

Canadian Radio-television and
Telecommunications CommissionConseil de la radiodiffusion et
des télécommunications canadiennes

Canada

**2003/05/16 - #8740-B2-200306466 - Bell Canada - TN [6752](#) -
General Tariff - PrimeLine Executive Service**

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2004/06/23 - Telecom Order CRTC [2004-201](#) The Commission approves the destandardization of PrimeLine Executive (PrimeLine), subject to the condition that Bell Canada allows current PrimeLine subscribers to make changes to their calling schedules. The Commission denies Bell Canada's application to withdraw PrimeLine. Reference: TN 6752.

2004/11/18 - Bell Canada
Description: Approved Tariff pages
Document:
[041118.pdf](#) - 134KB

2004/04/06 - Bell Canada
Description: Response to Gary Mooney's letters of March 15 & 23, 2004.
Document:
[040406.htm](#) - 11KB

2004/04/06 - Bell Canada
Description: As requested by Commission staff, the Company is providing in the attached document the in-service totals for PrimeLine Executive (PrimeLine) and Single Number Reach (SNR) services, as of the end of March 2004.
Document:
[040406.doc](#) - 55KB

2004/03/10 - Bell Canada
Description: Response to Tom Trottier's e-mail dated February 23, 2004.
Document:
[040310.htm](#) - 9KB

2003/12/18 - Bell Canada
Description: Response to Robert Smith's e-mail received December 9, 2003.
Document:
[031218.htm](#) - 7KB

2003/11/27 - Bell Canada
Description: Response to John Richardson's e-mail received November 11, 2003.
Document:
[031127.htm](#) - 5KB

2003/11/24 - Bell Canada
Description: Response to John Calvin's e-mail dated 7 November 2003.
Document:
[031124.htm](#) - 3KB

2003/11/14 - Bell Canada
Description: Bell would like to provide the following feedback.
Document:
[031114.htm](#) - 4KB

2003/11/13 - Bell Canada

Description: Bell Canada would like to provide further clarification in response to your letter dated October 21, 2003.

Document:

[031113.htm](#) - 5KB

[031113_att.doc](#) - 124KB

2003/11/10 - Bell Canada

Description: In response to Mr. Peter Hope-Tindall's e-mail dated October 31, 2003.

Document:

[031110.htm](#) - 4KB

2003/11/07 - Bell Canada

Description: In response to your letter dated October 31, 2003.

Document:

[031107.htm](#) - 4KB

2003/10/27 - Bell Canada

Description: In response to your letter dated Oct 17 we would like to provide the following clarifications.

Document:

[031027.htm](#) - 10KB

2003/10/16 - Bell Canada

Description: Please see attached Bell Canada's response to Mr. Richardson concerning comments on Single Number Reach and PrimeLine.

Document:

[031016.htm](#) - 4KB

2003/08/07 - Bell Canada

Description: In response to Tom Trottier's e-mail dated July 26, 2003, we would like to provide you with the following additional information.

Document:

[030807.htm](#) - 13KB

[top](#)

2003/07/30 - Bell Canada

Description: Reply comment to Jim Mercer, associated with TN 6751 and 6752 from Bell Canada.

Document:

[030730.htm](#) - 5KB

2003/07/24 - Bell Canada

Description: Reply comment to David Whitaker.

Document:

[030724_3.htm](#) - 4KB

2003/07/24 - Bell Canada

Description: Reply comment to Tom Trottier.

Document:

[030724_2.htm](#) - 5KB

2003/07/24 - Bell Canada

Description: Reply comment to David King.

Document:

[030724_1.htm](#) - 3KB

2003/07/24 - Bell Canada

Description: Reply comment to Jim Mercier.

Document:

[030724.htm](#) - 4KB

2003/07/14 - Bell Canada

Description: As further clarification to our July 8, 2003 submission we are pleased to provide the following additional information.

Document:

[030714.htm](#) - 3KB

2003/07/08 - Bell Canada

Description: In these reply comments, the Company provides its response to comments submitted by customers and other parties on the proposed introduction of SNR, and for the planned withdrawal of PrimeLine.

Document:

[030708.zip](#) - 155KB

2003/05/22 - Bell Canada

Description: Important information about PrimeLine Executive Service.

Document:

[030522.pdf](#) - 93 KB

[top](#)

"List of comments received by alphabetical order"

[A](#) [B](#) [C](#) [D](#) [E](#) [F](#) [G](#) [H](#) [I](#) [J](#) [K](#) [L](#) [M](#) [N](#) [O](#) [P](#) [Q](#) [R](#) [S](#) [T](#) [U](#) [V](#) [W](#) [X](#) [Y](#) [Z](#)

A

[Adams, V.](#)

[Arora, Sunil](#)

B

[Beaupré, Pierre](#)

[Bernard, J.](#)

[Bernstein, Robert](#)

[Bisaillon, Claude](#)

[Borger, Daniel T.](#)

[Bourassa, Julie](#)

[Brière, Martin](#)

[Brisland, Chris](#)

[Bruce, R.](#)

[Bruce, Robert](#)

[Bryce, Karen](#)

C

[Calvano, Phil](#)

[Calvin, John](#)

[Calvin, John_1](#)

[Calvin, John_2](#)

[Calvin, John_3](#)

[Calvin, John_4](#)

[Chassé, Louise](#)

[Chvostek, Paul](#)

[Clements, David](#)

D

[Davidson, Caroline](#)

[De Francesco, Mario](#)

[De Francesco, Mario_1](#)

[DeMarchi, George](#)
[DeMarchi, George_1](#)
[DiBennardo, Carmelo](#)
[Dion, Remi](#)
[Dishaw, Trevor](#)
[Dostie, Benoît](#)
[Drapeau, Martin](#)
[Drouin, Michel](#)

E

[Egan, Luan](#)
[Eid, Jessica L.](#)

[top](#)

F

[Fenyés, Andrew](#)
[Friesen, Carl](#)

G

[Gagnon, François](#)
[Gaulin, Madeleine](#)
[Gauthier, Bruno-Luc](#)
[Gélinas, Johanne](#)
[Gélinas, Johanne_1](#)
[Gilbert, David](#)
[Given, Bruce](#)
[Glave, Marcia](#)
[Goodwin, Elizabeth](#)
[Graf, Michael](#)
[Green, R.J.](#)
[Guérin, André](#)

H

[Hakmi, Tamouh](#)
[Hakmi, Tamouh_1](#)
[Hickman, Jim](#)
[Hope-Tindal, Peter](#)
[Hope-Tindal, Peter_1](#)
[Hope-Tindal, Peter_2](#)
[Hope-Tindal, Peter_3](#)
[Hope-Tindal, Peter_4](#)
[Hope-Tindal, Peter_5](#)
[Hope-Tindal, Peter_6](#)
[Hope-Tindal, Peter_7](#)
[Horvath, Csaba](#)
[Horvath, Csaba_1](#)
[Hughson, Joan](#)
[Huppe, Yvan](#)
[Hurley, Catherine](#)

I

[Ireson, Steve](#)

J

[Jeros, D.](#)
[Jeros, D._1](#)

K

[Kartman, Ronnie](#)
[King, David](#)
[King, David_1](#)
[Koebel, Darlene](#)
[Komjathy, Arpad](#)

L

[Lafortune, Guy](#)
[Lapierre, Yvette](#)
[Lavoie, Larry](#)
[Lepage, Sylvain](#)

[top](#)

M

[Marion, Guy](#)
[Marion, Guy_1](#)
[Martin, A.](#)
[McGarrell, Mike](#)
[McGowan, Don](#)
[Mercer, Jim](#)
[Mercer, Jim_1](#)
[Mercer, Jim_2](#)
[Mercer, Jim_3](#)
[Mercer, Jim_4](#)
[Mercer, Jim_5](#)
[Mercer, Jim_6](#)
[Mooney, Gary](#)
[Mooney, Gary_1](#)
[Mooney, Gary_2](#)
[Mooney, Gary_3](#)
[Mooney, Gary_4](#)
[Mooney, Gary_5](#)
[Mooney, Gary_6](#)
[Mooney, Gary_7](#)
[Moya, Jean-Guy](#)
[Munster, Steve](#)
[Munster, Steve_1](#)

N

[Ng, Winnifred M.](#)
[Ng, Winnifred M_1.](#)
[Ng, Winnifred M_2](#)
[Ng, Winnifred M_3](#)
[Normant, François](#)

O

[Ortona, Ross](#)

P

[Pacitto, Emilio](#)
[Palmer, Robert](#)
[Parsement, Brian](#)
[Paul, Pamela](#)
[Pettinicchi, Tony](#)
[Pinard, Gilles W.](#)
[Plante, Sylvain](#)
[Predovich, Robert D.](#)
[Predovich, Robert D_1](#)

[Predovich, Robert D. 2](#)
[Presement, Brian](#)
[Pritchard, Bob](#)
[Pritchard, Bob 1](#)
[Pritchard, Bob 2](#)
[Pritchard, Bob 3](#)

R

[Richardson, John](#)
[Richardson, John 1](#)
[Richardson, John 2](#)
[Richardson, John 3](#)
[Richardson, John 4](#)

S

[Satov, Mitchell](#)
[Saul, Robert](#)
[Sédillot, Louis](#)
[Sekla, Sabry](#)
[Silverman, Peter A.](#)
[Smith, Robert](#)
[Smith, Robert 1](#)
[Smith, Robert 2](#)
[Solursh, Gerry](#)
[Solursh, Gerry 1](#)
[Springer, Ellie](#)

[top](#)

T

[Taylor, Peter](#)
[Tremblay, Normand](#)
[Tremblay, Normand 1](#)
[Tremblay, Normand 2](#)
[Tremblay, Normand 2_att](#)
[Tremblay, Normand 2_att2](#)
[Trottier, Tom](#)
[Trottier, Tom 1](#)
[Trottier, Tom 2](#)
[Trottier, Tom 3](#)
[Trottier, Tom 4](#)
[Trottier, Tom 5](#)
[Trottier, Tom 6](#)
[Trottier, Tom 7](#)
[Trottier, Tom 8](#)
[Trottier, Tom 9](#)
[Trottier, Tom 10](#)
[Trottier, Tom 11](#)
[Trottier, Tom 12](#)
[Trottier, Tom 13](#)
[Trottier, Tom 14](#)
[Trottier, Tom 15](#)

V

[Vachon, Pierre](#)
[Varma, Seema](#)
[Vincent, Julie A.](#)

W

[Wallace, Josh](#)
[Wallace, Josh_1](#)
[Warman, Frank](#)
[Warman, Frank_1](#)
[Whitaker, Dave](#)
[Whitaker, Dave_1](#)
[Whitaker, Dave_2](#)
[Whitaker, Dave_3](#)
[Whitaker, Dave_4](#)
[Whitaker, Dave_5](#)
[White, David](#)
[Wolman, Tony](#)
[Wolman, Tony_1](#)

Z

[Zaidman, Jakov](#)
[Zaidman, Jakov_1](#)

Date Modified: 2004-12-23



Telecom Order CRTC 2004-201

Ottawa, 23 June 2004

Bell Canada

Reference: Tariff Notice [6752](#)

PrimeLine Executive service

*The Commission **approves** the destandardization of PrimeLine Executive (PrimeLine), subject to the condition that Bell Canada allows current PrimeLine subscribers to make changes to their calling schedules. The Commission **denies** Bell Canada's application to withdraw PrimeLine.*

1. The Commission received an application by Bell Canada, dated 16 May 2003, proposing to destandardize PrimeLine Executive (PrimeLine) and subsequently, to withdraw the service. PrimeLine is a network-based service that provides users with the capability to be reached and to manage their communications from any location.
2. Coincident with Tariff Notice (TN) 6752, Bell Canada filed TN 6751, proposing to introduce Single Number Reach (SNR) with an effective date of 30 July 2003. SNR is also a network-based service, which provides customers with a virtual telephone number that they can program to forward calls regardless of where they are located. Additionally, it can send a message to a customer location while the customer is on the Internet, indicating that a call is waiting. In TN 6752, Bell Canada proposed that the destandardization of PrimeLine be made effective 30 July 2003, so as to coincide with the introduction of SNR. Bell Canada also proposed to migrate PrimeLine subscribers to SNR over a 16-20 week period and, once PrimeLine customers were migrated to SNR, to withdraw PrimeLine by 31 December 2003. Bell Canada indicated that it would notify its current PrimeLine subscribers of its proposal by letter to be posted by 21 May 2003.
3. In Telecom Order CRTC [2003-365](#), 8 September 2003 (Order [2003-365](#)), the Commission approved Bell Canada's proposal to introduce SNR.
4. The Commission received comments from a number of PrimeLine subscribers, both before and after the approval of SNR.
5. Bell Canada filed reply comments, dated 8 July 2003, responding to subscribers' comments in general and subsequently filed its individual replies to particular subscribers' comments.
6. In response to a Commission staff request, Bell Canada filed a letter on 2 April 2004, providing the in-service totals for PrimeLine and SNR as of the end of March 2004.

The application

7. Bell Canada submitted that SNR would provide and enhance the majority of the feature functionalities associated with PrimeLine and stated that SNR would be available in the same localities as PrimeLine. Bell Canada stated that PrimeLine customers migrating to SNR would be able to keep their current PrimeLine numbers. Further, Bell Canada stated that as there would be no service charges for new subscribers to SNR, PrimeLine customers would not have to pay service charges to migrate to SNR.

8. Bell Canada stated that SNR would offer more features than PrimeLine, including Speech Recognition, Web Interface, Multiple Call Flows, Call Screening with Intercept, Filtering, Wake-up and 4-way Conferencing, and added that certain PrimeLine features would be enhanced in SNR. Bell Canada further stated that PrimeLine had four main features that were provided in a different manner with SNR: Call Attendant, Call Director, Executive Messaging and Pager Connection.
9. Bell Canada stated that, in general, customers would not experience an increase in rates when migrating from PrimeLine to SNR. Bell Canada indicated that some customers would experience a decrease in rates, in that they would be able to choose between two versions of SNR, one being more feature-rich than the other.
10. Bell Canada submitted that SNR Call Director feature would provide the functionality of both PrimeLine Call Director and PrimeLine Call Attendant for \$5.95 per month, only marginally higher than the rate for PrimeLine Call Director at \$4.95 per month.

Position of parties

Subscribers' comments

11. Generally, those PrimeLine subscribers who submitted comments prior to the approval of SNR sought reassurance that all the features of PrimeLine would be available with SNR. Several subscribers were concerned by the inability to place overseas calls in SNR. Some subscribers strongly opposed Bell Canada's plan to discontinue PrimeLine. A few subscribers expressed concern over the lack of functionality in SNR to enable information lines or "audio on demand" or "cascade call greeting" (collectively, information lines) submitting that SNR did not have memory locations that could be used to provide these information lines.
12. Following the approval and introduction of SNR, the Commission continued to receive comments from PrimeLine subscribers, including some from customers who had migrated to SNR. Some subscribers reiterated the concerns expressed in previous comments, while others described specific problems that they experienced in migrating to SNR.

Bell Canada's reply comments

13. With respect to the comments filed prior to the approval of SNR, Bell Canada noted that several subscribers had simply requested a copy of the filing or additional product information, without expressing an opinion on the filings. Bell Canada submitted that concerns raised in its customers' comments arose largely from a lack of understanding about the functionality of the PrimeLine and that of the proposed SNR. Bell Canada also submitted that specifically, comments focused on whether equivalent feature functionality would be provided by SNR compared to that provided by PrimeLine and on the inability to place overseas calls with SNR.
14. In response to concerns about equivalent feature functionality, Bell Canada stated that there were three areas where functions provided with PrimeLine did not closely correspond to those functions provided with SNR: pager connection, assisted programming and the message waiting lamp.
15. Bell Canada submitted that while SNR Pager Notification would not provide the specific function of being able to connect to a holding caller, it would provide more functionality than PrimeLine Pager Connection, including Enhanced Notification and Instant Call Back options.
16. Bell Canada stated that none of its customers objected to the elimination of company assisted programming. Bell Canada stated that with PrimeLine, any complex programming, such as setting up the user profile or making a change to a schedule, could only be

accomplished with the assistance of a company agent, at a cost to the customer of \$12.00. Bell Canada further stated that with SNR, users could carry out those complex programming functions through the Internet and thereby avoid charges related to company assisted programming.

17. Bell Canada noted that while SNR would not have the message waiting lamp indicator, it could notify the subscriber of a message via any combination of the following media: pager, cellular, wireline, e-mail, instant messaging and Short Message Service.
18. In response to concerns regarding the inability to place overseas calls in SNR, Bell Canada stated that, as a result of the high levels of toll fraud that currently existed in relation to overseas toll calls made on PrimeLine, it had elected to prohibit overseas calling from the SNR system. Bell Canada added that customers could exit the SNR system and place overseas calls and that, with respect to long distance plans, PrimeLine customers could migrate their current long distance plan to SNR.
19. With respect to concerns regarding information lines, Bell Canada noted that only a small minority of customers used PrimeLine to provide this function. Bell Canada submitted that subscribers wanting to provide information lines could subscribe to Centrex Message Manager to obtain that functionality. Further, in response to one subscriber's comments, Bell Canada stated that SNR would not have compatible memory locations that would be required to provide information lines because SNR is Internet protocol based. Bell Canada stated that with SNR information for call routing and greetings would reside on a service node and be part of a subscriber's profile.

Commission analysis and determination

20. The Commission notes that if Bell Canada's proposal to destandardize PrimeLine were approved with the standard wording proposed by the company, PrimeLine would no longer be available for new installations, moves, rearrangements or other changes at the same or different premises.
21. The Commission also notes that Bell Canada's PrimeLine subscribers did not oppose the company's proposal to destandardize the service. However, the Commission is concerned that subscribers may not have been fully aware of the implications of destandardization and that some subscribers could be negatively affected if PrimeLine were destandardized. The assistance of Bell Canada personnel is required for subscribers wanting to make changes to their calling schedules or for other complex programming. The Commission notes that such changes would constitute a rearrangement, which would not normally be available if the service were destandardized. The Commission considers that this could significantly reduce the usefulness of the service for some PrimeLine subscribers.
22. The Commission notes that both PrimeLine and SNR are find-me/follow-me services, which allow subscribers to be reached anywhere at any time through a single access number. The Commission further notes that with both services, subscribers can carry out basic programming using the telephone but, for more complex programming, PrimeLine subscribers must pay for the assistance of Bell Canada personnel, whereas SNR subscribers can make changes using the Internet and avoid the service charges.
23. In the Commission's view, SNR is a reasonably priced service that would meet the needs of most PrimeLine subscribers. Moreover, the Commission notes that in the proceeding that led to Order [2003-365](#) Unite Communications Corporation stated that SNR overlapped with some of the services that it had been offering for some time.
24. However, the Commission is concerned by Bell Canada's proposal to withdraw PrimeLine 16-20 weeks after the destandardization of the service is approved. As previously noted, the Commission received comments from a number of PrimeLine subscribers, some of whom had migrated to SNR following its approval. The Commission notes that many of

these subscribers experienced multiple difficulties in switching to SNR.

25. The Commission notes that a very large percentage of the PrimeLine subscribers at the time that Bell Canada filed its application were still subscribing to PrimeLine as of 28 March 2004.
26. Accordingly, the Commission considers that it would be premature for the Commission to approve a date for the withdrawal of PrimeLine at this time, that is before Bell Canada can demonstrate that most PrimeLine subscribers have been smoothly and satisfactorily migrated from the service.
27. In light of the above, the Commission:
 - **approves** the destandardization of PrimeLine, subject to the condition that Bell Canada allows subscribers to make changes to their calling schedules; and
 - **denies** the withdrawal of PrimeLine.

Secretary General

This document is available in alternative format upon request and may also be examined at the following Internet site: <http://www.crtc.gc.ca>

Date Modified: 2004-06-23