

CCTS Analysis of PSP Responses to Public Awareness Survey

Background

In May 2015 CCTS sent a survey to its Participating Service Providers (PSPs). The purpose of the survey was to develop additional information about the extent of PSP compliance with their commitments under CCTS' public awareness plan "Developing Public Awareness of CCTS" ("the Plan"). This information is to be used to inform the discussion of CCTS' "next steps" regarding public awareness.

The survey was sent to the PSP in the language with which we normally communicate with it.

The Survey

CCTS sent 133 surveys to the PSPs. CCTS received just 47 replies, for a **response rate of 35%**.

Our analysis was based only on those 47 replies. Many of the questions did not call for simple "Yes/No" responses. As such, CCTS analyzed the responses and used its best judgment in assessing whether the PSP is compliant with the provision in question.

The survey was broken into five sections, matching the five sections in the Plan:

1. White Pages Message and Text;
2. CCTS Notice and PSP Website Link;
3. Customer Bill Messages;
4. Customer Notification by Service Provider; and
5. Terms of Service.

The following is a section by section report, beginning with a summary of the requirement, followed by CCTS' analysis of the responses and the level of compliance.

1. White Pages Message and Text

The Plan requires any PSP that publishes a "white pages" directory to include a notice about CCTS, using specified text.

8 of 47 respondents report that they publish a directory, and 6 of those 8 report that their directory contains the CCTS notice, and the text matches the text set out in the Plan.

This is a **reported compliance rate of 75% of respondents**.

2. CCTS Notice and PSP Web Site Link

a. The Plan requires every PSP to have a page on its web site that contains a notice about CCTS and provides a link to the CCTS web site.

CCTS is able to test-check the PSP responses against their web sites and determined that 38 of 47 respondents have web sites that contain the required notice and link, and that the text of the notice is as required. This is a **compliance rate of 81% of respondents**.

b. The Plan also requires that if a PSP's web site has a search function, seven prescribed terms ("complaint", "dispute", "agency", "CRTC", "CCTS", "commission" and "ombudsman") should return a link to the page with the CCTS notice and web site link.

30 PSPs report that their web sites features a search function, however, our analysis revealed that only 26 of respondent PSP web sites actually have a search function. Only 2/26 were actually fully compliant (i.e. all seven search terms returned the CCTS web page). This is a **compliance rate of 8% of respondents**.

Our analysis reveals that 31% of respondents (8) search functions did not return a link to the CCTS page for any of these terms. The remaining 61% returned a link for somewhere between 1 and 6 search terms.

3. Customer Bill Messages

a. The Plan calls for PSPs to place a message about CCTS on customer invoices at least four times per year, in prescribed language, in a reasonably prominent location.

31 of 47 of respondents self-report that they are compliant with this requirement, a **compliance rate of 66% of respondents**.

b. The Plan also requires that PSPs which have customers who do not receive a monthly bill (e.g. pre-paid wireless customers) put in place a process for delivering a similar message to those customers.

27 of the 47 respondents reported that they have no such customers. For the remaining 20 PSPs, only 7 reported that they have such a process in place. This is a **compliance rate of 35% of respondents**.

c. In TRP 2011-46, the CRTC also directed TSPs that as they modify their billing systems over time, they should include a permanent and prominent location in the bill for a standard CCTS notice each month. We incorporated this into the Plan.

13 of the 47 respondents report that they have modified their billing systems. Of these, only 7 report that they have incorporated the monthly messaging requirement. However, CCTS' analysis reveals that 2 of the 7 PSPs which reported compliance with this obligation are actually not compliant. This is a **compliance rate of 38% of respondents.**

4. Customer Notification by Service Providers

CCTS has no real ability to monitor PSP compliance with this provision of the Plan. Nonetheless it is possibly the single most important feature of the Plan, and the most effective way to achieve the Plan objective – i.e. that when customers have an unresolved complaint, it should be easy for them to find out about CCTS. When CCTS was discussing amendments to the Plan with the PSPs, it was also by far the most vigorously opposed.

The Plan requires PSPs to inform customers who cannot resolve their complaints directly with the PSP about their right of recourse to CCTS. In the event of an unresolved complaint, the Plan requires PSPs to inform customers about CCTS upon a failure to resolve the complaint no later than the “second level of escalation”. PSPs with only one level of escalation would provide the notification at that stage. PSPs with no escalation process would notify customers at the front line.

After analyzing the responses, our assessment is that 15/47 report a notification process that appears to be compliant with the Plan based on our limited analysis. **This is a compliance rate of 32% of respondents.**

These questions also allowed us to gather some data on the number of levels in the PSPs' internal complaint-handling processes. Of the 47 respondents we found:

PSPs with 4 or more levels of escalation:	12
PSPs with 3 levels	16
PSPs with 2 levels	14
PSPs with 1 level	0
Unknown	5

5. Terms of Service

The Plan gives PSPs the option of referencing the availability of CCTS for the resolution of disputes between customers and the service provider. It is not mandatory.

13 of 47 PSPs reported that they reference CCTS in their Terms of Service.