

Northwestel Inc. P.O. Box 2727 Whitehorse, YT Y1A 4Y4

Mr. Leonard Katz
Executive Director
Canadian Radio-television and
Telecommunications Commission
OTTAWA, Ontario
K1A 0N2

JUN 3 0 2005

VERSION ÉLECTRONIQUE

30 June 2005

Dear Mr. Katz:

Re: Northwestel Inc. Tariff Notice 823

Attached for the Commission's approval are proposed revisions to Northwestel's Mobile Telephone Service Tariff (CRTC 3006), Item 201.

Northwestel is proposing to remove the Public Mobile Telephone Service ("PMTS") from the Fort Smith site in Northwest Territories.

The Company is proposing to withdraw the service from this location due to the declining subscriber base (see Attachment A) and low usage at the Fort Smith site. Attachment A demonstrates that the subscriber usage generated by Northwestel manual mobile subscribers associated with this site are negligible, has declined significantly over the past year, and does not recover the costs associated with providing and maintaining the service at this site. Attachment A also demonstrates the associated potential financial savings to Northwestel if this filing is approved. These savings would assist Northwestel in reducing its reliance on supplementary funding.

The Company notes that the cost analysis includes easily identifiable expenses related only to provisioning this service, including: operator services, and equipment maintenance. These costs alone, compared with the revenue generated, warrant removing the service at this site. See Attachment A.

Northwestel submits that removing mobile service from this site will only affect a few remaining "non-fixed subscribers", as no "fixed" customers have had service in Fort Smith since July 2004. As Northwestel demonstrates in Attachment A, there are only two calls being placed from this site per month and it is highly improbable that calling numbers would increase, as the number of PMTS customers overall has continued to decline at a considerable rate throughout 2004 and 2005.

The declining number of customers supports Northwestel's position that PMTS customers are continuing to migrate to alternative services, such as satellite and cellular. Northwestel submitted cost comparisons between PMTS, cellular and satellite service in its proposal to withdraw PMTS from five locations in northeastern British Columbia filed May 11, 2004. (Please see Northwestel's Tariff Notice 808 and corresponding CRTC approval Order 2004-298). As with the five locations previously referenced, customers have access to satellite service, and most of the Fort Smith area also has cellular coverage (see Attachments C and D). Therefore, customers have other alternatives available to them.

Moreover, due to the obsolescence of the technology and manufacturer-discontinued parts, Northwestel cannot guarantee the ability to restore PMTS service in a timely fashion, impacting the reliability of the service. In addition to the difficulties faced by Northwestel in trying to maintain this service, Northwestel expects that over time it will become increasingly difficult for customers to find replacement parts to maintain their radios. Furthermore, Manual mobile service does not provide modern calling features that alternative services provide such as voice mail and call forwarding. Therefore, the Company suggests that it may be in the long-term best interest of the customer to migrate to a more reliable and functional service.

The Company has provided a comparison of the recurring costs for Northwestel PMTS, cellular and satellite services, based on the average amount of calls made by the affected customers (see Attachment B). It is clear that for average use, satellite service is not significantly more expensive, with the added value of being able to subscribe to call management services, such as voicemail and call forwarding. The attachment also shows that cellular service is actually less expensive, even though the service is more advanced than PMTS. Furthermore, due to technological and market advances in cellular and satellite services, the initial start-up and recurring charges have been decreasing at a steady pace, making these services much more financially accessible to customers than in the past.

In summary, considering;

- 1. the costs and corresponding impact on supplementary funding from maintaining this site.
- 2. the minimal customer usage of manual mobile service and the availability of substitute services,
- 3. the quality and functionality issues with this antiquated service,

the Company proposes to withdraw PMTS service from the Fort Smith site.

Due to the specific usage patterns at these sites, timing for this proposal is critical in terms of minimizing any potential difficulty that could result from transition for affected customers. As a result, Northwestel respectfully requests an approval date of August 1, 2005 and an effective date of October 1st, 2005. This would allow the Company approximately two months to inform customers of the decision, and allow these customers adequate time for transition. As of the date of this application, Northwestel has notified all affected customers of this tariff proposal by letter, and will notify customers by way of direct letter if and when this filing is approved. A copy of the notification letter has been submitted with the current filing (see attachment E).

Pursuant to Section 39 of the Telecommunications Act, the information contained in Attachments A is submitted to the Commission in confidence. Release of this information would provide the Company's competitors with an undue competitive advantage by providing them valuable information about the market, which would permit them to establish more effective business and marketing strategies, thereby causing the Company specific direct harm. An abridged version of the Attachment A is provided for the public record.

Yours truly,

Dallas C. Yeulett Manager, Regulatory Affairs

Attachments



Mr. Leonard Katz Executive Director Canadian Radio-television and Telecommunications Commission OTTAWA, ON K1A 0N2

Dear Mr. Katz:

Re: Northwestel Inc. Tariff Notice 823

In compliance with the provisions of the *Telecommunications Act* and Section 29 of the *CRTC Telecommunications Rules of Procedure*, Northwestel Inc. applies herewith for approval of the following tariff amendments:

Tariff	Proposed Effective Date	Description
CRTC 3006	01 October 2005	8 th revised page 26

Enclosed herewith are copies of the proposed revised tariff pages and a letter of explanation for the changes requested.

Yours truly,

Dallas C. Yeulett Manager, Regulatory Affairs

Attachments

30 June 2005

PROPOSED TARIFF PAGE



Inc. MOBILE TELEPHONE SERVICE

CRTC 3006 8th Revised Page 26 Cancels 7th Revised Page 26

TN_823

MANUAL MOBILE TELEPHONE SERVICE

Item

201 MANUAL MOBILE SERVICE (cont'd)

6. Service Areas (cont'd)

A base station is associated with each Mobile Service Area as follows:

Mobile	Rate	V-H Coordinates*	Revertive	
Service Area	<u>Centre</u>	<u>V H</u>	Calling Site	
Northwest Territories				(C)
Angus				
Arrowhead				
Chick Lake	.Chick Lake			
Dixon	. Dixon			
Ebbutt	. Ebbutt			ļ
Edzo	.Edzo			
Enterprise	.Enterprise			
Fort Good Hope				
Fort Liard	.Fort Liard			
Fort Norman	. Fort Norman			-
Fort Providence	. Fort Providence			
Fort Resolution				
Fort Simpson				(D)
·	*			
Grassy	.Grassy			
Hay River				
			Y	
Little Chicago				
Morrisey	_			
Norman Wells	_			
Parsons	. Parsons			
Payne				
Pine Point	-			
Pointed Mountain				
Port Radium	.Port Radium			
Rae				
Rat Pass				
Redknife				
Saline				
Snare	. Snare			
Taglu				
Travaillant				
Tsiigehtchic				
Tuktoyaktuk				
Tungsten				
Wrigley	-			
Yellowknife				

^{*}Provided when different or not given in Tariff CRTC 3002, Item 107.

For explanation of symbols see Page 1

Issued: 30 June 2005 Effective: 01 October 2005

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		7	Jan-04	Feb-04	Mar-04	Apr-04 N	May-04	Jun-04	Jul-04	Aug-04	Sep-04	Oct-04	Nov-04	Dec-04	Jan-05	Feb-05	Mar-05	Apr-05	Total
Fixed Customers	Entire Company		4:	**	#±	**	##	#	#	#1:	#	7#	*	**	#1:	#£	7#		
	Fort Smith (Note 1) #	le 1) #	**	**	#±	**	#	72	#	# ±	**	*	#±	**	**	#	#		
Non Fixed Customers	Entire Company	*	*11:	*	#±	*#	*	**	*	#±	##	#	#1:	**	**	#	#		
		Fort Smith #	**	*	**	**	*	##	#	₩.	##	*	₩	**	**	**	*		
Total	Entire Company	* 	**	*	**	**	*	7 #	#	#±	**	#:	‡ ±	**	**	*	#		
	Fort St	Fort Smith #	##	#	#	7 11:	#	725	#	#1	**	#	# ±	**	#	##	#		
Fort Smith customers	Fort Smith customers as a percentage of total	*	*#	*	**	72:	#	7 1±	#	₩.	*#	#	#k:	*	## :	**	*		
		7	Jan-04	Feb-04	Mar-04 A	Apr-04 N	May-04 .	Jun-04	Jul-04 A	Aug-04	Sep-04	Oct-04	Nov-04	Dec-04	Jan-05	Feb-05	Mar-05	Apr-05	
Number of completed calls (Note 2)	calls (Note 2)	¥	**	72:	#	**	3 #	78	#	₩.	*#:	*	#±	**	**	##	#	**	
Number of Unique Cus	Number of Unique Customers Placing/Receiving Calis	*	##	#±	#	₩.	#	**	#	#1	**	#	#±	**	##	#	#	#	
Monthly Revenue	1	¥	##	#	**	72:	*	**	#	#1	**	#	#1	1 ‡	**	##	#±	**	
Revenue per Call		*	##	722	# ±	72:	#	**	#	#1	**	#	#	#	#	**	#	**	
Operator Expense (Note 3)	(e 3)	# ±	*	72:	**	72	#	#	#	#1	#	#	#	7#	##	**	#±	##	
Maintenance (Note 4)		¥Ł	##	*	##	7#	#	∓ ≢	#	**	##	#	##	∓ ≄	##	**	≄ ±	**	
Total Est. Expenses		#	#	7#	##:	#	#	*	*	##	722	#	**	#	#	¥#:	ŒΈ	#	
	Profit / Loss	#	**	7\$	**	#	*	*	#	**	#	#	**	#	#	#	#1:	#	
Note 1	In all of 2004, a total of # calls were made to from PMTS customers in Fort Smith. The one fixed customer in service from January to June accounted for # calls, or # of the annual total	vere mad	e to #rom [MTS custor	ners in Fort	Smith.The	ne fixed c	ustomer in	service fror	n January	to June acc	ounted for	#calls, or #	of the ann	ual total.				
Note 2	The number of 'completed' calls includes # types of originating and '	includes	s # types of	f originating	r and termin	terminating calls; PMTS to Landline, Landline to PMTS, and PMTS to PMTS	MTS to La	indline, Lar	dline to PN	ATS, and PI	ATS to PMT	ş							
Note 3	Operator Expense is calculated at \$ # /call, and takes into consideration the ratio of "attempts" vs. "completed" inherent in PMTS.	at \$# /ca	III, and take	s into consi	deration the	ratio of "att	empts" vs.	"complete	d" inherent	in PMTS.									
Note 4	Maintenance expense is estimated at # technician-days per year @ \$:	ted at # te	echnician⊸c	lays per yea	r @ \$3/day,	3 /day, with the cost spread across 12 months	st spread a	icross 12 m	onths.										
	The number of Modelhuacted DMTC cube address that have need the off	Sellber To cliber	thore that	+ positioned	a petroffe on	alad cita deranahasis 2004 and asaté 2005 has dossaces from a binh at # was mareth in Andi 2004 to ants # was mareth from Insusar to Aneil 2005. The sumbar of	2004 2004 2	od sarby 300	and and and	mean feature	40	dinom and	in Andi 20.	*200	4	from I	ling April	2005 Thom	apper of
	calls for month has decreased significantly to only # during the first	significar	tly to only	# during the	first four m	The month including the second second becomes an including the single "fixed" customer using PMTS from January to June 2004, accounted for the single "fixed" customer using PMTS from January to June 2004, accounted for the single "fixed" customer using PMTS from January to June 2004, accounted for the single "fixed" customer using PMTS from January to June 2004, accounted for the single "fixed" customer using PMTS from January to June 2004, accounted for the single "fixed" customer using PMTS from January to June 2004, accounted for the single "fixed" customer using PMTS from January to June 2004, accounted for the single "fixed" customer using PMTS from January to June 2004, accounted for the single "fixed" customer using PMTS from January to June 2004, accounted for the single "fixed" customer using PMTS from January to June 2004, accounted for the single "fixed" customer using PMTS from January to June 2004, accounted for the single "fixed" customer using PMTS from January to June 2004, accounted for the single "fixed" customer using PMTS from January to June 2004, accounted for the single property of the	5, with an	average re	venue per o	all during	hat time of	S#. The si	ngle "fixed	" customer	using PMT	S from Jan	uary to Jun	e 2004, acc	ounted for
	out of #, of # % of the total number of calls completed for the entire year. The "Tixed" customer disconnected service in June, 2004, and has not re-applied	Der or ca	is complet	ed for the ef	TILE YEAR. II	ie "tixed" ci	stomer al	sconnected	service in	June, 2004	and has n	ot re-applie	ö						

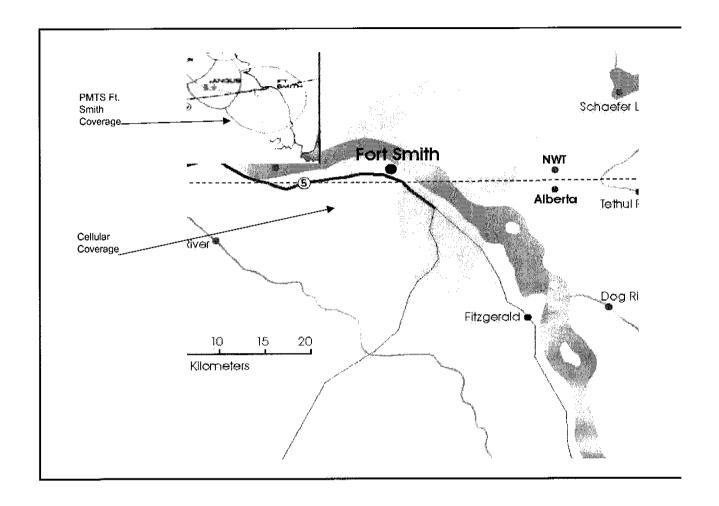
Northwestel Inc. TN 823 Attachment B 30 June 2005 Page 1 of 1

Comparison of Services

Recurring charges*	Sec. 30 Sec. 10.51		Global satellit	Har Still Committee of the Committee of	NMI cel	lular
minimum charge per month (note 1)	\$	35.00	\$	49.95		29.95
incremental cost per call (note 2)	\$	2.52	\$	7.95	\$	3.25
number of calls included in minimum charge (note 3)		0		6		6
number of calls made (note 4)	\$	2	\$	2	\$	2
cost for additional calls (note 5)	\$	5.04	\$	-	\$	_
additional fee (note 6)	\$	-	\$	6.00	\$	4.00
Total recurring cost per month	\$	40.04	\$	55.95	\$	33.95

Notes:

- 1) For Northwestel, this is the network access rate, which does not include any calls in the rate. For Globalstar and NMI, this charge includes access and minutes bundled in the rate.
- 2) For Northwestel manual mobile service, incremental cost per call is based on the average call cost to the affected customers, based on all their calls in 2004. For Globalstar, the incremental cost per call is based on the average call length (5 minutes), multiplied by the additional per minute charge (\$1.59). For NMI, again the incremental cost per call is based on the average call length (5 minutes) multiplied by the additional per minute charge, which is \$0.65.
- 3) Both NMI and Globalstar have 30 minutes included in their monthly recurring minimum bundle charge. Based on an average call length of 5 minutes, this results in 6 calls included in the minimum charge.
- 4) Based on 2004 usage, the average number of manual mobile calls made throughout 2004 by the affected customers at the site was 2 calls per month.
- 5) The reason that manual mobile service is the only service where there is an additional cost for these 2 calls is that no airtime minutes are included in the monthly rate. It should also be noted that if making calls within Canada, satellite customers would not incur long distance charges.
- 6) For Globalstar, this fee is the government license fee, and for NMI the additional monthly fee is the system access fee.





G Globalstar Gateway

- Primary Globalstar Service Area
- Extended Globalstar Service Area (Customers may have single satellite coverage and experience a weaker signal)
 - Fringe Globalstar Service Area (Customers may experience weak or sporadic signals)

Globalstar Service Area currently unavailable to North American roamers

Taken from "www.globalstar.ca"

Note that the Fort Smith site is located fully in the area covered by Globalstar satellite service

Northwestel Inc. TN 823 30 June 2005



Northwestel Inc. P.O. Box 2727 Whitehorse, YT Y1A 4Y4

Dear customer,

Due to changes in technology, the low system usage, and the obsolescence of Public Mobile Telephone Service "PMTS"), Northwestel has filed a proposal with the CRTC in order to remove PMTS at the Fort Smith site located in Northwest Territories.

Northwestel has based its decision to discontinue offering PMTS at this location on both financial and technological considerations. With the development and availability of mobile communication systems such as cellular and satellite phones, Northwestel has found that many of our PMTS customers have already migrated to these services. Given the availability of superior alternatives and the diminished customer base, Northwestel would not be in a position to recover its investments for this service without greatly increasing the rates currently charged to you.

At Northwestel, our goal is to ensure that whenever possible, our customers have access to the latest, most efficient telecommunications products and services. At times, this will mean withdrawing obsolete services because newer technologies provide less costly and more efficient solutions.

We are informing you of this proposal because our records indicate that you placed or received a PMTS call at the Fort Smith site during the period of June 2004 to May 2005.

Northwestel's proposal is available for public inspection during normal business hours at Northwestel's office and the offices of the Commission. Should you wish to comment on this application to the CRTC, please send your comments to Northwestel and the CRTC by **MONTH DAY YEAR** by letter, fax or e-mail:

Regulatory Affairs Northwestel Inc. P.O. Box 2727 Whitehorse, YT Y1A 4Y4 Fax (867) 668-7674

E-mail: regulatoryaffairs@nwtel.ca

Secretary General CRTC Ottawa, Ontario K1A 0N2 Fax (819) 953-0795

E-mail: procedure@crtc.gc.ca

Northwestel Inc. TN 823 Attachment E 30 June 2005 Page 2 of 2

The application is also available for viewing on the Internet at: http://www.crtc.gc.ca/8740/eng/2004/n1.htm and then clicking on TN 824.

If this proposal is approved by the CRTC, Northwestel will be contacting you immediately to inform you of this decision. If the application is approved, PMTS service will remain available until **MONTH DAY YEAR** so that you may have a sufficient amount of time to make other arrangements.

If you wish to obtain more information on alternate services that are available to you, please contact Northwestel Customer Services at 811.

Northwestel would like to thank you in advance for your understanding.

Sincerely Yours,

Dallas Yeulett Manager of Regulatory Affairs