



March 27, 2006

VIA E-MAIL

Ms. Diane Rhéaume
Secretary General
Canadian Radio-television
and Telecommunications Commission
1 Promenade du Portage
Gatineau, QC
K1A 0N2

Dear Ms. Rhéaume:

Proceeding to establish a national do not call list framework and to review the telemarketing rules, Telecom Public Notice CRTC 2006-4, 20 February 2006 – The DNCL Operations CISC Subcommittee

1. Infolink Technologies Ltd. ("Infolink") notes that the Commission has determined that certain issues it has identified in relation to operation of the National do not call list ("DNCL"), as referred to in section 1(b) of PN 2006-4, are best resolved in the DNCL Operations CISC Subcommittee,¹ namely, matters pertaining to:
 - (a) consumer registration;
 - (b) measures to ensure the protection of privacy and personal information;
 - (c) rates charged by the DNCL operator; and

¹ See PN 2006-4, paras. 35, 36 and Letter dated March 17, 2006 from CRTC staff (Leonard Katz, Executive Director – Broadcasting and Telecommunications) to Saskatchewan Telecommunications (Bryce C. Schurr) on behalf of Aliant Telecom Inc., Bell Canada, NorthernTel Limited Partnership, MTS Allstream Inc., Northwestel Inc., Télébec, société en commandite and TELUS Communications re Mandate of the DNCL CISC Subcommittee.

(d) administrative procedures and requirements for the registration and investigation of complaints.

2. Infolink is an interested participant in the DNCL Operations CISC Subcommittee. However, pursuant to paragraph 39 of PN 2006-4, as amended, Infolink wishes to place the following two comments on the record of the CISC in advance of the commencement of the CISC's work.

3. First, the only information that DNCL users should be able to access is the telephone numbers that individuals and businesses have registered on the DNCL. In practical terms, this operational rule will require that persons undertaking telemarketing initiatives need only check the telephone numbers on the proposed call list against the telephone numbers registered on the DNCL as of the relevant date. This will have at least three salutary effects:

(a) it will automatically limit the amount of personal information that the DNCL Operator is required to divulge to persons accessing the DNCL for purposes of conducting a telemarketing initiative;

(b) because telephone numbers are unique (while names of individuals or businesses may not be), this will increase certainty in the system; and

(c) it will guard against the situation where a person having multiple telephone numbers fails, through inadvertence or oversight, to register all of the telephone numbers that that person wishes to place on the DNCL. Telemarketing firms and their customers have no way of verifying all of the different telephone numbers subscribed to a particular person and should, therefore, not be held responsible for placing a restricted call to a number that is not registered on the DNCL.

4. Second, Infolink is of the view that when a person contacts the DNCL Operator to register a telephone number, the DNCL Operator should be required to verify whether the registration amends a pre-existing registration. In order to do so, the DNCL Operator will likely have to ascertain if the person has previously been registered under a different

telephone number or number(s). The more up-to-date the DNCL, the more effective and efficient its operation will be.



Cesar Correia
Manager, Operations

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