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August 19, 2005

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

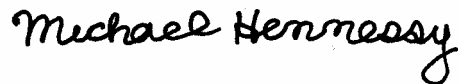
Dear Ms. Rhéaume:

Re: Public Notice 2004-1: Review and disposition of deferral accounts for second price cap period – Applications for costs by the Canadian Association of the Deaf

1. The Canadian Cable Telecommunications Association (CCTA) is in receipt of an Application for costs dated August 12, 2005 from the Canadian Association of the Deaf (CAD) in respect of its participation in Telecom Public Notice CRTC 2004-1 (PN 2004-1).
2. CCTA has no comments with respect to the appropriateness of a cost award in favour of CAD.
3. As to the matter of proper respondents, CCTA submits the ILECs should be named as sole costs respondents as the issues raised in the PN 2004-1 proceeding are directly related to a very specific by-product of ILEC Price Cap regulation and the outcomes may well have no impact on parties other than the ILECs. CCTA also notes that, given the variation among ILECs in the amount of funds in their respective deferral accounts, it is probable that there will be highly variable results between ILEC territories.
4. In Telecom Costs Order 2004-16, addressing a proceeding the purpose of which was “to determine the modifications required, if any, to certain aspects of the regulatory framework applicable to the incumbents,” the Commission considered it appropriate to name the ILECs as sole costs respondents. In CCTA’s view, the same circumstances hold in respect of PN 2004-1.

5. CCTA further notes that the Commission generally seeks to limit the number of respondents so as to limit the number of parties from whom the applicant is to collect costs (see, for example, Telecom Costs Order 2005-1). In the present case, CAD's costs amount to less than the level to which the Commission has applied this practice in the past.
6. In the event that the Commission determines that parties other than the ILECs should be named respondents, CCTA submits that the substantial majority of the costs should be allocated to the ILECs, consistent with their position in the local exchange telephony market.

Sincerely,

A handwritten signature in black ink that reads "Michael Hennessy". The signature is written in a cursive, slightly slanted style.

Michael Hennessy,
President

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

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