



Broadcasting and Telecom Decision CRTC 2013-261

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Ottawa, 23 May 2013

CISC Business Process Working Group – Consensus report BPRE083a and non-consensus report BPRE083b regarding the customer transfer process

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In this decision, the Commission approves the CISC Business Process Working Group's (the working group) proposed modifications to the local service request process. The Commission also approves the working group's recommendation that television and Internet service disconnection requests be excluded from the incumbent local exchange carriers' competitor quality of service measurements. The Commission denies the working group's recommendation to withdraw the determination that wireless service cancellations may be completed through an agent.

The Commission determines that the changes to the customer transfer process outlined in consensus report BPRE083a, as well as any new process(es) related to the cancellation of wireless services and contracts, are to be implemented within 12 months of the date of this decision.

Introduction

1. In *The customer transfer process and related competitive issues*, Broadcasting and Telecom Regulatory Policy CRTC 2011-191, 18 March 2011 (Broadcasting and Telecom Regulatory Policy 2011-191), the Commission set out measures to simplify the procedure to be followed when customers wish to change their telecommunications and/or broadcasting service provider. Under these measures, a customer's new service provider may cancel service from the current provider on the customer's behalf (i.e. acting as the customer's agent).
2. On 21 June 2012, the Business Process Working Group (the working group) of the CRTC Interconnection Steering Committee (CISC) submitted for Commission approval consensus report BPRE083a – *Customer Transfer Process* (the consensus report). In that report, participants in the working group assessed solutions to implement the Commission's determination regarding service cancellation on behalf of a customer, as set out in Broadcasting and Telecom Regulatory Policy 2011-191.
3. In the consensus report, the working group
 - proposed enhancements to the existing process used for customer transfers;

- recommended that cancellation requests related to television and Internet services be excluded from the incumbent local exchange carriers' (ILECs) competitor quality of service measurements;¹ and
 - recommended that the Commission withdraw its determination that wireless services may be cancelled by an agent.
4. On 21 September 2012, the working group submitted non-consensus report BPRE083b – *Implementation Date for Customer Transfer Process* (the non-consensus report) regarding the date by which all service providers must implement the changes to the customer transfer process recommended in the consensus report.
 5. The Commission has identified the following issues to be addressed in this decision:
 - I. Should the Commission approve the working group's proposed enhancements to the process for customer transfers?
 - II. Should television and Internet service cancellation requests be excluded from the ILECs' competitor quality of service measurements?
 - III. Should the Commission withdraw its determination that wireless services may be cancelled by an agent?
 - IV. By what date should the changes to the customer transfer process be implemented?
- I. Should the Commission approve the working group's proposed enhancements to the process for customer transfers?**
6. In the consensus report, the working group proposed to enhance the existing process used to transfer customers who are switching from one wireline or wireless telephone service provider to another (excluding wireless-to-wireless), which is known as the local service request process. Specifically, the working group proposed to introduce new line activity codes so that service providers can also cancel television and Internet services. The working group noted that the enhanced local service request process will be documented in the Canadian Local Ordering Guidelines (C-LOG) if it is approved.
 7. The consensus report recommended that service providers that do not use the local service request process negotiate alternative arrangements for service cancellation. The working group indicated that it would develop a standard spreadsheet template for such arrangements.

¹ Under the Commission's rate rebate plan for competitors, the performance of ILECs in providing wholesale services to their competitors is assessed against specific competitor quality of service indicators. If results do not meet the set standard for a given indicator, the ILEC must issue rebates to affected competitors.

8. The Commission considers that the proposed enhanced local service request process will standardize the process for service providers that already use or will use local service requests to cancel customers' television and Internet services. Accordingly, the Commission **approves** the working group's proposed modifications to the local service request process and changes to the C-LOG to support the automated processing of television and Internet service cancellation requests for service providers that use the local service request process.
9. For service providers that do not use the local service request process, the Commission finds that it is reasonable to permit them to negotiate alternative arrangements for the processing of cancellation requests. The Commission considers that it would be helpful for the working group to develop a standard template that could be used for this purpose.

II. Should television and Internet service cancellation requests be excluded from the ILECs' competitor quality of service measurements?

10. In the consensus report, the working group recommended that the ILECs be permitted to exclude television and Internet service cancellation requests from their competitor quality of service measurements, since such requests are not subject to competitor quality of service reporting.
11. Given that the competitor quality of service regime does not apply to television and Internet services, the Commission considers the working group's recommendation to be reasonable. Accordingly, the Commission **approves** the consensus recommendation that television and Internet service cancellation requests be excluded from the ILECs' competitor quality of service measurements.

III. Should the Commission withdraw its determination that wireless services may be cancelled by an agent?

12. In Broadcasting and Telecom Regulatory Policy 2011-191, the Commission determined that wireless service providers must accept wireless service cancellation requests from an agent. In the consensus report, the working group noted that the process for transferring customers between wireless service providers was developed within the Canadian Wireless Telecommunications Association (CWTA) – that is, outside of CISC. The working group also indicated that the implementation costs to update such a process would likely be significant relative to the small number of requests to cancel wireless services through an agent.
13. The working group recommended either withdrawing the Commission's determination or referring the implementation of wireless service cancellations through an agent to the CWTA, which could develop a separate solution if the Commission concluded that there was sufficient demand and business justification for this functionality.

14. In Broadcasting and Telecom Regulatory Policy 2011-191, the Commission considered that the rules in place at that time could result in customer confusion and inconvenience. The intent of the revised rules was to provide consumers with the most choice and convenience in a converged environment, i.e., both broadcasting and telecommunications services. The Commission considered that its approach would simplify customers' experience when switching service providers as their new service provider would be able to handle the changeover.
15. The Commission considers that the proposal to exclude certain wireless services from the transfer process could lead to confusion and inconvenience, and, therefore, is not aligned with the intent of the revised rules. Further, the Commission considers that cancellation through an agent should be available to consumers both when wireless services are provided on a stand-alone basis and when they are provided as part of a bundled service package.
16. Accordingly, the Commission **denies** the working group's recommendation to withdraw the determination requiring service providers to accept wireless service cancellations through an agent.² The Commission directs wireless carriers to develop the process(es) required to accept such requests that will work in conjunction with the working group's proposed solutions and revised processes for other services.

IV. By what date should the changes to the customer transfer process be implemented?

17. The majority of wireline providers indicated that they could implement the working group's recommended changes to the customer transfer process within 12 to 15 months, with only two providers indicating that they would need more time. A number of providers indicated that the actual time required to complete this project is considerably less than the total time estimated to put the changes into effect, but that project and budget scheduling issues would make implementation a lower priority than other activities. The Commission notes that wireless service providers will also have to make changes to their customer transfer process systems to accept service cancellations from customers' new service providers.
18. The Commission notes that all service providers have been aware of process changes required to accommodate cancellation through an agent since the issuance of Broadcasting and Telecom Regulatory Policy 2011-191. The Commission considers that the necessity of a common cutover date for the implementation of enhanced processes that will benefit consumers makes it reasonable to expect a high-priority setting for such changes. Accordingly, the Commission determines that the changes to the customer transfer process, including the changes outlined in the consensus report and the changes to the wireless cancellation process, are to be implemented within 12 months of the date of this decision.

² As noted in Broadcasting and Telecom Regulatory Policy 2011-191, customers will still be responsible for any termination penalties or any other terms that have been agreed to by contract with their current service provider.

19. The Commission notes that, until the agreed-upon changes can be made to the automated customer transfer process and forms, service providers are using temporary measures to accept service cancellation requests from their customers' new service providers. The Commission determines that providers are to continue this practice until the changes in the consensus report are implemented.

Secretary General