

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

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

**REPLY COMMENTS**

**OF**

**CANADIAN TELECOMMUNICATIONS ASSOCIATION**

**March 26, 2025**

## Executive Summary

1. In keeping with the policy objectives under the Act and the 2023 Policy Direction to the Commission, the Commission must consider how an intensely competitive market is already fulfilling the objectives of subsection 27.02 of the *Telecommunications Act* (the Act) before imposing new regulations that would create administrative and financial burdens on service providers that are disproportionate to any alleged incremental consumer benefits.
2. The evidence shows that the existing processes for informing customers about their service provider's latest offerings and customers' end-of-contract options are working well and that consumers are easily finding service plans that meet their needs, whether with their existing service provider or by switching to a new provider.
3. While some of the Commission's proposals are supported by consumer advocacy groups, these groups typically overlook that most of the information they say is desired by customers is already provided to them by service providers through various effective means. Requiring service providers to develop new systems and processes to include additional information in the 90-day notice or to create new notifications containing information that is already provided to customers is neither efficient nor effective regulation. These requirements are also not proportionate to their intended purpose.
4. To the extent that the Commission does mandate additional information be included in the 90-day notice or that additional notifications be issued by service providers it should ensure that such information or notifications can be implemented in a way that does not require the creation of notices that need additional customization for each individual subscriber. Customizing notices is a complex and costly process. Requiring services provides to incur such costs when there are more efficient and equally or more effective alternatives available cannot be justified.
5. As the Canadian Telecommunications Association (CTA) and its members propose in their respective initial comments, the most effective and efficient way to comply with the requirement in section 27.02 of the Act is to include information in the 90-day notice about where customers can find information about the service provider's current plans. Not only would this approach be the most effective and efficient way to

comply with the requirement in section 27.02 of the Act, but it would also address some of the concerns that consumer advocacy groups have with the Commission's proposal to include a recommended plan in the 90-day notice.

6. The most effective and efficient way to fulfill the subsection 27.02(3) of the Act requirement to include information about self-service mechanisms is by including in the 90-day notice a statement advising customers that such mechanisms exist and where they can find them. This approach is not only supported by service providers, but also by consumer groups such as the Public Interest Advocacy Centre (PIAC) and Option consommateurs.
7. Service providers should not be required to state 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. Additionally, the Commission's own annual survey shows that most subscribers already regard switching as easy and there is no evidence suggesting that such a statement is necessary or would make switching any easier.
8. While some intervenors support the Commission's proposal to include information about the subscriber's device rental or financing plan in the 90-day notice, they fail to acknowledge that this information is already provided to customers through other means. If the 90-day notice becomes a duplication of information that service providers already provide to customers it will become too lengthy, confusing and ineffective.
9. While we do not agree that the 90-day notice should include information about the terms of device rental or financing agreements, if the Commission imposes such a requirement, the most effective and efficient way to remind customers of such terms is to remind customers 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 a balance and other information that is already provided to customers through other means.
10. Many of our concerns with the Commission's proposals for adding additional information to the 90-day notice also apply to the proposal to require notices be sent to customers on month-to-month plans. Consumers on month-to-month plans are already aware that they can switch plans. 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 any evidence. To the contrary, statistics show that millions of subscribers are easily switching providers and/or plans each year without the need for such a notice.

11. If a notice to customers on month-to-month contracts is mandated, it should be a simple notice that does not require customization for each subscriber and should be sent no more than once every 24 months from the time the customer purchased or last modified their plan.
12. Intervenors who support the Commission's proposal to notify customers before they reach the \$100 international roaming cap have provided no evidence that there is a need for additional notifications. In contrast, the Commission's own public opinion survey shows that few subscribers find it difficult to manage roaming charges. Even fewer report experiencing bill shock attributable to international travel. The Commission should not require service providers to waste finite resources on developing new notifications in connection with roaming where there is no evidence supporting the need for such notification.
13. Most intervenors that endorse the Commission's proposal for requiring an additional notice to customers about the end of discounts or promotions fail to recognize that such information is already provided to customers in a variety of ways. Requiring an additional notice be sent to customers would be redundant. As required by the policy objectives in the Act, the Commission should not regulate where market forces are already ensuring that customers are notified of the end of time-limited discounts or promotions.
14. Proposals made by intervenors to further add to the 90-day notice or create additional obligations on service providers fail to recognize that the information referenced in their proposals is already readily available to customers. Further lengthening or adding complexity to the 90-day notice or requiring additional notices is neither effective nor efficient and such measures would not be proportionate to the purpose.

## **Introduction**

15. 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 reply comments in this proceeding.
16. As stated in our initial comments, we agree with the Commission and other intervenors 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.
17. Where we disagree with the Commission and intervenors who support and/or have suggested an expansion of the Commission’s proposals is how to efficiently and effectively provide customers with meaningful and accurate information that will assist them in choosing their next service plan.
18. In accordance the Commission’s revised procedure we may provide comments as part of our submissions in other proceedings that are also relevant to this Consultation. Failure to address an assertion or proposal that is contrary to our position should not be construed as our agreement with such assertions or proposal. To the extent that any comment in this reply conflicts with a comment of a CTA member, the comment of the member shall prevail with respect to that member.

## **Existing Processes are Working – Making Switching Plans Easy and Delivering High Customer Satisfaction**

19. As the CTA and its members explained in their respective initial comments, service providers provide customers with information about their latest offerings 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. They also provide information and notices about the customer’s current contract through email, SMS messages, on monthly invoices, and

in account portals and apps. Pursuant to the Wireless Code<sup>1</sup> and Internet Code<sup>2</sup>, service providers 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.

20. The evidence shows that these existing processes are working well and that consumers are easily finding service plans that meet their needs, whether with their existing service provider or by switching to a new provider. For example, as mentioned in our initial comments, in a 2024 survey of 5,000 Canadians conducted by Abacus Data,<sup>3</sup> 86% of respondents that switched wireless plans in the previous twelve months said they switched to a plan, either with their 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. Clearly, existing processes for informing consumers about current offerings are working and Canadians are benefiting from an intensely competitive market which is delivering lower prices, greater value, and significant investment in expanding and enhancing Canada's world class telecommunications networks.<sup>4</sup>
21. Despite this evidence, some intervenors argue that the number of Canadians switching plans is low and that switching is difficult. The Competition Bureau, referencing the Abacus study in its initial comments, implies that one in four respondents switching their wireless plan and/or provider in the last twelve months is somehow an indication that the market is not serving consumers well.<sup>5</sup> Additionally, the Bureau cites 2023 Commission data indicating that "just" 1.2% of wireless phone or home internet subscribers changed provider on average each month.<sup>6</sup> Rather than

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

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

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

<sup>4</sup> For example, see Bell, initial comments, February 14, 2025, sections 3.3 and 3.4.

<sup>5</sup> Competition Bureau, initial comments, February 14, 2025, paragraph 26.

<sup>6</sup> Ibid.

proving that a low number of Canadians are switching providers and/or plans or that switching is difficult, these numbers indicate the opposite.

22. With approximately 37 million mobile phone subscribers in Canada, one in four subscribers switching their plan and/or provider within a twelve-month period equals approximately 9.25 million subscribers switching. The Abacus study also indicated that of those who did not switch plans and/or providers in the preceding twelve months, 1 in 5 expected to do so in the following twelve months. This represents another approximately 5.55 million subscribers switching.
23. Similarly, the “just” 1.2% of wireless phone or home internet subscribers who changed their service provider on average each month in 2023 represents a significant number of subscribers switching providers. Applying the 1.2% monthly churn rate to the approximately 13.7 million internet access subscribers in 2023 suggests that nearly two million households switched internet access providers in 2023.
24. As Bell indicates in its initial comments, the number of wireless subscribers changing between service providers has been steadily increasing since 2020:<sup>7</sup>

**Table 1**

<b>Wireless Port Volumes</b>				
<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>
3,371,445	3,802,033 (+12.8% YoY)	3,901,065 (+2.6% YoY)	5,746,096 (+47.3% YoY)	6,203,474 (+8% YoY)

25. These wireless and internet service port volumes do not include the additional millions of subscribers who changed plans with their existing provider over the same period.
26. Despite the high volume of wireless and internet access subscribers switching plans or providers, the Competition Bureau cites statistics from the Commissioner for Complaints for Telecom-television Services (CCTS) as evidence of barriers to switching plans and/or providers. In particular, the Bureau cites the higher number of

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<sup>7</sup> Bell, initial comments, February 14, 2025, paragraph 15.

overall complaints as well as an increase in complaints regarding “termination fee issues”, “issues with being unable to cancel”, and “issues where customers could not transfer their service”.<sup>8</sup>

27. As TELUS notes in its initial comments,<sup>9</sup> using CCTS complaint statistics as a measure of customer service performance can be misleading. The same can be said of using CCTS complaint statistics as a measure of barriers to switching.
28. The increase in the number of complaints is in large part due to CCTS’s efforts to raise public awareness about its services and changes to CCTS’s complaints process. According to the CCTS, its public awareness efforts led to a 60% increase in visits to its website.<sup>10</sup> In other words, a rise in complaints filed with CCTS does not indicate a decline in customer service or an increase in difficulty in switching; rather it shows that more people are aware of CCTS’s services. This is a positive development. Our members aim to ensure every interaction with the millions of Canadian telecom subscribers are positive and that any issues are resolved satisfactorily, including those that go through the CCTS process.
29. More importantly, as mentioned by TELUS, while CCTS reports on the number of complaints it “accepts” it does not indicate the number of complaints that are meritorious.<sup>11</sup> Additionally, the descriptions of the type of complaints referenced in paragraph 26 do not specify whether they relate to barriers to switching. Simply put, there is simply not enough information provided.
30. If a customer contacts CCTS, CCTS first notifies the service provider to see if the provider can resolve the matter without CCTS having to investigate further. Encouragingly, CCTS reports that 88% of complaints were resolved by the customer and service provider without CCTS having to investigate.<sup>12</sup> This includes complaints that were unfounded or where the service provider went beyond its policies and contract terms to ensure a positive outcome for the customer. It is also important to note that, despite the increase, the number of complaints remains low, with less than

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<sup>8</sup> Competition Bureau, initial comments, February 14, 2025, paragraph 28.

<sup>9</sup> TELUS, initial comments, February 14, 2025, paragraph 15.

<sup>10</sup> [CCTS Annual Report](#), January 2025, page 95.

<sup>11</sup> Ibid.

<sup>12</sup> [CCTS Annual Report](#), January 2025.

0.08% of high-speed broadband and 0.05% of mobile phone subscribers raising issues.<sup>13</sup>

31. Where CCTS did investigate a complaint, it found that incidents of non-compliance by service providers of the Wireless Code were down for the fourth year in a row, and none of our members had more than a single Internet Code violation across the entire 2023-24 reporting year.<sup>14</sup>
32. Contrary to the Competition Bureau's assertions, the above referenced Abacus data and porting numbers show that a large number of wireless and wireline subscribers are switching plans and/or providers. Subscriber churn is at an all-time high<sup>15</sup> and millions of subscribers are changing plans with their existing provider. This would not happen if the existing processes for providing customers with information about current offerings were ineffective.
33. Likewise, large numbers of subscribers switching providers and/or plans would not occur if the process were difficult. The numbers support this, and subscribers themselves confirm that switching is easy. As cited in Bell's initial comments, the Commission's latest public opinion research on the consumer codes found that most Canadians (8 in10) found switching their wireless provider easy, with over half describing the process as extremely easy.<sup>16</sup>
34. Regarding those who have not yet switched, a recent survey conducted by RBC Capital Markets (RBCM) referenced in Bell's initial comments provides insight into one of the main reasons. In its December 18, 2024, equity research report<sup>17</sup>, RBCM showed a high level of consumer satisfaction with average rankings of 6-7 out of 10 for satisfaction with internet and wireless service providers. Additionally, 88% of wireless subscribers and 82% of internet service subscribers who were unlikely to switch providers cited satisfaction with their current provider as the reason.

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<sup>13</sup> The percentage of complaints as a percentage of subscribers is actually lower as the CCTS does not report the number of wireline and wireless complaints, only the number of wireline and wireless issues. As a complaint can include more than one issue, the number of wireline and wireless complaints would be lower than the number of issues reported.

<sup>14</sup> [CCTS Annual Report](#), January 2025.

<sup>15</sup> [Canadian Telecom Brief: Diverging Strategies Could Make or Break Leverage in 2025](#), S&P Global, January 14, 2025.

<sup>16</sup> [Public Opinion Research on the CRTC's Consumer Protection Codes 2024 – Final Report](#), CRTC, page 32.

<sup>17</sup> RBC Capital Markets, *Canadian Telecommunications Services*, 18 December 2024

35. It is in this context of record numbers of customers switching providers and/or plans, most subscribers describing switching as easy or extremely easy, and high overall customer satisfaction that the Commission's proposals must be considered.

### **Measures must be efficient and proportionate to their purpose**

36. As discussed in our initial comments, the main difference between what is required under the Wireless and Internet Codes and what is required under the new subsection 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.”
37. According to the policy objectives set out in the *Telecommunications Act*, market forces should be increasingly relied upon, and if regulation is required, it should be “efficient and effective.”<sup>18</sup> The 2023 policy direction to the Commission (2023 Policy Direction) also provides that the Commission should “ensure that measures that it imposes through its decisions are efficient and proportionate to their purpose.”<sup>19</sup>
38. In keeping with the policy objectives under the Act and the 2023 Policy Direction, the Commission must consider how an intensely competitive market is already fulfilling the objectives of subsection 27.02 of the Act before imposing new regulations that would create administrative and financial burdens on service providers that are disproportionate to any incremental consumer benefits. This is especially the case where, as discussed above, existing processes used by service providers to inform consumers about their latest offerings and their current contracts have facilitated millions of subscribers easily switching providers and/or plans every year.
39. While the initial interventions show that many of the Commission's proposals are supported by consumer advocacy groups, these groups often overlook that most of the information they say is desired by consumers is already provided by service providers to their customers through various effective means. Requiring service

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<sup>18</sup> *Telecommunications Act*, s7(b)

<sup>19</sup> [Order Issuing a Direction to the CRTC on a Renewed Approach to Telecommunications Policy](#), paragraph 4.

providers to develop new systems and processes to include information in the 90-day notice or to create new notifications for information that is already provided to customers and readily available for them to review is neither efficient nor effective regulation. These requirements are also not proportionate to their intended purpose.

40. To the extent that the Commission does mandate additional information be included in the 90-day notice or that additional notifications be issued by service providers it should ensure that such information or notifications can be implemented in a way that does not require the creation of notices that need additional customization for each individual subscriber. Customizing notices is a complex and costly process. Requiring services providers to incur such costs when there are more efficient and equally or more effective alternatives available cannot be justified.

**Commission’s proposal to include information on a plan that best aligns with current service level (Questions 1 & 2)**

41. To address the requirements of section 27.02 of the Act, the Commission proposes that service providers include information about their current in-market plans that best align with the customer’s current level of service in the 90-day notice delivered to customers on fixed term contracts. As we discuss in our initial comments, including information about the plan that “best aligns” 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.
42. Rather than making it easier for a customer to choose their next plan, it could create a barrier by failing to provide customers with a full understanding of available offerings. Additionally, plan information sent 90 days before the end of a contract may become outdated by the end of term and/or more suitable plans may become available after the 90-day notice is sent, causing confusion and dissatisfaction among customers.
43. As CTA and its members propose in their respective initial comments, the most effective and efficient way to comply with the requirement in section 27.02 of the Act is to include information in the 90-day notice about where customers can find information about the service provider’s current plans. Not only would this approach be the most effective and efficient way to comply with the requirement in section

27.02 of the Act, but it would also address some of the concerns that consumer advocacy groups have with the Commission's proposal to identify a specific plan or plans in the 90-day notice.

44. For instance, the Manitoba Coalition indicated that 94% of respondents to a survey it commissioned stated that they would like a list of "all" available plans from their current provider.<sup>20</sup> The Coalition acknowledges that it is impractical to include such a list in the 90-day notice and that "a balance needs to be struck between the volume of information provided in the 90-day notice and the accessibility of that information."<sup>21</sup> Our proposal to include information in the 90-day notice about where the customer can find information about their service provider's current plans would address the desire of those 94% of respondents who want information about all available plans while overcoming the impracticality of including all that information in the 90-day notice.
45. The DHH Coalition indicated that customers would be in a "better position when deciding to downgrade, stick with or upgrade their current plans" if notification could "somehow inform customers of ...plans at a lower price point with less features and...plans at a higher price point with more features."<sup>22</sup> Implicit in this statement is that receiving only information about plans that align with current service levels may not be in the customer's best interest. Customers need more information to make an informed decision, just as service providers often need more information from customers to best inform them on what plans will meet a customer's needs. However, the Coalition's proposal does not accomplish this goal.
46. As the Abacus survey referenced above shows, many consumers who upgrade their service plans find plans that cost less than their current plan and offer more features or attributes. Only providing information about a plan that costs less with less features would mislead customers about the range of options available to them. Our proposal would address these shortcomings by ensuring that customers are notified of where to find information about all current offerings from their service provider.
47. The Canada Deaf Grassroots Movement (CDGM) also acknowledges that listing a plan that best aligns with the customer's current service level does not serve the customer's best interest. The CDGM states that "[r]estricting options in this way

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<sup>20</sup> Manitoba Coalition, initial comments, February 14, 2025, Appendix A, page 3.

<sup>21</sup> Ibid.

<sup>22</sup> DHH Coalition, initial comments, February 14, 2025, paragraph 11.

could prevent customers from accessing better, more cost-effective, or more inclusive services.”<sup>23</sup> CDGM’s proposed solution, to require the inclusion of more information in the 90-day notice, including “lower cost alternatives” and “higher-tier plans” is impractical for many of the same reasons as the Commission’s proposal. CDGM’s concern with ensuring the DDIHHDB’s customers have “access to a variety of plans – including those with unlimited text messaging, video call support, or improved data packages...”<sup>24</sup> can most effectively and efficiently be addressed by adopting our proposal to include information in the 90-day notice on where to find information about current offerings from their service provider.

48. The Union des consommateurs and the Competition Bureau, in expressing opposition to the Commission’s proposal to include information about other service plans in the 90-day notice, state that they are concerned that a service provider could use this opportunity to promote a service plan that is the more expensive than the customer’s current plan or that exceeds their needs.<sup>25</sup> Again, our proposal addresses this concern by not recommending a specific plan to the customer. Instead, it simply provides the customer with information on where to find the service provider’s current plans.
49. Finally, the CCTS acknowledges that the effectiveness of the 90-day notice will decline if it contains too much information and it “urge[s] the Commission to balance the amount of information provided in the 90-day notice to ensure that it remains effective to improve decision-making.”<sup>26</sup>
50. As many of the consumer advocacy group intervenors argue, not only must the Commission avoid adding too much information to the 90-day notice, but it must also avoid adding information that is incomplete and that could mislead customers as to the options available to them. We agree.
51. As the Abacus survey shows, customers do not need a recommendation of a specific plan in the 90-day notice to find plans that suit their current needs and that provide more value for their dollar. As CTA and its members propose in their respective interventions, the most effective and efficient way to comply with the requirement in

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<sup>23</sup> CDGM initial comments, February 14, 2025, paragraph 9.

<sup>24</sup> Ibid, paragraph 10.

<sup>25</sup> Union des consommateurs initial comments, February 14, 2025, paragraph 9. Competition Bureau, initial comments, February 14, 2025, paragraph 44.

<sup>26</sup> CCTS, initial comments, February 14, 2025, paragraph 8.

section 27.02 of the Act is to include information in the 90-day notice about where customers can find information about the service provider's current plans.

### **Information about self-serve mechanisms (Question 3)**

52. In our initial comments we stated that the subsection 27.02(3) of the Act requirement to include information about self-service mechanisms can most effectively and efficiently 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.
53. Some consumer groups, such as the Deaf Wireless Consultative Committee (DWCC), argue that the 90-day notice should include “detailed information”<sup>27</sup> on self-service mechanisms, while others such as the PIAC and Option consommateurs indicate that informing customers of the existence of self-service mechanisms and inclusion of a link to the self-service mechanisms would be sufficient.<sup>28</sup>
54. Providing detailed information in the 90-day notice is unnecessary and does not provide for the most effective and efficient way to implement the requirement of subsection 27.02(3) of the Act. The 90-day notice already includes a lot of information and including details of the kind recommended by intervenors such as the DWCC will result in the 90-day notice growing to an unmanageable length for consumers, overwhelming them with information and reducing the effectiveness of the notice. We agree with consumer groups such as PIAC and Option consommateurs that simply informing customers via the 90-day notice of the existence of the self-service mechanisms and where they can find them is sufficient.

### **Information about cancelling existing service and transferring phone number (Question 4)**

55. Customers are aware of the ability to have their new service provider cancel their existing service and transfer their phone number. As mentioned by Rogers in its initial comments, this process has been in place since 1997 for wireline services and since 2007 for wireless services.<sup>29</sup> Service providers have every incentive to advise prospective new customers of their ability to facilitate transfers and they do. As a result, and as referenced above, millions of such transactions occur every year.

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<sup>27</sup> DWCC, initial comments, February 14, 2025, paragraph 15.

<sup>28</sup> PIAC, initial comments, February 14, 2025, paragraph 20. Option consommateurs, initial comments, paragraph 10.

<sup>29</sup> Rogers, initial comments, February 14, 2025, paragraph 30.

56. CCTS statistics referenced by some intervenors, such as PIAC, do not support the argument that Canadians face wide-spread issues or lack of knowledge regarding the porting of services. As discussed above, CCTS reports only on the number and type of complaints, not whether the complaints are meritorious, and it does not provide insights into consumers understanding of the porting process. Instead, the Commission's latest annual survey shows that most Canadians (8 in10) found switching their wireless provider to be easy, with just over half saying the process was extremely easy.<sup>30</sup> Adding yet more excessive and unnecessary information into the 90-day notice will make the notice even longer and risk confusing customers and reducing its effectiveness.
57. More importantly, 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.

#### **Information about device rental plans (Question 5)**

58. As mentioned in our initial comments, requiring the 90-day notice to include this additional information would make the notice longer, harder to comprehend, and likely 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.
59. While some intervenors support the Commission's proposal to include such information in the 90-day notice, they fail to acknowledge that this information is already provided to customers through other means. If the 90-day notice becomes a duplication of information that service providers already provide to customers it will become too lengthy, confusing and ineffective.
60. While we do not agree that the 90-day notice should include information about the terms of device financing agreements, if the Commission imposes such a requirement, the most effective and efficient way to remind customers of such terms

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<sup>30</sup> [Public Opinion Research on the CRTC's Consumer Protection Codes 2024 – Final Report](#), CRTC, page 32.

is to inform customers 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 a balance and other information that is already provided to customers through other means.

**Notices for customers on month-to-month plans (Questions 7 & 8)**

61. As mentioned in our initial comments, our concerns regarding the proposed additional requirements for the 90-day notice sent to customers on fixed-term contracts, such as notifying customers of in-market plans that “align” with their current service level, apply equally to a requirement to provide such information to customers on 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.
62. As we discuss above, statistics show that millions of Canadians switch provider and/or plans every year without a requirement for service providers to provide such a notice. This is largely attributable to the intense competition in the telecom market which includes extensive advertising and direct marketing by service providers as they seek to retain current customers and attract new ones. 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.
63. If a notice to customers on month-to-month contracts is mandated, it should be a simple notice that does not require customization for each subscriber. Customizing notices for each subscriber is complex and costly. Imposing such administrative and financial burdens on service providers does not align with the direction of ensuring that any measures taken by the Commission are effective and proportionate.
64. If a notice is mandated, the frequency of the notice should be no more than once per twenty-four months from the date when the customer purchased or modified their plan. This is the same time frame in which customers on fixed-term contracts receive the 90-day notice. The Competition Bureau indicates in its intervention that a notice every two years would be reasonable.<sup>31</sup>

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<sup>31</sup> Competition Bureau, initial comments, February 14, 2025, paragraph 53.

65. Proposals made by intervenors for more frequent notices, such as PIAC's suggestion<sup>32</sup> that a notice be sent ten calendar days before the end of each month in the month-to-month agreement cycle should be rejected. Such proposals are unreasonable and would impose an unwarranted administrative and financial burden on service providers. Many consumers are already overwhelmed by the number of communications they receive from businesses. Increasing the frequency of communication will likely result in consumers tuning out and disengaging.

### **International Roaming Data Cap Notifications (Question 10)**

66. Intervenors who support the Commission's proposal to notify customers before they reach the \$100 international roaming cap have provided no evidence that there is a need for additional notifications. In contrast, the latest public opinion research commissioned by the Commission shows there are "[r]elatively few (15%) subscribers who find it difficult ...to manage roaming charges."<sup>33</sup> Even fewer report experiencing bill shock attributable to international travel.
67. 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 2025.<sup>34</sup>
68. The Commission should not require service providers to waste finite resources on developing new notifications in connection with roaming where there is no evidence supporting the need for such notification.

### **Notification before the end of a time-limited discount or promotion (Question 12)**

69. As indicated in their initial comments, service providers inform customers of the end of discounts or promotion through a variety of means. For instance, Bell includes such information in the critical information summary included within the customer contract, in the customer's online account and in the customer's monthly bill.<sup>35</sup> Rogers use multiple means to notify customers, including banner information on

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<sup>32</sup> PIAC, initial comments, February 14, 2025, paragraph 29.

<sup>33</sup> [Public Opinion Research on the CRTC's Consumer Protection Codes 2024 – Final Report](#).

<sup>34</sup> [Wireless carriers tell CRTC they're already offering flexible roaming options](#), Bloomberg, November 11, 2024.

<sup>35</sup> Bell, initial comments, February 14, 2025, paragraph 84.

customers' online accounts, email notices three months prior to the expiration date, and bill notifications.<sup>36</sup>

70. Requiring an additional notice be sent to customers would be redundant. As required by the policy objectives in the Act, the Commission should not regulate where market forces are already ensuring that customers are notified of the end of time-limited discounts or promotions.

### **Other Proposals**

71. Some intervenors have made proposals that go beyond those suggested by the Commission regarding the information to be included in the 90-day notice or other notifications.
72. CCTS and PIAC have suggested that notices include information about historical usage to assist customers in choosing a plan that meets their needs.<sup>37</sup> In doing so they fail to acknowledge that service providers already make this information available to customers through various means, including on monthly billing statements and in customer account portals and apps. Requiring service providers to include this redundant information in the 90-day notice or other notifications would require the development of costly and complex systems and processes to customize each customer notification. Such a requirement would not be effective and efficient regulation and would not be proportionate to its purpose.
73. CCTS also proposes that the 90-day notice inform customers on fixed-term contracts of the terms under which the service provider is allowed to increase prices or make changes to services if the contract is being extended on a month-to-month basis.<sup>38</sup> CCTS suggests that this would assist the customer in deciding whether to extend the contract on a month-to-month basis or enter a fixed-term contract to achieve cost certainty.
74. Such a requirement is unnecessary. First, pursuant to the Wireless and Internet Codes, the customer's existing contract already includes the terms governing changes to the contract, including price changes. Secondly, the customer is not always facing a price change at the time the commitment period expires. A potential

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<sup>36</sup> Rogers, initial comments, February 14, 2025, paragraph 54.

<sup>37</sup> CCTS, initial comments, February 14, 2025, paragraph 29. PIAC, initial comments, February 14, 2025, paragraph 15.

<sup>38</sup> CCTS, initial comments, February 14, 2025, paragraph 35.

price change is speculative and what a customer is more likely considering is whether they are satisfied with their current service and service plan, or whether they want to explore other options.

75. As CCTS acknowledges, the Wireless and Internet Codes provide various advance notice requirements before a service provider can make a change to a service contract, including price changes. In the scenario described by the CCTS, if an internet service customer on a month-to-month contract receives a notice of price increase, the increase does not take effect immediately. The customer has sixty days in which to decide whether to continue under the existing contract or cancel their contract and switch to a new plan, either with their existing provider or a new provider. It is the requirement to provide advance notice that protects the customer's interests, not the CCTS's proposed reminder that a contract change could occur sometime in the future.
76. In its intervention the Competition Bureau suggests that the 90-day notice should use a standardized label format to present information about the customer's existing service plan. The Bureau refers to the Commission's separate proceeding, CRTC 2024-318, as a consultation on "how to implement a 'broadband consumer label'" and suggests that mandating such format in the 90-day notice would be an efficient and minimize compliance costs.
77. TNC CRTC 2024-318 is not a proceeding on "how to" implement a broadband consumer label. It is a consultation on how to implement the requirements of Bill C-288 regarding the advertising of fixed broadband speeds and to consider other issues raised in the consultation. One proposal put forward by the Commission for consideration is the adoption of a consumer broadband label. For reasons we have provided in our initial comments to TNC CRTC 2024-318, we strongly oppose any requirement to use a standardized label for the advertising of fixed broadband speeds or any other service quality or performance metrics.
78. Rather than minimize compliance costs, the Bureau's proposal to require a standard label format for the 90-day notice would vastly increase compliance costs and require service providers to develop complex and costly systems and processes, the costs of which are vastly disproportionate to any potential consumer benefit.
79. The Competition Bureau further recommends that notices should be formatted and delivered so that consumers can easily access, understand and act upon them, and

that notices should be simple and relevant.<sup>39</sup> While we do not agree that the Commission should impose a standard format for the presentation of required information, we agree with the Bureau that notices should be accessible, easy to understand, simple and relevant. The best way to accomplish this is to ensure that notices do not contain excessive and redundant information and do not require customization for each subscriber.

80. The DHH Coalition and DWCC recommend that notices should include pre-recorded ASL and LSQ videos. With respect, such a proposal is impractical. This is especially the case to the extent that the Commission requires a notice to include information that is specific to each individual subscriber.
81. Finally, we note that OpenMedia's intervention does not address the questions posed by this Consultation but instead proposes that a standard consumer label be adopted for presenting information about mobile plans and to mandate machine-readable formats. This clearly falls outside of the scope of this Consultation. We will address the Commission's consumer label proposal in the TNC CRTC 2024-318 proceeding.

**\*\*\*End of Document\*\*\***

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<sup>39</sup> Competition Bureau, initial comments, February 14, 2025, paragraph 60.