



Broadcasting and Telecom Notice of Consultation CRTC 2025-274

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Gatineau, 17 October 2025

Public record: 1011-NOC2025-0274

Call for comments – Improving customer awareness of the Commission for Complaints for Telecom-television Services Inc.

Deadline for submission of interventions: 17 November 2025

Deadline for submission of replies: 2 December 2025

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

Summary

The Commission is helping to ensure that customers have clear contracts, are not surprised by higher bills, and have the information they need to make the best choices about their Internet, wireless, and television services.

The Commission created the Consumer Protection Codes – namely, the [Internet Code](#), the [Wireless Code](#), and the [Television Service Provider Code](#) – so that customers are informed of their rights and obligations in contracts, empowering them to make decisions with confidence about these important services.

The [Commission for Complaints for Telecom-television Services Inc.](#) (CCTS) enforces the Consumer Protection Codes and assists in resolving customer complaints. While communications service providers have a responsibility to inform customers that the CCTS can [help resolve issues](#), data collected by the Commission suggests that customers may be abandoning complaints before they are informed about the CCTS by their provider. This public consultation aims to explore ways to improve awareness of the CCTS when customers have unresolved complaints and to ensure that they are informed in a timely manner.

The Commission's preliminary view is that communications service providers should be required to inform customers of the CCTS earlier than they currently do, and specifically, right after the service provider offers a solution to the customer. This would be accomplished through amendments to the Consumer Protection Codes.

This public consultation is one of many actions the Commission is taking as part of its [Consumer Protections Action Plan](#) to help protect and empower customers. Following this proceeding, the Commission will impose measures to improve customer awareness and strengthen complaint resolution standards. More broadly, the Commission plans to

combine the Consumer Protection Codes into a single code that is more clear, simple, and consistent across all services.

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 at the end of this notice.

The Commission will accept video comments and replies in American Sign Language (ASL) and Langue des signes québécoise (LSQ) for this proceeding.

A concurring opinion by Commissioner Bram Abramson is attached to this notice.

Introduction

Why we are launching this proceeding

1. The Commission is launching this consultation to gather comments on how to ensure that customers with unresolved complaints are made aware of the Commission for Complaints for Telecom-television Services Inc. (CCTS) more often and in a more timely manner.
2. The Commission's decisions must advance the policy objectives set out in section 7 of the *Telecommunications Act* (the Act). This proceeding addresses three 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));
 - render reliable and affordable telecommunications services of high quality accessible to Canadians in both urban and rural areas in all regions of Canada (paragraph 7(b)); and
 - respond to the economic and social requirements of users of telecommunications services (paragraph 7(h)).
3. In making decisions, the Commission must also implement the 2023 Policy Direction.¹ It states that the Commission must enhance and protect the rights of customers in telecommunications markets by strengthening the ability of the CCTS to better fulfill its mandate.
4. To better understand customer awareness and satisfaction with the CCTS, the Commission commissioned public opinion research. This research report, entitled *Understanding consumer awareness and satisfaction with the Commission*

¹ *Order Issuing a Direction to the CRTC on a Renewed Approach to Telecommunications Policy*, SOR/2023-23, 10 February 2023.

for Complaints for Telecom-television Services (CCTS), has been added to the record of this proceeding.

5. On 5 November 2024, the Commission issued a Secretary General [letter](#) containing requests for information to service providers for information on how they make customers aware of the CCTS. The responses were received by 6 December 2024 and have been added to the record of this proceeding.

Preliminary views

6. Before a customer can take a complaint to the CCTS for resolution, the service provider must continue to have the first opportunity to resolve it. This is the most efficient approach and aligns with the intended role of the CCTS, which is an ombudsman service that can be used when customers cannot resolve their complaints about telecommunications and television services with their service provider.
7. However, in situations where customers are unable to resolve their complaint directly with their service provider, they must be made aware of the CCTS in a timely manner to allow them to benefit from this free service.
8. Therefore, the Commission sets out the following preliminary views:
 - Informing customers about the CCTS: The current requirement that service providers inform customers about the CCTS at the second level of escalation is not serving customers as intended.² The Commission is of the preliminary view that it should be replaced with a requirement that service providers inform customers with a complaint about both service providers' internal complaint resolution processes and their right as customers to have recourse to the CCTS when an "offered solution" is presented.³
 - Definition of an offered solution: An offered solution should be defined as a proposal made by the service provider that aims to conclude the complaint, regardless of whether the resolution is favourable to the customer.
 - It must be provided in an accessible written format (e.g., email, text, or other written medium).
 - If the resolution is made during a phone call or online chat, it must be followed up with a written confirmation in an accessible format.

² Based on the [Internet Code compliance reports](#), which are filed annually with the Commission by 31 August, and the [Wireless Code compliance reports](#), filed by 31 March, it appears that the second level of escalation is not defined consistently within the industry, which may contribute to problems with informing customers of the CCTS.

³ This requirement was set out in paragraph 426 of the [Review of the Wireless Code](#) and in paragraph 468 of the [Internet Code](#). There is no such requirement in the [Television Service Provider Code](#). It is consistent with the obligation in the CCTS Participation Agreement.

- The service provider must also track whether the customer accepts the offered solution, ensuring that the proposal and the customer response are clearly documented and the records are kept. If no compensation, financial or otherwise, is offered, the service provider must clearly explain, in writing, the rationale for this decision as part of the offered solution.
- Finally, the definition of an offered solution would not include the implementation of the offered solution.
- Escalation: If a customer with a complaint expresses dissatisfaction with the complaint resolution process (including delays) or explicitly requests to escalate the complaint, the service provider must inform customers about the CCTS at that time.
- Timeliness of resolving complaints: The Commission expects that service providers make the best efforts to resolve complaints at first contact and to minimize delays in resolution.
- Implementation: The requirements should be imposed by modifying the Internet Code, Wireless Code, and Television Service Provider Code (together, the Consumer Protection Codes).

Call for comments

9. The Commission is seeking comments from communications service providers, industry stakeholders, customers, and other interested parties on (i) the proposed changes to the Consumer Protection Codes, in light of the Commission's preliminary views, and (ii) the questions detailed in the appendix to this notice.
10. In addition, the Commission is seeking comments from the CCTS about the impact of the proposed changes on its operations, including its Participation Agreement, and how long it will take the CCTS to operationalize the changes.

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 the present proceeding. 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 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.

Submitting an intervention

12. The Commission invites comments that address the issues set out above. The Commission will accept comments that it receives on or before **17 November 2025**.
13. The Commission invites individuals who are Deaf or hard of hearing and their representatives to present their comments on the issues under consideration in American Sign Language (ASL) and Langue des signes québécoise (LSQ) in video format if they so choose. Parties filing video comments must provide a working link to their video in the Intervention form. As these videos will inform the Commission's decision-making, they must be publicly accessible. For instance, a link that requires another party to request access to the video would not meet this standard.
14. The Commission will transcribe the ASL and LSQ interventions filed for this proceeding and the transcripts will be posted on the Commission's website to facilitate the reply comments process for all interveners.
15. Any interested persons and parties can request accommodations to participate in this Commission proceeding. This could be related to disability, or to other reasons, like religious observance, or to a combination of reasons. If you wish to request accommodations in filing your comments, you are encouraged to make your request **within the first 15 days** after this notice of consultation is posted on the Commission's website.
16. Interested persons who require assistance submitting comments can contact the Commission's Hearings & Public Proceedings group at hearing@crtc.gc.ca.
17. For more information on accessibility and accommodations in Commission proceedings, see Broadcasting and Telecom Information Bulletin 2025-95.
18. Pursuant to Broadcasting and Telecom Information Bulletin 2015-242, the Commission expects incorporated entities and associations, and encourages all interested persons and parties, to file submissions for Commission proceedings in accessible formats (for example, text-based file formats that allow 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.
19. Interested persons and parties are permitted to coordinate, organize, and file, in a single submission, interventions by other interested persons or parties 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 covering letter to be filed by the parties, can be found in Telecom Information Bulletin 2011-693.
20. 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.

21. All documents required to be served on parties to the proceeding must be served using the contact information contained in the interventions. An intervention or answer from a respondent must be filed with the Commission and served on the applicant on or before the above-mentioned date. An answer from a respondent must also be served on any other respondent.
22. The Commission encourages interested persons and parties to monitor the record of the proceeding, available on the Commission's website, for additional information that they may find useful when preparing their submissions.
23. 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.
24. Submissions must be filed by sending them to the Secretary General of the Commission using **only one** of the following means:
 - completing the [intervention form](#);
 - sending a fax to 819-994-0218;
 - writing by mail to CRTC, Gatineau, Quebec K1A 0N2; or
 - submitting an ASL or LSQ video using the intervention form.
25. Submissions longer than five pages should include a summary. Submissions will be posted in the official language and format in which they are received.
26. 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. Gatineau 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.
27. 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.
28. 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.

Submitting a reply

29. Parties can file replies with the Commission by **2 December 2025**. Their replies can address any matters on the record of the proceeding.

Privacy notice

30. 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. Links to ASL or LSQ video submissions and the transcripts of these videos will also be put on the Commission's website.
- 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 web page 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. That said, because individuals who submit an ASL or LSQ video comment or reply must submit a working link to a publicly viewable version of their video to the Commission, depending on where the video was uploaded, any intervention or reply submitted via ASL or LSQ video may be searchable by a third-party search engine.
- 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

31. 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.
32. 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.

33. 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

34. The Commission requires regulated entities and encourages all parties to file submissions in accessible formats (e.g., 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 [guidelines](#) on its website for preparing documents in accessible formats.
35. 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.
36. The Commission is accepting submissions in ASL or LSQ in video format. The Commission will publish the link(s) to the parties' video(s) on its website. The permissions on the video(s) must be set to public. The Commission will not accept links that require anyone to request access to the video(s). The links on the Commission's website will redirect users to parties' videos as they are uploaded, and users will have access to any of the parties' personal information displayed on the video-hosting platform. The videos will be fully translated into text, and transcripts will be available in English and French for ASL and LSQ videos.

Accessing documents

37. 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.
38. 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.
39. 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

Applications for costs

40. Since this proceeding is a joint telecommunications and broadcasting proceeding with an emphasis on telecommunications, any broadcasting-related costs incurred by interveners to participate are inextricable from telecommunications-related costs. As such, all costs applications in this proceeding will use the telecommunications costs process and be reviewed and assessed under the regime set out in the Act.
41. The Commission considers that active participation of individuals and groups that represent the public interest provides a valuable contribution to its decisions. These individuals and groups may require financial assistance to effectively participate in Commission proceedings. To understand how to apply for costs after the proceeding, please visit the Commission's "[How to claim telecommunications proceeding expenses](#)" page.

Secretary General

Related documents

- *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 Television Service Provider Code*, Broadcasting Regulatory Policy CRTC 2016-1, 7 January 2016
- *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
- *Guidelines on the CRTC Rules of Practice and Procedure*, Broadcasting and Telecom Information Bulletin CRTC 2010-959, 23 December 2010

Appendix to Broadcasting and Telecom Notice of Consultation CRTC 2025-274

Proposed changes to the Consumer Protection Codes

1. The Commission is seeking comments on the proposed changes to the Internet Code, Wireless Code, and Television Service Provider Code (together, the Consumer Protection Codes):
 - Replace the current second level of escalation requirement in the Wireless Code⁴ and the Internet Code⁵ and their respective policies with: when a service provider provides an offered solution to a customer, the service provider must (i) inform the customer about its additional internal complaint resolution process, and (ii) inform the customer about their right of recourse to the [Commission for Complaints for Telecom-television Services](#) (CCTS). If a customer expresses dissatisfaction with the complaint resolution process (including the amount of time it is taking) or if the customer asks to escalate the complaint, the service provider is required to inform the customer about their right of recourse to the CCTS. Service providers are expected to use their best efforts to resolve a complaint on first contact and minimize delays in resolving the complaint.
 - Add the following requirement to the Television Service Provider Code and its respective policy: when a service provider provides an offered solution to a customer, the service provider must (i) inform the customer about its additional internal complaint resolution process; and (ii) inform the customer about their right of recourse to the CCTS. If a customer expresses dissatisfaction with the complaint resolution process (including the amount of time it is taking) or if the customer asks to escalate the complaint, the service provider is required to inform the customer about their right of recourse to the CCTS.

⁴ See paragraph 426, bullets e. and f. of Telecom Regulatory Policy 2017-200 the Wireless Code, which directs wireless service providers (WSPs) to “e. inform customers of their right of recourse to the CCTS immediately upon a failure to resolve a complaint at the second level of escalation, and again at subsequent levels of escalation within the WSP’s internal process; and f. retain statistics on an ongoing basis on how many customers, out of the total number of customers who make a formal complaint, they informed about the CCTS, and provide these statistics to the Commission as part of the compliance reporting process on an annual basis.”

⁵ See paragraphs 468 and 480 of Telecom Regulatory Policy 2019-269, the Internet Code, which directs Internet service providers subject to the Internet Code to inform customers of their right of recourse to the CCTS immediately upon a failure to resolve a complaint at the second level of escalation, and again at subsequent levels of escalation within the WSP’s internal process; and retain statistics on an ongoing basis on how many customers, out of the total number of customers who make a formal complaint, they informed about the CCTS, and provide these statistics to the Commission as part of the compliance reporting process on an annual basis.

- For the purposes of all three Consumer Protection Codes:
 - An offered solution is defined as a service provider’s written proposal intended to close the complaint, regardless of whether the outcome is in the customer’s favour.
 - The written proposal (e.g., email, text, or other written medium) must be in a permanent and accessible format.
 - If an offered solution is made over an online chat or phone call, the service provider is required to follow up and confirm the solution in a permanent and accessible written format that the customer can retain for their records.
 - The service provider must keep a record of whether a customer has accepted the offered solution.
 - If the service provider does not consider that the customer is entitled to any compensation, this must be clearly explained, with rationale, in writing, as part of the offered solution.
- Service providers are expected to use their best efforts to resolve a complaint on first contact and minimize delays in resolving the complaint.
- The requirement that a service provider include information about the CCTS in the Critical Information Summary provided to a customer when a contract is entered into is to be maintained.

Questions for discussion

2. 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 **17 November 2025**.
3. Interested persons may also address responses from service providers to the request for information included in the Secretary General letter sent by the Commission on 5 November 2024.

Q1. Provide comments on the Commission’s preliminary views set out in paragraph 8 of this notice of consultation, with consideration of the following:

- customers’ awareness of the CCTS when those customers have complaints;
- the proposed definition of an offered solution as set out in paragraph 8 of this notice of consultation;

- the format in which an offered solution is to be provided, namely an accessible, written form (e.g., email, text, or other written medium);
- the offer of a clear explanation to a customer in writing where the service provider does not consider that the customer is entitled to any compensation;
- the tracking by a service provider to determine whether a customer has accepted the offered solution; and
- service providers informing customers about the CCTS where the customer expresses dissatisfaction with the complaint process, notes delay in the complaint process, or requests an escalation.

Q2. In order to ensure the timeliness of resolving complaints, should there be a deadline by which time the service providers must inform a customer with a complaint about the CCTS if they have not provided an offered solution?

Implementation

Q3. What changes must service providers make to their respective complaint resolution processes to implement the proposed changes set out in paragraph 1 of this appendix? How long would these changes take to implement?

Q4. Are there specific considerations that the Commission needs to keep in mind with respect to smaller service providers or resellers?⁶

⁶ While the Commission is seeking views on potential impacts on smaller telecommunications service providers (TSPs) or resellers, it should be noted that because the proposed changes would be implemented through the Consumer Protection Codes, they would not apply to resellers – except for wireless resellers. Moreover, most very small TSPs would not be subject to these requirements.

Concurring opinion of Commissioner Bram Abramson

1. Consumer and small business users of Canadian telecommunications and television services ought to be aware of the Commission for Complaints for Telecom-television Services (CCTS) and its role. The mechanism set out in three of the four current Consumer Codes,¹ which triggers a key notification based on a notional “second level of escalation,”² has not worked. This Broadcasting and Telecom Notice of Consultation (Notice) launches a proceeding to identify a better approach.
2. I concur in its launch. A better approach is needed. However, I do not concur in two of the preliminary views it adopts, and toward which it steers interveners preparing their evidence.
3. First, the Notice’s preferred approach relies on service providers to interpret when the complaint journey has reached a particular stage. So does the current approach. But other industry dispute resolvers work differently. For instance, a fixed time period begins when a complaint is first made, after which the customer may turn to the dispute resolution body – something the provider must explain from the start.
4. I am concerned that in steering interveners towards one approach that shares some of the same dependencies as the current process, we risk repeating past mistakes. A fuller record that examines alternative approaches carefully is to be preferred.
5. Second, the Notice canvasses “specific considerations... with respect to smaller service providers or resellers,” but cautions that the proposed changes “would not apply to resellers – except for wireless resellers. Moreover, most very small TSPs [telecommunications service providers] would not be subject to these requirements.”³
6. But not only does the [Mobile] Wireless Code apply directly to all TSPs that clear the low bar of acting as a Canadian carrier,⁴ and indirectly to resellers who do not.⁵ The Internet [Access] Code’s non-application to Internet access providers that are not “large facilities-based ISPs [Internet service providers]” is tempered by the

¹ The Deposit and Disconnection Code, which relates to home telephone services and, uniquely among the four, does not trigger a consumer CCTS notification, as well as the: Internet [Access] Code, which relates to wireline and fixed wireless services; Wireless Code, a code for mobile services; and Television Service Provider Code, which ought perhaps now also cover streaming services that exceed a size threshold in Canada.

² Of course, service providers are also required to inform customers about the CCTS via quarterly bill messages, a dedicated web page no more than two clicks deep, and site-specific search engine optimization.

³ See Appendix, Q4 and accompanying footnote, above.

⁴ A Canadian carrier is a telecommunications service provider, whether owned or controlled by Canadians or by non-Canadians, that owns or operates in Canada at least a single network segment, connecting two distinct locations, that anyone uses to provide telecommunications services to the public for compensation. That segment may be fibre or copper, for instance – but may also simply be spectrum with radios at either end. *Telecommunications Act*, subsection 2(1).

⁵ Telecom Regulatory Policy 2017-200, paragraphs 451 (Canadian carriers) and 452 (resellers).

Commission's explicit "expectation that all ISPs behave in a manner consistent with all the principles set out in the Internet [Access] Code."⁶

7. Smaller TSPs play a distinct role in offering consumer choice and exerting price and service pressure in the market, often the by-product of proximity to customers. Indeed, the Commission has a responsibility to reduce barriers to competition for regional and smaller TSPs.⁷ Whether the requirements on this proceeding ought, therefore, be crafted in a way to be clear whether smaller TSPs ought to be subject to them is, in my view, a live issue.
8. Notices of Consultation direct the public in developing the evidence that will frame our rulemaking. The resulting record both defines and limits the choices before the Commission. That is why, while I concur in the launch of this proceeding, I have made public the areas I believe warrant closer examination.

⁶ Telecom Decision 2021-125, paragraphs 5, 51, and 58.

⁷ *Order Issuing a Direction to the CRTC on a Renewed Approach to Telecommunications Policy*, SOR/2023-23, 10 February 2023, paragraph 2(e).