



December 12, 2014

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

**Re: Telecom Notice of Consultation CRTC 2013-551; Review of wholesale services
and associated policies (TNC 2013-551) – Shaw Undertaking
File: 8663-C12-201313601**

Dear Mr. Traversy:

1. Please find attached Shaw's Undertaking response further to our appearance at the public oral hearing for Telecom Notice of Consultation CRTC 2013-551. The Undertaking is found at line 5941 of the Hearing transcripts for 28 November 2014.
2. In accordance with section 39 of the *Telecommunications Act*, certain information provided herein is submitted in confidence with the Commission. This information is consistently treated as confidential by Shaw and release of the information on the public record would provide existing and potential competitors with invaluable confidential information associated with Shaw's wholesale services demand and revenues that would not otherwise be available to them. This information could be used by such parties to develop more effective marketing and business strategies which could cause Shaw specific direct harm. We further note that the Commission has previously upheld confidentiality for this information. An abridged version of the filing is being provided for placement on the public record.

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3. If you have any questions or concerns regarding this matter please contact Esther Snow, Manager, Regulatory Affairs at (250) 417-3885 or at Esther.Snow@sjrb.ca.

Yours truly,

Shaw Cablesystems G.P.

Esther Snow
Manager, Regulatory Affairs

cc: Interested Parties

Abridged

Undertaking: COMMISSIONER MENZIES: Would you mind providing us with data in terms of how that wholesale market has grown?

Response:

As illustrated by Table 5.6.2 of the Communications Monitoring Report 2014, wholesale telecommunications revenues for wireline non-voice services have grown by 2.5% since 2009. This growth is especially prevalent in new data services such as Ethernet and Internet Protocol (IP) which accounted for growth of 5.6% and 15.9% respectively since 2009.

As shown in our responses to interrogatories Shaw(CRTC)31July2014-5 and 11, Shaw has experienced tremendous growth in its wholesale division since 2009. This growth includes an ###% increase in forborne Ethernet revenues reflecting not only increased demand for competitive fibre based services, but the increasingly competitive nature of the market overall following Commission forbearance of access to ILEC Ethernet facilities.

The growth in the wholesale market is not solely reflected in an increase of wholesale revenue but is also evident by the growth in wholesale customers. As evidence by our response to Shaw(CRTC)31July2014-5, Shaw has experienced a significant increase in the number of wholesale customers purchasing competitive services from Shaw. For example, in 2008, prior to the provision of Shaw's aggregated TPIA service, Shaw had ## TPIA customer. By the end of 2013, Shaw had ## TPIA customers and today Shaw has ## TPIA customers. Our response to Shaw(CRTC)31July2014-5 also contains evidence of significant wholesale consumer demand for forborne wholesale services, especially, with respect to data and IP based wholesale offerings.

This combined growth in both revenues and the customer base, is compelling evidence of an increasingly competitive and vibrant wholesale market in Canada.