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March 9, 2018

Mesmin Pierre
Director General
Trademarks Branch
Canadian Intellectual Property Office
50 Victoria Street, Room C236-10
Gatineau, Quebec K1A 0C9

Sent via email Email:
ic.cipo-consultations-opic.ic@canada.ca

Dear Mr. Pierre:

After reviewing the proposed Trademarks Regulations published in the Canada Gazette, Part I, on February 10, 2018, we feel the need to express our concerns.

As background, I am the Trademark Agent and IP Assets Manager for Rogers Communications Inc., Rogers Communications Canada Inc. and Rogers Media Inc., a position that I've held for over a decade. Consequently, I am responsible for protecting the trademarks of one of Canada's top 10 most valuable brands (see Brand Finance 2017 ranking of Canada's most valuable brands):

http://brandfinance.com/images/upload/canada_100_2017_locked.pdf) I have also been honoured to act as an instructor at McGill University's summer training program, focusing on trademarks.

I'm personally concerned by the wording used in the drafting of some portions of the Regulations: some are not very clear. In particular, sections 32(2) 32(3), 40(1), 77, 115, 132 (2), 154(2), 155, 159 and 160 are not expressed clearly. We are unable to determine if this could have negative consequences in respect of my company's ability to properly protect its trademark assets.

Additionally, if we are unable to understand this wording, I wonder if others who do not have the benefit of having a qualified practitioner on staff will clearly understand the requirements, which I had understood was a goal for this government.

For these reasons, I request that you clarify the wording in these Regulations, and in particular, those sections noted above.

Regards,



Catherine Douglas
Trademark Agent &
Manager IP Assets
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& Rogers Media