



Telecom Notice of Consultation CRTC 2024-295

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Ottawa, 22 November 2024

Public record: 1011-NOC2024-0295

Call for comments – Making it easier to choose a wireless phone or Internet service – Enhancing self-service mechanisms

Deadline for submission of interventions: 9 January 2025

Deadline for submission of replies: 24 January 2025

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

Summary

The Commission is launching three public proceedings to help Canadians better manage their cellphone and Internet service plans.

The Commission is building on existing protections to make it easier for Canadians to make changes to their plans.

Canadians need simple and convenient self-service mechanisms to modify, right-size, or cancel their plans.

The Commission has put in place different ways to protect Canadians in the Wireless Code and the Internet Code, and this public proceeding is another step in giving Canadians more control over the services they receive.

In this notice, the Commission is seeking comments on how to ensure that wireless phone and Internet service providers offer Canadians ways to make changes to their cellphone and Internet service plans by themselves (self-service mechanisms). A complete list of questions can be found in the appendix to this notice.

Additionally, important information on how interested persons can participate in this proceeding can be found [below](#).

This is one of three proceedings launched today that address amendments to the *Telecommunications Act* set out in Division 37 of *An Act to implement certain provisions of the budget tabled in Parliament on April 16, 2024*. The other two proceedings are Telecom Notices of Consultation 2024-293 and 2024-294.

Introduction

Why we are launching this proceeding

1. The Commission is launching this proceeding to determine how it can amend the [Wireless Code](#)¹ and the [Internet Code](#)² (the Consumer Protection Codes) by requiring the provision of self-service mechanisms in a way that would be useful to Canadians.
2. This proceeding also addresses the amendments to the *Telecommunications Act* (the Act) set out in *An Act to implement certain provisions of the budget tabled in Parliament on April 16, 2024*. These amendments require the Commission to impose the provision of self-service mechanisms that allows Canadians to cancel or modify their plans.
3. This proceeding helps advance the work that the Commission is doing to enhance consumer protections.

What we are examining

4. The Commission has put in place different ways to protect Canadians in the Consumer Protection Codes, which help guide the relationship between telecommunications service providers (service providers) and their customers.
5. This proceeding will help build on those consumer protections by making it easier for Canadians to modify or cancel their plans through self-service mechanisms.
6. To better understand the self-service mechanisms that are currently available, Commission staff issued a request for information on 23 July 2024 asking service providers for more details on current self-service mechanisms, including their accessibility for persons with disabilities. The responses received on 23 August 2024 have been added to the [record of this proceeding](#).

Call for comments

7. In light of the above, the Commission is seeking comments on the following issues, as detailed in the appendix to this notice:
 - what self-service functions, and what information about using them, do Canadians need;
 - how should Canadians be able to access self-service mechanisms and whether self-service mechanisms should be allowed to entirely replace other ways Canadians can cancel or modify their contracts;

¹ See Telecom Regulatory Policies 2013-271 and 2017-200.

² See Telecom Regulatory Policy 2019-269.

- how to ensure that persons with disabilities can fully access self-service mechanisms;
 - whether the Commission should limit or prohibit potential fees that may be charged to Canadians for using any type of service;
 - how to ensure confidential customer information is handled in a way that is consistent with existing privacy rules where machine learning, generative artificial intelligence, or similar technology is incorporated into existing self-service mechanisms; and
 - whether any specific service providers or classes of service providers should be exempt from the requirement to offer self-service mechanisms.
8. The Commission's decisions must advance the policy objectives set out in section 7 of the Act. This proceeding addresses two of those objectives. The Commission aims:
- to facilitate the orderly development throughout Canada of a telecommunications system that serves to safeguard, enrich and strengthen the social and economic fabric of Canada and its regions (paragraph 7(a)); and
 - to respond to the economic and social requirements of users of telecommunications services (paragraph 7(h)).
9. In making decisions, the Commission must also implement the [2023 Policy Direction](#).³ It emphasizes that the Commission should consider how its decisions enhance and protect the rights of consumers,⁴ including taking measures to ensure that consumers can promptly, affordably, and easily cancel, downgrade, transfer, or otherwise change their services.⁵

Out-of-scope issues

10. This proceeding is limited to examining the issues outlined in paragraph 7 and detailed in the appendix to this notice. For greater clarity, the following issues are outside the scope of this proceeding and will not be considered by the Commission, unless they are directly related to the above-mentioned consumer protection requirements:
- rates and competitiveness of the marketplace;

³ *Order Issuing a Direction to the CRTC on a Renewed Approach to Telecommunications Policy*, SOR/2023-23, 10 February 2023

⁴ See paragraph 2(d).

⁵ See subparagraph 17(b)(iv).

- false advertising;
- availability of specific service features, services, or bundles of services;
- privacy obligations of service providers under the *Personal Information Protection and Electronic Documents Act*; and
- other changes to the Consumer Protection Codes that are unrelated to customer service mechanisms.

What you need to know to participate in this proceeding

Procedure

11. The [Canadian Radio-television and Telecommunications Commission \[CRTC\] Rules of Practice and Procedure](#) (the Rules of Procedure) apply to this proceeding. The Guidelines on the CRTC Rules of Practice and Procedure (Broadcasting and Telecom Information Bulletin 2010-959) are meant to help members of the public understand the Rules of Procedure so that they can more effectively participate in Commission proceedings.

Submitting an intervention

12. The Commission invites comments that address the issues and questions set out above and in the appendix to this notice. The Commission will accept comments that it receives no later than **9 January 2025**.⁶
13. Interested persons who require assistance submitting comments can contact the Commission's Hearings & Public Proceedings group at hearing@crtc.gc.ca.
14. Interested persons who file an intervention automatically become a party to this proceeding. Only parties to the proceeding can participate in further stages of the proceeding.
15. Submissions must be filed by sending them to the Secretary General of the Commission using only one of the following means:
 - completing the Commission's [intervention form](#);
 - sending a fax to 819-994-0218; or
 - writing by mail to CRTC, Ottawa, Ontario K1A 0N2.

⁶ For the computation of all time periods set out in this notice, as indicated in section 12 of the [Canadian Radio-television and Telecommunications Commission Rules of Practice and Procedure](#), the period beginning on 21 December in one year and ending on 7 January in the following year must not be included.

16. Submissions longer than five pages should include a summary. Submissions will be posted in the official language and format in which they are received.
17. The deadline to submit an intervention to the Commission is 5 p.m. Vancouver time (8 p.m. Ottawa time). 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 will not be considered by the Commission and will not be made part of the public record.

Submitting a reply

18. Parties can file replies with the Commission by **24 January 2025**. Their replies can address any matters on the record of the proceeding.

Privacy notice

19. Please note the following:

- Documents will be posted on the Commission's website exactly as received. This includes any personal information contained in them, such as full names, email addresses, postal/street addresses, and telephone and fax numbers.
- All personal information parties provide as part of this public proceeding, except information designated as confidential, will be posted on the Commission's website and can be accessed by others.
- However, the information parties provide can only be accessed from the webpage of this particular public proceeding. As a result, a general search of the Commission's website using 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 proceeding.
- 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.

Confidentiality

20. The Commission's proceedings are designed to allow members of the public to provide input so that it can make better, more informed decisions. As a result, the general rule is that all information filed with the Commission is placed on the public record and can be reviewed by all parties and members of the public.
21. However, the Commission also often needs detailed information from the companies it regulates and supervises to make an informed decision. This information can be commercially sensitive, especially as the environment in which the companies operate becomes more competitive. The Commission will therefore accept certain information as confidential.

22. Parties can request that information be filed in confidence under subsection 39(1) of the Act with a detailed rationale as to why that information should be considered confidential. The Commission reminds parties that make such a request that when a document is filed with confidential information, an abridged version must also be filed so that it can be included in the public record.

Accessible formats for people with disabilities

23. The Commission requires regulated entities and encourages all parties to file submissions in accessible formats (for example, text-based file formats that enable text to be enlarged or modified or read by screen readers) for this proceeding. To help in this regard, the Commission has posted on its website [guidelines](#) for preparing documents in accessible formats.

24. If submitted documents have not been filed in accessible formats, you can contact the Commission's Hearings & Public Proceedings group at hearing@crtc.gc.ca to request that Commission staff obtain those documents in accessible formats from the party that originally submitted the documents in question.

Accessing documents

25. Links to interventions, as well as other documents referred to in this notice, are available on the Commission's "[Consultations and hearings: have your say](#)" page.

26. Documents are available upon request during normal business hours by contacting:

Documentation Centre
Examinationroom@crtc.gc.ca
Tel.: 819-997-4389
Fax: 819-994-0218

Client Services
Toll-free telephone: 1-877-249-2782
Toll-free TTY: 1-877-909-2782

27. Interested persons can find electronic versions of the documents by clicking on "[\[Submit an intervention or view related documents\]](#)" at the top of this notice.

Secretary General

Related documents

- *Call for comments – Making it easier to choose a wireless phone or Internet service – Removing barriers to switching plans*, Telecom Notice of Consultation CRTC 2024-294, 22 November 2024

- *Call for comments – Making it easier to choose a wireless phone or Internet service – Enhancing customer notification*, Telecom Notice of Consultation CRTC 2024-293, 22 November 2024
- *The Internet Code*, Telecom Regulatory Policy CRTC 2019-269, 31 July 2019; as amended by Telecom Regulatory Policy CRTC 2019-269-1, 9 August 2019
- *Review of the Wireless Code*, Telecom Regulatory Policy CRTC 2017-200, 15 June 2017
- *The Wireless Code*, Telecom Regulatory Policy CRTC 2013-271, 3 June 2013
- *Guidelines on the CRTC Rules of Practice and Procedure*, Broadcasting and Telecom Information Bulletin CRTC 2010-959, 23 December 2010



Appendix to Telecom Notice of Consultation CRTC 2024-295

Questions for discussion

The Commission is seeking comments from interested persons on the questions below as part of their interventions, which are to be submitted no later than **9 January 2025**.⁷

Interested persons may also address responses from telecommunications service providers (service providers) to the [request for information](#) sent by the Commission on 23 July 2024.

Q1. What features or functions should the Commission mandate as part of any required self-service mechanism, and what information about using them do Canadians need? Explain the specific needs being addressed.

Q2. Should the Commission only require that a minimum baseline of features or functions be offered as part of self-service mechanisms? Why or why not?

Q3. How should Canadians be able to access these self-service mechanisms? Should they be required to be made available on the service provider's website, through apps, over the phone, in stores and at kiosks, or using a different method? Why or why not?

Q4. Should the Commission address concerns related to self-service mechanisms entirely replacing other ways customers can cancel or modify their contracts? Why or why not? Are there specific cases that should be treated differently?

Q5. How should the Commission ensure that self-service mechanisms are accessible to persons with disabilities?

Q6. Should the Commission limit or prohibit potential fees that could be charged for any type of customer service? Why or why not?

Q7. How should the Commission contribute to the protection of customer privacy where machine learning or generative artificial intelligence may be used, consistent with the objectives of the *Telecommunications Act* and existing privacy rules related to confidential customer information?

Q8. Should any specific service providers or classes of service providers be exempt from the requirement to offer self-service mechanisms? Why or why not?

⁷ For the computation of this time period, as indicated in section 12 of the [Canadian Radio-television and Telecommunications Commission Rules of Practice and Procedure](#), the period beginning on 21 December in one year and ending on 7 January in the following year must not be included.