

CONSUMERS COUNCIL OF CANADA

Before the Canadian Radio-television and
Telecommunications Commission

Broadcasting and Telecom Notice of Consultation
CRTC 2018-246

Report regarding the retail sales practices of
Canada's large telecommunications carriers

Intervention

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I EXECUTIVE SUMMARY

- ES 1 Through a questionnaire to the Consumer Council of Canada's Public Interest Network we solicited experiences and views on questions set out by the Commission regarding misleading and aggressive retail sales practices of Canada's large telecommunications carriers.
- ES 2 We summarize and detail verbatim responses from the 42 respondents to the questionnaire.
- ES 3 Respondents in general did not consider plain language to be common to encounters they have with service providers, either on paper, at the door, in person or on the phone. Examples provided were more in the negative than in the positive.
- ES 4 Respondents had a considerable number of detailed experiences they considered to be misleading or aggressive sales practices.
- ES 5 Respondents largely saw the practice of bundling in a negative light, finding it either restrictive or confusing, and in some cases both.
- ES 6 Respondents largely see a lack of competition, a lack of effective enforcement and fines, a lack of an appropriate Ombudsperson, and a lack of clarity in offerings and contracts as causes or gaps.
- ES 7 Many respondents believe that consumers, and consumer groups and other relevant significant stakeholders should be consulted earlier in processes regarding the sales practices of Canada's large telecommunications carriers.
- ES 8 Respondents suggested an increase in competition, more effective policing of misleading advertising, the application of significant fines and penalties for non-compliance, greater awareness by consumers and better and more consistent disclosure by service providers as key to helping resolving such malpractices.
- ES 9 Many respondents noted or referred to an anti-consumer corporate sales and profit culture that drives these practices. Respondents want to see it addressed.

II INTRODUCTION

1 The Governor in Council issued Order in Council P.C. 2018-0685 (the OIC), dated 6 June 2018 noting that Canada's large telecommunications carriers offer their telecommunications services for sale through various persons, including their employees and third parties. It noted that Canadians have expressed substantial concern regarding the practices used by those persons when offering the telecommunications services of those carriers for sale. It also noted that there have been reports that those persons sometimes use misleading or aggressive sales practices, which can cause stress, confusion, and frustration, and can lead to the price paid by Canadians for telecommunications services being sometimes unfair, unpredictable, or higher than they expected. The OIC further noted that vulnerable Canadians, such as those who are vulnerable due to their age, a disability, inexperience with Canada's sales culture or complex multi-jurisdictional consumer protection regime, or a language barrier, are more likely to be impacted by those practices. In the Governor in Council's view, Canadians deserve a competitive marketplace where consumers are treated fairly.

2 This submission by the Consumers Council of Canada ("the Council"), a not-for-profit organization that supports the protection and strengthening of consumers' rights, submits its intervention to this proceeding. The Council works towards an improved marketplace for Canadian consumers, and focuses its advocacy on the rights and responsibilities of consumers.

3 The Council is one of a very small number of national consumer groups, familiar with involvement in such CRTC consultations and hearings, and an indirect stakeholder in the CCTS through its eligibility to vote for the two consumer representatives on the CCTS's Board of Directors. It has a clear interest in the reduction of misleading and aggressive sales practices, as they have perennially been a significant source of complaints from consumers about large telecommunications carriers (service providers), which often are ignored and/or not remedied.

A CCC Primary Focuses in this Submission of Intervention document

4 The Council finds that all questions posed by the CRTC in its Notice of Consultation are important ones and require thoughtful objective discussion and demand answers. The Council will confine its responses in this Intervention document primarily to those relating to the following questions the Commission

proffered, and in some instances expanding and offering initial suggestions for correction, remedy or improvement:

- Do you think your service provider is using language that is easy to understand?
- Have you experienced misleading or aggressive sales practices from a service provider?
- As a person with a disability, did you find that your service provider accommodated your needs during sales interaction?
- As an older Canadian or a Canadian with a language barrier, did you find that the service provider made an effort to make sure that you were able to make an informed decision about the services offered for sale?
- In your opinion, are existing consumer protections sufficient to ensure that you are treated fairly regarding retail sales practices?

5 It is these questions that formed the basis of our questionnaire soliciting views for this intervention.

B *CCC Questionnaire to our Public Interest Network*

6 More than 350 consumer opinion leaders and interested parties participate in the Council's Public Interest Network (PIN). These are people who make themselves available to offer their thoughts about consumer issues. The PIN acts as a touchstone for the Council's advocacy. It is available to help the Board of Directors establish its annual priorities and provides Council researchers consumer perspectives of specific consumer issues.

7 The Council sent an online questionnaire to the PIN membership. The Council received 42 responses to the 380 questionnaires sent out - an 11% response rate. All 12 questions were open-ended, as the Council sought qualitative responses regarding PIN members' experiences, issue identification, insights and recommendations, with a lesser focus on quantitative or statistical outcomes. The Council does not suggest that the responses are necessarily representative of the Canadian population or any specific demographic group. It does know that the responses are commonly carefully considered and come from individuals with an interest or stake in the issues queried, including general consumer protection.

8 Responses to this survey have been included with this submission of intervention, both summarized and verbatim.

III PLAIN LANGUAGE

9 In our CCC questionnaire to the Public Interest Network (PIN) we asked:

- In your interaction with a service provider, do you think the service provider used plain language that was easy to understand?
- Ideally telecommunications service providers should be using plain language in dealing with their customers. Do you have examples where this has not been the case? If so, please explain.

10 There were few positive responses regarding the prevalence of plain language.

11 There were few specific Canadian examples of good plain language, literally only a handful. Of those, perhaps ironically, only one was detailed adequately to provide valid information, and a second that provides clarity only regarding which service provider and services, but nothing further. Verbatim responses included:

"Rogers actually is pretty good with their communication on their billing now. When I took their Home security service they've been very clear about the charges and promotion end date on all their bills. So when time came for renewal I knew exactly when to call them and make changes. They were super accommodating too!"

"Primus bundled phone and Internet seems clear and straight-forward. We've gone to them for non-mobile needs."

12 Many respondents suggested that other countries or jurisdictions can provide examples of appropriate direction. Verbatim responses included:

"Look at other countries where everything has to be disclosed, service fees, taxes, etc. so the bottom line quoted price is the quoted price. No-one likes surprises when all of sudden they are billed \$150 for installation."

"The best Telcom experience I have had over a long lifetime, as a contractor in the building trade, consumer, and "snowbird" (4 decades), is with Verizon in the U.S. as a landline customer. Their service, like Amazon, was beyond expectations! Several decades past, I had billing issue with Verizon, on the phone call the agent apologized for error and said without hesitation, you will be credited \$25 for your trouble, now what is the error? After selling out the landline business in Hawaii, Verizon sent me a check for another \$25, 6 months later, thanking me for my personal home landline business. The U.S. may be a dysfunctional society, some world organizations do not consider to be a democracy any longer, but there are some well run multi-national corporations emanating from there."

"In some parts of the world and the U.S., where I spend 6 months each year, there is legislation forbidding the use of legalese, dictating plain language use."

- 13 Interestingly, several comments were bordering on sardonic, indicating perhaps a view that there is little chance of ever getting such plain language from service providers. Verbatim responses included:

"Hmm. I wish I could remember where but I did encounter a really well written plain language agreement once."

"Sorry I never had the luxury of that happening."

"The language was plain. The price was confusing."

- 14 The majority of detailed responses were negative indicating language issues, fine print, confusing and difference between plain language on phone and final legal contract. One noted that they relied on recordings they made of calls with their service provider to ensure that they got what they were promised. A significant level of frustration is evident in many responses. Verbatim responses included:

"Bell promises 79.90 month and 300 dollars installation fee plus 5 dollar PVR rental . Regular prices will apply for services delivered prior to the 1st full 30-day billing period or if Bell terminates your services during a 30-day billing period. Wow."

"My main issue involves the person I am dealing with. At times, I'm not able to understand their accent, creating embarrassment for me as I try to understand, and frustration for the sales person that I'm talking to because they often think that they are speaking English clearly."

"Cannot understand the staff on the phone because of their poor understanding of English."

"I have a problem understanding foreign sales people or techs."

"The protection insurance on my mobile phone through Bell. I paid an additional \$10 per month for insurance in case of 'any/all damages'. Upon cracking my screen, Bell offered to send my phone in for repair. They wouldn't repair it or offer a loaner phone as I had chosen the insurance plan provided by the phone manufacturers. I had no idea this would be the case - and was without a phone for nearly 6 weeks. I also found out later that insurance on phones should only be taken out at the beginning of the contract, and cancelled after a few months once the phone value goes down & you've paid off the lion's share of the contract. Otherwise you're paying for nothing. Another example = Wind Mobile. Plan = unlimited Wi-Fi (tied to a USB drive hotspot) for \$55 (approx.) Monthly. After about a week, it crawled down to a speed where it would take over a minute to load a page. I took the USB into Wind mobile, where they matter of

factly informed me that I'd used up my "unlimited" amount of data for the month. See; 'Unlimited Data' was the NAME of the plan. Not the ACTUAL amount of data. At no time was this discussed."

"I tried to get a clear explanation of Fibe TV from Bell and was unable."

"The whole topic of data usage is difficult for me to understand and value."

"I have had to rely on the recorded conversations in trying to get Bell to uphold their end of the agreement. With the lack of competitors in my market, I am left with both Rogers and Bell to choose from. Both are woefully inadequate, the reliability of their services is extremely poor, and it is a long battle on the phone using hours of time to try to get assistance."

"..it's Bell again. Bell should have told me from the start that promotions last only a year and they can increase the price annually. Instead I got to know about this when I tried changing my service to lower the cost. I do feel Bell does a lot of this on purpose and it is amazing that in a developed country we will still have to experience such sneaky tactics in your face."

"In using a cell phone it is completely unclear to me what the word "data" means so my bill keeps rising and I don't know why."

"With my situation they could not be honest with the huge delay in transferring the services and there is only one contact point to talk to them for which there is a 45 minute to 1 hour hold time."

"The actual agreement is not in plain language. As a result I accepted the agreement without really understanding what I was agreeing too. As such choosing a trustworthy provider was important."

"I don't recall seeing language that was not understandable to me, but I will comment:
- They use very fine print to describe details, and impose a lot of conditions on "special" deals, including very short time frames on how long a lower price will last and severe penalties for leaving early.
- They are not honest, avoiding describing the lower price packages, instead trying to sell people the expensive packages the customer does not realize they really need, unless the customer has first done homework."

"Fine print uses are as big a problem! All businesses have corporate jargon, but this should not be foisted on consumers. Telus is the worst offender, in my experience of over 6 decades of as both corporate and personal consumer customer. The office staff get their "jollies" by misleading, jerking around, and being generally unhelpful. Most times the outside techs are diligent, resourceful, and helpful."

"Terms and conditions documents are generally written in legal language without common language explanation. Yet agreement is necessary to engage, so most just agree without understanding what they're agreeing to."

"Try reading Bell's Terms and Conditions? For the life of me, I couldn't understand the change in contract I received when I added the tablet to our family plan."

“There are different brand naming conventions used for what are essentially the same services. Service level commitments are vague. For example, where do network speed commitments begin and end? The existence of specialty fee descriptions can make comparison shopping difficult. Plain language extends, I think to clear presentation. For example, service providers offer bundles of channels, but it can be difficult to compare not only among current bundle choices but between current bundle and legacy bundle choices, because updates to service may mean that continuing with legacy bundles of services is no longer on offer. Of course complex multivariate comparisons are next to impossible to do in negotiating situations where the service provider insists on conducting the negotiation over the phone without the benefit of visual representations of information during the sales conversation.”

“...the offers made by agents are usually in plain language – the problem is that the terms of use for a service are subsequently provided in legalese.”

IV MISLEADING OR AGGRESSIVE SALES PRACTICES

- 15 The OIC described misleading or aggressive sales practices as including providing consumers with incomplete, unclear or misleading information regarding service terms and conditions or selling them telecommunications services that are unsuitable for them.
- 16 In our CCC questionnaire to the PIN we asked:
- Have you experienced misleading or aggressive sales practices from a service provider? If so, provide details about that experience, including the service provider and service in question, when and how the sales interaction occurred, the nature of the sales practice used, and what avenues you may have used to address the sales practice.
- 17 In Summary: No question evoked greater responses than our question dealing with misleading or aggressive sales practices. Respondents were typically clear as to the problem and the details, and more than willing to provide them in detail
- 18 Many detailed the transition from a technical service call, to an “upgrade your service” discussion. In other words, the only or best way to solve your problem is to buy new and more expensive services. Many detailed their issues with aggressive unsolicited unwanted calls either at the door or on the phone. Another multiple example complaint was the promotion that was available only at that time on the phone and no information could be sent to describe it and give the consumer time to review.

19 Many respondents had issues with aggressive sales practices. Particularly unsolicited calls either on the phone or at the door. Verbatim responses included:

"2018 (May or June) Telus – home service package – internet & cable. Our Telus contract was approximately 4-5 weeks away from the end/renewal date. Suddenly, our Internet speed, was unreliable. It would cut out and need re-booting once a week at least. The speed would drastically drop to the point it was unusable. There were no new devices or increased usage levels to account for this. We would call Telus and speak to their tech team, who would agree this was unusual before having us re-set their box in every room. Upon having several of these conversations we inquired as to the cause/what it would take to resolve the problem (by this point it was happening every other day up to twice per day). We were transferred to customer service who proceeded to try and sell us an "upgraded" Internet plan to fix the problem. Another time we were told we could purchase or rent a newer version of their equipment (modems/PVR etc.) and that may solve the problem. Our equipment is less than a year old + we are already paying for the rental of it! As the contract end date grew nearer, our service was dropping/freezing/shutting itself off daily. Multiple times daily. Telus told us that our condo building or neighborhood must be affecting the bandwidth, and we could easily upgrade our plan to fix the issue. It worked just fine the whole time until the contract renewal date approached. I felt bullied and patronized."

"I had a person come to my door offering Bell's new Vibe service. She was extremely aggressive and when I told her that I was unwilling to sign up on the spot and would like to see the offer on paper and have an opportunity to consider it she indicated that she would send me something but never did."

"I have experienced aggressive sales calls from the company or Rogers Communications themselves, when they start to give their little sales pitch, I explain very politely we are not interested – then the aggressive sales pitch kicks in and after 3 or 4 times of I am not interested I hang up."

"Rogers repeatedly comes to my door insisting that I need their cable and Internet service. The irony is that my house is not wired for cable and they "do not fish wires" so they insist that they need to drill through my brick exterior (!) to install cable. I don't want or need their cable but they come back week after week. I have told them to leave me alone and they don't."

"Yes, depending on interpretation of sales practices – it should be clear the motivation of the big three Telcoms is unbridled greed. When institutions (public or private) are governed or managed by individuals obscenely compensated in the millions of dollars annually with equally obscene bonuses, these individual exist in an alternate universe. They cannot possibly relate to the average person earning a wage or running a small business. Management in many of these situations, are out of touch with reality, and cannot grasp the consequences of their decision making on most of the population. The staff of most large enterprises with few exceptions (like Amazon) are poorly trained and supervised, and violate customers consumer and contractual rights as a matter of routine! An example I experienced, was refusal to accept written notice of

changes or cancellation. Telus, for example is very arrogant, and in Calgary cannot be reasonably contacted by phone, but they insist you call them. It is not my responsibility to spend hours of my time trying to contact a business. A written communication signed and delivered by mail or even by electronic means is contractually sufficient for all parties to a contract."

"Bell Mobility charging \$1 a month for EXCLUDING data charges (until we protested). Rogers REPEATEDLY calling to switch (until we swore at them)."

20 Many respondents had issues with aggressive sales practices. Verbatim responses included:

"A Bell direct sales person provided pricing for a residential land line and cellular package that was not later authorized by his office. When the scheduled installation was about to take place, I had to enquire about the pricing again and was forced to cancel the installation."

"Bell advertisements offering reasonable prices for bundles that end before the time frame that I was told when purchasing the package. Then I was told by a Bell store employee to call them back and tell them that I plan to cancel the home phone. As suggested by the store staff, they came back with a package at a much reduced price."

"The sales guy came to our condo lobby and sold us the Internet package saying no activation fees will be charged and the discounted price will be there forever. Later I found out from my bills that he was lying about everything. I contacted Bell support and they waived off 50% of the activation fees only."

"Bell is the service provider. I was sold two PVR units on the foundation that I would be able to have full functionality with each. However Bell did not provide me with two Wi-Fi connectors, so I can only use the on-demand function on one of them. Hence, I was misled. I had addressed this with Bell customer care and they have refused to remedy the situation or refund me."

"Most recently, purchased a data plan for my new tablet. Was told it qualified for a "special," but on reviewing my bill, realized it was the regular tablet plan at the regular price. Took forever to get help. Although I did receive an improved plan, i.e. more data, I did not get the "special" the telco sales rep told me I was buying. As well, telco calls at least once a year to review our family plan, with four mobile phones. They try to lure us off the plan for something "better." Upon questioning, we learn the "better" plan is worse, often more money without the perks we enjoy on our old plan. They want us off a good plan, or at least an OK plan, and onto something worse. No real analysis on their part ... just sales, sales, sales."

"Phone solicitations have been pervasive and from multiple companies. None would send full details of promotions in advance of signing; I was told I'd have to sign up to get the details in the mail, at which time I could cancel. I have never trusted such claims."

"Rogers- informed of bundled package but really sold me on improved Internet (with TV and phone). I was surprised about phone included in package and billing last month in advance. Also billing was substantially higher than contracted rate (also got 2 contracts in mail). I had to call and wasted 1 hour trying to correct with multiple customer reps."

"Special offer I acted upon was misleading. Not all the info needed was provided. Said it was a same day offer and I needed to act on it that day. One misleading element was the fact that the account would be opened in my name not my husband's name even though the phone was for him."

"They hook you into a certain package and say 6 months latter or a year the bill all of a sudden becomes 162 dollars without any notice. Bell points out that in the terms of agreement they can change billing with 30 days notice . Bell told my wife and I not to worry their customer loyalty package would provide us with a very attractive package . Fifty dollars more attractive on their side of ledger. They bundle TV, Internet and phone into a package then on renegotiation TV becomes the stickler. They cannot negotiate a lower price on it and you either pay the current bill or get another carrier. We got another carrier as we knew they would change the billing down the road as terms of use allows them to change billing at any time."

"Telus regularly misrepresents pricing on their website. They first ask customers to enter their address, which then leads to a list of products available in their neighbourhood. Pricing is included. After registering for a product you have to wait for an agent to call. When the agent does call you find out that the Internet speeds are not actually available in your neighbourhood but you can have a lower grade product for a higher price. We ran this experiment three times with the same result. Each time agents confirmed that the website is not always accurate. In affect this just wastes the customers time filling forms for no gain."

"When my parents moved into a retirement residence I helped them negotiate a low-cost bundle with Bell. It was satellite TV and Internet. When they moved, we discovered the residence did not have satellite — which Bell knew. The re-negotiated bundle cost more."

"I used to be a customer of Cogeco and Bell (at different times) in the past 10 years (I dropped Cogeco about 3 years ago), and in both cases the practices were similar. As a customer I had to re-approach them regularly to get a reasonable price for their services, and after a few months my price would go up again. I finally had it, and when I tried to cancel my account it was made very difficult, requiring several transfers to different people, and having to speak with people trying to convince me to remain their customer. The hassle was crazy – if I had to do this every time I went shopping I would never have any time to do anything else! In part, it is these practices that have deterred me from getting a cell phone, since I would have to sign up with one of the few Canadian big telecom companies, and my understanding is that they continue to employ these same practices."

"The complexity of offers (bundles of service details or bundling with other services) makes comparison shopping extremely difficult. Advertised prices are not the prices offered all customers. Retail sales offices may not be authorized to renegotiate existing service

agreements. At least one carrier operates a separate, special 'customer retention' call centre. This approach to selling and renegotiating makes it more challenging for consumers to have all the necessary information in front of them. A consumer may be referred in this way even if they are in a service provider's bricks and mortar location. Discounts may be promised, but then not implemented in practice or at a lower rate than discussed."

"I recently moved and made arrangements with Cogeco to transfer phone, television, & cable services on the moving date Apr 26/18. When they did not arrive I called and they stated it was for May 3/18. I asked them to check the recorded conversation of Apr 10 to verify date. I was told to have a nice day end of conversation. They did not show up on May 3 and when we called they advised it would be another week to a month before they could transfer the services. I explained that we are a paperless household and required the Internet for our banking, investments, bill payment, etc. and that I would take a new number if it would expedite things, They said it couldn't be done. I am in a townhouse complex that does not allow satellite dishes and Bell's cable for Internet is outdated, so we had no choice on any company that could offer the 3 services. After waiting 5 weeks and using over 400 minutes on hold with Cogeco we went with a satellite phone co. and another provider for Internet. I do not have a TV provider. Cogeco did call after 10 weeks to say they could now transfer my services. You have a company that lies and cheats with their existing customer, when they're over in the local mall selling bundles for half the cost and installing in 5-10 days. They should not have a monopoly, but between themselves and Bell they pretty much control the market."

21 In our CCC questionnaire to the Public Interest Network we asked:

- In your opinion, are bundles of services, and any associated discounts, a source of confusion? Why? What telecommunications and/or television services were included or offered to be included in the bundle?

22 In Summary: Typically respondents were not positive about bundles. They saw them as either restrictive (less flexible), causing one to make a less than ideal choice because of the bundle structure, or that they were confusing or both. Several noted that the bundles expire without clear notice and the price increases.

23 Many respondents thought that bundles reduce flexibility and are restrictive. Verbatim responses included:

"...bundles seem to be created in such a way as to possibly force you to take more than one if you merely wanted to include educational, international news, travel and documentary channels that you may want to watch, as an example. Sometimes wonder why you couldn't select your own bundle."

"I do not like the fact that in order to get a certain channel I have to take several. I would prefer to just get the ones that we want."

"They're frustrating and not in the best interests of customers, however. For example, I only watch the morning News on cable. Other than that I use Netflix. It's very annoying that I have to purchase a package of channels I'll never use or want. Commercials have officially ruined cable in my opinion. Hour long cable shows are usually about 40 mins on Netflix – that's 20 mins of ad time!"

"Our other provider, Shaw, presents bundles. Some time ago we dropped the cable part of a phone-internet-cable bundle as we find there are alternatives. However, access to certain sports channels required us to reconnect to cable. But we wanted and needed only one channel and had to take a bundle of non-sports channels and a large number of sports channels to achieve this. Not a satisfactory result."

"The bundles are usually clearly described but the final price is often more than the promoted price. Often when I enquire about the bundled price they try to upsell above the bundle."

"Yes. Bell offers deep discounts, but only if you subscribe to FibeTV. Even though I have 5 accounts with Bell, because I do not want Fibe TV, I receive no bundled discounts."

"Yes. Suppliers keep offering us bundles and then discover we are in a rural area and cannot receive what they promised. Bell in particular promises the world and then assures us the only option is a vastly more expensive hub tool which we cannot afford."

"Both Bell and Rogers have repeatedly sent bundled "deals" as promotions. Yet almost invariably all such promotions have small print indicating that the special is only good for one year and won't even commit to the 'non discounted' price beyond the 13th month."

"The main issue I have with bundling is that, when registering, I sign up for specific programming, then am unhappy to discover that after a time, the bundling package changes without my prior knowledge, and specific programmes are no longer included and must be purchased separately."

24 Many respondents thought that bundles are confusing: Verbatim responses included:

"Bundles of services are confusing primarily because they are constantly changing. The vast majority of bundling offers are presented verbally and the telecommunications companies expect a verbal response before they provide you with details of the offer."

"If the Internet service was forced to say your cost for a standard package [industry wide] costs \$58.80 they could not use a smoke screen by using different terms. The Internet true

speed kbits / gbits per sec and this is a 24 hour proven speed registered with the CRTC. this package was for TV, telephone and Internet.”

“Bell has misrepresented the products in the full bundle (landline, Internet, and sat TV). They have refused to deliver per the agreement.”

“Very confusing and they make comparison shopping very difficult.”

“Yes, bundling is confusing. Makes it hard to compare ‘apples-to-apples.’ Confusing the consumer means telcos can more easily upsell.”

“Yes. The consumer doesn't know where the telecom agreement and broadcast services (program) agreements begin and end. The tied selling and the restrictions on product by service provider or channel can make it difficult or nearly impossible to rent or buy content outside of a bundle. Why is 'TV' content bundled, but movies, music and books are not? It seems like a restraint of trade. It's getting harder to know in negotiated purchases whether behind the scenes the offers available result from tying and cross-subsidization of services (broadcast to telecom, or vice versa). Offers are not presented on any basis to be rationally understood.”

25 Some respondents thought that bundles are confusing and restricting. Verbatim responses included:

“If only a single price is given for a bundle it is very confusing. However, the other item that always comes up is promotional pricing on components of the bundle. You can be quoted a bundled price but the bundle is based on a 6-month promotion for interim service. After 6 months the bundle price increases because one component has increased. Furthermore, a service provider can discontinue a service and migrate a customer to a higher priced item. For example, we had unlimited Internet Telus 75. But when Telus 100 was launched we were forced to migrate to the higher speed, at a higher price, but lost the unlimited usage. So this would have added a further cost to us to pay \$15 more to get unlimited service back. We were quite happy to have kept the Telus 75 which suddenly was no longer an option. In the grand scheme of things the speed difference was negligible and this appeared as a way for Telus to rip off their customers.”

“Bills received for phone, Internet are confusing. They tell you the “bill date”, but not the billing period as the utilities' bills do. The bill states I used 34.975 MB outside of my plan which cost me 8.36. When and where did this occur? This phone is not heavily used. What is \$14 of “partial charges, \$15 add on charge, \$22 usage charge also the same bill. Hardly ever look at bundling offers. Cable is the worst, offer you all the channels you don't watch and charge triple for the few that are your favourites.”

“Completely confusing! Bundles are a great way for them to lock us in. Bell again sold me a bundle saying it's \$99 per month for Internet, cable and home phone. But after a year I saw the price go up without warning. When I tried to change or cancel the plan they told me that the end dates for the contract term were different for Internet vs. cable vs. phone and therefore

canceling the plan will cause penalties! So I had to cancel each service individually and it turns out they put me on contract for a longer term than I had agreed for."

"Yes, they are confusing particularly with respect to the TV channels that are included in the various packages. Also if you just choose the ones that you want, you pay a much higher price."

"Yes, because each service providers bundle is different, so you can't compare bundles across service providers. Also, the bundles include services that we don't want, but would have to take."

"Yes, because they are designed to take advantage of the often less astute consumer, and not provide for their needs. Bundles are fine as long as there is flexibility, and there is no fine print designed to mislead, trap, or otherwise take advantage of consumers. Escape clauses must be clear, and spell out the consequences."

"...bundles are an easy way for the telecom companies to confuse customers. First, it makes it very difficult to compare between companies, since the combinations are all over the map. Second, the cost of services without bundling are crazy – much higher than in other countries with our standard of living – and there doesn't seem to be anything we can do about it. I can't believe I used to pay upwards of \$70-80 per month for television services that I can get over the air or (now) over the web. The attempt to "force" these companies to make available a basic low cost service has failed in my opinion. A friend in my area (in rural area) got one of these, but it only lasted for a year, before the service started losing channels, and the company said she had to move to a more expensive plan to retain her service. I pay for an Internet service, and as more faster speeds are introduced, the prices for the low speeds (what used to be 'fast') have not dropped. I'm still paying over \$50/month for a 30 Mbps service, and that is one of the least expensive available! And how much did Bell (as an example) make in profit last year? While paying most of their employees a pittance (part time, no benefits)?"

- 26 Surprisingly, only one response was positive about bundles, although the poor showing could have been influenced by the wording of the questions, asking specifically if bundles are confusing.

"Bundles are fine, clear that it saves money to group services with one provider."

V OLDER, DISABLED OR LANGUAGE BARRIER EXPERIENCES

- 27 The OIC noted that vulnerable Canadians, such as those who are vulnerable due to their age, a disability, or a language barrier, are more likely to be impacted by misleading or aggressive sales practices

A Disabled Canadians

28 In our CCC questionnaire to the Public Interest Network we asked:

- As a Canadian with a disability, did you find that the service provider accommodated your needs to ensure that you were able to make an informed decision about the telecommunications and/or television services sold or offered for sale? If so, how? If not, what else do you think could have been done to help you to make an informed decision in respect of the sales interaction?

29 In summary: Few respondents answered this question. No one specifically identified as disabled and we believe we can draw no general conclusion or insights from the detailed responses.

B Older Canadians

30 In our CCC questionnaire to the Public Interest Network we asked:

- As an older Canadian, did you find that the service provider made an effort to ensure that you were able to make an informed decision about the telecommunications and/or television services sold or offered for sale? If so, how? If not, what else do you think could have been done to help you to make an informed decision in respect of the sales interaction?

31 We begin with one particular response. It is important to note that in our questionnaire we asked the question almost verbatim from the Commission's notice of consultation document. The following response was singular, it surprised us, but given the sharpness of the response we set it out for the Commission's consideration:

"I am older but I am not technologically illiterate so I find this question insulting and an example of ageism and you should rethink asking this type of question. It is offensive."

32 In Summary: Typically most respondents who commented were not positive in their views on how service providers dealt with older Canadians. Often they were relating stories of efforts they made on behalf of their aging relatives. They suggested more personal on-site assistance, larger print (an issue not restricted to older Canadians), talking slower and using simpler terms when talking. (We particularly liked the suggestion of using red and green nail polish on buttons for

off and on. While some may chuckle at this, it is often simple practices like this that can make a difference). Verbatim responses included:

"My 82 year old grandmother was recently persuaded to upgrade her home services plan from Shaw to include high speed Internet (she doesn't own a computer or know how to use one)."

"I do not think they make an effort and I would prefer that they print things out simply and clearly."

"I am a senior with a physical disability. On occasion, particularly if I'm with someone younger than me, I find that the person I'm dealing with ignores me and addresses only the younger person. Very frustrating! What can be done? Treat me as an intelligent person able to communicate my own concerns and questions – don't ignore me or speak in a condescending manner."

"I would say that having a tech take time to walk them through how to use programming, provide picture/ very simple instruction quick sheets, and simple versions of remote controls (we had to tape over 90% of the buttons on grandma's TV remote, then paint bright nail polish on the remaining ones, i.e.: Green=on. Red=off"

"They talk very quickly in an aggressive manner so they are difficult to understand."

"Service providers should offer seniors discounts or packages specifically tailored to typical seniors' requirements."

"(They) do not explain the technical side which results in higher bills because I don't know what to ask. Use jargon that is unfamiliar to me."

"The pamphlets they provide and/or the information on their websites is very good."

"I am an older customer. However my kids helped me decide what I needed."

"I have not found this to be the case. In the situation with my friend, the 'basic' package disappeared despite her asking, and yet it is still apparently available. The company hid that option from her. Cogeco called me back after I cancelled, trying to get me to stay on, and I said plainly that this was the price they were charging me, and I have no interest in repeatedly wasting time haggling. They had no real answer for that – the best they could do was offer me a lower price for a few months. My question is, if they can afford to offer the lower price, why don't they do it all the time? Because many customers give up and live with the higher prices. And because the company is greedy."

"Providers should offer home service when their product needs to be installed into an existing unit in the home – they should not expect to sell the product without the opportunity of having it installed, especially for senior citizens."

"(They) take advantage of your not understanding so that when you question something and get it explained later you feel stupid and cheated."

"I am in my late 70s, and I doubt that most Canadian service providers, even consider in this era, the rights, needs, or well being of consumers. Greed is the prime motivator of most management at present. Outlaw fine print! Illegible, hidden, or otherwise not obvious conditions of sale, are not a legal basis for a transaction. (I)n the U.S., Spectrum (formerly Oceanic Time Warner) spent an inordinate amount of time, explaining in great detail all the ins and outs of providing Cable Internet and VOIP phone service to me (although a bit tiring, because I already had researched the services online), it was very informative."

"Visual presentations of option comparisons the consumer can take with them to consider versus competitors and within the choices the provider will offer."

"Just plain simple terms not many older citizens are tech savvy."

C Language Barrier

33 In our CCC questionnaire to the Public Interest Network we asked:

- As a Canadian with a language barrier, did you find that the service provider made an effort to ensure that you were able to make an informed decision about the telecommunications and/or television services sold or offered for sale? If so, how? If not, what else do you think could have been done to help you to make an informed decision in respect of the sales interaction?

34 In Summary: No respondents considered identified themselves with any language barrier. Nevertheless, multiple respondents indicated difficulty understanding some representatives from the service providers, particularly while on the phone. More understandable representatives (even for Canadians without language barriers) and clearer language and presentation would help with this issue. One suggested a more visual solution to provide information to those with a language barrier. Verbatim responses included:

"I have a moderate to extremely difficult time understanding many outsourced reps. I'm sure it's difficult both ways – constantly repeating ourselves "

"Corporations should be prepared to provide a rep that can be understood. If there is a language problem, having an alternative rep who can be understood should be provided."

"A local office here in Newfoundland could mean local accents would not be a problem."

“Detailed simply written terms, explanations, and diorama should be provided to the consumer, before the contractual agreement is binding (30 days). Diorama probably in this era, will be an effective manner to get concepts across, designed to be cultural, and language bias free.”

D Existing consumer protections

35 In our CCC questionnaire to the Public Interest Network we asked:

- Are existing consumer protections sufficient to ensure that Canadian consumers are treated fairly in respect of retail sales practices? If so, how? If not, why not?
- What are the main gaps, if any, in existing consumer protections when it comes to the retail sale of telecommunications services or bundles of telecommunications services and television services?

36 Respondents did not refer to specific provincial consumer protection legislation nor did they refer to any of the Codes set out by the CRTC. Respondents were typically of the view that consumer protections were inadequate. The areas of issue were lack of enforcement and unawareness of consumers of what constituted those consumer protections, a lack of an Ombudsperson, and a lack of competition. The resulting (or precipitating) corporate sales culture was often seen as a significant contributor to such malpractices.

37 However, not all respondents thought there was a problem:

“Many companies bundle services and offer discounts for volume sales – not just telecommunications. It is up to the consumer to do the math and decide which suite of services best suits them. As far as gaps in consumer protection, Canadian telecoms are regulated by the CRTC, ISED, the Competition Bureau and also fall under provincial consumer protections statutes. There is even a specific complaint service operated by the federal government (CCTS). If there are still gaps with all those regulators involved there is something very wrong.”

38 Many respondents cited lack of enforcement: Verbatim responses included:

“Heck, no. Try complaining to a large telco about a sales issue. Takes forever. Need improved consumer advocacy at the telco level, backed by government enforcement of current consumer protection laws.”

"No. Weak laws with license to commit crime penalties and weak enforcement. CRTC complaints process dismisses valid complaints, hearing process is slow to proceed/get started, industry is too influential in the CASL processes. Public trust is low."

"National Do-not-call List should be more prominent and better enforced."

"It is my impression that government does not enforce the regs on the books or care what happens to consumers."

"Canada should adopt European standards, particularly like Ireland. I.e.: companies are assumed guilty until proven innocent and the grounds for judgment is not what the contract says but what a reasonable person should expect. Canadian regulations rely too much on contracts (hence the incentive for confusing legal language). If the courts ignored the contracts and judged by reasonable expectations business would stop using contracts."

"Better enforcement of existing consumer protection laws would be a good start."

"Penalty levels are low, insufficient vigour in enforcement prevails, a good mechanism for receiving consumer advice is absent (i.e., a properly run stakeholder advisory council), and trust in dispute resolution is at a low level."

"Should be tougher, more specific rules that all telecommunications companies MUST FOLLOW. Thinking that any group will patrol themselves is delusional."

39 Many respondents cited a lack of consumer awareness, or disclosure requirements, or an Ombudsperson to whom they can turn: Verbatim responses included:

"A rate card should be available online and by mail. The prices for each company should be consistent and set out in such a way that consumers can compare services within a company, and competitor companies. Even if the consumer chooses to switch providers, it often takes weeks to switch over."

"Absolutely not! A prime example is the trading practices of "All Canadian Superstores", which use a large type counter price, qualified by extremely fine print often illegible terms, at best multiple font sizes. This in addition to posting prices for produce in pounds, and charging in kilograms. If that is not a covert attempt to confuse consumers, then what? Governance is biased more in favor of the establishment, and the 1%. Consumers, often less sophisticated, are often disadvantaged. Traps, and mazes are the business order of the day."

"I don't know what the protections In Place today are."

"I'm unaware of what consumer protections are available except that we can terminate anything agreed to 'at-the-door' within 24 hours."

"No they are not because most consumers have no idea what their rights and protections are."

“One example comes to mind: When the 'basic' cable service was enacted, as far as I know there was no requirement that it be clearly publicized along with all the other packages. Without that requirement, the 'basic' service was buried, not mentioned in sales calls unless the customer mentioned it. It should have been treated the same as all the other packages, but the companies get less money from it, so minimize its publicity as much as possible.”

“I don't think so, should have ombudsman to contact since these companies really do not care about consumers since they have oligopoly. ”

“They don't seem to be working if there's constant complaints and they take place after the fact. Many people also don't follow up with a complaint.”

“Not really. If one launches a complaint some items go to CRTC. Some go to Competition Bureau. Some go to Commission for Complaints for Telecom-television Services (CCTS). There is an Office of Consumer Affairs federally and in each province. This is so confusing where to start a complaint!”

“Cannot make contact with anyone at the company in a reasonable time. No support systems.”

“There is no protection to consumer. File a complaint to carrier or to CCTS and they [CCTS] tell you they can advise Bell, etc., that all is not on the straight and narrow but have absolutely, no power to do anything about it – just go through the motions.”

“People are not aware of the protection that does exist and how and to whom to complain if there is a problem. If they did complain what if any action would be taken?”

“People probably don't know where to turn if they have a problem.”

40 A significant number of respondents cited, here and elsewhere, the lack of real competition. There is a strong view that costs in Canada are higher than elsewhere, particularly in the US. Verbatim responses included:

“Absolutely not. We are stuck with a near-monopoly situation with extraordinarily high prices for the services provided. I understand that we are the second most expensive in the world. There is no justification for this.”

“Bell Fibe has been installed in my neighbourhood. Yet my Internet provider, TekSavvy, tells me that Bell won't let them resell it to me as happens with slower speed services. This is blatantly anti-competitive behavior.”

“I don't think current protections are adequate, but I honestly don't know what else could be done. These companies have a lot of power – even though they have a bad rating from customers, it doesn't matter because Canadian customers have only limited choice. They are not breaking the law, they are just behaving badly, like the greedy kid on the block. The best solution I can see is not to buy unless the consumer is treated better, and most people are not

willing to do this. If I call to register a complaint, I might (or might not) get my issue resolved to my satisfaction, but the general poor practices will continue (at least they have to date)."

"The cards are all stacked against the consumer. We pay the highest rates for high speed Internet. Can you imagine the cost to a growing family to have access to the world for educational purposes? Bell is allowed to buy competitors, rename them and raise the rates, discontinue service to others so they have to buy high-priced Bell affiliates. [Ontera is one example of this]."

"The fundamental problem is the way services are being sold involves many small choices, anti-competitive tied selling of base-level products and an adversarial and ultra-competitive posture by the suppliers versus their customers or prospective customers. Consumers are at an information disadvantage. The actual diversity of meaningful choice is limited. For example, in many areas effective service competition in telecom ends at a low standard of service. There may be no or only one or two alternatives to choose from. And just because service level choices could hypothetically exist (say over upload or download speeds), that doesn't mean they are actually available to the consumer. What if a consumer wants to buy upload speed unbundled from download speed, for example? There could at least be more choices within some technological frameworks. Or given the growing significance of uploading, service packages might better reflect this direction of usage."

"What protections? The market should be open to more than 4 providers. Competition would keep them honest and the costs would be much better."

"No way! Have you seen how much better it is in the US? They really go out of their way to treat customers fairly because there is real competition there plus strong consumer laws. Canada does not protect consumers as well. The system is built for these companies not for us."

"The services are suspiciously similar in price. Fixing?"

"... this is a difficult problem to solve. With the power that companies and the free market have in our society, any solution that cuts into profits will be difficult to enact."

"Consumers are at a big disadvantage, because business and government are armed with huge resources. Consumers, have been forced into a place between a 'rock and a hard plac'" by the 'Establishmen', which has designed a more covert form of enslavement, where workers rights and compensation has regressed considerably, making daily life more oppressive."

"Inadequate competition – allow foreign operators to enter the market and existing providers will smarten up or go out of business."

"Prices are substantially higher than other parts of world. Oligopoly practices as onus always on customer to get it right and waste time with them at multiple levels in their organization for complaints."

"Prices need to come down, just as they have come down with Ontario Hydro. The prices Canadians are charged are extortionate. There needs to be price caps and increased protections."

"The problem is less one of consumer protection than from a lack of real competition. Each of the three national telcos operates multiple subsidiaries (example: Rogers owns Fido and Chatr) which offers a superficial but fake appearance of competition. Then when there is ever a threat of real competition (as happened when Verizon was looking at the Canadian market), Robelus engaged in a coordinated astroturf campaign in opposition."

"Look at prices in the USA vs. Canada for mobile phones."

41 Many respondents referred to actions displaying a corporate culture that eschews consumer protection and supports such practices. Verbatim responses included:

"These days, sales people have no compunction about lying if it makes a sale. If you complain, you're forced to still deal with the same company."

"Embedded sales cultures – sales staff forced to sell using any techniques they can or they are fired for non-performance."

"Major telco systems seem too complex. I have talked with many reps in customer service who seem to want to do the right thing, but find the company computer systems are not aligned with how they are told to treat customers. The battle to help is often stymied by inflexible computer systems/programs/choices."

"I am less convinced consumers are being misled than I am they are being irritated. If irritating sales tactics were an offence a lot of retail service providers would be in jail."

"Crack down on cold calls from robocallers and fraudulent companies. We get several a day. We do not have call display and they call back continuously."

"Consumers can be satisfied with subscription bundling of content. But given current pricing practices, piece purchase prices should be more reflective of how content is actually valued within bundles. This seems to be starting to happen outside the arms of Canada's traditional television service providers. It's certainly slowly becoming the case with many other kinds of intellectual property product. Telecom service structures may need to offer more choice, but also be more standardized and comprehensible, as well. However, something that has emerged that's significant is that sales behaviour may need some preventative oversight. It's not clear, also, based on the statements of some telecom company employees that this oversight can just be self-regulatory in nature. The industry might benefit from being nudged to better practices. We may also be witnessing an industry exercising choices because they are trying to function within a regulatory framework it can no longer count on, because it's continuing to lose the confidence of consumers, whether that's fair or not."

42 Some respondents suggested a lack of safeguards and disclosure in a complex environment. Verbatim responses included:

"Providers should be providing more details with respect to the contents and expiry dates. Often you agree to a monthly rate, then without notice your rates change without your consent or an alternative."

"Complex Use of clear and simple language. Providers being forced to provide all the options available, particularly those that are low-cost."

"Not allowing simple choices."

"There are no safeguards. For example, my ex partner loved sports. He ordered all the sports networks. It was a 3-year contract. 2.8 years in we broke up. I was suddenly paying full rent of \$1,400 + utilities, car payments and a \$260+ Telus bill on a \$2,000 a month salary. I explained my situation and begged to have my contract scaled back so I could afford it. They couldn't have been less reasonable. It was devastating."

"Overpriced services, with use caps, extra charges, and unwanted or unneeded services, linked to basic necessities of today's economy. High speed Internet is no longer an option, but is as basic a telecommunication as phone service. Both Cell service and high speed Internet basics should be regulated as essential services."

43 Some respondents suggested remedies. Verbatim responses included:

"Ability to cancel bundle plans is very convoluted and companies like Bell have found a way to lock us in. Regulations are required where bundles should be sold as a single product as opposed to multiple. That way you don't have to deal with contracts for each of the multiple items."

"Prices should be clearly stated. No asterisk. Customers should be able to cancel without penalty and be able to switch providers. Long-term contracts should be banned."

"Direct sales representatives at the door should be able to print an offer, or send the offer by email within a space of a few hours."

E Who should be involved in the solution?

44 In our CCC questionnaire to the Public Interest Network we asked:

- Who should be involved in the creation or strengthening of consumer protections? What should their role be?

45 There were a multitude of responses, with respondents effectively suggesting all the usual parties. There was, however, a significant bias towards the increased involvement of consumers and consumer groups, a view with which we strongly agree. However, given the nature of the PIN constituency and their involvement in many CCC questionnaires and a predefined interest in consumer issues, we accept that this may not be a representative view of the average Canadian consumer. More notably, there were strong suggestions that stakeholder consultations be conducted (not unlike this consultation process we assume), as well as pointed views regarding the responsibilities of the CRTC and in some cases a suggestion of its misguided focus.

46 Government involvement was suggested by many respondents, but few details were given. Verbatim responses included:

"A new consumer protection act is required. It should be designed similar to human rights laws – with certain aspects such as personal information and reasonable expectations being above contract law – always guaranteed regardless of what the consumer agrees to."

47 Many respondents had views on the role of the CRTC. Verbatim responses included:

"– regulations; independent consumer watchdog organisations – give them funding to investigate and expose offences; an independent court to rapidly enforce punitive measures when the providers do wrong."

"The CRTC has not been very proactive in these matters, and should be more aggressive on the side of the consumer. They state that their mandate is: "The CRTC is an administrative tribunal that regulates and supervises broadcasting and telecommunications in the public interest." So stop protecting or going easy on the telecommunication companies and get aggressive. They won't go anywhere. Bell made over \$3 billion in net income in 2017 – every Canadian Telecom company can afford to give more to their customers (lower prices, less complicated plans, and shareholders can live with a little less money in their pockets (at the cost of the consumer)."

"I honestly do not think CRTC has the consumers point of view at the centre of their decision making at all times. We need a separate body that protects only consumers. And that body needs to be emboldened and supported by the government bodies."

"The CRTC is of course at the heart of regulation, along with appropriate federal government departments. Consumer groups such as the CCC should be provided a role to independently monitor the success of policy and implementation, as well as offering an independent environment to collect complaints and disputes."

“The CRTC may need a new policy framework within which to operate. Consumers and consumer groups need to be able to intervene on a funded basis with respect to OTA broadcasting or in any other area of regulated access to providing or obtaining content supervised by government or its agencies. There needs to be a level playing field for discussing service commitments. The Competition Bureau and provincial consumer protection departments should step up and deal with the common classes of sales misconduct, clearly already subject to their oversight in law. However, some aspects of the problem result from a national policy framework around content production and marketing that is growing more problematic and less satisfying to Canadians.”

VI WHAT CAN BE DONE?

48 We asked:

- **What should be done to reduce any misleading or aggressive retail sales practices of service providers?**

49 One particular response sums it up:

“I am very disillusioned with the level of service provided by telecom companies here. It is appalling to say the least. We need stronger consumer protection agencies who can fine these companies and keep them in check. And we need more competition in this space. It's just not enough.”

50 Many respondents suggested the need for advertising rules. Verbatim responses included:

“They should be held accountable for false advertising, and price caps should be introduced. The monopolies should be broken.”

“Misleading or misrepresentation has a very specific meaning. Materiality and general impression need to be assessed and there are formal ways of doing this. Your question needs to be more specific. Aggressive sales practices are quite different. Most provincial governments provide cooling off periods on contracts. Best way to deal with that is continual public exposure through the media.”

“Penalties for companies caught trying to mislead. Report website to allow for follow up from authorities.”

51 Many respondents cited the need for increased consumer choice. Verbatim responses included:

"End long term contracts, unless reasonably escapable. Permit verifiable electronic cancellation of contract by consumer within 30 or 60 days."

"For one, require companies to commit to and state the rates of promotional prices after the initial (usually 12 month) period ends. Ensure that opting out of plans after the promotional period ends is easy and without any penalty."

"Change their commission structure? Allow customers to change their contracts if they have a valid reason, offer an actual example of what the monthly bill will look like once fees and taxes are accounted for."

"Require full disclosure of all options."

52 Many respondents cited the need to increase real competition. Verbatim responses included:

"I am at a loss here. As long as we have a choice of only 2 or 3 providers, and everyone wants one or more services (at least internet and cell plans), the companies have customers over a barrel."

"Open up the market. The four now may have to clean up their act."

"We pay exorbitantly for communication purposes . The big players have squeezed out the small companies. More should be done to encourage and maintain a healthy field of competition. The big players have a monopoly on the market . Renting lines from Bell, etc., should be ensured by CRTC or an ombudsman at a reasonable market price."

53 Many respondents indicated the need for increased enforcement, fines and/or restrictive regulation, seeing it as a reason for seemingly unchecked misleading and aggressive sales practices. Verbatim responses included:

"Government should prosecute as per federal and/or provincial consumer protection laws."

"Outlaw door-to-door and phone solicitation."

"Start penalizing companies for doing so. Refunds + penalties should be paid out to consumers for every infraction on their part."

Stricter laws and less reliance on contract language in courts.

"Fines or loss of 6 months or so of be able to sign up new customers."

"Increase the amount of the fines so they hurt."

"Increase the penalties, including criminal penalties where they are not in place."

"Severe and timely financial penalties, with associated media attention."

"Some hefty fines for poor business practices on a single case basis and make provider buy air time to let consumer know of the infraction."

"Everyone should be able to be put on a 'do not call list' – a real one that is enforceable."

**54 Some respondents cited monitoring as an effective way to reduce malpractices.
Verbatim responses included:**

"Corporations should provide penalties for sales people being so aggressive. They should also be prepared to remedy the problem."

"The most annoying day-to-day problems could be relieved somewhat by some enhanced regulatory surveillance and feedback delivered more 'day to day'. Of course, just drawing a line in the sand and ending cross-service bundling could remove some confusion by just taking it off the table altogether. The skinny basic package was a feint in that direction. The idea is the consumer is paying for a basic telecom connection to receive what they would otherwise be entitled to receive 'for free' if certain channels were available to them over the air. It's sad so many Canadians even in densely populated areas are now disenfranchised from free OTA TV and have to pay a telecom charge that other Canadians need not pay for the same service."

"Regulatory monitoring. Establish independent ombudsman for whistleblowers. Current CRTC complaint mechanism only deals with consumers and not telecom employees."

"There needs to be oversight by an industry association or government with respect to advertising and sales practices."

55 Other suggestions provided by respondents, verbatim:

"Perhaps a paper trail – a physical contract sent out in the mail – might help clarify things, especially for seniors."

"Allow consumers to request tape of call."

"Clear pricing legislation that forces detailed but all-in pricing."

"Do not allow sales when the contact is initiated by the consumer (i.e., as part of a bill inquiry or complaint)"

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