



TELUS Corporate Citizenship &
Communication
510 W Georgia St
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10 June 2024

Standing Senate Committee on Social Affairs, Science and Technology

the Senate of Canada
Ottawa, Ontario
Canada
K1A 0A4

RE: TELUS' comments on C-58

Dear Senators,

TELUS unequivocally opposes Bill C-58.

TELUS calls on the Senate to preserve the current bargaining framework to ensure both service continuity and protect Canada's resilient telecommunications industry.

The current draft of Bill C-58 attempts to solve a problem that does not exist, demonstrates a fundamental misunderstanding of the role of continuity workers, and significantly increases the risks associated with network outages. Perhaps most importantly, the amendments made in the House of Commons should concern Senators. Removing the ability to assign employees between workplaces during a labour dispute eliminates a crucial source of service continuity for Canadians.

The current bargaining agreement that exists between TELUS and its unionized workforce has resulted in nation-leading pay, benefits, and working conditions. TELUS' unionized employees are up to 40%¹ better compensated compared to their counterparts in equivalent roles at other companies. This is a common trend for unionized employees in railway, air transportation, broadcasting, and port services²: the compensation, benefits, and job security of unionized employees in the federal sector is virtually unparalleled.

While the work performed by TELUS' unionized team members is crucial for day to day services, continuity workers serve a very precise and narrow function: to maintain critical

¹ <https://www150.statcan.gc.ca/t1/tbl1/en/tv.action?pid=1410034001>, NOC codes 65 and 72.

² Statistics Canada, Collective Bargaining Coverage Rate, 1997 to 2021: <https://www150.statcan.gc.ca/n1/pub/14-28-0001/2020001/article/00015-eng.htm>; Statistics Canada, Average weekly earnings, average hourly wage rate and average usual weekly hours by union status, annual, Table 14-10-0134-01: <https://www150.statcan.gc.ca/t1/tbl1/en/tv.action?pid=1410013401>

operations. TELUS' unionized workforce is responsible for ensuring our networks are active 24/7; repairing damage to infrastructure, restoring access to wireless sites, managing central offices, responding to customer calls, and a host of other crucial daily activities. With or without continuity workers, TELUS cannot replicate the work performed by these 4,000+ TELUS team members

As climate disasters become more frequent and more destructive, connectivity has become even more important to those who may be impacted by these disruptions, and those who are called in as first responders. This is dramatically compounded in the 187 rural, remote, and Indigenous communities where TELUS is the sole provider, as the Bill prevents us from redeploying management resources.

The House of Commons amended C-58 to prevent employers redeploying management employees between regions, including those completely unserved during a work stoppage. These amendments will lead to prolonged and more impactful outages, as this situation would present employers with unattainable standards to meet and undermine the government's important goal of enhancing network resilience. Without continuity workers, there will be more service interruptions and the outages will be longer.

The vast majority of Canadians (95%) support the protection of these services during a strike or lockout, and nearly three in four (74%) express that delays in restoring telecom services during climate events are unacceptable.³

Some have pointed to the proposed Maintenance of Activities clauses in C-58 as a panacea for industry's concerns. These provisions fall well short of safeguarding even the most basic level of services and functions Canadians rely on, as the continued provision of those services does not meet the unreasonably stringent threshold set by the Canada Industrial Relations Board.

TELUS believes the Senate should not proceed with C-58. In the alternative, the Committee should remove the workplace-related amendments from the House of Commons to ensure industry can maintain a basic level of operations and ensure communications networks stay up and running for Canadians. Without the ability to move employees between locations to maintain a basic level of service, the critical services telecommunications companies provide are at risk. The Senate can help protect these critical services with the following amendment:

Proposed amendment to section 9(4): "Delete clause (c)."

³ <https://nanos.co/wp-content/uploads/2024/04/2024-2577-Canada-Telecoms-Populated-Report-with-tabs.pdf>, p.3



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The Committee should also adopt, in their entirety, the amendments proposed by FETCO.

TELUS has, for the convenience of the Committee, included as an annex to this letter its comments to the House of Commons Standing Committee on Human Resources, Skills and Social Development and the Status of Persons with Disabilities on the matter of C-58.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jill Schnarr'.

Jill Schnarr
Chief Social Innovation and
Communications Officer

A handwritten signature in black ink, appearing to read 'Rhys M. Sandner'.

Rhys Sandner
Public Policy