



Broadcasting and Telecom Notice of Consultation CRTC 2015-239

PDF version

Ottawa, 4 June 2015

File number: 8657-C12-201505505

Notice of hearing

3 November 2015
Gatineau, Quebec

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

Deadline for submission of interventions: 4 August 2015

[\[Submit an intervention or view related documents\]](#)

The Commission will hold a public hearing, beginning on **3 November 2015 at 9:00 a.m.** at the **Conference Centre, Phase IV, 140 Promenade du Portage**, in **Gatineau, Quebec**.

The Commissioner for Complaints for Telecommunications Services Inc. (CCTS), as Canada's telecommunications ombudsman, helps consumers with complaints about their phone, wireless, and Internet services. It was established in 2007 in response to a direction from the Government of Canada. In 2010-2011, the Commission reviewed the structure and mandate of the CCTS.

Since many Canadians choose bundles of phone, wireless, Internet, and television services, the Commission recently decided it would add the Television Service Provider Code of Conduct to the CCTS's responsibilities. Adding issues related to the provision of television services to the CCTS's mandate will provide consumers with a single point of contact for complaints about their communications services. As set out in the Commission's most recent Communications Monitoring Report, 99% of Canadian households subscribed to telephone services, 85% subscribed to television services, and 79% subscribed to high-speed Internet services.

The Commission is asking for input on the service that the CCTS provides to consumers; the consumer experience with the CCTS; public awareness of the CCTS; company participation in the CCTS; and the mandate, activities, structure, and funding of the CCTS.

This is an opportunity for Canadians to ensure that the CCTS is well-positioned to help resolve their complaints about communications services with their service providers.

Introduction

1. The Commissioner for Complaints for Telecommunications Services Inc. (CCTS or the Agency) is a telecommunications consumer agency.
2. The CCTS's primary mandate is to resolve complaints between service providers and consumers about home phone, mobile wireless, and Internet services. Specifically, the CCTS is mandated to respond to complaints from individual and small business retail customers of telecommunications service providers (TSPs) with respect to services for which the Commission does not need to approve rates, terms, and conditions (forborne telecommunications services).¹
3. The CCTS's mandate also includes publishing an annual report on complaints, identifying trends in complaints that may warrant further attention by the Commission or the government, and administering industry codes of conduct and standards.
4. The CCTS currently administers the [Wireless Code](#)² and the [Deposit and Disconnection Code](#).³ Administration of these codes includes (i) resolving any complaints related to the Codes; (ii) monitoring trends in complaints; and (iii) reporting on both complaints and trends in its annual report. The Commission enforces these Codes by addressing issues related to delayed implementation and systemic non-compliance.
5. In addition to addressing complaints related to the codes it administers, the CCTS can help consumers with issues related to their service provider's compliance with contract terms; billing disputes and errors; service delivery, including quality of service; and credit management. The CCTS also responds to complaints related to paper bill fees and 30-day cancellation policies. The CCTS can require a service provider to provide a customer with an explanation or apology, an undertaking to do or cease doing specific activities with respect to the customer, or monetary compensation up to \$5,000.
6. On its website, the CCTS provides information concerning its [mandate](#), structure, and operational activities, including its [complaint handling process](#), [Board of Directors](#), its [performance standards](#) and [performance report](#), as well as various [documents](#) including its [annual and mid-year reports](#).

¹ The Commission refrains from regulating a service when it finds that a service is subject to sufficient competition or where refraining is consistent with the policy objectives set out in section 7 of the *Telecommunications Act*. This is referred to as forbearance. When a service is forborne, the service provider generally does not have to seek Commission approval of a tariff which lays out the rates, terms, and conditions associated with the service. The service may still be regulated by the Commission with respect to other aspects of the service.

² See Telecom Regulatory Policy 2013-271.

³ See Telecom Decision 2011-702.

Background

7. The CCTS was established in 2007 in response to a direction from the Government of Canada set out in [*Order requiring the CRTC to report to the Governor in Council on consumer complaints*](#), P.C. 2007-533, 4 April 2007 (the Order). The Order stated that all TSPs should participate in and contribute to the financing of an independent telecommunications consumer agency that would, among other things, resolve complaints from individual and small business retail customers. The Order also stated that the consumer agency should be an integral component of a deregulated telecommunications market.
8. In 2010-2011, the Commission reviewed the structure and mandate of the CCTS. In this review, the Commission determined that the Agency's governance structure and mandate were generally appropriate.⁴
9. To ensure that all residential and small business customers that subscribe to forborne telecommunications services in Canada can benefit from the CCTS's services, the Commission requires all TSPs that offer services within the scope of the CCTS's mandate to be participants in the CCTS. The current TSP participation⁵ requirement is set to expire on 20 December 2015.
10. The current CCTS participation requirement is imposed indirectly on resellers of telecommunications services via their contracts with other service providers.⁶ However, in December 2014, the Parliament of Canada amended the *Telecommunications Act* to allow the Commission to impose conditions directly on resellers.⁷
11. Recently, in the third Let's Talk TV Decision (Broadcasting Regulatory Policy 2015-104), the Commission determined that the creation of a Television Service Provider (TVSP) Code of Conduct (TVSP Code)⁸ was warranted and necessary.⁹ The Commission also determined that the CCTS would be the appropriate ombudsman to administer this Code. The Commission observed that an increasing number of consumers are taking advantage of bundled offers which include local voice, wireless, Internet, and television services offered by the same service

⁴ See Telecom Decision 2010-921 and Telecom Regulatory Policy 2011-46.

⁵ Due to changes in legislation for charities, the CCTS changed the name of its "members" to "participants" in 2015.

⁶ Specifically, the Commission imposed a requirement on carriers to include CCTS participation as a stipulation in contracts with resellers.

⁷ See the *Economic Action Plan 2014 Act, No. 2*, which received royal assent on 16 December 2014.

⁸ This Code for Canadian consumers would govern certain aspects of the relationship between TVSPs and their customers. A TVSP is an undertaking that provides subscription television services to Canadians. It typically redistributes programming from conventional over-the-air television and radio stations and distributes pay audio, pay television, pay-per-view (PPV), video-on-demand (VOD), and specialty services. TVSPs are also known as broadcasting distribution undertakings (BDUs).

⁹ In Broadcasting Notice of Consultation 2015-105, the Commission initiated a proceeding in which it called for comments on a TVSP Code working document.

provider, making it ever more important to have a consistent approach to informing consumers and dealing with their complaints. The Commission noted that details regarding governance and funding related to the administration of a TVSP Code would be dealt with specifically as part of an upcoming review of the CCTS's structure and mandate.¹⁰

12. In Broadcasting Notice of Consultation 2015-105, the Commission set out a draft TVSP Code for public comment.¹¹ Pursuant to that notice, parties had until 25 May 2015 to [comment](#) on the draft TVSP Code or file an [intervention](#).
13. See Appendix 1 of this notice for more background regarding the creation and evolution of the CCTS.

Call for comments

14. The Commission hereby initiates a public proceeding under both the *Broadcasting Act* and the *Telecommunications Act* to review matters associated with the CCTS and invites comments on a number of issues. In particular, in their submissions, parties are asked to respond to the questions set out in [Appendix 2](#) of this notice.
15. The specific issues are as follows:
 - the service an independent communications ombudsman provides to consumers;
 - the consumer experience with the CCTS;
 - public awareness of the CCTS;
 - participation in the CCTS by communications service providers;
 - the CCTS's mandate;
 - the CCTS's structure;
 - the CCTS's funding model; and
 - a future review.
16. In their interventions, parties should provide supporting rationale and all evidence on which they rely to formulate their positions.
17. In order to ensure that the Commission has the factual record necessary to conduct its review, and to assist parties in formulating their interventions, Commission staff

¹⁰ The Commission confirmed its intention of holding a public hearing to review the CCTS's structure and mandate in its *Three-Year Plan: 2015-2018* released in April 2015.

¹¹ See footnote 8.

have requested information from the CCTS and certain TSPs that are participants in the CCTS by way of separate letters issued today. Responses to these requests for information are due by **20 July 2015** and will be added to the public record of this proceeding and will be available on the Commission's website at www.crtc.gc.ca.

18. Also, in order to facilitate further engagement by Canadians on the issues addressed in this notice, the Commission will open an online discussion forum from **3 to 9 November 2015**. Following the online consultation period, the record for the online discussion will be made part of the record of this proceeding. Parties to this proceeding will have an opportunity to comment on these discussions in their final submissions. Transcripts of the online discussion will also be made available on the Commission's website at www.crtc.gc.ca.
19. As a result of this proceeding, the Commission could impose CCTS-related requirements on all TSPs (including wireline, wireless, voice over Internet Protocol (VoIP), and Internet providers) that provide services to residential and small businesses and broadcasting distribution undertakings (BDUs), whether or not they choose to file an intervention to this proceeding.
20. The record of the proceeding initiated by Broadcasting Notice of Consultation 2015-105, which calls for comments on a TVSP Code working document, is made part of the record of this proceeding.
21. It should be noted that the following issues are outside the scope of this proceeding:
 - the contents of any of the codes administered by the CCTS, namely, the Wireless Code, the Deposit and Disconnection Code, and the forthcoming TVSP Code;
 - the appropriateness of the CCTS becoming the administrator of the forthcoming TVSP Code; and
 - the interaction between the CCTS and the Commission's new power to impose Administrative Monetary Penalties (AMPs) on TSPs for violations of the *Telecommunications Act* and any decisions or regulations the Commission makes pursuant to the *Telecommunications Act*.

Procedure

22. The *Canadian Radio-television and Telecommunications Commission Rules of Practice and Procedure* (the Rules of Procedure) apply to this proceeding. The Rules of Procedure set out, among other things, the rules for the content, format, filing, and service of interventions, replies, and requests for information; the procedure for filing confidential information and requesting its disclosure; and the conduct of public hearings, where applicable. Accordingly, the procedure set out below must be read in conjunction with the Rules of Procedure and their accompanying documents, which can be found on the Commission's website at

www.crtc.gc.ca, under “Statutes and Regulations.” The *Guidelines on the CRTC Rules of Practice and Procedure*, as set out in Broadcasting and Telecom Information Bulletin 2010-959, provide information to help interested persons and parties understand the Rules of Procedure so that they can more effectively participate in Commission proceedings.

23. The Commission will hold a public hearing, beginning on **3 November 2015** at **9:00 a.m.**, at the **Conference Centre, Phase IV, 140 Promenade du Portage, in Gatineau, Quebec**. The hearing is expected to last no longer than four days.
24. Interested persons who wish to become parties to this proceeding must file an intervention with the Commission regarding the above-noted issues by **4 August 2015**. The intervention must be filed in accordance with section 26 of the Rules of Procedure and must include one of the following statements in either the first or the last paragraph:
 - 1) I request to appear at the public hearing.
 - 2) I do not want to appear at the public hearing.
25. All parties may file reply comments with the Commission by **20 August 2015**.
26. Parties are permitted to coordinate, organize, and file, in a single submission, interventions by other interested persons who share their position but do not wish to appear at the hearing. Information on how to file this type of submission, known as a joint supporting intervention, as well as a template for the accompanying cover letter to be filed by parties, can be found in Telecom Information Bulletin 2011-693.
27. Parties who wish to appear at the public hearing must provide reasons why their written intervention is not sufficient and why an appearance is necessary. In addition, parties requiring communications support must state their request for such support on the first page of their intervention.
28. Only those parties whose requests to appear have been granted will be contacted by the Commission and invited to appear at the hearing. An organization and conduct letter, providing directions on procedure with respect to the public hearing, will be issued before the hearing begins.
29. Although the public hearing will be held in **Gatineau, Quebec**, parties may participate from the Commission’s regional offices via videoconference. Parties interested in doing so are asked to indicate, at the time they file their interventions, the regional office where they wish to appear. A list of the Commission’s regional offices is included in this notice. In addition, the Commission will consider providing videoconference or teleconference links to other locations should it receive requests to do so.
30. Parties requiring communications support, such as assistive listening devices and sign language interpretation, are requested to confirm their specific requirements

with the Commission at least **20 days** before the public hearing begins so that the necessary arrangements can be made.

31. Following the hearing, all parties may file final submissions with the Commission on any matter within the scope of this proceeding by **20 November 2015**. Final submissions, including an executive summary, are not to exceed 15 pages.
32. The Commission encourages interested persons and parties to monitor the record of this proceeding, available on the Commission's website, for additional information that they may find useful when preparing their submissions.
33. Submissions longer than five pages should include a summary. Each paragraph of all submissions should be numbered, and the line *****End of document***** should follow the last paragraph. This will help the Commission verify that the document has not been damaged during electronic transmission.
34. Submissions must be filed by sending them to the Secretary General of the Commission using **only one** of the following means:

by completing the
[\[Intervention form\]](#)

or

by mail to
CRTC, Ottawa, Ontario K1A 0N2

or

by fax to
819-994-0218

35. Parties who send documents electronically must ensure that they will be able to prove, upon Commission request, that filing of a particular document was completed. Accordingly, parties must keep proof of the sending and receipt of each document for 180 days after the date on which the document is filed. The Commission advises parties who file documents by electronic means to exercise caution when using email for the service of documents, as it may be difficult to establish that service has occurred.
36. In accordance with the Rules of Procedure, a document must be received by the Commission and all relevant parties by 5 p.m. Vancouver time (8 p.m. Ottawa time) on the date it is due. Parties are responsible for ensuring the timely delivery of their submissions and will not be notified if their submissions are received after the deadline. Late submissions, including those due to postal delays, will not be considered by the Commission and will not be made part of the public record.

37. The Commission will not formally acknowledge submissions. It will, however, fully consider all submissions, which will form part of the public record of the proceeding, provided that the procedure for filing set out above has been followed.
38. The Commission expects to publish a decision on the issues raised in this notice within four months of the close of record.

Important notice

39. All information that parties provide as part of this public process, except information designated confidential, whether sent by postal mail, facsimile, email, or through the Commission's website at www.crtc.gc.ca, becomes part of a publicly accessible file and will be posted on the Commission's website. This includes all personal information, such as full names, email addresses, postal/street addresses, and telephone and facsimile numbers.
40. The personal information that parties provide will be used and may be disclosed for the purpose for which the information was obtained or compiled by the Commission, or for a use consistent with that purpose.
41. Documents received electronically or otherwise will be posted on the Commission's website in their entirety exactly as received, including any personal information contained therein, in the official language and format in which they are received. Documents not received electronically will be available in PDF format.
42. The information that parties provide to the Commission as part of this public process is entered into an unsearchable database dedicated to this specific public process. This database is accessible only from the web page of this particular public process. As a result, a general search of the Commission's website with the help of either its search engine or a third-party search engine will not provide access to the information that was provided as part of this public process.

Availability of documents

43. Electronic versions of the interventions and other documents referred to in this notice are available on the Commission's website at www.crtc.gc.ca by using the file number provided at the beginning of this notice or by visiting the "Participate" section of the Commission's website, selecting "Submit Ideas and Comments," then selecting "our open processes." Documents can then be accessed by clicking on the links in the "Subject" and "Related Documents" columns associated with this particular notice.
44. Documents are also available from Commission offices, upon request, during normal business hours.

Commission offices

Toll-free telephone: 1-877-249-2782

Toll-free TDD: 1-877-909-2782

Les Terrasses de la Chaudière
Central Building
1 Promenade du Portage, Room 206
Gatineau, Quebec J8X 4B1
Tel.: 819-997-2429
Fax: 819-994-0218

Regional offices

Nova Scotia

Metropolitan Place
99 Wyse Road, Suite 1410
Dartmouth, Nova Scotia B3A 4S5
Tel.: 902-426-7997
Fax: 902-426-2721

Quebec

505 De Maisonneuve Boulevard West, Suite 205
Montréal, Quebec H3A 3C2
Tel.: 514-283-6607

Ontario

55 St. Clair Avenue East, Suite 624
Toronto, Ontario M4T 1M2
Tel.: 416-952-9096

Manitoba

360 Main Street, Suite 970
Winnipeg, Manitoba R3C 3Z3
Tel.: 204-983-6306
Fax: 204-983-6317

Saskatchewan

1975 Scarth Street, Suite 403
Regina, Saskatchewan S4P 2H1
Tel.: 306-780-3422
Fax: 306-780-3319

Alberta

220 – 4th Avenue Southeast, Suite 574
Calgary, Alberta T2G 4X3
Tel.: 403-292-6660
Fax: 403-292-6686

British Columbia

858 Beatty Street, Suite 290
Vancouver, British Columbia V6B 1C1
Tel.: 604-666-2111
Fax: 604-666-8322

Secretary General

Related documents

- *Call for comments on a Television Service Provider Code of Conduct working document*, Broadcasting Notice of Consultation CRTC 2015-105, 26 March 2015, as amended by Broadcasting Notice of Consultation CRTC 2015-105-1, 15 May 2015
- *Let's Talk TV: Navigating the Road Ahead - Making informed choices about television providers and improving accessibility to television programming*, Broadcasting Regulatory Policy CRTC 2015-104, 26 March 2015
- *The Wireless Code*, Telecom Regulatory Policy CRTC 2013-271, 3 June 2013
- *CISC non-consensus report – Draft Deposit and Disconnection Code*, Telecom Decision CRTC 2011-702, 14 November 2011
- *Filing of joint supporting interventions*, Telecom Information Bulletin CRTC 2011-693, 8 November 2011
- *Review of the Commissioner for Complaints for Telecommunications Services*, Telecom Regulatory Policy CRTC 2011-46, 26 January 2011
- *Guidelines on the CRTC Rules of Practice and Procedure*, Broadcasting and Telecom Information Bulletin CRTC 2010-959, 23 December 2010
- *Review of the Commissioner for Complaints for Telecommunications Services – Decision on membership*, Telecom Decision CRTC 2010-921, 8 December 2010
- *Review of the Commission for Complaints for Telecommunications Services*, Telecom Notice of Consultation CRTC 2010-247, 30 April 2010, as amended by Telecom Notice of Consultation CRTC 2010-247-1, 12 August 2010

- *Applications to review and vary certain determinations in Telecom Decision 2007-130 regarding the establishment of an independent telecommunications consumer agency*, Telecom Decision CRTC 2008-46, 30 May 2008
- *Establishment of an independent telecommunications consumer agency*, Telecom Decision CRTC 2007-130, 20 December 2007
- *Proceeding to consider the organization and mandate of the Commissioner for Complaints for Telecommunications Services*, Telecom Public Notice CRTC 2007-16, 22 August 2007

Background

The Order in Council/Creation of the CCTS

1. The CCTS was established in 2007 by several TSPs¹² in response to [*Order requiring the CRTC to report to the Governor in Council on consumer complaints*](#), P.C. 2007-533, 4 April 2007 (the Order). In the Order, the Governor in Council considered that
 - an independent agency with a mandate to resolve complaints from individual and small business retail customers ("Consumer Agency") should be an integral component of a deregulated telecommunications market;
 - the mandate of an effective Consumer Agency should include, in addition to resolving complaints, developing or approving related industry codes of conduct and standards; publishing an annual report on the nature, number and resolution of complaints received for each TSP; and, as appropriate, identifying issues or trends that may warrant further attention by the Commission or the government;
 - the governance structure of an effective Consumer Agency should be designed to ensure its independence from the telecommunications industry by incorporating elements such as: a governing body composed of a majority of members who are not affiliated with any TSP; a chief executive officer appointed by the governing body and also not affiliated with any TSP; and a budget set by its governing body and provided by the industry at a level sufficient to effectively execute its mandate; and,
 - all TSPs should participate in, and contribute to the financing of, an effective Consumer Agency and that its structure and mandate would be approved by the Commission.
2. In Telecom Public Notice 2007-16, the Commission initiated a public proceeding to consider whether it should approve the structure and mandate of the CCTS.
3. In Telecom Decision 2007-130, the Commission
 - granted conditional approval to the CCTS's structure and mandate, subject to fulfilling certain conditions related to its governance, mandate, and remedies;

¹² See paragraph 3 of Telecom Decision 2007-130 for a list of the TSPs that established the Agency.

- determined that all TSPs with annual Canadian telecommunications service revenues exceeding \$10 million in the previous year were required to be members of the CCTS;¹³
 - requested that the CCTS revise its operating procedures to, among other things, improve the accessibility of its services to consumers and develop a comprehensive communications plan; and
 - determined that it would initiate a review of the CCTS within three years of the CCTS meeting the conditions of approval.
4. Then, in response to review and vary applications filed with respect to Telecom Decision 2007-130, the Commission, among other things, varied the mandatory membership requirement by applying an expiration date (20 December 2010) and by determining that the Commission would review the issue of mandatory membership on a *de novo* basis as part of its three-year review of the CCTS.¹⁴

CCTS's evolution

5. With the issuance of Telecom Notice of Consultation 2010-247, the Commission initiated a review of the structure and mandate of the CCTS as planned. This review resulted in the issuance of Telecom Decision 2010-921 and Telecom Regulatory Policy 2011-46.
6. In Telecom Decision 2010-921, the Commission required TSPs that offer services within the scope of the CCTS's mandate to be members of the CCTS for a period of five years. The Commission stated that all residential and small business consumers that obtain forborne telecommunications services in Canada, including those that receive services from TSPs that do not have more than \$10 million in revenues, should benefit from the services provided by the CCTS.
7. In Telecom Regulatory Policy 2011-46, the Commission imposed the following conditions of service on Canadian carriers in order to put into effect the above-mentioned membership determination with respect to TSPs who were not already members of the CCTS:
- as a condition of providing telecommunications service, all Canadian carriers are required to be members of the CCTS commencing five days after the date on which the CCTS informs the Canadian carrier that the CCTS has received a complaint about the Canadian carrier falling within the scope of the CCTS's mandate; and

¹³ This condition was imposed directly on carriers and indirectly on resellers by way of requiring carriers to include conditions in any contract with resellers.

¹⁴ See Telecom Decision 2008-46.

- as a condition of providing telecommunications service to any reseller, all Canadian carriers are required to include in their service contracts and other arrangements with such resellers the stipulation that any such reseller is required to be a member of the CCTS commencing five days after the date on which the CCTS informs the reseller that the CCTS has received a complaint about the reseller falling within the scope of the CCTS's mandate.

These conditions of service were to be in force for the period ending on 20 December 2015.

8. In Telecom Regulatory Policy 2011-46, the Commission also

- determined that the CCTS's governance structure and mandate were generally appropriate;
- expected that the CCTS (a) make specific modifications to its annual reports to improve the quality and transparency of the included data, and (b) report on, at a minimum, the top three trends in complaints each year in its future annual reports;
- found that the CCTS's remedies were appropriate; and,
- supported the CCTS's plans to increase public awareness.

Appendix 2

Questions for discussion in this proceeding

The service an independent communications ombudsman provides to consumers

The CCTS currently helps consumers with complaints about their phone, wireless and Internet services. Adding issues related to the provision of television services to the CCTS's mandate will provide consumers with a single point of contact for complaints about their communications services. As set out in the Commission's most recent *Communications Monitoring Report*, in 2013, 99% of Canadian households subscribed to telephone services; 85% subscribed to television services, and 79% subscribed to high-speed Internet services.

1. Comment on how an independent communications ombudsman serves the needs of consumers.
 - Address the service that it provides by resolving complaints about phone, wireless, and Internet services, reporting on these complaints, and administering related codes of conduct.
 - Address the service it would provide by resolving complaints about television services, reporting on these complaints, and administering related codes of conduct.

The consumer experience with the CCTS

2. The CCTS surveys customers who have used its services and [publishes the results](#) in order to obtain feedback on the quality of service it provided and to identify areas for improvement. Does the survey provide an effective and appropriate measurement of consumer satisfaction?
3. For consumers who have made a complaint with the CCTS, comment on your experience in using the CCTS for resolving your dispute.

Public awareness of the CCTS

For the CCTS to be fully effective, consumers must be aware of its existence and the assistance it can provide.¹⁵ While the CCTS accepted and concluded over 11,000 complaints in 2014-2015, public awareness of the CCTS appears to be limited.¹⁶

¹⁵ In the previous review of the CCTS in 2010-2011, the Commission supported the CCTS's commitment to implement further public awareness methods and considered that TSP participants should continue to use a variety of communications methods, such as directories, websites, and a standard notification on billing statements four times annually which should ultimately become a permanent, monthly notification.

The CCTS's website describes its [current approach to developing public awareness](#).

4. What measures, including online approaches, should the CCTS take to promote itself and increase public awareness of the CCTS?
5. Are there specific consumer segments where the CCTS should focus its promotional activities?
6. Are the current measures used by CCTS participants to promote the CCTS sufficient? If not, what additional measures could participants in the CCTS take to promote the Agency?
7. How could TVSPs promote the CCTS? Should TVSP participation be leveraged to promote the CCTS, such as by a requirement to broadcast public service announcements about the CCTS?
8. How should the effectiveness of these public awareness initiatives be measured?

Participation in the CCTS by communications service providers

The Commission currently requires all TSPs (including local and long distance service providers, wireless service providers, and Internet service providers) that provide services within the scope of the CCTS's mandate to participate in the CCTS. This requirement is set to expire on 20 December 2015.

For non-participant TSPs, the current membership requirement is triggered by a complaint. Specifically, a non-participant TSP that offer services within the scope of the CCTS is required to become a participant in the CCTS within five days of the date that the CCTS notifies it that the CCTS has received an in-scope complaint about it.

In Broadcasting Notice of Consultation 2015-105, the Commission stated that it intends to require all licensed TVSPs and related exempt undertakings to adhere to the TVSP Code which will be administered by the CCTS.

Telecommunications service providers

9. Should participation in the CCTS continue to be mandatory for all TSPs that provide services within the CCTS's mandate? Why or why not? Provide supporting rationale.
10. Should participation in the CCTS become immediately mandatory on a going-forward basis for small TSPs that are not currently CCTS participants (i.e. instead of the requirement being triggered by a complaint)?

¹⁶ In a July 2014 poll conducted by Harris Decima on behalf of the Commission concerning the Wireless Code, only 13% of respondents with cellphones indicated that they received information with their cellphone contract or agreement about how they could complain to the CCTS.

11. With the recent amendments to the *Telecommunications Act* that allow the Commission to directly impose conditions of service on resellers, should the requirement that TSPs participate in the CCTS be imposed directly on resellers on a going-forward basis?

Television service providers

12. Should participation in the CCTS be mandatory for all licensed TVSPs and related exempt undertakings? Why or why not? Provide supporting rationale.

CCTS's mandate

The CCTS's website provides a description of its primary [mandate](#). Its mandate includes tracking and reporting on trends in complaints and administering industry codes.

13. Does the CCTS's mandate remain appropriate with respect to the categories of complaints it can address about telecommunications services (i.e. compliance with contract terms, billing disputes and errors, service delivery, and credit management for telecommunications services and complaints related to codes of conduct that the CCTS administers)? Why or why not?
14. Should the CCTS address the same types of issues for consumers of services provided by TVSPs that it addresses for consumers of telecommunications services? Why or why not? What additional issues, if any, should it address?
15. Certain services associated with the telecommunications industry are excluded from the scope of the CCTS, such as alarm monitoring, telemarketing, and accessibility services. Are there specific services provided by TVSPs that should be excluded from the CCTS's mandate?

CCTS's structure

The CCTS's structure is set out in various documents including its Procedural Code and bylaws.¹⁷

16. Is the current structure of the CCTS's Board of Directors and the voting structure appropriate?
17. Should the CCTS change the structure of its Board of Directors to reflect the addition of television services to its mandate? If so, how and why?

¹⁷ By separate letter issued today, the CCTS is being requested to provide its Bylaws, Procedural Code, or other constating documents to the Commission by 20 July 2015 as part of the public record of this proceeding.

18. Should the CCTS change its voting structure to reflect the addition of TVSP participants and complaints related to the provision of television services to its mandate? If so, how and why?
19. Do the remedies provided by the CCTS to consumers as set out in its Procedural Code, including compensation up to \$5,000 per complaint, remain appropriate and sufficient to meet the needs of consumers of both telecommunications and television services?
20. Comment on whether any changes are required to the categories of complaints the CCTS reports on its annual and mid-year reports¹⁸ as a result of the addition of services provided by TVSPs to its mandate.
21. Are there other modifications to the CCTS structure that could make its operations more effective or efficient? If yes, describe the modifications and provide the rationale for their adoption.

CCTS's funding model

The CCTS describes its [funding model](#) on its website.

22. Is the CCTS's current funding model appropriate?
23. Should the CCTS change its funding model to reflect the addition of television services to its mandate? If so, how and why?

Future review

The Commission most recently reviewed issues related to the CCTS five years ago. The purpose of a review is to ensure that the Agency and related requirements continue to respond to consumers' needs in a rapidly changing environment.

24. What is the appropriate time frame for the next review of the CCTS?
25. Is the current [CCTS performance report](#) the appropriate framework for measuring the performance of the Agency? If not, what measures are appropriate and why?

¹⁸ The CCTS's annual reports are available on its website, which include its most recent annual report (2013-2014) and mid-year report (2014-2015).