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November 15, 2005

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

Dear Ms. Rhéaume:

**Subject: Telecom Public Notice CRTC 2005-2, *Forbearance from regulation of local exchange services* – Answer to an Application for Costs from Public Interest Advocacy Centre (PIAC)**

1. TELUS Communications Inc. (“TELUS”) is in receipt of an application for costs from Public Interest Advocacy Centre, on behalf of the National Anti-Poverty Organization, the Consumers Association of Canada and L’Union des Consommateurs (hereinafter the “Consumer Groups”) dated November 7, 2005 filed in relation to the proceeding referenced above. Pursuant to Section 44 of the *CRTC Telecommunication Rules of Procedure* (“the Rules”). TELUS herein provides its response to the Consumer Groups’ application for costs.
2. To qualify for a cost award, an applicant must demonstrate according to section 44(1) of the Rules that they meet the following three criteria;
  - a) the applicant has, or is representative of a group or class of subscribers that has, an interest in the outcome of the proceeding of such a nature that the intervener or group or class of subscribers will receive a benefit or suffer a detriment as a result of the order or decision resulting from the proceeding;
  - b) the applicant has participated in a responsible way; and
  - c) has contributed to a better understanding of the issues by the Commission.

3. Having reviewed the summary forms for fees and disbursements, TELUS is satisfied that the costs claimed by the Consumer Groups are reasonable given the complexity of the issues that were under review in the proceeding initiated by Public Notice CRTC 2005-2, *Forbearance of local exchange services*. TELUS is satisfied that the evidence, comments and reply comments filed by the Consumer Groups were both representative of the interests of the Consumer Groups and contributed to a better understanding of the issues.
4. TELUS recommends that the respondents to the Consumer Groups' cost application include the cable companies (Rogers, Shaw, Cogeco, Eastlink and Quebecor Media Inc. [QMI]) and MTS/Allstream. TELUS notes that these parties have a significant interest in the outcome of the proceeding and participated actively in the written and oral portions of the proceeding.

TELUS further recommends that the costs be apportioned in the same manner adopted by the Commission in Telecom Cost Order 2005-2, namely that the incumbent local exchange carriers (ILEC)s and MTS/Allstream be responsible for 75% of the costs based on their telecommunication operating revenues (TORs) and the cable companies be responsible for the remaining 25%. TELUS recommends that the CCTA be responsible for 75% of the 25% to be paid by the cable companies and QMI be responsible for the balance owing by the cable companies.

Yours truly,

*{original signed by Willie Grieve}*

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Vice President  
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PJ/sa

cc: Michael Janigan, PIAC