



November 7, 2006

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

Dear Ms. Rhéaume:

Re: Telecom Public Notice CRTC 2006-04: Proceeding to establish a national do not call list framework and to review the telemarketing rules – Application for Costs

The Canadian Newspaper Association (CNA) is writing in support of the position of the Canadian Marketing Association (CMA) in its letter to the Canadian Radio-television and Telecommunications Commission (the Commission or CRTC) dated October 24, 2006.

We, like the CMA, fear that the Commission's policy, practice, and procedure with regards to the determination and award of costs incurred as a result of participating in the Commission's proceedings, may work to discourage not-for-profit groups from participating and contributing to important public policy debates.

In particular we are very concerned with the suggestion made by some that unregulated interveners like the Canadian Newspaper Association should bear the costs of other interveners.

This would amount to a drastic unilateral expansion of the Commission's authority and would certainly broaden the definition of "regulated company" provided by Section 2 of the *CRTC Telecommunications Rules of Procedure*. Moreover, such action could preclude the participation of many not-for-profit groups that cannot afford to incur additional costs beyond their own to participate in CRTC proceedings.

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We commend the Commission for conducting open, accessible, and public hearings on issues of regulation and policy. Such fora allow for all perspectives to be heard and considered by the Commissioners prior to rendering a regulatory decision.

In this light, it would be counter-productive for the Commission to take any action that may discourage or unfairly burden those who wish to offer their unique perspective in public debate.

With specific regard to Telecom Public Notice CRTC 2006-04, the CNA respectfully submits that neither the CMA nor any other not-for-profit organization that has contributed to this process should be assigned costs in the matter.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'D Gollob', written in a cursive style.

David Gollob
Vice President, Public Affairs
Canadian Newspaper Association
CC: All interveners