

designated as "Section 91A", entitled "Interest on Overpayments or Refunds", shown and attached hereto as (Exhibit C).

Your petitioners respectfully submit that the proposed "Amendment", if adopted, will have no bearing on the merits or demerits of any claim, past, present or future, and cannot bring into existence a single new claim for any principal sum involving a refund. This petition and "Amendment" is confined exclusively to the payment of interest in addition to the principal sums involved in claims already established or to be established. Neither would this "Amendment" involve any administrative difficulties or expense worth speaking of, for while it may, and frequently does, take several months or even years, of negotiations to finally establish, to the satisfaction of the Government, the principal sums involved in refund claims as between the Crown and taxpayers or citizens, the computation of simple interest on any such claims, once established, would only be a matter of minutes.

Furthermore, there could be no possible abuse of the privileges conferred under this "Amendment" because no taxpayer could recover under its safeguarding provisions more than he is entitled to receive, and in many cases he could only recover a major or substantial portion of his actual interest carrying charges or losses.

This fact, together with the justification and the reasonableness of 6% simple interest AS COMPENSATION FOR THE LOSS OF THE USE OF THE MONEY as provided for in the "Amendment" is amply borne out in a few comparative examples contrasting the ultimate cost to the Crown and taxpayers alike of simple and compound interest payments, as illustrated in (Exhibit C) and in the differentials, tables and statements pertaining to and reflecting the actual ultimate cost of Canada's Funded Debt and Guaranteed Securities during the War and post-war periods, shown in (Exhibit D), hereto attached.

The proposed "Amendment" with its retroactive and equitable safeguarding provisions for the general application of the principle involving the payment of interest on deferred refunds and credits, past, present or future, constitutes an