

**TELECOM NOTICE OF CONSULTATION
CRTC 2024-293/293-1**

***Call for Comments – Making it easier to choose a
Wireless phone or Internet service – Enhancing customer
notification***

COMMENTS

OF

CANADIAN TELECOMMUNICATIONS ASSOCIATION

February 14, 2025

Executive Summary

1. The Canadian Telecommunications Association (CTA) and its members agree with the Commission on the importance of engaging transparently with customers. This includes ensuring that customers and potential customers are aware of service providers' latest offerings and their rights and obligations at the end of a contract commitment period.
2. They do this through a variety of means, including advertising, direct marketing, and making information about plans easily accessible on product websites, in stores, and through customer service representatives. Pursuant to the Wireless Code¹ and Internet Code², they also provide customers who are on fixed-term contracts with written notice, at least 90 days prior to the end of the initial commitment period, of information about what happens at the end of the commitment period and that as of that date they can switch plans, change service providers, or cancel their service without penalty.
3. The main difference between what is required under the Wireless and Internet Codes and what is required under the new section 27.02 of the *Telecommunications Act* is that “for the purpose of assisting the subscriber selecting a new telecommunications service plan”, the CRTC is given discretion to determine criteria for informing customers on fixed-term contracts about other service plans offered by the service provider. Additionally, subsection 27.02(3) requires service providers to provide customers on fixed term contracts with “information relating to the self-service mechanism referred to in section 27.01.”
4. Mandating that the 90-day notice include information about current in-market plans that best align with the customer’s current level of service is impractical and does not reflect customers’ evolving needs. Recommending plans based on current service levels assumes static usage patterns and overlooks prospective needs, potentially leading customers to choose suboptimal plans. The dynamic and competitive nature of the telecom market means that plans change frequently. Plan information sent 90 days before the end of a contract may become outdated by the end of term, causing confusion and dissatisfaction among customers. For these reasons, the

¹ <https://crtc.gc.ca/eng/phone/mobile/codesimpl.htm>

² <https://crtc.gc.ca/eng/internet/codesimpl.htm>

administrative and financial burdens that would be placed on service providers to develop complex and costly systems and processes to try to identify and include a specific plan in the 90-day notice far outweigh any potential benefits to customers.

5. The section 27.02 requirement to provide customers with a list of plans can most efficiently and meaningfully be accomplished by requiring the 90-day notice to include information on how the customer can find their service provider's latest in-market plans so when they are eligible to change plans, they can choose the plan that best meets their current or future needs. This is best done by referring the customer to the service provider's product website, retail store, or customer care telephone line or other contact methods.
6. The requirement to include information about self-service mechanisms can most efficiently and meaningfully be fulfilled by including in the 90-day notice a statement that advises customers that such mechanisms exist and where they can find them, such as through a hyperlink.
7. Service providers should not be required to include in the 90-day notice that a new service provider can cancel their service and transfer their phone number. Service providers should not be tasked with promoting or advertising services for its competitors. It is the duty of the service provider seeking new customers to inform them about features that facilitate switching providers.
8. While the other proposals to require additional information be added to the 90-day notice, such as information about financed devices or to require similar notices for customers on month-to-month plans or end of discounts or promotions, may be well intended, they are unnecessary as service providers already provide this information to customers through other means. Adding more information to the 90-day notice and adding the number of notifications that service providers must send to customers risks overloading customers with too much information, causing confusion and resulting in customer disengagement and dissatisfaction. It also adds incremental costs to service providers, which they must ultimately recover through service fees paid by consumers. This is counterproductive to the Commission's and service providers' goals of enhancing affordability for consumers.
9. We are not opposed to including in the current roaming notification a statement, where applicable, that other roaming options are available, but do not agree that additional roaming cap notifications are needed.

Introduction

10. Pursuant to the procedure outlined in Telecom Notice of Consultation 2024-293-1 - Call for Comments – Making it easier to choose a wireless phone or Internet service – Enhancing customer notification (Consultation), the Canadian Telecommunications Association provides its initial comments in this proceeding.
11. CTA is an industry association dedicated to building a better future for Canadians through connectivity. Our members include service providers, equipment manufacturers, and other organizations in the telecommunications ecosystem, that invest in, build, maintain, and operate Canada’s world-class telecommunications and broadcasting networks. Failure to address any question should not be construed as our agreement with any assertions made, or preliminary positions taken by the Commission. In addition, to the extent that any comment in this intervention conflicts with a comment of a CTA member, the comment of the member shall prevail with respect to that member.
12. We welcome the opportunity to respond to this Consultation on enhancing customer notification. We agree with the Commission on the importance of engaging transparently with customers and in this intensely competitive market our members work hard to ensure consumers have the information necessary to understand their rights and obligations under their current telecom service contracts and to make informed decisions.
13. This includes ensuring that consumers are aware of service providers’ latest offerings so that they can choose the best deal for their needs and ensuring that existing customers remain satisfied and new customers are attained. They do this through various means, including advertising, direct marketing, and making information about plans easily accessible on product websites, in stores, and through customer service representatives.
14. The evidence shows that these efforts are working and that consumers are easily finding service plans that meet their needs. For example, in a 2024 survey of 5,000 Canadians conducted by Abacus Data³, 86% of respondents that switched wireless plans in the previous twelve months said they switched to a plan, either with their

³ [Consumer Insights: Canadian Mobile Wireless Sector Providing Lower Prices and Greater Value to Canadians](#), Abacus Data, June 18, 2024.

existing provider or a new provider, that gave them better value than their previous plan. Among those that switched, 63% said they were paying less while getting more or the same services under their new plan. Another 17% said they were paying the same but getting additional services and features that weren't part of their previous plan, such as additional data, higher speeds, enhanced coverage, increased international calling and/or texting, or increased international roaming. These and other insights from the Abacus study demonstrate “the dynamic nature of consumer preferences, with customers continually evaluating and adjusting their plans to meet their changing needs and financial situations.”⁴

15. Pursuant to the Wireless Code⁵ and Internet Code⁶, Service providers also provide customers who are on fixed-term contracts with written notices at least 90 days prior to the end of the initial commitment period, advising them if their contract will be extended beyond the initial commitment period on a month-to-month basis. The notification must include: (i) the date on which the contract is set to expire; (ii) a statement informing the customer that as of that day they can switch plans, change services providers, or cancel their service without penalty; and (iii) information explaining whether or not the contract will be extended, and if not extended the proposed terms for the continuation of the service. If a device upgrade is offered to a customer, service providers must also at the time of offer explain to the customer any changes to existing contract terms if the customer accepts the new device, including any extension to the commitment period.
16. The main difference between what is required under the Wireless and Internet Codes and what is required under the new section 27.02 of the *Telecommunications Act* is the requirement to provide, “for the purpose of assisting the subscriber selecting a new telecommunications service plan”, a “list” of plans offered by the provider and information related to those plans, and “information relating to the self-service mechanism referred to in section 27.01.”
17. The current 90-day notification contains a lot of information. While a requirement to provided additional information in the 90-day notice may be well intended, there is the risk that customers will be overloaded by too much information, causing confusion and resulting in customer disengagement and dissatisfaction. This is especially the case if the information does not reflect the customer’s current or

⁴ Ibid.

⁵ <https://crtc.gc.ca/eng/phone/mobile/codesimpl.htm>

⁶ <https://crtc.gc.ca/eng/internet/codesimpl.htm>

anticipated future needs or may be out of date by the time they are able to act upon it. As such, any potential new requirements must be considered carefully to ensure that they are simple to understand, meet the current or anticipated future needs of consumers, provide information that is accurate as of the time it can be acted upon, and that is practical for service providers to implement.

18. In other words, they must be “efficient and effective” as required by the policy objective set forth in paragraph 7(f) of the *Telecommunications Act* and only implemented where market forces have not already resulted in service providers providing the desired information to their customers through one or more means.
19. This objective is especially important given the current economic realities for Canada and the telecom sector. Decreasing prices, high borrowing costs, higher network costs, increased competition from multinational OTT players, lower immigration, and climate-related risks are just a few of the headwinds that telecom providers face. At a macro-level, the threat of U.S. tariffs and other economic measures pose challenges to Canada’s economic stability and growth prospects. Even if the suspension of U.S. tariffs is extended beyond the current thirty-day reprieve, the economic uncertainties caused by an unpredictable U.S. government will remain for the foreseeable future. These measures and uncertainties are likely to have significant impacts on consumer confidence and purchasing power, which could have an impact on service providers. A weaker Canadian dollar will also negatively impact service providers who purchase telecom equipment and devices in U.S. dollars.
20. Rather than require service providers to build processes and systems to notify customers of information that is already provided to them through other means, the Commission should be looking for ways to reduce and avoid creating new regulations that result in incremental increases in costs that are disproportionate to any perceived consumer benefit. These additional costs would ultimately have to be recovered through service fees charged to consumers, which runs counter to the *Telecommunications Act*’s policy objectives of rendering affordable services⁷ and recognizing the economic and social requirements of consumers⁸.
21. In addition, including information in the 90-day or any other mandated notice about other offerings would likely be considered direct marketing. The federal anti-spam

⁷ *Telecommunications Act*, s7(b)

⁸ *Ibid*, s7(h).

legislation, also known as CASL⁹, and the CRTC's Unsolicited Telecommunications Rules (UTRS)¹⁰ prohibit service providers from contacting customer's who have asked not to be contacted with marketing or promotional offers. Therefore, any new rules must provide service providers with the flexibility to meet their obligations under CASL and the UTRS.

22. Lastly, implementing changes to current notification processes, particularly if they require customized notifications of recommended plans, will be complex and will require sufficient time to enable. An implementation period of at least 24 months from the date of the decision is recommended.

Content of the 90-day notice

Q1. What information should be included in the 90-day notice to better respond to Canadians' needs? Why?

23. In Appendix 2 (*Proposed amendments to the Wireless Code and the Internet Code*) to the Consultation, the Commission is proposing, in part, to require the 90-day notice to include the following additional information:

- iii. what other current in-market plans are offered that best align with the current level of service offered;

- iv. with respect to those plans,

- (a) All-in price, broken down into one-time fees and monthly fees including taxes;
- (b) the services included in the contract, such as voice, text, and data services, where applicable, and any limits on the use of those services;
- (c) equipment/device fees;
- (d) network coverage [Wireless Code only]; and
- (e) network or service speed.

24. In the intensely competitive telecommunications market, service providers already have every incentive to present strong and relevant offers to customers to compete

⁹ [*An Act to promote the efficiency and adaptability of the Canadian economy by regulating certain activities that discourage reliance on electronic means of carrying out commercial activities, and to amend the Canadian Radio-television and Telecommunications Commission Act, the Competition Act, the Personal Information Protection and Electronic Documents Act and the Telecommunications Act*](#) (S.C. 2010, c. 23)

¹⁰ [Canadian Radio-television and Telecommunications Commission Unsolicited Telecommunications Rules](#)

with other providers' acquisition offers, and they do so in a variety of ways, including through direct marketing and advertising. Requiring service providers to notify in-contract customers of offers that "[b]est align with current level of service" is unnecessary, impractical, will not always reflect customers current or future needs and may mislead customers as to what plan is best for them.

25. The telecom sector is a very dynamic industry, featuring ongoing innovation and changes to plan features. The range of handsets and combinations of service speeds, data and other plan features will be significantly different by the end of the commitment period compared to what a customer purchased two or more years ago. Additionally, many customers' needs will have changed over that time. For example, average mobile data usage continues to increase each year¹¹, and new plans are regularly being introduced that offer greater value, such as more data, faster speeds, and inclusive roaming.
26. Requiring service providers to recommend a plan that reflects a customer's current service level assumes past usage will remain the same, ignores prospective usage and needs, and assumes that consumers are not interested in understanding all options available to them. This could result in customers taking a plan that is too limited. As the Abacus survey referenced above shows, most consumers do not purchase a plan with the same attributes as their older plan. Presenting to them an option that reflects their current plan could lead to customers feeling misled when they find out there are other plans they could have bought that offer better value than the one recommended as the "best aligned" to their current service level.
27. Such a notification requirement may also mislead customers in another way. In the highly competitive and dynamic telecom market, plans change on a weekly, if not daily basis, as service providers respond to changing consumer demands and preferences. Plans suggested to customers 90 days or more from the end of the contract term may no longer be available at the end of the term, creating confusion and dissatisfaction for customers.
28. The proposal also overlooks the complexity and cost of creating customized notifications. Given that the information may be outdated by the time the customer wishes to subscribe to a new plan, may not address the customer's current or future needs, and may mislead the customer about available options, imposing such

¹¹ [CRTC Communications Market Reports](#)

complex and costly requirements on service providers would be unwarranted and also grossly disproportionate, as the costs in terms of time and money far outweigh any potential benefits to customers.

29. To comply with the section 27.02 of the *Telecommunications Act* requirement to inform customers about current in-market service provider plans, it is most efficient and meaningful to include information in the 90-day notice on how customers can find details about the latest in-market plans. This allows customers to choose the best plan for their current or future needs when they become eligible to change plans. This can be done by directing customers to the service provider's product website, retail store, or customer care telephone line or other contact methods.
30. Other 90-day notice information referenced in the proposed amendments to the Wireless Code and Internet Code in Appendix 2 to the Consultation are discussed in the responses to the questions below.

Q2. What criteria should be used to determine which plans service providers must inform Canadians about in the 90-day notice?

Should the Commission limit these to plans that align with their current level of service? Why or why not?

31. For the reasons stated above, the Commission should not require service providers to include information in the 90-day notice about specific service plans, including those that might align with the customers current level of service. The requirements of section 27.02 of the *Telecommunications Act* can best and most efficiently be met by requiring the notice to include information on how the customer can find information on the latest in-market plans offered by the service provider. This allows customers to choose the best plan for their current or future needs when they become eligible to change plans. This can be accomplished by referring the customer to the service provider's website, retail store, or customer care telephone line or other contact methods where they can learn about the options available to them.

Should the Commission limit these plans to “bring-your-own-device” plans or plans that include device financing for a new device? Why or why not?

32. Neither the Commission nor a service provider should presume whether a customer is interested in a BYOD plan or a plan that includes device financing. As discussed above, past usage or the customer's current service or device plan is not a predictor

of future needs. Singling out a specific plan or plans in a notice is unnecessary, impractical and does not provide the customer with all the information the customer needs to make an informed choice.

33. The purpose of the notice should be to inform the customer where they can get information about plans offered by the service provider so when they are eligible to change plans, they can choose the plan that best meets their current or future needs. This would include BYOD and device financing plans. This can best be accomplished by including in the notice a reference to the service provider's product website, retail store, or customer care telephone line or other contact methods where they can learn about the options available to them.

If the Commission allows plans that include device financing for a new device, what additional information should the 90-day notice include? Why?

34. For the reasons stated above the Commission should not require the notice to highlight specific plans. Instead, the notice should inform the customer where they can get current information about plans available at the end of their term. This way, they can choose the plan that best meets their current and future needs. This can best be accomplished by including in the notice a reference to the service provider's website, retail store, or customer care telephone line or other contact methods where they can learn about the various option for purchasing a new device.

Q3. What information should the Commission require to be included about the self-service mechanisms, considered in a separate notice of consultation as noted above, as part of the 90-day notice? Why?

35. To the extent the notice includes information about self-service mechanisms, such information should be limited to advising the customer that such mechanisms exist and where to find them, such as through a hyperlink.

Q4. When Canadians switch service providers, their new service provider can cancel their existing service and transfer their phone number from their old service provider on their behalf. Should the Commission require the 90-day notice to inform Canadians that this option is available? Why or why not?

36. The Wireless Code already requires service providers to mention in the 90-day notice that at the end of the initial commitment period the customer can switch plans, change service providers, or cancel their service without penalty.
37. Service providers should not be required to include in the 90-day notice that a new service provider can cancel their service and transfer their phone number. Service

providers should not be tasked with promoting or advertising services for its competitors. It is the duty of the service provider seeking new customers to inform them about features that facilitate switching providers.

Q5. Should the Commission require the 90-day notice to remind Canadians who have a device rental plan about the terms they originally agreed to with regard to giving the device back or having to pay the remaining balance owed on the device? Why or why not? If so, what specific information should be included?

38. Service providers already typically provide this information to customers through other means, such as reminder messages from providers, account portals, and service provider apps. Market forces naturally incentivize companies to adopt good customer service practices such as reminding customers well in advance of their options and obligations regarding devices that are subject to a financing arrangement.
39. Requiring the 90-day notice to include this additional information would make the notice longer, harder to comprehend, and potentially reduce customer engagement. It would also require additional customization, making the process more costly and complex. Imposing such a requirement when customers are already made aware of this information through other means creates unnecessary duplication that drives up costs disproportionately to the alleged consumer benefit.
40. If, notwithstanding these reasons, the Commission imposes such a requirement, the requirement should be limited to informing the customer where they can find information about returning the device or paying the remaining balance. It should not require customization for each customer, such as including balance and other information that can easily be obtained elsewhere.

Q6. Should any specific service providers or classes of service providers be exempt from this updated 90-day notification requirement? Why or why not?

41. We defer to the individual responses of each of our members.

Q7. Should the Commission require a notice similar to the 90-day notice for month-to-month plans? Why or why not?

42. No. Our concerns mentioned above regarding the proposed additional requirements for the 90-day notice, such as notifying customers of in-market offers that “align” with their current service level, apply equally to a requirement to provide such information

to customers of month-to-month plans. Such a requirement is unnecessary, impractical, and would not provide the customer with the information they need to make an informed choice about the kind of plan that would suit their current or future needs.

43. As the Abacus survey shows, when consumers choose to switch plans, they have no difficulty finding plans that suit their current needs, with 86% of survey respondents who switched plans switching to a plan that provided them with more value. Additionally, service providers already have incentive to engage with customers, including to respond to competitive offers in the market. They do this through a variety of means, including advertising and direct marketing and through engagement with customer service representatives.
44. Given the extensive advertising and direct marketing by service providers, it is hard to believe that consumers interested in switching plans are not aware of available offerings or how to find information about plans that best suit their needs. Additionally, customer service representatives are available year-round in-stores, through phone calls, or online chats to discuss what options are available to customers and answer any questions. The Abacus study shows that consumers find plans that meet their current needs without the need for mandated notices. Suggesting that an additional notice would significantly increase customer awareness beyond what is already being accomplished through competitive marketing activities is speculative and not based on evidence.

Q8. If the Commission decides to require a notice similar to the 90-day notice for month-to-month plans, how often should it be sent? Why?

45. For the reasons mentioned above, we do not think such a requirement is necessary. If a notice is mandated, the frequency of such notice should be no more than once per twenty-four months from the date when the customer purchased their current plan. This is the same time frame in which customers on fixed-term contracts receive the 90-day notice.
46. Such notice should not require the service provider to include information about service plans that “best align” with the customer’s current level of service. Like our recommendation for the 90-day notice, the notice should provide information on where the customer can get current details about current plans offered by the service provider. This way, customers can choose the plan that best meets their current and

future needs. This can best be accomplished by including in the notice a reference to the service provider's product website, retail store, or customer care telephone line or other contact methods.

Q10. Should the Commission require wireless service providers to notify customers before they reach the \$100 international roaming cap? Why or why not? If so, what thresholds should be considered?

47. The purpose of the current notice requirement is to avoid bill shock and to give the customer the opportunity to decide if they wish to continue to use international roaming services. According to the latest public opinion research commissioned by the Commission, there are “[r]elatively few (15%) subscribers who find it difficult ...to manage roaming charges.”¹² Even fewer report experiencing bill shock attributable to international travel.
48. It is reasonable to expect that these already low numbers will decline even further as competition in the market has resulted in the introduction of additional mobile wireless plans that include international roaming in various countries for no additional charge. Additionally, several service providers have indicated to the Commission they will be introducing new roaming options in 2025¹³.
49. With relatively few subscribers expressing concern regarding their ability to manage roaming charges and the market continuing to introduce plans that will further reduce the risk of incurring unexpected roaming charges, there is no reason to introduce additional notifications to customers regarding international roaming caps.

Q11. When a customer is roaming in another country, they must be notified and made aware of the associated pay-as-you-go rates. Should the Commission require wireless service providers to make the customer aware through this notice that there are packages to avoid pay-as-you-go costs/pricing? Why or why not?

50. We are not opposed to including a statement, where applicable, that other roaming options may be available. However, as these notifications would likely be considered direct marketing, any such obligation must be flexible to allow service providers to comply with their CASL and UTRS obligations.

Notification before the end of a time-limited discount or promotion

¹² [Public Opinion Research on the CRTC's Consumer Protection Codes 2024 – Final Report.](#)

¹³ [Wireless carriers tell CRTC they're already offering flexible roaming options](#), Bloomberg, November 11, 2024.

Q12. Should the Commission require that service providers notify their customers before the end of a time-limited discount or promotion? Why or why not?

51. Service providers already provide customers with notice of the end date of time-limited discounts and promotions. Discount and promotion end dates are clearly explained to customers when they purchase a plan. End dates can also be found in contracts, billing statements, and/or account portals.
52. Any notification mandate should recognize these methods as acceptable ways to fulfill such a requirement. The Commission should not require service providers to provide separate and redundant end-date notifications to customers. Customers already receive a significant number of notifications from services providers. Requiring service providers to issue separate notifications for less critical information, such as information already provided through other means, risks customer disengagement. This reduces the effectiveness of truly important customer communications.
53. A standalone notification requirement would also add to the administrative and financial costs for service providers. Imposing additional costs on service providers when customers already receive end-date notification would be inefficient regulation and contrary to the policy objectives set forth in paragraph 7(f) of the *Telecommunications Act*. It would also add incremental costs to service providers in terms of time and money. Additional costs are ultimately paid by consumers through increased service fees.

Q.13. If so, what information should be included in this notification? Why?

54. As mentioned in our response to Q.12, a separate end-date notification should not be mandated as customers are already notified of promotional end-dates through a variety of methods. Notwithstanding this, if the Commission were to mandate a redundant stand-alone end-date notification, such requirement should provide service providers with flexibility as to what information is provided in the notification.
55. For instance, where the information is already included in a customer's account portal or included in a billing statement, service providers should be allowed to simply notify the customer of the end date of the promotion and refer them to the location where they can find more information. Requiring service providers to create customized notifications for each customer that duplicates information already

provided to customers through others means creates unnecessary complexity and costs which outweighs any potential benefit to customers.

Appendix 2 – Proposed amendments to the Wireless Code and Internet Code

56. For the reasons stated above, the proposed amendments to the Codes set out in Appendix 2 to the Consultation should not be adopted. We provide our recommended changes to proposed Code amendments in the section entitled “CTA Amendments to Appendix 2” below.
57. We note that the proposed change to the Codes in Appendix 2 include the addition of a new G.6.(ii)(c)(viii) of the Wireless Code and G.5.(ii)(c)(viii) of the Internet Code that would require service providers to include in the 90-day notice an explanation of changes to existing contract terms if the customer accepts a new device or new plan. This proposed new requirement is not the subject of any the questions in Appendix 1 of the Consultation.
58. Section G.6.iii of the Wireless Code already requires service providers to clearly explain to customers at the time the customer is offered a device upgrade of any changes to existing contract terms, including any extension to the commitment period. Similarly, section D.4.i. of the Internet Code requires service providers to clearly disclose to customers the impact of changes to existing contracts at the time of the offer. The Commission already recognizes that the appropriate time for such explanations is when the service provider is offering a specific option (i.e. device upgrade). This should not be required to be disclosed in a 90-day notice.
59. This proposal is highly impractical. When a service provider issues a 90-day notice to a customer on a fixed-term contract the service provider does not know at that time what new offering a customer might choose or when they might choose it. If they wait until the end of the commitment period before changing plans, there are no changes to the existing contract terms. If they switch during the commitment period, the impact on existing contract terms depends on what offering they choose. Service providers cannot explain the consequences of changing plans or devices until the customer indicates their interest in a specific offering. It is at that time that the service provider can explain the implications of switching plans before the end of the commitment period and other options that may be available to them.

60. Requiring a service provider to determine and list all the possible options and repercussions in the 90-day notice without knowing the customer's intention is impractical and would be complex and costly. It would also add to the already lengthy list of information that must be included in the 90-day notice. The more information included, the less effective the notice is likely to be, as customers may feel overwhelmed and disengage from the process.
61. If the Commission intends to extend the requirement to explain changes to existing contract terms when accepting a new plan before the end of the commitment period, the requirement should not be part of the 90-day notice. It should be treated the same way that changes to existing contract terms are explained when accepting an offer of a new device.

CTA Amendments to Appendix 2:

"The Commission is seeking comments from interested persons on the proposed amendment indicated in bold text to sections G.6.(ii) of the Wireless Code and G.5.(ii) of the Internet Code:

- (ii.) A service provider must notify a customer on a fixed-term contract at least 90 calendar days before the end of their initial commitment period, whether or not the contract will be automatically extended. This notification must include
- a. the date on which the contract is set to expire;
 - b. a statement informing the customer that as of that date, they can switch plans, change services providers, or cancel their service without penalty; and
 - c. information explaining
 - i. whether the contract will be automatically extended with the same rates, terms, and conditions, on a month-to-month basis;
 - ii. if the contract is not being automatically extended, the proposed new minimum monthly charge for service going forward;
 - iii. **where the customer can find information about the service provider's current plans.**
 - iv. ~~what other current in-market plans are offered that best align with the current level of service offered;~~
 - v. ~~with respect to those plans,~~
- (a) all-in price, broken down into one-time fees and monthly fees including taxes;**

- ~~(b) the services included in the contract, such as voice, text, and data services, where applicable, and any limits on the use of those services;~~
- ~~(c) equipment/device fees;~~
- ~~(d) network coverage [Wireless Code only]; and~~
- ~~(e) network or service speed.~~

[see explanation for above changes in our response to Appendix 1, Questions 1 & 2]

- ~~vi. if the customer does not wish to remain with their current provider, that they can ask their new service provider to initiate a change of service provider;~~ [Note: see explanation for above change in our response to Appendix 1, Question 4]
 - vii. **where customers can find information about the what self-service mechanisms are available to assist the customer with cancelling or changing their plan take advantage of any of the above options;** [Note: see explanation for above change in our response to Appendix 1, Question 3]
 - ~~viii. any changes to the existing contract terms caused by accepting a new device or a new plan, including any extension to the commitment period.~~ [Note: see explanation in the immediately preceding paragraphs for this deletion]
- d. ~~if the customer agreed to a device rental plan;~~
- ~~i. a reminder that the device needs to be given back to the provider; or~~
 - ~~ii. the amount the customer originally agreed to pay to keep the device after the initial commitment period should they decide not to give it back.~~
- [Note: see explanation for changes in our response to Appendix 1, Question 5]

The Commission is also seeking comments from interested persons on the proposed amendment indicated in bold text to the end of section D (Changes to contracts and related documents) of the Wireless Code and Internet Code to add a notification requirement before the end of a time-limited discount or promotion:

Changes to a key contract term due to the expiration of a time-limited discount or promotion

- ~~• If the customer agreed to a time-limited discount or promotion that will expire before the end of the commitment period, a service provider must~~

~~provide the account holder with a notice reminding the customer (a) that their time-limited discount or promotion will expire on the set date and (b) what their new minimum monthly fee will be as of that date at least 30 calendar days before the end of the time-limited discount or promotion:~~

[Note: see explanation for this change in our response to Appendix 1, Question 12]

The Commission is also seeking comments from interested persons on the proposed amendment indicated in bold text to section E.1. of the Wireless Code:

1. International roaming notification

(i) When a device is roaming in another country, a service provider must notify the account holder, and the device user, at no charge. The notification must clearly explain the associated rates for voice, text messaging, and data services **and make the customer aware that if there are may be packages available to avoid pay-as-you-go costs/pricing.** **[Note: see explanation for this change in our response to Appendix 1, Q11]**

(ii) The account holder or device user may opt out of receiving these notifications at any time.

~~(iii) A service provider must notify a customer at least once when the customer reaches 75% of their international roaming usage limit, and again when they reach 90% of their limit, within a single monthly billing cycle.”~~

[Note: see explanation for this change in our response to Appendix 1, Question 10]