February 4, 2026

M. Simon Jolin-Barrette, MNA
Ministère de la Justice
Édifice Louis-Philippe-Pigeon
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By Email: sjb.BORD@assnat.qc.ca

Dear M. Simon Jolin-Barrette,

Subject: Bill 10: *An Act to protect consumers against abusive practices in ticket reselling and online subscription renewal*

1. Introduction

On behalf of the Canadian Telecommunications Association (the "Association" or "CTA"), we are writing to provide comments on Bill 10, *An Act to protect consumers against abusive practices in ticket reselling and online subscription renewal* ("Bill 10").

The Association represents telecommunications and television service providers ("communication service providers") that invest in, build, operate, and maintain Canada's communications networks. Our members provide critical services to millions of Canadians, including wireless, Home Phone, Internet, and television services ("communication services") that support everyday activities such as work, education, public safety, healthcare access, and participation in the digital economy. These communication services are provided on a recurring or sequential basis and are frequently bundled to deliver greater value and affordability to consumers.

We strongly support effective consumer protection and share the Government of Québec's objectives of transparency, fairness, and consumer confidence in subscription-based contracts. In this regard, the communications sector is both highly competitive and extensively regulated, and communication service providers already employ practices that align closely with these objectives. Existing industry processes are designed to ensure that consumers are fully informed at the time of purchase of the terms of their contract, including promotional pricing and when such pricing ends, and are made aware of upcoming promotion expiries. Existing practices are also designed to enable customers to easily switch providers or plans while ensuring they understand the implications of cancelling or modifying services, particularly where such changes may affect other services or impact pricing.

While well intentioned, we are concerned that certain provisions of Bill 10, if applied to communication services, could create inadvertent and harmful consequences for Québec consumers. Overly prescriptive cancellation and notification requirements risk accidental loss of communications services (for example access to 911), inadvertent cancellation of bundled services and loss of associated discounts or may prevent a consumer from keeping their current phone number when switching to a new provider. Overly prescriptive notification requirements could also reduce communication service providers' ability to offer promotional pricing in Québec, potentially leading to higher costs for consumers in the province.

2. Scope of Comments

Our comments are limited to proposed sections 187.28 and 187.29 of Bill 10 which are applicable to certain contracts involving sequential performance. For greater clarity, any absence of comment on other provisions of Bill 10 should not be construed as endorsement of the proposed approach.

3. Proposed Section 187.28 – Online Cancellation Mechanisms

Proposed section 187.28 would require merchants to provide a clearly identifiable online mechanism enabling consumers to cancel certain contracts without cause. While this approach may be appropriate for many subscriptions for digital services, its application to communication services raises significant concerns.

Telecommunications and television services differ fundamentally from typical online consumer subscriptions. They are not simple "on/off" services. A single, one-click cancellation mechanism risks triggering unintended and potentially harmful consequences for consumers. For example, consumers frequently subscribe to multiple services as part of a subscription bundle (such as wireless, Internet, and television services) because bundles offer cost savings, convenience, and simplified billing. Cancelling one service within a bundle may inadvertently impact other services, eliminate bundled discounts, or trigger immediate repayment obligations for financed devices or equipment return obligations. For example, a customer seeking to cancel their television service could unintentionally lose access to their home Internet as well. They could also lose discounts on their other services that were part of the bundled offer or trigger an equipment return obligation.

In addition, Canada's phone number portability framework is a cornerstone of competition and consumer choice in the wireless market. If a consumer wishes to switch to a new service provider but keep their existing phone number, the new communication service provider initiates the number transfer and cancels the existing service on the consumer's behalf, without the customer having to contact their old communication service provider. This process ensures continuity of service and allows consumers to retain their phone numbers. A unilateral one-click cancellation requirement is incompatible with this system and could result in service cancellation before a number is successfully ported, undermining both consumer choice and continuity of service.

Current industry practices are designed specifically to avoid these outcomes by ensuring that consumers are fully informed, understanding both their options and the implications of cancelling or modifying services. As part of these practices, live interactions with customer service representatives can, in certain cases, help the provider understand the customer's needs and, where appropriate, recommend a plan or option that better fits those needs. These practices promote clarity, informed decision-making, and service continuity, including uninterrupted access to emergency and public safety services, and are not compatible with a simplified cancellation mechanism designed for non-essential, standalone subscriptions.

3.1 Proposed Approach

The Association recommends amendments that would limit the application of section 187.28 to "digital services", like digital content and streaming apps, and exclude services provided by communication service providers. This approach would preserve the policy intent of Bill 10, protecting consumers from abusive practices, while recognizing the unique characteristics of essential communications services which are already subject to extensive oversight and supported by well-established industry practices that promote transparency and informed decision-making.

4. Proposed Section 187.29 – Notice of Price Increases Following Promotional Periods

Proposed section 187.29 would require merchants to provide advance written notice within 2-10 days when a free or discounted period ends and a higher price applies. Communication service providers already place a strong emphasis on pricing transparency and have well-established practices that ensure consumers are aware of the expiry of promotional pricing and any new prices.

Consumers are clearly informed, at the time of entering into a service agreement, of:

- the duration of promotional pricing;
- the regular price that will apply once a promotion ends; and
- any conditions or eligibility requirements associated with the promotion.

In addition, communication service providers remind customers of upcoming changes through disclosure on their monthly bills, and/or online customer portals or applications and advance written notice when required. Requiring an additional prescribed advance notice before every promotional price ends would require communication service providers to build or significantly modify complex IT and billing systems to track and deliver **individualized** notices across a wide range of plans, promotions, bundles, and billing cycles. These changes would be costly and operationally complex, particularly given the scale and diversity of promotional offerings in the communications services market.

Importantly, these costs would not deliver meaningful new transparency for consumers, as the relevant information is already disclosed clearly during the contracting process and reinforced through ongoing customer communications. Instead, the requirements in proposed section 187.29 risk creating duplicative notices that may contribute to consumer confusion rather than clarity.

Faced with increased complexity and cost, communication service providers may have to consider offering fewer promotional discounts, shortening promotional periods, or moving away from time-limited offers in Québec altogether. For consumers—particularly price-sensitive households—this could mean fewer discounted options, reduced flexibility, and higher prices. As a result, a measure intended to protect Québec consumers could inadvertently undermine affordability and consumer choice in the communication services market in the province.

4.1 Proposed Approach

The Association recommends amendments to proposed section 187.29 of Bill 10 and related amendments to section 214.1.1 of the *Consumer Protection Act*, CQLR c P-40.1 and section 79.6.9.1 of the *Regulations Respecting the Application of the Consumer Protection Act,* CQLR c P-40.1, r 3, that would remove the requirement for communication service providers to issue notices within 2-10 days before the end of a promotional period.

As outlined above, this requirement would impose a significant administrative burden on communication service providers, while being unlikely to deliver any meaningful benefits to consumers. Considering the effectiveness of current disclosure and notification practices in the communication services sector, duplicative notice obligations for critical communications services should be avoided.

5. Proposed Section 214.1.1—Advertising of Non-Periodic Fees

Section 214.1.1 concerning the disclosure of “fees charged other than on a periodic basis”, risks needlessly burdening the regulatory framework and creating interpretive redundancies. Taken together, sections 12, 54.4 and 214.2 (pre-contractual and contractual), as well as sections 219, 224 and 228 (advertising), already require: the detailed disclosure of all components of the price; the framework for non-periodic payments; and the clear indication of the total price when a price by periodic instalments is advertised. Accordingly, section 214.1.1 should be removed.

6. Conclusion

The Association reaffirms its strong support for effective consumer protection and the Government of Québec's policy objectives. However, applying a law of general application to services provided by communication service providers risks creating unintended and harmful consequences for Québec consumers.

We respectfully recommend that Bill 10 be amended to recognize the unique characteristics of communication services and avoid applying the sequential performance provisions where existing sector-specific consumer protection frameworks and practices already address these matters.

We would welcome the opportunity to discuss these comments further and to continue working collaboratively with the government to advance consumer protection in a clear, coherent, and effective manner.

Kind regards,

Eric Smith
Senior Vice President

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