

Kincardine Cable TV Ltd.

**223 Bruce Avenue,
Kincardine, ON
N2Z 2P2**

January 15, 2007

Mr. Len St-Aubin
Director General, Telecommunications Policy Branch
Industry Canada
16th Floor, 300 Slater Street
Ottawa, ON
K1A 0C8

VIA EMAIL: telecom@ic.gc.ca

Dear Sir:

Subject: Proposed Order Varying Telecom Decision CRTC 2006-15, Canada Gazette Part I, December 16, 2006 at 4312 - Comments

1. Background: Kincardine Cable TV Ltd. is a small Cable System with 5,000 subscribers and is located about 200 Km northwest of Toronto. Kincardine Cable TV Ltd. has been serving customers in the Kincardine area for over 35 years.
2. The Proposed Order Varying the above note Telecom Decision of the CRTC is completely prejudicial and anticompetitive against all competitors except the Incumbent Companies.
3. The Incumbent Telephone companies have had a monopoly on local telephone service for over one hundred years. This Proposed Order seems designed to extend this monopoly indefinitely by install anticompetitive rules that will permit the Incumbents to limit and or eliminate competitors willing to offer local telephone service in their markets.
4. I think that some facts are in order. A) In our market, there is presently no local phone competition. This is because the majority of our area is serviced by Independent Incumbent Telephone Companies and they do not have to offer local number portability. Therefore, there is **no local phone competition whatsoever.** B) If this new order changes present CRTC policy regarding competition, strengthening the incumbent company's hand there may **never be any local phone competition in our market.** C) Deleting or changing the present CRTC winback rules will be devastating for competition. I know of no industry other than the telecommunications industry where the competition has to give the incumbent company two weeks notice that they are going to

lose a customer to a competitor. Eliminating present winback rules goes beyond believable, as this will enable the incumbents to crush and destroy competition and maintain their existing monopoly position by reducing customer losses to a competitor to single digit percentages. D) Finally, we have been competing with Satellite Television providers, Star Choice and Expressvu for about nine years. These huge companies with approximately 500 times as many customers as we have, still have winback protection against our small company.

In conclusion, these proposed changes to the CRTC telephone competition policy will **not** increase competition in our market nor will it save consumers any money. I ask that a review be conducted of the facts, particularly as they apply to small markets. I am convinced that the facts will confirm that an emphasis should be placed on benefiting and assisting new local telecom providers and not the incumbent telephone companies.

Sincerely yours.

Bryan Walden

Bryan Walden,
President