



## Telecom and Broadcasting Notice of Consultation CRTC 2025-227

PDF version

Gatineau, 4 September 2025

*Public record: 1011-NOC2025-0227*

### Call for comments – Consumer protections in the event of a service outage or disruption

**Deadline for submission of responses to requests for information (see Appendix 1): 9 October 2025**

**Deadline for submission of interventions: 13 November 2025**

**Deadline for submission of replies: 15 December 2025**

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

[\[Submit your views using the online engagement platform\]](#)

#### Summary

Canadians need access to reliable, affordable, and high-quality communications services for every part of their daily lives.

Telecommunications service outages, even if they are short, are highly disruptive and can seriously impact Canadians' day-to-day lives. All outages can have harmful effects on people, especially when they cannot connect to emergency services in times of need.

The Commission, along with telecommunications service providers (TSPs) and other government authorities, all play a role in preventing and managing telecommunications service outages. This includes federal departments like Innovation, Science and Economic Development Canada and Public Safety Canada, as well as provincial, and territorial emergency management organizations, and 9-1-1 call centres.

In this consultation, the Commission is looking to help make it easier for Canadians to know what to expect from their Internet, cellphone, telephone, or television service providers in the event of a service outage or disruption. It is considering additional consumer protections, including clearer communications from service providers during outages and refunds for lost services.

This is another step the Commission is taking to better protect Canadians through its [Consumer Protections Action Plan](#) and Consumer Protection Codes. The Commission

intends to initiate additional public proceedings to further improve and harmonize the Consumer Protection Codes after it considers the issues raised in this proceeding.

Alongside this consultation, the Commission is taking two additional actions as part of its broader strategy to help lessen the disruptive impact of service outages on Canadians. First, the Commission is helping improve coordination whenever a major outage happens through Telecom Decision 2025-225. The Commission is requiring TSPs to notify it and other government authorities within specific timeframes, as well as file comprehensive post-outage reports. Second, the Commission is gathering views on measures TSPs should take to help improve the resiliency of their networks and the reliability of their services through Telecom Notice of Consultation 2025-226.

A complete list of questions can be found in Appendix 2 to this notice. Information on how to participate in this proceeding or submit views through the [CRTC Conversations](#) online engagement platform can be found [later in this notice](#).

Key information from this notice is available in American Sign Language (ASL) and Langue des signes québécoise (LSQ) on the [Commission's website](#). The Commission will accept video interventions and replies in ASL and LSQ.

## **Introduction**

### **Why we are launching this proceeding**

1. Service outages or disruptions caused by extreme weather, technical failures, or other events can seriously impact Canadians' lives and disrupt their access to telecommunications and broadcasting services. Given the growing importance of networks in the daily lives of Canadians, the Commission is launching this proceeding to consider how it can improve the Deposit and Disconnection Code,<sup>1</sup> the Wireless Code,<sup>2</sup> the Television Service Provider Code,<sup>3</sup> and the Internet Code<sup>4</sup> (together, the Consumer Protection Codes) to:
  - help better respond to Canadians' needs when a service outage happens; and
  - determine whether a refund or credit should be required in the event of a service outage or disruption.
2. This proceeding will help build on the existing consumer protections and focus on how consumer protections in the event of a service outage or disruption can help Canadians be better informed about the status of their services and receive a refund or credit for a service they could not use.

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<sup>1</sup> See Telecom Decision 2011-702.

<sup>2</sup> See Telecom Regulatory Policy 2017-200.

<sup>3</sup> See Broadcasting Regulatory Policy 2016-1.

<sup>4</sup> See Telecom Regulatory Policy 2019-269.

## Legal framework

3. The Commission's decisions must advance the policy objectives set out in section 7 of the *Telecommunications Act*. This proceeding addresses three of those objectives. The Commission aims to:
  - facilitate the orderly development throughout Canada of a telecommunications system that serves to safeguard, enrich and strengthen the social and economic fabric of Canada and its regions (paragraph 7(a));
  - render reliable and affordable telecommunications services of high quality accessible to Canadians in both urban and rural areas in all regions of Canada (paragraph 7(b)); and
  - respond to the economic and social requirements of users of telecommunications services (paragraph 7(h)).
4. In making decisions, the Commission must also implement the [2023 Policy Direction](#).<sup>5</sup> It emphasizes that the Commission should enhance and protect the rights of consumers<sup>6</sup> by, among other things, providing for consumer protection measures in the event of a service outage or disruption.<sup>7</sup>

## Related proceedings

5. Building on the work of Innovation, Science and Economic Development Canada and the Canadian Security Telecommunications Advisory Committee, the Commission announced a multi-stage action plan for a regulatory framework to help improve the resiliency and reliability of telecommunications networks and services.
6. To begin work on the regulatory framework, the Commission launched a public proceeding with Telecom Notice of Consultation 2023-39. In that proceeding, the Commission established service outage notification and reporting requirements for telecommunications service providers (TSPs). The Commission also stated that it may launch proceedings on other issues, such as consumer communication and compensation. In the next stage of that proceeding, the Commission will consider what steps TSPs can take to help improve network resiliency and reliability of telecommunications services by building on recommendations from expert reports and industry best practices.
7. Similarly, in the proceeding launched in Telecom Notice of Consultation 2022-147 and leading to Telecom Regulatory Policy 2025-9, the public record included views from parties about consumer protections for service outages or disruptions in the Far

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<sup>5</sup> *Order Issuing a Direction to the CRTC on a Renewed Approach to Telecommunications Policy*, SOR/2023-23, 10 February 2023.

<sup>6</sup> See paragraph 2(d) of the [2023 Policy Direction](#).

<sup>7</sup> See subparagraph 17(b)(ii) of the [2023 Policy Direction](#).

North. In Telecom Regulatory Policy 2025-9, the Commission imposed protections for service outages or disruptions specifically for residents of the Far North. The Commission also noted its intent to initiate a proceeding—this present proceeding—in which it would consider protections in the event of an outage on a nationwide basis. If the protections that result from this proceeding exceed similar protections outlined in Telecom Regulatory Policy 2025-9 in terms of the benefits offered to consumers, the protections that result from the present proceeding would also apply in the Far North.

8. The Commission wants to help ensure that this proceeding is as inclusive as possible and to minimize the burden on parties. As a result, submissions received from parties in the context of Telecom Notices of Consultation 2022-147 and 2023-39 that are relevant to the issue of consumer protections in the event of service outages or disruptions will be included as part of the public record of this proceeding.
9. Parties that filed such submissions in either of the two proceedings mentioned above are also invited to participate in this proceeding if they wish to file additional submissions in response to this notice.

### **Call for comments**

10. The Commission holds the preliminary view that consumer protections in the event of service outages or disruptions are necessary. To build on the existing consumer protections in place, Canadians may need better protections, including clearer communications or refunds when they experience a service outage with their home Internet, wireless, telephone, or television services.
11. As set out in Appendix 1 to this notice, service providers, including broadcasting distribution undertakings (BDUs), fixed Internet access service providers, local telephone service providers, wireless service providers (WSPs), or industry groups acting on behalf of any of these providers, are requested to submit information on their current policies relating to service outages and disruptions as part of this proceeding. They are also requested to provide information on how those policies are communicated to their customers and how they are applied. This information can be referenced by parties that submit interventions addressing the questions found in Appendix 2 to this notice.
12. Specifically, the Commission is seeking comments on the following issues, as detailed in Appendix 2 to this notice:
  - whether existing protections set out in the Consumer Protection Codes are sufficient to address Canadians' needs in the event of a service outage or disruption;
  - if existing consumer protections are not sufficient to address Canadians' needs, what other measure are necessary, including:
    - the need for Canadians to receive refunds following a service outage;

- the need for Canadians to receive more relevant communications while a service outage is happening; and
- any other measures that may be beneficial to Canadians when a service outage is happening;
- whether persons with disabilities, people residing in rural or remote areas, or other types of customers need additional or different protections in the event of a service outage or disruption;
- how consumer protections for service outages or disruptions, if any, should be applied, including which telecommunications and broadcasting services should be included, whether those protections should apply to individual customers and/or small business customers, and whether those protections, if they apply to wholesale-based service providers, should also apply to wholesale providers;
- how any consumer protections for service outages or disruptions should be administered and enforced, including what the role of the Commission for Complaints for Telecom-television Services Inc. (CCTS)<sup>8</sup> should be;
- how any consumer protections for service outages or disruptions should be implemented and promoted; and
- what approach the Commission should take for the future review of any consumer protections for service outages or disruptions that may be implemented through this proceeding.

13. Following determinations made in this proceeding, the Commission intends to initiate additional public proceedings to improve and harmonize the Consumer Protection Codes. The Commission intends to incorporate any new consumer protections in the event of service outages or disruptions that may be imposed by the Commission through this proceeding into the Consumer Protection Codes at that time.

### **Out-of-scope issues**

14. This proceeding is limited to an examination of the issues outlined in paragraph 12 and detailed in appendices 1 and 2 to this notice. For greater clarity, the following issues are outside the scope of this proceeding, unless directly relevant to the consideration of consumer protections in the event of service outages or disruptions:

- content on the Internet;
- rates and competitiveness of the marketplace;

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<sup>8</sup> The CCTS is an independent organization that handles telephone, cable, and Internet complaints between service providers and their customers. The CCTS is also the administrator of the Consumer Protection Codes.

- reviewing or setting device and equipment standards;
- broadband measurement and advertised speeds;
- broadband funding decisions or mechanisms;
- Internet traffic management practices (ITMPs) and differential pricing (e.g., zero-rating);
- false advertising;
- availability of specific features, services, and/or bundles of services, including programming services;
- privacy obligations of service providers under the *Personal Information Protection and Electronic Documents Act*;
- nature of and solutions to network infrastructure issues;
- participation in the CCTS; and
- other changes to the Consumer Protection Codes that are unrelated to service outages or disruptions.

## **What you need to know to participate in this proceeding**

### **Procedure**

15. The [\*Canadian Radio-television and Telecommunications Commission \[CRTC\] Rules of Practice and Procedure\*](#) (the Rules of Procedure) apply to this proceeding. The Guidelines on the CRTC Rules of Practice and Procedure (Broadcasting and Telecom Information Bulletin 2010-959) are meant to help members of the public understand the Rules of Procedure so that they can more effectively participate in Commission proceedings.

### **Submitting an intervention**

16. The Commission invites comments that address the issues set out above and questions set out in Appendix 2. The Commission will accept comments that it receives on or before **13 November 2025**.

17. Interested persons who require assistance submitting comments can contact the Commission's Hearings & Public Proceedings group at [hearing@crtc.gc.ca](mailto:hearing@crtc.gc.ca).

18. Interested persons who file an intervention automatically become a party to this proceeding. Only parties to the proceeding can participate in further stages of the proceeding.

19. Submissions must be filed by sending them to the Secretary General of the Commission using only one of the following means:
- completing the [intervention form](#);
  - sending a fax to 819-994-0218;
  - writing by mail to CRTC, Gatineau, Quebec K1A 0N2; or
  - submitting an American Sign Language (ASL) or Langue des signes québécoise (LSQ) video using the [intervention form](#).
20. Submissions longer than five pages should include a summary. Submissions will be posted in the official language and format in which they are received.
21. The deadline to submit an intervention to the Commission is 5 p.m. Vancouver time (8 p.m. Gatineau time). Parties are responsible for ensuring the timely delivery of their submissions and will not be notified if their submissions are received after the deadline. Late submissions will not be considered by the Commission and will not be made part of the public record.
22. Submissions relevant to the issue of consumer protections in the event of service outages or disruptions received from parties on the public records of the Telecom Notices of Consultation 2022-147 and 2023-39 proceedings will also be included as part of the public record of this proceeding.

### **Submitting a reply**

23. Parties can file replies with the Commission by **15 December 2025**. Their replies can address any matters on the record of the proceeding.

### **Requests for information**

24. BDUs, fixed Internet access service providers, local telephone service providers, WSPs, and the industry groups representing those providers, including the Canadian Communication Systems Alliance (CCSA), the Canadian Telecom Association (CTA), the Competitive Network Operators of Canada (CNOOC), and the Independent Telecommunications Providers Association (ITPA), are made parties to this proceeding and may file interventions with the Commission by **13 November 2025**.
25. The service providers that have been made parties to this proceeding in paragraph 24, and industry groups representing those providers, are to respond to the requests for information set out in Appendix 1 to this notice by **9 October 2025**. Their responses will be added to the public record of this proceeding.

### **Privacy notice**

26. Please note the following:

- Documents will be posted on the Commission’s website exactly as received. This includes any personal information contained in them, such as full names, email addresses, postal/street addresses, and telephone and fax numbers.
- All personal information parties provide as part of this public process, except information designated as confidential, will be posted on the Commission’s website and can be accessed by others.
- However, the information parties provide can only be accessed from the web page of this particular public process. As a result, a general search of the Commission’s website using either its search engine or a third-party search engine will not provide access to the information that was provided as part of this public process.
- The personal information that parties provide will be used and may be disclosed for the purpose for which the information was obtained or compiled by the Commission or for a use consistent with that purpose.

### **Confidentiality**

27. The Commission’s proceedings are designed to allow members of the public to provide input so that it can make better, more informed decisions. As a result, the general rule is that all information filed with the Commission is placed on the public record and can be reviewed by all parties and members of the public.
28. However, the Commission also often needs detailed information from the companies it regulates and supervises to make an informed decision. This information can be commercially sensitive, especially as the environment in which the companies operate becomes more competitive. The Commission will therefore accept certain information as confidential.
29. Parties can request that information be filed in confidence under subsection 39(1) of the *Telecommunications Act* with a detailed rationale as to why that information should be considered confidential. The Commission reminds parties that make such a request that when a document is filed with confidential information, an abridged version must also be filed so that it can be included in the public record.

### **Accessible formats**

30. The Commission requires regulated entities and encourages all parties to file submissions in accessible formats (for example, text-based file formats that enable text to be enlarged or modified or read by screen readers) for this proceeding. To help in this regard, the Commission has posted [guidelines](#) on its website for preparing documents in accessible formats.
31. If submitted documents have not been filed in accessible formats, you can contact the Commission’s Hearings & Public Proceedings group at [hearing@crtc.gc.ca](mailto:hearing@crtc.gc.ca) to request

that Commission staff obtain those documents in accessible formats from the party that originally submitted the documents in question.

32. The Commission is accepting submissions in ASL or LSQ in video format. The Commission will publish the link(s) to the parties' video(s) on its website. The permissions on the video(s) must be set to public. The Commission will not accept links that require anyone to request access to the video(s). The links on the Commission's website will redirect users to parties' videos as they are uploaded, and users will have access to any of the parties' personal information displayed on the video-hosting platform. The videos will be fully translated into text, and transcripts will be available in English and French for ASL and LSQ videos.

### **Sharing views on CRTC Conversations**

33. People have until **13 November 2025** to share their views on [CRTC Conversations](#), the online engagement platform.
34. The platform facilitates participation among people who may be less familiar with Commission processes. It includes only select questions.
35. All submissions received via [CRTC Conversations](#) will be placed on the public record of this proceeding.
36. Please note the following:
- The information provided is entered into a searchable database on the engagement platform.
  - The comments provided will be attributed to the username given during the registration process on the platform.
  - These comments and usernames are searchable with the help of third-party search engines.
  - Any personal information submitted through the platform will also be searchable. Any information will be used and may be disclosed for the purposes for which the information was obtained or compiled by the Commission, or for a use consistent with that purpose.
37. Participants who provide their views via [CRTC Conversations](#) will not be considered parties to this proceeding. In general, this means that they will not receive notice of other comments or procedural requests or changes, they may not participate in an oral hearing, and they may not be named (or required to participate) in any appeal of the Commission's decision.
38. To become a party, people must submit a formal intervention via the online form, fax, traditional mail, or by ASL or LSQ video. Details on how to submit a formal intervention are provided above.

## Accessing documents

39. Links to interventions, as well as other documents referred to in this notice, are available on the Commission's "[Consultations and hearings: have your say](#)" page.
40. Documents are available upon request during normal business hours by contacting:

Documentation Centre  
[Examinationroom@crtc.gc.ca](mailto:Examinationroom@crtc.gc.ca)  
Tel.: 819-997-4389  
Fax: 819-994-0218

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

41. Interested persons can find electronic versions of the documents by clicking on "[\[Submit an intervention or view related documents\]](#)" at the top of this notice.

Secretary General

## Related documents

- *Call for comments – Development of a regulatory policy on measures to improve the resiliency of telecommunications networks and the reliability of telecommunications services*, Telecom Decision CRTC 2025-226, 4 September 2025
- *Mandatory notification and reporting of major telecommunications service outages*, Telecom Decision CRTC 2025-225, 4 September 2025
- *Telecommunications in the Far North*, Telecom Regulatory Policy CRTC 2025-9, 16 January 2025
- *Call for comments – Development of a regulatory framework to improve network reliability and resiliency – Mandatory notification and reporting about major telecommunications service outages*, Telecom Notice of Consultation CRTC 2023-39, 22 February 2023; as amended by Telecom Notice of Consultation CRTC 2023-39-1, 11 September 2023
- *Call for comments – Telecommunications in the Far North, Phase II*, Telecom Notice of Consultation CRTC 2022-147, 8 June 2022; as amended by Telecom Notices of Consultation CRTC 2022-147-1, 14 July 2022; 2022-147-2, 24 October 2022; 2022-147-3, 13 October 2023; and 2022-147-4, 24 November 2023
- *The Internet Code*, Telecom Regulatory Policy CRTC 2019-269, 31 July 2019; as amended by Telecom Regulatory Policy CRTC 2019-269-1, 9 August 2019
- *Review of the Wireless Code*, Telecom Regulatory Policy CRTC 2017-200, 15 June 2017

- *The Television Service Provider Code*, Broadcasting Regulatory Policy CRTC 2016-1, 7 January 2016
- *CISC non-consensus report – Draft Deposit and Disconnection Code*, Telecom Decision CRTC 2011-702, 14 November 2011
- *Guidelines on the CRTC Rules of Practice and Procedure*, Broadcasting and Telecom Information Bulletin CRTC 2010-959, 23 December 2010

# **Appendix 1 to Telecom and Broadcasting Notice of Consultation CRTC 2025-227**

## **Requests for information from service providers**

All parties that intend to answer the questions set out in Appendix 2 to this notice should be able to do so while referring to factual information regarding existing policies in the event of service outages or disruptions and the current feasibility of detecting them. To ensure this is possible, the service providers that are made parties to this proceeding in paragraph 24 of this notice, including broadcasting distribution undertakings (BDUs), fixed Internet access service providers, local telephone service providers, wireless service providers, and industry groups representing those providers, are to provide the information requested below by **9 October 2025**.

Service providers are to respond separately for each of their brands and/or subsidiaries and, if relevant, for each of their services.

## **Existing policies in the event of service outages or disruptions**

1. For each of the following services, explain your current policies relating to service outages or disruptions for both planned and unplanned service outages or disruption:
  - (a) retail mobile wireless services;
  - (b) retail fixed Internet access services;
  - (c) retail subscription television services provided as a BDU; and
  - (d) retail home telephony services, including voice over Internet Protocol (VoIP) if applicable.
2. Explain how these policies are communicated to customers, including representative sample documents or web pages.

## **Feasibility of consumer protections in the event of service outages or disruptions**

3. For each of the following services, explain the current feasibility of detecting a service outage or disruption for a specific customer without being informed by the customer, addressing whether it depends on the underlying technology through which the customer receives their service:
  - (a) retail mobile wireless services;
  - (b) retail fixed Internet access services;
  - (c) retail subscription television services provided as a BDU; and
  - (d) retail home telephony services, including VoIP if applicable.

4. If, for any service identified in question 3, you identified that it was not currently possible to detect a service outage or disruption for a specific customer and service without being informed by the customer, explain in detail the work required to make it feasible and any related costs you would expect to bear to update your systems.

## **Appendix 2 to Telecom and Broadcasting Notice of Consultation CRTC 2025-227**

### **Questions for all parties**

The Commission is seeking comments from parties on the questions below as part of their interventions, which are to be submitted no later than **13 November 2025**.

Submissions received from parties in the context of Telecom Notices of Consultation 2022-147 and 2023-39 that are relevant to the issue of consumer protections in the event of service outages or disruptions will be included as part of the public record of this proceeding.

Parties that filed such submissions in either of the two proceedings mentioned above are also invited to participate in this proceeding if they wish to file additional submissions in response to this notice.

### **Need to implement consumer protections in the event of a service outage or disruption**

Q1. Should the Commission impose consumer protections in the event of a service outage or disruption, or are existing protections sufficient? Why or why not?

### **Nature and scope of any further consumer protections**

Q2. For any type of consumer protections considered in this proceeding, what should be considered a service “outage” or a “disruption”? For example, how long should the service be out before it is considered a service outage or a disruption?

Q3. Should the definition of these terms vary depending on the service in question (i.e., home Internet, telephone, television, or wireless services)? Why or why not?

Q4. Should service outages and disruptions be treated in the same manner or differently, regardless of the service? Why or why not?

Q5. What type of service outage and disruption protections should be imposed?

- (a) Should the Commission require service providers to issue refunds and/or bill credits (hereafter, refunds)? Why or why not?
- (b) Should the Commission require service providers to send out customer communications regarding service outages or disruptions? Why or why not?
- (c) What other measures, if any, should service providers undertake in responding to customers before, during, or after a service outage?

Q6. What exceptions should be considered? Possible exceptions could include, for example, customer-caused service outages or disruption, service outages or disruption caused by third parties not employed by the service provider, or unforeseen force majeure events.

Q7. Should the Commission establish a minimum duration to a service outage or disruption before any potential consumer protections are required? Address each proposed protection measure, including mandatory refunds and customer communication requirements.

### **Application of any consumer protections**

Q8. Should any new requirements apply to all telecommunications service providers and broadcasting distribution undertakings (BDUs)? Why or why not?

Q9. More specifically, which retail services warrant the imposition of consumer protections in the event of a service outage or disruption? For example, should the measures apply to all services that are in a typical bundle and covered by the existing Consumer Protection Codes<sup>9</sup> (i.e., home Internet, telephone, television, and wireless services)?

Q10. Should any new requirements apply to retail services that are still subject to a tariff? Comment on which tariff amendments would be necessary, and provide an explanation and rationale.

Q11. Should the application of any new consumer protections in the event of a service outage or disruption be limited to service providers that are currently required to comply with the Consumer Protection Codes? Or should they be extended to all service providers offering services considered in question 9 of this appendix, including those that are not currently subject to the Internet Code and Deposit and Disconnection Code? Why or why not?

Q12. Should any new consumer protections apply to voice over Internet Protocol (VoIP) providers? Why or why not?

Q13. Who should benefit from any consumer protections considered in this proceeding?

- (a) Should any new requirements apply to residential customers only or to small business customers as well? Why or why not?

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<sup>9</sup> The existing Consumer Protection Codes include the Deposit and Disconnection Code (see *CISC non-consensus report – Draft Deposit and Disconnection Code*, Telecom Decision CRTC 2011-702, 14 November 2011); the Wireless Code (see *The Wireless Code*, Telecom Regulatory Policy CRTC 2013-271, 3 June 2013, and *Review of the Wireless Code*, Telecom Regulatory Policy CRTC 2017-200, 15 June 2017); the Television Service Provider Code (see *The Television Service Provider Code*, Broadcasting Regulatory Policy CRTC 2016-1, 7 January 2016); and the Internet Code (see *The Internet Code*, Telecom Regulatory Policy CRTC 2019-269, 31 July 2019, as amended by *The Internet Code*, Telecom Regulatory Policy CRTC 2019-269-1, 9 August 2019).

- (b) If they should apply to businesses as well, should their application be limited to small business<sup>10</sup> customers as generally defined in the context of the Consumer Protection Codes and by the Commission for Complaints of Telecommunication Services (CCTS)? Why or why not?

**Possible refund requirement**

Q14. If a refund requirement is imposed:

- (a) Should the Commission set out how refunds to customers are to be calculated and if so, on what basis? For example, the Commission's *Prohibition of 30-day cancellation policies*<sup>11</sup> provides for refunds for unused services following cancellation, pro-rated on a daily basis.
- (b) Should the Commission determine the format of the refunds (for instance, as bill credits, direct payment, or through other means)? Why or why not?
- (c) Should the amount of the refund be limited to the cost of the service that suffered a service outage or disruption? Why or why not?
- (d) Should other factors also be considered, including setting a minimum per service outage or disruption, considering additional compensation in recognition of the impact of a service outage, or a specific process to compensate for potential loss of time or revenues? Why or why not?
- (e) How should bundled services be addressed for the purposes of a refund?
- (f) Should refunds be automatically awarded where the service provider detects a service outage or a disruption? Should customers be required to inform their service providers that they were subject to a service outage or disruption before receiving a refund? Or should both approaches be implemented in parallel? Why or why not?
- (g) How should refunds be assessed for services billed on a different basis? For example, how should refunds be assessed in the case of prepaid or pay-as-you-go services or in the case of services that are purchased as an add-on?
- (h) Should refunds be issued within a prescribed deadline? Why or why not?

Q15. Address the feasibility of service providers detecting and measuring service outages and disruptions for the purpose of assessing refunds. Explain your position.

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<sup>10</sup> A small business is defined as one whose average monthly telecommunications bill is under \$2,500.

<sup>11</sup> See *Prohibition of 30-day cancellation policies*, Broadcasting and Telecom Regulatory Policy CRTC 2014-576, 6 November 2014 (as clarified in *Quebecor Media Inc. – Prohibition of 30-day cancellation policies - Application regarding pro-rated refunds for cancelled services*, Telecom Decision CRTC 2016-171, 5 May 2016).

**Possible customer communication requirement**

Q16. If a customer communication requirement is imposed:

- (a) Should the customer communication requirement be required in the event of planned service outages or disruptions, unplanned service outages or disruptions, or both? Why or why not?
- (b) Should the customer communication requirement differ in nature or content depending on whether the service outage or disruption is planned or not? Why or why not?
- (c) Should the Commission determine the means and time frame for communications regarding service outages and disruptions with customers? Why or why not?
- (d) What information should be required to be included in these communications?
- (e) What should the means of communications be and why? Possible options include mailing lists, social media, announcements on the provider's website, up-to-date service outage maps, etc.
- (f) Should the communications be sent to account holders only or to account users as well to ensure that anyone using the service is kept informed of service outages or disruptions? Why or why not?

**Additional or different protections for persons with disabilities, people residing in rural or remote areas, and other types of customers**

Q17. In the context of the protections considered above, is the experience of persons with disabilities with service outages or disruptions different from the experience of other customers? If so, should the Commission consider additional or different protections for these customers? Explain your rationale.

Q18. In the context of the protections considered above, is the experience of people residing in rural or remote areas with service outages or disruptions different from the experience of other customers? If so, should the Commission consider additional or different protections for these customers? Explain your rationale.

Q19. In the context of the protections considered above, is the experience of any other types of customers different? If so, should the Commission consider additional or different protections for these customers? Explain your rationale.

**Wholesale implications**

Q20. Should any new service outage and disruption protection measures apply to wholesale-based service providers regarding their retail customers? Why or why not?

Q21. What are the implications if the cause of the service outage or disruption is not the wholesale-based service provider?

Q22. Should wholesale providers have requirements to have a service outage and disruption policy regarding their wholesale customers through their tariffs or contractual provisions or imposed by the Commission? Why or why not?

### **Administration and enforcement**

Q23. As the independent organization that handles telephone, cable, and Internet complaints between service providers and their customers and administrator of the Consumer Protection Codes, should the CCTS administer any new consumer protections in the event of a service outage or disruption that may be imposed? Why or why not?

Q24. Should the CCTS be required to report specific information? Why or why not?

Q25. Should the Commission be responsible for enforcing compliance with any new requirements? If so, how?

Q26. Should service providers be required to report periodically on their compliance? If so, what information should service providers be required to provide for compliance assessment purposes and when?

### **Implementation and promotion**

Q27. How should any new consumer protections considered in this proceeding be implemented? For example, in the case of telecommunications service providers, should they be imposed as a condition of service for telecommunications services under sections 24 and 24.1 of the *Telecommunications Act*? In the case of BDUs, should they be imposed as a condition of service under paragraph 9.1(1)(j) of the *Broadcasting Act*?

Q28. When should any new consumer protections for service outages or disruptions be implemented? Could they be implemented within three months of the publication of a Commission decision?

Q29. Comment on whether, if a service provider faces unique barriers that would make implementing a specific provision virtually technically impossible or financially unreasonable for itself, it should be able to submit a Part 1 application prior to the provisions coming into effect, seeking an extension to the implementation of those provisions.

Q30. What promotion mechanisms would be appropriate to effectively promote any new service outage and disruption protections that may be imposed? Which entities should be responsible for the promotion of any new service outage and disruption protections?

### **Review**

Q31. How and when should the effectiveness of any consumer protections in the event of a service outage or disruption be reviewed? Provide justification for your position.