



## Telecom Decision CRTC 2018-357

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Ottawa, 7 September 2018

*Public record: 8621-C12-01/08*

### **CRTC Interconnection Steering Committee – Non-consensus report 1540RE04 on the status of third-party Internet access installation orders and trouble tickets, and related process guidelines**

*The efficient delivery of wholesale high-speed access (HSA) services is essential to a competitive Internet access services market. Accordingly, consistent with the recommendations in a report by the CRTC Interconnection Steering Committee (CISC) Ad Hoc 1540 Wholesale High-speed Access Working Group, the Commission sets out determinations for the Cable Carriers regarding the delivery of wholesale HSA services.*

*In addition, the Commission requests CISC to update the proposed Guideline to incorporate the determinations set out in this decision, and publish the final Guideline applicable to all Cable Carriers within **90 days** of the date of this decision.*

*Finally, the Commission **directs** Cogeco, Eastlink, RCCI, Shaw, and Videotron to report to the Commission, **within six months** of the publication of the final Guideline, on (i) the state of progress in implementing the non-consensus and consensus items in the Guideline; and (ii) any technical or economic constraints to providing third-party Internet access (TPIA) Customers with same day or near real-time batch reporting, as required, including supporting rationale and a timeline for when same day or near real-time batch reporting can be provided to TPIA Customers.*

### **Background**

1. In 2013, the Canadian Network Operators Consortium Inc. (CNOC) requested changes with respect to the way in which a number of cable carriers<sup>1</sup> were providing wholesale high-speed access (HSA) services to CNOC,<sup>2</sup> to improve the quality of their wholesale HSA services.

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<sup>1</sup> Cable carriers referenced were Cogeco Cable Inc., Rogers Communications Partnership, Shaw Cablesystems G.P., and Videotron G.P.

<sup>2</sup> Wholesale HSA services offered by cable carriers are commonly referred to as “third-party Internet access (TPIA) services.” The services allow independent Internet service providers to provide Internet access to their end-users through cable modems that are connected to the cable carriers’ access and distribution networks and systems for the purposes of providing retail Internet and voice over Internet Protocol services.

2. This proceeding led to Telecom Decision 2015-40, in which the Commission considered that the efficient delivery of wholesale HSA services is essential to a competitive Internet access services market and noted that the cable carriers in question were willing to resolve seven of CNOC's proposed changes through the CRTC Interconnection Steering Committee (CISC) and/or bilateral discussions.<sup>3</sup> Accordingly, the Commission considered that allowing the industry to generate solutions was likely the most effective and efficient way to begin to resolve CNOC's concerns, and, as such, directed that items 1-3 set out in the Appendix of Telecom Decision 2015-40 be addressed through CISC, and that items 4-7 of the same Appendix be addressed through bilateral discussions.
3. The CISC Ad Hoc 1540 Wholesale High-speed Access Working Group (1540WG) was created to address three of the seven items referenced above, namely (i) the status of installation orders and trouble tickets, (ii) the trouble escalation process, and (iii) advance notice of network changes.

### **The report and process guidelines**

4. On 22 November 2017, the 1540WG submitted non-consensus report 1540RE04 – *Status of TPIA Installation Orders and Trouble Tickets* (the non-consensus report). This report addresses item 1, the status of installation orders and trouble tickets.<sup>4</sup>
5. Along with the non-consensus report, the 1540WG submitted guideline 1540GLTPIASOTT1 – *Process Guidelines for TPIA Service Orders and Trouble Tickets, Version 1* (the Guideline). The purpose of the Guideline is to update provisioning procedures<sup>5</sup> that were developed through the Cable Access (High Speed) CISC working group and are applicable to all Cable Carriers<sup>6</sup> providing wholesale HSA services.
6. The non-consensus report and the Guideline can be found under the “Reports” section of the 1540 Wholesale High-speed Access Working Group page, which is available under the CISC section of the Commission's website at [www.crtc.gc.ca](http://www.crtc.gc.ca).

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<sup>3</sup> See the Appendix of this decision for a list of the seven items referred to in paragraph 2 of this decision.

<sup>4</sup> The 1540WG intends to file the TPIA Network Management Guidelines, and a further non-consensus report, in the near future, to address issue 2 “trouble escalation process” and issue 3 “advance notice of network changes.”

<sup>5</sup> The provisioning procedures can be found under the “Reports” section of the page for the discontinued working group Cable Access (High Speed), which is available under the CISC section of the Commission's website at [www.crtc.gc.ca](http://www.crtc.gc.ca).

<sup>6</sup> The Cable Carriers are Bragg Communications Incorporated, carrying on business as Eastlink; Cogeco Communications Inc.; Rogers Communications Canada Inc.; Shaw Cablesystems G.P.; and Videotron Ltd.

7. The 1540WG requested that the Commission (i) make a determination on the non-consensus item identified in the non-consensus report, and (ii) approve the Guideline and the consensus recommendations made in the non-consensus report.

## **Issues**

8. The Commission has identified the following issues to be addressed in this decision:
  - What is the appropriate approach to report the status of service orders?
  - Should the Commission approve the 1540WG's proposals regarding the eight consensus items detailed in the report and as incorporated in the Guideline?

## **What is the appropriate approach to report the status of service orders?**

### **Background**

9. The 1540WG discussed what would be the appropriate timing to include in the Guideline for the Cable Carriers to report to third-party Internet access (TPIA) Customers on the status of orders, identifying whether a scheduled TPIA service order installation or activation was successful. 1540WG participants did not agree on the requirement to provide such reporting at the same interval for both TPIA Customers and a cable carrier's retail customer service.
10. Two proposals were submitted, a proposal from TPIA Customers (represented primarily by CNOC and TekSavvy Solutions Inc.) and, a proposal from certain Cable Carriers (represented by Cogeco Communications Inc. (Cogeco), Rogers Communications Canada Inc. (RCCI), Shaw Cablesystems G.P. (Shaw), and Videotron Ltd. (Videotron)) [collectively, referred to as Cogeco et al.].

### **TPIA Customers' positions and proposal**

11. TPIA Customers' specific concerns regarding the reporting of the status of service orders are as follows:
  - the Cable Carriers utilize different processes for providing the status of service orders, and the time frame in which the status of service orders is reported to TPIA Customers differs;
  - TPIA Customers do not receive the reporting of the status of service orders until at least 24 hours or longer after the scheduled service order;
  - TPIA Customers do not receive the reporting of the status of service orders on weekends or holidays;

- TPIA Customers are unable to proactively contact the end-users to advise them on (i) the outcome of the installation, (ii) the rescheduling of appointments if necessary, and (iii) any updates;
  - TPIA Customers are unable to correctly time the commencement of end-user billing, which coincides with the installation or activation of the service; and
  - TPIA Customers do not receive the reporting of the status of service orders at the same interval as the Cable Carriers' retail customer service.
12. TPIA Customers submitted that the lack of information as to whether service installations were successful or not (and may require rescheduling) is damaging to (i) the TPIA Customers' reputation, and (ii) their relationships with the end-users given that end-users expect their providers to have information regarding their service order status (e.g. service installation, service activation).
13. TPIA Customers stated that the degree of damage increases where a TPIA Customer is unable to provide information for longer than 24 hours after the scheduled service order date or on a weekend or holiday. They added that this situation creates significant disparities between service experiences provided by TPIA Customers relative to that provided by the Cable Carriers to their retail end-users.
14. To address these concerns, the TPIA Customers ultimately proposed the following approach:
- The Cable Carriers should report the status of orders to the TPIA Customer within an interval no longer than that by which the status of orders is made available to the Cable Carriers' retail customer service function – except that in no case shall that interval be later than the next day (including days which fall on weekends and holidays).
  - The Cable Carriers should be provided six months to implement the proposed approach.

### **Cogeco et al.'s positions and proposal**

15. Cogeco et al. did not dispute the need for reporting on the status of installation appointments but submitted that it would be inappropriate to create a reporting requirement for wholesale HSA services that is based upon the Cable Carriers' internal retail processes. They added that the TPIA Customers' proposal does not appropriately accommodate differences between wholesale and retail processes, raises issues of interpretation, and ignores technical challenges.
16. Cogeco et al. indicated that they use different methods and timing intervals to provide TPIA Customers with status reports on service orders. For example,

- Videotron provides email status within 24 to 48 hours of completion of the TPIA service order;
  - RCCI is investigating “next day” reporting;
  - Shaw provides batch reporting to TPIA Customers within 24 to 48 hours; and
  - certain Cable Carriers (e.g. Shaw) have designed company-specific systems, which at times require manual processing to provide the status of specific service orders to the TPIA Customers.
17. Cogeco et al. further submitted that the information systems and processes used to manage TPIA Customer service orders (e.g. service installations, service activations) are often different than the information systems and processes used in managing retail orders. Cogeco et al. stated that they do not generally use any type of internal reporting to determine the status of installation appointments for their own retail services.
18. In light of the above, Cogeco et al. proposed the following approach:
- At a minimum, the Cable Carriers will provide next day batch reporting to a TPIA Customer. A batch report on the status of orders should be provided to the TPIA Customer the day following the day on which the order/installation completion is scheduled (including when that day falls on a weekend or holiday).
  - The Cable Carriers should look to provide TPIA Customers with same day or near real-time batch reporting when technically or economically feasible. This could include a report to the TPIA Customer by the end of day on which the order/installation completion date is scheduled or near real-time reporting such as batch reporting at the end of scheduled order/installation completion windows.
  - If any Cable Carrier develops a real-time reporting tool, the availability of that tool would eliminate the need for the Cable Carrier to provide batch reporting to the TPIA Customer.
19. Cogeco et al. submitted that their proposal achieved three goals: (i) it sets a minimum reporting requirement, (ii) it outlines an objective for the Cable Carriers to meet when technically or economically feasible, and (iii) it allows sufficient flexibility for the Cable Carriers to develop approaches, systems, and responsive solutions. Cogeco et al. submitted that they would require six months to implement their proposed solution.

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

20. Both proposals outline a minimum next day reporting interval, address the majority of the TPIA Customers' concerns regarding the reporting of the status of service orders, and would improve the delivery of the Cable Carriers' wholesale HSA services. They diverge solely on the requirement to provide reporting on order status at the same interval as the Cable Carriers' retail customer service.
21. The Commission considered (i) the appropriateness of comparing the reporting of retail and wholesale service orders, and (ii) the degree of harm affecting the TPIA Customers or their end-users that would occur from next day reporting versus reporting at the same interval as the Cable Carriers' retail customer service. The Commission considered these issues in light of the determination in Telecom Decision 2015-40 that the efficient delivery of wholesale HSA services is essential to a competitive Internet access services market.
22. Cogeco et al. stated that their retail customer service function, to the extent that there is an order status reporting function, uses different information systems and processes than those used in providing wholesale services. In their view, this results in technical challenges to synchronize these information systems and processes. In view of these challenges, Cogeco et al. have proposed to look to provide TPIA Customers with same day or near real-time batch reporting when technically or economically feasible. In the immediate term, they proposed to provide, at a minimum, next day batch reporting to a TPIA Customer.
23. There is insufficient information on the record of this CISC report for the Commission to determine the feasibility of synchronizing these information systems and processes or scope of the work or costs required to synchronize these information systems and processes. It would not be appropriate at this time to require the Cable Carriers to report to TPIA Customers the status of service orders within the same interval as a cable carrier's retail customer service function to the extent that they use different information systems and processes for each. The Commission has not established a requirement that the reporting intervals be the same. Doing so is beyond the scope of the Commission's consideration of the 1540WG's proposals in the non-consensus report and the Guideline.
24. Regarding the degree of harm affecting TPIA Customers that would occur from next day batch reporting versus reporting at the same interval (batch or otherwise) as the Cable Carriers' retail customer service, the Commission notes that (i) the TPIA Customers submitted that their end-users, in particular for orders that did not require entry into the premise, do not know the status of their order; (ii) the degree of harm to a TPIA Customer's reputation and the relationship between the TPIA Customer and the end-user increases where a TPIA Customer is unable to provide the status of order information for longer than 24 hours after the scheduled service installation or activation date or on a weekend or holiday; and (iii) the TPIA Customers proposed a minimum reporting period of next day.

25. By providing at least next day batch reporting to a TPIA Customer, including on weekends and holidays, the degree of harm to TPIA Customers or their end-users is mitigated significantly and meets the TPIA Customers' minimum reporting period proposed.
26. In light of the above, Cogeco et al.'s proposal resolves the majority of the TPIA Customers' concerns, meets the minimum reporting interval proposed by TPIA Customers, sets future goals of addressing the concern of providing the reporting of the status of service orders to TPIA Customers within the same day or in near real-time when technically or economically feasible, and is in accordance with the Commission's determination to ensure the efficient delivery of wholesale HSA services, set out in Telecom Decision 2015-40.
27. In light of the above, the Commission
- **approves** Cogeco et al.'s proposal for providing, at a minimum, next day batch reporting to be implemented by all Cable Carriers within six months of the publication of the final Guideline;
  - requests that CISC update the proposed Guideline to incorporate the determinations set out in this decision, and publish the final Guideline applicable to all Cable Carriers within 90 days of the decision; and
  - **directs** Cogeco, Eastlink, RCCI, Shaw, and Videotron to report to the Commission, **within six months** of the publication of the final Guideline, on (i) the state of progress in implementing the non-consensus item in the Guideline; and (ii) any technical or economic constraints to providing TPIA Customers with same day or near real-time batch reporting, including supporting rationale and a timeline for when same day or near real-time batch reporting can be provided to TPIA Customers.

**Should the Commission approve the 1540WG's proposals regarding the eight consensus items detailed in the report and as incorporated in the Guideline?**

28. The 1540WG identified eight items, whereby the working group met to discuss the concerns raised, openly discussed activities surrounding the concerns raised, promoted open dialogue, shared respective views, and reached consensus on a resolution for each of the eight consensus items. Each of these consensus items is addressed below.

**Service Order Initiation – Address Verification**

29. On this issue, the 1540WG recommended that
- the Cable Carriers use Municipal Street Address Guidelines data where possible and/or provide an address verification tool;

- service order and rejection processes comparable to those contained in the Canadian Local Ordering Guidelines (C-LOG) be adopted by Cable Carriers and TPIA Customers;
- TPIA Customers obtain and confirm residence information with their end-users (e.g. whether the residence is a single-family dwelling, whether the residence has separate units, whether the residence is a multi-dwelling unit) to ensure that the address and applicable unit information is complete; and
- regarding issues arising from the unit information component of an end-user's service address:
  - in cases where the unit number is missing on the service order and the unit number is in a large multi-dwelling unit, the service order should be rejected; and
  - in cases where a minor clarification is required, such as where the unit number contained in a TPIA service order differs from the Cable Carrier's address information or where clarification on unit information in a smaller building is required (e.g. single-family dwelling with downstairs/upstairs units), the TPIA Customer and Cable Carrier should have a process for treating rejections (i.e. an escalation contact between the Cable Carrier and TPIA Customer) to clarify the address information.

#### **Service Order Initiation – Interaction with Canadian Local Ordering Guidelines Service Cancellation Request Process**

30. On this issue, the 1540WG recommended that

- the Cable Carriers follow the TPIA service transfer order processes illustrated in the *Process Guidelines for TPIA Service Orders and Trouble Tickets*, Version 1, Appendix B – Process for Service Cancellation on Behalf of an End-User; and
- the Cable Carriers revise their TPIA Service Agreement wording to reflect the TPIA service transfer order processes.

#### **Service Order Status - Alignment of Service Intervals for New Orders Across Cable Carriers**

31. On this issue, the 1540WG recommended that

- the Cable Carriers adhere to the requirement to respond to a service order within two business days.



### **Service Order Rescheduling – Generic Door Hangers for Nobody Home**

32. On this issue, the 1540WG recommended that

- when the Cable Carrier leaves a door hanger in “nobody home” situations during a TPIA Customer service installation, then the door hanger should be generic and exclude the Cable Carrier branding.

### **Service Order Rescheduling – Rescheduling Procedures when Nobody Home or Installation Failure**

33. On this issue, the 1540WG recommended that

- the reporting of the status of service orders (that includes the reporting of unsuccessful service installations and activations) will be addressed by the resolution of the non-consensus item (discussed in detail above); and
- the Cable Carriers will adhere to the proposed Guideline that requires reschedule requests to be processed in an expedited manner equivalent to the comparable requirement contained in the C-LOG and allows the Cable Carrier to contact the TPIA Customer’s end-user directly to reschedule an installation appointment.

### **Trouble Ticket Status – Alignment of Processes and Service Intervals for End-User Trouble Tickets Across Cable Carriers**

34. On this issue, the 1540WG recommended that

- the Cable Carriers respond to a trouble ticket within 24 hours of its submission and provide all information they have available at that time (e.g. cause of issue, estimated time of completion for resolution); and
- in cases where the Cable Carrier is unable to provide information such as cause of the issue or an estimated time of completion for resolution in its first response, the Cable Carrier provide an updated response to the trouble ticket when that information becomes available.

### **Cancelling a Request for Service Disconnection**

35. On this issue, the 1540WG recommended that

- the Cable Carriers abide by the updated process in the proposed Guideline that allows a TPIA Customer to request a cancellation of an order that it has submitted to the underlying Cable Carrier to disconnect service, provided the request is submitted no later than two business days prior to the scheduled or requested disconnection.

## Modernizing the Language in the Proposed Guideline

36. On this issue, the 1540WG recommended that

- the wording of the Guideline be updated as agreed upon by the Cable Carriers and the TPIA Customers; and
- where there are differences between the wording in the Cable Carriers' TPIA Service tariffs and the Guideline, the wording in the Cable Carriers' TPIA Service tariffs take precedence, as agreed upon by the Cable Carriers and the TPIA customers.

## Commission's analysis and determinations

37. In Telecom Decision 2015-40, the Commission noted that parties acknowledged that the delivery of the Cable Carriers' wholesale HSA services can be improved and directed the industry to generate solutions through CISC. The Commission further determined that the efficient delivery of wholesale HSA services is essential to a competitive Internet services market.

38. The Commission considers that the eight proposed consensus items, as set out in the report, will improve the delivery of the Cable Carriers' wholesale HSA services and are in accordance with the Commission's directions set out in Telecom Decision 2015-40. Accordingly, the Commission **approves** the eight consensus items as proposed and as incorporated in the Guideline.

39. Further, the Commission **directs** Cogeco, Eastlink, RCCI, Shaw, and Videotron to report to the Commission, **within six months** of the publication of the final Guideline, their progress in implementing the consensus items proposed in the Guideline.

## Potential overlap with Telecom Regulatory Policy 2018-123

40. Concurrent with the work of the 1540WG, the Commission has reviewed its competitor quality of service regime, resulting in Telecom Regulatory Policy 2018-123.

41. In Telecom Regulatory Policy 2018-123, the Commission determined, among other things, that additional regulatory oversight is appropriate for all providers (including cable carriers) of both aggregated and disaggregated wholesale HSA services, and that these services should be included in a competitor quality of service regime. The indicators of the quality of service regime for wholesale HSA services must be determined through additional process. The Commission also directed wholesale HSA providers to track and provide it with a report of information on (i) HSA installation appointments met and (ii) HSA repair appointments met, as well as average timelines for installations and repairs, on both a company-wide and a competitor-specific basis. The Commission also directed CISC to, among other things, explore the development of, and propose, interval targets for the average

timelines for wholesale HSA installations and repair appointments, by 15 October 2018.

42. The items to be determined through additional process, including the work assigned to CISC, as set out in Telecom Regulatory Policy 2018-123 may overlap with some aspects of the proposed *Process Guidelines for TPIA Service Orders and Trouble Tickets*. The Guideline includes notification periods and service intervals related to service order installations, and the quality of service regime will track, among other data, information regarding the average installation and repair intervals for wholesale HSA service. The extent of this overlap, if any, and consequences thereof, will be determined during the process when the Commission reviews the findings submitted by CISC, in October 2018.
43. In view of this potential overlap, the Commission notes that the determinations herein on the non-consensus report and Guideline does not preclude the CISC quality of service working group or the Commission, in response to the CISC report, from reviewing and making further determinations on these issues again.

Secretary General

#### **Related documents**

- *Review of the competitor quality of service regime*, Telecom Regulatory Policy CRTC 2018-123, 13 April 2018
- *Canadian Network Operators Consortium Inc. – Application to improve the quality of wholesale high-speed access services provided by cable carriers to independent Internet service providers*, Telecom Decision CRTC 2015-40, 12 February 2015

## **Appendix to Telecom Decision CRTC 2018-357**

### **Items to be resolved through CISC or bilateral discussions**

<b>Item #</b>	<b>Description</b>
1	Status of installation orders and trouble tickets
2	Trouble escalation process
3	Advance notice of network changes
4	TPIA [third-party Internet access] service sign-up process
5	Mistaken disconnections due to inconsistent tagging of TPIA cable connections
6	Network safeguards (Bidirectional Forward Detection)
7	Internet Protocol address allocation and usage reports