

Appendix C
Table of Issues Raised by Rogers regarding TELUS
Construction Standards

Telecom Notice of Consultation CRTC 2020-366

Call for comments regarding potential regulatory measures to
make access to poles owned by Canadian carriers more efficient

Reply of
Rogers Communications Canada Inc.

January 19, 2020

	Section of Construction Guidelines	Comments of Rogers
1.1	The Licensee must submit applications for each use of, or connections to, Support Structures owned, controlled, connected to or managed, by the Company for additions, rearrangements, transfers, replacements or removals of the Licensee's Facilities, including any RF Transmitting Equipment located on or in the Company Support Structures ...	Comment: Pursuant to CRTC Decision 2014-77, strand-mounted wireless equipment should be excluded from the requirement to get a permit.
1.2	... Applications are not required for repair or routine maintenance works on the Licensee's Facilities, if the work will not affect location and or consume additional capacity on or in the Support Structure....	Comment: Strand-mounted wireless equipment should be excluded from the requirement to get a permit.
1.3.1	For any RF Transmitting Equipment, at the time of application, or a minimum 60 days in advance of installation, a compliant SC6 report shall be provided to the Company. The report must account for any RF transmitting equipment within 100-meter radius. Any addition of RF transmitting equipment must be preceded by an Interference Study to guarantee any interference risk.	Q: Please explain what is meant by the phrase, "Any addition of RF transmitting equipment must be preceded by an Interference Study to guarantee any interference risk." Q: What exactly is an Interference Study?
2.1	When the Licensee is using or making connections to Support Structures for additions, rearrangements, transfers, replacements or removals in or on the Company's Support Structures, the Licensee must have an approved TELUS permit at the work site. In the absence of an approved permit, Company employees shall have the authority to suspend the Licensee's work.	Comment: There should be an exception for emergency situations.
2.6	Note 4: In the event that the Licensee is granted permission to place RF transmitting equipment and associated wiring, fulltime inspection may be required. This will be identified on the design approval.	Q: What is meant by "fulltime inspection"? Q: Why does this kind of installation require fulltime inspection?
4.1	A Company employee shall have the authority to suspend the Licensee's work operations on, in or near Support Structures if, in the sole discretion of said employee, any hazardous condition arises as a result of the Licensee's work operations or any of its employees or contractors. ...	Comment: It cannot be just any "Company employee" who is granted unlimited discretion. Such employee needs to have the necessary training and expertise to ascertain a hazardous condition.

	Section of Construction Guidelines	Comments of Rogers
8.2	The Company may limit the number and size of Licensee's Facilities on or in any Support Structure due to capacity, interference or safety reasons.	Q: What exactly is meant by "interference"? This term is too vague.
11.1	Installation of Licensees' Facilities on poles jointly owned by the Company and another party, or solely by another party (i.e. a power utility), for which TELUS manages the Communications space, shall be subject to and must comply with the specifications and standards of both the other party and TELUS.	Q: Why would TELUS' Construction Standards apply to BC Hydro poles? Please provide evidence of Telus' contractual obligations that impose this requirement.
11.10	Licensee's aerial mounted equipment is to be installed in the following manner on Company only poles; jointly owned poles with BC Hydro and within Company managed communication space on a pole owned by an electric utility:	<p>Q: Do these Construction Standards permit an antenna to be placed above or below the communication space on a pole?</p> <p>Q: Does Telus control or manage manage access to spaces outside of the communications space?</p>
3	All pole-mounted Licensee RF-transmitting equipment shall be installed at a minimum 2 meters' vertical distance from any existing Company, other Licensee or joint-use owner's RF-transmitting equipment.	Comment: This provision is unacceptable, As we read it, once Telus places its own antenna on the pole, there would be no opportunity for a third party to attach its antenna. This requires further discussion to determine how more than one antenna (e.g., small cell) can exist on a single pole.
5	All strand-mounted Licensee RF-transmitting equipment shall be installed at a minimum 75 meters' horizontal distance from any Company, other Licensee or joint-use owner's RF-transmitting equipment for all existing or planned infrastructure.	Comment: This requirement seems over-reaching, if not punitive. Rogers has installed wireless equipment that is significantly closer than 75m to other wireless equipment.
6	... Each RF transmitting equipment that is installed should have a unique site ID. This site ID should be referenced in the aforementioned SC6 and interference reports .	Q: Again, what is meant by "interference report"?

	Section of Construction Guidelines	Comments of Rogers
8	No Licensee RF equipment installation wiring or cabling can pass through the 2-foot telecom space on any TELUS only poles; jointly owned poles with BC Hydro and within Company managed communication space on a pole owned by an electric utility.	Comment: This provision is unacceptable as it essentially prohibits the installation of any wireless equipment above the communication space on a pole.

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