

**From:** [Kam Olfert](#)  
**To:** [Drew Krainyk](#); [james wilson](#); [Marion Lafrenier](#)  
**Cc:** [Brent Dergousoff](#); [Devin Dubois \(devin.dubois@gmail.com\)](#)  
**Subject:** Re: PCC case 16 -70 Reimer/Advertising Concern  
**Date:** Friday, November 18, 2016 3:04:59 PM

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I agree with this approach. Do we ask the ARC committee to handle this communication with the Members? Can we do it? or can we simply ask Marion/Bernie to handle it? (saves the bureaucratic step of going from PCC committee to ARC committee - which will add 2 months to the process).

Kam

**From:** [Drew Krainyk](#)  
**To:** [james wilson](#); [Marion Lafrenier](#)  
**Cc:** [kam olfert](#); [Brent Dergousoff](#); [Devin Dubois \(devin.dubois@gmail.com\)](#)  
**Subject:**  
**Date:** Friday, November 18, 2016 1:03:07 PM

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That looks fine to me as well.

As for what we can do to resolve the other non-compliers and to prevent us from having to enforce so many penalties (and look like we are on a witch hunt) I say we send out a completely separate email from Jerod that basically says the policy for the 140 characters and specifically references google and what it can and can't say in the google findings. I honestly think many people do not understand what we mean by a search engine and the difference between the first 140 characters vs what is allowed in the rest of the website. If we can spell it out in black and white I think it will help. Maybe even set a deadline (February 28th) by which all must be compliant. It does not mean that ARC needs to start checking them March 1st but it would add some urgency for people.

Drew

**To:** [Marion Lafrenier](#)  
**Subject:**  
**Date:** Friday, November 18, 2016 10:21:38 AM

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> Hi all,

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> I have made the changes in the draft C2C agreement based on your comments and recommendations. Please review the draft document and let me know if you agree with the draft c2c as written or if any edits required.

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> FYI - All Direct West Yellow Pages Advertising Review Forms (sent to each member) throughout 2016 included this reminder:

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> "The ARC would like to remind members that the content of display advertisements that are listed as search results in the various search engines must comply with the CDSS Advertising Bylaws/CDSS Advertising Standard/Guidelines. A review of such on-line advertising would be prudent for members to reduce the possibility of future advertising concerns relating to such on-line searches".

I will have Jerod publish the same reminder (once again) in the next CDSS Newsletter. Are there any other suggestions from the committee that might help with getting the message out there!

> Please let me know.

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> Thanks,

> Marion

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**From:** [Jim Wilson](#)  
**To:** [kam olfert](#)  
**Cc:** [Drew Krainyk](#); [Marion Lafrenier](#); [Brent Dergousoff](#); [Devin Dubois \(devin.dubois@gmail.com\)](#)  
**Subject:** **Date:** Wednesday, November 9, 2016 9:55:45 PM

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I think Drew makes some good points. Maybe we need to step back on this one. In light of the fact that so many websites would be in violation and the ARC could not possibly police them all without a complaint being brought forward, perhaps Kam's suggestion of a generalized warning to all members might be in order. Once all members are aware of the 140 characters of a website being external advertising, and a "grace period" of 60 days to correct any violations, then ARC and PCC would be able to penalize those who continue to violate and issue justifiable penalties. We might be a little heavy-handed if it has not been made broadly clear as to the rules on website, particularly when so many websites appear to be in violation as Drew has found. Members should be made aware that not the entire website is internal marketing if they are not aware already and a definite, specific reminder if they are aware. They could thus be proactive rather than waiting for a complaint that brings them to our attention. Might decrease ARC and PCC workload in this area!

Jim

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**From:** [Kam Olfert](#)  
**To:** [Drew Krainyk](#)  
**Cc:** [Marion Lafrenier](#); [Brent Dergousoff](#); [james wilson](#); [Devin Dubois \(devin.dubois@gmail.com\)](#)  
**Subject:**  
**Date:** Wednesday, November 9, 2016 9:31:12 PM

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Very good reasoning Drew and I do agree with the lesser penalty. My big concern is that by your search dentists are so non-compliant currently! Maybe the college should just send out a general warning, and (which Sask valley would receive) then we could penalize no one within a grace period (60days or so).

I know someone complained here but it seems unfair to penalize Sask valley if others are also in violation - and we know about it!

Kam

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**From:** [Drew Krainyk](#)  
**To:** [kam olfert](#)  
**Cc:** [Marion Lafrenier](#); [Brent Dergousoff](#); [james wilson](#); [Devin Dubois \(devin.dubois@gmail.com\)](#)  
**Subject:**  
**Date:** Wednesday, November 9, 2016 9:06:26 PM

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I am going to play Devil's advocate a little here just because even the ARC has admitted that policing the 140 characters on google is next to impossible as it can change so frequently:

I do think their office was in the wrong, but I could make an argument for a slightly more lenient C2C than what we typically give for a second offence (on that topic I thought that we saved the apology for a third offence).

The reason for me putting forward some type of leniency is two-fold

1. While in the C2C in 2014 it said that all external advertising needs to be reviewed (and by definition the first 140 characters of a website is considered external advertising), I can definitely appreciate the oversight on their behalf on not having the first 140 characters of the website approved based on the fact that many members believe that the entire website is internal marketing. I think we could clarify this going forward by always writing it out to take any oversight out of it.

2. I just googled Saskatoon Dentists and I believe that every office that came up in the first page is in violation. Several of these offices have had C2Cs in the last year so would be in violation of their 2 year window. I also googled Regina Dentists and not nearly as many were in violation.

I know the whole reasoning behind Advertising C2Cs is to have a systematic approach to 1st offence, 2nd offence, etc. but I think this could be one where we could show some leniency due to the timeline and the fact that relative to the rest of the members it is not a very significant infraction.

If we wanted to be more lenient I would suggest \$2000.00 and 2 years of review of all external advertising and the first 140 characters.

Drew