



Broadcasting and Telecom Notice of Consultation CRTC 2020-81

PDF version

Ottawa, 3 March 2020

Public record: 1011-NOC2020-0081

Call for comments – Provision of paper bills by communications service providers

Deadline for submission of interventions: 4 May 2020

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

As many communications service providers transition from paper billing to electronic billing, the Commission seeks to obtain a better understanding of whether and in what circumstances Canadians should receive paper or electronic bills. In this proceeding, the Commission will determine whether intervention is warranted in regard to the billing practices of telecommunications service providers and broadcasting distribution undertakings, and, if so, what steps should be taken to meet the needs of consumers.

Background

1. In recent years, telecommunications service providers (TSPs) and broadcasting distribution undertakings (BDUs) [collectively referred to as communications service providers] have taken various approaches to encourage customers to transition from paper to electronic billing (e-billing). Prior to December 2014, these approaches included charging fees for the issuance of paper bills or providing discounts to customers who opt for e-billing.
2. On 16 December 2014, the *Telecommunications Act* and the *Broadcasting Act* were amended to prohibit communications service providers from charging fees for the issuance of paper bills.
3. Currently, while the Commission requires that bills be provided in alternative accessible formats, such as in Braille or large print, for customers with certain accessibility needs,¹ it does not otherwise mandate the format in which bills are to be provided.

¹ See Telecom Order 98-626, Order 2001-690, Telecom Decision 2002-13, Broadcasting and Telecom Regulatory Policy 2009-430, and Telecom Regulatory Policy 2017-11.

4. On the record of the proceeding that resulted in the Commission's [*Report on Misleading or Aggressive Communications Retail Sales Practices*](#),² some Canadians expressed concerns, among other things, related to the trend of communications service providers transitioning from paper billing to e-billing.
5. In Telecom Decision 2020-80, also issued today, the Commission denied a request by the Public Interest Advocacy Centre (PIAC) and the National Pensioners Federation (NPF) [collectively, PIAC-NPF] to require Koodo Mobile (Koodo) and other wireless service providers (WSPs) to provide paper bills upon request and at no charge. The Commission found that there was no existing legislative or regulatory obligation that mandated the provision of paper bills and, since the rationale and evidence on the record of that proceeding related largely to Koodo alone, it would not be in the public interest to create a new obligation that would affect all WSPs based solely on that record.
6. In Telecom Decision 2020-80, the Commission acknowledged that digital service innovation and price competition are important factors in the overall market. However, the Commission also noted the following with respect to consumers:
 - PIAC-NPF's application raised concerns about the need for vulnerable consumers to have access to paper bills;
 - the concerns raised in PIAC-NPF's application and other complaints that the Commission has received may be a sign that there are wider concerns with paper billing in general; and
 - it is important to ensure that Canadians are able to receive clear information about their bills in an appropriate format.
7. The Commission, therefore, must develop an understanding of consumers' needs.

Call for comments

8. In light of the above, the Commission hereby initiates a public proceeding to examine the issue of the provision of paper bills. Since (i) the Commission has addressed issues with respect to billing in similar ways for both telecommunications and broadcasting services, and (ii) section 27.2 of the *Telecommunications Act* and section 34.1 of the *Broadcasting Act* set out similar prohibitions against charging for paper bills, the scope of this proceeding includes both telecommunications and broadcasting services.
9. The Commission is specifically seeking comments on
 - whether there is a need for Canadians or certain groups of Canadians to continue to receive paper bills;

² That proceeding was initiated by Telecom and Broadcasting Notice of Consultation 2018-246.

- whether Commission intervention is appropriate and warranted with respect to the paper billing practices of TSPs and BDUs;
 - if Commission intervention is appropriate and warranted, what measures, if any, the Commission should impose with respect to paper billing practices; and
 - to whom and how any new obligations should apply.
10. In order to ensure that the Commission has the factual record necessary to make a determination, and to assist parties in formulating their interventions, the dominant communications service providers in the Canadian market, namely Bell Canada, Bragg Communications Incorporated, Cogeco Communications inc., Quebecor Media Inc., Rogers Communications Canada Inc., Saskatchewan Telecommunications, Shaw Communications Inc., TBayTel, TekSavvy Solutions Inc., TELUS Communications Inc., and Xplornet Communications Inc., must file responses to the request for information set out in the Appendix to this notice by **2 April 2020**.
11. Each of the above-noted companies' responses must address its practices as a TSP and/or a BDU, as well as the practices of any subsidiaries.
12. The Commission encourages other communications service providers to file responses to the request for information set out in the Appendix to this notice by **2 April 2020**.
13. In order for the Commission to develop an understanding of consumers' needs, individual Canadians, including persons with disabilities, as well as organizations representing the interests of consumers in general and organizations concerned with accessibility issues, are encouraged to respond to the following questions as part of their interventions:
- a) Describe in detail, with supporting rationale, what your needs are with regard to billing formats. Provide any available evidence of these needs.
 - b) Do the billing formats provided by communications service providers meet your needs? If not, explain why and what you are required to do to pay your bill despite the current bill formats not meeting your needs.
 - c) What billing formats would best meet your needs?

Procedure

14. 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, answers, replies, and requests for information; the procedure for filing confidential information and requesting its disclosure; and the conduct of

public hearings. Accordingly, the procedure set out below must be read in conjunction with the Rules of Procedure and related documents, which can be found on the Commission's website at www.crtc.gc.ca, under "[Statutes and regulations](#)." The guidelines 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.

15. The responses to the request for information must be filed with the Commission by **2 April 2020**.
16. Interested persons, including the parties named in paragraph 10, must file an intervention with the Commission regarding the above-noted issues by **4 May 2020**. Interventions must be filed in accordance with section 26 of the Rules of Procedure.
17. Parties are permitted to coordinate, organize, and file, in a single submission, interventions by other interested persons who share their position. 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.
18. All documents required to be served on parties to the proceeding must be served using the contact information contained in the interventions.
19. All parties may file replies to interventions with the Commission by **25 May 2020**.
20. The Commission encourages interested persons and parties to monitor the record of this proceeding, available on the Commission's website at www.crtc.gc.ca, for additional information that they may find useful when preparing their submissions.
21. 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.
22. Pursuant to Broadcasting and Telecom Information Bulletin 2015-242, the Commission expects incorporated entities and associations, and encourages all Canadians, to file submissions for Commission proceedings in accessible formats (for example, text-based file formats that enable text to be enlarged or modified, or read by screen readers). To provide assistance in this regard, the Commission has posted on its website [guidelines](#) for preparing documents in accessible formats.
23. 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

24. Parties who send documents electronically must ensure that they will be able to prove, upon Commission request, that filing, or where required, service 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 or served. The Commission advises parties who file or serve 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.
25. 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.
26. 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.

Important notice

27. All information that parties provide as part of this public process, except information designated confidential, whether sent by postal mail, fax, 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 fax numbers.
28. 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.
29. 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.
30. 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

31. 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 public record number provided at the beginning of this notice or by visiting the "Consultations and hearings – Have your say!" section, then selecting "our applications and processes that are open for comment." Documents can then be accessed by clicking on the links in the "Subject" and "Related Documents" columns associated with this particular notice.
32. Documents are also available at the following address, upon request, during normal business hours.

Les Terrasses de la Chaudière
Central Building
1 Promenade du Portage
Gatineau, Quebec
J8X 4B1

Tel.: 819-997-2429

Fax: 819-994-0218

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

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

Secretary General

Related documents

- *Public Interest Advocacy Centre and National Pensioners Federation – Application regarding paper billing by Koodo Mobile*, Telecom Decision CRTC 2020-80, 3 March 2020
- *Report regarding the sales practices of Canada's large telecommunications carriers*, Telecom and Broadcasting Notice of Consultation CRTC 2018-246, 16 July 2018; as amended by Telecom and Broadcasting Notice of Consultation CRTC 2018-246-1, 16 October 2018
- *Application of regulatory obligations directly to non-carriers offering and providing telecommunications services*, Telecom Regulatory Policy CRTC 2017-11, 17 January 2017; as amended by Telecom Regulatory Policies CRTC 2017-11-1, 10 July 2017; and 2017-11-2, 17 July 2018
- *Filing submissions for Commission proceedings in accessible formats*, Broadcasting and Telecom Information Bulletin CRTC 2015-242, 8 June 2015

- *Filing of joint supporting interventions*, Telecom Information Bulletin CRTC 2011-693, 8 November 2011
- *Guidelines on the CRTC Rules of Practice and Procedure*, Broadcasting and Telecom Information Bulletin CRTC 2010-959, 23 December 2010
- *Accessibility of telecommunications and broadcasting services*, Broadcasting and Telecom Regulatory Policy CRTC 2009-430, 21 July 2009; as amended by Broadcasting and Telecom Regulatory Policy CRTC 2009-430-1, 17 December 2009
- *Extending the availability of alternative formats to consumers who are blind*, Telecom Decision CRTC 2002-13, 8 March 2002
- *Alternative formats for a person who is blind*, Order CRTC 2001-690, 31 August 2001
- Telecom Order CRTC 98-626, 26 June 1998

Appendix to Broadcasting and Telecom Notice of Consultation CRTC 2020-81

Request for information

The following questions are addressed to the communications service providers listed in paragraph 10 above. Separate responses should be provided for each communications service provider's main brand and its subsidiaries. Responses should also be provided for each of the separate lines of business operated by the communications service provider, e.g. wireless, Internet, local telephone, or broadcasting distribution services.

- Q1. Identify all formats of bills that your company is currently providing to its customers.
- Q2. What is your company's policy with respect to paper bills? Does your company make paper bills available to all customers either automatically or upon request? If not,
- a) in what circumstances and to what segment of customers does your company provide paper bills upon request?
 - b) how does your company assess the needs of customers to determine which billing formats it will provide? Provide details, including criteria that a customer service representative would need to consider.
 - c) did your company consult with persons with disabilities to understand their specific needs with respect to billing?
 - d) how does your company handle billing for customers who do not have mobile Internet or home broadband Internet access?
- Q3. With respect to customers with accessibility needs, does your company limit the provision of paper bills to persons who are blind or partially sighted, or does it also provide paper bills, upon request, to persons with other accessibility needs, such as persons with intellectual or cognitive disabilities, who may have challenges accessing bills in an online format? If it does not provide paper bills for persons with other accessibility needs, explain why not and how the needs of these individuals are being accommodated.
- Q4. Does your company's online customer portal meet the World Wide Web Consortium (W3C) Web Content Accessibility Guidelines (WCAG) 2.0 standards? Provide any accessibility and usability assessments that were undertaken to confirm that your company's online customer portal meets these standards.