

# UNIVERSITY of GUELPH

COLLEGE OF SOCIAL AND APPLIED HUMAN SCIENCES  
Department of Consumer Studies

April 2, 2002

Johanne D'Auray  
Deputy Commissioner  
Competition Bureau  
Industry Canada  
Place du Portage 1  
50 Victoria Street  
Hull, Quebec  
K1A 0C9

Dear Ms. D'Auray:

I have reviewed the copy of the Guidelines for Unreasonably Low Pricing. I find the guidelines generally very pertinent and appropriate as outlined. They are concisely written and comprehensively cover key issues. I have only a few comments which should perhaps be considered. These are:

- a) Preface; paragraph 2, line 9 - "...the developments in economic thinking ....". Like what? - could be expanded for clarity.
- b) Preface; paragraph 2, line 10 - I would suggest the sentence be "...to reflect a more modern perspective..." Add the word "more".
- c) Page 8. 1. (b) - does services include financial and internet? Could be expanded for clarity as to what "services" are covered.
- d) The factors covered in Section "a" are good points to be considered over a period of time of performance of a company - and not any immediate circumstance decision.
- e) Page 16; 5. i), paragraph 3, lines 2-3 - "...the time period over which the costs of the firm are avoidable." Like what costs? Needs to be expanded briefly for clarity.

I hope these comments are helpful. If you should wish to discuss further, you can contact me by phone at (519) 824-4120 extension 6715.

Sincerely yours,



Dr. Trevor Watts  
Professor Emeritus