

Shaw Communications
Opening Remarks
Broadcasting and Telecom Notice of Consultation CRTC 2015-239
Review of the structure and mandate of the Commissioner for
Complaints for Telecommunications Services Inc.
November 5, 2015

[Morgan]

Good morning/afternoon Mr. Chairman, Vice-Chairman Menzies and Commissioners.

I am Morgan Elliott, Senior Vice President of Regulatory and Government Relations at Shaw Communications. I am joined today by Sarah Miller Wright, Vice President of Customer Care and members of our Regulatory team: Dean Shaikh, Paul Cowling and Esther Snow.

Shaw is pleased to participate in this conversation about the mandate and structure of the CCTS. There is nothing more important to Shaw than understanding and responding to the needs, expectations and concerns of our customers.

We operate in highly competitive and dynamic broadcasting and telecom markets. In this environment, everything pivots around our customers – from the design of our products and service offerings to anticipating and addressing customer concerns. When we can't foresee concerns, or issues come up, Shaw brings a similar focus and determination to resolving things as efficiently and effectively as possible. Our success or failure in these efforts determines our success or failure as a business.

Shaw strives to listen to our customers and provide best in class service. But there are times when people feel more comfortable having a third party assist them. This is where the CCTS comes in, playing a complementary and important function, along-side Shaw's own complaint resolution process.

Since its inception, the CCTS has provided a valuable service to Canadian consumers. This record reflects that Canadians are highly satisfied with the organization's effectiveness. There is also overwhelming agreement among the parties to the proceeding, including the CCTS itself, that things are working well.

Like Shaw, most parties are pleased with the current scope of responsibilities and structure of the organization. With the addition of the TVSP Code, the mandate will now extend beyond deregulated telecommunications services, but in a way that is consistent in scope with the current mandate. As with the Wireless Code and the Deposit and Disconnection Code, Shaw is confident that the CCTS can incorporate the TVSP Code into its responsibilities without disruption to its operations and governance.

In the eight years since the CCTS was created, it has developed a track record of success. This has been driven by an effective governance model that features appropriate representation from the industry and consumer groups, which is further balanced by independent directors. The organization itself has not recommended any major modifications.

Over the course of this proceeding, we have seen some parties request fundamental changes to the role and function of the CCTS. They suggest the ombudsman should cover broad new areas, such as bundled features, content, equipment and accessibility.

We believe the CCTS does a great job. But we should be wary of expanding its mandate in a manner that would undermine the original intent and the role it currently plays so effectively. Significant changes would place a major burden on CCTS staff by requiring them to become experts in multiple and complex topics. This would create delays for the resolution of consumer complaints.

Several of the areas proposed for more CCTS involvement are already governed by regulatory regimes overseen by the CRTC and Competition Bureau, such as advertising, programming, regulated wholesale services and accessibility. It would be inappropriate and inefficient to expand the ombudsman mandate to become quasi-regulatory, overlapping with the jurisdiction of administrative agencies that have statutory accountabilities.

Before handing this over to Sarah to discuss how Shaw deals with customer complaints on a day-to-day basis, I'll comment briefly on funding. We continue to believe that companies generating a higher proportion of complaints should shoulder a higher proportion of funding responsibility. For this reason, Shaw has proposed that the CRTC should increase the complaint-based portion of the annual fee.

This approach has two benefits. The costs associated with the CCTS would be shared more equally by the service providers that use its resources. And, more importantly, providers would be motivated to increase their quality of customer service to avoid complaints. This is what we should be working towards. The CCTS funding framework should set the right incentives for service providers to make this happen.

This provides a good opportunity to transition to Sarah, who will now speak to how we, at Shaw, continuously build relationships with our customers.

[Sarah]

Thanks, Morgan.

At Shaw, every decision we make, and every initiative we launch, is driven by our customers and the need to provide them with competitive choice and exceptional value. We measure the success of everything we do from the customer's perspective.

We have heard similar statements from other service providers this week. And we know, from competing with several of them, that they also live by these statements.

Customer satisfaction is an integral part of Shaw's operations and culture. It is one of the foundational measures of the success of our company. We realize that a customer who feels heard and valued is more likely to stay with Shaw. This is why we pro-actively reach out to our customers for feedback through our Voice of the Customer surveys. Customers are invited to take part in this survey whenever they interact with Shaw, whether it was a conversation with a contact

centre representative, an in-home visit or an on-line chat – we ask for honest feedback on the experience. This insight brings us closer to our customers and gives us the tools to build the best-in-class experiences that they expect and deserve.

Consistent with our drive for customer satisfaction and engagement, Shaw takes complaints very seriously. Customers can contact us at any time via phone, e-mail, chat, at our retail stores or through our on-line Support forum. We work very hard to ensure any issues are resolved quickly and effectively by empowering our front-line customer-facing employees. However, if that does not happen, we have a comprehensive Customer Advocacy program that includes a dedicated Resolution Team who respond to customers within 24 hours. Through the Advocacy program, customers are also able to raise any concerns or provide feedback to Shaw's Leadership and Executive-level teams.

There is no doubt in our minds that a customer with an unresolved concern will start to look for alternatives. Within our serving area, there is intense competition. Consumers know they have options, and we know they have options.

For us, losing a customer because of an unresolved concern is an outcome we cannot let happen. As a company, we therefore must, and do, work hard to resolve complaints, as well as anticipate and mitigate future concerns. We make sure that any potential learning from an issue gets back to the right groups through a continuous improvement and process re-design framework. This approach is not only necessary for Shaw to remain viable in the market, we view it as one of our competitive advantages. We value our customers' business and we never want them to feel unheard.

[Morgan]

Thanks, Sarah. Finally, we would like to address two additional issues that have been raised in this hearing.

First, in our submissions, we argued that participation should be voluntary. This was based on our belief that service providers could distinguish themselves in a competitive market through CCTS participation. We also believe that the CCTS would be less burdened with ensuring compliance – especially by small service providers. However, we have heard from the CCTS and agree that mandatory participation for all TSPs and TVSPs is reasonable.

Second, we disagree with the suggestion that more needs to be done to “promote” the CCTS. The issue is “awareness” rather than promotion. Any customer who is not able to resolve a complaint with its service provider should be made aware of the option to make a complaint to the CCTS. Existing tools are sufficient – including CCTS descriptions on company websites, customer bill messages and notification at the second level of escalation.

Additional promotional measures will lead to customer confusion and an increased likelihood that customers will take their complaint directly to the CCTS rather than first resolving issues with their service provider.

This week we have heard a lot about the value of customer service and timely dispute resolution. We couldn't agree more. You have heard Sarah speak about Shaw's focus on customers and how our customer satisfaction rating is a key metric for success within our business. We also work hard to engage with our customers through our Voice of the Customer and other initiatives.

We firmly believe intense competition in the market drives all service providers to improve customer service. The CCTS was established to provide an alternative avenue for recourse in the rare circumstances when a customer is not able to resolve a complaint directly with its service provider.

We ask that the CRTC continue to ensure that the CCTS provides a complementary function to:

- the role of the market,
- internal responsiveness to customer feedback, and
- the CRTC's regulatory framework.

At Shaw, we will continue to focus on the needs of our customers. This means living out our brand promise that, with Shaw, you won't miss a thing – including the opportunity to be heard.

Thank you, Mr. Chairman and Commissioners, for the opportunity to appear before you today. We welcome any questions you may have.

Shaw Seating Plan

Paul Cowling	Sarah Miller Wright	Morgan Elliott	Dean Shaikh	Esther Snow
VP, Regulatory Affairs	VP, Customer Care	Senior VP Regulatory and Government Relations	VP, Regulatory Affairs	Manager, Regulatory Affairs

CRTC Chairman and Commissioners