



**CCVO**  
CALGARY  
CHAMBER of  
VOLUNTARY  
ORGANIZATIONS

Kahanoff Centre  
#940, 1202 Centre St SE  
Calgary, AB T2G 5A5

Tel. 403.261.6655  
Fax 403.261.6602

[www.calgarycvo.org](http://www.calgarycvo.org)

July 29, 2008

Privy Council and Secretary to the Cabinet  
Langevin Block, 80 Wellington Street,  
Ottawa, ON K1A 0A3

The Honourable Jim Prentice P.C., M.P.,  
Minister of Industry,  
C.D. Howe Building, 235 Queen Street,  
Ottawa, ON K1A 0H5

The Honourable Gordon O'Connor P.C., M.P.,  
Minister of National Revenue,  
7th Floor, 555 MacKenzie Avenue,  
Ottawa ON K1A 0L5

**Re: Canada Gazette, Part I, June 14, 2008, Telecommunications Act, Notice No. DGTP-002-2008 — Petition to the Governor in Council concerning Telecom Decision CRTC 2008-6, Vol. 142, No. 24.**

I am writing on behalf of The Calgary Chamber of Voluntary Organizations regarding the Petition to the Governor in Council concerning Telecom Decision CRTC 2008-6, Vol. 142, No. 24 and the impact of this decision on Canada's charities.

The Calgary Chamber of Voluntary Organizations (CCVO) is a registered charity working to strengthen the non-profit/voluntary sector and provide leadership on cross-cutting policy issues affecting the sector as a whole.

We have a diverse membership of over 400 organizations, from large organizations such as the United Way, the Glenbow Museum and Volunteer Calgary, to small grassroots organizations such as Bow Cliff Seniors, the members of the Ethno-Cultural Council of Calgary and the Alberta Seventh Step Society. Our members work in areas across the community, including housing, social services, health, sports and recreation, arts, and environment, among others.

CCVO believes that this ruling by the CRTC is in stark contrast to important long-standing public policy principles that have underscored the relationship between the Government of Canada and charities. We urge you to rescind the CRTC's ruling as it applies to charities.

The CRTC ruling undermines the spirit of Parliament's decision to exempt registered charities from the Do Not Call List (DNCL), which is the principle component of the telemarketing rules that the new CRTC investigative body was set up to enforce. While they are exempt from the rules, charities will have to both finance and comply (in part) with two regulatory regimes. First, they are required to establish and pay for their own internal Do Not Call List, and second, register with and pay for the national DNCL registry, from which they have been exempt.

This added expense will place an undue burden on charities. Under the *Income Tax Act*, charities are exempt from taxation and they must apply their funding and resources to charitable objectives. Registering with and financing a new enforcement body at the CRTC is not a charitable objective. Unlike commercial enterprises, charities are not able to pass such fees on to customers.

We understand that it is an exceptional request to ask Cabinet to intervene in a decision of a regulatory body. However, there is a long history of federal, provincial and municipal “forbearance” and exemption of charities from fees and regulations that are burdensome and undermine our charitable missions. In terms of telemarketing, charities were provided with a statutory exemption to the national DNCL to avoid new constraints on their ability to raise charitable donations to fund their work in the community.

Furthermore, the ruling by the CRTC will increase the administrative burden on charities, and will divert valuable time and resources away from their charitable activities.

In other departments and programs, the Federal Government has recognized the nature of charitable organizations and undertaken a number of initiatives aimed at reducing red tape for organizations, including the introduction of a new *Not-for-Profit Corporations Act* and the Treasury Board’s new *Action Plan to Reform the Administration of Grant and Contribution Programs*. Intervening in the CRTC decision would make the DNCL’s treatment of charities consistent with other Government departments and programs.

For these reasons, we urge you to rescind the CRTC ruling as it applies to charities.

Thank you for your consideration of our concerns and your support of Canada’s charities.

Sincerely,



Katherine van Kooy, President and CEO  
The Calgary Chamber of Voluntary Organizations

cc. The Honourable Diane Ablonczy P.C., M.P., Secretary of State (Small Business and Tourism)  
cc. Director General, Telecommunications Policy Branch  
cc. Lee Richardson, Member of Parliament, Calgary Centre  
cc. Andrea McManus, Board Chair, The Calgary Chamber of Voluntary Organizations