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30 August 2011

Mr. Robert A. Morin  
Secretary General  
Canadian Radio-television and  
Telecommunications Commission  
Ottawa, ON K1A 0N2

Dear Mr. Morin:

**Subject: Bell Canada Tariff Notice 7323 – Intervention of TELUS CRTC File no. 8740-B2-201112102**

1. TELUS Communications Company (“TELUS”) has reviewed Bell Canada’s Tariff Notice 7323, filed on 22 August 2011, in which it proposes to introduce a new tariff item in its Special Facilities Tariff (“SFT”), namely *Item D83 – High Definition Serial Digital Channel Service* (“HD SDI SFT filing”).
2. In accordance with *Approval processes for tariff applications and intercarrier agreements*, Telecom Information Bulletin CRTC 2010-455, TELUS files its intervention in the abovementioned matter.
3. In the cover letter associated with its HD-SDI SFT filing, Bell Canada states the following :

*“[t]he proposed service is not available in the Company’s General Tariff and is being filed in the SFT due to limited anticipated demand. The Company presently has one confirmed customer for this service”<sup>1</sup>*

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<sup>1</sup> Bell Canada’s HD-SDI SFT filing, cover letter, para. 3

*“the Company is not providing a costing summary as the monthly rate, or equivalent, for this item does not exceed \$10,000.00 per month and there will be less than ten customers who will avail themselves of this service”<sup>2</sup>*

4. For the reasons explained below, TELUS requests that the Commission suspend its review, and therefore not dispose, of Bell’s HD SDI SFT filing until it issues its determinations on TELUS’ Part 1 application filed on 12 August 2011 in relation to Bell Canada’s offering of HD-SDI services absent an approved tariff (“TELUS’ Part 1 application”)<sup>3</sup>.
5. In TELUS’ Part 1 Application, TELUS requested that the Commission direct Bell Canada to file a tariff for its HD SDI services because these services are tariffable services not subject to any forbearance decision and that Bell is actively marketing and selling these services *throughout its incumbent territory* absent an approved tariff.<sup>4</sup>
6. In light of TELUS’ Part 1 Application, Bell’s SFT filing for HD SDI services is not appropriate at this time. TELUS submits that should the Commission grant the relief requested in its Part 1 Application<sup>5</sup>, a *General Tariff* filing for HD SDI, with supporting cost study, would be the appropriate solution to resolving Bell Canada’s non compliance with sections 24, 25 and 27(1) of the *Telecommunications Act*.

Yours truly,

*{Original signed by Ted Woodhead}*

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Vice-President  
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HL/ds

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<sup>2</sup> Bell Canada’s SD HDI SFT filing, cover letter, para. 4

<sup>3</sup> *Part 1 application requesting a decision on an expedited basis concerning Bell Canada’s offering and provisioning of high definition serial digital interface local video channel services in its incumbent territory absent an approved tariff*, TELUS, 12 August 2011, CRTC File no. [8661-T66-201111848](#)

<sup>4</sup> TELUS’ Part 1 Application, para. 2-3

<sup>5</sup> TELUS’ Part 1 Application, para. 28

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