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25 September, 2006

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

Dear Ms. Rhéaume:

Subject: Telecom Public Notice CRTC 2006-4, *Proceeding to establish a national do not call list framework and to review the telemarketing rules – Applications for Costs of the British Columbia Public Interest Advocacy Centre (BCPIAC)*

1. TELUS Communications Company (“TELUS”) is in receipt of an application for costs from the British Columbia Public Interest Advocacy Centre (BCPIAC) dated 17 July 2006 and received 15 September 2006. Pursuant to Section 44 of the *CRTC Telecommunication Rules of Procedure* (“the Rules”). TELUS herein provides its response to BCPIAC’s 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. TELUS does not object to the BCPIAC's entitlement to costs nor the quantum requested. TELUS is satisfied that the BCPIAC participated responsibly and contributed to a better understanding of the issues of persons impacted by unsolicited telemarketing calls.
4. TELUS notes that the BCPIAC did not take a position relative to the appropriate respondents of their application nor the apportionment of costs. TELUS considers that, in principle, all telemarketers should be responsible for paying the costs of organizations that represent the views of consumers. Practically speaking, however, it is neither reasonable nor appropriate to burden the BCPIAC with the administrative task of collecting their costs from a multitude of parties. Accordingly, TELUS recommends that the ILECs (including MTS/Allstream) and cable companies (such as Rogers and Shaw) and the Canadian Marketing Association (CMA) be named as respondents.
5. With respect to the appropriate apportionment of costs, TELUS recommends that the costs be apportioned equally between the ILECs, cable companies and CMA.

Yours truly,

{original signed by Willie Grieve}

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Vice President
Telecom Policy & Regulatory Affairs

PJ/cs

cc: Parties to Public Notice 2006-4
Gerry Lylyk - CRTC