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Via E-mail

29 September 2017

Mr. Gilles McDougall
The Secretary General
Copyright Board of Canada
56 Sparks Street, Suite 800
Ottawa, ON K1A 0C9

Dear Mr. McDougall:

Re: Public Consultations on Reforming Copyright Board of Canada

Pursuant to the filing and service of documents direction in the General Provisions section of the Model Directive on Procedure, Saskatchewan Telecommunications (SaskTel) hereby provides its written comments. The consultation calls for comments on a wide range of potential changes to the legislative and regulatory framework of the Copyright Board of Canada's (the Board) powers and procedures as well as the tariff-setting regimes more generally.

SaskTel supports the efforts by the Board to improve its efficiency and effectiveness. As a business dependent on decisions the Board makes, we strongly support Board initiatives to create processes that will allow decisions to be made and published prior to the date they become effective. Uncertainty is bad for business. We invite the Board to determine in all cases involving a previously certified tariff that the previous tariff will continue in effect until a new prospective tariff replaces it.

We invite the Board to adopt and publish Rules of Procedure that will apply to all interested parties and govern the conduct of proceedings before it. There should be a

concerted effort to increase the speed that matters are dealt with. Examples of such efforts include proposed rules that contain time limits for interested parties to act (including commencing an action for a tariff revision), introduce case management principles, standardization of requirements on document submissions, requiring additional information with objections, requiring additional explanations with proposed tariffs, simplified procedures, assigning, tracking and publishing timeframes for each case.

There is merit in the Board reviewing the legislation under which it operates and making some recommendations for change. For example, it may be beneficial for the Board to have purposes and objectives that reflect the Canadian priorities in our modern digital world to guide its deliberations.

At this point in the consultation process, SaskTel respectfully suggests that the Board draft a set of proposed reforms to the legislative and regulatory framework and submit them to the public for comment. In this way, tangible and focused proposals can be analyzed and collectively commented on resulting in systematic decision making by the Board. SaskTel eagerly anticipates reviewing proposed reforms that have been inspired by the spirit of improved efficiency and timeliness.

SaskTel appreciates the opportunity to comment on this consultation.

Sincerely,



W.N. (Bill) Beckman
Senior Director - Regulatory Affairs

DS/jb