



## Broadcasting and Telecom Decision CRTC 2014-48

PDF version

Ottawa, 7 February 2014

### **CISC Business Process Working Group – Non-consensus report BPRE083c regarding service cancellation requests and disconnections in the customer transfer process**

File number: 8621-C12-01/08

*In this decision, the Commission approves the CRTC Interconnection Steering Committee Business Process Working Group’s recommendations regarding changes to service providers’ operational support systems and business processes to simplify the customer transfer process, as set out in Broadcasting and Telecom Regulatory Policy 2011-191. The Commission also determines that service providers should ensure that when customers change service providers, there should be no billing overlap or service interruption for customers.*

#### **Background**

1. In Broadcasting and Telecom Regulatory Policy 2011-191, the Commission set out measures to simplify the procedure to be followed when customers wish to change their telecommunications and/or broadcasting service provider. Under these measures, a customer’s new service provider may cancel service from the previous provider on the customer’s behalf (i.e. acting as the customer’s agent).
2. The CRTC Interconnection Steering Committee Business Process Working Group (the BPWG or “the working group”) has been working on developing solutions to implement changes to the existing customer transfer process, consistent with the Commission’s determinations set out in Broadcasting and Telecom Regulatory Policy 2011-191. The BPWG previously submitted two reports to the Commission in this respect: a consensus report<sup>1</sup> outlining its proposal and a non-consensus report<sup>2</sup> seeking the Commission’s assistance in setting an associated implementation date.
3. In Broadcasting and Telecom Decision 2013-261, the Commission approved, among other things, most of the working group’s proposed recommendations set out in those reports regarding the customer transfer process, and determined that the associated process and system modifications, as well as any new process related to the cancellation of wireless services, be implemented industry-wide by 23 May 2014.

---

<sup>1</sup> The consensus report is BPRE083a – *Customer Transfer Process*.

<sup>2</sup> The non-consensus report is BPRE083b – *Implementation Date for Customer Transfer Process*.

## The report

4. On 16 July 2013, the BPWG submitted for Commission approval non-consensus report BPRE083c – *Customer Transfer Process* (the non-consensus report). In this third report, the working group provided additional recommendations regarding changes to service providers’ operational support systems and business processes in order to implement the Commission’s determination regarding service cancellation by service providers on behalf of a customer, as set out in Broadcasting and Telecom Regulatory Policy 2011-191.
5. The non-consensus report can be found under the “Reports” section of the BPWG page, which is available under the CISC section of the Commission’s website at [www.crtc.gc.ca](http://www.crtc.gc.ca).
6. Throughout this decision, references to the parties’ submissions, indications, recommendations, proposals, requests, arguments, and agreements were all taken from the report.
7. The working group indicated that it reached consensus on the following six issues:
  - whether the local service request (LSR) process<sup>3</sup> should be used in situations involving partial disconnections of television (TV) and/or Internet services for business customers;
  - how service providers should respond to an error on an LSR when the disconnection request addresses multiple services;
  - how the industry should address cases of more recent authorization<sup>4</sup> for any of the services on an LSR;
  - how the industry should apply the current process for late telephone number porting on an LSR that also involves TV and/or Internet service disconnection;
  - whether a new service provider can use a residential customer’s telephone number as an alternative to their account number to identify their TV and/or Internet service for disconnection; and
  - whether there is a need and if it is feasible for service providers to integrate the multi-dwelling unit wire transfer process with the LSR-based service disconnection process.

---

<sup>3</sup> This process is used to transfer customers who are switching from one wireline or wireless telephone service provider to another (excluding wireless-to-wireless transfers).

<sup>4</sup> “More recent authorization” refers to situations in which a customer authorizes a service provider to transfer and/or disconnect multiple services on an LSR, but subsequently authorizes a different service provider to retain or transfer some of these services, in conflict with the original request.

8. However, the BPWG indicated that it was unable to reach consensus on the following two issues:

- whether service providers should be able to separate service orders for TV and/or Internet service disconnections from other service orders onto two distinct LSRs for the same customer and due date; and
- when service providers should disconnect TV and/or Internet services for cases in which (i) the disconnection requests are made in conjunction with telephone number porting requests, and (ii) telephone number porting is not involved.

9. The Commission has identified the following issues to be addressed in this decision, with the objective of ensuring that a simplified procedure is in place for when customers wish to change their telecommunications and/or broadcasting service provider:

- I. Should the Commission approve the working group's proposals regarding the consensus items?
- II. Should service providers be able to separate service orders for TV and/or Internet service disconnections from other service orders onto two distinct LSRs for the same customer, address, and due date?
- III. When should service providers disconnect TV and/or Internet services for cases in which (i) the disconnection requests are made in conjunction with telephone number porting requests, and (ii) telephone number porting is not involved?

**I. Should the Commission approve the working group's proposals regarding the consensus items?**

10. The Commission considers that all but the first item of the six consensus items listed in paragraph 7 above are consistent with the Commission's determinations in Broadcasting and Telecom Regulatory Policy 2011-191.

11. Regarding the first item, the working group indicated that disconnection of only a portion of a customer's services at a given location is a more complex process for service providers than disconnection of all services, particularly in the case of business customers. The working group added that for partial disconnections using the LSR process, the industry would have to develop a more complex set of procedures and data fields. As well, this complexity would significantly increase the risk of errors and potential service outages for customers.

12. The BPWG therefore recommended that the LSR process be used for disconnections of all of a business customer's TV and/or Internet services at a given location. However, the BPWG recommended that for partial disconnections of a business customer's TV and/or Internet services at a given location, disconnection requests should be made directly by the customer to their current service provider.

13. In Broadcasting and Telecom Regulatory Policy 2011-191, the Commission determined that broadcasting and telecommunications service providers should accept customer cancellation requests from prospective new service providers on behalf of customers. However, the Commission considers that the BPWG's above-mentioned recommendation is appropriate to avoid the risk of errors and potential service outages for customers. The Commission considers that although this recommendation is not entirely consistent with the Commission's determinations in Broadcasting and Telecom Regulatory Policy 2011-191, the resulting overall impact of implementing this divergence would be limited since it would only apply to cases of partial disconnections for business customers.
14. In light of the above, the Commission **approves** the working group's proposals regarding the six consensus items listed in paragraph 7.

**II. Should service providers be able to separate service orders for TV and/or Internet service disconnections from other service orders onto two distinct LSRs for the same customer, address, and due date?**

15. Rogers Communications Inc. (RCI) submitted that it would like to be able to issue service orders for TV and/or Internet service disconnections to other service providers on a separate LSR from telephone-related service orders, such as telephone number porting, for the same customer and due date.
16. The company argued that it is challenging to coordinate corporate systems and processes from different lines of business (e.g. telephone, Internet, and TV) to create a fully integrated LSR process. It added that LSR systems should be able to accommodate more than one request for the same customer and due date. RCI also submitted that the use of separate LSRs would better ensure that the existing customer transfer process for telecommunications services is not negatively affected.
17. The other working group participants<sup>5</sup> submitted that the current LSR process enables multiple service orders for the same customer to be divided onto two LSRs if the service orders are for different due dates. However, service orders for the same customer and due date must be on one LSR to ensure that all related implications (e.g. billing) are properly addressed.
18. The other working group participants indicated that many companies' operational support systems cannot handle multiple concurrent LSRs for the same customer and address (i.e. a second LSR cannot be issued while the first one is pending), and that changes to these systems would be complex and costly to implement. The participants argued that RCI can either (i) include all service orders for a given

---

<sup>5</sup> These participants include Allstream Inc.; Bell Aliant Regional Communications, Limited Partnership; Bell Canada; Bragg Communications Inc., operating as EastLink; the Canadian Cable Systems Alliance; the Canadian Network Operators Consortium Inc.; Cogeco Cable Inc.; Distributel Communications Ltd.; Globility Communications Corporation; Iristel Inc.; Northwestel Inc.; RCI; Saskatchewan Telecommunications; Shaw Telecom G.P.; TBayTel; TELUS Communications Company; Videotron G.P.; and View Communications Inc.

customer on the same LSR for the same due date, or (ii) separate service orders for the customer onto two LSRs for different due dates.

### **Commission's analysis and determinations**

19. The Commission notes that the BPWG indicated that service providers' processes and operational support systems have been developed and implemented on the basis that only one LSR can be issued at a time regarding changes to a particular customer's service(s) at a given location for a given due date.
20. The Commission also notes that service providers are working to implement changes in their processes and systems to abide by the Commission's determinations set out in Broadcasting and Telecom Regulatory Policy 2011-191 by 23 May 2014.
21. The Commission further notes that RCI was the only BPWG participant that proposed that multiple LSRs be issued regarding changes to a particular customer's services at a given location for the same due date.
22. The Commission considers that RCI's argument that it is challenging for the company to coordinate its corporate processes and systems is insufficient to justify the process and system changes that would be required by other service providers to handle multiple concurrent LSRs for the same customer, address, and due date.
23. Accordingly, the Commission considers that the current LSR process should continue to apply such that service providers will not be able to separate service orders for TV and/or Internet service disconnections from other service orders onto two distinct LSRs for the same customer, address, and due date.

### **III. When should service providers disconnect TV and/or Internet services for cases in which (i) the disconnection requests are made in conjunction with telephone number porting requests, and (ii) telephone number porting is not involved?**

24. The BPWG participants indicated that (i) a new service provider can install TV and/or Internet service at any time on a due date; (ii) in the absence of any specific guidelines, the previous service provider can disconnect its services at any time on a due date; and (iii) if the previous service provider's disconnection occurs before the new service provider's installation, the customer would be without service for a period of time.
25. The BPWG recommended that, to minimize service outages during the customer transfer process, the previous service provider's disconnection of TV and/or Internet service should be delayed until as late as possible on the due date, or until the day after the due date. However, the working group participants could not reach consensus on the details related to timing.

**(i) cases in which the disconnection requests are made in conjunction with telephone number porting requests**

26. The BPWG indicated that customers expect that service providers will coordinate the disconnection of the previous service with the installation of the new service. The working group therefore recommended that when feasible, the previous service provider should wait for notification that the new service provider has completed the telephone number porting before disconnecting TV and/or Internet services.
27. Some working group participants agreed that when it is not feasible for service providers to wait for this notification, the previous service provider should disconnect its TV and/or Internet service as late as possible on the due date, or anytime thereafter (e.g. the day after the due date).
28. RCI submitted that in these cases, TV and/or Internet service disconnection should not occur until at least 9 p.m. local time, since 9 p.m. is when its technicians complete evening installations. RCI indicated that this approach would reduce service interruptions and avoid an overlap in services and associated billing.
29. Some working group participants argued that they do not staff the associated functions until 9 p.m. and that new service providers could inform their customers of the risk of a service interruption.

***Commission's analysis and determinations***

30. The Commission considers that a guideline for disconnecting service “as late as possible” is too general and would lead to situations in which customers are left without TV and/or Internet service for unnecessary periods of time.
31. The Commission notes that there is no technical reason why cessation of customer billing needs to coincide with service disconnection. The Commission therefore considers that companies that do not staff the associated functions until 9 p.m. could stop customer billing on the due date and disconnect service the following day.
32. In light of the above, the Commission finds that, for cases in which a TV and/or Internet service disconnection request is made in conjunction with a telephone number porting request,
  - when feasible, the previous service provider should wait for notification that the new service provider has completed the telephone number porting before disconnecting TV and/or Internet services; and
  - when it is not feasible for the previous service provider to wait for this notification, TV and/or Internet service disconnection should not occur earlier than 9 p.m. on the due date (i.e. either 9 p.m. or later on the due date, or the following day).
33. The Commission directs service providers to ensure that there are no billing overlaps for customers in the event that TV and/or Internet service disconnection takes place after installation of the new service.

**(ii) cases in which telephone number porting is not involved**

34. RCI requested an approach that would not require an overlap in customer billing, whereby the previous service provider would not disconnect TV and/or Internet service until at least 9 p.m. on the due date (as it requested for cases involving telephone number porting).
35. Most BPWG participants agreed that since the new service provider has more control over the sequence of events than the previous service provider, the new service provider could request disconnection after its own services have been installed.
36. These participants proposed two options, both of which would involve an overlap in service and customer billing:
  - (1) the new service provider could request that the previous service provider disconnect its TV and/or Internet service after the new service provider installs its own service; or
  - (2) the new service provider could request that the previous service provider disconnect its TV and/or Internet service with a due date timed after the new service provider's planned installation date.
37. These BPWG participants argued that the billing overlap would be short and that this overlap should be acceptable to customers to ensure service continuity. The participants added that RCI's proposal would create unnecessary operational impacts on other service providers and limit their ability to automate orders.

***Commission's analysis and determinations***

38. The Commission considers that an approach that would result in a billing overlap penalizes customers and is inappropriate. The Commission also considers RCI's proposal to be reasonable for the same reasons stated previously in relation to TV and/or Internet service disconnections in conjunction with telephone number porting requests.
39. In light of the above, the Commission finds that, for cases in which telephone number porting is not involved in TV and/or Internet service disconnection, this disconnection should not occur earlier than 9 p.m. on the due date (i.e. either 9 p.m. or later on the due date, or the following day).
40. As is the case for TV and/or Internet service disconnections in conjunction with telephone number porting requests, the Commission directs service providers to ensure that there are no billing overlaps for customers in the event that TV and/or Internet service disconnection takes place after installation of the new service.

Secretary General

## Related documents

- *CISC Business Process Working Group – Consensus report BPRE083a and non-consensus report BPRE083b regarding the customer transfer process*, Broadcasting and Telecom Decision CRTC 2013-261, 23 May 2013
- *The customer transfer process and related competitive issues*, Broadcasting and Telecom Regulatory Policy CRTC 2011-191, 18 March 2011