



20 January 2021

Claude Doucet
Secretary General
CRTC
Ottawa, ON K1A 0N2

Filed online

Dear Secretary General,

Re: *Call for comments – Provision of paper bills by communications service providers, Broadcasting and Telecom Notice of Consultation CRTC 2020-81 (14 April 2020), https://crtc.gc.ca/eng/archive/2020/2020-81.htm?_ga=2.37842019.1309790556.1586871959-1211976415.1582553073 – Final reply by the Forum for Research and Policy in Communications (FRPC)*

The CRTC launched the above-noted proceeding on [3 March 2020](#). On [20 April 2020](#) it requested communications service providers to provide information by 1 June 2020, set an intervention deadline of 3 July 2020 and permitted final replies to be filed by 24 July 2020. On [30 November 2020](#) a Commission letter asked telecommunications and broadcast distribution companies twelve sets of questions related to their paper billing practices and permitted parties to the proceeding to file final replies on the responses by 15 January 2021. On [16 December 2020](#) a CRTC procedural letter extended the deadline for final replies on the responses to 20 January 2021.

The attached constitutes the Forum's final reply to the responses filed by the broadcasting companies in this proceeding in response to the 30 November 2020 letter from the CRTC. If you have any questions or encounter any difficulty in opening the document, please contact the undersigned.

Sincerely yours,

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Just ask: Whose interests are served by forcing millions of BDU subscribers to justify their desire for paper bills?

Call for comments – Provision of paper bills by communications service providers, Broadcasting and Telecom Notice of Consultation CRTC 2020-81 (14 April 2020)

Final reply by the Forum for Research and Policy in Communications (FRPC)

20 January 2021

M.L. Auer
Executive Director

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Executive summary

This proceeding addressed the paper-billing practices of broadcasting and telecommunications companies. The *Broadcasting Act* and *Telecommunications Act* currently require that paper bills be provided without charge – but do not explicitly state that subscribers must be able to receive paper bills if they wish. The CRTC asked whether subscribers should have this choice.

Following the close of the 2020-81 proceeding and the submission of replies the CRTC asked the companies twelve sets of questions.

While several smaller broadcasting distribution undertakings (BDUs, distributing television signals by cable or satellite) continue to offer current and prospective subscribers paper bills with an option to move to electronic bills, the major companies have already or appear to be planning to ‘migrate’ subscribers from paper to e-billing. The central issue is that larger BDUs are limiting not just subscribers’ choice over billing format, but their access to information about billing format.

The companies’ answers to the CRTC’s questions have not changed the Forum’s 2020 position. They provide no evidence to establish why current and prospective BDUs should be entitled to limit customers’ billing-format options, in part by limiting ease of access to information about billing formats. Nor do they explain why major companies’ rational interest in minimizing billing expenditures should be permitted to override BDU subscribers’ interests in and desire for the billing format of their choice.

I. Introduction

- 1 This proceeding asked whether subscribers of broadcasting distribution undertakings (BDUs) and telecommunications companies in Canada should be able to receive invoices from these undertakings in the format that best suits the individual subscriber.
- 2 On 30 November 2020 the CRTC asked communications companies the following twelve sets of questions, dealing with new customers' requests for paper billing, migration to e-billing, disconnection and information:

New customers	<ol style="list-style-type: none"> 1. Can new customers request paper billing as part of subscribing to any of your services? If so, which services? 2. Are new customers made aware of their billing options, if any?
Pre-migration to e-billing	<ol style="list-style-type: none"> 3. Are you planning to migrate customers to e-billing in the next year? If applicable, please provide <ol style="list-style-type: none"> a. a specific timeline and, b. copies of the documentation that will be used to inform customers of the planned migration.
Post-migration to e-billing	<p>Have you migrated customers from paper bills to e-billing? Specifically, have you initiated a process to switch customers to e-billing without customers explicitly requesting this change? If so, respond to questions 4 to 7</p> <ol style="list-style-type: none"> 4. Provide copies of each type of notification sent to customers in all formats used (including but not limited to hardcopy paper correspondence, email, and SMS) advising them of a mandatory transition to e-billing. <ol style="list-style-type: none"> a. Were customers notified that they could still request paper bills? If yes, were they informed using one of the notification methods noted above or by another means? Why was this approach chosen? b. If no, why was this decision made? 4. What was the procedure for handling inquiries or complaints from customers who contacted you to indicate that they did not want to be migrated to e-billing? 5. Provide call centre scripts, online support scripts, and any training documents regarding the mandatory transition to e-billing and responding to customer requests for paper bills. 6. Once transitioned to e-billing, are the previous bills available online? If so, <ol style="list-style-type: none"> a. for how many months? b. what level of detail is available for these past bills?
Disconnection	<ol style="list-style-type: none"> 8. How did you handle any non-payment of bills in the billing cycles following the transition to e-billing for customers? Specifically <ol style="list-style-type: none"> a. Explain how your transition plan included consideration for any customers who may have remained unaware that they were migrated to e-billing, despite notifications, and did not know how to access their e-bills. b. If a customer failed to pay their bill following this transition, how were customers notified of this non-payment? Were the notifications sent only by email or via the billing portal or did you reach out to any such customers using other methods such as by telephone? c. Did you take steps to monitor nonpayment in such circumstances to identify customers who might not be aware that they were no longer receiving paper bills? If so, what were they? 8. In instances where customers appear to have stopped paying their bills in the billing cycles following the transition to e-billing, how do you ensure that customers are notified of a potential disconnection?

	<p>9. Did you receive any complaints regarding disconnections that may have stemmed from customers being unaware of the fact that they were moved to e-billing? If so, how many?</p> <p>a. What was your standard process in handling these complaints?</p> <p>10. If you provided email notifications to a customer that they were being transitioned to e-billing and/ or you provided billing notifications via email following the transition, was there an option provided to the customer to confirm receipt/acknowledge receipt, which would indicate that the email had been successfully?</p> <p>a. If yes, in the case where no such receipt was received, what steps did you take to follow-up with the customer?</p> <p>b. If no, how did you ensure that the email address used to contact such a customer was valid and actively used or monitored by that customer?</p>
<p>Instances where paper billing is available after the migration to e-billing</p>	<p>12. In light of your response and/or intervention, in which you indicated that paper bills are available to customers who want them:</p> <p>a. Do you provide information about the availability of paper bills on your website? Is it provided through any other means?</p> <p>b. Explain the processes through which customers can switch back to paper billing, including every step on the customers’ part.</p> <p>c. Is there an option available in your online portal or other self-serve mechanism where customers can select paper billing?</p> <p>d. If customers require the assistance of your client services to do so (by phone or online chat) is there a fee to do so? If yes, what is that fee?</p>

3 After summarizing the replies provided to the CRTC’s questions in Part II, the Forum’s conclusions are set out in Part III.

II. Issues raised by 30 November 2020 questions

4 The Forum’s reply addresses the submissions of other interveners in the context of the CRTC’s twelve sets of questions, and solely with respect to the broadcasting distribution sector. It appears that all ten of the companies that submitted answers offer TV distribution services.

5 Harrison study: <http://dro.deakin.edu.au/eserv/DU:30036985/harrison-seekingstraight-2011.pdf>

A. New subscribers must ask for paper bills

6 The CRTC asked the companies whether new subscribers may ask for paper billing and the companies’ answers show that eight of the ten BDUs appear to have made e-billing the default for some or all new subscribers by requiring new customers to ask for paper billing. One – Bell, concerning Cablevision du Nord de Quebec) – said that e-billing is mandatory. Only Tbaytel offers paper billing by default to all new subscribers (and also offers the option of switching to e-billing). The remaining companies require subscribers to ask for paper bills. See Table 1.

Table 1 CRTC Q1. Can new customers request paper billing as part of subscribing to any of your services?

BDU	CRTC Q1. Can new customers request paper billing as part of subscribing to any of
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	your services? If so, which services?	
Bell	Yes, if customer requests and subject to “minor” exceptions; Cablevision du Nord de Quebec – e-billing is mandatory	Ask
Cogeco	“Customers can request paper billing as part of subscribing to any of Cogeco’s services.”	Ask
Eastlink	Yes – all services	Yes
Quebecor	Available for ‘legacy’ distribution services, not for digital	Limited by type of service
Rogers	“new customers can request paper billing only as an exception and our agents will accommodate based on the exception criteria” [bold font added]	Ask
SaskTel	Paper billing is default if services set up by telephone or in-store; new accounts set up online default to e-billing but paper available by contacting SaskTel or changing customers’ SaskTel account	Limited by order method
Shaw	Only if subscribing in stores, by telephone or via live chat Subscription through websites – e-billing only – customers must contact customer service to change to print	Limited by order method
Tbaytel	New customers receive paper bills and can opt for e-billing	Default
TekSavvy	Upon request	Ask
Telus	New customers can opt for paper	Ask
Shading:	e-billing is default	

B. Companies do not tell new subscribers about billing format options

- 7 Making e-billing the default means that even if a new customer might prefer paper they would not know that they might be able to receive paper bills if they ask for this format. Six of the ten BDUs (Bell, Cogeco, Eastlink, Rogers, Shaw and Telus) said they do not inform new customers of billing format options unless the customers ask, although in Eastlink’s case its default is already paper billing. Only three BDUs (Quebecor [for Videotron], Tbaytel and Telus) said they inform new customers of their billing options. See Table 2.

Table 2 CRTC Q2. Are new customers made aware of their billing options, if any?

BDU	CRTC Q2. Are new customers made aware of their billing options, if any?	
Bell	Customers who speak with an agent must ask for options	No - SMKTA
Cogeco	No – customers informed e-bills are the default; customers must ask	No - SMKTA
Eastlink	No – customers are told that paper bills are the default; Eastlink e-mails them to explain how to receive e-bills	No – default is paper
Quebecor	Yes	Yes
Rogers	No – default is e-billing; customers must ask for paper bills and if they meet Rogers’ criteria can receive paper	No - SMKTA
SaskTel	Yes – if they are SaskTel’s stores or on the phone with SaskTel; default is paper bills	Limitation
Shaw	No – customers must ask agents for paper bills or accessible formats to	No - SMKTA

	learn of other billing formats; e-bills are the default for customers who self-subscribe online and they must contact customer service after completing their order to request a change	
Tbaytel	Yes	Yes
TekSavvy	Yes; TekSavvy's "community support" site has a direct link for customers to ask for paper bills	Yes
Telus	No - default is e-billing; customers must ask for paper	No - SMKTA
Note: SMKTA: Subscriber must know to ask		
Shading	Customers must ask	

C. Plans for migration to e-billing (Q3)

- 8 Of the seven companies that published information about their plans for migration to e-billing, three (Bell, Rogers and SaskTel) said they planned to migrate customers to e-billing.

Table 3 **CRTC Q3. Plans to migrate customers to e-billing**

BDU	CRTC Q3. Are you planning to migrate customers to e-billing in the next year? If applicable, please provide a) a specific timeline and, b) copies of the documentation that will be used to inform customers of the planned migration.
Bell	Yes, since "Q2 2019, staggering the process across our various lines of business, companies and brands since that time." Dates and plans are redacted.
Cogeco	Redacted - unknown
Eastlink	No detailed plans and no specific timelines but is encouraging switch from paper to e-bills within the year
Quebecor	Redacted - unknown
Rogers	"Rogers implemented mandatory online billing during 2020 and has now completed three phases of this initiative, migrating different customer segments at different times. Our plan for next year is to continue to migrate small segments of customers not yet reached, including recent new customers who were defaulted to paper billing due to agent error, when they should have been placed on online billing. ... However, to be clear, customers who were part of earlier cohorts and have received exceptions to remain on paper billing on both Fido and Rogers will not be actively migrated. "
SaskTel	Yes, in Q1 2021
Shaw	"At present, Shaw does not have any specific plans to migrate any customers to electronic billing statements in the next year." – does this mean it may have plans for the following years?
Tbaytel	No
TekSavvy	No.
Telus	Redacted - unknown
Shading	Plan to migrate
Shading	Redacted

D. Notifications (Q4)

- 9 Three of the companies (Bell, Cogeco and Rogers) migrated customers to e-billing without providing explicit instructions on how customers could maintain paper billing. See Table 4

Table 4 CRTC Q4. Migration to e-billing - notification re paper billing option

BDU	<p>CRTC Introduction to Q4 – Q7</p> <p>Have you migrated customers from paper bills to e-billing? Specifically, have you initiated a process to switch customers to e-billing without customers explicitly requesting this change? If so, respond to questions 4 to 7</p> <p>4. Provide copies of each type of notification sent to customers in all formats used (including but not limited to hardcopy paper correspondence, email, and SMS) advising them of a mandatory transition to e-billing.</p> <p>a. Were customers notified that they could still request paper bills? If yes, were they informed using one of the notification methods noted above or by another means? Why was this approach chosen?</p> <p>b. If no, why was this decision made?</p>
Bell	<p>“Bell Canada and certain subsidiaries began migrating customers to e-billing in Q2 2019”</p> <p>“We have not expressly included instructions on how to maintain paper billing”</p> <p>Redacted</p>
Cogeco	<p>“A. Some, but not all, notifications, explicitly mentioned that customers could revert back to paper billing by updating their online billing profile.</p> <p>“Customer service representatives were also informed to complete a transfer back to paper billing at the customer’s request.”</p>
Eastlink	<p>“Not applicable. Eastlink has not migrated customers from paper bills to e-billing without customers explicitly requesting this change.”</p>
Quebecor	Redacted - unknown
Rogers	<p>“As described in our answers of June 1, 2020 and in Q3 above, both Rogers and Fido have initiated and/or completed processes to switch customers to online billing”</p> <p>When customers were switched to e-billing “the policy was mandatory. As a result we did not inform customers that they could still request paper bills.”</p> <p>“b) This approach was taken because our objective is to have as many customers as possible using the online billing platform to access their bills and perform other account functions.”</p>
SaskTel	<p>“Customers are notified that they can still request paper bills. In the letter and email communication that is sent to customers advising them that they will be migrated to paperless billing (eBill), SaskTel notes ‘if eBill is not for you, simply switch your billing preferences back to paper once you’ve registered for mySASKTEL and linked your account.’”</p>
Shaw	<p>“Shaw has migrated tranches of its Internet, television, and home phone customers to electronic billing statements. Affected customers were notified by messages printed on their paper bills issued 30 and 60 days prior to their transition date. Customers were clearly notified on all messaging that they could remain on paper billing by contacting Shaw’s customer support team.”</p> <p><i>“This is a courtesy call from Shaw to let you know that as of your June bill, you will be automatically switched to electronic billing and we’ll send you an invoice to the email</i></p>

	<i>you have provided us with. If you have any questions or prefer to remain on paper billing, we can be reached by chat via Shaw.ca, My Shaw App, or by phone at 1-888-472-2222. Thank you for choosing Shaw.” “This is a courtesy call from Shaw Direct Satellite TV to let you know that as of your August invoice, you will be automatically switched to electronic billing and we’ll send you an invoice to the email you have provided us with. If you have any questions or prefer to remain on paper billing, we can be reached by chat via Shawdirect.ca or by phone at 1-888-554-7827. Thank you for choosing Shaw Direct Satellite TV.”</i>
Tbaytel	“Tbaytel has not migrated customers from paper bills to e-billing and has not initiated such a process, therefore questions 4 to 7 are not applicable.”
TekSavvy	“Since TekSavvy has not migrated customers to e-billing, these questions are not applicable to TekSavvy.”
Telus	“In December 2018, TELUS migrated certain existing customers # # away from paper billing. Affected customers were advised of the pending change by email and bill insert, and also received both electronic and paper bills in the months leading up to the migration.”
Shading	No clear instructions for migration to e billing

E. Procedures for complaints about loss of paper billing (Q5)

- 10 Six companies that migrated customers to e-billing (Eastlink, Tbaytel and Teksavvy did not) described a process for customers to complain. The answer from Telus is unknown, as it was redacted. Quebecor noted that for some customers complaints made no difference, as the shift from paper to e-billing was permanent: “En ce qui a trait aux plaintes de clients qui ont des services Hélix hébergés sur notre plateforme numérique, encore une fois, la plupart des clients ont accepté le fait que seule la facture électronique soit disponible après avoir discuté avec un membre de notre équipe de service à la clientèle.” See Table 5.

Table 5 CRTC Q5. Inquiries and complaints process for customers preferring not to migrate to e-billing

BDU	CRTC Introduction to Q4 – Q7 Have you migrated customers from paper bills to e-billing? Specifically, have you initiated a process to switch customers to e-billing without customers explicitly requesting this change? If so, respond to questions 4 to 7 Q5. What was the procedure for handling inquiries or complaints from customers who contacted you to indicate that they did not want to be migrated to e-billing?
Bell	“We have trained our customer service representatives to honour any customer’s request to receive paper billing. As such, any customer who contacted our customer service team after receiving an e-bill migration notification in order to advise of their paper billing preference has been transferred back to paper billing without objection. In addition, a note would have been added to the customer’s account, which will ensure that they are not targeted for migration in the near future.”
Cogeco	“Customers could easily be reverted back to paper billing at their request.”
Eastlink	“Not applicable. Eastlink has not migrated customers from paper bills to e-billing

	without customers explicitly requesting this change.”
Quebecor	<p>Partially redacted</p> <p>“Bien que le taux de plaintes relatives au passage à la facture électronique soit très bas, nous avons tout de même établi une marche à suivre afin de traiter ces types de plaintes.</p> <p>“Pour les clients qui ont des services hébergés sur notre plateforme héritée, nous avons dans certains cas pris la décision de changer le format électronique pour le format papier. Afin que ces clients ne soient pas touchés par une éventuelle campagne de migration de la facture, nous avons attribué à leur compte une exclusion qui fait en sorte qu’ils seront exclus d’une future campagne de conversion à la facture électronique et conserverons ainsi leur facture dans un format papier. Toutefois, la plupart des clients, après discussion avec l’équipe responsable des plaintes, ont accepté le changement à la facture électronique.</p> <p>En ce qui a trait aux plaintes de clients qui ont des services Hélix hébergés sur notre plateforme numérique, encore une fois, la plupart des clients ont accepté le fait que seule la facture électronique soit disponible après avoir discuté avec un membre de notre équipe de service à la clientèle. ### ###.”</p>
Rogers	“The procedures for handling inquiries or complaints from customers who contacted us to indicate they did not want to be migrated to online billing was: 1) to explain to the customer that we no longer offer paper bills; 2) to promote the benefits of online billing; and 3) to offer to help the customer register for online billing if needed. If the customer service representative determines that the customer qualifies for the exceptions applicable to Rogers or Fido, the representative would follow the procedure for implementing the exception.”
SaskTel	“Should a customer contact SaskTel to indicate they do not desire paperless billing, SaskTel changes their account settings so that they will receive paper bills.”
Shaw	“We have trained our customer service representatives to honour any customer’s request to receive paper billing. As such, any customer who contacted our customer service team after receiving an e-bill migration notification in order to advise of their paper billing preference has been transferred back to paper billing without objection. In addition, a note would have been added to the customer’s account, which will ensure that they are not targeted for migration in the near future.”
Tbaytel	“Tbaytel has not migrated customers from paper bills to e-billing and has not initiated such a process, therefore questions 4 to 7 are not applicable.”
TekSavvy	“Since TekSavvy has not migrated customers to e-billing, these questions are not applicable to TekSavvy.”
Telus	Redacted – unknown
Shading	Relatively clear explanation of process

F. Scripts (Q6)

- 11 Scripts may help to ensure consistency in customer-service responses to customers. While many of the answers to this question were redacted, Shaw said that it had such scripts.

Table 6 **Scripts regarding paper and e-billing**

BDU	CRTC Introduction to Q4 – Q7 Have you migrated customers from paper bills to e-billing? Specifically, have you initiated a process to switch customers to e-billing without customers explicitly requesting this change? If so, respond to questions 4 to 7 Q6. Provide call centre scripts, online support scripts, and any training documents regarding the mandatory transition to e-billing and responding to customer requests for paper bills.
Bell	“We believe we have clearly communicated the benefits of e-billing to the paper bill customers we have transitioned to e-bills, but that transition has not been mandatory. At any point, a customer may contact our customer service representative and indicate that they wish to continue receiving a paper bill. At that time, the customer will be placed back onto paper billing and a note will be added to the customer’s account, which will ensure that they are not targeted for migration in the near future. “While we do not use call centre scripts, please see the Attachment for a copy of the ‘Remain on Paper’ guide used by our customer service representatives.”
Cogeco	Unknown - redacted
Eastlink	“Not applicable. Eastlink has not migrated customers from paper bills to e-billing without customers explicitly requesting this change.”
Quebecor	Unknown - redacted
Rogers	Unknown - redacted
SaskTel	Unknown - redacted
Shaw	“Shaw Wireline “Shaw provides its customer care teams with information about the steps they need to take to keep customers enrolled in paper billing following a customer request. ... “Shaw Direct “We provided our Shaw Direct agents with a complete set of instructions they can follow to maintain paper billing for any customer that requested not to switch to electronic billing statements or to switch affected customers back to paper bills following their transition.”
Tbaytel	“Tbaytel has not migrated customers from paper bills to e-billing and has not initiated such a process, therefore questions 4 to 7 are not applicable.”
TekSavvy	Questions 4 – 12 are applicable to CSPs that have migrated customers to e-billing. Since TekSavvy has not migrated customers to e-billing, these questions are not applicable to TekSavvy.
Telus	Unknown - redacted

G. Previous bills (Q7)

- 12 There do not appear to be any charges for customers to obtain previous bills after they shift to e-billing. See Table 7.

Table 7 **CRTC Q7. Availability of previous bills after shifting to e-billing**

BDU	CRTC Introduction to Q4 – Q7 Have you migrated customers from paper bills to e-billing? Specifically, have you
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	<p>initiated a process to switch customers to e-billing without customers explicitly requesting this change? If so, respond to questions 4 to 7</p> <p>CRTC Q7. Once transitioned to e-billing, are the previous bills available online? If so,</p> <p>a. for how many months?</p> <p>b. what level of detail is available for these past bills?</p>
Bell	<p>a. Each customer's online self-serve portal retains copies of issued bills for a period of 18 months.</p> <p>b. Our online self-service portals provide the customer with access to the full PDF version of the bill, identical to the paper version that would otherwise have been printed and mailed.</p>
Cogeco	<p>“Regardless of whether a customer was recently migrated to ebilling or has been receiving ebills for some time, all customers always had the possibility of accessing the past 18 bills on their MyAccount, in their complete version.”</p>
Eastlink	<p>“Not applicable. Eastlink has not migrated customers from paper bills to e-billing without customers explicitly requesting this change.”</p>
Quebecor	<p>“Un client qui a choisi la facture en format papier a tout de même accès aux mêmes factures en format électronique dans son espace client. Un client qui passe donc de la facture papier à la facture électronique, a accès à ses anciennes factures en consultant son espace client.</p> <p>“a. Peu importe que les services d’un client soient hébergés sur notre plateforme héritée ou sur notre plateforme numérique, les factures électroniques sont conservées durant un période de 36 mois. De plus, nous encourageons nos clients à sauvegarder leurs factures s’ils désirent les conserver pour une plus longue période.</p> <p>“b. La facture électronique est en tous points identique à la facture papier et est dans un format qui permet son impression intégrale.”</p>
Rogers	<p>“a) Once transitioned to online billing, customers have access to their previous 18 months of bills in both the online format bill and the traditional paper bill design format which is available to download and print as a PDF document.</p> <p>“b) The full and complete bills in both online and traditional paper bill design are available. In addition, for the same 18 months customers can also download their talk, text and data usage summary of the account by individual line in Excel document format. Finally, the same online platform also provides a 12 month payment history of the customer’s account.”</p>
SaskTel	<p>“a) Previous bills are available online once a customer is transitioned to e-billing. Customers can see their bills from the last 18 months online.</p> <p>“b) The bills available to customers online is an exact replica of the paper bill.”</p>
Shaw	<p>“All customers, regardless of whether they are subscribed to paper bills or electronic bills, have access to 24 months of invoices online through Shaw’s customer care portals. Customers can also contact Shaw’s customer care teams and request to have an invoice from the previous 24 months printed and mailed to them.</p> <p>“Old electronic invoices available through Shaw’s customer care portals are the same fully detailed bills that customers receive in the mail.”</p>
Tbaytel	<p>“Tbaytel has not migrated customers from paper bills to e-billing and has not initiated such a process, therefore questions 4 to 7 are not applicable.”</p>
TekSavvy	<p>Questions 4 – 12 are applicable to CSPs that have migrated customers to e-billing. Since TekSavvy has not migrated customers to e-billing, these questions are not applicable to</p>

	TekSavvy.
Telus	<p>“a. TELUS brand and Koodo customers can access 18 months of billing history online to file, save or print, all at no cost.</p> <p>“b. Electronic bills are complete detailed bills. ...In regards to wireline, they contain details such as Internet, TV and home phone usage and overage charges, taxes and service messages.”</p>

H. Non-payment disconnection following move to e-billing (Q8)

- 13 A concern about moving customers from paper to e-billing is that some customers may not have access to Internet- or mobile-based reminders. Of the seven companies engaged in migrating customers to e-billing, only two (Cogeco and Quebecor) appear to notify customers on paper. Three (Bell, Rogers and Sasktel) appear to rely on electronic means – SMS, e-mails and telephone – to remind customers who may not be aware that they have been migrated to e-bills, especially if they rarely use SMS, e-mails or their telephones (due to annoyance with auto-calling). It is unclear whether Shaw and Telus contact non-paying customers by mail. See Table 8.

Table 8 CRTC Q8. Customers’ non-payment after migration

BDU	<p>CRTC Q8. How did you handle any non-payment of bills in the billing cycles following the transition to e-billing for customers? Specifically</p> <p>a. Explain how your transition plan included consideration for any customers who may have remained unaware that they were migrated to e-billing, despite notifications, and did not know how to access their e-bills.</p> <p>b. If a customer failed to pay their bill following this transition, how were customers notified of this non-payment? Were the notifications sent only by email or via the billing portal or did you reach out to any such customers using other methods such as by telephone?</p> <p>c. Did you take steps to monitor nonpayment in such circumstances to identify customers who might not be aware that they were no longer receiving paper bills? If so, what were they?</p>
Bell	<p>A. We did not create a new non-payment process as part of the migration to e-billing, as our existing process already includes a number of friendly, informative touchpoints that encourage customers to pay their bills before suspension or a subsequent disconnection needs to be contemplated. We note, however, that we provide a notification for accounts which have been recently migrated to e-billing so that our customer service representatives can tailor the collections discussion for impacted customers accordingly.</p> <p>b. We utilize a multitude of communications tactics and touchpoints to contact customers whose bills are past due. #</p> <p># All of these steps are administered prior to our disconnection of a customer and in accordance with various Commission Codes of Conduct.</p> <p>c. We took steps to ensure that customers were not left unaware that they were migrated to e-billing. No additional monitoring was put in place, as the existing early stage collection process focuses on bill payment education. We again note that our</p>

	<p>representatives can easily identify which customers have been recently migrated to e-billing by way of an account notation.</p> <p># Filed in confidence with the CRTC.</p>
Cogeco	<p>“a. As explained above, multiple notifications (including, where applicable, paper, electronic and telephone voicemail) were put in place to ensure that customers migrated to ebilling would be notified of the change.</p> <p>“Furthermore, customer service representatives were informed of the migration and able to answer any questions that customers had on this topic, including the ability to switch back customers to paper bills at their request.”</p> <p>Remainder is largely redacted and therefore unknown</p>
Eastlink	<p>“Not applicable. Eastlink has not migrated customers to e-billing.”</p>
Quebecor	<p>“A. Notre processus de perception prévoit une notification supplémentaire par message texte et/ou par courriel pour les clients qui bénéficient de la facture électronique. Ainsi, un client qui accuserait un retard de paiement sur une première facture, recevrait cet avis supplémentaire de 10 à 12 jours suivant l’émission de la facture suivante.</p> <p>B. De plus, un client de la facture électronique qui accuse un retard de paiement de 60 jours reçoit un avis papier par la poste accompagné de la facture imprimée. Finalement, selon divers critères (le montant dû par le client ainsi que la cote de crédit de ce dernier), le client sera rejoint par téléphone dans la période comprise entre 60 et 90 jours de retard.</p> <p>C. Tous les comptes ayant fait partie d’une campagne de migration de la facture papier vers la facture électronique contiennent une note au dossier spécifiant que le client est sujet à de l’accompagnement pour consulter sa facture en ligne.</p>
Rogers	<p>a) Our transition plan relied on our existing credit operations processes and procedures to reach customers who missed their payment dates. It is normal course of operations that we inform customers if they have missed their payments to help ensure our customers do not fall behind their regular payments. Where we connected with customers that informed us that they did not receive their bill or were unfamiliar with how to access their online bills, our representatives directed them to the notifications informing them of the change, re-educated them on the steps required to ensure they would have access to their online bill and if necessary helped to register them for online billing. If requested by the customer and if the request aligned to our exception policy, our agents may have also switched the customers back to paper billing. In addition, if customers indicated their lack of payment was due to not receiving their bill, our credit analyst representatives were able to email customers a copy of their previous bill, outside of the existing process for bill reprint requests.</p> <p>b) The frequency and intensity of how we notify customers of a missed payment is dependent on an individual’s existing payment history with Rogers. We notify customers of missed payments through a mix of the following communications methods: SMS, emails, and auto-dialers. If a customer fails to respond to these communications methods, the reminders will progress through the collections path.</p> <p>c) We relied on our robust communications plan and tactics to ensure our customers were aware of the transition to online billing. As a result, and because we also have an established collections path to reach any customer who may have missed a payment we did not take specific steps to monitor nonpayment among customers that were transitioned.</p>
SaskTel	<p>“a) SaskTel’s process for handling collections of accounts remains the same, with a</p>

	<p>consideration added for customers who have recently been migrated to paperless billing (eBill). If late payment fees were incurred due to the eBill migration, the fees were waived if the customer contacted SaskTel and indicated the late payment was due to the eBill migration.</p> <p>b) Regular SaskTel collection communications was used to notify customers of non-payment. For wireline accounts, the process is as follows:</p> <ol style="list-style-type: none"> 1) 30/60/90 days arrears – messages on bill 2) 67 day – reminder call 3) 74 days – denial notice and service restriction (internet and TV) 4) Day 75 -87 – 2 final attempts calls 5) Day 88 - Suspend account'
Shaw	<p>a), b), and c) As described in Shaw(CRTC)30Nov20-4, above, Shaw attempted to notify customers of upcoming electronic billing migrations by repeated emails, phone calls, and printed messages on their paper bills. In some cases, Shaw also sent text messages to customers' mobile phones. Shaw's plan has been to use these varied forms of communication in parallel to minimize the number of customers who might remain unaware of their upcoming transition.</p> <p>Shaw did not create any new procedures for customers who failed to pay their bill following their transition to electronic billing. However, Shaw's established non-pay procedures include contacting the customer through multiple channels to make them aware that they have an outstanding balance on their account. In particular, Shaw places automated phone calls to customers at 30, 45, and 90 days past their payment due date. Shaw also sends emails to customers who have not made their payments to notify them of their outstanding balance.</p>
Tbaytel	<p>Question 8 is not applicable because Tbaytel did not transition customers to e-billing as stated above.</p>
TekSavvy	<p>Questions 4 – 12 are applicable to CSPs that have migrated customers to e-billing. Since TekSavvy has not migrated customers to e-billing, these questions are not applicable to TekSavvy.</p>
Telus	<p>"TELUS' takes a proactive approach to customer notification regarding non-payment of bills. Specifically, at least ## notifications are sent to a non-paying customer prior to suspension, including payment reminders and the 14 day and 48 hour notifications as required by the Wireless Code, the Internet Code and the Deposit and Disconnection Code."</p> <p>...</p> <p>"Following disconnection, four additional notifications are sent via SMS and/or email to provide customers with options for reconnection. Upon payment, a customer's service is typically restored within an hour.</p> <p>"In response to the COVID-19 pandemic, all collections activities were delayed until May 6, 2020, and all disconnections were delayed until July 2, 2020. An email notification was sent to all customers in collections to assure them that they would not be disconnected for non-payment at that time and provided further information. In addition, flexible payment plans were made available to customers and late payment charges and/or disconnection fees were waived."</p>
Shading	<p>Electronic or telephone only</p>

I. Customer notification of disconnection following transition to e-billing (Q9)

- 14 Of the ten companies eight provided an unredacted answer to this question, and of these, four did not clearly state how they ensured that non-paying customers were aware that they might be disconnected. See Table 9.

Table 9 CRTC Q9. Assurance that customers are notified of a potential disconnection

BDU	CRTC Q9. In instances where customers appear to have stopped paying their bills in the billing cycles following the transition to e-billing, how do you ensure that customers are notified of a potential disconnection?
Bell	A. Please see our response to Bell Canada(CRTC)30Nov20-8b. We utilize a multitude of communications tactics and touchpoints to contact customers whose bills are past due. # # All of these steps are administered prior to our disconnection of a customer and in accordance with various Commission Codes of Conduct.
Cogeco	Redacted - unknown
Eastlink	“Not applicable. Eastlink has not migrated customers to e-billing.”
Quebecor	Tel qu’expliqué dans notre réponse à la partie b de la demande de renseignements Québecor Média(CRTC)30-nov2020-8, tous les clients qui accusent un retard de plus de 60 jours sur le paiement de leur facture reçoivent une lettre par la poste ainsi que la facture imprimée la plus récente. Si, malgré l’envoi de cette première lettre, le solde de la facture demeure impayé, nous procédons à des étapes supplémentaires pour rejoindre le client et ultimement, nous lui enverrons une seconde lettre accompagnée de la plus récente facture imprimée en lui précisant les conséquences de déconnexion de son service advenant le non-acquittement du solde. Cette seconde lettre est envoyée au bout de 90 jours de retard.
Rogers	“As noted above, we have existing collections path to ensure we contact customers who have missed their payments. No new path was created following the transition to online billing. Our collection processes comply with applicable consumer Codes (the Wireless Code, the Internet Code and the Deposit and Disconnection Code). Therefore should customers persist in missing their payments, we would only suspend and/or disconnect the account in accordance with the requirements established by those Codes.”
SaskTel	See SASKTEL(CRTC)30NOV20-8 NC 2020-81. For wireline accounts, the 60-day bill message indicates a service interruption date and at 74 days, the customer receives a denial notice letter. For wireless accounts, the customer receives the 60-day bill message which indicates a service interruption date. After exhausting the communication process described in SASKTEL(CRTC)30NOV20-8 NC 2020-81 regarding non-payment, wireline accounts are suspended on the date that was communicated to be the customer’s service interruption date. 7 days after the service interruption date, the account is closed. Here is an example of the message a customer may receive: “Our records indicate your account is not 60 days overdue. To avoid suspension of your SaskTel services, full payment must be received before December 13, 2020. A restore fee of \$35 per subscription will apply. Your account will be terminated 7 days after service has been suspended. If a deposit was paid, it will be applied to the outstanding balance. Full payment of the account plus

	<p>repayment of the deposit will be required to avoid termination. Early contract cancellation fees may apply. To discuss payment arrangements please call 1-888-869-2455. Unpaid balances will be sent to a collection agency.”</p> <p>In the above instance, on 13 December the customer’s services would be suspended. If payment in full or a payment arrangement is not made after 13 December, the customer’s account would close on 23 December. If the situation above happened to customer that had been migrated to paperless billing and the customer called in to explain they had not received a bill and that was the reason why their account was in arrears, SaskTel would reverse late payment fee and would waive the \$35 restore fee.</p>
Shaw	See Shaw’s answer to Shaw(CRTC)30Nov20-8, above. In all cases of non-pay, Shaw reaches out to its customers multiple times through multiple channels in order to make them aware of a potential disconnection of their services.
Tbaytel	Question 9 is not applicable because Tbaytel did not transition customers to e-billing as stated above.
TekSavvy	Questions 4 – 12 are applicable to CSPs that have migrated customers to e-billing. Since TekSavvy has not migrated customers to e-billing, these questions are not applicable to TekSavvy.
Telus	<p>See TELUS’ response to question 8.</p> <p>“TELUS’ takes a proactive approach to customer notification regarding non-payment of bills. Specifically, at least ## notifications are sent to a non-paying customer prior to suspension, including payment reminders and the 14 day and 48 hour notifications as required by the Wireless Code, the Internet Code and the Deposit and Disconnection Code.”</p> <p>...</p> <p>“Following disconnection, four additional notifications are sent via SMS and/or email to provide customers with options for reconnection. Upon payment, a customer’s service is typically restored within an hour.</p> <p>“In response to the COVID-19 pandemic, all collections activities were delayed until May 6, 2020, and all disconnections were delayed until July 2, 2020. An email notification was sent to all customers in collections to assure them that they would not be disconnected for non-payment at that time and provided further information. In addition, flexible payment plans were made available to customers and late payment charges and/or disconnection fees were waived.”</p>

J. Complaints about disconnection due to lack of awareness (Q10)

15 Of the seven companies that have migrated customers from paper to e-billing, two offered redacted information (Cogeco and Telus), two said they do not track the subject of the complaints they receive (Sasktel and Shaw) and Bell, Quebecor and Rogers did not clearly state whether they had received complaints. Table 10

Table 10 CRTC Q10. Complaints about disconnection from unaware customers

BDU	<p>CRTC Q10. Did you receive any complaints regarding disconnections that may have stemmed from customers being unaware of the fact that they were moved to e-billing? If so, how many?</p> <p>a. What was your standard process in handling these complaints?</p>
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Bell	Our Client Care team has not reported any spikes in volumes of complaints associated with these campaigns, perhaps because all of our customers have the ability to remain on paper bill upon request.
Cogeco	Unknown - redacted
Eastlink	“Not applicable. Eastlink has not migrated customers to e-billing.”
Quebecor	Vidéotron n’a reçu aucune plainte concernant des déconnexions qui auraient pu provenir de clients ignorants qu’ils étaient passés à la facturation électronique.
Rogers	<p>While we tracked complaints with respect to our online billing migrations for both Rogers and Fido, we did not record any complaints regarding disconnections that may have been related to this. However, we have a record of three complaints that were escalated to the CCTS where the customer complained that their account was suspended due to not receiving their bill and one complaint where the customer complained that their account was disconnected due to this (combined across both Rogers and Fido).</p> <p>a) These complaints were handled by our standard complaint escalation methods, without any specific process related to this topic. As each complaint was different and may have addressed issues not strictly related to online billing, the resolutions provided were different but included a combination of returning the customer to paper billing, applying goodwill credits to the account or waiving an entire account balance.</p>
SaskTel	<p>SaskTel does not record the subject matter of a call as a complaint if it is resolved at the first point of contact unless it is deemed appropriate by the manager or requested to be shared as feedback by the customer. It is estimated that SaskTel receives about # escalations per week that our management team resolves. These escalations could involve customers that were disconnected as a result of them being transitioned to paperless billing (eBill), or it could also involve other complaints with respect to eBill. To date, SaskTel has received # complaint from the Commission for Complaints for Telecom-Television Services (CCTS), and although the subject was about the migration to paper bills, it was not due to the fact the customer was unaware of the migration, nor regarding a disconnection resulting from the migration to paperless billing.</p> <p>A) The standard process is to deal with the complaint based on the specific situation that applies to the customer. Customers receive a one-on-one response to their individual concern. Complaints are processed, addressed, and resolved by SaskTel based on the means by which they were received.</p> <p>Remainder of this answer is redacted.</p>
Shaw	<p>Shaw is unable to determine the number of migrated customers who had their service disconnected due to non-pay because they were not aware that their billing format changed. However, to provide the Commission with some insight into our customers’ response to electronic billing, between April 1, 2020 (when Shaw wireline started its first campaign to transition customers from paper to electronic bills) and mid-October 2020, Shaw’s Executive Office received # # complaints from Shaw wireline and Shaw Direct customers concerned about electronic billing. Additionally, over the same period, Shaw’s front-line agents escalated # ___# complaints from Shaw wireline and Shaw Direct customers to their supervisors that concerned electronic bills or paper bills in some way. These complaints encompassed all aspects of customers’ paper or electronic billing experience; they did not necessarily concern the transition from paper billing to electronic billing. To put these numbers into perspective, Shaw wireline’s June 2020</p>

	<p>campaign alone targeted # _____ # paper billing customer accounts for transition to electronic billing.</p> <p>If a customer whose services had been disconnected contacted Shaw to explain that they had not paid their bills because they were unaware that they were moved to electronic billing, as standard practice Shaw’s Executive Office would first reverse any late payment or non-pay disconnection fees that the customer might have incurred. We would then restore the customer’s services, advise the customer of the amount owing, and provide payment timelines. Finally, we would verify the customer’s preferred billing format. For customers who preferred to stay on electronic bills, Shaw agents would verify or update the email address on file; our agents would switch other customers back to paper billing.</p> <p># Filed in confidence with the CRTC</p> <p>A) The standard process is to deal with the complaint based on the specific situation that applies to the customer. Customers receive a one-on-one response to their individual concern. Complaints are processed, addressed, and resolved by SaskTel based on the means by which they were received.</p> <p>Remainder of this answer is redacted.</p>
Tbaytel	Tbaytel received no such complaints because no customers were moved to e-billing without initiating the switch directly and by choice.
TekSavvy	Questions 4 – 12 are applicable to CSPs that have migrated customers to e-billing. Since TekSavvy has not migrated customers to e-billing, these questions are not applicable to TekSavvy.
Telus	<p>As of January 2020, #</p> <p>#</p> <p>a. Pursuant to the CCTS’ Procedural Code, TELUS and Koodo attempt to resolve the matter with the customer, and report back to the CCTS within 30 days as to whether the complaint has been resolved. Unresolved complaints are then investigated by the CCTS. In response to these complaints, #</p> <p># In response to the COVID-19 pandemic, all collections activities were delayed until May 6, 2020, and all disconnections were delayed until July 2, 2020. In addition, flexible payment plans were made available to customers and late payment charges and/or disconnection fees were waived.</p>
Shading	Redacted in whole or in part

K. Customer confirmation of e-mail notification (Q11)

- 16 Of the seven companies engaged in paper to e-billing migration, two companies offered redacted answers that could not be reviewed and the remaining five confirmed that they did not receive confirmation of receipt by customers of e-mails notifying them of their potential disconnection.

Table 11 CRTC Q11.

Telus	Telus Q11. If you provided Telus notifications to a customer that they were being transitioned to e-billing and/ or you provided billing notifications via Telus following the transition, was there an option provided to the customer to confirm receipt/acknowledge receipt, which would indicate that the Telus had been
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	<p>successfully?</p> <p>a. If yes, in the case where no such receipt was received, what steps did you take to follow-up with the customer?</p> <p>b. If no, how did you ensure that the Telus address used to contact such a customer was valid and actively used or monitored by that customer?</p>
Bell	<p>No differently than in the case of any other service-themed communication provided via Telus to accounts for which we have an Telus address on record, we did not provide our customers with the option to confirm receipt of their Telus notification(s) regarding the planned e-bill migration. We do however monitor the success rates of our electronic marketing campaigns, specifically through delivery and open rates. If an Telus failed to be delivered to a customer, through either a hard or soft bounce back, we did not migrate that customer to e-billing.</p>
Cogeco	Redacted – unknown
Eastlink	“Not applicable. Eastlink has not migrated customers to e-billing.”
Quebecor	<p>Les notifications envoyées par Vidéotron à ses clients dans le cadre des campagnes de migration vers la facture électronique ne sont pas bidirectionnelles. Nous n’attendons aucune réponse de la part des clients afin qu’ils confirment qu’ils ont pris connaissance de nos avis, qu’ils soient en format papier ou électronique.</p> <p>a. Non-applicable.</p> <p>b. À chacun de leurs contacts avec les clients, nos conseillers de service à la clientèle procèdent à une mise à jour des informations de communication. L’adresse courriel des clients est donc mise à jour dans ce contexte. De plus, pour consulter sa facture en ligne, un client doit s’inscrire à son espace client. Or un client qui s’inscrit à son espace client doit mettre à jour son adresse courriel. Nous sommes donc assurés que l’adresse à laquelle nous envoyons les notifications de facture est fonctionnelle et utilisée par le client.</p>
Rogers	<p>As noted above, we used combinations of the following communication methods to notify and remind our customers about the upcoming transition to online billing: bill message, Telus, SMS, Telus pop up messages and in some cases, direct mail or outbound calls.</p> <p>a) The various Telus notifications that we send to our customers for a variety of purposes do not include a received confirmation/acknowledgment option and the Telus used for this particular initiative were no different. However, as noted above, our communications plan was very comprehensive and included multiple notifications using different communications methods to ensure our customers were well informed about the transition.</p> <p>b) We send Telus to Telus addresses provided to us by our customers. We ask customers to ensure that the Telus address they provide to us remains up-to-date and current and to let us know if it changes.</p>
Telus	<p>The customer was not provided with an option to confirm receipt of an Telus notification regarding their migration to paperless billing (Telus). Telus does not have read receipts enabled for outbound customer Telus communication, nor does Telus have a process in place to monitor this information.</p> <p>a) Not applicable.</p> <p>b) Telus uses the Telus addresses that have been provided by the customers for all Telus migrations. At this time, Telus does not have a verification method to ensure that</p>

	the Telus address provided is one that is actively used or monitored by the customer.
Shaw	Shaw did not provide a response option to the Telus messages that it sent to customers informing them of their upcoming transition to electronic billing. However, as described in previous responses, Shaw reached out to affected customers using several different forms of communication to notify them of the change. Shaw sent Telus notifications to an Telus address that the customer themselves had provided. Shaw also contacted all affected customers by automated phone messages to ensure that customers who do not frequently check their Telus would be aware of the pending change.
Tbaytel	Question 11 is not applicable.
TekSavvy	Questions 4 – 12 are applicable to CSPs that have migrated customers to e-billing. Since TekSavvy has not migrated customers to e-billing, these questions are not applicable to TekSavvy.
Telus	Redacted – unknown
Shading	Confirm receipt option not available


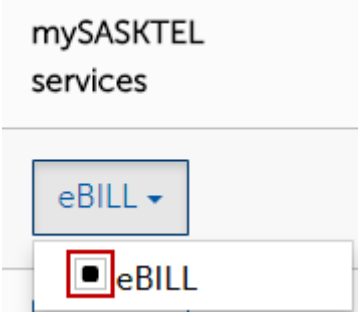
L. Availability of paper billing information (Q12)

- 17 Neither Bell, Rogers nor Telus provides clear information on their websites for customers that want to switch from e-billing to paper billing. While SaskTel provides information on this point on its website, its answer does not clearly state that it offers its customers clear guidance on switching from e-billing to paper billing.

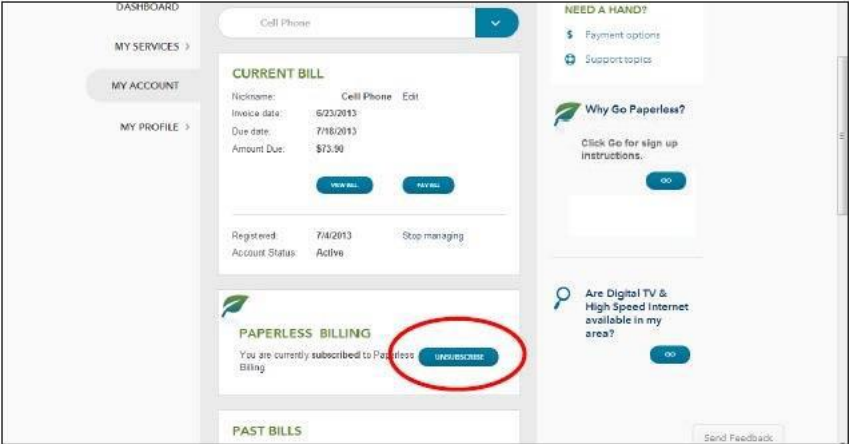
Table 12 CRTC Q12. Information about and ease-of-use of e-billing to paper billing

BDU	CRTC Q12. In light of your response and/or intervention, in which you indicated that paper bills are available to customers who want them: a) Do you provide information about the availability of paper bills on your website? Is it provided through any other means? b) Explain the processes through which customers can switch back to paper billing, including every step on the customers’ part. c) Is there an option available in your online portal or other self-serve mechanism where customers can select paper billing? d) If customers require the assistance of your client services to do so (by phone or online chat) is there a fee to do so? If yes, what is that fee?
Bell	a. We do not provide information about the availability of paper bills on our website. Customers are made aware of their billing options, upon request, when speaking with one of our customer service representatives. b. Please see our response to Bell Canada(CRTC)30Nov20-5. c. Currently, paper billing can only be selected online for certain customer segments. The easiest way for a customer to request paper billing is by contacting one of our customer services representatives. d. We have never charged any customers a customer service fee for fulfilling their request to remain on paper billing and every customer may elect to receive all of their bills in paper at no charge.
Cogeco	A Customers can find information regarding the possibility of unsubscribing from ebilling and reverting back to paper bills on Cogeco’s website, in the FAQ section: https://www.cogeco.ca/en/faq/how-do-i-unsubscribe-ebilling-57241

	<p>b Customers can switch back to paper billing by unsubscribing via their MyAccount portal or by contacting customer service representatives.</p> <p>c Yes, there is an option where a customer can unsubscribe from e-billing and begin receiving paper bills, by selecting the option on their MyAccount portal.</p> <p>All the steps to follow are clearly explained on Cogeco’s website in the FAQ section at: https://www.cogeco.ca/en/faq/how-do-i-unsubscribe-ebilling-57241</p> <p>d. There is no fee charged to the customer.</p>
Eastlink	<p>a) As part of our efforts to be environmentally conscious, Eastlink promotes the availability of e-billing on our website. Customers are informed about the availability of paper bills upon request.</p> <p>b) – c) Customers can request to switch to paper billing by speaking to one of our Customer Service Representatives who will process the request on the customer’s behalf.</p> <p>In addition, TV, Internet, and Phone customers can use our online portal to change their billing preferences at any time by selecting “Profile” and selecting whether they want to receive “electronic” or “paper bill”.</p> <p>d) Eastlink does not charge for customer support interactions of any kind.</p>
Quebecor	<p>a. Vidéotron informe ses clients de la possibilité d’opter pour la facture papier dans l’espace client des services hébergés sur la plateforme héritée.</p> <p>b. Un client qui souhaite obtenir une facturation papier peut en faire la demande en téléphonant à notre service à la clientèle. Le conseiller fera le changement du type de facturation dans le compte du client. À noter, tel qu’expliqué précédemment, que la facture papier n’est disponible que pour les comptes de services hébergés sur notre plateforme héritée.</p> <p>c. L’espace client des services hébergés sur notre plateforme héritée offre la possibilité aux clients de choisir leur type de facturation.</p> <p>d. Vidéotron ne facture aucun frais pour la modification du type de facturation.</p>
Rogers	<p>a) No, we do not provide information about the availability of paper bills on our website or through other means.</p> <p>b) Paper bills are only available on an exception basis through requests to our customer service representatives. If a customer qualifies for an exception, our representative will fulfil the steps required to ensure the customer is placed on paper billing.</p> <p>c) No.</p> <p>d) No.</p>
SaskTel	<p>a) Yes, the information is outlined in several different places on the SaskTel website:</p> <ul style="list-style-type: none"> • Going Paperless website page (see SASKTEL(CRTC)30NOV20-12 NC 2020-81 ATT 1). • There is an eBill support hub on our support pages (see SASKTEL(CRTC)30NOV20-12 NC 2020-81 ATT 2) and • An article on our support pages to support customers through Cancelling eBill (see SASKTEL(CRTC)30NOV20-12 NC 2020-81 ATT 3). <p>b) There are several processes through which customers can switch back to paper billing. Customers can call SaskTel, visit a store or a dealer, or initiate a chat with an online agent and request to switch to paper billing. Customers can also remove it themselves through the mySASKTEL portal, and to do so, they must:</p>

	<p>Log in to mySASKTEL in a web browser on a computer, phone, or tablet. These steps will not work in the mySASKTEL app.</p> <ol style="list-style-type: none"> Under Manage accounts, click Personal or Business. On a phone or tablet, with mySASKTEL open in a browser app such as Safari or Chrome (not in the mySASKTEL app), tap the menu icon  (top right), then tap Manage Accounts > Personal or Business and Click Edit accounts. Under mySASKTEL services, click the eBILL dropdown and then click the box next to eBILL to empty it.  <ul style="list-style-type: none"> ○ A filled-in box means customers want the service; an empty box means customers don't want the service ○ Customers will see a pop-up message that says, "Once you unsubscribe to eBILL you will receive a paper bill." ○ Click Ok <ol style="list-style-type: none"> Repeat step 4 for each account customers want to cancel eBILL. Click Done. <p>Customers are reminded that removing eBILL from an account does not mean cancelling that account or service with SaskTel. It only stops the online billing for that account. Once customers have removed eBILL from an account, customers cannot view or pay that bill online and they will start receiving the paper bill for that account. Customers are also reminded to make sure their billing address is correct before removing eBILL. If customers need to check or update their billing address, they are directed to Start a chat, if it's available on the right side of the page or call 1.800.SASKTEL (1.800.727.5835).</p> <p>c) By using mySASKTEL on a web browser (as described above in question B), customers can remove themselves from eBill and will be put back on paper billing.</p> <p>d) There is no fee to change a customer from eBill back to a paper bill.</p>
<p>Shaw</p>	<p>Shaw Wireline</p> <p>a) Shaw maintains a Billing FAQs customer support article on its website. The support article explains How do I get my bill? You can get paper bills mailed to you or opt-in to eBilling to get them on your email. For more information, check How to subscribe to eBills.</p>

	<p>b) Shaw customers can contact our customer care team by telephone or live website chat to enroll in paper billing. Customers can also visit any Shaw store and ask to revert to paper bills. In any case, Shaw’s customer care agents or retail specialists will change the customer’s billing preference back to paper bills and will flag their account so they are not affected by any future electronic billing migrations.</p> <p>Shaw customers can also change their billing format through Shaw’s My Shaw customer care portal, either online or through the My Shaw smartphone application. Customers login to the portal, navigate to the “My Bills” section, and then click on the “unsubscribe” button in the eBill section.</p> <p>c) As described above, customers can change their billing preferences themselves in Shaw’s customer care portal. The following image shows a screenshot of the “My Bills” section of My Shaw, including the unsubscribe button that would revert the customer to paper bills.</p> <p>d) Shaw does not charge any fees for customer support.</p> <p>...</p> <p>Shaw Direct</p> <p>a) Shaw Direct’s customers can view information about electronic and paper billing in the “My Bills” webpage in Shaw Direct’s customer care portal. Customers can change their billing preference directly on this webpage. Shaw Direct also maintains an instructive eBill and FAQ support page describing the exact steps that customers need to take in the portal to change their billing preference.</p> <p>Customers can also contact Shaw Direct’s customer care agents through any support channel to discuss our available billing formats, including paper bills.</p> <p>b) Customers can contact Shaw Direct’s customer care team by telephone, email, live website chat, or letter mail and request to switch back to paper bills. Customers can also create a support ticket directly on Shaw Direct’s website requesting a change back to paper bills.</p> <p>Finally, customers can change their billing format themselves through Shaw Direct’s customer care portal. Customers simply log into Shaw’s customer portal, My Shaw Direct, click on the “My Bills” link, and then click the “unsubscribe from eBill” option. This process is described in step-by-step detail on Shaw Direct’s eBill and FAQ support page.</p> <p>c) As described above, customers can change their billing preferences themselves in Shaw Direct’s customer care portal.</p> <p>d) Shaw does not charge any fees for customer support.</p>
<p>Tbaytel</p>	<p>a. Because customers are automatically signed up for paper bills, Tbaytel does not provide detailed information about the availability of paper bills on our website; however, information regarding all billing and payment options is available on the website as well as in collateral available at all retail locations.</p> <p>b. To switch back to paper billing, customers can call into Tbaytel’s Customer Care department and a representative can make the change for them or they can also use the self-serve option available to them.</p> <p>To do this, a customer simply has to log into their myTbaytel account and select the ‘Unsubscribe’ button under ‘Paperless Billing’ under the ‘My Account’ tab as demonstrated in the image below:</p>

	 <p>c. Customers are automatically provided with paper bills unless they choose the paperless option so there is no option to select paper billing. Alternatively, customers who are subscribed to e-billing can switch back to paper billing using Tbaytel’s myTbaytel portal by unsubscribing to the paperless billing option.</p> <p>d. There is no fee for customers who require assistance.</p>
<p>TekSavvy</p>	<p>Questions 4 – 12 are applicable to CSPs that have migrated customers to e-billing. Since TekSavvy has not migrated customers to e-billing, these questions are not applicable to TekSavvy.</p>
<p>Telus</p>	<p>As stated in TELUS’ intervention, TELUS’ billing policy is focused on electronic billing. As such, TELUS encourages its customers to receive their bills electronically. TELUS’ website therefore explains its electronic billing policy and provides answers to frequently asked questions regarding electronic billing. The webpage is available here: https://www.telus.com/en/on/support/article/switch-to-paperless-billing. Further information regarding TELUS’ billing terms are provided online via the service terms. For example, Internet Access service terms are available here: https://www.telus.com/en/ab/support/article/internet-access-service-terms.</p> <p>...</p> <p>b. TELUS brand customers can switch back to paper billing by calling a TELUS representative or by accessing the My TELUS web or app portal. A customer may also request a call from a live agent via the online TELUS Assist tool. To revert back to paper billing via the My TELUS portal, a TELUS brand customer must log into their My TELUS account via the web or app portal. The customer can then toggle between electronic and paper billing. If a customer is not already registered for a My TELUS account, they can register via the web or app portal. A wireless customer can download the app on their mobile phone through the relevant app store or by text.</p> <p>...</p> <p>c. A TELUS brand customer can select their billing preference (paper or electronic billing) in the My TELUS app or web portal. See above response above to question 12(b). Koodo provides electronic billing only and therefore does not provide an online mechanism.</p> <p>d. There is no fee for either TELUS brand or Koodo customers.</p>
<p>Shading</p>	<p>Somewhat unclear</p>

III. Conclusions

- 18 A somewhat positive result from the companies' answers to the CRTC's 30 November 2020 questions is that they said that customers whom they have migrated to e-billing may access their previous bills online for the preceding 18 months or more without charge (Q7). It is unclear, of course, how long this commitment will last.
- 19 As for the remaining replies, these establish a Canadian communications Catch-22. That is, major BDUs do not inform new customers of billing formats unless they ask about this issue (answers to Q2), but then require new customers to know that they will not receive their bills in a paper-based format so that they can then ask for that paper-based format (answers to Q1). Briefly, you must know to ask, but you must ask to know.
- 20 Then, when customers learn they have been "migrated" - that is, their billing-format choice has been disregarded - they must figure out for themselves how to re-establish paper billing (Q4, Q5) either online if they are online (Q12) or while negotiating customer-service representatives who may not themselves have received clear instructions on this matter (Q6). Unfortunately for customers who are not online, who are only rarely online or who are not Internet literate, Canada's major BDUs plan to continue to arbitrarily shift customers from paper to e-billing over the coming years (Q3).
- 21 When BDUs move to disconnect customers who may not realize that their bills are online only, they notify such customers electronically or by telephone (Q8), rather than in print. They do not confirm that customers actually received the electronic or telephonic notifications (Q9), and in particular do not confirm e-mail receipt of disconnection notices (Q11).
- 22 Despite their stature in the communications sector it is unclear whether Canada's largest BDUs track complaints to determine problems (Q10) such as the impact of not clearly explaining that paper bills must be requested and often justified.
- 23 This evidence leaves the Forum's position in its 2020 submissions in this proceeding unchanged. No evidence has been presented to establish why current and prospective BDUs should be entitled to limit customers' billing-format options. Major BDUs scarcely attempt to inform existing and prospective subscribers about these options, likely leaving some subscribers unaware that in waiting for a paper bill that will never come, they are risking disconnection. No arguments have been presented to explain why - in Canada's 'single broadcasting system', to paraphrase section 3(2) - BDUs' rational interest in minimizing their billing costs should be permitted to override customers' right to make informed choices, as well as BDU subscribers' interests in and desire for the billing format of their choice.

* * * End of document * * *