

October 13, 2021

**E-Filed**

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Your references	Our references
0360-21-R, 0482-21-R, 0487-21-R, 0489-21-R, 1239-21-R	1000313919, 1001093174

Dear Ms. Gilbert:

**Greater Toronto Sewer and Watermain Contractors Association and Labourers' International Union of North America, Local 183 – OLRB File No. 0360-21-R**

**Oshawa Area Signatory Contractors Association and Labourers' International Union of North America, Local 183 – OLRB File No. 0482-21-R**

**Greater Toronto Sewer and Watermain Contractors Association and International Union of Operating Engineers, Local 793 – OLRB File No. 0487-21-R**

**Oshawa Area Signatory Contractors Association and International Union of Operating Engineers, Local 793 – OLRB File No. 0489-21-R**

**Ontario Concrete and Drain Contractors Association and Labourers' International Union of North America, Local 183 – OLRB File No. 1239-21-R**

We represent the Ontario Concrete and Drain Contractors Association (the **OCDCA**), which is the Applicant in the accreditation application with OLRB File No. 1239-21-R (the **OCDCA Application**).

We also represent the Greater Toronto Sewer and Watermain Contractors Association (the **GTSWCA**) in the above-noted matters. The GTSWCA is the applicant in the accreditation applications with OLRB File Nos. 0360-21-R and 0487-21-R (the **GTSWCA Applications**) and is the intervenor in the Oshawa Area Signatory Contractors Association (the **OSIG**) accreditation applications with OLRB File Nos. 0482-21-R and 0489-21-R (the **OSIG Applications**).

The OCDCA Application was filed with the Board on October 5, 2021. There is considerable overlap in issues between the OCDCA Application and the GTSWCA/OSIG Applications. In particular, the OCDCA Application encompasses, amongst other areas, Board Area 9 and covers a portion of the sewers and watermains sector. Although the OCDCA/GTSWCA Applications do not overlap and, in fact, work perfectly together, there appears to be overlap with the OSIG Application.

As such, the OCDCA requested in its Application that the Board merge the OCDCA Application with the GTSWCA/OSIG Applications so that all of the related accreditation applications are heard together on the same timetable, at least initially.

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We are in receipt of the Board's decision dated October 12, 2021 (the **Decision**), in which Vice-Chair Slaughter provided direction to the parties and set out the order of proceedings for the GTSWCA/OSIG Applications. Presumably because of the timing of the OCDCA Application relative to when the Decision was being prepared, the Decision is silent with respect to the OCDCA Application.

Accordingly, we write to respectfully reiterate our request that the OCDCA Application be merged with the GTSWCA/OSIG Applications for the purposes of proceedings before the Board. In particular, we request that the OCDCA Application be added to the docket for the Board mediation scheduled for October 22, 2021, as well as that the OCDCA Application be heard alongside the GTSWCA/OSIG Applications before the Board on December 16, 2021.

Given the overlap in issues, we believe that joining the OCDCA Application with GTSWCA/OSIG Applications will streamline the proceedings and contribute to an efficient use of the Board's resources.

Yours truly,

A handwritten signature in black ink, appearing to read "Richard J. Charney".

Richard J. Charney  
RJC/SC

Copies to: David Francis, Mathews Dinsdale & Clark LLP (counsel for OASCA; via e-mail)  
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