

May 12, 2004

Ms. Diane Rhéaume
Secretary General
Canadian Radio-television and
Telecommunications Commission
Ottawa, Ontario
K1A 0N2

Dear Ms. Rhéaume:

Re: Telecom Public Notice CRTC 2004-1, Review and disposition of deferral accounts for the second price cap period – Request for a change in procedures

1. The Canadian Cable Television Association (CCTA) is filing this request for a change in the procedures set out in Telecom Public Notice CRTC 2004-1 (PN 2004-1). Pursuant to sections 8 (1) and 27 (a) of the Telecommunications Rules of Procedures, CCTA requests that the filing date for responses to interrogatories set out in paragraph 32 of PN 2004-1 be changed from July 7 to July 21.
2. The procedures established for PN 2004-1 provide the opportunity for parties to file submissions, address interrogatories to parties who have filed submissions and file responses to those interrogatories. The filing dates set out at paragraphs 28 and 31 of the Public Notice provide parties with five weeks from the date that submissions are filed (May 19) to address interrogatories respecting those submissions (June 23). The filing date for responses to those interrogatories, set out at paragraph 32 of PN 2004-1, provides parties in receipt of interrogatories a period of only two weeks – from June 23 to July 7 – to prepare and file responses. According to paragraph 33 of PN 2004-1, parties would then have three weeks – from July 7 to July 28 – to file requests for further responses to their interrogatories and requests for public disclosure. Parties in receipt of those requests would have one week – from July 28 to August 4 – to respond.



3. In CCTA's submission, the time allotted in the Public Notice for the preparation and filing of responses to interrogatories is relatively short. A two week period is not expected to be adequate to prepare responses to interrogatories respecting parties' proposals filed on May 19. CCTA notes, however, that the lack of time can be remedied by altering just one of the filing dates in PN 2004-1.
4. Shifting the filing date in paragraph 32 of PN 2004-1 from July 7 to July 21 would provide parties with four weeks to prepare and file responses to interrogatories (from June 23 to July 21). Parties would then have one week to consider these responses and file any requests for further responses to their interrogatories or requests for public disclosure. These time frames are more consistent with those established in previous Commission procedures. The additional time to prepare responses to interrogatories may also limit the extent to which parties find it necessary to request further responses. It also preserves the remaining filing dates of the procedures established in PN 2004-1.
5. In light of the above, CCTA requests that the Commission revise the filing date established in paragraph 32 of PN 2004-1 as follows:
 32. Responses to those interrogatories are to be filed with the Commission and served on all parties, by **21 July 2004**.
6. A machine-readable file copy of the abridged responses to interrogatories is provided to the Commission and interested parties via Internet email.

Sincerely,

Michael Hennessy

Michael Hennessy,
Acting President

cc.: Parties to Public Notice 2004-1

*****End of Document*****

