

April 24, 2019

Federal Mediation and Conciliation Service
165 de l'Hotel-de-Ville Street
Place de Portage, Phase II, 7th Floor
Gatineau, QC K1A 012

Dear Sir or Madam:

**Re: Bell MTS (Bell Canada) – Employer Applicant and
The Telecommunications Employees Association of Manitoba –
International Federation of Professional & Technical Engineers
(TEAM-IFPTE), Local 161 - Union**

Cochrane Saxberg Law Office is legal counsel to TEAM-IFPTE. I am a partner in Cochrane Saxberg and I have been retained as the lead negotiator for TEAM-IFPTE with respect to gaining a revised collective agreement with Bell Canada. I have received a copy of Mr. Rooney's letter dated April 22, 2019, wherein he has made a request for the appointment of a Conciliation Officer.

In considering Mr. Rooney's request on behalf of Bell Canada, please consider the following:

1. This is TEAM-IFPTE's first ever negotiation with Bell Canada, who acquired MTS Inc. in March 2017.
2. Bell Canada, since acquiring MTS Inc., has reduced its workforce and TEAM-IFPTE's membership from 925 as of March 17, 2017, to 718 as of April 19, 2019. Bell Canada has indicated that further reductions to the workforce are planned.
3. After receiving the Notice to Bargain, TEAM-IFPTE made its request for disclosure of information from Bell Canada on November 6, 2018. The disclosure request has not been adequately replied to, there are numerous disclosure requests outstanding and disclosure from Bell continues to be only partially provided on important issues (even as late as some being provided on April 15, 2019).
4. Bell has unilaterally walked out on two bargaining sessions half-way through each day with TEAM-IFPTE (February 20, 2019 and April 10, 2019) despite the



fact that full days had been booked for bargaining and despite the fact that numerous issues remained on the table and/or had not even had the opportunity to be discussed yet.

5. Bell unilaterally cancelled the entirety of two bargaining sessions, those being on February 21, 2019 and April 16, 2019.
6. Both parties had agreed to discuss a critical issue for TEAM-IFPTE, that being Bell Canada's practice of 'contracting in' to the workforce (even while substantially reducing the size of TEAM's membership through their reduction of employment positions). Both sides agreed to study the issue and, if necessary, to bring in subject experts on the issue. TEAM-IFPTE prepared to bring in its Labour Relations Officer, Erin Spencer, for the purpose of negotiating this specific issue. It was specifically agreed that 'contracting-in' would be negotiated on April 16, 2019, and again Bell Canada unilaterally cancelled that bargaining session and, instead, made the request for the appointment of a Conciliation Officer claiming "the parties are clearly at impasse".
7. When the parties met on April 10, 2019, they broke for lunch with Mr. Rooney indicating verbally that the parties would reconvene at 1:30 pm as there was "a lot to talk about". When the parties re-convened at 1:30 pm, Mr. Rooney had written out a statement, which he read, indicating that Bell Canada was cancelling the negotiation for the day, cancelling the further negotiation scheduled for April 16, 2019 (contracting-in) and refusing to set new dates to bargain with TEAM-IFPTE.
8. TEAM-IFPTE has tabled a substantial proposal on the issue of job reductions. Due to the significant loss of jobs in Manitoba since Bell Canada acquired MTS Inc., this is obviously a critical issue to bargain for TEAM-IFPTE. Bell Canada has not yet met with TEAM-IFPTE to discuss the proposal and, instead, has cancelled all future bargaining dates and refused to set new dates.
9. The parties have not yet met to discuss monetary issues. TEAM-IFPTE remains prepared to do so and has indicated to Bell Canada that the parties should park any non-monetary issues that they cannot resolve and move on to the bargaining of monetary issues.

It is TEAM-IFPTE's position that Bell Canada has not met its duty to bargain in good faith to this point. TEAM-IFPTE remains committed to working cooperatively with Bell Canada to resolve these important issues and to commit to a revised collective agreement that works for both parties. To that end, TEAM-IFPTE asserts that it is



premature for Bell Canada to request the assistance of a Conciliation Officer when they have failed and refused to even meet with TEAM-IFPTE to bargain on many critical outstanding issues.

Yours truly,

COCHRANE SAXBERG

Per:



SHAWN SCARCELLO

SS / ec

cc: Bob Linsdell, Executive Director TEAM-IFPTE
Don Rooney, Director of Labour Relations, Bell Canada

