

CONSUMERS COUNCIL OF CANADA

Before the Canadian Radio-television and
Telecommunications Commission

Broadcasting and Telecom Notice of Consultation
CRTC 2015-239, as amended by 2015-239-01

Review of the structure and mandate of the
Commissioner for Complaints for
Telecommunications Services Inc.

COMMENTS

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I SUMMARY

- ES 1 The Consumers Council of Canada has a clear interest in the improvement of the public's awareness of the CCTS, its real and perceived independence, the effectiveness of processing complaints, and, perhaps most importantly, the capturing, and reducing abandonment, of unresolved complaints for resolution.
- ES 2 We believe that the number of unresolved complaints with TSPs that do not make it to the CCTS, for any number of reasons, is significant, probably many times more than those that do make it. We estimate that approximately 43,500,000 contracts are eligible for CCTS services and resolution. For these 43,500,000 contracts there were only 11,340 complaints filed with the CCTS last year. That's about one complaint for every 4,000 contracts. Who can stand up and truly say they believe that is even close to the real number?
- ES 3 We are taking care to not repeat information in our initial intervention, but believe that we will repeat this one recommendation as background in reading our comments. We recommended that the CCTS, in conjunction with a multi-stakeholder panel, conduct three comprehensive surveys, one for each of Telephone Services, Internet Access Services, and Wireless Services, with the objective of determining the following in enough detail to get statistical information by various demographics and by TSP:
- A Level of awareness of existence of an independent ombudsman for this service.
 - B How people became aware of CCTS, if they know about it
 - C Level of unresolved complaints
 - D Nature of unresolved complaints
 - E Effectiveness of PA campaign by TSPs - by phone and by notification or website.
 - F For those with an unresolved Complaint the reasons for not using CCTS.
 - G Specifically, what consumers would expect their TSP to do to tell them about how to use the services of the CCTS.

- ES 4 Having reviewed the submissions we have a series of comments and recommendations, summarized in this section.
- ES 5 Our resolve for our recommendation to conduct a comprehensive multi-stakeholder survey is only strengthened after reviewing the submission to CRTC 2015-239, particularly those of the TSPs.
- ES 6 In our initial submission we did not specifically include the TVSPs in our survey recommendations, as we did not address any of the questions relating to including the TVSPs in the CCTS's mandate. However, we note that they should be included in the survey and that the determination as to how they would be included may be aided with information gleaned from this review.
- ES 7 Some of the TSPs argue that the goal should be to resolve most issues internally - that it should happen first within the business organization and only in rare cases need to go to an external, independent Ombudsperson. We do not believe we are at that point yet. We want an outcome of consumers rights protection, and are less concerned about how it is done - other than it must be done reasonably and fairly. We do not have the confidence that it is being done now by the TSPs. If they want the privilege of resolving all themselves, they need to take the responsibility.
- ES 8 There appears to be a weak point in the actions by the TSPs relating to informing customers of the CCTS, particularly when on a customer service support call. The TSPs do not agree with this, but evidence from the CCTS and anecdotal evidence presented to the CCC would suggest otherwise. There appears to be a discrepancy in what escalation means and at what point. This should be made clearer. It appears that not all TSPs have the same definition of when to escalate to, or inform about, the CCTS.
- ES 9 We suggest, like U-Hauls customer support program, that customers be given the option of receiving an electronic copy/recording of any support call with a TSP. It's simple, and supports the TSPs commitment to customers.
- ES 10 There should be an increase in enforcement by the CRTC and the CCTS. There appears to be a real need. The TSPs don't suggest it, except to enforce what is to their advantage (e.g., invalid complaints). We would suggest waiting for the outcome of the survey to take any significant action.

- ES 11 We suggest that the TSPs change their method of quarterly notification through their billing. We suggest that they simplify matters by taking the approach that Vonage has. Send a separate notice with just CCTS information on it clearly marked. In light of that change it may even be considered that two times a year is sufficient for such notification - two clear notifications a year, rather than four a year buried in a long text heavy bill.
- ES 12 While we commend Rogers for being “first on the block” in North America with a Telco Ombudsperson, we find that their mobile implementation for access to this site to be woefully inadequate, and dare we say, an embarrassment for an organization that prides itself on its mobile devices and capabilities.

II INTRODUCTION

- 5 These comments by the Consumers Council of Canada (“the Council”), a not-for-profit organization that supports the protection and strengthening of consumers’ rights, submits its comments to this proceeding. The Council supports an improved marketplace, and focuses its advocacy on the rights and responsibilities of consumers.
- 6 Our comments on submissions to this consultation have two primary focuses: one, public awareness, particularly the degree, demographics, and nature of unresolved consumer complaints; two, what the CCTS and the TSPs should do to bring public awareness to the optimum level. We have categorized our comments by the CCTS’s submission and individual TSPs’ submissions.

III COMMENTS ON CCTS and TSPs SUBMISSIONS

- 7 Items below in *Italics* are excerpts from each of the submissions/interventions. Following that are our comments relating to that specific comment. The paragraph number of the excerpt is at the beginning of each excerpt.

A CCTS

Use information gleaned from telephone calls and correspondence for analysis

- 8 *Par. 14 - CCTS’ Contact Centre handled over 50,000 pieces of written correspondence and responded to more than 130,000 customer phone calls. The calls and correspondence received cover a wide range of*

issues including inquiries about CCTS and its role and processes, the customer's service provider, telecommunications issues in general, and TWC, among others.

- 9 An examination of the content, or quantitative summaries, of the written correspondence and purpose and resolution of phone calls may be useful evidence in determining the level of public awareness. Not knowing the details of how much information is gleaned from these calls or correspondence, we cannot opine directly but we suggest that the CCTS review them if not done already. Furthermore, they should consider changing processes to ask questions or gather other information at the time that may be relevant in assessing the degree, demographics, and nature of public awareness.

TSPs surprisingly uncooperative in gathering survey information

- 10 *Par. 24 - Based on the information provided by the 47 respondents, there is not full compliance in any of the five areas identified above. For those PSPs which publish White Pages, 75% report that their publication contains the required CCTS notice, with text that matches that required by the Plan. Of the responding service providers with a website, 81% have the required notice and provide a link to the CCTS site, as required by the Plan. However, of the 26 providers with a website featuring a search function, only 8% are fully compliant with the requirement that the search function return a hit to the CCTS notice/link page of their site for all seven of the prescribed search terms. Compliance with the bill message requirement is self-reported at 66% for customers receiving a monthly bill and 35% for customers that do not receive a monthly bill. Customer notification of CCTS by the service provider when it is unable to resolve a complaint at the second level of escalation is the most important and perhaps the most contentious requirement. It is also difficult to measure due to the varied internal complaint escalation processes of service providers. However, based on CCTS' analysis of the responses, only 32% of respondents comply with this requirement of the Plan. As noted a summary of the full analysis is provided in Appendix 4.*
- 11 If the TSPs can't meet requirements, then how can they be relied upon to meet customer needs for support and complaint resolution? In CCTS Appendix 4 they sent out 133 survey requests to TSPs and got 47 back for 35% - that does not speak

to commitment. Furthermore, only 32% of TSPs that responded were compliant with internal complaint escalation. This clearly contradicts the submissions of many of the TSPs.

- 12 *Par. 28 - Finally, CCTS reiterates the remarks made in response to the Commission's Requests for Information about the need for the development of a compliance/enforcement process for CCTS matters. Under section 3.1 of the CCTS Participation Agreement (the contract for services between CCTS and its PSPs), the PSPs contract to "adhere to, be bound by and observe" the Agreement, the Procedural Code, and the public awareness plan (described in the Agreement as the "communications" plan). As discussed in CCTS(CRTC)4Jun15-2 NC 2015-239, PSP compliance is an operational challenge and CCTS is seeking to work with the Commission to put in place a more robust regime to deal with non-compliance. This could extend to public awareness measures, as well as other compliance issues related to the requirements of the Participation Agreement and the Procedural Code.*
- 13 Agreed. There appears to be a real need for this, but this goes to having an earlier review on this point, and based on a multi-stakeholder survey, considering significant changes in the enforcement and compliance efforts.
- B Bell Canada**
- What's good for the goose is good for the gander*
- 14 *Par. ES 2 a. Each year the CCTS should analyze a random sample of complaints to which a participating service provider has objected, to determine the extent to which out-of-scope complaints have been improperly accepted;*
- 15 *Par. ES 2 h. The CCTS should track and report invalid complaints as a separate category of activity and remove all such customer issues from complaint counts; or when reporting complaint volumes, identify which complaints were subsequently determined to be invalid;*
- 16 Bell is clearly concerned about the degree of invalid complaints that come to the CCTS. Fair enough. We are just as concerned about valid complaints that don't make it to the CCTS.

Working together to see what some consumers are saying

17 *Par. 23. Lastly, to promote itself the CCTS should actively participate in relevant consumer forums, blogs and websites.*

18 We agree. We suggested this in our initial submission. We assume that Bell and the other TSPs with their considerable resources and efforts regarding social media may be able to assist the CCTS in this area, providing them with relevant lists of sites that could help aid TSP customers. We would like to see the TSPs and the CCTS work more closely together here.

Public awareness is more than just existing customers of the CCTS

19 *Par. 28. The effectiveness of public awareness initiatives should be measured by including an additional question on the annual customer survey. For example, the survey could ask how the complainant became aware of the CCTS. The answer to this type of question would provide insights into which communication channels are most effective, and could be used to refine the CCTS's awareness efforts.*

20 We agree, and believe it will provide good evidence. But it can't supplant a larger survey regarding public awareness. While it would be useful, and quite possibly indicate that the TSPs are not directing customers to the CCTS, it still does not address the issue of the degree, demographics, and nature of unresolved complaints that do NOT make it to the CCTS.

Where is the evidence?

21 *Par. 26. CCTS participant's current efforts to promote the CCTS are sufficient.*

22 We can only assume that this is solely an opinion. Bell did not provide any facts or evidence supporting this.

Bell improves customer satisfaction ranking but remains below average

23 *Par. 7 - A recent survey also cited Bell Canada as the most improved in customer service among full-service wireless carriers.*

- 24 We are surprised that Bell is citing a survey that shows them at the bottom with Rogers as the only two wireless providers with below average Customer Satisfaction Rankings.¹
- 25 *17. The use of surveys is a widely accepted method of effectively collecting customer feedback.*
- 26 Like many of the other TSPs Bell is supportive, in general, of surveys for customer feedback.

C Canadian Network Operators Consortium Inc.

- 27 *Par. 15. In addition, participating service providers are required to notify customers about the CCTS and the recourse offered by the CCTS during the service provider's internal complaint handling process when a complaint remains unresolved. Notably, this requirement ensures that all customers are aware of their recourse to the CCTS when such recourse is actually required (i.e., when they are unable to resolve a complaint with their service provider).*
- 28 It appears that the TSPs are not significantly in compliance, given the results of the survey conducted by the CCTS in May 2015.² Of the scant 35% of TSPs surveyed that replied the majority were not in compliance.
- Is it really that difficult for a technology company to add information to a bill, a support script, and a website?***
- 29 *Par. 16. CNOC submits that the current measures undertaken by participating providers sufficiently promote the awareness of the CCTS. These measures increase the general awareness of the CCTS by all customers of participating service providers and ensure that customers are informed of their recourse to the CCTS at the time when they have a complaint that they are unable to resolve.*
- 30 *Par. 17 - CNOC is also of the view that the current measures result in the promotion of the CCTS by participating service providers to the*

¹ http://canada.jdpower.com/sites/default/files/2015059%20Canadian-Wireless%20Customer%20Care_Final.pdf

² CCTS Comments Aug 25, 2011

greatest extent feasible. In this regard it important to recognize that participating service providers must allocate resources and incur expenses in order to satisfy their public awareness obligations. This is of specific concern to smaller participating service providers that must redirect portions of their limited resources in order to satisfy the public awareness obligations. The placement of additional obligations would therefore represent a further strain on the limited resources of small participating service providers.

- 31 We must ask the question, “How much does it cost to add text to a bill quarterly, change relevant pages on a website, and ensure that training material indicates when a customer service representative is to advise of the CCTS?” These are technology companies that do this sort of thing as a main part of their business - marketing. We submit that they are more efficient than this statement would imply.

Do they really think that many consumers are fraudulent?

- 32 *Par. 56 - In addition, general customer awareness of complaint-based fees is of a concern as this information may be used as leverage to obtain a credit despite no wrongdoing by the service provider. In such cases, the service provider is incited simply to provide a resolution, such as a credit, that is less or equal to the pre- investigation complaint-based fee when a customer threatens to file a complaint with the CCTS.*

- 33 We find this statement rather disturbing. If our reading is correct, and we believe it is, there is a clear implication that consumers are perpetrating fraud - demanding a cash amount where they know that they are in the wrong. If that is the approach this industry association takes, how can the organizations they represent expect consumers to believe what they say or commit to?

D Cogeco Cable

Where is the evidence?

- 34 *Par. 14 In general, the 2009 CCTS awareness campaign and subsequent update, with the suite of activities to which the participating telecommunications service providers (TSPs) committed themselves, has worked well.*

- 35 We fail to see the evidence supporting this statement.

Perhaps make the CCTS Notice clearer, uncomplicating the efforts of the TSPs

36 *Par. 17. With respect to referencing the CCTS on bill messages (whether paper or electronic), Cogeco feels this is not the proper tool for raising awareness of the existence of the CCTS and is limited in its effectiveness.*

37 *Par. 18. A typical Cogeco bill will present a lot of information of various nature related to the services offered by Cogeco. Furthermore, we have competing demands for bill messages and since space is limited, it can be quite challenging to manage the various communications. Some examples of messages include, but are not limited to, payment reminders to avoid interest charges, legal notices such as for PIPEDA, freeview announcements or other marketing activities, and corporate events promotions.*

38 *Par. 19. The significant amount and ever-changing nature of the information included on bills may not capture the consumer's attention, assuming the bill is even read all the time, which is certainly not a given. We therefore propose that providers be afforded the latitude to communicate this message "in such other manner as will come to the attention of these customers", as is the case currently with the notification requirements for customers who do not receive bills² and remove the current requirement all together, that could be replaced with other measures discussed below. However, should the Commission decide that it is in the public interest to maintain this requirement, we would recommend reducing the number of times the message appears on the bill to twice a year, given our view that the current measure has limited effectiveness.*

39 We believe that Cogeco has a point here. We suggest that they simplify matters by taking the approach that Vonage has. A simple quarterly email stating information about the CCTS. In light of that change it may even be considered that two times a year is sufficient for such notification - two clear notifications a year, rather than four a year buried in a long text heavy bill.

E Rogers Communications

Where is the evidence?

40 *Par. E5. The current approach to public awareness by both the CCTS and telecommunications service providers (TSPs) is effective and should remain unchanged. It is unnecessary for the CCTS to engage in further outreach, as the comprehensive activities currently undertaken have proven successful.*

41 Once again, we fail to see the evidence. None has been provided.

Concerns regarding the accessibility of the Rogers Ombudsperson from mobile devices

42 *Par. 1. Rogers has a strong commitment to customer service. We ensure that our customers have a clear, structured process to resolving disputes with us, including ultimately having complaints reviewed by the Rogers' Ombudsperson. Our Ombudsperson provides an impartial review of complaints for all Rogers' services, raises awareness about Rogers' process for resolving complaints, and makes it easier for customers to get their issues resolved on a timely basis at Rogers. Rogers is the only telecommunications provider in North America with an Ombudsperson.*

43 We do comment Rogers for being the only telecommunications provider in North America with an Ombudsperson, we have some concerns about the accessibility of Rogers Ombudsperson. Following is what we found, most of it less than stellar:

- Firstly, when searching a mobile device for the term “ombudsperson” no results are returned. It is only when “ombudsman” is searched do the results show for the Office of the Ombudsperson page.
- The webpage that appears when the single search result is clicked is not mobile friendly.
- The same search result comes up when searching for the word complaint from the Rogers mobile home page.
- The first link “management team” ghost to the generic Contact Us page. Albeit, this page is mobile friendly

- The second link for office of the Pres. goes to the generic Contact Us page.
- There is no direct phone number, only a fax number.
- There is an email address, but it is not clickable so it is not easy to directly email from this page.
- There is, of course, a postal address.
- The two most effective links on the page are to the CCTS website and a direct link to the CCTS phone number, but there is no description of what the CCTS is.
- There is a link to a message from the Office of the Ombudsperson, which is mobile friendly, and talks about the performance of the office over the last year, and it is only from here that one is able to access a separate menu with details. This is buried in the middle of the page and not obvious as the path to a mobile friendly site.
- Furthermore, on a mobile device, there is no access to the ombudsperson page from the contact us page or the main page. Even more surprisingly, there is no access from the support page. This is the same for the main site of rogers.com on a desktop.
- They do however, have marked very clearly at the top of the ombudsman page the phrases ‘Helping Our Customers’ and “MAKING IT EASY FOR YOU”.

44 We think these comments speak for themselves. This is less than acceptable effort of communication for an ombudsperson.

45 *Par. 14. Rogers submits that the surveys are a reasonable and effective approach to measuring consumer satisfaction with the CCTS.*

46 We agree. We are recommending an extensive survey program.

Rogers considers a non mobile-friendly site for the CCTS to be clear and acceptable

47 *Par. 16 The CCTS has a clear, functional website that is easily found.*

48 No and yes. It is not clear, barely functional on a mobile and yes it is easily found. It is not particularly useable on a mobile device. It does not even work in

Apple iOS's Reader View which can generally stand in for a badly designed website.

Are the CCTS's public awareness activities extensive and comprehensive?

- 49 *Par. 16. The current approach to ensuring public awareness of the CCTS is effective and should continue unchanged. The comprehensive public awareness and outreach activities currently undertaken by the CCTS have proven to be successful. The CCTS has a clear, functional website that is easily found. The Commission's website also provides information about the CCTS and directions to the CCTS website in a prominent location. These online presences implemented over the past seven years have been effective in making the public aware of the CCTS. The CCTS has also run extensive promotional campaigns. The CCTS has also been very aggressive in promoting its Annual Report and now its new Semi-Annual Report, generating extensive print, radio and television coverage. Such prestigious media channels as the CBC National News at 10:00pm have run lengthy segments on the CCTS and its handling of complaints received over the previous year. Rogers does not believe there is a specific consumer segment that should be emphasized in the promotional campaigns.*

- 50 We are not aware of extensive promotional campaigns. The CCTS has run some campaigns, particularly around the release of the annual and mid-term reports but it would hardly be called extensive, particularly in comparison to the truly extensive marketing of an organization such as Rogers.

Costs borne by customer for notification, compared to costs borne for marketing

- 51 *Par. 17. For their part, the CCTS participants promote the CCTS through bill messages, on their websites, and in wireless service agreements. Rogers believes that these measures are effective and comprehensive, balancing promotion of the CCTS with the cost of such promotion which ultimately is borne by customers.*

- 52 What is the real cost of adding those messages? Compare it to the marketing costs of TSPs many coloured marketing pieces that litter mailboxes and inboxes. What is the cost of some website modifications, printing on bills and agreements

or a focused email two or four times a year? It can't compare to marketing cost that "borne by customers" for marketing services.

F TBaytel

Where is the evidence?

53 *Par. 21. TBaytel believes that the low number of accepted complaints in relation to the potential number of complaints is not the result of unawareness of the CCTS, but rather the result of the continued efforts of the TSPs in meeting the needs and wishes of their customers.*

54 We would like to see the evidence that supports this statement of belief.

Public Awareness can be measured

55 *Par. 24. The effectiveness of public awareness can not be measured, and why should it, to what end? Any method used would render meaningless results. For example, more complaints mean more awareness, or just the CCTS turning a customer's single concern into multiple complaints?*

56 It can be measured. This has been proven repeatedly by any one of Canada's national research and polling firms. Ipsos Reid, Decima Harris and Environics come to mind. Many of the other TSPs clearly indicate their support for survey as a way to measure effectively. "To what end?" TBaytel asks. Well, to determine the degree, the demographics and nature of unresolved complaints, some of which may relate to TBaytel. More complaints do not necessarily mean more awareness, and with a multi-stakeholder group overseeing such a survey we believe that questions that lack objectivity would be culled.

Isn't this what an Ombudsperson does?

57 *Par. 30 - On the whole, TBaytel, has not seen the impartiality mentioned above, rather it is seen the CCTS pursue TBaytel, albeit consistent with its mandate as a Consumer-first agency. to have it provide remedies to "aggrieved" customers in those cases where TBaytel already reviewed and made a decision contrary to what the customer is seeking.*

58 Is this not what an ombudsperson is for? They should investigate complaints, and based on the facts and the rules decide appropriately. In some cases, they will rule against a company that has "made a decision contrary to what the customer is seeking".

G Telus

Dealing with the facts as they are now, rather than what they should be

- 59 *Par. 3 The ultimate public policy goal however is the fostering of an environment where the need for the CCTS' services is diminished, i.e. where fewer and fewer consumers feel the need to complain to the CCTS regarding their communications service provider. It is with this ultimate goal in mind that TELUS has responded to the specific questions set out in the Commission's Notice of Consultation.*
- 60 While answering the questions with the ultimate goal in mind, it is nevertheless critical to deal with the situation as it is presented today. We believe we are not at the point where the need for the CCTS is diminished, and want to establish where we truly are with a comprehensive multi-stakeholder survey.
- 61 *Par. 8 In TELUS' view, the overarching public policy goal will best be met when:*
- service providers take ownership of customer service issues;*
 - customers are able to resolve points of difference directly with their service providers; and*
 - failing resolution, consumers are able to easily find and contact the CCTS on those occasions when they remain dissatisfied despite the service provider making its best efforts to resolve the complaint through the company's customer service process.*
- 62 Yes, but TSPs do not always make their best effort. It is a goal but until then we need to determine the facts as they stand today.
- 63 *Par. 10 As long as customers who have unresolved issues know that there is somewhere where they can complain and when they do so that the complaint ultimately makes its way to the CCTS (whether directly or indirectly by having first been filed with another agency who will refer the complaint back to the CCTS), should be what matters most.*
- 64 This will be determined through a survey. It may also be a case for a significant round of inspections particularly around telephone customer service and how and when they escalate to the CCTS or inform the customer appropriately.

- 65 *Par. 20 In light of the above, we should not be surprised that over the past two years the number of complaints to the CCTS has actually declined. It would be a mistake to assume that such a trend, if it continues, would necessarily indicate of a lack of public awareness of the CCTS. Rather, declining trends can very well be an indication that customer service has improved over the past seven years, that customers are happy with their service providers, and that the overarching public policy goal is being achieved.*
- 66 Yes, it can be that. It can also just as easily be that there is a significant number of unresolved complaints that would other wise make it to the CCTS.
- 67 *Par. 26 Further, the CCTS should provide greater transparency regarding its surveys. For example, important information regarding how the surveys were administered is not made available on the public record. This includes information such as details in relation to the sample of customers surveyed (confidence level, confidence interval, sample sizes versus the total target population, demographic representation, providers representation). In addition, there is no verification of the party that managed the surveys, such as whether the surveys are designed and managed by CCTS itself or via an independent third-party.*
- 68 *We believe that a multi-stakeholder survey will meet this requirement, more effectively than through transparency of one organization.*
- 69 *Par. 32 The degree of awareness of the CCTS is most important for customers at the time they wish to make a complaint regarding telecommunications services. In other words, the target in terms of CCTS awareness is not necessarily that the highest percentage of customers across the country knows who the CCTS is and what it can do for them. What is more important is that when customers who need to make a complaint are able to find, in an effective and efficient way, the relevant information to access the CCTS. That is the point in time when finding out about the CCTS becomes critical and most important. To that end, what is relevant is the concept of “discoverability” of the CCTS by consumers when they are actually facing a customer service issue.*

70 Agreed. This is a key question, or objective, for a multi-stakeholder survey.

71 *Par. 38. In addition, TELUS has reviewed the CCTS' current approach to developing public awareness and notes the following measures are already in place:*

- . c) Customers must be notified about their right of recourse to the CCTS following the second level of escalation in the company's internal complaints process.*

72 *Par. 40 TELUS notes that the CCTS conducted a "compliance survey" in May 2015 with all Participating Service Providers to gauge compliance with the elements of the CCTS' Public Awareness plan, as described in the paragraph above. TELUS provided its responses to the CCTS for our TELUS, Koodo and Public Mobile brands on May 25, 2015. In this survey form, TELUS confirmed its compliance with the CCTS' Public Awareness Plan and provided the CCTS with various messages that the TELUS brands provide on their websites, bill messages and white pages (in the operating regions where applicable).*

73 We believe that most, if not all, TSPs are making efforts in this area. These efforts and their results, we believe, will become even clearer through a multi-stakeholder survey, designed to ensure statistical supportability at the TSP level.

H SaskTel

Where is the evidence?

74 *15 SaskTel's view is that the CCTS does not need to undertake further public awareness campaigns when the level of awareness is already appropriate and working. Customers who have a valid complaint, and have been through a company's internal complaint escalation process without success, are provided the contact information for the CCTS. Furthermore, all customers are made aware of the CCTS through the before mentioned awareness policies provided by each company. A full public awareness promotional campaign through advertisements, social media, and other avenues as envisioned would undoubtedly drive additional complaints to the CCTS. Moreover, it is very likely that many of these additional complaints would not likely go through the TSP or TVSP complaint handling and escalation process. SaskTel wants*

to ensure that we first be given the opportunity to handle a customer concern before the customer turns to the CCTS. There is a distinct possibility that the customer could circumvent the TSP or TVSP complaint handling process by going directly to the CCTS, so it's important that the CCTS have safeguards in place to prevent this from occurring.

- 75 While we question again, statements like above, that “the CCTS does not need to undertake further public awareness campaigns when the level of awareness is already appropriate and working.” We have yet to see any compelling evidence.

Appreciating that there is a delicate balance

- 76 *Par. 16 There is a delicate balance between promoting the existence of the CCTS and creating a misguided customer perception that the first recourse for a dispute is to contact the CCTS rather than reaching an amicable resolution of the dispute with the service provider.*
- 77 Well put, and we believe it is thinking like this that should be part of the input from a multi-stakeholder survey team.

I Shaw Communications Inc.

- 78 *Par. 17 In BTNC 2015-239, the Commission cites a 2014 Harris poll showing that only 13% of wireless customers were aware of the CCTS. The Commission then suggests there is “limited” customer awareness of the CCTS. Shaw does not concur with the Commission’s inference that there is a general lack of awareness. Further, the salient issue is not whether all Canadians are aware of the CCTS but rather whether there is sufficient awareness amongst customers that have a need to use the services of the CCTS. Specifically, those customers who have a complaint that they are unable to resolve with their service provider.*
- 79 We agree that there needs to be sufficient awareness amongst customers that have a need to use the services of the CCTS. We believe that our recommended survey will accomplish this in a meaningful way. It will also determine whether there is a “general lack of awareness”. While Shaw “does not concur that there is a general lack of awareness”, they provide no evidence to support this.

- 80 *Par. 19 We also wish to bring to the Commission's attention that CCTS responses to the requests for information corroborates Shaw's view that it is appropriate that consumers need only become aware of the CCTS once a complaint arises and, therefore, there is no need to increase general awareness of the CCTS. In its responses, CCTS expressly states that awareness is a function of "experiencing a problem". Shaw also notes that the steps described by CCTS to "make itself better-known to the public" through a variety of methods, further mitigates concerns with respect to customer awareness.*
- 81 If the efforts made by the TSPs ensured that customers are informed at the appropriate time about the CCTS then we would be less concerned about surveying for public awareness. However, the CCTS has demonstrated with the results of their May 2015 survey to the TSPs, that this is not the case. We believe that our recommended survey will bring an objective answer to this question.

*** End of document ***