

APPENDIX "G"

Submission of the Canadian Industrial Traffic League on Bill C-120

Mr. Chairman and Members of the Standing Committee on Railways, Canals and Telegraph Lines.

The Canadian Industrial Traffic League (Inc.) is a national organization expressly serving the transportation interests of its members. We have approximately 1200 members across Canada.

The efficient and economical transportation of goods and of persons on behalf of their firms is the main responsibility of traffic management personnel. This Submission contains the views and opinions of those who directly pay the freight charges to the Canadian Railways on behalf of their companies.

This submission by the League is being made on the understanding that nothing contained herein shall be deemed to abridge the rights of the League's individual member companies to make other or separate submissions elaborating hereon or differing herefrom the views expressed in this submission.

Since 1916 it has been the endeavour of the League at all times to co-operate with the Transportation Companies, Federal and Provincial Regulatory Bodies, Royal Commissioners, and other organizations interested in the promotion, conservation and protection of a sound national transportation industry.

Our submission with respect to the contents of Bill C-120 will follow the same order as shown in the said Bill.

Clause 3, (Sec. 45-A)

Some apprehension has been expressed by our members that the wording of this section is broad enough to permit the appearance of *any* association or body before the Board, however, we interpret the section to permit the representative or agent of any provincial government or any association or other body *representing the interests of shippers or consignees* (underlining ours) in Canada to appear. If our interpretation is correct we do not have any objection to this section, however, if otherwise, then we submit that the representative or agent of any association or body representing the interests of carriers or other modes should not be permitted to appear before the Board on matters affecting the railways.

Clause 5, (Sec. 156(1))

We are in general agreement with the proposed amendment, however, there is some question as to the interpretation of "transportation company" and "common carrier" and we are of the opinion that these terms should be defined in Section 2 of the Railway Act.

Clauses 9, 10, 11, 12 (Secs. 317, 319, 320, 322, 323)

These clauses repeal the sections of the Act which prohibit undue preference and unjust discrimination and we are generally in accord with the removal of any restraints which hamper the railways in meeting competition, however we think the proposed amendments go much farther than enabling the railways to meet competition. It would permit a situation which could be seriously detrimental to shippers, if the railways were left free to publish any rate or condi-