

## Developing Public Awareness of CCTS

The CCTS Board of Directors has reviewed the Public Awareness Plan (the “Plan”) and has approved a number of amendments. The revised Plan is as set out below. The revised Plan must be fully implemented by Participating Service Providers (“PSPs”) effective February 1, 2018.

### 1. CCTS Notice and Web Site Link on Participating Service Provider Web Sites

**OBJECTIVES:** To ensure that customers with questions or problems related to their service(s) and who seek information online will be able to inform themselves easily on the methods available to them to communicate with their provider, and, in the event of unresolved concerns, with CCTS.

**REQUIREMENTS:** The PSPs will provide information to their customers about their own complaint-handling processes, and about CCTS, on their web sites, in the manner described below.

- a. PSPs will create a dedicated public-facing web page on their web sites, which will act as a home for all required information about their internal complaint-handling processes, and for information regarding CCTS (“the complaints page”). This page will contain a link from the PSP’s site to the CCTS web site home page.
- b. PSPs will also provide a **clearly-labeled and easy-to-find** path, consisting of no more than two web links, from their web site home page to the complaints page. In other words, a site visitor will be able to get from the home page to the complaints page in no more than two clicks. The web links that make up this path will be of reasonable size, and readily accessible to any site visitor, including those with accessibility needs.
- c. Those PSPs whose sites have a “Search” function will ensure that a search that includes any of the following key words will return a link to the complaints page: “complaint”, “dispute”, “CRTC”, “CCTS”, “commission”, “ombudsman”.
- d. The information to be provided about CCTS on the complaints page will include, at a minimum, the same text as the white pages directory notice:

**Commission for Complaints for Telecom-television Services (CCTS)** CCTS is an independent agency whose mandate is to resolve complaints of consumers about their telecom and TV services, and complaints of small business customers about their telecom services, free of charge. If you have a complaint about your telephone, wireless, internet or TV service, you must first try to resolve it directly with your service provider. If you have done so and have been unable to reach a satisfactory resolution, CCTS may be able to help you.

To learn more about CCTS, you may visit its website at [www.ccts-cprst.ca](http://www.ccts-cprst.ca) or call toll-free at 1-888-221-1687.

- e. The complaints page will also display the CCTS logo.

The CCTS information may be integrated into the discussion of the service provider's internal complaint-handling process, but in any event will be placed in such a manner that it is clear to customers that CCTS is independent of the industry and is not part of the service provider's internal complaint-handling process.

## 2. Customer Bill Messages

**OBJECTIVE:** In Telecom Regulatory Policy CRTC 2011-46, the CRTC ruled: *"The Commission considers that the appearance of a standard notation on billing statements should increase from two to four times annually. Also, over time, as TSPs modify their billing systems, they should include a permanent and prominent location for a standard notification about the CCTS such as on the last page of their monthly billing statements."* CCTS has incorporated this regulatory requirement into its Public Awareness Plan.

**REQUIREMENTS:** The PSPs will provide a message referencing CCTS on customer bills (whether paper or electronic), or optionally by way of a bill insert:

- a. The message will appear at least four times per year, and is intended to be delivered on a quarterly basis. Those PSPs which report to CCTS revenues exceeding \$10 million will annually provide to CCTS their bill message or notice schedule, and will make best efforts to inform CCTS of any subsequent changes to that schedule, in order to permit CCTS to appropriately allocate its Contact Centre resources for periods of anticipated high call volumes.
- b. In order to comply with the requirements of TRP 2011-46, PSPs that have *"modified their billing systems"* since January 2011 are expected to include a *"permanent and prominent location for a standard notification about CCTS"* on their bills.
- c. The location of the CCTS notice on customer bills will be left to the discretion of the PSP, as long as the notice is reasonably prominent relative to other notices of a similar nature.
- d. The billing notice will read as follows: *Do you have a complaint regarding a telecom or residential TV service that we haven't been able to resolve? The independent Commission for Complaints for Telecom-television Services (CCTS) may be able to assist you free of charge: [www.ccts-cprst.ca](http://www.ccts-cprst.ca) or 1-888-221-1687.*
- e. The following optional third sentence for the notice, indicating that CCTS does not address complaints relating to regulated telecommunications services, will be available for the use of PSPs that continue to provide regulated telecommunications services: *CCTS cannot accept complaints about services delivered to customers in regulated exchanges.*
- f. PSPs will deliver a similar message to their customers that do not receive bills, such as pre-paid wireless customers. In the case of pre-paid wireless customers, the service provider will also deliver a message to active customers at least four times per year, to inform those customers about CCTS. The message may take

the form of a text message to the customer; it may be provided by way of the portal used by customers to purchase pre-paid time; or it may be provided in such other manner as will come to the attention of these customers. In the event that a service provider chooses to use the text message option, any such SMS message sent to customers will clearly indicate that it is a text message from the provider, and that it is free of charge to the customer.

The suggested wording of this message is:

“Free message from [name of provider]. Unresolved complaint about telecom or residential TV service? CCTS may be able to help. 1-888-221-1687 or [www.ccts-cprst.ca](http://www.ccts-cprst.ca).”

- g. PSPs are encouraged to include the billing notice on any “summary bills” or electronic bill summaries or notices that they provide to their customers.

### 3. Customer Notification by Service Providers

**OBJECTIVES:** In order to ensure that customers who have unresolved concerns or complaints are made aware of their right of recourse to CCTS, PSPs are required to notify customers of the availability of this recourse. The PSPs have different internal complaint-handling processes. Some of these processes have multiple stages and are resourced with increasingly senior and experienced staff. The objective is for PSPs to notify customers who have unresolved complaints of their right of recourse to CCTS at a stage that is not too early in the internal process (thus preventing premature escalations to CCTS) but not so late in the internal process that customers abandon their complaints prior to receiving notice of their recourse to CCTS.

**REQUIREMENTS:** In dealing with customers who have contacted the PSP with a concern or complaint about an issue that falls within CCTS’ mandate, the PSPs will ensure that their staffs inform the customer of the recourse offered by CCTS in the event the concern or complaint cannot be resolved to the satisfaction of the customer.

No matter how any individual PSP designs and resources its internal process, the PSPs will inform customers of their right of recourse to CCTS immediately upon a failure to resolve a complaint following the second escalation, and again at subsequent levels of escalation within the PSP’s internal process, should the customer pursue further internal escalations.

What does “second escalation” mean? When a customer contacts a PSP’s front-line customer service representatives with a complaint or concern, this is the “first contact”. If the issue remains unresolved and the customer is directed to another PSP employee for resolution of the issue (whether to a senior agent, supervisor, manager, etc.), this would be considered to be the “first escalation”. If the issue still remains unresolved and the customer is directed to another PSP employee for resolution of the issue (whether to a senior agent, supervisor, manager, etc.), this would be considered to be the “second escalation”. If this latter PSP employee is unable to resolve the complaint, he/she would be required to notify the customer about the option of

recourse to CCTS. Two or more contacts by the customer to different front-line representatives would not be considered an “escalation” for the purposes of this requirement.

Front-line representatives will be required to notify customers of their right of recourse to CCTS at the “first contact” if the PSP does not have an internal escalation process.

For the purposes of this provision, “contact” means phone calls, emails, online chat, and other methods by which customers contact their service providers to convey complaints and which are ordinarily tracked by the service provider. As communications channels offered by PSPs to customers for discussing complaints evolve, PSPs are encouraged to integrate notification of CCTS into those channels.

PSPs are encouraged to retain evidence that this notification has been made in appropriate cases. In investigating such cases, CCTS will examine all available evidence, which may include call recordings, customer notes, staff training documents and other evidence of business practices that demonstrate diligence in the provision of the required notification. The CCTS Procedural Code has been modified to permit customers to complain to CCTS, in the context of a substantive complaint, about a failure by the PSP to make this notification. Compliance with this requirement will also be monitored by CCTS as part of its regular compliance monitoring program.

#### **4. Amending the Terms of Service**

The respective rights and responsibilities of customers and their service providers are generally set out in the PSP’s Terms of Service/Terms of Use/Terms and Conditions (“the Terms”). Many of these documents discuss dispute resolution but do not reference CCTS. CCTS therefore encourages the PSPs to insert a reference in their Terms regarding the availability of CCTS for the resolution of disputes between themselves and their customers.

#### **5. White Pages Message and Text**

**OBJECTIVE:** To ensure that customers who rely on the “white pages” directory for information about their service or their provider, are informed about CCTS.

**REQUIREMENT:** Those Participating Service Providers (hereinafter “PSPs”) that publish “white pages” directories will insert a reference to CCTS.

- a. The size and specific placement of this reference will be left to the discretion of the PSP, but the PSPs agree that the notice will be **reasonably prominent** relative to other notices of a similar nature and **placed in a logical manner in a location where a customer with a potential complaint is likely to find it.**

Generally, the logical placement would be in the section of the introductory pages of the white pages addressing comments, concerns and complaints

- b. The text of the notice will be as follows:

**Commission for Complaints for Telecom-television Services (CCTS)**

*CCTS is an independent agency whose mandate is to resolve complaints of consumers about their telecom and TV services, and complaints of small business customers about their telecom services, free of charge. If you have a complaint about your telephone, wireless, internet or TV service, you must first try to resolve it directly with your service provider. If you have done so and have been unable to reach a satisfactory resolution, CCTS may be able to help you.*

*To learn more about CCTS, you may visit its website at [www.ccts-cprst.ca](http://www.ccts-cprst.ca) or call toll-free at 1-888-221-1687.*

## **6. Future Review**

The Board of Directors will review this plan no later than August 2020, and may do so sooner should circumstances warrant.