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RE: Address requirement for e-business registration. Registration No. 32842315

Thursday, 31 July 2002

Dear Ms. Poon,

Pursuant to our recent telephone conversation I am writing to explain my position with regard to the use of my post office box as my formal business address, and to request a legal basis for your refusal to permit me.

My position is based on the following two points:

- 1) Requiring that business proprietors use their place of residence as their business address, when they do not require an address different from their residence in order to conduct their business, is
 - a) potentially damaging, because it compels business proprietors who work out of their homes to make their residential addresses available to the general public.
 - b) unfair, because business proprietors who have business addresses other than their place of residence need not provide their private addresses to the general public.
 - c) unethical, because it moves contrary to the principle of separation of one's business life from one's private life. In short it invades one's privacy.

- 2) We live in a day and age which is moving increasingly toward the internet as a place to do business. In short, there are many businesses today whose entire business activity, with perhaps the exception of an occasional meeting, takes place on the internet. Requiring proprietors such as myself to let office space in order to protect their privacy is
 - a) financially burdensome, because it raises the hurdle required to start a new business, and
 - b) economically inefficient, because it forces proprietors to rent or purchase space for which they have no real business need.

In times of economic downturn, such as we have today, your department's policy encourages unemployment and hinders economic growth.

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- 3) In principle there is little difference between a post office box and office space. They are both physical addresses, which provide government and business with a reliable and secure means to establish contact with proprietors.
- 4) A common sense definition of one's place of business would be that place where the majority of one's business is conducted.

Technically speaking the only things that I require to conduct by business are an internet provider (a virtual business address), a postal address to receive correspondence, a telephone, a computer and modem to receive, store, process, and send information, and a place to put my computer that will allow me to connect to my internet provider. In effect, my business could be conducted in a public library, a coffee shop, at a train station, or even in a bus as I move from one location to the next.

Having outlined for you the essential points of my argument it is my sincere hope that you will now provide me with a legal basis for your own interpretation of the law, and a sound justification for what appears to me detrimental governmental policy toward a prosperous economy and healthy e-business community.

Sincerely,

R. A. Stegemann