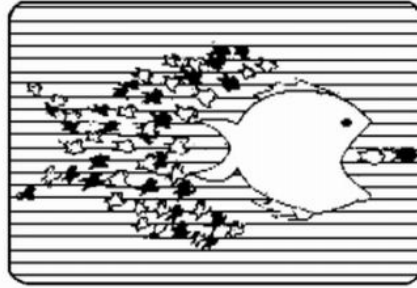


**The  
British Columbia  
Public Interest  
Advocacy Centre**

208-1090 West Pender Street  
Vancouver, BC V6E 2N7  
Tel: (604) 687-3063 Fax: (604) 682-7896  
email: [bcpiac@bcpiac.com](mailto:bcpiac@bcpiac.com)  
<http://www.bcpiac.com>



Richard J. Gathercole 687-3006  
Sarah Khan 687-4134  
Patricia MacDonald 687-3017  
James L. Quail 687-3034  
Leigha Worth 687-3044  
Ros Salvador 488-1315  
  
Barristers & Solicitors  
  
Valerie Conrad  
Articled Student

**Via email**

June 6, 2006

Ms. Diane Rheume  
Secretary General  
CANADIAN RADIO- TELEVISION AND  
TELECOMMUNICATIONS COMMISSION  
Ottawa, Ontario K1A 0N2

Dear Ms. Rheume:

**Re: Public Notice CRTC 2006-4: Proceeding to establish a do not call list framework and to review the telemarketing rules – Submissions of BCOAPO *et al.***

On behalf of the British Columbia Old Age Pensioners' Organization, Active Support Against Poverty, BC Coalition of People with Disabilities, Council of Senior Citizens' Organizations of BC, End Legislated Poverty, federated anti-poverty groups of BC, and Tenants' Rights Action Coalition, collectively referenced as "BCOAPO *et al.*", we write to provide brief reply submissions regarding the national Do Not Call List Framework and the Telemarketing Rules.

BCOAPO *et al.* wishes to adopt the submissions made on March 27, 2006 in these proceedings by the national Consumers Association of Canada and the CAC (Manitoba Branch)/Manitoba Society of Seniors, as well as the reply submissions filed by the national CAC on May 23, 2006. In particular, we wish to highlight the following:

- To prevent abuse of the national DNCL, the Commission should establish guidelines and provide strict interpretations of the exemptions created in sections 41.7(1) and (2) of the amended *Telecommunications Act*.
- The national DNCL should only consist of a list of phone numbers. The administering body may retain other information separately in order to verify registration, but this information should not be circulated. Providing additional identifying information on the DNCL would encourage use or circulation of the list for prohibited purposes.
- All sellers, telemarketers or organizations covered by the DNCL rules should be required to subscribe to the national DNCL before placing any unsolicited calls.

- Section 41.7(3) of the amended *Telecommunications Act* requires parties making the calls to clearly identify themselves, the identity of the calling party or the organization on whose behalf the call is being made, and the purpose of the call. The Commission should clarify that s.41.7(3) applies regardless of the type of telecommunication service used to contact a consumer. Additionally, if requested, the telephone number or address at which the calling party or organization may be contacted should be provided. Any telephone number provided should be accessible and free of charge to the called party.
- If the calling party has Caller ID, the Commission should require telemarketers to transmit their number and their name, or the name of the organization on whose behalf the call is being made.

Thank you very much for your consideration.

Yours truly,

**BC PUBLIC INTEREST ADVOCACY CENTRE**

*original signed by*

Sarah Y. Khan  
Counsel for BCOAPO *et al.*

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