



M. Mackenzie #5  
Sworn: September 16th, 2008

No. S085226  
Vancouver Registry

**IN THE SUPREME COURT OF BRITISH COLUMBIA**

BETWEEN:

BRITISH COLUMBIA TEACHERS' FEDERATION,  
FEDERATION OF POST-SECONDARY EDUCATORS OF BRITISH COLUMBIA,  
BRITISH COLUMBIA DIVISION OF THE CANADIAN UNION OF PUBLIC EMPLOYEES,  
BRITISH COLUMBIA NURSES' UNION  
and MARCIA TOMS

PLAINTIFFS

AND:

ATTORNEY GENERAL OF BRITISH COLUMBIA

DEFENDANT

**AFFIDAVIT**

I, MOIRA MACKENZIE, of 100-550 West 6<sup>th</sup> Avenue, in the City of Vancouver, in the Province of British Columbia, AFFIRM AND SAY AS FOLLOWS:

1. I have been the Director of the Communications and Campaigns Division of the British Columbia Teachers' Federation (the 'BCTF') since July 1, 2002, and as such have personal knowledge of the facts and matters to which I have hereinafter deposed.
2. Attached hereto and marked as **Exhibit "A"** to this my Affidavit is a true copy of Canada Post's table of 'Unaddressed Admail Prices', extracted from the website of Canada Post at [http://www.canadapost.ca/offerings/unaddressed\\_admail/pdf/UA\\_09-e.pdf](http://www.canadapost.ca/offerings/unaddressed_admail/pdf/UA_09-e.pdf).
3. The table sets out that it would cost 12.8 cents per flyer to mail out flyers that weighed up to 50 grams, under a non-contract basic mail pricing.

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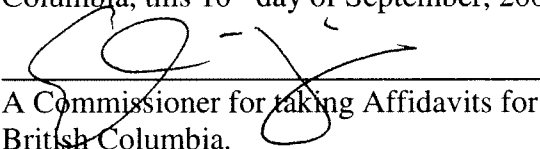
1. I have been the Director of the Communications and Campaigns Division of the British Columbia Teachers' Federation (the 'BCTF') since July 1, 2002, and as such have personal knowledge of the facts and matters to which I have hereinafter deposed.
2. Attached hereto and marked as **Exhibit "A"** to this my Affidavit is a true copy of Canada Post's table of 'Unaddressed Admail Prices', extracted from the website of Canada Post at [http://www.canadapost.ca/offerings/unaddressed\\_admail/pdf/UA\\_09-e.pdf](http://www.canadapost.ca/offerings/unaddressed_admail/pdf/UA_09-e.pdf).
3. The table sets out that it would cost 12.8 cents per flyer to mail out flyers that weighed up to 50 grams, under a non-contract basic mail pricing.

4. In my experience as Director of the Communications and Campaigns Division of the BCTF, the cost of producing flyers for a riding specific mail-out campaign has been approximately 4 cents per flyer.

5. When combining the Canada Post cost of 12.8 cents per flyer with the production cost of approximately 4 cents per flyer, for a total of 16.8 cents per flyer, it would cost an organization \$3,024 to do a mail-out of 18,000 flyers in one electoral district.

6. Attached hereto and marked as **Exhibit "B"** to this my Affidavit is a true copy of the Elections BC webpage "Electoral Maps/Profiles", extracted from their website at <http://www.elections.bc.ca/map/edpro01.htm>.

7. In the Elections BC website, statistics for the 79 provincial electoral districts are given. Of all the 79 electoral districts, 51 electoral districts have more than 18,000 households.

AFFIRMED BEFORE ME at the City of )  
Vancouver, in the Province of British )  
Columbia, this 16<sup>th</sup> day of September, 2008. )  
 )  
A Commissioner for taking Affidavits for )  
British Columbia. )

  
MOIRA MACKENZIE

**Elin R. S. Sigurdson**  
Arvay Finlay  
Barristers  
1350 - 355 Burrard Street  
Vancouver, BC V6C 2G8  
Phone 604.689.4421  
Fax 604.687.1941

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BETWEEN:

BRITISH COLUMBIA TEACHERS' FEDERATION, FEDERATION OF  
POST-SECONDARY EDUCATORS OF BRITISH COLUMBIA, BRITISH  
COLUMBIA DIVISION OF THE CANADIAN UNION OF PUBLIC  
EMPLOYEES, BRITISH COLUMBIA NURSES' UNION and MARCIA  
TOMS

PLAINTIFFS

AND:

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DEFENDANT

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**AFFIDAVIT**

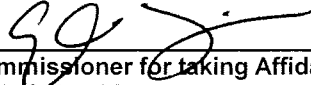
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Arvay Finlay  
Barristers  
1350 – 355 Burrard Street  
Vancouver BC V6C 2G8  
Phone: 604.689.4421  
Fax: 604.687.1941  
File No. 2638-001

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# Canada Post's table of "Unaddressed Admail Prices"

This is Exhibit A referred to in the  
Affidavit of Moira Mackenzie  
Sworn before me at the City of Vancouver, BC  
this 16<sup>th</sup> day of September, 2008.

  
\_\_\_\_\_  
A Commissioner for taking Affidavits for  
British Columbia

# Unaddressed Admail™ Prices



From anywhere... to anyone

This price sheet includes Non-Contract prices only. Qualifying customers may have access to lower prices by signing an Agreement. For further details contact the Commercial Service Network.

<b>Basic</b>	<b>Price per Item</b>		
<b>Non-Contract Price<sup>1</sup></b>	<b>Up to 50 g</b>	<b>Over 50 g up to 100 g</b>	<b>Over 100 g</b>
	11.6¢	11.6¢ + 0.15¢ per g over 50 g	17.2¢ + 0.15¢ per g over 100 g
<b>Transportation Fees<sup>2</sup></b>	<b>Up to 50 g</b>	<b>Over 50 g up to 100 g</b>	<b>Over 100 g</b>
	1.2¢	1.2¢ + 0.011¢ per g over 50 g	1.5¢ + 0.011¢ per g over 100 g
<b>Manual Order Processing Fee</b>	<b>Price per manual Order (Statement of Mailing)</b>		
	\$5.00		
<b>Reusable Plastic Pallet Usage Fee<sup>3</sup></b>	<b>Price per pallet</b>		
	\$2.00		

<b>Premium<sup>4</sup></b>	<b>Price per Item</b>		
<b>Non-Contract Price<sup>1</sup></b>	<b>Up to 50 g</b>	<b>Over 50 g up to 100 g</b>	<b>Over 100 g</b>
	12.8¢	12.8¢ + 0.15¢ per g over 50 g	18.4¢ + 0.15¢ per g over 100 g
<b>Transportation Fees<sup>2</sup></b>	<b>Up to 50 g</b>	<b>Over 50 g up to 100 g</b>	<b>Over 100 g</b>
	1.2¢	1.2¢ + 0.011¢ per g over 50 g	1.5¢ + 0.011¢ per g over 100 g
<b>Manual Order Processing Fee</b>	<b>Price per manual Order (Statement of Mailing)</b>		
	\$5.00		
<b>Reusable Plastic Pallet Usage Fee<sup>3</sup></b>	<b>Price per pallet</b>		
	\$2.00		

<sup>1</sup> These prices apply to all mailings submitted on a manual *Order (Statement of Mailing)*, and a manual *Order* processing fee may apply.

<sup>2</sup> Transportation Fees apply when Canada Post is required to transport items to the appropriate local delivery facility.

<sup>3</sup> A limited supply of reusable pallets is available for customers with brick-piled mailings (minimum order required). For more information, please call Canada Post at 1-866-757-5480.

<sup>4</sup> Applicable to mailings of Samples, Oversize items, and applicable to volume subject to Business Points of Call or with a specified Delivery Start Date.

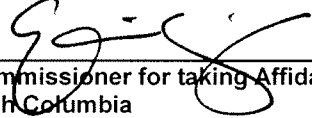
All prices are subject to any applicable rebates, discounts, fees, charges, surcharges and taxes. For further details visit our website at [www.canadapost.ca/uasupportdocuments](http://www.canadapost.ca/uasupportdocuments)

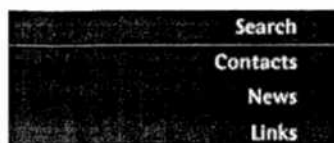
**How to reach us:**  
 Commercial Service Network  
 Electronic Shipping Tools Information/Registration

**1 866 757 5480**  
[www.canadapost.ca/obc](http://www.canadapost.ca/obc)

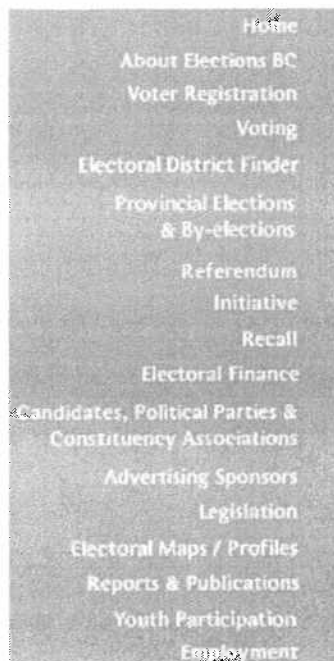
Elections BC webpage “Electoral Maps/Profiles”

This is Exhibit B referred to in the  
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Sworn before me at the City of Vancouver, BC  
this 16<sup>th</sup> day of September, 2008.

  
\_\_\_\_\_  
A Commissioner for taking Affidavits for  
British Columbia



**ELECTIONS BC**  
A non-partisan Office of the Legislature



## Electoral Maps / Profiles

### 2001 Electoral District Profiles (BC Stats)

The following files are in Adobe PDF format. Adobe Reader may be downloaded [here](#).

For Census information, visit Statistics Canada's [website](#).

- |   |   |
|---|---|
| 1. <a href="#">Abbotsford-Clayburn</a>        | 41. <a href="#">Peace River North</a>             |
| 2. <a href="#">Abbotsford-Mount Lehman</a>    | 42. <a href="#">Peace River South</a>             |
| 3. <a href="#">Alberni-Qualicum</a>           | 43. <a href="#">Penticton-Okanagan Valley</a>     |
| 4. <a href="#">Bulkley Valley-Stikine</a>     | 44. <a href="#">Port Coquitlam-Burke Mountain</a> |
| 5. <a href="#">Burnaby-Edmonds</a>            | 45. <a href="#">Port Moody-Westwood</a>           |
| 6. <a href="#">Burnaby-North</a>              | 46. <a href="#">Powell River-Sunshine Coast</a>   |
| 7. <a href="#">Burnaby-Willingdon</a>         | 47. <a href="#">Prince George-Mount Robson</a>    |
| 8. <a href="#">Burquitlam</a>                 | 48. <a href="#">Prince George North</a>           |
| 9. <a href="#">Cariboo North</a>              | 49. <a href="#">Prince George-Omineca</a>         |
| 10. <a href="#">Cariboo South</a>             | 50. <a href="#">Richmond Centre</a>               |
| 11. <a href="#">Chilliwack-Kent</a>           | 51. <a href="#">Richmond East</a>                 |
| 12. <a href="#">Chilliwack-Sumas</a>          | 52. <a href="#">Richmond-Steveston</a>            |
| 13. <a href="#">Columbia River-Revelstoke</a> | 53. <a href="#">Saanich North and the Islands</a> |
| 14. <a href="#">Comox Valley</a>              | 54. <a href="#">Saanich South</a>                 |
| 15. <a href="#">Coquitlam-Maillardville</a>   | 55. <a href="#">Shuswap</a>                       |
| 16. <a href="#">Cowichan-Ladysmith</a>        | 56. <a href="#">Skeena</a>                        |
| 17. <a href="#">Delta North</a>               | 57. <a href="#">Surrey-Cloverdale</a>             |
| 18. <a href="#">Delta South</a>               | 58. <a href="#">Surrey-Green Timbers</a>          |
| 19. <a href="#">East Kootenay</a>             | 59. <a href="#">Surrey-Newton</a>                 |
| 20. <a href="#">Esquimalt-Metchosin</a>       | 60. <a href="#">Surrey-Panorama Ridge</a>         |
| 21. <a href="#">Fort Langley-Aldergrove</a>   | 61. <a href="#">Surrey-Tynehead</a>               |
| 22. <a href="#">Kamloops</a>                  | 62. <a href="#">Surrey-Whalley</a>                |
| 23. <a href="#">Kamloops-North Thompson</a>   | 63. <a href="#">Surrey-White Rock</a>             |
| 24. <a href="#">Kelowna-Lake Country</a>      | 64. <a href="#">Vancouver-Burrard</a>             |
| 25. <a href="#">Kelowna-Mission</a>           | 65. <a href="#">Vancouver-Fairview</a>            |
| 26. <a href="#">Langley</a>                   | 66. <a href="#">Vancouver-Fraserview</a>          |
| 27. <a href="#">Malahat-Juan de Fuca</a>      | 67. <a href="#">Vancouver-Hastings</a>            |
| 28. <a href="#">Maple Ridge-Mission</a>       | 68. <a href="#">Vancouver-Kensington</a>          |
| 29. <a href="#">Maple Ridge-Pitt Meadows</a>  | 69. <a href="#">Vancouver-Kingsway</a>            |
| 30. <a href="#">Nanaimo</a>                   | 70. <a href="#">Vancouver-Langara</a>             |
| 31. <a href="#">Nanaimo-Parksville</a>        | 71. <a href="#">Vancouver-Mount Pleasant</a>      |
| 32. <a href="#">Nelson-Creston</a>            | 72. <a href="#">Vancouver-Point Grey</a>          |



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33. [New Westminster](#)

34. [North Coast](#)

35. [North Island](#)

36. [North Vancouver-Lonsdale](#)

37. [North Vancouver-Seymour](#)

38. [Oak Bay-Gordon Head](#)

39. [Okanagan-Vernon](#)

40. [Okanagan-Westside](#)

73. [Vancouver-Quilchena](#)

74. [Victoria-Beacon Hill](#)

75. [Victoria-Hillside](#)

76. [West Kootenay-Boundary](#)

77. [West Vancouver-Capilano](#)

78. [West Vancouver-Garibaldi](#)

79. [Yale-Lillooet](#)