



December 4, 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\$82.1 billion. The purpose of this letter is to provide the IASB with our views with respect to a delay in the effective date of the proposed revenue recognition standard.

As the IASB knows, this standard will require significant systems changes to billing and other systems and either the creation of new data warehouses to calculate and post revenue or the implementation of a revenue solution from the ERP providers. At least eighteen months is needed to plan and implement those changes. The new systems then will need to be run in parallel with the existing systems so that at least one, and preferably two, years of comparative information is available in the year the standard becomes effective. This comparative information will be critical to explaining results to our stakeholders and for budgeting and planning purposes.

With the delays in the issuance of the final standard, we believe the timeline is now too short to meet a January 1, 2016 go live date for the comparative information. Past experience has taught us that it is imprudent to begin systems work before the final standard is issued as small changes can have significant system impacts.

We urge the IASB to extend the effective date of this standard to January 1, 2018 to allow us sufficient and appropriate time to complete this complex implementation. Please do not hesitate to contact any one of us if you have questions.

Yours truly,

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

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

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