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via mail and email

Wayne G. Wouters
Clerk of the Privy Council and Secretary to the Cabinet
Langevin Block
80 Wellington Street
Ottawa, ON K1A 0A3

Dear Mr. Wouters:

Re: **Canada Gazette, Part I, Saturday, August 9, 2014, Petition to the Governor in Council concerning Telecom Decision CRTC 2014-101 (DGTP-001-2014)**

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1. Saskatchewan Telecommunications (SaskTel or the Company) provides these comments on the petition to the Governor in Council made by The DiversityCanada Foundation (DCF) on its own behalf and on behalf of the National Pensioners and Senior Citizens Federation dated 02 June 2014. The Application seeks an order to vary Telecom Decision CRTC 2014-101 to:
 - a. Acknowledge the errors contained in Telecom Regulatory Policy 2013-271;
 - b. Nullify Section J of Telecom Regulatory Policy CRTC 2013-271;
 - c. Require the CRTC to:
 - i. hold a new hearing before a differently constituted panel on the subject of the expiration of prepaid wireless account balances within 60 days of the Order;
 - ii. allow interventions by any interested parties in the new hearing, with an opportunity to file new evidence in support of or in opposition to the expiration of prepaid wireless account balances; and
 - iii. render a decision on the new hearing within 180 days of the Order.
 2. The Company's response, in short, is that the DCF Application is without merit and should be dismissed in its entirety. This is the fourth proceeding DCF has advanced this same position. In fact, in a rare move, the CRTC denied DCF application for costs given the lack of evidence and perspective they contributed to the hearing (Telecom Order CRTC 2014-220).

3. SaskTel is aware and supports the comments of the Canadian Wireless Telecommunications Association (CWTA). The CWTA opposes DCF petition to the Governor in Council and in SaskTel's view satisfactorily addresses the claims put forward by DCF in the petition.

4. SaskTel, like the CWTA, believes that the CRTC has adequately dealt with the issue of prepaid cards in Telecom Regulatory policy 2013-271 and there are no errors in fact or in law which would need to be addressed by the Governor in Council.

5. SaskTel policies on prepaid cards are consistent with the CRTC Code of Conduct. It is our position that DCF has raised no evidence that these positions should be changed at this time. SaskTel believes that the application should be dismissed.

Sincerely,



Robert Hersche
Senior Director of Regulatory Affairs

RH/gcv

cc: Pamela Miller, Director General, Telecommunications Policy Branch, Industry
Canada, telecom@ic.gc.ca

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