



Telecom Notice of Consultation CRTC 2026-31

PDF version

Gatineau, 13 February 2026

Public record: 1011-NOC2026-0031

Call for comments – The fee structure and fee dispute mechanism at the Commission for Complaints for Telecom-television Services Inc.

**Deadline for submission of responses to request for information (see Appendix 2):
16 March 2026**

Deadline for submission of interventions: 31 March 2026

Deadline for submission of replies: 15 April 2026

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

Summary

Canadians need competitive choices, clear contracts, predictable billing, and adequate information to make informed choices about their Internet, wireless, and television services.

When Canadians are unable to resolve an issue related to one of those services directly with their service provider, they can contact the Commission for Complaints for Telecom-television Services Inc. (CCTS). The CCTS is an independent organization that helps Canadians resolve issues with their telecommunications and television service providers.

The CCTS also plays an important role in enforcing the Consumer Protection Codes, including 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 services. Telecommunications service providers (TSPs) are required to participate in the CCTS and to fund it through an annual fee and a fee for each customer complaint accepted by the CCTS. Meanwhile, the CCTS's complaint-resolution services are free for TSPs' customers.

As part of its [Consumer Protections Action Plan](#) to help protect and empower customers, the Commission is launching this notice of consultation to seek feedback on the CCTS's complaint-based fee structure and the mechanisms through which such fees can be disputed.

Regarding these issues, the Commission has two preliminary views: the CCTS's funding scheme may disproportionately burden small TSPs, new market entrants, and regional players compared to large TSPs; and there may not be an effective mechanism for TSPs to have the fees related to

complaints reviewed. The Commission considers that, if these two views are accurate, they limit the efficient resolution of some customer complaints and lead to an increased number of small TSPs having their participation in the CCTS terminated, which affects TSP customer protection and reduces competition in the telecommunications market.

Accordingly, interested persons are invited to comment on the existing fee structure and provide suggestions on how it can be improved. With this feedback, the Commission will be able to determine whether there are inequities built into the CCTS's fee structure and if so, how such inequities could be mitigated. Any mitigation measures subsequently undertaken by the Commission will reduce administrative burden, which will help foster fairer and more equitable competition among TSPs and ensure efficient and effective complaint-resolution services by the CCTS for all TSP customers.

A complete list of questions can be found in Appendix 1 to this notice. Additionally, important information on how interested persons can participate in this proceeding can be found at the end of this notice.

Background

Why we are launching this proceeding

1. The Commission for Complaints for Telecom-television Services Inc. (CCTS) is an independent, not-for-profit organization that assists in resolving issues between telecommunications and television service providers and their customers. It works to provide fair, impartial, and effective complaint-resolution services, data, and insights.
2. The CCTS was established by several telecommunications service providers (TSPs) in response to an Order in Council issued by the Government of Canada in 2007,¹ which indicates that all TSPs should participate in the CCTS and contribute to its funding. The 2007 Order in Council also states that the CCTS should serve individual and small-business retail customers.
3. In Telecom Decision 2026-30, the Commission considered an application from InnSys Inc. (InnSys), an Internet service provider, alleging that the CCTS's fee structure and participation fees, which consist of a fee for each customer complaint accepted by the CCTS (complaint-based fee) and an annual fee, place an unfair burden on small TSPs. InnSys also claimed that the CCTS does not have a clear and transparent system that allows TSPs to dispute fees charged (fee dispute mechanism).
4. The Commission received submissions from industry associations and an individual expressing various opinions on InnSys's application and found that InnSys had raised important issues.

¹ [Order requiring the CRTC to report to the Governor in Council on consumer complaints, Order in Council P.C. 2007-533, 4 April 2007.](#)

However, since a decision on these issues could have a significant impact on all TSPs as well as the CCTS, the Commission chose to launch this proceeding to examine the issues more effectively.

5. The Commission is therefore launching this proceeding to (i) determine whether the complaint-based fee structure of the CCTS disproportionately burdens small independent TSPs in a way that could affect their ability to provide competitive services, and whether a more equitable complaint-based fee pricing structure is needed, and (ii) determine whether a dispute mechanism for fees should be introduced at the CCTS.

Legal framework

6. The Commission's decisions must advance the policy objectives set out in section 7 of the *Telecommunications 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)).
7. The 2023 Policy Direction² also states that the Commission must enhance and protect the rights of TSP customers in telecommunications markets by strengthening the ability of the CCTS to better fulfill its mandate. At the same time, it directs the Commission to consider how its decisions would promote competition with particular focus on reducing barriers to entry into the market for competition.
8. Since this proceeding is based on the application from InnSys, that application's public record will be added to the public record of this proceeding.

Preliminary views

9. The Commission sets out the following preliminary views:

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

- The impact of the fees may disproportionately burden small TSPs, new market entrants, and regional players compared to large TSPs.
- There may not be an effective dispute mechanism for TSPs to have the fees related to complaints reviewed. The Commission considers that such a mechanism may be necessary.

Call for comments

10. The Commission calls for comments on the issues set out below and the questions set out in Appendix 1 to this notice. The Commission will accept interventions that it receives on or before **31 March 2026**. Only parties to the proceeding can participate in later stages of the proceeding. The deadline for parties to file replies to matters raised during the intervention phase is **15 April 2026**.

What we are examining in this proceeding

11. In this proceeding, the Commission will examine the impact of the current fee structure and the lack of a fee dispute mechanism on TSP customers and on competition.
12. The CCTS administers the Television Service Provider (TVSP) Code, so television service providers also participate in the CCTS. However, the TVSP Code only applies to licensed broadcasting distribution undertakings and the issues being examined in this proceeding are specific to small independent TSPs, so this consultation will focus on the experience of small providers that provide telecommunications services.

The impact on TSP customers

13. When TSPs do not participate in the CCTS, their customers do not have access to the CCTS's dispute-resolution process, which provides recourse for resolving disputes with their TSPs.
14. The Commission considers that complaint-based fees and the lack of an adequate fee dispute mechanism have contributed to small TSPs not participating in the CCTS and their subsequent referral to the Commission for non-compliance with the requirement to participate in the CCTS. A list of such referrals can be found on the [CCTS website](#).
15. The Commission is seeking comments on how the current fee structure may impact TSP customers. Questions relating to the current system's impact on TSP customers can be found in the "Telecommunications service providers customer" section of Appendix 1 to this notice.

The impact on competition

16. In its application that led to Telecom Decision 2026-30, InnSys raised the concern that the high cost of complaint-based fees impacts its ability to compete and offer its services to customers.

InnSys claimed that the complaint-based fees charged by the CCTS and the lack of an adequate fee dispute mechanism disproportionately affect small TSPs.

17. The CCTS's response to InnSys's application set out in Telecom Decision 2026-30 indicates that TSPs with revenues under \$10 million (small TSPs) more frequently incur higher complaint-based fees than TSPs with revenues above \$10 million (large TSPs). This highlights that each individual complaint tends to incur a higher fee for small TSPs. This may be due to the limited capacity of small TSPs to resolve complaints at earlier, less expensive steps in the fee process.³
18. In line with the 2023 Policy Direction, the Commission is considering the impact of complaint-based fees on small TSPs, new market entrants, and regional players, and how it compares to the impact on large TSPs, which have greater economies of scale. Questions relating to the current system's impact on competition can be found in the "competition" section of Appendix 1 to this notice.

Addressing the dispute mechanism

19. InnSys submitted that it was unfair for small TSPs to be unable to dispute fees charged to them. The CCTS currently has a narrow dispute mechanism in place that addresses the following scenarios:
 - if an amount is charged or invoiced incorrectly, such as when a TSP is charged fees for an escalation step that is higher than the step reached by a complaint; and
 - if a complaint was accepted and later determined to be out of scope of the CCTS's mandate.
20. The CCTS currently directs TSPs wishing to dispute the complaint-based fee amounts applied at each level of escalation to their respective representative on the CCTS Board of Directors. The amounts can only be changed by a majority vote of six of seven members of the Board.
21. The Commission recognizes that small TSPs may be frustrated with the CCTS's dispute mechanism, which does not have sufficient recourse for TSPs to dispute complaint-based fees. Given the historical record of TSP referrals for non-compliance to the Commission by the CCTS, the Commission's view is that participation from some TSPs would likely not have to be

³ The CCTS uses a multi-step process to resolve complaints. The first step is assessment of the complaint to determine whether it falls within the CCTS's mandate. The second step is the complaint's initial referral to the TSP, which has 20 days to respond to the complaint. If the complaint is not resolved at this step, it is escalated to step 3: conciliation and investigation. The final step is the outcome, where the TSP must implement any agreed-upon resolution. More information on this process can be found on the CCTS's website.

terminated from the CCTS and subsequently referred to the Commission if the CCTS had an adequate dispute mechanism.⁴

What you need to know to participate in this proceeding

Procedure

22. The *Canadian Radio-television and Telecommunications Commission 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 comments

23. The Commission invites comments that address the questions set out in Appendix 1 to this notice. The Commission will accept interventions that it receives on or before **31 March 2026**. Only parties to the proceeding can participate in later stages of the proceeding. The deadline for parties to file replies to matters raised during the intervention phase is **15 April 2026**.
24. The CCTS is made party to this proceeding. Interested persons who wish to become parties to this proceeding must submit an intervention.
25. 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.
26. Interested persons and parties who require assistance submitting comments can contact the Commission's Hearings & Public Proceedings group at hearing@crtc.gc.ca.
27. For more information on accessibility and accommodations in Commission proceedings, see Broadcasting and Telecom Information Bulletin 2025-95.

⁴ The Commission reminds interested persons that they can use the Part 1 application process to seek clarification of a Code or if they disagree with the CCTS's interpretation of a Code. Nevertheless, Commission decisions on such applications will not impact any disputes that were previously resolved by the CCTS; rather, they will guide the CCTS in any relevant future disputes. Any ambiguity in the Wireless Code, the Internet Code, a TSP customer's contract, or the manner in which any of these are applied must be clarified using an interpretation that is favourable to the customer.

28. 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.
29. 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.
30. 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.
31. 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.
32. 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.
33. Submissions must be filed by sending them to the Secretary General of the Commission using **only one** of the following means:

by completing the
[\[Intervention/comment/answer form\]](#)

or

by mail to
CRTC, Gatineau, Quebec K1A 0N2

or

by fax at
819-994-0218

34. 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.
35. 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.
36. 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.

Request for information

37. The CCTS is to respond to the request for information set out in Appendix 2 to this notice by **16 March 2026**. Its response will be added to the public record of this proceeding.

Confidentiality notice

38. 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.
39. 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.
40. Parties can designate information as confidential under subsection 39(1) of the *Telecommunications Act* and provide a detailed rationale as to why that information should be considered confidential. The Commission reminds parties 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.

Privacy notice

41. Please note the following:

- Documents will be posted on the Commission's website exactly as received, in the official language and format in which they are 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 web page of this particular 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.

Availability of documents

42. 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.

43. 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.

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

Documentation Centre
examinationroom@crtc.gc.ca

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

Secretary General

Related documents

- *InnSys Inc. – Application regarding the participation of small telecommunications service providers in the Commission for Complaints for Telecom-television Services Inc.*, Telecom Decision CRTC 2026-30, 13 February 2026
- *Accessibility and accommodations guidelines*, Broadcasting and Telecom Information Bulletin CRTC 2025-95, 14 May 2025
- *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

Appendix 1 to Telecom Notice of Consultation CRTC 2026-31

Questions for all parties

Telecommunications service providers customer

Q1. How does the current complaint-based fee structure at the Commission for Complaints for Telecom-television Services Inc. (CCTS) impact small telecommunications service providers (TSPs), TSP customers, TSP customer choice, or affordability?

Q2. How does the CCTS's complaint-based fee structure affect the financial viability of TSPs?

- (a) How does the complaint-based fee structure's impact differ by TSP based on the TSP's financial capacity and cost burdens?
- (b) What is the complaint-based fee structure's impact on small TSPs? Provide evidence to support your answer.

Competition

Q3. Should the fee structure for small TSPs be modified considering the different cost burdens experienced by TSPs with under \$10 million in revenue (small TSPs) compared to TSPs with over \$10 million in revenue (large TSPs)? Please explain.

Q4. If the fee structure should be changed, what would be an appropriate complaint-based fee structure for small TSPs?

- (a) Would this structure continue to incentivize early complaint resolution?
- (b) Would a maximum fee cap, a flat fee, an annual fee only, or a fee threshold be appropriate?

Q5. Is the process of setting the fees and budget at the CCTS transparent, accessible, and fair? Please provide details and describe any changes that could make the process more transparent, accessible, and fair.

Q6. Does the CCTS's current complaints process, as set out in the [CCTS Procedural Code](#), ensure that customer complaints are resolved efficiently while also accounting for small TSPs' limited capacity to respond to existing timeframes?

- (a) If not, what measures could be introduced to ensure a fair and efficient complaint resolution process that accounts for the different capacities of small TSPs?

Q7. Does the current dispute mechanism in place at the CCTS effectively address disputes related to fees? Please provide details on how, and if not, suggestions for how to improve.

Appendix 2 to Telecom Notice of Consultation CRTC 2026-31

Request for information from the Commission for Complaints for Telecom-television Services Inc.

Q1. What resources or supports does the Commission for Complaints for Telecom-television Services Inc. (CCTS) offer small telecommunications service providers (TSPs) to overcome financial or operational constraints in resolving complaints efficiently? Are current resources and support being utilized by small TSPs?

Q2. The CCTS updated its complaints process in 2023. What has the impact of these changes been on TSPs so far? Is there data indicating any change?

Q3. Why is the complaints mechanism unable to differentiate between complaints about issues that impact multiple customers (such as complaints resulting from an outage) and complaints about issues that affect a single customer?

Q4. How long would it take for the CCTS to implement a new fee system for complaints and new reporting and transparency requirements for the CCTS?