

**Before the Canadian Radio-television and
Telecommunications Commission**

**Broadcasting and Telecom Notice of
Consultation CRTC 2015-239**

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

Final Written Comments

of

CCTS

20 November 2015

Introduction

1. CCTS is pleased to provide its final submission in the Commission's proceeding initiated to review its structure and mandate – Broadcasting and Telecommunications Notice of Consultation CRTC 2015-239 (NC 2015-239).
2. All parties agree that CCTS plays an important role.¹ Since inception, CCTS has effectively and efficiently resolved 53,000 complaints and also plays an important educational and informational role for customers². In 2014-15, CCTS helped to resolve 87% of all complaints to the mutual satisfaction of both the customer and the service provider. According to its in-house survey of customers that have completed the CCTS process, customers are pleased with the services that CCTS provides, with overall satisfaction at close to 90%.
3. Service providers have also expressed support for CCTS and are generally very satisfied with CCTS' services and process. In fact many service providers cited CCTS as the impetus for their increased focus on customer service.³
4. CCTS will limit its final written comments to matters surrounding its governance and funding, mandate, public awareness, participation and enforcement and compliance. With respect to other issues raised in this proceeding, CCTS relies on the arguments made in all its submissions in this proceeding. The fact that certain issues are not addressed is not intended to diminish the significance of these issues nor does it signal a change to CCTS' stated position.

Governance

5. There have been a variety of opinions expressed by intervenors in this proceeding related to CCTS governance and voting structure. Generally, consumer groups suggest that changes need to be made to ensure the independence and adequate funding of CCTS.⁴ Intervenors representing the industry generally feel that the current governance and voting structure is adequate and that no changes should be made.
6. As indicated in CCTS' oral presentation⁵, the voting structure has been the subject of some debate among Board members. For Industry Directors these voting thresholds represent essential protections. Among the other Directors, from the very beginning of the organization, some have believed that they should be eliminated, and some have merely hoped to limit the number of issues to which they apply. Attempts were made but no agreement could be reached on decision-making

¹ See for example TELUS transcript V1, para 988-89/1012-13; NPF-COSCO-PIAC transcript V1, para 682-683; l'Union des consommateurs transcript V2, para 2126; Rogers transcript V2, para 1778; Shaw transcript V3, para 2126.

² CCTS, transcript V1, para 338-344, 653-655.

³ NC 2015-239, Bell Canada Intervention 25 Aug 2015, para 2, 6-9.

⁴ See for example NPF-COSCO-PIAC transcript V1, paras 728-734.

⁵ CCTS transcript V1, para 439-450, 476 and transcript V4, para 4479-80.

processes different from those currently included in our constating documents. No bridging of the differences seems possible and therefore no solution can be found within the Board itself.

Funding

7. With regard to the funding formula, in CCTS' view, it must meet two important objectives: it should adequately provide for the security of CCTS' funding needs, including on-going cash flow requirements, and it should be as simple as possible to administer. CCTS encourages the Commission to outline the policy objectives it wishes to see addressed by the funding formula, if any, and allow CCTS and Participating Service Providers (PSPs) (through the Members) to determine what funding formula best meets those objectives.
8. In response to an undertaking, CNOC describes the changes it is proposing to the funding formula. In particular, CNOC is proposing that the manner in which the complaint-based fee (CBF) portion of funding is calculated and billed be changed such that "variable per complaint-based fees billed after-the-fact on a quarterly basis that are based on the stage of the process where a complaint is resolved would be removed."⁶
9. The funding formula was designed to accomplish a variety of specific objectives. The CBF in particular, which contains a series of escalating price levels, was designed to achieve two main objectives: i) incent early resolution of complaints and ii) to compensate CCTS for the additional resources required to deal with the complaint as it proceeds through the CCTS process. CNOC's proposal removes the incentive for PSPs to resolve complaints at an early stage. This is not consumer friendly and would lead to a decline in the proportion of complaints that are resolved at an early stage in CCTS' process. As a result, a higher proportion of complaints would require investigation. This would require CCTS to add extra complaint-handling employees at a more senior level than is required under the current model, increasing CCTS' cost of operation. This would not be in the public interest.
10. The funding formula contains numerous "moving parts", which have been put in place to accomplish specific objectives.⁷ CNOC's proposal addresses only one of those moving parts, without consideration for the objective of that "moving part" or the consequences of the change. For this reason, CCTS believes that any changes to the funding formula must be considered in the context of a review of the formula as a whole, and this is best accomplished by CCTS and its Members under the relevant provisions of the Participation Agreement.
11. Finally, the level of funding provided must be sufficient to allow CCTS to fulfil its core mandate in an independent, timely and professional manner. Should the Commission decide to expand CCTS' mandate or to otherwise accept some of the proposals from intervenors seeking to add initiatives to

⁶ Paragraph 11, CNOC letter dated 12 Nov 2015 in response to Undertaking at transcript V2, para 2760-2772.

⁷ NC 2015-239, CCTS initial Comments 25 Aug 2015 para 45.

its mandate, CCTS' operating costs will increase. Any additional initiatives will need sufficient funding to ensure that they do not interfere with CCTS' ability to perform its core mandate.

Mandate

12. The ombudsman role played by CCTS and the services it provides to consumers and small business customers has been lauded by virtually all intervenors.⁸ In keeping with the government's vision, CCTS provides independent, impartial, timely, efficient, and informal resolution of complaints and this concentrated focus is a large part of why it has been so successful.
13. As detailed in Appendix 1 to this submission, parties to this proceeding are calling for, in some cases, major additions to CCTS' mandate and/or responsibilities. CCTS cautions against any expansion in mandate or significant additions thereto. Also, the sheer number of requests is staggering and because of this, CCTS' ability to obtain funding and implement for all of them is questionable.

Consumer Advocacy, including matters pertaining to Accessibility

14. Impartiality and independence are critical pieces of an ombudsman role and all aspects of CCTS' structure and processes are currently designed to ensure this impartiality and independence.
15. CCTS is sensitive to the unique needs of consumers with accessibility issues. CCTS provides service in a manner that accommodates the needs of persons with disabilities and reflects the principles of independence, dignity, integration and equality of opportunity. Under its current mandate to resolve complaints and administer codes of conduct, CCTS employees assist persons with disabilities to make complaints when required. In analyzing complaints from customers with accessibility issues, CCTS applies the same standard of review as any other complaint. Where there are industry standards that have unique application to persons with disabilities, like the requirement to provide copies of documents in alternative formats or extended trial periods under The Wireless Code (TWC), CCTS ensures that these consumers get the benefit of these provisions.
16. However, expanding CCTS' mandate to include matters relating to accessibility per se, such as those proposed by parties in this proceeding and summarized under the heading "Accessibility" in Appendix 1, would transform it from a dispute resolution body to a consumer advocate. It would not align with the core principles of impartiality and independence inherent in ombudsman work. It would also harm CCTS' credibility with service providers, making it harder to maintain a cooperative relationship, which would detract from CCTS' ability to quickly and effectively resolve customer complaints.

⁸ See for example TELUS transcript V1, para 988-89/1012-13; NPF-COSCO-PIAC transcript V1, para 682-683; l'Union des consommateurs transcript V2, para 2126; Rogers transcript V2, para 1778; Shaw transcript V3, para 2126.

Internal PSP Processes and General Operating Practices

17. Expanding CCTS' mandate to include complaints about the reasonableness of PSPs' internal processes and general operating practices, as has been suggested by some parties⁹, would also dramatically change the nature of CCTS from an independent ombudsman to that of policy-maker. Currently, when resolving consumer complaints, CCTS' standard of review¹⁰ requires CCTS to consider whether the PSP reasonably performed its obligations pursuant to the contract with the customer and whether it has reasonably followed its own internal policy and processes in its interactions with its customer.
18. The reasonableness of internal policies and practices is best addressed by a competitive marketplace. If the market is not functioning competitively, other agencies like the Commission, the Competition Bureau, consumer protection agencies or the Privacy Commissioner are authorized to and fully capable of addressing these issues, and have the expertise to do so.

Customer Service Complaints

19. Similarly, CCTS should not be mandated to accept complaints relating to the quality of customer service. Currently there is no framework for determining appropriate standards of customer service and therefore there is no yardstick against which CCTS would be able to measure PSP conduct.
20. Poor customer service is also best addressed through the competitive market, where service quality is a competitive differentiator and dissatisfied customers can switch providers without obstacles in keeping with the Commission's regulatory policy.

Disputes relating to Wholesale Services

21. One party to this proceeding has requested that CCTS' mandate be expanded so that during the course of investigating retail consumer complaints, it also investigates and reports on whether such complaints were caused by the action of an underlying wholesale service provider.¹¹
22. CCTS was created to resolve retail consumer and small business customer complaints. It was never envisioned that this would include handling complaints about wholesale services or assisting in mediating disputes between wholesale providers and resellers of those services.
23. Essential wholesale services are regulated and are rightfully under the purview of the CRTC which has the tools and the authority to resolve disputes between retail and wholesale providers.

⁹ See for example, CIPPIC transcript V3, para 4394-4395.

¹⁰ Procedural Code, section 4

¹¹ TekSavvy transcript V3, para 3656-65.

Research and Publications

24. Expanding CCTS' mandate to require it to engage in broad research activity and to regularly publish such research, as has been suggested by some intervenors¹², is not appropriate. CCTS is not equipped or funded to conduct this type of activity, and it is not in keeping with the original vision for the organization. Mandating CCTS to do so will transform it into a public policy research body, diverting its focus from complaint resolution and code administration.

Transparency

25. CCTS fully understands the need for transparency as this is a fundamental element in any ombudsman's work¹³. To this end, the CCTS Annual and Mid-Year reports contain detailed statistics and information about complaint trends and issues it sees. CCTS is currently working on developing additional information and case studies which it envisions publishing on its website. And, as indicated in this proceeding, CCTS plans to continue publishing the results of its in-house customer satisfaction survey, including questions about how customers heard about CCTS. Also, this year CCTS will conduct a poll to establish the baseline level of awareness of CCTS and will report on these findings.
26. With regard to code administration, an annotated version of the Wireless Code will also be published to ensure broad and common understanding of how specific requirements of the Code applied to the specific fact situations that were raised in the complaints it has investigated.
27. When a complaint cannot be resolved and CCTS believes that the service provider did not reasonably fulfill its obligations toward its customer, it may at times be required to issue a Decision. In these cases, the full Decisions are published on the CCTS website.
28. Some parties to this proceeding¹⁴ have requested that CCTS provide the raw data relating to its complaints and customer satisfaction survey. Although CCTS understands the need for transparency, it cautions against any requirement for CCTS to release raw data. In these instances the information provides no useful insight but consumes time and effort both in its collection, analysis and dissemination, and in the subsequent need to contextualize and explain the raw data so that it is not misunderstood or misused.

Public Awareness

29. CCTS' strategy is to make sure that it is easily accessible to customers that need its services, when they need those services. It is CCTS' strongly-held position that this is the most effective public awareness strategy for an industry ombudsman. Most parties agree that a focussed, as opposed to general awareness strategy, is more effective.¹⁵

¹² See for example, NPF-COSCO-PIAC transcript V1, para 740/ 913-17.

¹³ CCTS transcript V1, para 480-82.

¹⁴ NPF-COSCO-PIAC transcript V1, para 973-976.

¹⁵ See for example, TELUS transcript V1 para 1076-7; Consumers Council of Canada transcript V1, para 1456-61; FRPC transcript V3 para 3037-40; Bell Canada transcript V4, para 4039-44.

30. Although CCTS does indeed try to become better known generally through public reporting and by working with the media, its focus has not been on promoting “general awareness” of CCTS as it does not believe that such a strategy would be effective, in particular given that the cost of general awareness activities can be substantial. The reality for a not-for-profit organization is that funding is not unlimited.
31. The CCTS public awareness plan¹⁶ contains a number of requirements aimed at ensuring targeted awareness among PSP customers who have complaints, when they have complaints. For example, PSPs are required to notify customers on their websites about their internal complaint-handling processes, and about the right of recourse to CCTS, and this notice must be at a location where a customer might reasonably expect to find information about how to make a complaint.
32. The Plan also includes a number of measures that raise awareness of CCTS for a demographic that is less inclined to use the internet as a chief source of information. These measures include a message on customer invoices that appear, at minimum, four times per year. CCTS can attest to the effectiveness of this measure by the marked increase in call volumes when larger PSPs print this message. PSPs are also required to inform customers of their right of recourse to CCTS after the second level of escalation within their internal process has failed to yield a resolution. Finally, those PSPs that print white page directories are also required to print a message about CCTS, including how to contact it to make a complaint.
33. Throughout this proceeding CCTS has pointed to the crucial role PSPs play in increasing public awareness.¹⁷ CCTS’ Plan requires PSPs to engage in a number of specific customer awareness raising activities. The feedback provided by the 35% of PSPs that chose to respond to the CCTS survey measuring compliance with the Plan (conducted in May 2015) indicates that not one of the five elements of the Plan has been fully met by all PSPs. In CCTS’ respectful view, it is not efficient or effective to consider expanding the current public awareness plan requirements until CCTS can first obtain from PSPs a high degree of compliance with the requirements under the current plan so that its effectiveness can be more accurately measured. As CCTS has previously discussed (and will elaborate on below), it seeks the Commission’s assistance in obtaining full compliance in this and other respects.

Participation

34. CCTS understands and respects the fact that the requirement to participate in CCTS and the “trigger” mechanism to effect this participation is a matter of public policy to be determined by the Commission. CCTS hopes that its experience with the current regime, particularly the trigger mechanism, will serve to assist the Commission in making its decision on how to balance the desire to provide consumers with recourse to CCTS against the practical challenges involved in requiring broader participation and the negative impact the trigger mechanism seems to have on consumers.

¹⁶ CCTS(CRTC)5Jun15 -3 NC 2015-239. Attachment 22

¹⁷ CCTS Initial Comments 25 Aug 15, para 22; transcript V1, para 50, transcript V4, para 4486-92.

35. As indicated in its Oral Comments, in the last two years only one PSP has managed to sign-up to CCTS within the requisite 5 days. On average, it takes about 50 days, with the mean time from the triggering of the participation requirement to participation being 73 days.¹⁸ It is important to remember that these delays relate only to those PSPs that CCTS was actually successful in signing up. Many PSPs refuse to sign-up and are referred to the CRTC.
36. It is important to remember that this process is triggered by customers with unresolved complaints. These customers have already tried resolve their disputes directly with their service providers but were unsuccessful. Some likely escalated their complaints internally with the provider, potentially going through a number of levels of escalation before approaching CCTS. Once they do contact CCTS, the mean time before the CCTS complaint resolution process can begin is an additional 73 days. And once the process begins, the first step is to send the complaint back to the PSP which has 30 days to try to resolve it again before CCTS proceeds to investigate it. The trigger mechanism itself negatively impacts consumers. When it is analyzed in the overall context of the complaint-handling process, both internally with the service provider and at CCTS, the amount of time a consumer is expected to wait before the process can even begin, or before an unresolved complaint is investigated, is unacceptably high.
37. CCTS therefore requests a CRTC registration process that will greatly simplify the “sign-up” of PSPs that are mandated to participate. The process could be initiated by a decision in this proceeding which would i) define the TSP and TVSP eligibility criteria for participation in CCTS, ii) direct all eligible service providers to register via a written letter sent to the Commission by a clearly identified deadline, iii) clearly indicate that CCTS will then reach out to the PSP to complete the sign-up, which the PSP is required to do within 30 days’ of CCTS having reached out to it and that iv) these requirements are a mandatory aspect of operation with operational and/or punitive consequences for service providers that fail to comply with any aspect.
38. When registering with the CRTC, PSPs should include all sign-up information required by the CCTS, including:
 - a. the name and contact information of a senior representative of the organization that has the authority to execute the documents required to affect participation;
 - b. the legal entity name of the PSP as well as all brand names under which it provides service; and
 - c. a list of the services that the PSP, including its related brands, provides (i.e. wireless, internet, phone, tv, long-distance)
39. From these registration letters the CRTC can establish a list of the TSPs and TVSPs that meet the CRTC-established eligibility requirements and that are mandated to participate in CCTS. It could then provide this list to CCTS which will proceed to administer the “sign-up” process.

¹⁸ CCTS transcript V4, para 4497.

40. One of the factors that greatly contributes to the overall delay in signing up PSPs is waiting for them to return to us the required documentation, in particular the certification of retail revenue form. In fact, many providers ask us why they need to provide this information to us since the CRTC already has it and question why we can't simply use that information. We believe strongly that having the Commission annually disclose in confidence to CCTS the revenues of each PSP for collection of fees will reduce the amount of time required to sign up PSPs and make the sign-up process more efficient for both CCTS and PSPs.
41. During the oral hearing the Commission asked a number of parties this question: if the trigger mechanism is kept and CCTS receives a complaint about TV services regarding a provider that also offers telecom services, would the TVSP be required to participate in CCTS only with regard to its TV services? Alternatively, would it also be required to participate with regard to any in-scope telecom services it may offer?
42. Currently, as it relates to telecom services, if CCTS is required to sign up a TSP subsequent to the receipt of, say, an internet complaint but that TSP also provides phone service, CCTS may subsequently accept any in-scope complaint pertaining to that TSP, including phone service, not just complaints relating to the line of business in which the "triggering" complaint was received (in this example, internet service). CCTS envisions treating the sign-up of TVSPs in the same manner. Although there seemed to be no confusion about this on the part of PSPs, CCTS wanted to take this opportunity to clarify its position.¹⁹

Compliance and Enforcement

43. In order for CCTS to effectively and efficiently serve all consumers and small business customers, eligible PSPs must "sign-up" and then fully comply with all required aspects of the CCTS Participation Agreement. The submissions of CCTS in this proceeding demonstrate that this is not currently happening²⁰.
44. CCTS has encountered ongoing compliance issues in all of the fundamental areas of participation: fee payment, certification of revenues, "sign-up", the public awareness plan, and compliance with the Procedural Code, regarding the implementation of complaint dispositions.
45. All stakeholders, including consumer groups, groups representing persons with accessibility issues, industry groups and service providers, believe that the Commission should assist CCTS with the enforcement of these obligations, and establish a process that enables CCTS to refer to the Commission situations in which PSPs do not adhere to those obligations²¹.
46. CCTS is therefore asking for the Commission's assistance in ensuring compliance with its regulatory policies, specifically those surrounding participation (sign-up) requirements and the certification of

¹⁹ See for example TekSavvy transcript V3, para 3688

²⁰ See CCTS transcripts V4, para 4530-36 and the attachment to CCTS' oral reply comments of 6 Nov 2015 for a summary of the areas of non-compliance.

²¹ See for example NPF-COSCO-PIAC transcript V1, para 720-24/957-59; TELUS transcript V1, para 1164-72; Bell Canada transcripts V4 para 4086-90.

revenues as well as certain obligations stemming from the CCTS participation agreement, such as fee payment and the requirements under the public awareness plan.

47. CCTS believes that an unequivocal directive outlining the requirement to comply with all aspects of the Participation Agreement and related Commission determinations is necessary.
48. CCTS is also proposing that the Commission establish an annual process by which an officer of each PSP certifies to the CRTC that the PSP is fully compliant with all aspects of the CCTS Participation Agreement. This process would include annual spot checks and real consequences for any PSP found to be non-compliant.
49. There should also be a process for CCTS to refer to the Commission significant incidents of non-compliance so that the Commission may act to enforce its regulatory requirement that PSPs fully participate in CCTS.
50. It is important to note that CCTS does not envision referring matters of non-compliance to the Commission immediately upon a PSP becoming non-compliant. CCTS would continue to attempt to obtain compliance by working directly with the PSP and only in the cases of significant non-compliance would CCTS refer the matter to the CRTC. For example, CCTS does not envision referring a PSP that did not pay its fees to the CRTC immediately upon default but only after the PSP has been in default for a number of months and CCTS' collection efforts have not been successful.
51. Partnership between CCTS and the Commission is required to ensure that all PSPs required to participate in CCTS do so without delay and that they implement all requirements of participation. Such a partnership to administer and enforce compliance with the obligations of participation in CCTS will send a strong message to service providers and consumers that CCTS is an effective dispute-resolution agency.

Conclusion

52. CCTS is pleased to have participated in this proceeding and trusts that the information it provided and the views it expressed will help the Commission make its determinations.

Appendix 1 - Summary of Requests by Intervenors for Additions to CCTS Mandate

Complaint Auditing

- CCTS should annually do a random sample survey of complaints that TSPs/TVSPs have objected to, and determine if these are out of scope and if changes need to be made to the complaint-handling process (Bell Canada)

Complaint Tracking and Reporting

- Review and change tracking so that certain complaints are not included in the tally of complaints by service provider. These include complaints that are subsequently withdrawn by the customer as well as certain complaints that CCTS has accepted and investigated but subsequently found to be without merit or otherwise closed. (Bell Canada)
- If PSPs successfully resolve a complaint within the first five days' following CCTS having accepted it, the complaint should not be reported/counted or billed to the PSP. (Sasktel)

Website and Online Presence

- CCTS should use analytics and search engine optimization to get a better understanding of how customers are using its website and to ensure that CCTS is ranked highly on searches. (Bell Canada)
- CCTS could educate customers on certain hot button issues through its website (TELUS)

Public Awareness

- CCTS should promote itself by participating in consumer forums, blogs etc. (Bell Canada)
- Popularity of social media should be exploited by CCTS and fully integrated into outreach - try to increase and incorporate measure of followers, friend, likes on Twitter and Facebook. (Quebecor)
- CCTS and a diverse group of stakeholders should conduct 3 comprehensive surveys to measure level of awareness of CCTS and how customers have learned about it (Consumer Council of Canada)
- Improvements to CCTS website should be made to ensure it is compatible with smart devices (Consumer Council of Canada)
- CCTS should use a responsive web-design as opposed to an app accessible on mobile devices. (Consumer Council of Canada)
- CCTS needs to use data analytics and SEO for titles displayed in search results. (Consumer Council of Canada)
- CCTS should use ad campaigns, news media outreach, participation in complaints forums and google AdWords to raise awareness. (Consumer Council of Canada)
- Success of public awareness initiatives should be measured through a well-designed survey before and after these initiatives go into effect. (FRPC)
- CCTS should have a marketing and communications budget for multiple language promotional material, a consumer outreach program and report of newsworthy results in a timely fashion. (PIAC et al)

- Commission should direct the CCTS to allocate funding to regular public awareness measurement and reporting. (PIAC et al)
- CCTS should have a research budget to survey and report on the effectiveness of public awareness measures. (PIAC et al)

In-House Customer Satisfaction Survey

- Survey information should be made available on the public record – e.g. who administered survey, statistical data, etc. (TELUS)
- CCTS should report how customers found out about it in its Annual Report as it did in 2013-14 (Shaw)
- There is a need for CCTS and an independent stakeholder panel to separately survey customers of telephone services, wireless services and Internet services to determine whether any of these have unresolved complaints. (Consumer Council of Canada)
- Survey requires additional questions to ascertain if customers understand the outcome of their complaint and agree with CCTS' approach to resolution. (FRPC)
- Survey information should be more transparent. Information about how and when the customer learned about CCTS should be reported. (PIAC et al)

Transparency relating to Decisions, Code interpretations and Operations

- Interpretations of TWC or TVSP Code should be made public to provide a foundation for challenges in the future. (Rogers, CIPPIC)
- CCTS should publish complaint Decisions in an accessible format that follows a well-defined schema so other parties, such as CanLII, can include these in their databases. (TekSavvy)
- There should be more transparency in reporting and budget. (PIAC et al)
- CCTS should publish an ombudsman report. (PIAC et al)
- CCTS should disclose other pertinent information, such as how a decision was reached, the CCTS objectives when treating a complaint, the relationship between the amount asked and provided, whether the PSP adhered to CCTS directives, etc. (l'union des consommateurs)
- CCTS should produce an ombudsman report like the TIO or Belgium ombudsman. (l'union des consommateurs)
- Annual and other reports should include more detailed metrics and strategies for improvement. (PIAC et al)

PSP Survey

- CCTS should implement a PSP survey to ask for industry views about the process. (Shaw)

Expansion of Mandate

- CCTS Procedural Code should be modified to allow it to accept complaints that involve wholesale third-party delivered services. In the event the complaint was caused as a consequence of third-party failure then CCTS should report this to the CRTC. (TekSavvy)
- CCTS reports should be reviewed to see if there is a need to expand scope based on type of complaints received. (TekSavvy)

- CCTS should be given jurisdiction to compel third-party PSPs to provide information relevant to the complaint. (TekSavvy)
- Regulated services and list of services in section 3 of Procedural Code should be added to CCTS mandate. (CIPPIC)
- CCTS should be able to prohibit conduct that is unfair and/or harmful to customers. (CIPPIC)
- There should be a code for internet and telephone services and if not, CCTS should be able to mandate similar fair practices for those services. (CIPPIC)
- Customers and service providers would benefit if CCTS were a communications ombudsman and not a dispute resolution entity. (FRPC)

Accessibility

- CCTS should ensure that its on-line complaint form is easily accessible. (CNIB)
- CCTS should report on complaints regarding accessibility issues. (CNIB)
- CCTS should ensure the availability of accessible billing and set-top boxes for persons with accessibility issues. (CNIB)
- CCTS website and complaints intake process could be improved by increasing accessibility to its services by providing key information in multiple languages. (PIAC et al)

Compliance and Enforcement

- CCTS should be responsible for monitoring and reporting on leading non-compliance issues and the Commission would be charged with addressing that non-compliance. (PIAC et al)

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