

Montréal, March 9th, 2018

Mr. Mesmin Pierre
Director General
Trademarks Branch
Canadian Intellectual Property Office
50 Victoria Street, Room C236-10
Gatineau, Quebec
K1A 0C9
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, 2019, I feel the need to contact CIPO to express my concern.

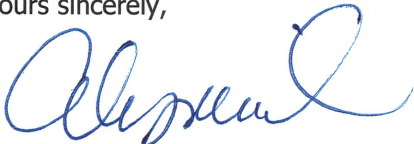
To provide some insight into my experience, I am the Vice President, Legal Affairs and CPO of Cogeco Connexion Inc., a position that I've held for 15 years. Consequently, I am ultimately responsible for protecting the trademarks of one of Canada's most valuable brands (see Brand Finance 2017 ranking of Canada's most valuable brands): http://brandfinance.com/images/upload/canada_100_2017_locked.pdf

I am concerned by the approach used in the drafting of some portions of the Regulations, as certain provisions are very difficult to understand. In particular, sections 32(2) 32(3), 40(1), 77, 115, 132 (2), 154(2), 155, 159 and 160 are not expressed clearly, and could have negative consequences in respect of our organization's ability to properly protect its trademarks.

Moreover, if someone of my experience and training in trademark protection finds the Regulations difficult to clearly understand, they are likely to be an outright barrier to Canadian companies who don't have the benefit of having an experienced trademark professional on staff. This runs counter to the goals of modernizing, updating and *clarifying* the regulatory framework for Canada's trademark regime.

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

Yours sincerely,



Caroline Dignard,
Vice President, Legal Affairs and
Chief Privacy Officer, Cogeco Connexion