensure the ongoing competitiveness of both CLEC and ILEC operations in Canada.

Yours very truly,



David Watt
Vice President
Regulatory Telecommunications

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