



September 6, 2017

ABRIDGED

Ms. Danielle May-Cuconato
Secretary General
Canadian Radio-Television and
Telecommunications Commission
Ottawa, Ontario
K1A 0N2

Re: Telecom Notice of Consultation CRTC 2017-49; *Review of the competitor quality of service regime* – Shaw Supplemental Comments
File: 1011-NOC2017-0049

Dear Ms. May-Cuconato:

1. In accordance with the procedures set out in paragraph 24 of Telecom Notice of Consultation CRTC 2017-49; *Review of the competitor quality of service regime* (**TNC 2017-49**), as amended, Shaw Cablesystems G.P. (**Shaw**) hereby submits these supplementary comments to the joint comments of Bragg Communications Inc., operating as Eastlink ("Eastlink"), Cogeco Communications Inc., on behalf of its affiliate Cogeco Connexion Inc. ("Cogeco"), Quebecor Media Inc., on behalf of its affiliate Videotron G.P. ("Videotron"), Rogers Communications Canada Inc. ("Rogers"), and Shaw dated September 6, 2017, filed under separate cover.
2. In these supplemental comments, Shaw responds to evidence submitted by the Canadian Network Operators Consortium (**CNOC**) and Teksavvy Solutions Inc. (**Teksavvy**) related to Shaw's wholesale high speed access (**WHSA**) service intervals.¹ Shaw has carefully

¹ See CNOC(CRTC)24May17-2 and Teksavvy(CRTC)24May17-1 filed with the Commission on July 5, 2017 in TNC - 2017-49.

reviewed the information provided by CNOC and Teksavvy and is pleased to provide its response.

CNOC Evidence

3. CNOC filed information collected from two of its members who purchase Shaw's WHSA services – # # and # #. Unfortunately, the data provided by # # contained no corresponding information that would enable Shaw to investigate the trouble ticket response times shown in the spreadsheet. Absent this information it is impossible for Shaw to ascertain the accuracy or comment on whether the data aligns with Shaw's own records.

4. With respect to the information filed on behalf of # # the installation appointment intervals set out in the spreadsheet do not align with our own records. The cause became apparent upon reading Note 1 within the spreadsheet which states:

This is the delay from the time # # gets the order and customer circuit is installed. So it includes # # internal processing time and also is subject to date(s) customer chose for his installation which can differ greatly from the best date given by the carrier.

5. It appears that # # includes internal processing times within the service interval reported in the spreadsheet. Shaw submits that an ISP's internal processing times are not within Shaw's control and should not be taken into account when assessing whether Shaw is providing reasonable service intervals to its wholesale customers.

6. We are pleased to see # # acknowledge that wholesale end-users, as with Shaw's own retail end-users, do not always wish to receive the first available installation appointment. Customers have work, school and other daily commitments that they need to work around and quite often have preferences toward a day of the week or specific times for an in-premise appointment. These preferences do not necessarily align with the next available window. A customer's preferred date or time combined with calendar availability to meet

that preference will often result in longer interval times rendering any hypothetical “standard interval” meaningless.

7. With respect to the trouble ticket interval evidence provided by # #, only a limited number of instances within the spreadsheet contained information that Shaw could use to investigate the incident. While we acknowledge that some trouble tickets were complex and took a significant time to resolve, many of the instances provided appear to overstate the time taken to resolve the ticket. We refer to # # Note 2 on the spreadsheet which states:

This is the delay between the time a ticket was opened with the carrier and closed. As Carriers do not always get back to # # with confirmation a ticket is closed, the time stamp for closure could be when we realized ticket was closed or after a follow-up call with the customer that the problem has been resolved. Hence the overall delay may be longer than actual.

8. Based on our review of the information provided, Shaw agrees that instances of delayed or lost communication may be the cause of the differential between Shaw’s recorded ticket closure timeframes and those reported by # #. We have taken steps over the past year to improve on trouble ticket responses and will continue to work towards improving our processes so that our customers are aware of ticket closures.

Teksavvy Evidence

9. Teksavvy has provided, in confidence with the Commission and Shaw, two spreadsheets purporting to represent Shaw’s Mean, Median and Mode installation and trouble ticket intervals. Shaw has reviewed the spreadsheets in conjunction with Teksavvy’s written interrogatory responses. At the outset, we note that the information related to Shaw’s intervals appear to be in line with the combined industry results Teksavvy filed on the public record.

10. Unfortunately, Teksavvy has not provided any additional ticket or account information related to each service order or trouble ticket that would assist Shaw in reviewing or assessing the validity of the information provided. This is especially concerning as it is unclear if “when service is ordered” as described in Teksavvy’s interrogatory description refers to when an end-user contacts Teksavvy and places a service order or if it refers to when Teksavvy submits a complete and accurate WHSA service order to Shaw.² Understanding when Teksavvy commences measurement of the interval is critical to correctly assessing the data provided.
11. Regardless, Teksavvy indicates that it does not submit service orders with less than a 5 business day interval.³ When you take into consideration customer preferences, calendar availability and a 5-day standard ordering interval (that accounts for any back-and-forth communication), the Mode and Mean values reported by Teksavvy are not unreasonable and, more importantly, not entirely within Shaw’s control.
12. With respect to the trouble ticket response information supplied by Teksavvy, once again the information does not contain sufficient detail to allow for Shaw’s assessment of the data. However, we note that the spreadsheet data provided by Teksavvy entitled “Cumulative Percent of resolved within X days or less” contains resolution interval percentages that are not dissimilar from Shaw’s own data filed in response to Shaw(CNOC)24May2017-2(b). From Shaw’s perspective, this illustrates that, even when you take into consideration the additional time necessitated by WHSA processes, WHSA end-users are receiving trouble ticket resolution intervals that are consistent with Shaw’s retail customers.

² “We take service installation time to mean the interval starting when service is ordered, and ending when service is installed.” TekSavvy(CRTC)24May17-1, 5 July 2017

³ “The interval’s floor is bounded by the minimum number of days that wholesale HSA providers ordinarily require before an install order can be completed, and its ceiling is bounded by the maximum interval for which TekSavvy will accept a new service order:” TekSavvy(CRTC)24May17-1, 5 July 2017

Conclusion

13. In summary, the evidence submitted by CNOG members and Teksavvy fails demonstrate a disparity between Shaw's retail and wholesale services intervals necessary to support calls to expand the Competitor Quality of Service (**CQoS**) regime to include Shaw's WHSA service. As we stated in our initial intervention and responses to interrogatories, Shaw's in-premise appointment scheduling and trouble ticketing processes do not differentiate between WHSA and retail end-users. Therefore, no undue or unjust discrimination has occurred in the provision or support of WHSA services.
14. However, if the Commission disagrees with Shaw's arguments and proceeds with the expansion of CQoS to include TPIA services, it is critical that the quality metrics are designed in a manner that is simple to administer and does not unfairly penalize Shaw, or other carriers, by incorporating activities or timelines outside of our control.
15. Based on Shaw's assessment, if the Commission proceeds with CQoS for WHSA service, the following metrics may achieve the desired balance:
- i. Tracking of the 2 business day service order interval as set out in the TPIA End-User Service & Trouble Ticket Process Guidelines⁴;
 - ii. Tracking of the 2-day disconnection order interval as established in Broadcasting and Telecom Regulatory Policy CRTC 2014-576;
 - iii. Tracking of installation and repair appointments completed on the confirmed appointment date (excluding instances outside of Shaw's control such as Nobody Home);
 - iv. Semi-annual reporting of these limited metrics for three years commencing 12 months following release of the Commission's decision.

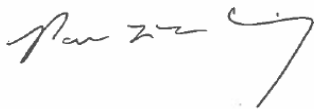
⁴ The TPIA End-User Service & Trouble Ticket Process Guidelines is a document being developed by the CISC 1540 Wholesale High-Speed Access Working Group. The document is an amalgamation and update of the discontinued Cable Access (High Speed) Working group reports HSRE003, HSRE004, HSRE009, HSRE0011 and HSRE0013 in which TPIA ordering and troubleshooting processes were originally developed.

16. While Shaw does not agree that CQoS remains appropriate in today's market, if the Commission determines that CQoS should be expanded to include WHSA services, the metrics set out above strike a balance between minimally intrusive regulation and increased transparency in mandated wholesale services.

17. We thank the Commission for the opportunity to provide comments in this proceeding.

Yours truly,

Shaw Cablesystems G.P.



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