

**TELECOM NOTICE OF CONSULTATION
CRTC 2024-295**

*Making it easier to choose a wireless phone or Internet service –
Enhancing self-service mechanisms*

REPLY COMMENTS

OF

CANADIAN TELECOMMUNICATIONS ASSOCIATION

March 26, 2025

Executive Summary

1. The Commission must determine what constitutes a self-service mechanism and the type of mechanisms that are acceptable under subsection 27.01 of the *Telecommunications Act* (the Act). Subsection 27.01 provides the Commission with broad discretion when deciding what is meant by “self service” and any requirements related thereto.
2. The record of this proceeding demonstrates that existing contract modification and cancellation processes are efficient and easy to use and according to the Commission’s own admission, self-service mechanisms are not something that has been raised by consumers during the Commission’s consumer research.
3. Service providers, without any regulatory mandates, are proactively expanding the range of tools available to customers for interacting with them, reviewing service information, and managing their accounts. However, as acknowledged in the initial comments of several consumer advocates, self-service mechanisms also expose customers to significant risks. Therefore, service providers have been careful to take a balanced approach in introducing self-service tools by including appropriate safeguards that protect customers from unintended consequences.
4. The Commission should take a similarly balanced approach in determining what constitutes a self-service mechanism and the types of self-service mechanisms that are acceptable under subsection 27.01 of the Act. Specifically, the Commission should affirm that a self-service mechanism that includes consumer safeguards, such as requiring interaction with a customer service representative before completing a request, is an acceptable type of self-service mechanism under subsection 27.01 of the Act.
5. Additionally, the Commission should not impose any requirements regarding other customer service channels. Each service provider has its own business model and varies in size, financial resources, and customer demographics. For instance, all-digital brands aim to attract a specific demographic that is comfortable with using digital tools. Forcing service providers to provide alternative forms of costly customer service channels will divert resources

away from improving their existing customer service offerings and reduce their ability to differentiate themselves from their competition.

Introduction

6. Pursuant to the procedure outlined in Telecom Notice of Consultation 2024-295 - Call for Comments – Making it easier to choose a wireless phone or Internet service – Enhancing self-service mechanisms (Consultation), the Canadian Telecommunications Association provides its reply comments in this proceeding.
7. Failure to address an assertion or proposal that is contrary to our position should not be construed as our agreement with such assertions or proposals. In accordance with the Commission’s revised procedure, comments made by CTA in other proceedings may also be applicable to this proceeding. To the extent that our comments conflict with a comment of a CTA member, the comment of the member shall prevail with respect to that member.
8. In this proceeding the Commission must determine what constitutes a self-service mechanism and the type of mechanisms that are acceptable under subsection 27.01 of the *Telecommunications Act* (the Act). Subsection 27.01 provides the Commission with broad discretion when deciding what is meant by “self service” and any requirements related thereto.
9. The record of this proceeding demonstrates that existing contract modification and cancellation processes are efficient and easy to use and according to the Commission’s own admission, self-service mechanisms are not something that has been raised by consumers during the Commission’s consumer research.
10. Service providers, without any regulatory mandates, are proactively expanding the range of tools available to customers for interacting with them, reviewing service information, and managing their accounts. However, as acknowledged in the initial comments of several consumer advocates, self-service mechanisms also expose customers to significant risks. Therefore, service providers have been careful to take a balanced approach in introducing self-service tools by including appropriate safeguards that protect customers from unintended consequences.

11. The Commission should take a similarly balanced approach in determining what constitutes a self-service mechanism and the types of self-service mechanisms that are acceptable under subsection 27.01 of the Act. Specifically, the Commission should affirm that a self-service mechanism that includes consumer safeguards, such as requiring interaction with a customer service representative before completing a request, is an acceptable type of self-service mechanism under subsection 27.01 of the Act.

Existing processes for modification and cancellation are working well

12. As demonstrated in our initial comments,¹ aided by existing Commission policies which allow a subscriber's new service provider to cancel service on the subscriber's behalf and number portability which enables subscribers to keep their telephone number when changing service provider, service providers' existing processes make it easy for subscribers to modify and cancel service plans. Existing processes also ensure that subscribers are fully informed of their options, the implications of cancelling or modifying a contract or plan, and options that might better address their needs.
13. The Commission for Complaints for Telecom-Television Services (CCTS) indicates that it has observed an increase in customers reporting issues when trying to cancel their wireless and Internet contracts and that this "may suggest"² an increase in challenges when cancelling or switching. CCTS can only speculate because it very rarely investigates the underlying reasons for a complaint or establishes whether a complaint has merit.³ 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.
14. Encouragingly, CCTS reports that 88% of complaints were resolved by the customer and service provider without CCTS having to investigate.⁴ 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

¹ CTA, initial comments, March 12, 2025, paragraphs 15-22.

² CCTS, initial comments, March 12, 2025, paragraph 3.

³ Ibid. paragraph 12.

⁴ [CCTS Annual Report](#), January 2025.

0.08% of high-speed broadband and 0.05% of mobile phone subscribers raising issues with their service.⁵ Additionally, as TbayTel observes, complaints about cancelling or switching services and cancelling fees only accounts for 4% of the total complaint volume.⁶

15. CCTS further states that the reported cancellation issues relate to a provider refusing to cancel a service, a system issue preventing the cancellation, and where there were issues porting a service.⁷ There is no evidence to suggest any of these issues would have been avoided with a mandated self-service mechanism. A service provider is entitled to refuse a cancellation request if the request to cancel does not conform to the terms of the service contract. Subsection 27.01(1) does not change this fact. While the system and porting issues are not explained, the purpose of subsection 27.01 of the Act is not to address such issues. For these reasons, the Commission should not regard the CCTS data as evidence that modifying or cancelling a service is difficult.
16. Public Interest Advocacy Centre (PIAC) cites the CCTS data as evidence that there is a “titanic-sized” customer service problem which justifies mandating full self-service mechanisms.⁸ However, PIAC’s grand claim, like the Titanic, sinks under scrutiny.
17. The evidence shows that millions of wireless and Internet access subscribers are switching providers or plans each year.⁹ Subscriber churn is at an all-time high.¹⁰ This would not happen if the existing processes for modifying or cancelling services were ineffective or difficult. The numbers support this, and subscribers themselves confirm that switching is easy. The Commission’s consumer research found that most Canadians (8 in 10) find switching their

⁵ 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.

⁶ Tbaytel initial comments, paragraph 6

⁷ Ibid. paragraph 14.

⁸ We use the term “full self-service” to describe a mechanism that does not require interaction with a customer service representative.

⁹ CTA, initial comments. March 12, 2025, paragraphs 15-22.

¹⁰ [Canadian Telecom Brief: Diverging Strategies Could Make or Break Leverage in 2025](#), S&P Global, January 14, 2025.

wireless provider easy, with over half describing the process as extremely easy.¹¹

18. Given the convincing evidence that existing processes for contract modification and cancellation are efficient and easy to use for most subscribers, the Commission should proceed cautiously when exercising its discretion under subsection 27.01 of the Act. Overly prescriptive requirements that disrupt and divert finite resources away from existing processes, including existing self-service mechanisms, risks exposing customers to unintended consequences, decrease in customer satisfaction, and increase subscriber monthly bills. In exercising its discretion under subsection 27.01 the Commission should adopt an approach that balances convenience with the need to provide adequate safeguards and flexibility.

The risks of a full self-service mandate

19. As noted in their responses to the Commission's request for information letter dated July 23, 2024 (RFI) and their interventions in this proceeding, service providers are continually expanding the range of tools available to customers. This includes self-service and on-line tools which allow customers to review service information, manage different aspects of their accounts, find answers to technical and service-related questions, and interactive with customer service representatives.
20. However, while self-service tools offer convenience, interventions by consumer advocates acknowledge that service-tools do not appeal to all consumers and are not without risk. In reference to self-service mechanisms generally, and not specifically telecom-related, the Canada Deaf Grassroots Movement (CDGM) notes that DDIHHDB individuals are often reluctant to use self-service mechanisms because they do not accommodate their specific needs.¹² The Manitoba Coalition notes that "...inviting consumers to make purchases in the absence of customer service representatives creates risks of uninformed or unsupported decision making."¹³ CCTS states that while self-service

¹¹ *Ibid*

¹² CDGM, initial comments, March 12, 2025, paragraph 4.

¹³ Manitoba Coalition, initial comments, Paragraph 17

functionality “may be helpful”¹⁴ customer complaints rise when consumers are surprised that their expectations do not match their actual experiences.¹⁵

21. These risks must not be overlooked. As mentioned in our initial comments, cancelling or modifying a service or plan is not always straightforward and is not always compatible with a simple “on off” switch. For example, service bundles are convenient and offer customer savings, but many customers do not want to cancel or modify all their bundles services or lose the benefits of special packages and promotions. Customers may also not understand other options available to address the reason they are seeking a change to their plan, such as putting their account on pause or options for persons experiencing financial hardship.
22. Some intervenors suggest that these risks can be managed if the Commission requires service providers to build the most comprehensive full self-service mechanisms. Option consommateurs argues that self-service mechanisms “must offer maximum functionality”.¹⁶ PIAC states that self-service mechanisms must be “all-encompassing and complete for the goal they are meant to achieve”.¹⁷ CCTS says that to overcome the risks inherent in self-service mechanisms, self-service mechanisms must anticipate all of the implications of the customer’s modification or cancellation request and explain such implications before the customer can complete the transaction.¹⁸
23. These intervenors want the Commission to require service providers to build self-service mechanisms that contemplate every scenario and eliminate any risk of unintended consequences, but without a requirement to interact with a customer service representative to complete a transaction. Such a mandate would be complex and costly to implement, and highly impractical. As Bell explains in its initial comments in this proceeding:

Mandating a self-service system capable of handling every customer interaction is impractical due to the wide range and complexity of

¹⁴ *Ibid*

¹⁵ CCTS initial comments, paragraph 17

¹⁶ Option consommateurs, initial comments, March 12, 2025, paragraph 4.

¹⁷ PIAC, initial comments, March 12, 2025, paragraph 8.

¹⁸ CCTS, initial comments, March 12, 2025, paragraph 4.

customer needs, and the substantial IT costs involved for service providers would far outweigh any associated customer benefits.¹⁹

24. Nevertheless, PIAC argues that self-service mechanisms must be full self-service because many consumers do not like dealing with service representatives and what it refers to as the increasing consumer demand for self-service tools. To support its position, it cites several articles that discuss customers in general – not specifically telecom customers – use of self-service mechanisms.²⁰
25. However, PIAC fails to mention that the self-service mechanisms discussed in these articles consist of online knowledge databases and FAQs that can be searched before reaching out to customer service, and chatbots, social media, texting and email to engage with customer service representatives. One of the cited articles emphasizes the importance of ensuring a seamless transition from self-service tools to interactions with customer service representatives. Online knowledge databases, FAQs, chatbots and other messaging applications are widely used in Canada’s telecom industry. Service providers are already meeting the consumer demand outlined in these articles.
26. Additionally, with one exception, the articles make no mention of using full self-service tools to cancel or modify a service or subscription. The only mention of cancellation is a reference to a survey respondent who reached out to a business online to initiate a request to cancel a subscription. This is not an example of eliminating the need to interact with a customer service representative. Furthermore, the Commission has acknowledged that its own consumer research has not revealed that self-service mechanism for modifying or canceling services are something that consumers have been asking for:

“...I will note a self-service mechanism is something new, quite intriguing, not heard of as a suggestion prior to the bill coming into

¹⁹ Bell initial comments, March 12, 2025, paragraph 26.

²⁰ PIAC, initial comments, March 12, 2025, paragraphs 9 to 13.

place. We will be looking at that, but it was not something that consumers raised with us in our research...”²¹

27. Intervenors who want the Commission to mandate costly and complex full self-service mechanisms that duplicate in virtually every way the function of a live customer service representative also want the Commission to require service providers to offer parallel customer service channels, such as in-store, online and phone customer service representatives for people who do not want to use or cannot use self-service mechanisms. For example, the Manitoba Coalition states that “it cannot be assumed that such mechanisms will be accessible or preferred by all” and that “the currently-available options of telephone and in-person customer service must be maintained to ensure that all consumers are adequately service”.²² They also want the Commission to prohibit service providers from charging fees for facilitating any of these transactions.
28. Considering the evidence of this proceeding, a full self-service mechanism mandate is unreasonable, unnecessary, and impractical. Supporters of a full self-service mechanism are requesting the Commission to mandate the implementation of costly and complex self-service mechanisms, even though existing processes for modifying and cancelling services are working well, most Canadians consider switching to be easy, and the Commission has not seen a demand for this type of self-service mechanism.
29. They also want the Commission to force service providers to maintain or provide in-store, online, and phone customer services, without allowing service providers, if they so choose, to charge fees to recover the associated costs of maintaining these parallel channels. This proposal calls for an unnecessary and costly overhaul of existing practices that are functioning effectively, while imposing a significant financial burden on service providers. If these additional costs cannot be recovered from one-time service fees, then service providers will have to consider cutting back on investments in infrastructure and service improvements or recovering these costs through an increase in the monthly service fees charged to all subscribers.

²¹ Scott Hutton, Chief, Consumer, Research and Communications, CRTC testimony, [Senate Standing Committee on Transport and Communication](#), May 28 2024

²² The Manitoba Coalition, initial comments, March 12, 2025, page 5. See also PIAC, initial comments, March 12, 2025, paragraphs 18 and 25; Option consommateurs, initial comments, March 12, 2025, paragraph 13; Union des consommateurs, initial comments, March 12, 2025, paragraph 13.

A full self-service mandate is contrary to the policy objectives of the Act and the 2023 Policy Direction

30. Parliament provided the Commission with broad discretion in determining what constitutes a self-service mechanism pursuant to subsection 27.04(1) of the Act and what type of self-service mechanisms are acceptable. In exercising its discretion, the Commission is required to ensure that its decision advances the policy objectives set out in section 7 of the Act and the 2023 Policy Direction.²³
31. In the Consultation, the Commission states that this proceeding addresses the policy objectives set out in paragraphs 7(a) and 7(h) of the Act. However, mandating full self-service mechanisms does not facilitate the orderly development of a telecommunications system that serves to safeguard, enrich and strengthen the social and economic fabric of Canada and its regions. Instead, it would divert resources from expanding and enhancing telecommunications services, especially in underserved communities, to building and maintaining self-service mechanisms that the evidence shows are unnecessary, risk creating customer confusion and unintended consequences, and for which there is little demand. For the same reasons, such a mandate would not be responsive to the economic and social requirements of users, rather it would likely increase consumer prices and disproportionately affect subscribers who use these options less frequently.
32. Mandating full self-service mechanisms would also fail to advance the policy of objectives of paragraphs 7(c)²⁴, 7(f)²⁵ and 7(g)²⁶ of the Act. Overly prescriptive self-service mechanisms would reduce service providers ability to differentiate themselves and would reduce the competitive impact of service providers who offer all-digital brands without a regulatory mandate to do so. Forcing all service providers and their sub-brands to also make other customer service channels available would

²³ [Order Issuing a Direction to the CRTC on a Renewed Approach to Telecommunications Policy](#) (2023 Policy Direction)

²⁴ To enhance the efficiency and competitiveness, at the national and international levels, of Canadian telecommunications.

²⁵ To foster increased reliance on market forces for the provision of telecommunications services and to ensure that regulation, where required, is efficient and effective

²⁶ To stimulate research and development in Canada in the field of telecommunications and to encourage innovation in the provision of telecommunications services.

impose additional financial burdens and further harm service providers ability to differentiate their services and offer lower prices.

33. Such a mandate would fail to increase reliance on market forces which, as evidenced in this proceeding, has made switching easy, enables millions of subscribers to change plans or providers every year, and has resulted in the introduction of a variety on online and self-service customer service mechanisms. Mandating a full self-service mechanism would also discourage rather than encourage innovation in the provision of telecommunications services as service providers would be forced to develop the same self-service tools, resulting in less incentive and resources to invest in other innovative solutions.
34. Mandating full self-service mechanisms would also contradict the expectations set out in the 2023 Policy Direction, which require the Commission to balance a wide range of policy considerations in arriving at its decisions.²⁷ The Commission is also expected to ensure that measures it imposes are efficient and proportionate to their purpose²⁸, and that decisions are based on sound and recent evidence²⁹. As mentioned above, the evidence in this proceeding clearly shows that existing processes for modifying and cancelling services are working and that most Canadians consider switching to be easy. Mandating the creation of costly and complex full self-service mechanisms would not be an efficient use of resources and would not be proportionate to the purpose.

A balanced approach to self-service

35. Service providers are already investing heavily in self-help tools and are continually expanding the options for consumers to interact with service providers, review information regarding their services, and manage their accounts.
36. But in doing so, service providers are also careful to take a balanced approach that protects consumers from unintended consequences. They do so by including in some self-service mechanisms a requirement for the customer to interact with a customer service representative to ensure that the customer

²⁷ 2023 Policy Direction, section 2.

²⁸ Ibid. section 4.

²⁹ Ibid. section 6.

understands the implications of the changes they wish to make, including what amounts they will owe or what promotion or services they will lose. Interaction between a customer and service representative also gives the representative the opportunity to understand why the changes are being requested and resolve any issues the customer may have (which is an objective of both the Commission and the CCTS) or find options that fit the customer's needs.

37. Service providers must also make decisions on how best to allocate their finite resources when developing customer support services. These decisions are based on factors like brand identity, customer expectations, and intention to differentiate from the competition. In this way, market forces and intense competition in Canada's telecom market is already driving customer service innovation without the need for a regulatory mandate. This also allows service providers to properly balance operational efficiency and customer experience.
38. As existing processes for modifying and cancelling services are working well, the Commission should adopt a similar balanced approach and should avoid taking an overly prescriptive approach. The Commission should allow service providers flexibility in how they communicate with their customers to provide them the necessary information surrounding the potential consequences of cancellation or modification, to understand the reasons for the request, and inform customers about options that might better address their needs.
39. A flexible and balanced approach ensures that customers can perform many tasks independently while recognizing that certain processes might still require human interaction to ensure the customer understands the implications of the request and is aware of other options that might better suit the customer's needs. Therefore, the Commission should establish as the minimum criteria for self-service mechanisms that they allow a customer to initiate a request to modify or cancel a service or contract. Additionally, the Commission should conclude that self-serve mechanisms that require customers to interact with a customer service representative before completing a transaction are acceptable types of self-service mechanisms under subsection 27.01 of the Act.
40. The Commission should not impose any requirements regarding other customer service channels. Each service provider has its own business model and varies in size, financial resources, and customer demographics. For

instance, all-digital brands aim to attract a specific demographic that is comfortable with using digital tools. Forcing them to provide alternative forms of costly customer service channels will divert resources away from improving their digital platforms and reduce their ability to differentiate themselves from their competition.

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