

**TELECOM NOTICE OF CONSULTATION
CRTC 2024-318**

***Making it easier for consumers
to shop for Internet services***

**FINAL COMMENTS
OF
CANADIAN TELECOMMUNICATIONS ASSOCIATION**

September 5, 2025

Executive Summary

1. While the main purpose of this submission is to address certain responses to the Commission's July 3, 2025, request for information (RFI), we also reiterate the positions advanced in our earlier filings.
2. The record of this proceeding demonstrates that Canadian consumers already receive the information they need to make informed choices through existing ISP practices and the disclosure requirements of the Internet Code. The Commission's own research confirms that most Canadians find it easy to locate and compare information when shopping for internet services. There is no evidence of systemic confusion or harm that would justify introducing a standardized broadband label or the mandated disclosure of product or performance metrics other than typical broadband speeds during peak periods as required pursuant to Bill C-288. International experience reinforces this conclusion: the FCC's broadband label has failed to meaningfully engage U.S. consumers, while the U.K. and Australia have declined to pursue such an approach.
3. Our review of RFI responses underscores the unnecessary complexity and costs that a broadband label mandate and other proposed obligations would create. Proposals such as requiring ASL/LSQ videos for every internet plan, mandating the advertising of minimum guaranteed speeds, imposing QR codes in advertising, or developing iconographic representations of internet usage all suffer from the same flaws: they are impractical, duplicative, or misaligned with actual consumer needs.
4. Similarly, suggestions to make the Critical Information Summary (CIS) "more" persistently available highlight that consumers already have access to this document, meaning additional requirements would serve little purpose while placing a significant financial and administrative burden on ISPs. Suggestions regarding how the Commission should manage the overlap between a proposed broadband label and the CIS miss the most obvious and evidence-based solution for avoiding confusion, which is to acknowledge that a broadband label is not needed, as existing ISP practices and Internet Code

requirements already ensure that consumers are provided with the information most relevant to their decision making process.

5. A broadband label mandate, as well as the proposals that fall outside the narrow and specific requirements of Bill C-288, would impose significant costs, administrative burdens, and operational complexity on ISPs while offering little, if any, incremental benefit to consumers. It would duplicate existing disclosures, risk confusing consumers with multiple overlapping documents, and divert resources away from investments in coverage, speed, and resiliency. Such an outcome would be inconsistent with the 2023 Policy Direction, which requires regulation to be efficient, proportionate, and evidence based.
6. Respectfully, the Commission should resist the temptation to replicate or “improve” upon a model that has already proven ineffective elsewhere. Instead, it should recognize that existing measures are working and that the objectives of Bill C-288 and the 2023 Policy Direction can be met by following the recommendations we set out in our initial intervention. Pragmatic, evidence-based regulation, not prescriptive, duplicative, and cost-ineffective requirements, remains the best way to protect consumers while fostering continued investment and innovation in Canada’s broadband networks.

Introduction

7. Pursuant to the procedure outlined in Telecom Notice of Consultation 2024-318-4 - Call for Comments – Making it easier to shop for Internet (Consultation), the Canadian Telecommunications Association (CTA) appreciates the opportunity to provide its final comments in this proceeding. Failure to address an assertion or proposal made by others should not be construed as our agreement with such assertions or proposal. 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. Although the main purpose of this final submission is to address responses provided to the Commission’s July 3, 2025, request for information (RFI), we also wish to iterate the positions advanced in our initial intervention (February 20, 2025) and reply comments (March 26, 2025).

9. As stated in our earlier submissions, we recognize that the proposals put forward by the Commission in this proceeding, including the concept of a consumer broadband label, are well-intended, reflecting a desire to ensure that Canadians have clear, accurate and comparable information when shopping for internet services. However, as a famous economist once said, “one of the great mistakes is to judge policies and programs by their intentions rather than their results.”¹ The key question therefore must be whether the proposed measures will deliver results that are an improvement over what exists today and that justify the costs and complexity that such measures will impose.
10. On this point the evidence is clear. Consumers already receive the information they need to make informed choices because of the transparent practices of ISPs, which include compliance with the extensive disclosure requirements of the Internet Code. The Commission’s own research demonstrates that Canadians are aware of, and able to compare, broadband offerings.² There is no evidence of systemic confusion or harm that would justify a consumer broadband labeling mandate or the mandated disclosure of service metrics that are not relevant to most Canadians.
11. International and comparative experience reinforces this conclusion. In the United States, the only country where broadband labels have been mandated, Cogeco reports that engagement by its customers with such labels is minimal. Other jurisdictions, such as the U.K. and Australia, have chosen not to pursue standardized broadband labels, preferring more flexible, outcome-focused measures that are focused specifically on broadband speeds.
12. By mandating a standardized broadband label or the disclosure of performance metrics beyond broadband speeds, the Commission would impose high compliance costs, administrative burdens, and operational complexity on ISPs that far outweigh any potential incremental benefits to consumers. Such a

¹ Milton Friedman, December 1975, interview on PBS’s “The Open Mind”.

² According to the Commission’s own Transparency Report, 87% of Canadians reported no difficulty finding or understanding information when shopping for internet services. Among the 13% who did, the issues cited were diffuse, with only 2% referencing speeds and just 1% indicating difficulty comparing services, providers, or price, suggesting no consistent or systemic problem warranting regulatory intervention. - “Public opinion research to enhance the transparency of information provided to broadband consumers: final report prepared for the Canadian Radio-Television and Telecommunications Commission (CRTC),” *Earnscliffe Strategy*, 12 April 2024, https://publications.gc.ca/collections/collection_2024/crtc/BC92-133-2024-eng.pdf, page 35.

mandate is clearly contrary to the 2023 Policy Direction which requires the Commission to “ensure that the measures that it imposes through its decisions are efficient and proportionate to their purpose”³ and to “base its decisions on sound and recent evidence and should exercise its powers to obtain necessary evidence.”⁴ The unnecessary complexity and costs of a broadband label mandate would also undermine the policy objective of ensuring reliable, affordable, high-quality services for all Canadians⁵, as ISPs have estimated compliance would cost tens of millions of dollars, diverting resources away from network investment and ultimately driving up consumer prices.

13. Mark Goldberg, a leading telecom policy expert with decades of experience and recognized for his independent, evidence-based analysis of complex telecom issues, reached the same conclusion in a recent Telecom Trends article, where he wrote the following:

The Canadian broadband landscape, while not perfect, is delivering results. Consumers are better informed than ever. Providers have every incentive to communicate clearly in a competitive marketplace where switching is relatively easy, and transparency is expected. Rather than enhancing transparency, a mandatory label risks becoming a costly distraction from the issues that matter most to consumers.

Complying with a prescriptive labelling mandate requires service providers to invest time, money, and ongoing IT system changes. These are finite resources that could be — and should be — spent on things that matter more to consumers: expanding rural coverage, boosting network speeds, and improved resiliency.

Instead, if the CRTC imposes a standard label requirement, we’re likely to see a label very few Canadians will read, developed through a lengthy regulatory process that has only a self-congratulatory press release issued by the CRTC to show for it. For the average consumer, the impact will be negligible. Meanwhile, the opportunity cost will be very real.

This isn’t to say the CRTC shouldn’t care about consumer transparency. It absolutely should. But it needs to pick its tools carefully. When the existing approach is working, when international evidence points the failure of labeling mandates, and when the

³ Order Issuing a Direction to the CRTC on a Renewed Approach to Telecommunications Policy (SOR/2023-23), <https://laws.justice.gc.ca/eng/regulations/SOR-2023-23/>, section 4. (2023 Policy Direction)

⁴ Ibid, section 6.

⁵ Telecommunications Act, paragraph 7(b).

cost of action outweighs the benefit, regulators should resist the urge to do something for the sake of doing something.

Canada's telecommunications future depends not just on investment and innovation, but on smart, focused regulation. This is a moment for the CRTC to embrace pragmatism over performative policy. It should resist the temptation to fix that which isn't broken — and acknowledge that sometimes doing nothing is the best option.⁶

Addressing responses to the Commission RFI

14. In the remainder of these final comments, we address certain responses submitted by other parties to Appendix 1 of the RFI in order to clarify the record and demonstrate that the evidence does not support additional regulatory intervention.

Question 1: Peak Periods

15. In Question 1, the Commission asks whether 7pm to 11pm (local time) would constitute an adequate and simple definition for the residential (consumer) period and, if not, where whether there is a cost-effective way to produce localized peak period-related measurements.
16. Most respondents indicated that a 7pm-11pm (local time) window constituted an adequate and simple definition. While some respondents indicated that there could be circumstances or events where the actual peak period falls outside this window, they did not offer cost-effective ways to produce alternative peak period measurements. As indicated in the responses by ISPs to this question, measuring actual periods at the local level would be cost-prohibitive.

Question 3: Right amount of information to be provided to consumers

17. In our response to question 3, we stated that only prices (with our noted caveats) and the information mandated by Bill C-288, namely typical download and upload speeds during peak period, are relevant to most consumers. ISPs know from their extensive interactions with consumers that the most relevant

⁶ [Rethinking Broadband Labels](#), July 24, 2025.

information to consumers is price and speed. Other information is either mandated for disclosure in other ways, or less relevant and does not require mandatory disclosure.

18. We also raised concerns with certain information types identified in the Commission's list, as their meaning is unclear and they have not been meaningfully examined in this proceeding. The RFI responses confirm that these deficiencies persist. Accordingly, the Commission should not place weight on items where ambiguity or confusion remains, as doing so would risk adopting requirements that are neither workable nor evidence based. These include the following:

ASL/LSQ Videos

19. Several intervenors listed "A link to American Sign Language (ASL)/ Langue des signes québécoise (LSQ) videos" in the "Most Relevant" column. As we explained in our response to this question, it is unclear what videos the Commission is referring to, what their content would be, who would be responsible for producing them, or where they would be hosted. It is inappropriate to assess a potential linking requirement in the absence of a proper consultation regarding these questions.
20. In paragraph 5 of its response to the RFI, The Canada Deaf Grassroots Movement stated that: "If ISPs are preparing a new plan or updating an existing one, they must simultaneously prepare: (a) ASL and LSQ videos explaining the plan and key terms." This would appear to require the production of a separate ASL and LSQ video for each internet plan of every ISP.
21. It would be wholly impractical to require ISPs to produce ASL and LSQ videos for every internet service plan because of the sheer number and constant turnover of those plans. ISPs offer dozens of packages that differ by speed tier, bundled services, promotional pricing, or limited time offers. Because of intense competition within the industry, these plans are frequently revised, discontinued, or replaced in response to market forces.
22. Requiring that each plan be accompanied by a professionally produced ASL and LSQ video would impose a significant and costly ongoing production burden. Videos would need to be updated or re-shot every time a plan changes,

leading to high costs, administrative complexity, and inevitable delays. Many of the videos would quickly become outdated or irrelevant as plans cycle out of the market. In short, the volume and volatility of internet service plans makes this kind of requirement administratively unworkable and inefficient.

23. Given both the uncertainty surrounding the Commission's reference to ASL/LSQ videos and the impracticality of the proposals advanced by some intervenors, it would be inappropriate for the Commission to impose any requirement in this area without first clarifying its intent, providing context, and conducting a proper separate consultation.

Minimum Guaranteed Broadband Speeds

24. Several intervenors identified minimum guaranteed speeds as "Most Relevant." However, as we explained in our RFI response, the concept of a "guarantee" carries specific legal and commercial implications that have not been examined in this proceeding. Introducing such an obligation without proper consultation would risk creating serious legal uncertainty and exposing ISPs to financial liabilities that were never contemplated or addressed in this proceeding.
25. Moreover, for the reasons outlined in our RFI response, we do not think that a minimum speed guarantee for residential (consumer) services is necessary or appropriate. The Commission should therefore refrain from imposing any requirement in this area unless and until it conducts a separate, dedicated proceeding in which the implications can be fully assessed and tested on the record.

QR Code for other information

26. While some intervenors listed a QR code as being "most relevant," there has been little, if any, explanation of what the code would link to, how it would be used, or why it would provide value to consumers.
27. In practice, it is our understanding that most internet access service advertising occurs digitally, whether through product webpages or other forms of digital marketing, which allows consumers to navigate to other information and other

webpages with a click. A QR code adds no value in that context, since the consumer is already online and able to access any relevant information directly.

28. Even in the context of print advertising, mandating a QR code makes little sense. The purpose of a QR code is to bridge offline media with online content, yet for internet services the product itself is inherently digital, and consumers already know the next step is to go online to learn more. A mandated QR code would not offer any measurable improvement in transparency. Rather it would impose unnecessary costs and introduce technical and design constraints into advertising materials without demonstrable benefit to consumers.

Question 4: Iconographic representations

29. While icons may appear appealing as an easy, visual shortcut for consumers, in reality they oversimplify highly variable and individualized service needs and therefore cannot provide an accurate or reliable basis for choosing an internet plan. What looks like a simple solution risks becoming a misleading one.
30. This is not only our position, but also the position of others such as Catherine Middleton who questions the effectiveness of icons. In her RFI response, Ms. Middleton cites research that indicates that icons alone are ineffective, and that developing effective icons is challenging and time-consuming.⁷
31. The fact that no intervenor was able to identify an existing standard set of icons that effectively represents internet use cases underscores the impracticality of this approach. If such icons were genuinely capable of conveying the complexity of internet service suitability, they would already exist and be in common use. Their absence is strong evidence that icons are not a suitable or reliable tool for this purpose.
32. The most effective way for consumers to ensure they are choosing the right service is to discuss their unique needs directly with a sales representative or customer service agent. These professionals can consider household size, device mix, applications, and budget in ways that no generic symbol could capture.

⁷ Catherine Middleton, response to RFI, question 4, pp 2-3.

33. Should the Commission, notwithstanding that such a mandate would be ill-advised, choose to require the display of icons, we reiterate our submission in response to the RFI that the CTA is not the appropriate body to develop or oversee the creation and maintenance of a standardized set of icons.

Question 5: Critical information summary (CIS)

34. As indicated in our response to question 5, the idea that ISPs should make the Critical Information Summary (CIS) “more persistently and readily available” was, to the best of our knowledge, not something raised by an intervenor but rather by Commissioner Abramson. As the question implies, and as the Internet Code requires, customers are already provided with a copy of the CIS when they enter into a service agreement and therefore is already readily available to the customer. Moreover, the Commission’s public opinion research reveals that few respondents ever refer to their agreement once they have one.⁸ Therefore, it is unclear what problem this proposal seeks to address.
35. As the RFI responses from ISPs indicate, requiring ISPs to make the CIS persistently available through consumer portals or other mechanisms would entail significant costs and operational burdens. Customers can already retrieve the CIS they were given at the time of contracting, for example, by checking their email inbox or requesting another copy from their ISP. Imposing additional requirements to achieve the same outcome would be wholly unjustified.
36. Question 5 also asks how to manage the complexity of having a broadband label and a CIS. This is precisely the kind of unnecessary complexity and duplication that the broadband label proposal has created. Consumers would be confronted with multiple overlapping documents, containing similar information in slightly different formats, with the likely effect of confusing rather than assisting them. At the same time, ISPs would face further compliance burdens, administrative costs, and system changes to manage duplicative requirements.

⁸ Public Opinion Research to Enhance the Transparency of Information Provided to Broadband Consumers Final Report, April 12, 2024, p. 47.

37. Rather than creating and then attempting to manage these duplications, the more effective solution is to recognize that a broadband label is not needed at all. The existing practices of ISPs, including compliance with the Internet Code, already ensure transparency, and the evidence demonstrates that consumers are not suffering from systemic confusion or lack of transparency. The broadband label proposal has only introduced unnecessary questions and regulatory complexity. The Commission should acknowledge this reality and avoid mandating a solution in search of a problem.

Question 8: Improving on the Federal Communications Commission (FCC) labels

38. Question 8 itself reveals the problem with the broadband label proposal. If a regulatory measure were truly effective, there would be no need to ask how to “make it more useful” or how to “improve adoption.” The fact that the Commission is grappling with this question demonstrates that it too recognizes the weakness of the broadband label concept. Cogeco’s evidence of minimal engagement by its U.S. customers with broadband labels is a clear signal that the policy has failed to engage the very audience it was designed to serve.
39. Intervenors who support the concept of broadband labels are similarly grappling with this problem, as few suggestions were provided in the RFI responses as to how an FCC-type label could be more useful than is the case in the U.S.
40. PIAC was one of the few intervenors who offered a suggested improvement, but its idea for increasing visibility of a label overlooks the central issue: Canadian ISPs already provide customers with the information that is most important to them when shopping for internet services. This fact, supported by the Commission’s public opinion research, is consistently overlooked by proponents of broadband labels. The Commission is not faced with a choice between broadband labels or no disclosure of information to consumers. Consumers are already well-informed and there is no convincing evidence that a broadband label is a better way to inform consumers than ISPs current practices.
41. PIAC also argues that the Commission must take note that the Commission’s public opinion research revealed that most respondents thought a standardized

label would be helpful. As we highlighted in our earlier intervention, the question posed to respondents was designed in such a way that any other result was unlikely. For example, it asked the respondent to state whether the label would be helpful or harmful. Given those choices it is not surprising that more people chose the former. However, the question did not ask respondents to compare the sample label to existing disclosure practices, nor is it a measure of how many consumers would actually use a label. Importantly, other parts of the same opinion research showed that most Canadians did not find it hard to find the information they were looking for or have trouble comparing products or plans.

42. To proceed down the path of trying to “improve” upon the FCC’s broadband label regime, when there is no evidence that the U.S. approach has or will ever achieve its intended purpose, is not the proper course. Effective regulation must be grounded in demonstrated need and proven outcomes, not in copying or adjusting a model that has already shown itself to be ineffective. The record in this proceeding shows that Canadians are already well-served by existing disclosure obligations and competitive practices, and there is no indication that a standardized label would add meaningful value. Respectfully, the CRTC should avoid replicating or tinkering with a failed model.

Conclusion

43. The record in this proceeding makes clear that Canadian consumers already receive the information they need to make informed choices through the transparency requirements of the Internet Code and the established practices of service providers. International experience reinforces this point: the FCC’s broadband label has failed to engage U.S. consumers, and other jurisdictions have deliberately chosen not to pursue such an approach. Attempting to replicate or “improve” upon a model that has not achieved its intended purpose would risk layering unnecessary costs and complexity onto Canadian providers while providing little or no incremental benefit to consumers.
44. Effective regulation must be grounded in demonstrated need and proven outcomes. In this case, there is no evidence of systemic consumer confusion, no evidence that Canadians are disadvantaged under current disclosure rules, and no evidence that a standardized broadband label would deliver better results than existing practices. By

contrast, there is ample evidence that a label mandate would impose significant burdens on providers and run counter to the requirements of the 2023 Policy Direction for proportionate, efficient, and evidence-based regulation.

45. Respectfully, the Commission should resist the temptation to regulate for the sake of appearances. By adopting the proposals set out in our initial intervention, the Commission can fulfill the purpose of Bill C-288 and meet the objectives of the 2023 Policy Direction.

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