



January 31, 2013

IASB  
30 Cannon Street,  
London, United Kingdom  
EC4M 6XH

Re: Effective Date – Revenue from Customers with Contracts

Dear Sirs and Mesdames:

BCE Inc., Rogers Communications Inc., and TELUS Corporation are Canada's three largest telecommunications companies with a combined market capitalization of CAD\$80.2 billion. The purpose of this letter is to provide the IASB with our views with respect to the effective date of the proposed revenue recognition standard.

If the Board chooses full retrospective application, we believe the effective date should be at least three years after the final IFRS is issued. As the IASB knows, this standard will require significant changes to billing systems, of which there are many in each of our companies, and the changes are pervasive. At least a full year will be needed to plan and implement those changes. Then the new systems will need to be run in parallel with the existing systems so that two years of comparative information is available in the year the standard becomes effective. We do not believe there are any "shortcuts" that can be developed to provide materially correct comparative amounts.

If the Board chooses prospective application, less preparation time would be required but the minimum one year for systems changes still is necessary. We also note that prospective application will result in very different revenue amounts and the variances between years will be difficult to explain, if they can be explained at all.

We hope the above comments are of use to the IASB as they finish their deliberations on this standard. Please do not hesitate to contact any one of us if you have questions.

Yours truly,

Karyn A. Brooks, FCA  
BCE Inc.  
Senior Vice-President and  
Controller

Douglas D. French, CA  
TELUS Corporation  
Vice- President & Controller,  
Corporate Accounting  
& Financial Reporting

Paulina Molnar, CA  
Rogers Communications Inc.  
Vice-President, Corporate  
Controller