

Lead **SBNS-SESU** Input: **2008-07-24**
Action: **DRAFT** File#: **DA 45000-1-1**
Issue: **TELECOM-POLICY-GEN**
Doc/File Date: **2008-07-17** Analyst: **M.C**
Document #: **0 145084** **BF:2008-08-15**

353 Dalhousie Street, 3rd Floor, Ottawa, Ontario K1N 7G1
Tel : 613.231.4371 1.800.670.0401 Fax : 613.231.6725
Email : info@volunteer.ca Website : www.volunteer.ca

VOLUNTEER
BÉNÉVOLES
C A N A D A

353 rue Dalhousie, 3e étage, Ottawa, Ontario K1N 7G1
TÉL : 613.231.4371 1.800.670.0401 Téléc. : 613.231.6725
Courriel : info@benevoles.ca site Web : www.benevoles.ca

July 17, 2008

Mr. Kevin Lynch
Clerk of the Privy Council and Secretary to the Cabinet
Langevin Block
80 Wellington Street,
Ottawa, ON K1A 0A3

2008 JUL 21 A 10:00

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.

Dear Mr. Lynch:

Please accept this submission to you on behalf of Volunteer Canada regarding the impact of the above-noted CRTC decision on Canada's charities in relation to the national Do-Not-Call-List (DNCL).

Volunteer Canada is a registered charity that, since 1977, has been leading the advancement of volunteerism to strengthen society and improve quality of life in Canada.

Volunteer Canada strongly believes that this decision by the CRTC erodes important long-standing principles concerning the ultimate authority that resides with our elected officials in setting public-policy in Canada. It is these principles that have underscored the relationship between governments and charities since Confederation. As a result of this, we urge you to rescind the CRTC's ruling insofar as it applies to charities.

Canada's 84,000 charities deliver essential services to Canadians. More than half of those organizations have few staff, or are managed solely through the efforts of volunteers. Many are already challenged by the requirement for compliance with the T3010 regime at Canada Revenue Agency. Placing additional obligations under the Telecommunications Action places an additional burden of red tape onto already under-resourced organizations. This decision is also contrary to Bill C-62, a *Not-for-Profit-Corporations Act*, introduced into Parliament in June 2008, with the aim of reducing the administrative burdens of Canada's charities and not-for-profit agencies. This ruling by

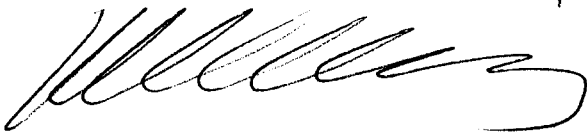
the CRTC undermines both this legislative initiative as well as Parliament's decision to exempt registered charities from the national DNCL.

Also of serious concern to Volunteer Canada is the issue of additional fees that will be incurred by charities as a result of the new enforcement requirements with the CRTC. Charities in Canada have historically been exempt from taxation under the *Income Tax Act*. This type of expenditure does not allow for compliance with Canadian charities' requirement to apply their funding and resources solely to charitable objectives.

Charities were successful in securing an express statutory exemption to the national DNCL, to avoid placing new constraints on the ability of charities to raise charitable donations and fund our work in our communities. Each year, 22.2 million Canadians choose to donate to Canadian charities, and claim \$9 billion per year in receipted donations.

It is for these reasons, that Volunteer Canada urges Cabinet to intervene in the decision of the CRTC and rescind the ruling insofar as it applies to charities. Thank you for your consideration and for your support of Canada's charities.

Yours truly,



Ruth MacKenzie
President

cc: The Honourable Diane Ablonczy P.C., M.P., Secretary of State (Small Business and Tourism)

cc: Director General, Telecommunications Policy Branch, Industry Canada
(via email telecom@ic.gc.ca)