

TELECOM AND BROADCASTING NOTICE OF CONSULTATION
CRTC 2025-274-2,
CALL FOR COMMENTS – IMPROVING CUSTOMER AWARENESS
OF THE COMMISSION FOR COMPLAINTS FOR TELECOM-
TELEVISION SERVICES INC. – REINSTATING THE PROCEEDING
WITH CHANGES TO PROCEDURE

PROPOSAL
OF
CANADIAN TELECOMMUNICATIONS ASSOCIATION

23 JULY 2026

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I. Introduction and Executive Summary

1. The Canadian Telecommunications Association (“CTA”) is an industry association dedicated to building a better future for Canadians through connectivity. Our members include telecommunication service providers, equipment manufacturers, and other organizations in the telecommunications ecosystem that invest in, build, maintain, and operate Canada’s world-class telecommunications and broadcasting networks.
2. Pursuant to the procedure set forth in Broadcasting and Telecom Notice of Consultation CRTC 2025-274-2¹ (“BTNC 2025-274-2”), CTA provides its proposal on how the notification requirement set out in the Consumer Protection Codes could be modified to improve awareness of the Commission for Complaints for Telecom-television Services Inc. (“CCTS”), and in particular how customers with unresolved complaints should be made aware of the CCTS.
3. CTA members are committed to resolving customer complaints efficiently and effectively. Customer satisfaction and retention are fundamental to their businesses, and service providers have a strong interest in resolving customer concerns directly wherever possible. The CCTS plays an important role as an independent dispute resolution body by providing consumers with an avenue of recourse when disputes cannot be resolved through a service provider’s internal complaint resolution process.
4. CTA respectfully disagrees with the Commission's preliminary view that the existing notification framework, where customers are informed about the CCTS at the second level of escalation, is failing to ensure that customers with unresolved complaints are informed about the CCTS. The evidentiary record does not demonstrate that the current framework is failing to achieve its intended purpose or that additional regulatory obligations on service providers are warranted.
5. The Commission's evidence shows only that some consumers may not later recall whether or how they learned about the CCTS.² It does not establish that consumers who may benefit from access to the CCTS are being denied that access because of shortcomings in the existing notification framework. In the absence of evidence

¹ Broadcasting and Telecom Notice of Consultation CRTC 2025-274-2, *Call for comments – Improving customer awareness of the Commission for Complaints for Telecom-television Services Inc. – Reinstating the proceeding with changes to procedure*, 23 April 2026, at para 9 [BTNC 2025-274-2].

² Nanos Research, [Understanding Consumer Awareness and Satisfaction with the Commission for Complaints for Telecom-television Services \(CCTS\)](#): Executive Summary (Prepared for the Canadian Radio-television and Telecommunications Commission (CRTC), April 2024) at page 4, para 5 [the Report].

demonstrating a problem, the Commission has not established a basis for fundamentally redesigning the customer complaint resolution process, which would be the effect of the preliminary view set out in BTNC 2025-274³

6. Even if the Commission concludes that changes to the existing framework should be considered, those changes should reflect the operational realities of customer complaint resolution. The Commission's proposal to notify customers earlier than at the second level of escalation about the CCTS — specifically at the point an "offered solution" is presented to a customer — would fundamentally alter frontline customer service by relocating formal complaint administration into ordinary service interactions. Introducing the concept of "offered solution" and associated process requirements would also expand the purpose of this consultation well beyond its stated objective of improving awareness of CCTS when customers have unresolved complaints. This approach would impose significant operational costs on service providers, reduce customer service efficiency, and contradict the requirement under the Order Issuing a Direction to the CRTC on a Renewed Approach to Telecommunications Policy ("2023 Policy Direction") that regulatory measures be efficient and proportionate to their purpose.⁴
7. Should the Commission nevertheless determine that additional measures are appropriate, CTA proposes targeted enhancements that build upon existing complaint resolution processes, rather than fundamentally redesigning them. The proposals would provide customers with timely written information about the CCTS once a complaint has progressed to formal escalation, improve the visibility of complaint resolution information on service providers' websites, and preserve the Commission's stated objective that service providers should have a reasonable opportunity to resolve complaints before the CCTS is engaged.⁵
8. This proposal was developed by CTA's service provider members and reflects their collective operational expertise.⁶ Representative examples illustrating the CTA proposal can be found on page 12 of these submissions. Members reviewed and considered multiple approaches, refining them through iterative discussion to reach consensus on a proposal that addresses the Commission's concerns, is practical and

³ BTNC 2025-274, at para 8.

⁴ [*Order Issuing a Direction to the CRTC on a Renewed Approach to Telecommunications Policy*](#), SOR/2023-23, at s 4 [2023 Policy Direction].

⁵ BTNC 2025-274-2 at para 6.

⁶ Participating members include Bell Canada, Bragg Communications Inc. (Eastlink), Cogeco, Québecor, Rogers Communications Inc., SaskTel, Tbaytel, Vidéotron and Xplore.

flexible for providers of multiple sizes to implement, and preserves the integrity of the existing CCTS complaint resolution process. Given the procedural timelines for BTNC 2025-274-2, each carrier required time to investigate their internal systems and assess the impact of the CRTC's proposal in order to develop a proposal that was both feasible and responsive to the CRTC's objectives. As a result, we were unable to consult more broadly with other interested stakeholders prior to the proposal deadline.

9. To the extent that any comment in this intervention conflicts with a comment of a CTA member, the comment of the member shall prevail with respect to that member.

II. The Commission's Preliminary View is not Supported by the Evidence and is Unworkable

a. The Evidentiary Record Does Not Support the Commission's Preliminary View

10. The Commission's preliminary view that Canadians with unresolved complaints are not being effectively made aware of the CCTS is founded principally on the results of its public opinion research and the consumer feedback reported in the CCTS' annual reports. While those sources may provide some insight into consumer perceptions and levels of awareness, they do not, on their own, provide a sufficient evidentiary basis to conclude that the existing notification framework is not functioning as intended or that additional regulatory obligations are warranted.
11. The central issue in this proceeding is whether consumers who have been unable to resolve their complaint through their service provider's internal complaint process are being made aware of the CCTS at the point in the complaint process when that information becomes relevant. However, the public opinion research does not directly measure that question. Rather, it measures respondents' retrospective self-reporting of events that may have occurred months before the survey was conducted. Those are fundamentally different inquiries.
12. This distinction is reflected throughout the survey findings. The research confirms that virtually all respondents who experienced a complaint first sought to resolve it with their service provider.⁷ That is entirely consistent with the design of the existing complaint resolution framework. The fact that respondents did not identify the CCTS as their first point of contact similarly reflects the intended operation of that

⁷ CCTS Mid-Year Report August 1, 2025 – January 31, 2026, page 4.

framework, under which consumers are required to pursue resolution with their service provider before engaging the CCTS.

13. The Commission also relies on a finding that 96% of respondents who contacted their service provider about a complaint (and whose provider did not resolve their complaint) reported that their service provider did not mention the CCTS as an avenue to address their complaint.⁸ However, this finding is based entirely on retrospective self-reporting, which required respondents to recall details of customer service interactions that may have occurred months earlier. Such evidence is inherently unreliable. It is susceptible to the recognized limitations of human memory, including memory decay, recall bias, and the tendency to focus on the substantive outcome of a complaint rather than procedural information that may have been provided during the interaction. Consequently, the survey measures what respondents remember, not necessarily whether notification occurred.
14. Moreover, this finding should be interpreted with caution, as the survey provides no context as to what respondents considered to be a "complaint." A respondent's subjective understanding of a complaint may differ significantly from how complaints are identified and managed within a service provider's customer service and complaint escalation processes. For example, a customer may contact their provider to inquire about a bill, request an exception to a policy, seek clarification regarding a service issue, or express dissatisfaction with a decision. If the customer does not receive the answer they were hoping for, they may subsequently characterize that interaction as an unresolved complaint when responding to a survey, even though the interaction may never have progressed beyond a routine customer service inquiry or request. The survey therefore does not establish that respondents were referring to complaints as that term is used in the CCTS process.
15. Nor does the survey provide any insight into the nature or progression of the interaction between the respondent and the service provider. It does not establish whether the customer had made a single contact or multiple contacts, whether the matter had been escalated within the provider's organization, or whether the provider had concluded that it was unable to resolve the matter. These distinctions are significant because the notification obligations are not intended to apply to every customer interaction. Rather, they are intended to ensure that consumers are informed of the

⁸ The Report at page 3, para 4.

CCTS after the service provider has been given a reasonable opportunity to resolve the complaint.

16. The same limitations apply to the finding that 68% of respondents whose complaint was not resolved by their service provider (and who did not submit a complaint to the CCTS) stated that they were not aware of, or did not know about, the CCTS.⁹ The survey does not establish why those respondents lacked awareness, including whether they had received the required information but did not remember it. As a result, the evidentiary record does not permit the Commission to attribute that finding to shortcomings in the existing notification requirements.
17. Similarly, the CCTS annual reports indicate that between 8% and 13% of complainants reported learning about the CCTS from their service provider.¹⁰ A consumer who stated they became aware of the CCTS through an internet search, another organization, or another individual may nevertheless have received the required notification from their service provider during the complaint process. A respondent may also simply not remember receiving that information from their service provider. Accordingly, this data does not provide a reliable basis from which to infer that the existing notification requirements are not achieving their intended purpose. Moreover, it is important to understand that the requirement that service providers inform their customers about the CCTS when a complaint remains unresolved, is one element of a robust public awareness plan by CCTS and with which service providers participate. The fact of the matter is that the CCTS is reporting strong progress in its public awareness efforts and complainants are connecting with the CCTS after learning about it through multiple avenues.¹¹
18. The Commission appears to assume that, if the current notification requirements were functioning effectively, respondents would accurately recall, months later, having received information about the CCTS. That assumption is not supported by the evidentiary record. The objective of the notification requirements is to ensure that consumers receive the information necessary to access the CCTS when it becomes relevant to their complaint. It is not to ensure that consumers retain a lasting memory of that information after their complaint has concluded. The public opinion research

⁹ The Report at page 4, para 6.

¹⁰ Broadcasting and Telecom Notice of Consultation CRTC 2025-274-2, *Call for comments – Improving customer awareness of the Commission for Complaints for Telecom-television Services Inc. – Reinstating the proceeding with changes to procedure*, 23 April 2026, at para 9 [BTNC 2025-274-2].

¹¹ Commission for Complaints for Telecom-television Services, Annual Report 2024–2025 (Ottawa: CCTS, 2025).

measures long-term recall; it does not measure whether consumers were informed at the appropriate stage of the complaint process or whether they had the information available when they needed it. Those are materially different questions, and the latter is the relevant consideration in assessing the effectiveness of the existing notification requirements.

19. The Commission's evidence may reasonably support the observation that some consumers do not later recall how they learned about the CCTS. However, it does not establish that the existing notification requirements are failing to achieve their intended purpose, nor does it demonstrate that consumers who require access to the CCTS are being denied that opportunity because of shortcomings in the current notification framework.
20. Before imposing additional regulatory obligations, the Commission should first establish, on the basis of objective evidence, both the nature of the problem it seeks to address and the causal connection between that problem and the existing notification requirements. In the absence of such evidence, the current record does not provide a sufficient basis to justify additional regulatory intervention, particularly where the Commission's preliminary view would impose significant operational burdens on service providers, and potentially on the CCTS itself, without demonstrating that those obligations would meaningfully improve consumer access to, or outcomes from, the CCTS complaint resolution process. Regulatory action absent a clear, evidentiary foundation risks creating compliance costs disproportionate to any demonstrable benefit and is not consistent with the Government's agenda to reduce red tape.
21. As part of its responses to the Red Tape Review¹², the Commission has stated it is using a regulatory burden lens as it reviews and modernizes its regulatory frameworks to ensure that any new regulations are efficient and proportionate. The CTA respectfully submits that the Commission should apply that same approach in this proceeding and carefully consider the impact of any incremental obligations related to notification of CCTS on both service providers and on the CCTS itself, which is funded by the service providers.

¹² Canadian Radio-television and Telecommunications Commission, Red Tape Reduction Progress Report (23 April 2026), online: CRTC <https://crtc.gc.ca/eng/publications/reports/reduction.htm>.

b. The Commission's Preliminary View Does Not Reflect the Operational Realities of Customer Complaint Resolution

22. The current record does not establish that the existing notification framework is failing or that regulatory intervention is warranted. Even if the Commission concludes otherwise, the changes proposed in Appendix 1 to BTNC 2025-274 would not provide an appropriate or workable solution.¹³
23. The Commission recognizes that "[s]ervice Providers are best placed to explain their customer complaint resolution process. Their detailed understanding of their own processes puts them in a position to propose changes that can be effective and efficient."¹⁴ CTA agrees. Complaint resolution is but one element of customer service operations, and any changes to the regulatory framework should be informed by the practical realities of how customer service functions and how customer complaints are actually handled. Those realities demonstrate that the Commission's preliminary view would be exceptionally difficult and costly to implement and would fundamentally alter the nature of frontline customer service.
24. The Commission's preliminary view that the current requirement to notify customers about the CCTS at the second level of escalation is not achieving its intended purpose assumes that it is readily apparent when a customer interaction becomes a complaint. In practice, it is not. Most interactions begin as routine requests for information or clarification and are resolved without ever being treated as a complaint by either the customer or the representative. An interaction typically crystallizes into a complaint only later, once the customer expresses continued dissatisfaction — a determination that cannot reasonably be made until the interaction has progressed.
25. This operational reality explains why service providers employ tiered complaint resolution processes. Frontline representatives are responsible for answering questions, providing information about service plans, products and options, assisting with account changes, resolving straightforward issues, and addressing customer concerns wherever possible. Matters that cannot be resolved through

¹³ In Appendix 1, the Commission proposes amendments to the Consumer Protection Codes that would require earlier notification of the CCTS during the complaint process, establish new requirements governing "offered solutions" (including written confirmation, record-keeping, and written rationales where no compensation is provided), and maintain existing obligations to include CCTS information in the Critical Information Summary.

frontline customer service interactions, or where customers remain dissatisfied, are then typically escalated to personnel with greater authority, specialized expertise, and/or dedicated complaint resolution responsibilities. The escalation process therefore serves an important operational purpose: it distinguishes between routine customer service interactions and complaints that require more formal review.

26. The Commission's proposal would require frontline representatives to determine, often at the outset, whether an interaction has become a complaint and whether it involves an "offered solution" — a term that is undefined and broad enough to capture routine goodwill gestures or billing adjustments, and a term that CTA submits is vague and unclear. Though framed as a question of timing — when customers should be informed of the CCTS — the proposal would in practice fundamentally change how customer service is delivered, significantly increasing costs and reducing providers' ability to serve customers efficiently.
27. Under the current framework, CCTS notification is triggered once a matter reaches the second level of internal escalation and remains unresolved — by which point it is clearly a formal complaint. The Commission's proposal would move that obligation to the very first point of contact, shifting responsibility for administering complaint-resolution obligations onto frontline representatives whose role is to resolve routine matters quickly and efficiently.
28. Frontline customer service is not meant to act as a formal complaint process. It is often unclear at the outset whether an inquiry will become a complaint. Yet the proposal would require these representatives to make that determination in real time, decide whether a response constitutes an "offered solution," assess whether further notification obligations are triggered, issue prescribed written communications, document their rationale, and maintain compliance records — responsibilities fundamentally different from frontline service's core function, and ones that would transform routine interactions into formal regulatory processes.
29. This shift carries real operational costs. Frontline representatives and their systems are built for real-time resolution, not individualized written documentation. Complying would require either costly restructuring or restricting representatives to standardized, pre-approved responses — reducing flexibility and degrading the customer experience. Providers would also need to redesign workflows, modify CRM systems, retrain staff on inherently judgment-based determinations, and add supervisory oversight. Longer handling times per interaction would, absent

additional staffing, translate into longer wait times, increased costs, and reduced service efficiency across the board.

30. Ultimately, the proposal would not simply adjust notification timing but would relocate formal complaint administration from the point a matter has matured into a complaint to ordinary frontline interactions. This would undermine the Commission's own objective of giving providers a reasonable opportunity to resolve complaints before customers turn to the CCTS, and risks overwhelming the CCTS with premature complaints that could otherwise be resolved directly. Given the absence of evidence of any deficiency in the current framework, and the extensive operational burden the proposal would impose, it is neither efficient nor proportionate and fails to satisfy the 2023 Policy Direction's requirement that regulatory measures be efficient, proportionate, and no more intrusive than necessary.¹⁵

III. CTA's Proposal

31. CTA respectfully submits that the existing notification framework should be maintained, as the current record does not establish that the existing requirements are failing to achieve their intended purpose or that additional regulatory intervention is warranted. Nevertheless, should the Commission conclude that additional measures are appropriate, they should be targeted, operationally workable, proportionate to their objective, and designed to build upon—rather than fundamentally restructure—existing complaint resolution processes.
32. The Commission has recognized that service providers are best placed to explain how their complaint resolution processes operate and to propose changes that are both effective and efficient.¹⁶ Consistent with that principle, CTA and its service provider members propose a targeted enhancement to the existing framework that addresses the Commission's concern regarding customer awareness while preserving the operational integrity of providers' complaint resolution processes.
33. Specifically, CTA proposes that when a customer reaches the second level of escalation, the service provider would provide the customer with a written notification containing information regarding the CCTS no later than two business days after the customer's first interaction at that level, regardless of whether the

¹⁵ 2023 Policy Direction at s 4.

¹⁶ BTNC 2025-274-2 at para 20.

complaint is resolved during that interaction. The notification may be provided by email or another appropriate written communication method that suits the operational realities of the service provider.

34. The two-business-day period strikes an appropriate balance between the Commission's stated objectives. It provides the service provider with an opportunity to engage with the customer and attempt to resolve the complaint following escalation, while ensuring that customers who have made a complaint receive written information about the CCTS early in the formal complaint resolution process. Unlike the Commission's preliminary view, which would require notification after every interaction where a solution is proposed (including routine matters resolved to the customer's satisfaction), the CTA's proposal targets notification to circumstances where it is most likely to benefit customers: when their complaint has progressed beyond ordinary customer service and may require external recourse. It also avoids interrupting the initial escalation discussion, which is often the point at which many complaints are successfully resolved, while ensuring that CCTS information is provided promptly where the complaint continues.
35. This approach aligns the notification requirement with the point at which it is generally clear that the matter has progressed beyond ordinary customer service and has become a formal complaint requiring escalation. It avoids requiring frontline customer service representatives to make subjective determinations regarding whether a customer inquiry constitutes a complaint or whether an "offered solution" has been made, while ensuring that customers whose concerns have not been resolved through ordinary customer service are proactively informed about the CCTS early in the formal complaint resolution process.
36. Requiring the notification to be provided in writing also directly addresses the Commission's concerns regarding customer awareness. A written communication provides customers with information that they can retain and consult if their complaint remains unresolved. It also provides an objective and readily verifiable record that the notification was provided, eliminating uncertainty regarding whether customers were informed about the availability of the CCTS.
37. The following examples are provided for illustrative purposes only to demonstrate how our proposed notification requirement could be implemented in practice. They are not intended to prescribe standardized language or a mandatory format. Service providers should retain flexibility to tailor the content, tone, branding, and method of

communication to align with their existing customer communications, provided the notification clearly informs customers about the CCTS and its role. This flexibility will allow providers to integrate the notification into their existing customer communications in a manner that is effective, operationally efficient, and consistent with their established communication practices.

a. CTA Representative Examples

38. The following representative examples were developed in collaboration with CTA members:

Representative Example #1

Hello [*Customer Name*],

Thank you for contacting [*the escalation team of service provider name*]. We are writing to confirm that your concern has been resolved.

We appreciate the opportunity to address your concerns and thank you for your patience throughout the process.

Sincerely,

[*Customer Service Team at Service Provider*]

If you disagree that the matter is resolved, you may be eligible to escalate your concern to the Commission for Complaints for Telecom-television Services (CCTS), an independent organization that assists consumers and small businesses in resolving complaints about telecommunications and television services. Certain issues fall outside the CCTS' mandate, including (but not limited to): Internet applications or content, emergency services (9-1-1), equipment issues, privacy complaints, security services, networking services, pricing policies, and broadcasting content. Information about the CCTS and its complaint process is available at www.ccts-cprst.ca.

Representative Example #2

Hello [*Customer Name*],

Thank you for contacting [*the escalation team of service provider name*] regarding your concern. We wanted to follow up and let you know that we are continuing to review your matter. If you have any questions in the meantime, please contact us at [*escalation team of service provider name contact information*].

If, after we have attempted to resolve your concern, you feel it has not been resolved to your satisfaction, you have the option to escalate your complaint to the Commission for

Complaints for Telecom-television Services (CCTS), an independent organization that assists consumers and small businesses in resolving complaints about telecommunications and television services. Certain issues fall outside the CCTS' mandate, including (but not limited to): Internet applications or content, emergency services (9-1-1), equipment issues, privacy complaints, security services, networking services, pricing policies, and broadcasting content. Additional information about the CCTS and its complaint process is available at www.ccts-cprst.ca.

Sincerely,

[Customer Service Team at Service Provider]

b. Enhanced CCTS Awareness on Service Provider Websites

39. In addition to the targeted enhancements to CCTS notifications proposed above, CTA recommends that service providers maintain clear, consistent, and easy-to-find information about their complaint resolution process and the CCTS on their websites. Under the CCTS' public awareness plan¹⁷ service providers must maintain a dedicated complaints page with CCTS information that is clearly labelled and easy to find and within two clicks from their home page. CTA proposes to enhance this via a persistent link that would make the complaint resolution process and information about CCTS easier for customers to identify. This approach reinforces that the CCTS is an important part of the complaint resolution framework—but not the first step—and provides consumers with accessible information about independent recourse where their concerns remain unresolved.

40. Specifically, service providers would include a clearly labelled link to a complaints or customer resolution page within persistent site-wide navigation, such as a website footer, top-level menu item, or equivalent mechanism. This would ensure that customers can access complaint-related information in a single click from any page on a service provider's website.

41. The linked page would include the existing prescribed CCTS awareness message and wording. Service providers would retain flexibility to explain their own complaint-handling and escalation processes, allowing them to provide accurate and relevant information that reflects their specific organizational structures and procedures.

¹⁷ Commission for Complaints for Telecom-television Services, Developing Public Awareness of the CCTS, online: CCTS <https://www.ccts-cprst.ca/industry/public-awareness>.

42. This approach mirrors and builds upon the Commission's existing requirements under the Wireless Code and Internet Code that service providers make consumer protection information and Code-related rights readily accessible to customers.¹⁸ Elevating complaints and dispute resolution information to persistent site-wide navigation would bring awareness of the CCTS into alignment with the level of accessibility that the Commission has already determined to be appropriate for key consumer protection information.
43. Unlike the Commission's proposed changes to customer interactions, this proposal would provide ongoing and readily accessible information to all customers while minimizing operational complexity and administrative burden. It would also improve awareness in a manner that is consistent, transparent, and easily adaptable across different service providers and service offerings.
44. Because service provider websites are often the starting point for customers seeking assistance, this approach ensures that information about the CCTS is readily available throughout the complaint resolution process. Customers whose complaints remain unresolved will therefore already be aware of their options for independent recourse. This represents a targeted and proportionate means of advancing the Commission's objective of improving consumer awareness while remaining consistent with the 2023 Policy Direction's requirement that regulatory measures be efficient and proportionate to their purpose.

c. Improving Consumer Awareness Is a Shared Responsibility

45. While this proceeding is primarily focused on the timing of CCTS notifications during the complaint resolution process, improving consumer awareness requires more than simply changing how customers are informed about the CCTS. The Commission itself has recognized that ensuring customers understand the complaint resolution framework is a broader consumer protection objective and has identified this proceeding as one of several initiatives under its Consumer Protections Action Plan aimed at improving consumer awareness and strengthening complaint resolution.¹⁹

¹⁸ Telecom Regulatory Policy CRTC 2017-200, *Review of the Wireless Code*, (15 June 2017) at para 6; Telecom Regulatory Policy CRTC 2019-269: *Internet Code*, 2019-269 (31 July 2019) at paras 6–8.

¹⁹ Broadcasting and Telecom Notice of Consultation CRTC 2025-274, *Call for comments – Improving customer awareness of the Commission for Complaints for Telecom-television Services Inc.*, (7 October 2025) at Summary para 5.

46. As discussed above, the record of this proceeding does not establish that the existing notification framework is failing to achieve its intended purpose or that additional regulatory obligations on service providers are warranted. Nevertheless, improving consumer awareness is a shared responsibility. While service providers have an important role in informing customers about their internal complaint resolution processes and, where appropriate, the availability of the CCTS, the Commission and the CCTS also have an important role in ensuring that publicly available information clearly explains how the complaint resolution framework operates, including the role of the CCTS, the scope of its mandate, and when and how it should be engaged. CTA urges the Commission to undertake its own review of CRTC and CCTS public-facing materials as part of this proceeding.
47. In particular, greater emphasis should be placed on communicating that the CCTS is an independent dispute resolution body intended to assist customers who are unable to resolve their concerns directly with their service provider, rather than the starting point for customer complaints. Public-facing materials should also more prominently explain that customers are expected to first provide their service provider with a reasonable opportunity to resolve the matter before seeking assistance from the CCTS.
48. For example, the CCTS' "Complaint Resolution Process Explained" webpage notes that accepted complaints are first referred back to the service provider for resolution. However, there is insufficient emphasis that an important feature of the complaint process is that a consumer must first make reasonable efforts to resolve their complaint directly with their service provider prior to engaging the CCTS.²⁰ The Commission's own webpage on making an Internet complaint similarly places a link to the CCTS at the very top of the page without equally emphasizing that the provider must first have a reasonable opportunity to resolve the complaint.²¹
49. These measures fall within the direct control of the Commission and the CCTS, can be implemented without imposing additional regulatory obligations on service providers, and would complement the targeted enhancements proposed by CTA. Improving public-facing information in this manner would enhance consumer

²⁰ Commission for Complaints for Telecom-television Services, "Complaint Resolution Process Explained", online: CCTS <https://www.ccts-cprst.ca/for-consumers/telecom-complaints/complaints-process-explained/>.

²¹ Canadian Radio-television and Telecommunications Commission, How to Make a Complaint About Your Internet Service, online: CRTC <https://crtc.gc.ca/eng/internet/plaint.htm>.

understanding of the complaint resolution framework while reinforcing the intended role of the CCTS as an independent dispute resolution body for complaints that remain unresolved after the service provider has had a reasonable opportunity to address them.

IV. Conclusion

50. The record of this proceeding does not establish that the existing notification framework is failing to achieve its intended purpose or that additional regulatory obligations on service providers are warranted. While the Commission's evidence suggests that some consumers may not later recall how they learned about the CCTS, it does not demonstrate that consumers who require access to the CCTS are being denied that opportunity because of shortcomings in the existing notification framework.
51. Even if the Commission concludes that changes to the existing framework should be considered, the Commission's preliminary view would fundamentally redesign customer service interactions and complaint resolution by making the CCTS a frontline complaints resolution body, rather than an ombudsman service for unresolved issues. As our submissions explain, such an approach does not reflect the operational realities of customer service, would impose significant implementation and ongoing operational costs, is contrary to the intended role of the CCTS, and would not satisfy the 2023 Policy Direction's requirement that regulatory measures be efficient and proportionate to their purpose. The Commission should avoid regulatory changes that would transform the essential character of the CCTS without a clear evidentiary basis for doing so.
52. CTA respectfully submits that the existing notification framework should therefore be maintained. However, should the Commission determine that additional measures are warranted, those measures should build upon existing complaint resolution processes rather than fundamentally redesigning them.
53. CTA's proposed enhancements strike that balance. They provide customers with timely written notification regarding the CCTS once a complaint has progressed to formal escalation, improve the accessibility of complaint resolution information through service providers' websites, reinforce the intended role of the CCTS within the complaint resolution framework, and preserve the Commission's objective of ensuring that service providers have a reasonable opportunity to resolve complaints before the CCTS becomes involved. CTA submits that, if the Commission adopts

additional regulatory obligations, service providers should be provided with a minimum implementation period of 12 months to ensure they have sufficient time to make the necessary operational and system changes to achieve compliance.

54. For these reasons, CTA respectfully submits that its proposals represent a targeted, operationally workable, and proportionate approach that advances the Commission's objectives while preserving the efficiency and effectiveness of customer complaint resolution.

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