

THE COMPETITION TRIBUNAL

IN THE MATTER OF THE COMPETITION ACT, R.S.C. 1985, c. C-34, as amended;

AND IN THE MATTER OF an inquiry pursuant to subsection 10(1)(b)(ii) of the Competition Act relating to certain marketing practices of Sears Canada Inc.;

AND IN THE MATTER OF an Application by the Commissioner of Competition for an order pursuant to section 74.10 of the Competition Act;

AND IN THE MATTER OF Sears Canada Inc.'s opposition to the Application and Sears Canada Inc.'s request for certain relief from the Competition Tribunal.

BETWEEN:

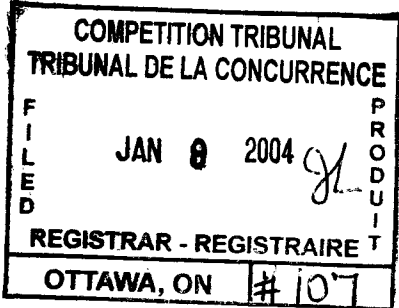
THE COMMISSIONER OF COMPETITION

Applicant

- and -

SEARS CANADA INC.

Respondent



AFFIDAVIT OF DR. KENNETH R. DEAL

I, Kenneth R. Deal, of the City of Hamilton, Province of Ontario,

SWEAR THAT:

1. I have prepared this Affidavit supplemental to my Affidavit of September 22, 2003 ("my original Affidavit")

COMPETITION TRIBUNAL
TRIBUNAL DE LA CONCURRENCE

19

File No. **CT-2002-004**
Commissioner of Competition vs Sears Canada Inc.

Exhibit No.: R 147

Filed on: January 21, 2004

Registrar: Joe Farose

2. Further to service of my original Affidavit, counsel for the Commissioner requested further information regarding the survey and methodology. Attached hereto and marked as Exhibits "A", "B" and "C" is the Commissioner's correspondence dated October 2, October 29 and December 12, 2003, requesting the further survey information.

3. In response to these inquiries, information was provided by correspondence dated October 3 and October 31, 2003, which information I verily believe to be true, and by way of this supplemental Affidavit. The correspondence dated October 3 and October 31, 2003, is attached hereto as Exhibits "D" and "E" respectively.

THE SEARS SURVEY METHODOLOGY

4. **Study Population.** The study population was defined as customers who were known to have bought at least one tire from the five lines of tires in issue (Roadhandler T Plus, BF Goodrich Plus, Weatherwise, Response RST Touring 2000 and Silverguard Ultra IV) from Sears Canada Inc. ("Sears") in 1999.

5. **Sample Frame.** Sears provided the list of customers from which the sample was drawn. The sample frame was comprised of lists totalling 42,252 customers from 28 Sears stores across Canada. Not all Sears stores were represented since records in electronic format were not available from all Sears stores for the relevant tires. The following 28 stores were included in the survey: **Ontario** - Brampton, Brantford, Burlington, Hamilton, Markham, Oshawa, Ottawa – Carlingwood, Sarnia, St. Catherines, Sudbury; **New Brunswick** -

St. John; **Alberta** - Calgary – North Hill, Chinook, Edmonton - Boon Doon, Lethbridge; **B.C.** – Burnaby, Chilliwack, Langley, Richmond, Surrey, Victoria; **Quebec** – Alma, Brossard, Fleur De Lys, Hull, Place Laurier, Sherbrooke, St. Bruno.

6. **The Sample.** The sample for interviewing was drawn randomly from the sample frame by Opinion Search Inc., a reputable marketing research field house. The simple random sample was not limited by quotas of any kind other than a total sample size of 601.

7. **Overall accuracy of the study findings.** The findings from this sample of 601 respondents are representative of the full population of Sears customers who bought at least one tire of the five lines of tires in issue in 1999 and are accurate within plus or minus 4.0 percentage points, in 19 out of 20 samples (i.e., at the 95% confidence level). This confidence margin for the total sample is a maximum and might be more accurate for some calculations. The margin of error stated is plus or minus 4 percentage points if the proportion being estimated is centered at 50% (0.50). As the proportion deviates from 0.50, the confidence interval is in fact tighter than plus or minus 4 percentage points. For some questions, all 601 respondents provided answers and in other cases fewer than 601 respondents provided answers. However, for many questions the proportion measured was significantly different from 0.50, consequently in those

cases the confidence interval would have been tighter than plus or minus 4 percentage points when all respondents answered those questions.

8. **Data Collection Methodology.** The study findings are based on telephone interviews conducted by Opinion Search Inc. of Ottawa, Ontario with a random sample of 601 1999 Sears customers of the five tire brands in issue between August 27th and September 2nd, 2003. Data were collected using a Computer Assisted Telephone Interviewing (CATI) system. The interviewers were professionally experienced and trained to conduct interviews according to generally accepted principles of marketing research and to follow the code of conduct and ethics of the Professional Marketing Research Society (PMRS) and the Canadian Association of Marketing Research Organizations (CAMRO).

9. **Pretest.** Prior to the finalization of the questionnaire, a pretest was conducted by Opinion Search Inc. using their CATI system on August 26, 2003. The CATI system allowed me to listen to several of the interviews being conducted with respondents. The core questions seemed to be understood by the respondents and they were able to make considered direct responses to the questions. The introduction to the questionnaire was altered in order to more efficiently introduce the respondents to the core questions. The responses to the pretest were discarded and were not included in the final sample of 601 customers.

10. **Qualification of Contacted Customers.** All respondents contacted were Sears customers who were listed in Sears' records as having purchased at least one new replacement vehicle tire from one of the five lines in issue from Sears in 1999. Customers who were employed by a company that manufactures, distributes or sells tires for passenger cars, trucks or minivans, or that are engaged in marketing research, advertising, public relations, news media or law, were excluded from the study.

11. **Sponsorship.** The interviews were completed in a blinded fashion, i.e., sponsorship by Sears was not revealed to respondents during the interview. The interviewers simply introduced themselves in the introductory dialogue as employees of Opinion Search, a marketing research firm.

12. **Attempts to Contact Selected Customers.** Up to eight telephone calls were made in an attempt to obtain an interview with a qualifying customer when the selected individual was not available during the initial call.

13. **Disposition of the Sampling and Fieldwork.** The work of Opinion Search Inc. in attempting to complete the survey is represented in the following table.

Report on Disposition of the Sampling and Fieldwork

Sears Canada (Customer Retail Ads - August 2003

A (1-14)	Total Attempted	9631
1	Not in service (disp 4,44,47)	1073
2	Fax (disp 10,46)	130
3	Invalid #/Wrong# (disp 9,12,13,43,77,88)	901
B (4-14)	Total Eligible	7527
4	Busy (disp 2,42)	195
5	Answering machine (disp 3,8,45)	1386
6	No answer (disp 1,41,48)	1485
7	Language barrier (disp 11)	153
8	Ill/Incapable (disp 14)	35
9	Eligible not available/Callback (disp 6,7,40)	1271
C (10-14)	Total Asked	3002
10	Household refusal (disp 15,21)	823
11	Respondent Refusal (disp 22,23,89)	1272
12	Qualified Termination (disp 24)	31
D (13-14)	Co-operative Contact	876
13	Not Qualified (disp 30-39,50,25,27)	275
14	Completed Interview (disp 20)	601
	REFUSAL RATE	70.82
	(10+11+12) / C	
	RESPONSE RATE	11.64
	D (13-14) / B (4-14)	
	INCIDENCE*	69.68
	$[(14+12) / (13+14+12)] * 100$	
	$[(CI+QualTM)/(NQ+CI+QualTM)] * 100$	

*PMRS does not have a standard Incidence calculation

Disposition Report

6798 03/ 27-Aug

9:00

9631 INTERVIEWS
601 COMPLETED INTERVIEWS

9631 100.00% TOTAL

INT


601	6.24%	20	COMPLETED INTERVIEW
1485	15.42%	1	No Answer
195	2.02%	2	Busy Line
1386	14.39%	3	Answering Machine
1073	11.14%	4	Not In Service
1174	12.19%	6	GENERAL Callback
97	1.01%	7	SPECIFIC Callback
0	0.00%	8	MESSAGE LEFT on Answering Machine (PROJECT SPECIFIC!)
94	0.98%	9	Changed #/New # Out-of-Province (PROJECT SPECIFIC!)
130	1.35%	10	Fax / Modem / Pager
153	1.59%	11	Language Barrier (Not Eng/Fr or is Deaf)
2	0.02%	12	Duplicate Record (this WAVE/exact survey)
176	1.83%	13	Invalid # - Business
35	0.36%	14	Incapable of completing (ill/away/deceased)
5	0.05%	15	Call Privacy
818	8.49%	21	HOUSEHOLD REFUSAL
1200	12.46%	22	RESPONDENT REFUSAL
43	0.45%	23	NON-QUALIFIED Termination
31	0.32%	24	QUALIFIED Termination
1	0.01%	25	NON-QUALIFIED Quota Cell Full (PRE-SCREEN/CALL)
0	0.00%	26	QUALIFIED Quota Cell Full
38	0.39%	30	NQ - Works in Industry
0	0.00%	31	NQ - Never owned vehicle on list
0	0.00%	32	NQ - Incorrect Model year
0	0.00%	33	NQ - Never bought replacement tires for car on list
0	0.00%	34	NQ - Termination at Q3B
0	0.00%	35	NQ - Never owned vehicle on list
0	0.00%	36	NQ - Did not buy replacement tires for year specified (Q5)
0	0.00%	37	NQ - Bought replacement tires more than 5 years ago (Q6)
0	0.00%	38	NQ - Didn't buy tires at Sears
0	0.00%	39	NQ - Didn't buy one or more replacement tires
236	2.45%	50	NQ - Did not purchase tires from Sears in 1999
0	0.00%	40	PD - Callback
0	0.00%	41	PD - No Answer
0	0.00%	42	PD - Line Busy
0	0.00%	43	PD - Operator
0	0.00%	44	PD - Aborted
0	0.00%	45	PD - Answering Machine

0	0.00%	46	PD - Fax / Modem
0	0.00%	47	PD - No Signal
0	0.00%	48	PD - Heard Phone Being Hung Up
590	6.13%	77	Wrong Number / Weird Sample
39	0.40%	88	Misc./See Supervisor (Get supervisor OK & please specify
29	0.30%	89	Respondent Never Wants to be Called Again

14. I swear this Affidavit supplemental to my original Affidavit and for no other or improper purpose.

SWORN BEFORE ME in the City of)

Hamilton)
in the Province of Ontario)
this 22 day of December, 2003.)


) Dr. Kenneth R. Deal
)


) _____)
A COMMISSIONER, ETC.

**ERIN LOUISE MILLER, a
Commissioner, etc., Province of Ontario,
while a student-at-law.
Expires May 8, 2005.**



Ministère de la Justice
Canada

Department of Justice
Canada

Droit de la concurrence
Place du Portage, Tour I
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50, rue Victoria
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K1A 0C9

Competition Law Division
Place du Portage, Phase I
22nd floor
50 Victoria Street
Hull, Quebec
K1A 0C9

Téléphone/Telephone: -819
Télécopieur/Facsimile: (819) 953-9267
Courriel/Email:

October 2, 2003

Notre référence / Our file:

By Facsimile

Mr. William W. McNamara
Ogilvy Renault
Barristers & Solicitors
Suite 2100, P.O. Box 141
Royal Trust Tower, TD Centre
Toronto, Ontario (M5K 1H1)

This is Exhibit..... "A"referred to in the
affidavit of..... KENNETH R. DEAL.....
sworn before me, this..... 22ND.....
day of..... DECEMBER..... 20.03.....


.....
A COMMISSIONER FOR TAKING AFFIDAVITS

Dear Mr. McNamara:

Re: Commissioner of Competition v. Sears Canada Inc.

Our experts are in the process of preparing rebuttal reports. In that connection, with respect to the Report of Dr. Kenneth Deal, please provide us with a supplemental affidavit setting out the full details of the methodology employed in the survey, and in particular setting out answers to the following questions as soon as possible and, in any event, no later than 5 p.m. on Friday, October 3:

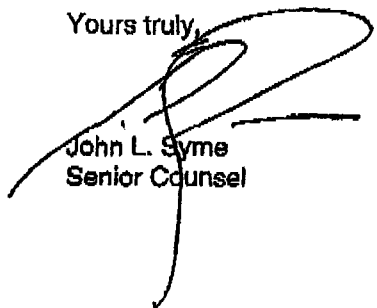
1. In paragraph 14 of his Report, Dr. Deal states that, "The study findings are based on telephone interviews with a random sample of 601 Sears customers ..." Please advise as to, for purposes of the survey, the total number of people with whom a contact was attempted but was unsuccessful.
2. In paragraph 15 of his report, Dr. Deal states, in part, as follows:

"The sample was randomly drawn from a list of customers who were known to have bought new replacement vehicle tires from Sears in 1999. Sears provided the list of customers from which the sample was drawn. The findings from this sample of 601 respondents are representative of the full population of Sears customers who bought tires in 1999.....".

 - (a) How did Sears assemble the list of customers it provided? Did the list include all Sears customers who purchased tires from Sears in 1999? If not, who did it include and who was excluded? Did they include those persons who purchased using all methods of payment in equal proportions?

- (b) Did the list provided by Sears include purchasers of both Sears' private label tires (including Sears exclusives and dual branded), and those who purchased national brand tires from Sears? If so, were purchasers of national brand tires excluded for purposes of the survey; when Opinion Search Inc. drew the names from the Sears' list; when the survey was conducted; when the results were compiled or analyzed, or at some other time?

Yours truly,



John L. Syme
Senior Counsel

c.c. S. Scholtz
S. Rothfels
P. Kennedy



Ministère de la Justice
Canada

Department of Justice
Canada

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Competition Law Division
Place du Portage, Phase I
22nd floor
50 Victoria Street
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Téléphone/Telephone: (819) 956-4227
Télécopieur/Facsimile: (819) 953-9267
Courriel/Email: hyder.arsalaan@cb-bc.gc.ca

October 29, 2003

Notre référence / Our file: 2260-6

BY FACSIMILE

Ogilvy Renault
Barristers & Solicitors
Suite 1600
45 O'Connor St.
Ottawa, ON, K1P 1A4

Attention: Mr William McNamara

Dear Mr. McNamara:

Objet/ Re: Commissioner of Competition v. Sears Canada Inc.

Please provide the Commissioner with a detailed description and any documentation relating to the methodology employed in conducting the survey set out in the expert affidavit of Mr. Kenneth Deal, including but not limited to:

1. Please provide a detailed description of the sampling approach. The description should address the following:
 - a) What was the target population? Specifically, was the target population "all purchasers of the five tire lines in issue in this matter"?
 - b) What was the survey population? Specifically, was the survey population the same as the target population or were there exclusions from the target population, i.e., persons in the target population that did not have a chance to be selected in the sample?
 - c) What sample design was used (e.g., simple random sampling, stratified sample design, random digit dialing, etc.)? Was a probability sample design used?
 - d) What was the initial sample size? Was it 9631 as indicated in the Scholtz letter or something different?
 - e) How was this sample selected? Was the sample design properly implemented?

This is Exhibit.....^{"B"}.....referred to in the
affidavit of.....KENNETH R. DEAL.....
sworn before me, this.....22ND.....
day of.....DECEMBER.....2003.....
.....
A COMMISSIONER FOR TAKING AFFIDAVITS

- f) What was the probability of selection at each stage of sample selection?
 - g) Which Sears' stores made up the sample?
 - h) From what list was the sample selected?
2. Please provide a description of the sampling frame (i.e., the list from which the sample was selected), including
- a) How and when was the list created?
 - b) What was the total count of persons on the frame?
 - c) Did the frame contain survey units (e.g., names of persons) that were not part of the target population? If so, how many?
 - d) Did the frame exclude survey units (e.g., names of persons) that were part of the target population? If so, how many?
 - e) What measures were taken to ensure that complete, accurate, and up-to-date information was contained in the frame?
3. From the information on the frame were you able to identify the purchasers of the five tire lines in issue in this matter? If so, how were such purchasers identified? How many such purchasers were on the frame?
4. When a potential respondent was contacted, was there an effort made by the interviewer to ascertain whether or not the person actually purchased one or more of the five tire lines in issue in this matter? If so, what were the interviewer instructions regarding how to obtain and record this information?
5. Was there an effort to analyze the results to assess the potential bias due to non-response? If so, please describe the analysis that was performed and/or please provide the relevant report.

We would appreciate it if you could provide us with the above records and information by close of business Friday October 31, 2003.

Yours truly,



Arsalaan Hyder

AH/mh
encl.



Ministère de la Justice
Canada

Department of Justice
Canada

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Télécopieur/Facsimile: (819) 953-9267
Courriel/Email: syme.john@cb-bc.gc.ca

December 12, 2003

Notre référence / Our file: 2260-6

Mr. Stephen A. Scholtz
Ogilvy Renault
Suite 1100, P.O. Box 11
200 King Street West
Toronto ON M5H 3T4

This is Exhibit "C" referred to in the affidavit of KENNETH R. DEAL sworn before me, this 22nd day of DECEMBER 2003.

[Signature]
A COMMISSIONER FOR TAKING AFFIDAVITS

Dear Mr. Scholtz:

Objet/ Re: Commissioner of Competition v. Sears Canada Inc.

I write further to your letter of November 24, 2003, in which you advised that you intend to enter into evidence through Dr. Deal the correspondence exchanged between counsel regarding the survey which underpins Dr. Deal's September 19, 2003 expert report (the "Deal Report"). In your letter you requested that we advise you whether or not we would have any objection to that correspondence being entered into evidence through Dr. Deal.

It is the Commissioner's position that the referenced correspondence should not be entered into evidence. Rather, in our view Sears should serve and file a supplementary affidavit of Dr. Deal in which a complete description of the methodology employed in performing the survey is set out. This is consistent with the position we took in our October 2 letter to Mr. McNamara and our October 29 letter to you. The information contained in your letters of October 3 and 31 would form part of any such affidavit.

We are also of the view that among the points that should be addressed in any such affidavit are the following:

1. What firm or organization conducted the telephone interviews referred to in paragraph 14 of the Deal Report?
2. Were any "pre-" or "test" surveys done prior to the final survey?
3. Specifically, which 28 Sears' Automotive Centres formed the basis of the list from which the survey sample was drawn (eg. Sears, Carlingwood, Ottawa).

If Sears is not prepared to provide the Commissioner with a supplementary affidavit of Dr. Deal as described above, we nonetheless request that Sears provide us with a response to the foregoing points (1-3) as soon as possible and, in any event, no later than 5:00 p.m. on

Wednesday, December 17. If you are not willing to provide the supplementary affidavit, we may bring a motion to compel production.

This letter is written without prejudice to any objection or other claim that the Commissioner may wish to raise in connection with the Deal Report or Dr. Deal's testimony in this matter.

Yours truly,



for

John L. Syme
Senior Counsel

JS/mh

cc. William W. McNamara

OGILVY RENAULT

Direct Dial: (416) 216-4030
Direct Fax: (416) 977-5239
sscholtz@ogilvyrenault.com

BY TELECOPIER

October 3, 2003

John L. Syme, Esq.
Legal Counsel
Department of Justice
Legal Services, Industry Canada
Competition Law Division
Place du Portage, Phase 1
50 Victoria Street
Hull, Quebec K1A 0C9

Dear Mr. Syme:

Re: Sears Canada Inc.

I am writing in response to your correspondence to Mr. McNamara dated October 2, 2003, requesting further information on the survey conducted by Dr. Kenneth Deal.

I am unaware of any requirement to provide a Supplemental Affidavit regarding the information you request. In any event, the deadline of 5:00 p.m. today that you have unilaterally imposed is not acceptable.

However, in an attempt to provide you with the information you have requested in a timely manner, we have made certain inquiries, and can advise as follows:

1. In response to issue 1, Dr. Deal has provided the attached "Report on Disposition of the Sampling and Fieldwork";
2. In response to issue 2, the list of customers that was provided to Dr. Deal did not include all purchasers of all tires from Sears in 1999. The customer list included only purchasers of the five tire lines in issue in this matter. For logistical reasons, those stores that did not have 1999 customer lists in

This is Exhibit..... "D".....referred to in the
affidavit of.....KENNETH R. DEAL.....
sworn before me, this.....22ND.....
day of.....DECEMBER.....20.03..


A COMMISSIONER FOR TAKING AFFIDAVITS

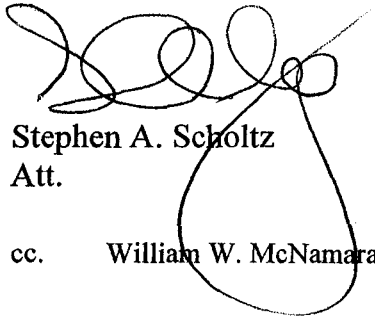
John L. Syme, Esq.

- 2 -

October 3, 2003

electronic format were also not included in the customer list. The lists were not adjusted to equalize proportions of payment methods.

Yours truly,



Stephen A. Scholtz
Att.

cc. William W. McNamara

Report on Disposition of the Sampling and Fieldwork

Task	Result
Interviewers attempted to contact	9631
# of phone numbers that were found to be not in service, fax numbers, or invalid or wrong numbers	1104
Total Eligible to be Interviewed	7527
Numbers that were busy, answering machine, no answer, language barrier, respondent was ill or incapable or eligible but requested callback	4525

OGILVY RENAULT

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sscholtz@ogilvyrenault.com

BY TELECOPIER

October 31, 2003

Arsalaan Hyder
Department of Justice, Canada
Competition Law Division
Place du Portage, Phase 1
22nd Floor
50 Victoria Street
Hull, Quebec K1A 0C9

This is Exhibit..... "E"referred to in the
affidavit of..... KENNETH R. DEAL
sworn before me, this..... 22ND
day of..... DECEMBER 20.03

.....
A COMMISSIONER FOR TAKING AFFIDAVITS

Dear Mr. Hyder:

Re: *Commissioner of Competition v. Sears Canada Inc.*

Further to your correspondence of October 29, 2003, to William McNamara regarding the methodology employed in the survey set out in Dr. Deal's affidavit, we have made inquiries and have been advised as follows in response to your questions:

1.

- (a) The target population was all Sears customers who purchased from or more of the five tire lines in 1999.
- (b) The survey population was 42,252. There were exclusions from the target population as indicated in my earlier correspondence of October 3, 2003. See also answer to 2(a) below.
- (c) Simple random sampling was used. A probability sample design was used.
- (d) The sample size was 601. Contrary to the assertion in your letter, my earlier correspondence did not indicate otherwise.
- (e) As indicated above, simple random sampling was used. The sample design was properly implemented.

**OGILVY
RENAULT**

- 2 -

- (f) 1 in 42,252.
- (g) 28 Automotive Centres (located in Quebec, British Columbia, Alberta, New Brunswick and Ontario).
- (h) Sears customers who purchased from one or more of the five tire lines in 1999 from the 28 Automotive Centres described in (g) above.

2.

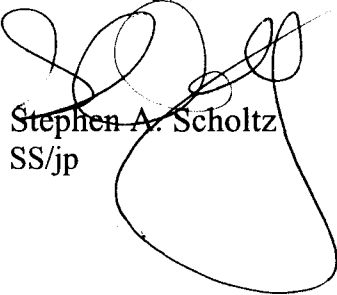
- (a) The list was created in 2003 from those Automotive Centers which had electronic records from 1999 from which the purchasers of the five tire lines in issue could be extracted.
- (b) 42,252.
- (c) No.
- (d) Yes, Sears customers who did not purchase the tires in issue in 1999 from one of the 28 Automotive Centers described in 2(a) above were excluded.
- (e) See 2(a) above.

3. Yes, the frame only included purchasers of the five tire lines in issue in 1999. There were 42,252 such purchasers in the frame.

4. The frame only included purchasers of the five tire lines in issue in 1999.

5. No.

Yours truly,



Stephen A. Scholtz
SS/jp

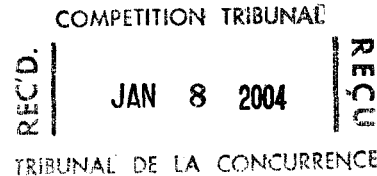
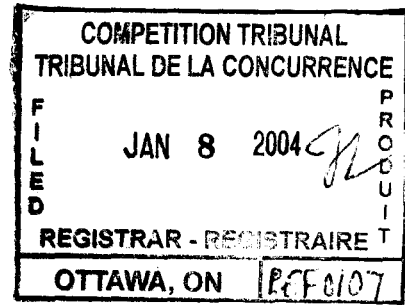
OGILVY RENAULT

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mhealey@ogilvyrenault.com

SENT BY COURIER

Ottawa, January 8, 2004

Mr. Joseph LaRose
Acting Registry Officer
Competition Tribunal
Thomas D'Arcy McGee Building
90 Sparks Street, Suite 600
Ottawa, Ontario K1P 5B4



Dear Mr. LaRose:

RE: Supplementary Affidavit of Dr. Kenneth R. Deal

Further to our telephone conversation on January 7, 2003, please find enclosed, for filing with the Tribunal, five (5) copies of the Supplementary Affidavit of Dr. Kenneth R. Deal, sworn December 22, 2003. A copy of this affidavit has been provided to Mr. Syme, Counsel to the Commissioner. The Commissioner has consented to the filing of this affidavit and has retained the right to file a rebuttal affidavit.

Based on our conversation, we will not file formal motion materials at this time to seek leave to file the Supplementary Affidavit. However, we are prepared to file formal motion materials should they be required.

As this affidavit is supplementary to Dr. Deal's original affidavit (previously filed with the Tribunal) we would ask you to bring it to the attention of Madam Justice Dawson upon receipt.

Should you have any questions, please contact the undersigned.

Yours very truly,

Martha Healey

KPK/mg

Encl.

cc: William W. McNamara, *Ogilvy Renault* (without attachments)
Stephen A. Scholtz, *Ogilvy Renault* (without attachments)

Barristers & Solicitors
Patent & Trade-Mark Agents

Suite 1600
45 O'Connor Street
Ottawa, Ontario
Canada K1P 1A4

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Continuing the practices of
Meighen Demers
Ogilvy Renault
Swabey Ogilvy Renault

Montréal • Ottawa • Québec • Toronto • Vancouver • London (England)

John L. Syme, *Department of Justice, Competition Law Division* (without attachments)