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December 3, 2004

Ms. Diane Rhéaume
Secretary General
Canadian Radio-television and
Telecommunications Commission
Ottawa, Ontario
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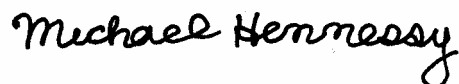
Dear Ms. Rhéaume:

Re: Public Notice 2004-1: Review and disposition of deferral accounts for second price cap period - Application of the British Columbia Old Age Pensioners' Organization et al for Costs

1. The Canadian Cable Telecommunications Association (CCTA) is in receipt of the November 29, 2004 Bell Canada (Bell) response to an application for an interim costs award filed by British Columbia Old Age Pensioners' Organization *et al* (BCOAPO), November 10, 2004, in respect of the latter's participation in Telecom Public Notice CRTC 2004-1 (PN 2004-1).
2. CCTA did not receive the application from BCOAPO and was not named by BCOAPO as a proposed respondent. CCTA did not, therefore, file comments with respect to the appropriateness of a cost award. However, in light of Bell's proposal that in the event the Commission elects to award interim costs to BCOAPO, the CCTA, among others, should be named as respondents, the CCTA wishes to submit the following comments for the Commission's consideration.
3. First, as to the matter of the appropriateness of an interim costs award for BCOAPO, CCTA concurs with Bell that the application should be dismissed. CCTA agrees that the application is premature to the extent it represents a final settlement of BCOAPO's costs and inadequate as it is unsupported by evidence of need as a precondition of continued participation.

4. As to the matter of proper respondents, CCTA submits that issues raised in the PN 2004-1 proceeding are directly related to a very specific by-product of ILEC Price Cap regulation. CCTA further notes that, given the variation among ILECs in the amount of funds in their respective deferral accounts, it is possible that there will be highly variable results between ILEC territories. It follows, therefore, that the potential impact on non-ILEC participants is far from certain. Indeed, as the proceeding is in abeyance pending receipt and consideration of Aliant proposals, it remains to be seen when and under what circumstances the dispersal of deferral account funds will ultimately be addressed. CCTA submits this fact further demonstrates that the BCOAPO application is premature.
5. In light of the above, CCTA submits that it is equally premature for the Commission to reach any conclusion as to the extent that non-ILECs might be affected by the outcome of the proceeding or establish that the degree to which, if any, that CCTA and other non-ILECs should be named as costs respondents.

Sincerely,



Michael Hennessy,
President

c.c.: Registered Interested Parties, Telecom Public Notice 2004-1

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