Canadian Radio-television and Telecommunications Commission
Conseil de la radiodiffusion et des télécommunications canadiennes

Canada

FORUM RESEARCH INC.

CRTC Sales Practices Review – 2020 Secret Shopper Project Detailed Findings Report

Prepared for: **Canadian Radio-television and Telecommunications Commission**
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Marketing Research and Intelligence Association
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3 April 2020

Cat. No. BC92-109/2020E-PDF

ISBN 978-0-660-35699-0

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Executive Summary

The results of the Secret Shopper Project indicated that the majority of the sales interactions were perceived to be positive, although some shortcomings were also identified.

The overall satisfaction rates across key metrics (i.e. appropriate products or services recommendation, misleading sales practices, pressuring consumers to sign up, offering unwanted services, etc.) were approximately 80%. However, this means that 1 in 5 potential consumers perceived that they may have faced misleading or aggressive sales practices, which is still a significant number.

This is consistent with the findings of the representative online panel portion of the Ipsos Report that was conducted as part of the proceeding that resulted in the *Report on Misleading or Aggressive Communications Retail Sales Practices*:

> "Overall, four in ten (40%) Canadians who responded to the online panel survey report having experienced sales practices by telecommunications companies in Canada that they consider to be aggressive or misleading, **the majority of which report their most recent experience took place within the past year (60% of those who experienced these tactics or 24% of all Canadians**)." (emphasis added)

Offering Plans at Different Price Points

One issue that shoppers consistently encountered was that in terms of post-paid plans with data. The big three Service Providers – Bell, Rogers and Telus – do not appear to be offering any flexibility in terms of choices. In terms of the lowest-priced, postpaid plans, they are only offering a $75/month price point plan, excluding a mobile device. This offering included 10 GB of data, with no overage fees, but rather managed connectivity over 10 GB – what is being marketed as unlimited plans. This is the lowest priced plan offered by these Service Providers to the secret shoppers, even those who are looking for a lower-priced plan, or who don't use as much data and it would appear that their needs are not being accommodated.

In comparison, the lowest-priced plan that offers the same data allowance at Freedom is $50/month. Sasktel and Videotron do offer more variety in terms of data allowances and pricing.

Accessibility

One concerning observation from the Secret Shopper Project is that shoppers with disabilities are facing significant barriers in accessing the appropriate telecommunications products or services that accommodate their accessibility needs. This will be covered in more detail in a later section titled 'Accessibility' in this report, but to summarize a few key findings:

- Consumers with disabilities typically have significantly lower satisfaction rates across key metrics on sales practices, such as appropriate products or service recommendations, misleading sales practices and aggressive sales practices, compared to consumers without disabilities.
- Certain aspects of the sales process, such as the Online Chat icon/button on the Service Providers' websites, may not be accessible to all Canadians who are blind or partially sighted, who rely on assistive devices and software (i.e. screen readers) that allow them to browse websites. In addition, consumers who are blind or partially sighted appear not to be offered

their contracts in alternative formats, but the sample, in both instances, was not large enough to say definitively if this is a systematic issue and further investigation may be warranted.

- Certain companies, like Rogers and Bell, advertise their ability to accommodate deaf shoppers with sign language interpreters during the sales interaction (i.e. either to reimburse the costs for the sign language interpreter or arrange for a sign language interpreter). In reality, however, the process appears to have proven to be prohibitively difficult for the secret shopper who tried to access this accommodation, but again, the sample was not large enough to say definitively if this is a systematic issue and further investigation may be warranted.

People with Language Barriers

Overall, consumers with language barriers are also dissatisfied on certain metrics, although on a smaller number of metrics, compared to the higher-than-average dissatisfaction rates of people with disabilities almost across the board. On some metrics, there aren't significant differences between people with a language barrier compared to people without a language barrier. For example, on whether the recommended product was appropriate for their needs, 73% of people with a language barrier were satisfied, compared to 74% satisfaction rate for people without a language barrier.

Some notable sources of significant dissatisfaction are:

- 36% of shoppers with language barriers felt that the salesperson did not make an attempt to accommodate the language barrier.
- Whether the information provided during the sales interaction was clear and simple, 82% of shoppers with language barriers were satisfied, compared to 89% satisfaction rate from people without a language barrier.
- On whether they were given sufficient time to make an informed decision, 78% of shoppers with language barriers were satisfied, compared to 88% of shoppers without a language barrier.
- On whether the salesperson downplayed any concerns expressed by the shopper, 40% of shoppers with language barriers were dissatisfied on this metric, compared to an 18% dissatisfaction rate from shoppers without a language barrier.

Seniors

One of the interesting findings of this Secret Shopper Project was that shoppers who are seniors have higher satisfaction rates than non-seniors almost across the board, and even significantly higher on certain metrics. For example, on whether the salesperson explained the relevant consumer protections, 100% of senior shoppers were satisfied, compared to 79% of non-seniors.

Overall, senior shoppers felt they were recommended the appropriate product (79%), given clear and simple information (94%), given sufficient time to make an informed decision (91%), not being misled (93%) or felt pressured to purchase (9%), compared to non-senior shoppers (at 73%, 87%, 87%, 92%, and 12%, respectively).

Further exploration on why this trend is taking place is perhaps warranted, and may provide insights to help enhance the accommodation for other demographics who may be more vulnerable to misleading or aggressive sales practices, such as people with disabilities and language barriers.

Sales Channels

It is worth noting that satisfaction rates on sales interactions through online chats are significantly lower compared to sales interactions through in-person visits or over the phone.

In addition, most companies’ online chat functionalities are very limited. Many shoppers reported that if they inquired about anything other than a post-paid plan, for example if they inquired about prepaid plans or accessibility related products or services, they would be asked to call or visit a store in person.

Moreover, many shoppers who are blind or partially sighted who use assistive devices and software that allows them to read text on websites, reported that websites’ online chat icon/button are not accessible and do not allow their assistive devices to detect the online chat icon/button.

Background and Research Objectives

Project Background

From June 2018 to February 2019, the Canadian Radio-television and Telecommunications Commission (CRTC) conducted a public process in response to Order in Council P.C. 2018-0685 (the Order in Council), in which the Governor in Council directed the CRTC to make a report on the use of misleading or aggressive retail sales practices by Canada's large communications service providers which culminated in the publication of a report on these findings, the CRTC's *Report on Misleading or Aggressive Communications Retail Sales Practices* (the CRTC Report), on 20 February 2019. As part of that process, the CRTC hired Ipsos Public Affairs to produce a report, based on multiple public opinion research methods, that is representative of views from across Canada. The resulting report, entitled *Consultation on Canada's large telecommunications carriers' sales practices* (the Ipsos Report) was included in the record of that proceeding.

In their report, the CRTC found that it is apparent that misleading or aggressive retail sales practices are present in the communications service provider market in Canada and, to some extent, in the television service provider market.

These practices exist in all types of sales channels, including in store, online, over the telephone, and door to door. The CRTC reported that those practices occur to an unacceptable degree; they are harming Canadian consumers, in particular Canadians who may be more vulnerable to these practices, such as seniors, Canadians with disabilities and Canadians whose mother tongue is neither English nor French; and they are a serious concern for the CRTC.

The report identified many effective ways to strengthen existing consumer protections to prevent Canadians from being subject to misleading or aggressive retail sales practices, including monitoring the sales practices through research initiatives such as an ongoing nationwide secret shopper program overseen by the CRTC, the results of which would be published.

The CRTC launched a process in the spring of 2019 to commission a company to conduct a Secret Shopper Program (the Secret Shopper Project).

Research Objectives

The CRTC's primary research objective is to gain a better understanding of how front-line employees of the communications service providers (the Service Providers) sell communications services and how consumers experience the sales process to assist the CRTC in its decision-making processes regarding misleading or aggressive sales practices.

For the purposes of the Secret Shopper Project, the CRTC focused on the sale of wireless mobile services.

The result of this Secret Shopper Project answers the following questions:

- How are wireless mobile services sold?
- Is communication (verbal, written, and/or electronic) during the sales process perceived as clear, simple, and not misleading from the perspective of secret shoppers?

- Are there observable similarities and differences in how wireless mobile services are sold to consumers with a diverse range of demographic backgrounds, including consumers who may be more vulnerable due to their age, a disability, or a language barrier?

To achieve this research objective, realistic secret shopper scenarios were used to replicate the consumer experience and create a believable interaction between Service Providers' employees and secret shoppers posing as new and existing Service Providers' customers whether it be in store, on the phone, or through Service Providers' online chat functions.

Research Design and Key Dates

This Secret Shopper Project was divided into two phases. The first phase was an initial Test Pilot Project in 2019 with the purpose of testing the methodology and research design, in preparation for the full launch of the Secret Shopper Project in early 2020.

Pilot project

Test Pilot Project

The Test Pilot Project consisted of 18 shops in total, and took place across the country in order to be as geographically representative as possible. The fieldwork of the Test Pilot Project took place between 6 December 2019 to 13 December 2019. The sampling plan for the Test Pilot Project followed similar themes as the sampling plan of the Secret Shopper Project, although given the small sample size, the percentages were not accurate, but made as closely to the targets as possible.

Quotas and Sampling Plan

To ensure that the Secret Shopper Project was as representative of Canadians' experience as possible, the sampling plan ensured the mystery shops were organized taking into account several considerations:

- **Service Providers**: this Secret Shopper Project targeted the main brands of the six of the largest Service Providers of telecommunication services or products in Canada, namely: Bell, Rogers, Telus, Sasktel, Freedom and Videotron. The number of shops per the Service Providers were divided according to each Service Provider's portion of the total market share.

Service Provider	Percentage	Actual
Bell	29%	121
Rogers	32%	133
Telus	29%	124
Sasktel	2%	8
Freedom	5%	20
Videotron	4%	16
Total	**100%**	**422**

- **Sales channels:** this Secret Shopper Project focused on the three sales channels: in-store, online and phone. In-store shops take up approximately half of the total number of mystery shops, while online and phone shops take up approximately a quarter each.

Sales Channel	Bell	Freedom	Rogers	Sasktel	Telus	Videotron	Total	Percentage
In-Store	64	11	70	4	65	8	**222**	**53%**
Online	28	5	32	2	29	4	**100**	**23%**
Phone	29	4	31	2	30	4	**100**	**23%**
Total	**121**	**20**	**133**	**8**	**124**	**16**	**422**	**100%**

- **Region:** for this Secret Shopper Project, the mystery shops were also divided up by the Canadian provinces according to their proportion to the overall Canadian population. The breakdown is as follows:

Region	Percentage	Actual
Atlantic	7%	30
Quebec	23%	97
Ontario	39%	162
Prairies	19%	78
British Colombia	13%	55
Total	**100%**	**422**

- **Language:** the mystery shops were divided between English and French-speaking shops by each language's proportion of the Canadian population. During this Secret Shopper Project, all French-speaking shops were done in Quebec, while all English shops were done in provinces other than Quebec.

Language	Percentage	Actual
English	77%	325
French	23%	97
Total	**100%**	**422**

- **Gender:** The mystery shops were divided with an aim to ensuring gender parity.

Gender	Percentage	Actual
Male	50%	212
Female	50%	210
Total	**100%**	**422**

- **Populations who may be more vulnerable:** One of the key focus points of this Secret Shopper Project is whether Canadians who may be more vulnerable to misleading or aggressive sales practices are being accommodated and this Secret Shopper Project focused on the following demographic factors:

- People with a disability (those that are deaf, deaf-blind, and hard of hearing (DDBHH), and blind or partially sighted);
- People with language barriers; and,
- Seniors (people who are 65 years or older).

To ensure that these populations were properly represented, special efforts were made to recruit secret shoppers that could report on their experiences. For example, accessibility groups across Canada were contacted to recruit shoppers across Canada that could provide their insights. Further, efforts were made to recruit shoppers whose mother tongue is neither English nor French, but is a representative third language in their locality based on Statistics Canada data, to assess a situation that is more likely to happen in those stores, such as Cantonese-speaking shoppers in Richmond, British Columbia. To that end, many English and French as a Second Language (ESL or FSL) schools across Canada were contacted with the goal of recruiting shoppers whose mother tongue is neither English nor French.

The breakdown of shoppers representing populations who may be more vulnerable to misleading or aggressive sales practices is as follows:

Population Group	Percentage	Actual	Male	Female
Blind/Partially Sighted	8%	33	24	9
Deaf/Hard of Hearing	4%	16	12	4
Deaf-blind	6%	26	17	9
Language barrier	10%	44	22	23
Seniors	13%	53	34	19
Total	**41%**	**172**	**109**	**64**

Questionnaire

A questionnaire of 41 questions was developed and was divided into sections that focused on six key aspects of the sales process:

- Shop Scenario (9 questions),
- Demographics (5 questions),
- Sales Interaction (14 questions),
- Contract Delivery (8 questions),
- Accessibility Accommodation (14 questions), and
- Cancellation (2 questions).

The questionnaire was completed by the mystery shopper after their sales interaction, and would take 10 to 20 minutes to complete. The questionnaire in both English and French can be found in Appendix A of this report.

Recommended Appropriate Products or Services

74% of shoppers across the country indicated that they were recommended a product or service that was appropriate for their needs, meaning more than a quarter (26%) of shoppers were not recommended appropriate products or services.

Among the Service Providers, Bell had the highest satisfaction score on this metric with 80%, while Rogers had the lowest score with 68% satisfaction rate.

Accessibility

People with disabilities were significantly less likely to be recommended a product or service that was appropriate for their needs compared to people who do not have a disability, with 65% and 76%, respectively. Among shoppers with disabilities, people who are deaf or hard of hearing had above average satisfaction rate at 88%, while shoppers who are blind or partially sighted had much lower satisfaction rate at 64%, and shoppers who are deaf-blind had the lowest satisfaction rate at 50%.

Language Barrier

Satisfaction rate of shoppers with language barriers did not have significant differences compared to shoppers without a language barrier, with 73% and 74%, respectively.

Seniors

Seniors were more likely to feel that they received appropriate recommendations compared to younger shoppers, with 79% and 73%, respectively. Upon further investigation into the open-ended responses to the questionnaire by senior shoppers, it appears that although the general population is mainly offered the $75/month, 10 GB plan, seniors are being offered a much higher variety of plans compared to non-seniors. Approximately 12% of seniors were offered the $75 plan, compared to 25% of non-seniors being offered the same plan.

Region

Among the provinces, the Atlantic provinces had the highest satisfaction rate with 93%, while Quebec had the lowest

Qualitative Insights

The Secret Shopper Project involved several shoppers who are blind or partially sighted to conduct online shops.

These shoppers typically browse websites using assistive devices/software, one of the most commonly used software is JAWS, which is short for Job Access with Speech.

Unfortunately, one shopper who is legally blind reported that his software was unable to locate the Online Chat Icon/Button on several Service Providers' websites. It is worth noting that other shoppers who are blind or partially sighted did not report that they could not locate this function. This could mean that although many Service Providers have provided accessibility-related features on their websites, these features do not appear to accommodate all Canadians who are blind or partially sighted.

Below are his comments

"I was not able to locate the live chat feature on the websites. I tried using different browsers, including the most recent versions of Google Chrome and Internet Explorer, through my JAWS for Windows 2020 software. I also tried using shortcuts available on JAWS to try to locate any buttons or links for the Live Chat feature. I tried aligning my JAWS cursor with my PC cursor to see if that would help. It was impossible for me to find the live chat feature using all tools available to me."

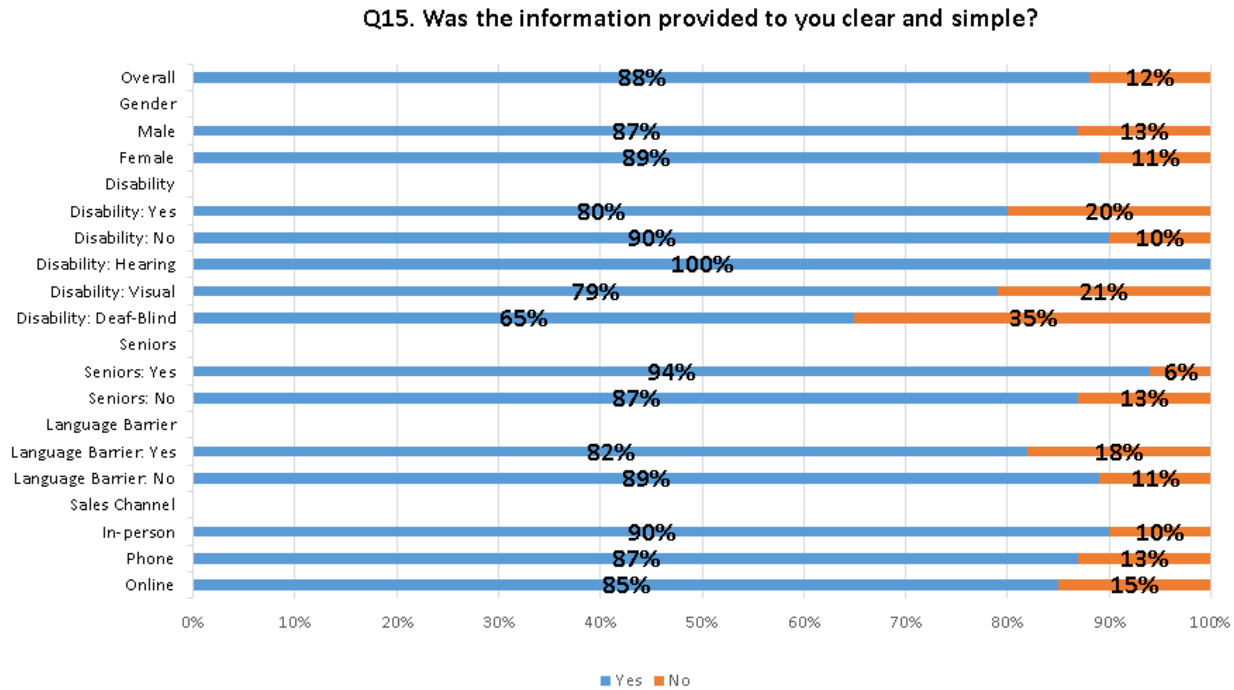
satisfaction rate with 69%, and the satisfaction rates for British Columbia, Ontario and the Prairies were 76%, 72%, and 74%, respectively.

Sales Channels

Among the three sales channels (in-person, phone, and online), online sales channels were the least likely to give appropriate product or service recommendations at 61%, compared to 80% for in-person, and 74% for phone.

Misleading Sales Practices/Clear and Simple Information

92% of shoppers found that the information they were provided was not misleading, and 88% of shoppers indicated that the information they were provided was clear and simple to understand.



Service Providers

On whether the information provided was clear and simple to understand, the satisfaction rate is consistent across all Service Providers (in the 88%-89% range) except Freedom, which received a 75% satisfaction rate. In terms of being provided misleading information, Freedom and Videotron had the highest rates of dissatisfaction with 15% and 13%, respectively. Bell, Rogers, Sasktel, and Telus had 7%, 7%, 0%, and 9% respectively.

Language

On whether the information provided was misleading, French shoppers were more likely to be satisfied compared to English shoppers, with 97% and 91%, respectively. Videotron, the Service Provider that operates mainly in Quebec, had a satisfaction rate of 87% on this metric.

Accessibility

People with disabilities were significantly less likely to find the information provided as clear and simple compared to people who don't have disabilities, with 80% and 90%, respectively. They were also much more likely to find the information provided was misleading, with 18% compared to 6% for those without disabilities. Among those with disabilities, 100% of those who were deaf or hard of hearing said that the information provided was clear and simple, compared to 79% for those who are blind or partially sighted, and 65% for those who are deaf-blind.

Language Barrier

82% of people with language barriers found the information provided as clear and simple, compared to 89% for those without a language barrier. 11% of those with language barriers found the information provided to be misleading, compared to 8% for those without a language barrier.

Seniors

Seniors were significantly more likely to feel that the information provided during the sales interaction was clear and simple compared to non-senior shoppers, with 94% and 87%, respectively.

Seniors were also less likely to feel that the information provided was misleading compared to non-seniors, though not to a significant degree, both at 8%.

Region

On whether the information provided was misleading, shoppers in British Columbia were significantly more likely to be dissatisfied with this metric compared to other provinces with 15%, compared to 3% for Atlantic, 9% for Ontario, 8% for Prairies, and 4% for Quebec. It is worth noting that the Government of British Columbia had undertaken a survey of their constituents in Spring-Summer 2019 to identify ways to enhance cellphone contract and billing transparency, reaching over 15,000 residents.[1] It is possible that the communications efforts made by the Government of British Columbia about that report made those concerns more top of mind for residents.

Sales Channels

Among the three sales channels, in-person shops were more likely to provide information that was clear and simple at 90%, compared to 87% for phone, and 85% for online.

Qualitative Insights

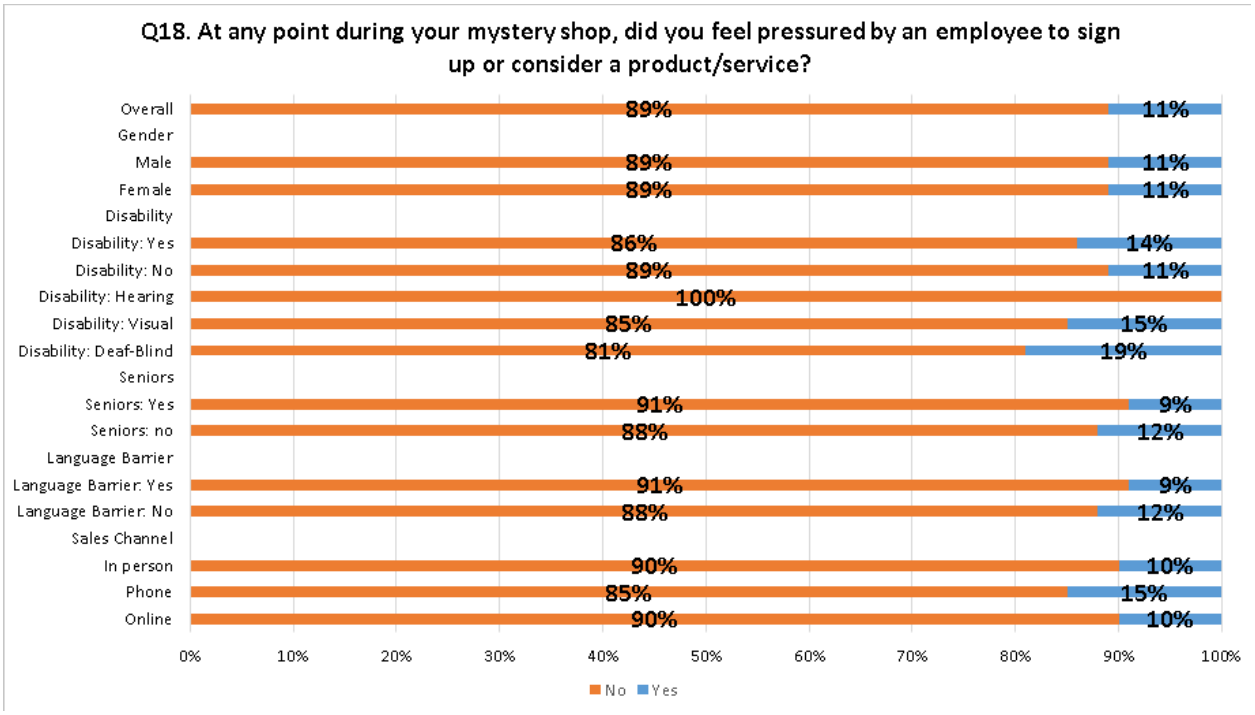
Many shoppers who either had language barriers, inquired about prepaid plans, or had existing postpaid plans and were looking to subscribe to a lower tier plan, reported that they received rude remarks/attitudes by the Service Providers' staff, were refused service, or were told to go to another company. This last one is not necessarily an issue depending on whether it was dismissive or was aimed at ensuring the customer was directed to a Service Provider better positioned to provide the service to the customer.

During the planning phase of the Secret Shopper Project, it was not anticipated that shoppers would face rude remarks, and/or being refused service. Thus this scenario was not being quantified. This could be explicitly added to future iterations of the CRTC Secret Shopper Program.

[1] Information about this undertaking by the Government of British Columbia can be found here: https://engage.gov.bc.ca/cellphonebilling/

Shoppers felt pressured to sign up/not given enough time for make an informed decision

About 13% of shoppers felt that they were not given sufficient time to make an informed decision, and overall 11% felt they were pressured by an employee to sign up or consider a product or service.



Accessibility

Among people with disabilities, shoppers who are deaf or hard of hearing had the highest rate of satisfaction on whether they were given sufficient time during a sales interaction at 100%, compared 76% for people who are blind or partially sighted, and 85% for those who are deaf-blind. On whether shoppers felt they were pressured to sign up for a product or service, shoppers who are deaf or hard of hearing shoppers had a 100% satisfaction rate, compared to 85% for those who are blind or partially sighted, and 81% for those who are deaf-blind.

Language Barrier

People with language barriers were significantly less likely to feel that they were given sufficient time to make an informed decision compared to people without a language barrier, at 78% and 88%, respectively. This means that, in reverse, their dissatisfaction rate on this metric is almost double when compared to those shoppers without language barriers (22% and 12%, respectively).

However, 9% of shoppers with language barriers felt they were pressured by an employee to sign up for a product or service, compared to 12% for shoppers without a language barrier.

Seniors

Among seniors, 91% of shoppers felt that they were given sufficient time to make an informed decision, compared to 87% of non-senior shoppers. 9% of shoppers who are seniors felt they were pressured by an employee to sign up for a product or service, compared to 12% of shoppers who are not seniors.

Service Providers

Among the Service Providers, Bell had the highest rate of dissatisfaction of 17% on whether shoppers felt they were given sufficient time during the sales interaction, followed by 14% for Rogers, 13% for Sasktel, 10% for Freedom, 9% for Telus, and 6% for Videotron.

Similarly, in terms of the shoppers feeling pressured to sign up or consider a service or product, Bell had the highest rate of dissatisfaction at 17%, followed by Videotron with 13%, Rogers with 12%, Telus with 7%, Freedom with 5%, and Sasktel with 0%.

Region

On whether shoppers felt they were not given sufficient time during a sales interaction, Ontario had the lowest satisfaction rate among the provinces with 82%, compared to 100% for Atlantic, 89% for British Columbia, 92% for Prairies, and 87% for Quebec. In terms of misleading sales practices, Ontario similarly had the lowest satisfaction rate with 85%, compared to 100% for Atlantic, 89% for British Columbia, 90% for Prairies, and 90% for Quebec.

Qualitative Insights

With respect to the big three Service Providers, consumers who are not existing customers with the Service Provider are told that the lowest-priced postpaid plan is a $75/month, unlimited data plan.

However, some shoppers were told that if they were an existing customer with the Service Provider, they could be offered a lower-priced plan.

They were not offered an explanation on this inconsistency.

Sales Channels

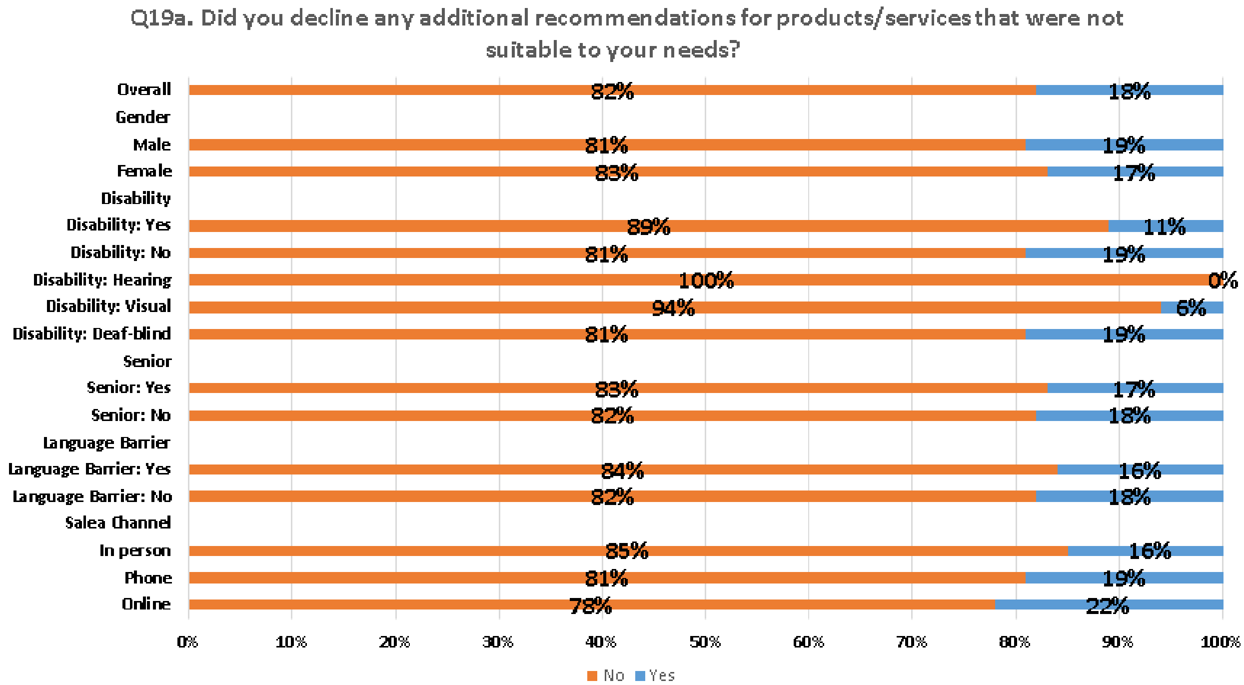
Similar to other metrics, shoppers were significantly more likely to be satisfied with this metric through an in-person interaction compared to phone and online, with 90%, 87% and 81%, respectively.

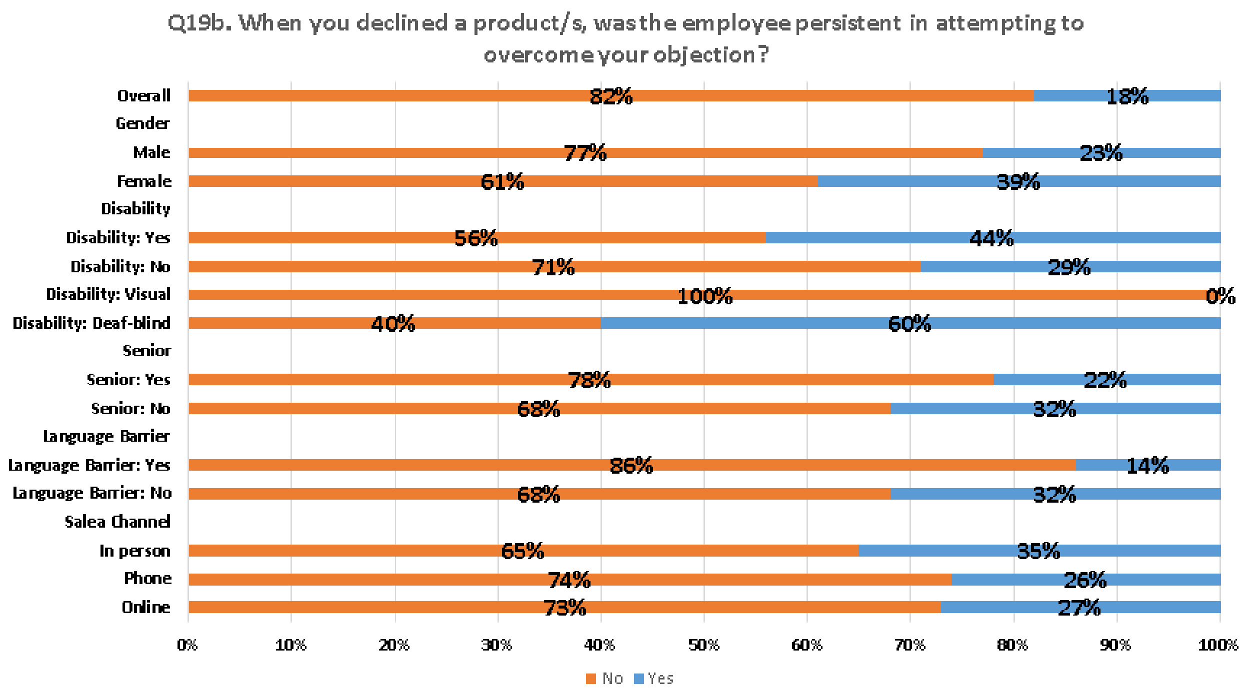
Salesperson's Persistence in Overcoming Shopper's Objection

In addition to the product or service they originally inquired about, 18% of shoppers indicated that they declined additional products or services which were offered by the salesperson.[2] Among those who declined an additional product or service recommendation, 31% of shoppers found the salesperson to be persistent in overcoming their objection. This amounts to approximately 6% of shoppers who have

[2] During the Secret Shopper Project, each shopper was assigned a specific scenario for their shop (i.e. post-paid plan looking to downgrade, prepaid plan, plan that accommodates accessibility needs, etc.) It is assumed that all shoppers who are offered additional services or products during their sales interaction rejected their offers.

both declined offers on unnecessary products or services and perceived persistence in overcoming their objections by the salesperson.





Gender

Among shoppers who declined an additional product or service recommendation, female shoppers (39%) were significantly more likely to face persistent efforts from the salesperson to overcome their objection compared to male shoppers (23%).

Accessibility

Shoppers without a disability were significantly more likely to decline an additional product or service that was not appropriate to their needs compared to shoppers who have a disability, 19% and 11% respectively. Among shoppers with disabilities, however, those who are deaf-blind (19%) were significantly more likely to decline an inappropriate recommendation on a product or service compared to shoppers who are deaf or hard of hearing (0%) or blind or partially sighted shoppers (6%).

Among shoppers who declined offers on additional product or service that was not appropriate to their needs, shoppers with disabilities were significantly more likely to face persistence by the salesperson to overcome their objection compared to shoppers without a disability, with 44% and 29% respectively.

Language Barrier

16% of shoppers with a language barrier declined additional offers on products or services that were not suitable to their needs, compared to 18% of shoppers without a language barrier.

Seniors

17% of senior shoppers declined additional products or services during their sales interactions, compared to 18% of non-senior shoppers. Among those who declined additional products or services, senior shoppers were significantly less likely to face employee's persistence in overcoming their objection compared to non-senior shoppers, at 22% and 32%, respectively.

Sales Channels

Online interactions (22%) had significantly higher rate of shoppers declining additional offers of products or services, compared to in-person (16%) and phone interactions (19%).

Among the three sales channels, salespeople were significantly more likely to be persistent in overcoming a shopper's objection to a recommended product or service in person (35%), than during a phone (26%) or online interaction (27%).

Service Providers

Among the Service Providers, Telus and Bell had the highest rate of shoppers declining additional offers on products or services, at 22% and 19%, respectively, followed by 15% for Freedom, 15% for Rogers, 13% for Sasktel, and 6% for Videotron. Of those, shoppers reported persistent attempts to overcome their objection by salespeople of 35% for Bell, 33% for Telus, 30% for Rogers, and 0% for Freedom, Sasktel and Videotron. However, the sample size for Freedom, Sasktel and Videotron are not statistically significant enough to draw meaningful conclusions.

Language

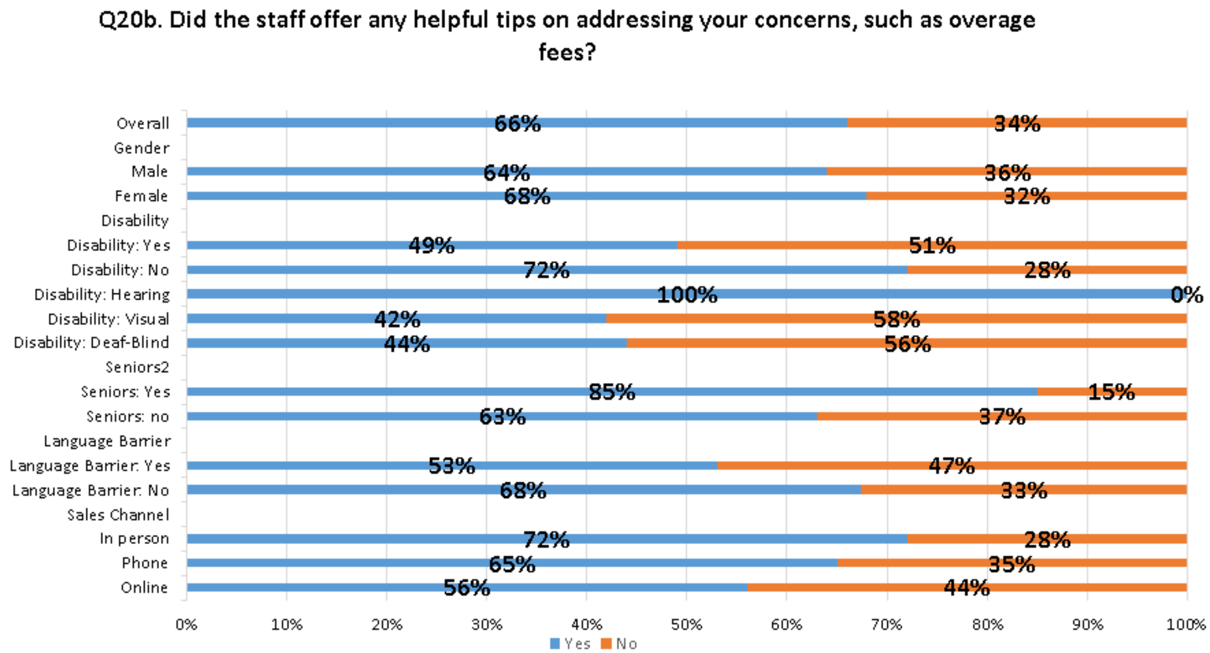
English-speaking shoppers were significantly more likely to decline additional offers on products or services at 84%, compared to 73% for French-speaking shoppers. There was no significant difference in terms of facing employee persistence in overcoming their objection among English and French shoppers, both at 31%.

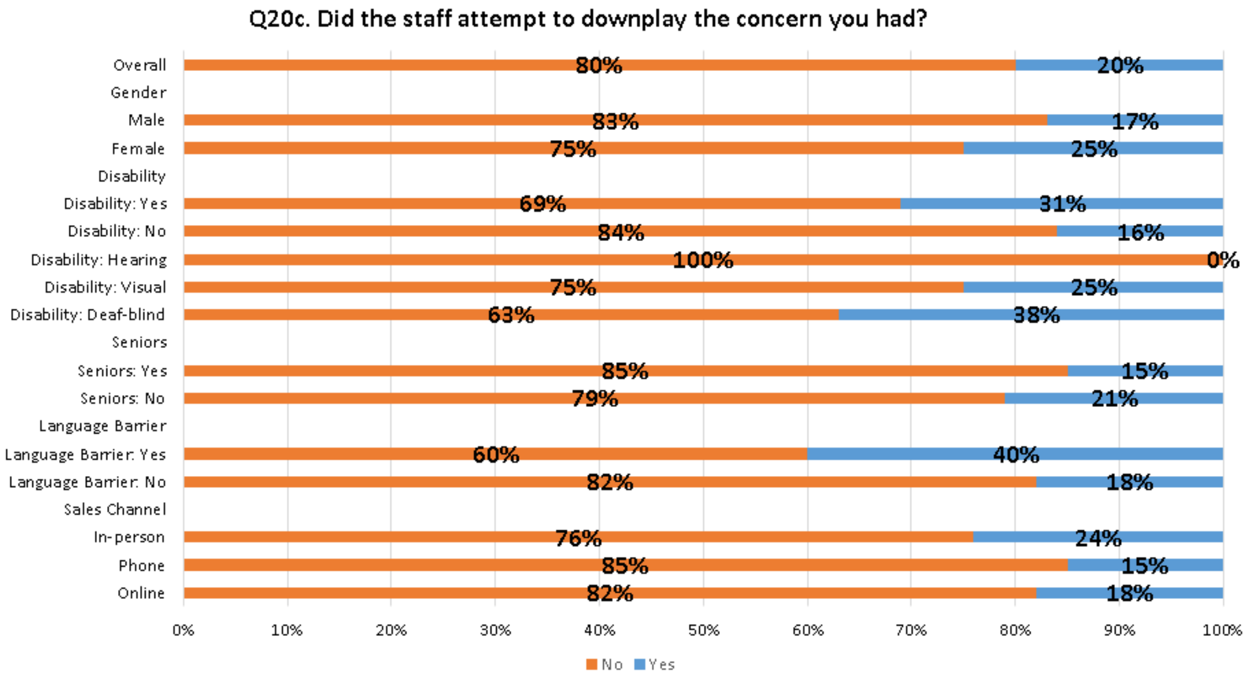
Region

Among the provinces, Ontario had the highest rate of shoppers declining the offer of additional products or services at 22%, followed by Quebec with 21%, Prairies at 15%, British Columbia at 9%, and Atlantic at 7%.

Salesperson Offering Advice to Address Shoppers’ Concerns VS. Attempting to Downplay Shoppers’ Concerns

In total, 33% of shoppers asked questions or expressed concerns about the recommended product or service during their sales interactions. The concerns included things such as overage fees, the offering of services that are not needed, and the product or service including allowances either much greater or lower than the actual stated need. It is concerning that among those who expressed concerns, 34% of shoppers indicated that the salesperson did not offer any helpful tips to address their concerns, and 20% of the salespeople attempted to downplay concerns expressed by the shoppers.





Gender

Between the genders, salespeople were much more likely to attempt to downplay a female shopper's (25%) concerns compared to a male shopper (17%).

Accessibility

Shoppers with disabilities (51%) were almost twice as likely to not be offered any advice they considered helpful to address their concerns, compared to shoppers without a disability (28%). In addition, salespeople were almost twice as likely to downplay concerns expressed by shoppers with disabilities (31%) compared to shoppers without a disability (16%).

Among shoppers with disabilities, the three shoppers who are deaf were all offered helpful tips on addressing their concerns. However, only 42% of the 12 shoppers who are blind or partially sighted were offered helpful tips on addressing their concerns, compared to 44% of the 16 shoppers who are deaf-blind.

Language Barrier

Shoppers with language barriers (47%) were significantly more likely to not have their concerns addressed by sales salesperson compared to shoppers without language barriers (33%). Furthermore, salespeople were more than twice as likely to downplay the concerns expressed by a person with language barriers (40%) compared to a person without a language barrier (18%).

Seniors

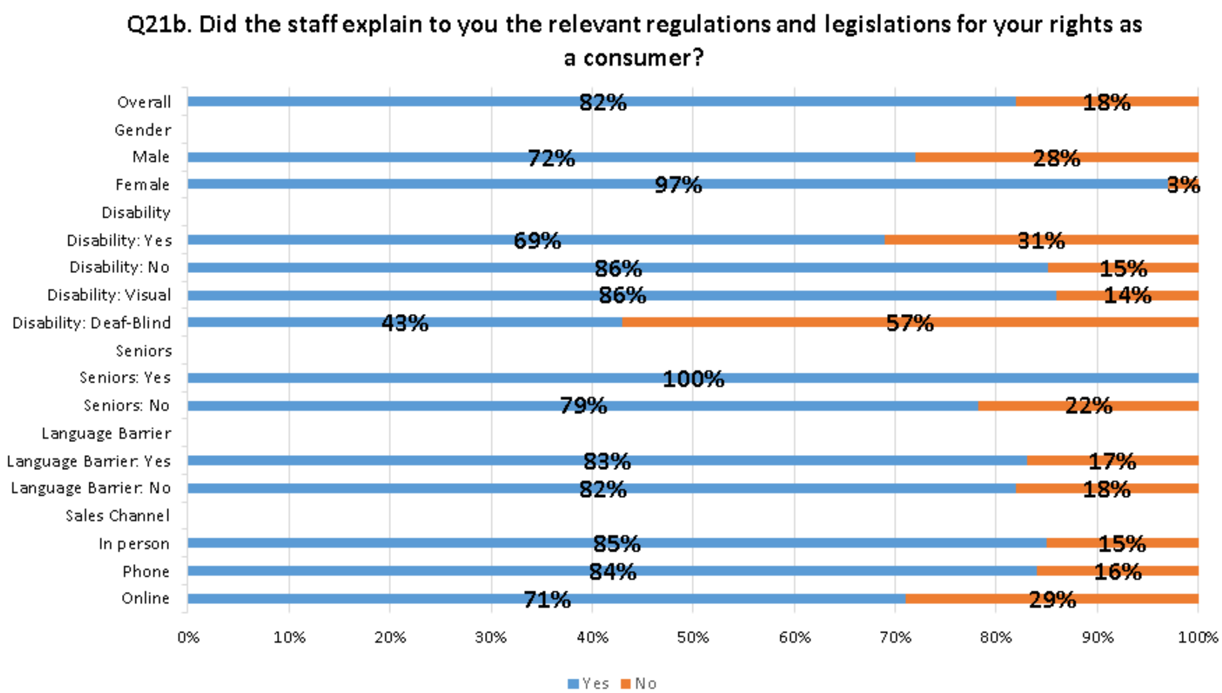
Shoppers who are seniors were significantly more likely to be offered helpful tips on addressing their concerns about recommended products or services compared to shoppers who are not senior, at 85% and 63%, respectively. In addition, senior shoppers were also significantly less likely to have their concerns downplayed by a salesperson, at 15%, compared to 21% for non-senior shoppers.

Language

English-speaking shoppers (38%) were significantly more likely to not receive any helpful advice to address their concerns compared to French shoppers (19%).

Salesperson’s Knowledge about the rights of a Consumer of Telecommunication Services

During this study, 37% of shoppers raised concerns about their rights as consumers of telecommunication services during their sales interactions. These concerns include trial periods without penalties or early cancellation fees for mobile devices, cancellation fee of contracts after 2 years, caps on data overage charges, etc. For those who expressed concerns about their rights as a consumer, about 82% received satisfactory answers regarding the relevant consumer protections, and only 38% were offered any information on the process of filing a complaint, in the event of issues in the future.



Accessibility

Shoppers with disabilities (69%) were significantly less likely to be offered the appropriate information on their rights as consumers compared to shoppers without disabilities (86%). Shoppers who are blind or partially sighted were twice as likely to be offered information on the relevant consumer protections than shoppers who are deaf-blind (86% and 43%, respectively).

Language Barrier

Shoppers with a language barrier were similarly likely to be offered explanations on consumers’ rights compared to shoppers without a language barrier, with 83% and 82% respectively. However, shoppers with language barriers were less likely to be offered any information on the process of filing complaints in the event of future issues (33%), compared to 38% of shoppers without a language barrier.

Seniors

Shoppers who are seniors were significantly more likely to be offered explanations on the relevant consumer protections (100%), compared to non-senior shoppers (79%). Furthermore, shoppers who are seniors were significantly more likely to be offered information on the process of filing a complaint in the event of future issues (54%), compared to non-senior shoppers (35%).

Language

English-speaking shoppers were significantly more likely to be offered information on the process of filing a complaint (43%) compared to French-speaking shoppers (12%).

Gender

Among those who expressed concerns about their consumers' rights, female shoppers (97%) were significantly more likely to be offered the appropriate information on their consumers' rights than their male counterparts (72%).

Sales Channels

Salespeople during in-person and over-the-phone interactions were significantly more likely to offer the correct information on their consumers' rights compared to online interactions, with 85%, 84%, and 71% respectively. As well, salespeople during in-person interactions (42%) were significantly more likely to offer information on the process of filing a complaint, compared to phone (32%) and online shops (32%).

Contract Delivery*

Out of the ten shoppers who made purchases during their mystery shops, they indicated they all expressed consent for the plans they signed up for. However, three out of those ten shoppers indicated that the details outlined in the contract did not match with the terms they agreed to during the sales interaction.

In addition, a critical information summary (a one- or two-page document that summarizes the most important elements of the contract for the customer) was only provided to six out of the ten shoppers.

Out of the five shoppers who have made purchases during their in-person mystery shops, two were not provided a permanent copy of the contract immediately after they agreed to the contract.

There were two shoppers who purchased prepaid plans and they both indicated that the salesperson did not explain to them the conditions related to the prepaid balance (i.e. monthly fees, how much per text for U.S. or international picture and video messages, how many minutes of local calls, how much per minute of additional usage, etc.).

*Please note that, due to the nature and the scope of this Secret Shopper Project, the sample size for the 'contract delivery' portion of this project was not statistically significant enough to draw any meaningful conclusions. These limited results do seem to indicate that there is value in future secret shopper projects assessing the whole experience to better understand consumers' concerns and their experiences.

Accessibility

It is evident from the results of this study that shoppers with disabilities face significant difficulties in accessing appropriate telecommunication goods or services that accommodate their needs.

Out of all shoppers who have a disability, only 34% of them received recommendations on products or services that were suitable to their accessibility needs. 25% of shoppers who are deaf or hard of hearing were recommended appropriate products or services, 24% of shoppers who are blind or partially sighted received appropriate recommendations, and 42% of shoppers who are deaf-blind received appropriate recommendations.

Two shoppers, one who is blind or partially sighted and the other, who is deaf-blind, made purchases, and neither were asked whether they needed their contract in an alternative format. It is worth noting that the Wireless Code requires providing contracts in alternative format upon request, not that they be provided as a rule.

In addition, during their sales interactions with shoppers with disabilities, only 25% of the salespeople mentioned any accessibility related rebates or plans, and 15% mentioned that the trial period for consumers with a disability is 30 days (compared to 15 days for consumers without a disability).

55% of shoppers with a disability felt that they were given sufficient accommodation to make an informed decision.

Language Barrier

As evident in the analysis from previous sections, shoppers with language barriers also face significant barriers in accessing telecommunication products or services.

Shoppers with language barriers were significantly less likely to find the information provided as clear and simple (82%) compared to shoppers without a language barrier (89%).

Furthermore, shoppers with language barriers were significantly less likely to feel that they were given sufficient time to make an informed decision compared to shoppers without a language barrier, with 78% and 88% respectively.

When expressing concerns about the recommended product or service, shoppers with language barriers were significantly less likely to be offered helpful tips on addressing their concerns than shoppers without a language barrier, with 53% and 68% respectively.

Qualitative Insights

During the Secret Shopper Project, there was only one opportunity to test the ease with which Canadians who need a sign language interpreter to avail themselves of services offered by Service Providers.

We hired a shopper who is deaf to bring in a sign language interpreter to an in-store visit. The sign language interpreter’s attempt to invoice for her services, an option that the service provider advertises as being available, has proven very difficult.

Although both the head office and store owner were aware of this accessibility option, both initially refused to accept the invoice. The head office insisted that the invoice must come from the store, and the store owner was dismissive - claiming that it wasn’t their problem because they were a franchise.

Fortunately, the franchise owner eventually accepted the invoice after some back and forth.

Salespeople were also significantly more likely to downplay concerns expressed by shoppers with a language barrier (40%) compared to shoppers without a language barrier (18%).

Among mystery shoppers who had language barriers, only two thirds of them indicated that the salesperson made an attempt to accommodate the language barrier (64%). Of those, 89% indicated that the accommodation was successful in overcoming the language barrier. This means that only more than half (57%) of all shoppers with language barriers were able to complete their sales interaction with a successful accommodation.

55% of shoppers with a language barrier felt that they were given sufficient accommodation to make an informed decision.

Cancellation

Among the ten shoppers who made a purchase, five attempted to cancel their purchase within the trial period, and two out of these five shoppers indicated that the staff made it difficult for them to cancel their service.

Conclusion

In light of the finding of the Secret Shopper Project, it appears that while the majority of the sales interactions were perceived to be positive, some shortcomings were also identified in the customer experience. For example, more than one quarter of shoppers felt that the recommended product or service was not appropriate for their needs (26%), one in ten shoppers felt they faced aggressive sales practices (11%), and about 6% of shoppers not only were offered products they felt were unnecessary, but persistence by the salesperson to overcome their objection.

The overall satisfaction rates across key metrics (i.e. appropriate products or services recommendation, misleading sales practices, pressuring consumers to sign up, offering unwanted services, etc.) were approximately 80%. This means that 1 in 5 potential consumers perceived that they may have faced misleading or aggressive sales practices, which is still a significant number.

As noted in this Report, it appears that customers who may be more vulnerable due to a disability or a language barrier do perceive they are more affected by inappropriate product or service recommendations, unclear information provided during the sales interaction, and given insufficient time to make an informed decision. However, in some instances, they may be less so. For example, 9% of shoppers with a language barrier felt pressured by an employee to make a purchase compared to 12% of shoppers without a language barrier. It appears that customers who may be more vulnerable due to age are not reporting being more affected by misleading or aggressive sales practices.

Lessons learned

The Secret Shopper Project revealed some interesting insights that can help improve future research projects in this area.

1. The research design phase did not anticipate a scenario where a shopper would face rude remarks, and/or being refused service due to certain factors (language barrier, inquiring about prepaid service which is deemed not as profitable, etc.). As a result, questions on this topic were not included in the questionnaire and thus could not be quantified.

   However, from the interactions between Forum Research staff and mystery shoppers, as well as analyzing the open-ended (qualitative) responses by mystery shoppers, it is evident that there is a sizeable portion of the sales interactions that involved salespeople being rude to shoppers and on occasion even refusing service and telling them to go to another service provider.

   Questions on this area could be included in future questionnaires in order to quantify such difficulties in the sales interactions.

2. An interesting result of the Secret Shopper Project is that, in sharp contrast to other demographics who may be more vulnerable to misleading or aggressive sales practices, such as people with disabilities and people with language barriers, senior shoppers were either equally or more satisfied on most metrics during the sales interaction and further analysis on qualitative data revealed that senior shoppers were also offered a more diverse range of products or services compared to non-senior shoppers.

Further analysis in this area in future projects may be helpful in not only determining the factors behind this trend, but potentially using the insights to inform accommodation efforts for other demographics.

3. As part of the Secret Shopper Project, a limited number of secret shoppers completed the process and made a purchase, despite the fact that Forum Research had doubled the pay rate for a shop with a completed purchase. This is due to the fact that applications for telecommunications products or services may involve a credit check, thus potentially lowering a shopper's credit score. Furthermore, shoppers were concerned that the cancellation process would be cumbersome due to their lack of trust in the Service Providers' fee structures, and the possibility that salesperson would make the cancellation process difficult.

   Forum Research would not recommend making it mandatory for shoppers to complete purchases since it poses a risk of financial harm to the shoppers, especially considering the fact that this Project involves vulnerable demographics such as people with disabilities, language barriers, and seniors.

   This can potentially raise questions on research ethics guidelines outlined by the Canadian Interagency Advisory Panel on Research Ethics, in particular Chapter Two, Section B[3]. These guidelines are advisory in nature, but offers helpful insights on responsible conduct on research projects involving live subjects.

   Based on limited findings stemming from shoppers that completed the sales process and made a purchase, it appears that there would be value in assessing the whole sales interaction more widely to assess compliance with consumer protections, including by having more shoppers complete their purchases and attempt to avail themselves of a trial period.

4. The design of the research methodology, in particular the sampling plan, was sound. However due to the size and scope of this Secret Shopper Project, the number of shops allocated to certain quotas was sometimes insufficient to draw statistically significant conclusions. For example, SaskTel and Videotron had 8 and 16 mystery shops in total. In addition, the pre-defined quota of 13 for each of the quotas for shoppers who are deaf or hard of hearing, blind or partially sighted, and deaf-blind were also not statistically significant enough to draw any meaningful conclusions.

   There are potentially opportunities for adjustments in the sampling plan for future secret shopper projects to allow statistically significant samples.

[3] https://ethics.gc.ca/eng/tcps2-eptc2_2018_chapter2-chapitre2.html#b

Appendix A: Questionnaire

PLEASE NOTE:

- You are not allowed to bring and complete the questionnaire while you conduct your shop.
- Please remember you are an impartial party, and are only to speak to events that occur during the shop.

Section 1: Shop Details

Q1. Shop Scenario

- New service for occasional use: Inquired about a new phone and low-cost plan that covers occasional or limited usage.
- Upgrade for existing plan: or new customer looking for a plan for regular usage.
- Downgrade for existing plan: Existing or new customer looking to either lowering their monthly bill, or prevent overages.
- Plan for accessibility needs: Person with disability looking to meet their accessibility needs.

Q2. In what language was the shop completed in? (Select one)

- English
- French
- Others, please elaborate.
- A mix of French and English
- ASL
- LSQ

Q3. Which telecommunications company did you go to complete your mystery shop?

- Bell
- Rogers
- Telus
- SaskTel
- Freedom
- Videotron

Q4. Are you a 'new' or 'existing' customer for this scenario?

- New
- Existing

Q5. Which type of phone plan did you inquire about during your shop?

- Postpaid contract (i.e. monthly plans, term contracts, etc.)
- Prepaid contract (i.e. pay-as-you-go or prepaid plans)
- Both

Q6. Please indicate how you completed your shop:

- In person
- Phone call
- Online chat

Q7. Did you make a purchase in your shop?

- Yes
- No

If Q7=yes, ask Q8

Q8.What was the name of the product/service that you bought?
Please elaborate.

If Q7=yes, ask Q9

Q9. Which type of phone plan was part of your purchase?

- Prepaid plan with own phone
- Prepaid plan with new phone
- Postpaid plan with own phone
- Postpaid plan with new phone

Section 2: Demographic questions

Q10. What is your gender?

- Male
- Female
- Other, please specify.

Q11a. Do you consider yourself a person with disability and/or have accessibility needs?

- Yes
- No

If Q11a=Yes, ask Q11b

Q11b. If you have a disability, which type of disability do you have?

- Hearing
- Visually impaired or blind
- Hearing and visual impairment and/or Deaf-blind
- Fine motor skill disabilities
- Cognitive disabilities
- Other, please specify.

Q12. Did you experience a language barrier during your interaction with the staff?

- Yes
- No

Q13. How old are you (as of the date of the shop)?
Please specify.

Section 3: General Impression

Q14. Do you feel that the recommended product was appropriate for your needs?

- Yes, please elaborate.

- No, please elaborate.

Q15. Was the information provided to you clear and simple?

- Yes
- No, please elaborate, noting details on why you thought it was not clear.

Q16. Do you feel you were given sufficient time to make an informed decision?

- Yes, please elaborate.
- No, please elaborate.

Q17. Do you feel that any of the information provided to you was misleading?

- Yes, please specify by providing details of the interaction, making sure to explain in detail why you thought it was misleading or not.
- No

Q18. At any point during your mystery shop, did you feel pressured by an employee to sign up or consider a product/service?

- Yes, please specify by providing details of the interaction.
- No

Q19a. Did you decline any additional recommendations for products/services that were not suitable to your needs?

- Yes
- No

If Q19a=yes, ask Q19b

Q19b. When you declined a product/s, was the employee persistent in attempting to overcome your objection?

- Yes, please elaborate.
- No, please elaborate.

Q20a. Did you have any concerns about the plan that was recommended to you? (i.e. overage fees, services you may not need, allowances that are much greater or lower than your specified needs, etc.)

- Yes, please elaborate what your concern was.
- No

If Q20a=yes, ask Q20b

Q20b. Did the staff offer any helpful tips on addressing your concerns, such as overage fees?

- Yes, please elaborate.
- No, please elaborate.

If Q20a=yes, ask Q20c

Q20c. Did the staff attempt to downplay the concern you had?

- Yes, please elaborate.
- No, please elaborate.

Q21a. During the interaction, did you raise any concerns about your rights as a consumer of telecommunication services? (15 days to return new phone penalty free, no cancellation fee after 2 years, caps on data overage charges, etc)

- Yes
- No

If Q21a=yes, ask Q21b

Q21b. Did the staff explain to you the relevant regulations and legislations for your rights as a consumer?

- Yes, please elaborate, making sure to note any details on what/how the staff explained your rights.
- No, please elaborate, did they offer an explanation on why they were not able to provide the information?

If Q21a=yes, ask Q21c

Q21c. Did the staff provide any information on the process of filing a complaint, in the event of issues in the future?

- Yes
- No, please elaborate, did the staff explain why they were not able to do so?

If Q7=yes, ask Q22

Q22. Did you provide express consent for any plans you actually signed up for? (Express consent means that you clearly agreed in writing, electronically, or orally to sign up for the plan).

- Yes
- No

Section 4: Contract delivery

(made a purchase, purchased postpaid plan)

If Q7= Yes, and If Q9= C or D, ask Q23

Q23. In terms of the delivery of the contract, were you offered…

- Electronic contract
- Paper contract
- Both

(made a purchase, shop in person)

If Q7= Yes, If Q6= in person, ask Q24

Q24. Was a permanent copy of the contract provided immediately after you agreed to the contract?

- Yes
- No, please elaborate, did the staff offer an explanation on why you did not receive a copy.

(made a purchase, shop in phone call or online)

If Q7= Yes and Q6=Phone call or Online chat, ask Q25

Q25. Did you receive the contract in hard copy or an electronic version?

- Hard copy
- Electronic version

If Q7= Yes and If Q6= phone call or online chat, and If Q25=hard copy, ask Q26

Q26. Did you receive the contract within 15 days of you agreeing to the contract?

- Yes
- No

If Q7= Yes and If Q6= phone call or online chat, and If Q25=Electronic version, ask Q27

Q27. Did you receive your contract within 1 business day?

- Yes
- No

If Q7= Yes, ask Q28

Q28. Was a critical information summary, a one- or two-page summary of the contract[4], provided to you?

- Yes
- No

If Q7= Yes, ask Q29

Q29. Did the details outlined in the contract match with the terms you agreed to during the sales interaction?

- Yes
- No, please elaborate

If Q7= Yes and if Q9=A or B, ask Q30

Q30. Did the staff explain the conditions related to the prepaid balance to you? (monthly fees, how much per text for U.S./international picture and video messages, how many minutes of local calls, how much per minute of additional usage)

- Yes, please elaborate.
- No, please elaborate.

[4] This document summarizes the most important elements of the contract for the customer.

Section 5: Accessibility

(if disability, or language barrier)

If Q11a=A, or Q12=A, ask Q31a

Q31a. Did you do any research online regarding any accommodation that the service provider can provide for any accessibility needs or language barriers?

- Yes
- No

If Q31a=A, ask Q31b

Q31b. Please elaborate on what you found online, were you able to find the right accommodations that suited your needs?

____

(If disability is hearing and hearing and visual)

If Q11a= yes, If Q11b=A or If Q11b=C, ask Q32a

Q32a. Did you contact the store prior to the visit to make arrangements for a sign language interpreter?

- Yes
- No

If Q11a= yes, If Q11b=A or If Q11b=C, If Q32a=A, ask Q32b

Q32b. Was a sign language interpreter present when you visited the shop?

- Yes
- No, please elaborate.

If Q11a=yes, If Q11b=A or If Q11b=C, If Q32a=A, if Q32b= A, ask Q32c

Q32c. Was the sign language interpreter able to provide adequate accommodation for your accessibility needs?

- Yes
- No, please elaborate.

If Q11a=Yes, ask Q32d

Q32d. Were you recommended accessibility specific products/services suitable to your accessibility needs?

- Yes
- No

If Q07= yes, If Q11b=B, If Q11b=C, ask Q33a

Q33a. Were you asked whether you needed your contract in an alternative format?

- Yes
- No

If Q7= yes, If Q11b=B, If Q11b=C, If Q33a=A, ask Q33b

Q33b. Was the contract in the alternative format able to accommodate your accessibility needs?

- Yes
- No, please elaborate.

If Q11a=Yes, ask Q34

Q34. Did the sales agent mention any accessibility related rebates?

- Yes
- No

If Q11a=Yes, ask Q35

Q35. Did the sales agent mention that the trial period for consumers with a disability is 30 days?

- Yes
- No

If Q11a=Yes, and/or If Q12=Yes, ask Q36

Q36. Do you think you were given sufficient accommodation to make an informed decision?

- Yes, please elaborate.
- No, please elaborate.

If Q12=Yes, ask Q37

Q37. Did the staff make an attempt to accommodate the language barrier?

- Yes, please elaborate.
- No, please elaborate.

If Q12=Yes, If Q37=Yes, ask Q38

Q38. What was the accommodation?
Please elaborate.

If Q12=Yes, If Q37=Yes, ask Q39

Q39. Was the accommodation successful in overcoming the language barrier?

- Yes, please elaborate.
- No, please elaborate.

If Q07=no, end questionnaire using *A1.

Section 6: Cancellation

If Q07=yes, ask Q40

Q40. You indicated that you made a purchase of a product/service, did you need to cancel the plan?

- Yes
- No

If Q07=yes, If Q40=yes, ask Q41

Q41. When you requested to cancel your service, did the staff make it difficult for you to cancel?

- Yes, please elaborate.
- No, please elaborate.

End questionnaire using prompt A1

***A1: Thank you for your time for completing this questionnaire.**