



General Counsel  
**Stéphane Lacoste**

Avocat général

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Laval, March 4, 2010

BY TELECOPIER 416-973-6543

Mr. Peter Suchanek  
Regional Director and Registrar  
CANADA INDUSTRIAL RELATIONS BOARD  
1 Front Street West  
Suite 5300  
Toronto, Ontario  
M5J 2X7

Re : In the matter of the Canada Labour Code (*Part I – Industrial Relations*) and an application for declaratory opinion filed pursuant to section 15.1(2) concerning FedEx Ground Package System, Ltd., applicant; Canada Council of Teamsters, interested party (27982-C)  
Our file: 1126-007

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Dear Mr. Suchanek:

We appear on behalf of the Canada Council of Teamsters in the above captioned file.

Our clients were surprised to read FXG's application because it does not correspond to the facts known to them. In fact, it was only a few weeks ago that managers told members of the Teamsters that no decision had been made regarding pay raises but that if one was given it would not be before June 1<sup>st</sup>, at the start of the next financial year. We therefore deny the allegations contained in paragraphs 2, 3, 5, 6, 8, 9, 10, 11, 12, 14, 15, 16, 17 and 19 of the application.

That having been said, the Teamsters are happy to see that their involvement has already given results in that FXG is finally ready to give raises after two years without one. During this same period, Teamsters members working at UPS and Purolator have enjoyed good raises. In fact, if FXG really wanted to treat its employees fairly, it would give them pay and benefits at least equal to what UPS and Purolator employees enjoy.

We therefore do not oppose FXG's decision to give a pay raise to its package handlers employees as long as it is uniformly applied, to everyone everywhere and not used as a thank you gift for anti-union employees or as an otherwise anti-union tool. We understand from

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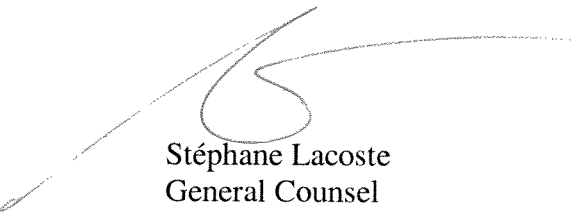
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the application that the raises will be retroactive to February 28, 2010 just as they are in the USA.

A copy of the present letter is sent today to Mr. J. Timothy Lawson, attorney for FedEx Ground Package System, Ltd.

Yours very truly,



Stéphane Lacoste  
General Counsel

SL/sc