

Telecommunications and Customer Service: Where Are We?

Final Research Project Report
Submitted by Union des consommateurs
To Innovation, Science and Economic Development Canada's
Office of Consumer Affairs



June 2018

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Union des consommateurs received funding from Innovation, Science and Economic Development Canada's Contributions Program for Non-profit Consumer and Voluntary Organizations. The views expressed in this report are not necessarily those of Innovation, Science and Economic Development Canada or the Government of Canada.

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TABLE OF CONTENTS

| | |
|--|-----------|
| UNION DES CONSOMMATEURS, <i>STRENGTH THROUGH NETWORKING</i> | 4 |
| INTRODUCTION | 5 |
| 1 EVOLUTION AND CURRENT STATE OF CUSTOMER SERVICE | 6 |
| 1.1 A Brief History of a Long Relationship | 6 |
| 1.2 Customer Service and the Telecom Industry | 8 |
| 1.3 Importance of Customer Service for Service Providers | 9 |
| 1.3.1 New Technologies | 12 |
| 2. TELECOM PROVIDERS' CUSTOMER SERVICE: THE SITUATION IN CANADA | 14 |
| 2.1 Assessment of Customer Service | 14 |
| 2.1.1 A (Seemingly) High Level of Satisfaction | 14 |
| 2.1.2 A Preference for Interpersonal Relations | 19 |
| 2.1.3 Some Irritants | 20 |
| 2.1.4 Numerous Complaints to the CCTS | 23 |
| 2.1.5 Customer Service – Behind the Scenes | 26 |
| 2.2 Little Monitoring by the CRTC | 27 |
| 3. REGULATIONS AND CONSUMER PROTECTION IN OTHER COUNTRIES | 31 |
| 3.1 National Frameworks | 31 |
| 3.1.1 United Kingdom | 31 |
| 3.1.2 Australia | 32 |
| 3.1.3 United States | 35 |
| 3.1.4 France | 36 |
| 3.2 OTHER STANDARDS | 37 |
| 4 MEDIATION SERVICES | 41 |
| 4.1. Overview of Mediation Services | 42 |
| 4.2. Mediation Models | 43 |
| 4.2.1. Canada | 44 |
| 4.2.2. France | 46 |
| 4.2.3. United Kingdom | 47 |
| CONCLUSION AND RECOMMENDATIONS | 49 |
| ANNEX 1 | 55 |

UNION DES CONSOMMATEURS, STRENGTH THROUGH NETWORKING

Union des consommateurs (UC) is a non-profit organization comprised of 13 consumer advocacy organizations.

UC's mission is to represent and defend the rights of consumers, with special emphasis on the interests of low-income households. Its activities are based on values cherished by its members: solidarity, equity and social justice, and improving consumers' economic, social, political and environmental living conditions.

UC's structure enables it to maintain a broad vision of consumer issues while developing in-depth expertise in certain programming sectors, particularly via its research efforts on the emerging issues confronting consumers. Its activities, which are nation-wide in scope, are enriched and legitimated by its field work and the deep roots of its member associations in the community.

Union des consommateurs acts mainly at the national level by representing the interests of consumers before political or regulatory authorities, in public forums or through class actions. Its priority issues, in terms of research, action and advocacy, include household finances and money management, energy, issues related to telephone services, radio broadcasting, cable television and the Internet, public health, financial products and services, and social and fiscal policies.

INTRODUCTION

“Stay on the line,” “All our agents are busy,” “Your call is important to us,” “This call may be recorded for quality purposes...” Is there anything more unpleasant than to wait long minutes to the sound of elevator music for a response from customer service which all too often will prove to be unsatisfactory? It appears that most consumers have a repertoire of stories of calls to customer service that are both frustrating and comical. Communications service providers sadly appear to take the cake in this respect. It is very ironic that those who are in fact responsible for providing us with access to communications are so difficult to reach by the average person. And that contact, once established, generates a dialogue of the deaf.

The customer service of telecom providers has not stopped generating grievances over the years. And even with the implementation of the new codes of conduct of the Canadian Radio-television and Telecommunications Commission (CRTC) and provincial legislation, the situation does not appear to have improved. In fact, the number of complaints received in this respect by the Commission for Complaints for Telecom-television Services (CCTS) has tripled over the last four years, even though the Commissioner is powerless to help consumers with this issue.

What are consumers' main sources of frustration regarding customer service? What are the providers' customer service standards? Are they adequate for meeting consumers' needs? Our initial hypothesis is that several telecom industry players lack guidelines in this area to adequately respond to their customers' demands and complaints. This is in fact what will be verified by our study, the aim of which is to review the situation in Canada and find viable solutions, if needed.

A literature review will enable us to first provide the background, then to identify, regarding telecommunications services, the main sources of complaints relating to customer service in the reports by regulatory authorities and consumer protection bodies, in the media, forums, and other studies on the topic, which will enable us to identify the problems that were reported over the last few years and how the situation has evolved, in such a case.

To determine whether some foreign models may provide any interesting possibilities, we will look at the solutions adopted in the United States, Australia and the UK, as well as in France. We will compare their approaches with the one adopted in Canada.

During our review, we will identify the approaches and measures considered the most innovative or efficient, and will attempt to determine whether they would likely resolve problems observed in the Canadian market with regard to customer service.

During the report, we will present the results of an online pan-Canadian survey carried out among consumers in order to learn about their experiences and perceptions on the issue.

Based on the results of our study, we will draw up a set of recommendations inspired by all the possible solutions that we will have identified in order to resolve the problems found in Canada.

1 EVOLUTION AND CURRENT STATE OF CUSTOMER SERVICE

1.1 A BRIEF HISTORY OF A LONG RELATIONSHIP

Although customer service as it is known today was not formally identified as such, one can easily assume that it dates as far back as trade. In fact, whether in Ancient Egypt, during the Roman Empire or in the Middle Ages, a craftsman or merchant, unless exercising a monopoly in his community, instinctively knew that he had to satisfy his customers if he wanted to survive and develop his trade in the environment of trust created by proximity and familiarity.¹

During this long period that would extend until the late 18th century, the relationship between merchants, craftsmen and customers would basically change very little. However, there are a few exceptions that should be mentioned.²

The first large store was opened in Japan in 1605, and featured an assortment of products defined based on customers' needs... and a refund policy. The end of the 18th century would see the first English industrial revolution and the appearance of the first marketing strategies by manufacturers wanting to expand their market and initiate mass consumption.

The first advertising agency appeared in 1841. The big brands would come shortly afterwards (Coca Cola in 1886, Kodak in 1887, and Heinz in 1888), which, with their attractive packaging, would compete with the generic products that until then had been the only ones available.

At the start of the 20th century, the consumer would become a source of interest for companies. The first market studies were conducted. Starting in 1920, the John Walter Thompson Agency hired a psychologist, J.B. Watson, who stressed the need to understand consumer behaviour.

Starting in the mid-1940s, authors agreed on the key role of the consumer, with some already talking about a "customer culture" and "relational marketing."

With the end of the second world war came the period known as "The Glorious Thirty" (1946-1975), which saw the birth and fast development of the consumer society through strong economic growth and near-full employment. Successful companies and increasingly larger businesses had to deal with more and more customers. Marketing enjoyed renewed favour³.

Until the early 1960s, customer service was mainly conducted on an interpersonal basis, face to face, most often in stores, but also in service companies, which were growing in number. The relationship of trust with the customer, which until then was often based on a person's word confirmed by a handshake, was becoming formalized over time. Moreover, word of mouth, which still serves as a key barometer for measuring the level of customer satisfaction, could be just as beneficial as devastating for business.

¹ Based on an article on customer relationship management: Charlotte GOYARD, *L'histoire et les origines de la GRC*, appvizer Magazine, August 2, 2016. Online: <https://www.appvizer.fr/magazine/relation-client/customer-relationship-management-crm/histoire-et-les-origines-de-la-grc-1470121957>.

² Guy COUTURIER, *Historique du Marketing*, Viadeo, November 22, 2012. <http://fr.viadeo.com/fr/groups/detaildiscussion/?containerId=0024fmlsgrfe118&forumId=0021jx3x6p9vg9p9&action=messageDetail&messageId=0021ouzkwnqt6qoz>.

³ SALESFORCE, *La petite histoire du CRM*, Salesforce, February 27, 2018. <https://www.salesforce.com/fr/blog/2018/02/la-petite-histoire-du-crm.html>

However, relations between the merchant or service provider and the consumer would progressively become more complex as the latter's needs and expectations would also change. If, at one time, a customer could sometimes wait days, even weeks, before getting the sought-after object, without feeling that the merchant was at fault, the accelerated development of the consumer society would be a game changer.

Accessibility to products and services would become faster as consumers began having new requirements; they wanted their needs to be met more efficiently than before, for merchants to offer more choice and quality products, more quickly. Consumers also became more demanding regarding after-sales service.

The saying "the customer is always right," already popular in retail trade in the 19th century, resurfaced in the 20th century, then again in the 21st century, as both an advertising slogan and a recurring theme for some online companies.

Let's state the obvious: putting the customer first is simply going back to basics. Forgetting the customer is a historical anomaly. By structuring its entire organization around customer satisfaction, Amazon did not come up with anything new: it merely went back to the basic principles of retail trade...⁴

Although companies or service providers and consumers had long interacted face to face, telephone customer service, still limited at that point in time, began to grow quickly starting in the 1970s. It even became a factor for consumers in assessing a business that provided goods or services.

Two decades later, with the globalization of the economy, customer service would move into a new phase: there was a progressive concentration of local or national companies that were becoming global and that began to provide a multitude of products and services to customers who were culturally diversified and had a wide range of needs.

In fact, the relationship between companies and consumers is inevitably being transformed. Since they are no longer present within communities, multinationals are no longer concerned with the interpersonal aspect that had previously formed the basis of relations between merchants and consumers. They will thus often tend to prioritize marketing rather than customer service, which is often perceived, especially when having to handle consumer complaints, as a necessary evil. Customer service is even sometimes outsourced.

[TRANSLATION] Conventional call centres are generally divided into two sections: outgoing calls and incoming calls.

Company management generally perceives the incoming call section as a cost centre; hence, the emphasis is on the average call time, which must be as short as possible, and each second gained is estimated at thousands of dollars in savings. Sales are limited to a few complementary products that are easy to present, and agents decide to stop selling once they have reached their quota, and then try to attain their target call time by shortening communications with each customer. Once management realizes that the level of customer satisfaction is too low, it eases up a little on call times, but after a productivity meeting with vice-presidents, it tightens up call times once again, and so forth. Those who work in call centres are well aware of this seesaw process.

⁴ DIDUENJOY, *Une petite histoire de la relation client: de la 2CV aux réseaux sociaux* <http://blog.diduenjoy.com/petite-histoire-relation-client>

[...]

*Outgoing calls are generally preferred since they are usually considered profit centres, which results in relative freedom in call time and by leeway of execution in their customer relations arguments. However, calls are generally limited to a targeted clientele and offers to a few products or services.*⁵

Customer service, after face-to-face interaction, followed by the standardized implementation of telephone call centres, is entering a new era of interaction with the establishment of the Internet and social media. This advent of new technologies is revolutionizing consumer habits as rarely before. A consumer can now, with just a few clicks, compare products and services, their price and availability, and purchase them without having to leave home. And a consumer can also often find out what other consumers think of such products or services.

The speed at which consumers have access to all this information is also in the process of modifying their expectations and attitudes towards customer service.

More than half of Americans have scrapped a planned purchase or transaction because of bad service.

33% of Americans say they'll consider switching companies after just a single instance of poor service.

After one negative experience, 51% of customers will never do business with that company again.

*U.S. consumers are willing to spend 17% more to do business with companies that deliver excellent service.*⁶

Companies are thus faced with a new major challenge: customer service must be flexible enough to adapt to the different consumers and different modes of communication, as well as to the diversity of products and services. Merchants must now be able to efficiently ensure all types of interactions with consumers, from the traditional face-to-face to the most recent technological tools. And they must also realize that customer service is not an expense but rather an investment with significant dividends.⁷

Companies are aware that customers have higher expectations and that their representatives need to do more and perform better. However, only 16% of companies who claim to be committed to improving the customer experience are actively involved in trying out new approaches with groups of customers.⁸

1.2 CUSTOMER SERVICE AND THE TELECOM INDUSTRY

The telecom industry, which is what concerns us more, stands out from other businesses because it has operated for a long time, and in many countries, as a monopoly, either state or private. It was only around the late 20th century that governments and regulatory authorities sought and encouraged the industry's deregulation.

⁵ JP MERCIER, *Le futur des centres d'appel et de contact client: le centre relationnel client*, Challenge Action, December 21, 2015 <http://www.challenge-action.com/futur-centres-dappel-de-contact-client-centre-relationnel-client/>

⁶ HELP SCOUT, *75 Customer Service Facts, Quotes & Statistics – How Your Business Can Deliver With The Best Of The Best*, 2017. <https://www.helpscout.net/75-customer-service-facts-quotes-statistics/>

⁷ GROUPE MARKETING INTERNATIONAL, *Service à la clientèle: l'importance de la valeur perçue*, August 21, 2016. <https://groupemarketing.ca/service-a-la-clientele-limportance-la-valeur-percue/>

⁸ L'ATELIER BNP PARIBAS, *Service consommateur: les 5 technologies à ne pas manquer*, August 2016. <https://atelier.bnpparibas/retail/article/service-consommateur-5-technologies-manquer>

Is it precisely because of the relatively recent occurrence of the above deregulation that the type and quality of the customer service provided by telecom companies is basically not reviewed very much and that supervisory measures are infrequent? Even interest on the part of consumer groups on this issue appears to be fairly recent.

In fact, most of the associations, groups and magazines interested or involved in the telecom industry which we contacted during our study have not focused until now on the specific issue of first-line customer service other than through the complaints that are received or by surveys to assess the current situation.

Sven Scharioth, from Verbraucherzentrale Bundesverband (VZBV), the German federation that brings together the country's largest consumer associations, wrote in an e-mail that although their organization determined that certain problems related to telecom providers' customer service were recurrent, it was only in 2018 that VZBV chose to focus on them.

For its part, the Fédération romande des consommateurs in Switzerland has not really focused on the quality of customer service; however, as is the case in Germany and other parts of Europe, the exponential development of new telecommunications technologies, with all the associated concerns and problems, led the organization to attempt to anticipate or resolve the complaints submitted by consumers rather than look at grievances regarding customer service shortcomings (e.g. accessibility, wait times, courtesy, lack of user friendly technology), for lack of resources.

In fact, regulatory authorities and several consumer associations, in both Europe and Australia or the U.S., are involved more on conducting comparative studies of service providers to determine those with the best quality/price ratio, while customer service (information, complaints, follow-ups) is rarely a key factor in the studies carried out by these organizations.

As we will see, concrete policy-related or regulatory initiatives are tried out or implemented in some countries to better protect consumers and encourage companies to offer better customer service. However, consumer grievances are most often expressed through survey results, complaints on traditional media or social media, and even in stand-up comedy routines.

1.3 IMPORTANCE OF CUSTOMER SERVICE FOR SERVICE PROVIDERS

There is a new synergy between the marketing and customer service departments in companies concerned about adapting to the new consumer trends. Companies that are more conservative in their structure and approach have long conceived their customer service as a mere complaint box and limited access to such a box as much as possible, so that their reports could state that all was well.

However, a study conducted in 2015 by The Economist Intelligence Unit⁹ shows that 59% of companies that give priority to investing in their customer service see a significant increase in their sales. It would appear that customer service is increasingly becoming a key competitive element among companies, regardless of the industry involved.

⁹ GENESYS, *Investir dans l'expérience client: un gage de rentabilité, d'augmentation du chiffre d'affaires et de fidélisation des clients*, June 23, 2015. <http://www.genesys.com/fr/about/newsroom/news/les-dirigeants-doivent-montrer-la-voie-de-l'engagement-client-selon-une-etude-de-the-economist-inte>

While innovations in modes de communication are occurring at a frenetic pace, the quality of service providers' customer service is becoming increasingly important to Quebec consumers. In an online Léger survey in early 2018, 96% of respondents stated that the quality of customer service relations affects their purchasing decisions, that the image they form of the quality of said service influences their perception of the company and, if they are disappointed, they may decide to not purchase a product or may cancel a subscription.¹⁰

The British organization WHICH? reached the same conclusions in a study published in 2017:

According to our survey, almost three quarters (74%) of those polled will tell friends and family about great customer service. Even more (82%) will tell their friends and family about a poor experience. Nearly nine in ten (87%) go as far as saying that bad customer service puts them off using a brand again¹¹.

Another British organization, the Institute of Consumer Service, in fact noted that for too many years, customer service was considered a secondary element and part of after-sales service, whereas it can play a crucial role in a company's success or failure.¹² Like several others, the organization places an emphasis on the support that must be given to customer service and its personnel, and calls for the adoption of standards by companies.

A tangible product is only one aspect of the supplier/customer relationship. The other aspect is service; indeed, in many businesses, there is no physical product. The only relationship is service.

Service standards are important for customers, potential customers, employees and management of a business. They help to define what a customer can expect and to remind management and employees of the challenge and obligations that they face.¹³

Implementation of Service Standards

Ownership, visibility and commitment are the key words.

Ownership

It starts at the top. The chief executive and top management team must be sponsors and champions. They must 'walk the talk', own the communication process and ensure initial and on-going focus on standards in every employee briefing.

Each service standard must have a management owner, who is accountable for the delivery of the service. Performance against standard will normally be a feature of that individual's annual review.

The management owner will also have the authority to implement process and other changes to improve operational performance. But there is no copyright on ideas, so all colleagues should be encouraged to make suggestions for performance improvement.

[...]

¹⁰ LE LÉZARD, *Troisième Observatoire annuel des services clients d'Édome au Québec – Le Québécois, toujours un consommateur fidèle*, May 29, 2018. <http://www.lelezard.com/communiqué-17092412.html> See also: HELP SCOUT, *75 Customer Service Facts, Quotes & Statistics*. *Op. cit.*, Note 6.

¹¹ Sarah INGRAMS, *What does good customer service look like to you? Which? Shopping*, August 25, 2017. <https://conversation.which.co.uk/shopping/good-customer-service-which-survey-brand-loyalty/>

¹² THE INSTITUTE OF CONSUMER SERVICE, *Our History*. <https://www.instituteofcustomerservice.com/about-us/our-history>

¹³ THE INSTITUTE OF CONSUMER SERVICE, *Setting customer service standards*, June 8, 2015.

<https://www.instituteofcustomerservice.com/research-insight/guidance-notes/article/setting-customer-service-standards>

Commitment

The mission or values of an organisation are a good place to anchor the commitment to customer service.

The chief executive, all levels of management and all employees must be committed to delivering the promise to customers regardless of external or internal influences. It's not easy but remember: service is your best salesman¹⁴.

As experts and marketing studies and consumers were able to guide business models, experts and customer service and client relations analysts all over the Western world are now setting out the current course to follow, which is to decompartmentalize services that until quite recently were operating in a silo in order to establish a new type of customer relationship:

[TRANSLATION] The term omnichannel refers to the fact that all possible contact and sales channels between the company and its customers are used and applied. This concept may equally refer to contacts made at the initiative of customers or prospects or those originating from the company.

A successful omnichannel practice assumes that marketing and logistics silos will be eliminated in order to have a 360° view of the customer and optimize the customer experience¹⁵.

Traditional practices are thus put into question. To build customer loyalty and reach new customers, new practices are now required where the customer/consumer plays a much greater role than in the past. This is the approach adopted, in particular, by TD Bank, ranked in 2013 by J.D. Power as [TRANSLATION] “first in customer satisfaction among the eight financial institutions in Quebec, for the 8th consecutive year¹⁶.” This approach summarizes well what an increasing number of customer service experts are advocating.

[TRANSLATION] An outstanding customer service that truly and efficiently meets our customers' expectations consists of five points at TD:

It must be systematically encouraged and backed by management.

It must be integrated in hiring decisions, training programs and incentives.

It must be authentic, human and personalized.

It must make services accessible.

It must be measurable.

[...] To attain the highest standards in customer service, management must create a work environment that favours employee engagement and empowers them. For instance, at TD, our employees can, and must, question our decisions if they are convinced that the approach is not appropriate for our customers.¹⁷

There is an often-mentioned story that depicts how Amazon's founder, as soon as the company was created, perceived the role of the consumer, and why he thought that consumer satisfaction was so important:

¹⁴ *Ibid.*

¹⁵ DÉFINITION MARKETING, *Définition: Omnicanal*, February 15, 2018. <https://www.definitions-marketing.com/definition/omnicanal/>

¹⁶ Christine MARCHILDON, *Le client au cœur de la stratégie*, TD – Information sur l'entreprise – Leadership éclairé, April 3, 2014. <https://www.td.com/francais/a-propos-du-gfbtd/information-sur-lentreprise/leadershipclair/speech.jsp?id=69>

¹⁷ *Ibid.*

[TRANSLATION] During Amazon's first years, its founder, Jeff Bezos, was in the habit of having an empty chair at meetings. He explained to his top executives that they had to think of the chair as being occupied by the customer, "the most important person in the room." Why? Because a customer who is unhappy with service can significantly damage the brand and, as a result, sales. Especially online. "In the real world, if customers are not happy, they will each tell six people. Online, no fewer than 6,000 Web users will know about it," Bezos stated.¹⁸

Apple's success was also built on this basis:

[TRANSLATION] For Shep Hyken, if Apple was able to become a true leader in the tech industry and be recognized as the world's most valuable brand (according to Forbes), it is because it put the customer front and centre. "At Apple, customer service is not a business activity, it's a philosophy. Steve Jobs adopted a customer-centered approach from the start. From innovation to packaging, product transportation to distribution, including after-sales service and continuous training in Apple stores. Everything the company does is centered on the user," says Shep Hyken. And the success of the Apple brand has endured...¹⁹

1.3.1 NEW TECHNOLOGIES

For years, customer service departments managed to limit the scope of their disputes with customers to interpersonal relations. However, the development of new technologies and social networks broke down the walls of what until then had been a private affair, despite the possible proliferation of similar disputes with numerous clients. It has now become possible for a person to share their customer service experience quickly and with many other people.

Hence, with the advent of social media, consumers, who had long been confined to the role of mere service requestors, have become players who are now able to speak out and make themselves heard by a large audience, though not without risk. A company is taking a consumer who posted negative comments on Facebook before the Court of Quebec²⁰, on the grounds that her postings on her personal page constitute defamation that caused the company harm.²¹

Though certain consumers in fact appear to use social media merely to vent, some observers instead believe that there are often altruistic motives behind this, as in wanting others to avoid having the same bad experiences. This would constitute a major shift, since until quite recently, consumers had a hard time admitting they were wrong.

A study conducted in 2014 in Australia by EY reported that 49% of persons surveyed had already posted a comment on social media to report a bad experience; although 16% were

¹⁸ Charlotte KAN, *[Spécial USA] Le service client made in USA*, Actionco.fr, November 30, 2016. <http://www.actionco.fr/Thematique/strategie-commerciale-1218/Breves/Special-USA-service-client-made-USA-311137.htm#GoB1EBh3dQ0rJBI1.97>

¹⁹ *Ibid.*

²⁰ Pierre TRUDEL, *Critiquer à ses risques et périls*, Le Devoir, February 20, 2018.

<https://www.ledevoir.com/opinion/chroniques/520654/critiquer-a-ses-risques-et-perils>

²¹ In December 2017, a court, on an application for declaration of malicious prosecution under Section 51 of the Code of Civil Procedure of Québec, designed to allow motions to have lawsuits dismissed, refused to find that the application was manifestly unfounded and concluded that it was legitimate that the application be examined as to its substance. See: 9227-2202 Québec Inc. c. Kelly, 2017 QCCQ 14883 (CanLII).

looking for a response, 36% of respondents admitted that they only wanted to vent, whereas 19% hoped that their post would negatively impact the merchant involved.²²

In fact, an increasing number of companies are using monitoring software to scan social networks to find out what is being said about them and, potentially, to respond accordingly.²³

Our survey shows that consumers who are dissatisfied with how a complaint or problem is handled by a telecom provider's customer service first complain to their family and friends (69%), then on social media (19%) and traditional media (15%). Given the popularity of social media, there may be an increasing number of posts in the coming years.

So it is not surprising in this regard that, based on a Forrester study conducted in the U.S. and the U.K., 67% of companies consider improving their online customer service a priority.²⁴

Note, moreover, that new technologies may well revolutionize customer service in the very near future. At the Gartner Customer Experience Summit held in Tokyo in February 2018, experts estimated that about 25% of customer service departments in 2020 will be handled by conversational agents with artificial intelligence (called chatbots or Virtual Customer Assistants), compared to only 2% in 2017.²⁵

²² EY, *Customer Experience Series – Cost of complaining*, 2014, p. 10

<https://pdfs.semanticscholar.org/presentation/4fb1/baf5998cb489d0c02433386926776751fec6.pdf>

²³ CONSUMER REPORTS, *Customer Service*, May 2016. <https://www.consumerreports.org/cro/customer-service/buying-guide/index.htm>

²⁴ FORRESTER CONSULTING, *Social Customer Service – Dedicated solutions vs. All-in-one social media management suites*, 2014. https://www.realwire.com/writeitfiles/Conversocial_Forrester%20Report.PDF

²⁵ Alain DE FOOZ, *25% des opérations de service client utiliseront des chatbots d'ici à 2020*, Digital Energy Solutions, February 22, 2018. Online: <https://www.solutions-magazine.com/service-client-chatbots-2020/>

2. TELECOM PROVIDERS' CUSTOMER SERVICE: THE SITUATION IN CANADA

2.1 ASSESSMENT OF CUSTOMER SERVICE

It is difficult – if not impossible – to assess the general efficiency of customer service with any certainty: there are, in fact, few, if any, tools for conducting an in-depth review of the situation.

Furthermore, Canadian companies appear reluctant to provide data on their customer service: the standards that define the quality of their customer service; the process used to check whether the standards are actually being applied; the transmission and handling of systemic problems identified with regard to customer service and by management; the frequency of checks and of the revision of corporate standards; the training of personnel; implementing and overseeing a code of conduct, etc.

Thus, in order to obtain a general view of the situation, surveys must be used, which often report a surprising level of consumer satisfaction regarding companies' customer service, along with the complaints received by regulatory authorities, mediation services and consumer organizations, which must deal with the problems which customer service could not resolve.

However, some dissatisfactions expressed by consumers never or rarely appear in these assessments because they are not issues that can be quantified or they are outside the mandates of mediation services. This is the case, for instance, of aspects such as the behaviour of customer service reps, their language, or the wait time before being able to speak with one of them, the rate of resolution of problems handled by customer service, etc. Nor are there any objective data on the speed of response or the efficiency and quality of the service provided by a specialized technician when required (e.g. connection, installation, repairs or replacement of technical equipment).

2.1.1 A (Seemingly) High Level of Satisfaction

In late 2017, we conducted a survey among 1,540 Canadian respondents subscribed to at least one telecom service.²⁶ Our aim was to see how consumers rated their relations with their telecom providers' customer service and identify the most problematic aspects of this service.

We surveyed respondents on their overall assessment of the services provided by their service providers. As can be seen in the following figure, the general rating is rather positive, with respondents stating that they are generally satisfied with their telecom provider's services (51% "fairly satisfied" and 39% "very satisfied").

When we asked respondents to rate their level of satisfaction in relation to the various aspects of the services provided by their service provider, they stated that price is by far the most negative aspect. Customer service received a highly satisfactory rating, although it is still found among the weakest elements, under the different aspects pertaining to service per se.

²⁶ The full survey report can be found in the annex.

Satisfaction with main service provider regarding various aspects

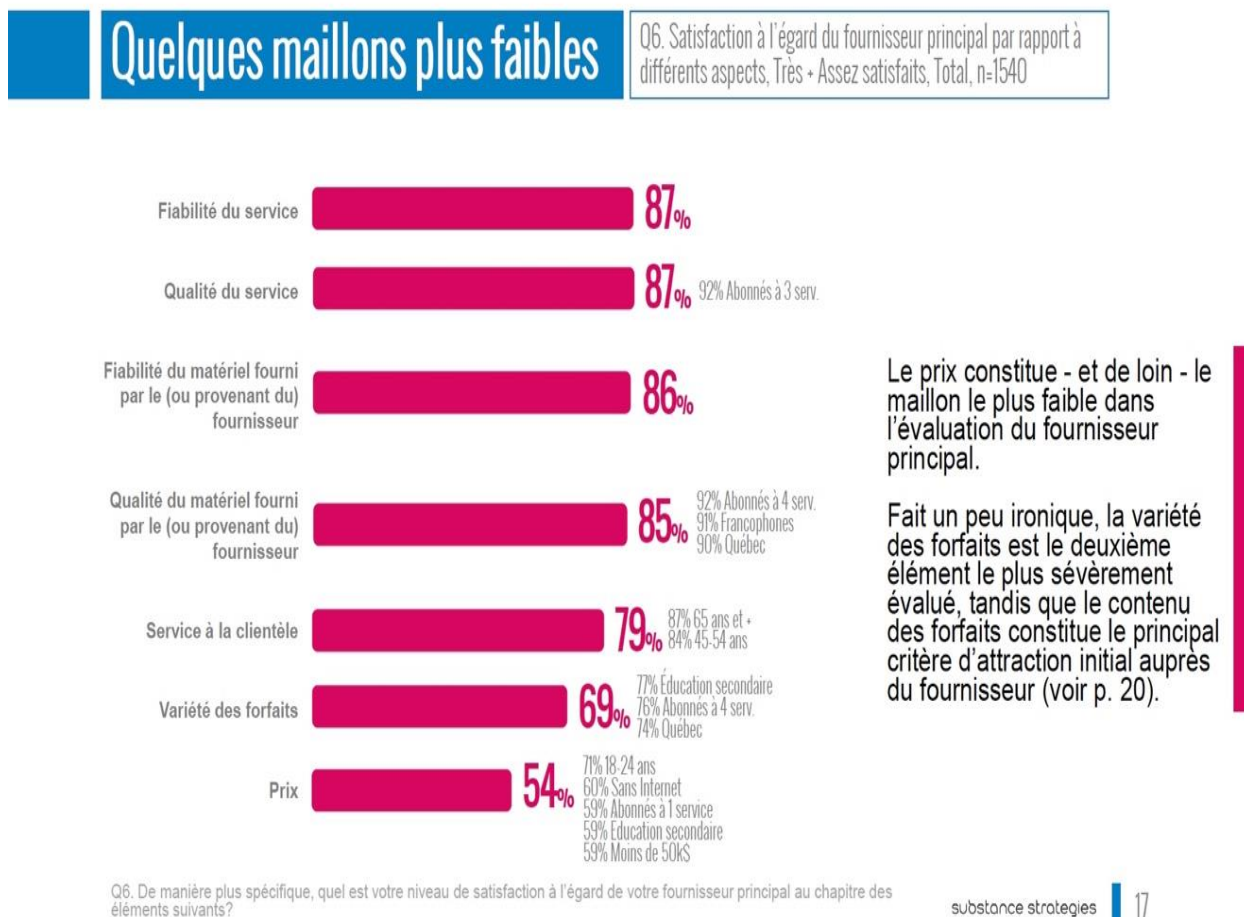


Figure 1 – Substance Stratégies survey, December 2017

We asked respondents who had contacted customer service to provide their overall assessment, based on the telecom service pertaining to their call. The overall level of satisfaction is surprisingly high, regardless of the service.

Overall assessment of customer service, by service

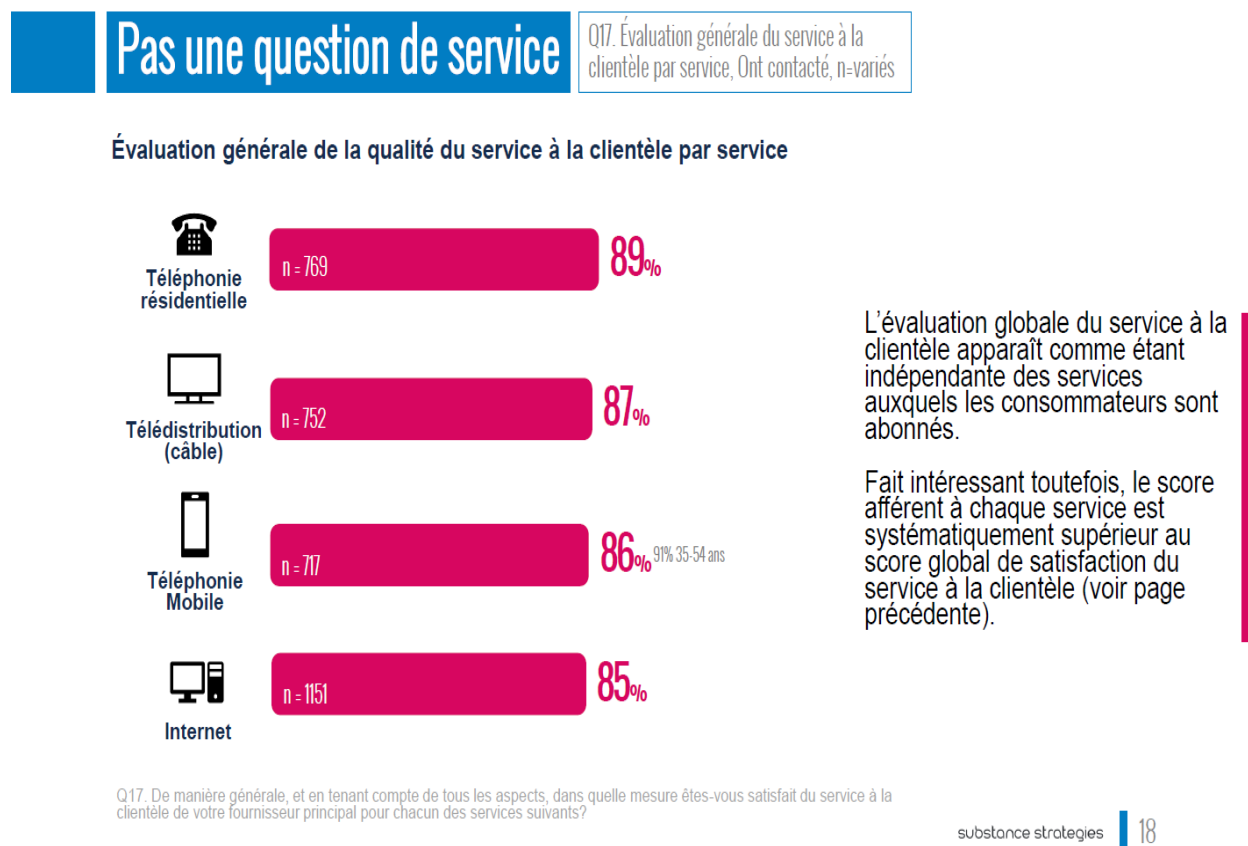


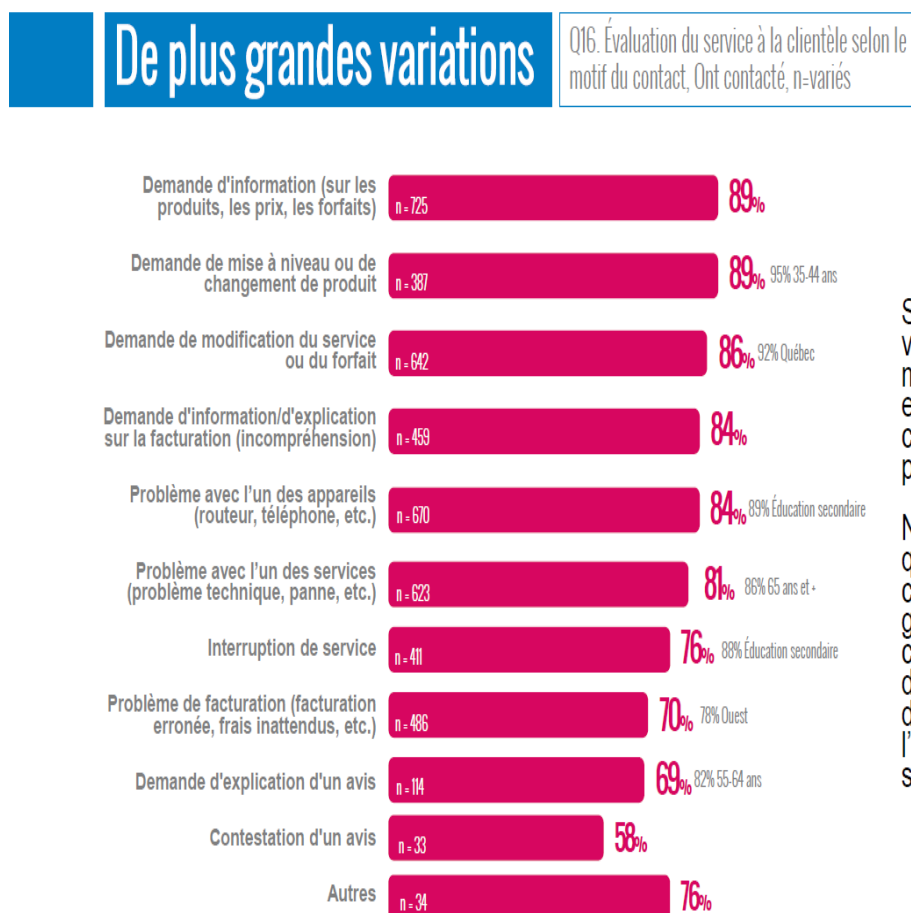
Figure 2 – Substance Stratégies survey, December 2017

This very high percentage of satisfaction reported by respondents is surprising, however. In fact, as we will see later on, the reports by the Commission for Complaints for Telecom-television Services (CCTS), the organization created by the CRTC to gather and handle subscribers' complaints, reveal that complaints regarding customer service, which the CCTS is actually not mandated to handle, account for 27% of all out-of-mandate complaints received by the organization. The number of complaints on the topic, which has in fact doubled in the last year, exceeds that of any other complaint topic reported by the CCTS, within or outside its mandate.²⁷

If the number of complaints received by the CCTS is high, it may be because the situation is not as rosy as the survey results appear to indicate. Moreover, our survey results clearly indicate that the respondents' level of satisfaction tends to drop when the call involves the resolution of a problem rather than just a request for information.

²⁷ COMMISSION FOR COMPLAINTS FOR TELECOM-TELEVISION SERVICES (CCTS), Codes, Stats & Reports. <https://www.ccts-cprst.ca/codes-stats-and-reports/ccts-reports/annual-and-mid-year-reports/>. See also Mid-Year Reports 2016-2017 and 2017-2018.

Customer service rating based on the reason for the contact



Évaluation du contact du service à la clientèle

Si le taux de satisfaction ne varie que très peu selon le mode de communication employé ou le service mis en cause, il en est tout autrement pour le motif de contact.

Nous remarquons à cet effet que les motifs négatifs sont ceux qui génèrent la moins grande satisfaction. Dans ces cas, on peut croire que le rôle du service à la clientèle revient davantage à diminuer l'insatisfaction qu'à bonifier la satisfaction en soi.

Q16. Quelle évaluation faites-vous de la qualité du service à la clientèle de votre fournisseur selon le motif de contact?

substance strategies | 29

Figure 3 – Substance Stratégies survey, December 2017

Note, also, that the survey results differ from those of several other surveys conducted in Quebec and elsewhere.

A survey conducted in Quebec in early 2017 by Extract Recherche Marketing²⁸ on customers' level of satisfaction with the customer service of public and private services shows that Quebecers' level of satisfaction with their telecom providers' customer service is 71%, which puts the latter in second-to-last position (before government services, which come in last with a satisfaction rating of 70%).

²⁸ EXTRACT, Les Québécois sont-ils satisfaits du service à la clientèle qu'ils reçoivent des entreprises?, March 2017. http://www.extractmarketing.com/doc/Rapport_Triad%20Extract.pdf

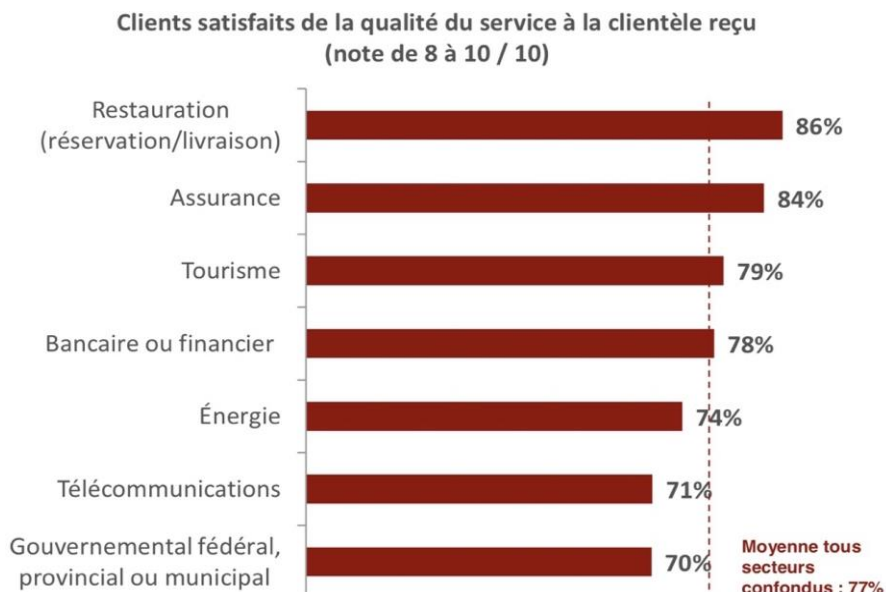


Figure 4: Sondage Extract, March 2017

A similar study conducted in the U.S. in 2015²⁹ that sought to identify the worst customer service reached similar results: telecommunications was ranked second, very close to government services, which had twice the dissatisfaction level, in terms of percentage, of the next service on the list.

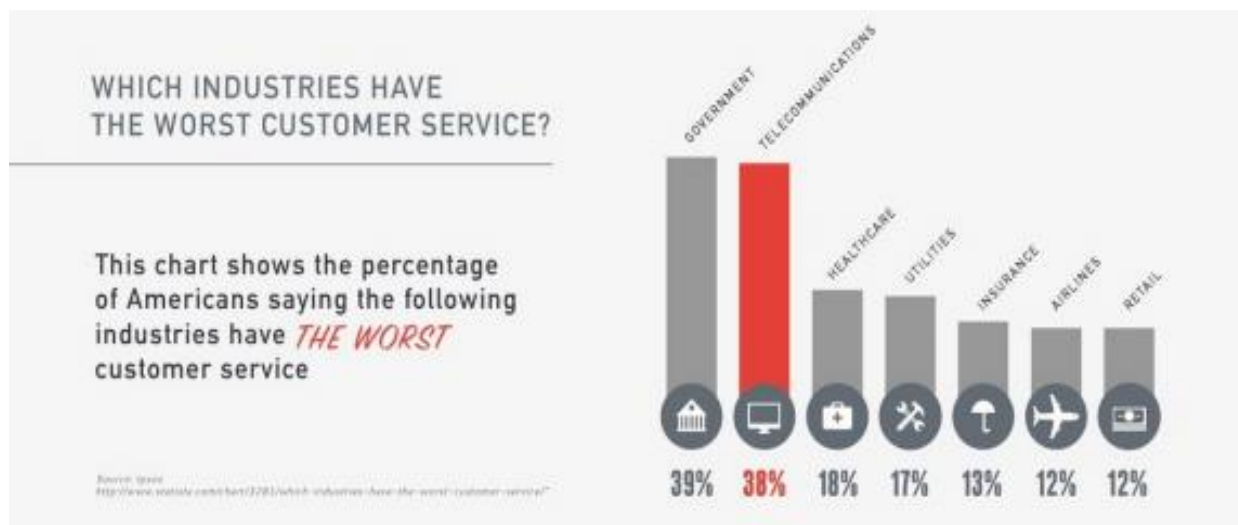


Figure 5 – Sondage Procera, 2015

²⁹ Joey JACKSON, *Survey says telecom has a customer service problem*, RCR Wireless News, May 26, 2015 <https://www.rcrwireless.com/20150526/big-data-analytics/survey-says-telecom-has-a-customer-service-problem>

2.1.2 A Preference for Interpersonal Relations

Companies attempt to make it easier to contact customer service by providing more automated phone services, forums, FAQs and chat options. However, consumers, regardless of what country they are from, still mostly appear to favour live personal contact with customer service reps, and even more so when they have a problem and are trying to resolve it.

A study conducted in France in 2016 by Accenture Strategy³⁰ found that 79% of French consumers wanted to talk to a person live to resolve their problem or even just for some advice. This percentage was 83% when a complaint was involved. 43% of consumers even claim to be prepared to pay more for products or services provided they are given efficient customer service.

Our survey attempted to see the type of communications most frequently used by Canadian consumers to contact customer service. Once again, the telephone is still, by far, the most popular means.

Mode of communication with customer service

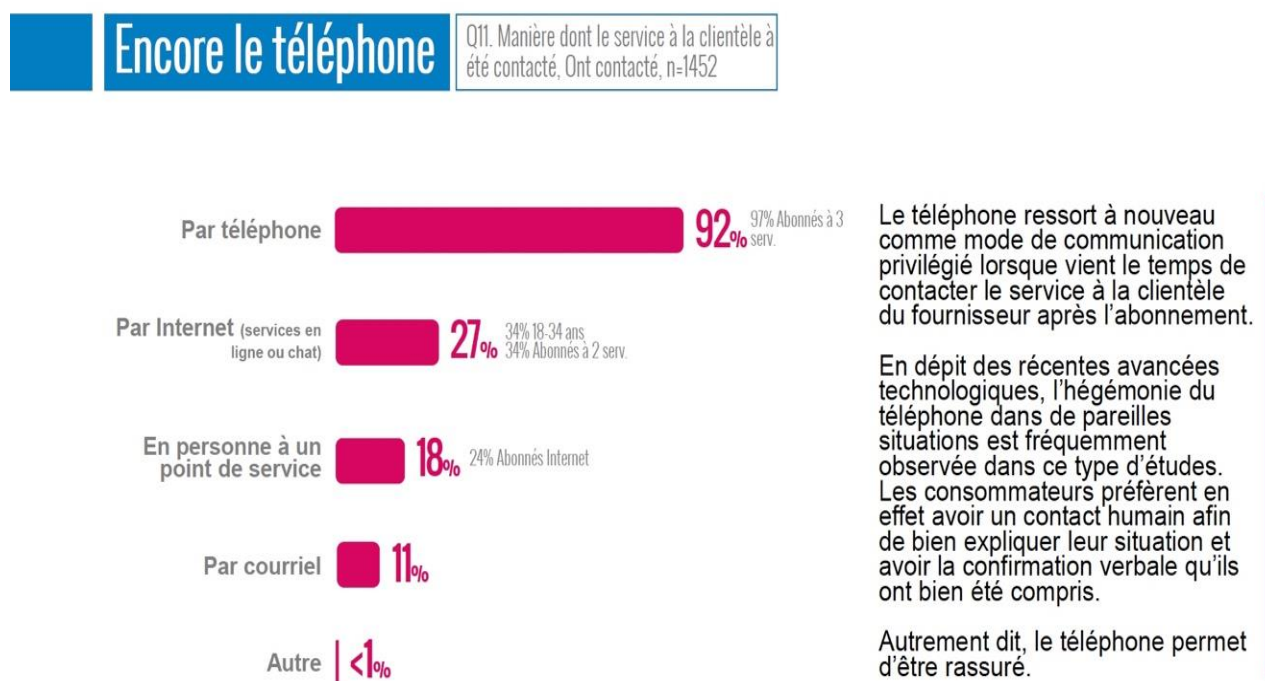


Figure 6 – Substance Stratégies survey, December 2017

Despite this preference, which may be partly due to deep-rooted habits, our survey shows that consumers' satisfaction level with the quality of customer service is relatively the same, regardless of the mode of communication chosen to contact the service.

³⁰ ACCENTURE, *Les consommateurs français attendent plus de contact humain dans leurs relations avec les marques, selon l'étude d'Accenture Strategy*, June 6, 2016. <https://www.accenture.com/fr-fr/company-news-release-accenture-global-consumer-pulse-research-2016>

2.1.3 Some Irritants

In addition to confirming consumers' preference for personalized contact, ideally by phone, several surveys reported consumers' main sources of irritation regarding customer service.

In 2017, a survey conducted by the firm J.D. Power³¹ for Canadian Wireless Customer Care Study among 5,500 Canadians subscribed to a wireless service clearly shows that what consumers are primarily looking for when having to use customer service is courtesy, feeling that their problem is being taken seriously, and that the customer service rep has the required knowledge to solve the problem.

In 2014, the UK organization WHICH? published the results of a survey on the most irritating aspects of telephone customer service. Given the desire to be given attention, which is the customer's priority, one can more easily understand how the irritants that are mentioned may bother a consumer wishing to resolve a problem or obtain an answer to a simple question.

Here is a list of the worst irritants according to UK consumers:

- Automated phone systems;
- Long wait times;
- Being transferred to different customer service reps;
- Trying to sell the caller unwanted products;
- Hold music;
- Standard responses to specific problems;
- Lack of knowledge about products or services.³²

A survey conducted by Consumer Reports among American consumers in 2015 reached similar results³³: hard time getting a live person on the line, condescending language, line being disconnected while caller is on hold, endless menu options, and the difficulty in getting to speak with a supervisor are among the main irritants.

Our survey also covers several of the above complaints; the major sources of dissatisfaction namely pertain to response and wait times, and of being able to speak with a supervisor in the event of a problem. Contrary to the U.S. survey, it would appear that the helpfulness and attentiveness of customer service reps are barely an irritant for respondents.

³¹ J.D. POWER, *Representative Behaviours Key to Delighting Wireless Customers*, J.D. Power Finds, April 27, 2017. <http://www.jdpower.com/press-releases/jd-power-2017-canadian-wireless-customer-care-study>

³² WHICH? *Don't have a nice day! Your customer service gripes*, September 2014.

<https://conversation.which.co.uk/home-energy/best-brands-customer-service-phone-telephone/>

³³ CONSUMER REPORTS, *'Your Call Is Important To Us' The problem with customer service*, July 29, 2015 <https://www.consumerreports.org/cro/magazine/2015/07/the-problem-with-customer-service/index.htm>

Satisfaction assessment based on certain aspects

Plusieurs dimensions, plusieurs écarts

Q18. Évaluation de dimensions du service à la clientèle, Ont contacté, n=1452



De manière générale, les dimensions plus inhérentes aux préposés recueillent de meilleurs scores que celles de nature plus corporative ou technologique.

Cela dit, il semble exister une certaine frustration quant à la difficulté de «transfert vertical». En fait, la frustration semble davantage technologique qu'humaine.

Q18. Et de manière plus spécifique, dans quelle mesure êtes-vous satisfait du service à la clientèle de votre fournisseur en ce qui concerne les aspects suivants?

substance strategies

19

Figure 7 – Substance Stratégies survey, December 2017

Wait times

As the telephone remains the preferred method for contacting customer service, the wait time before speaking with a representative is a major factor in consumers' perception of their experience and, as a result, of their assessment of customer service.

What is more, consumers' expectations towards companies change quickly. Not only are consumers increasingly more demanding, but, because of the speed of new means of communication, they are increasingly more impatient. Competence and efficiency have now also become part of the essential requirements of customer service.

However, consumers in many countries deplore the fact of always having a hard time reaching customer service and, once they do reach it, they feel rushed by customer service personnel. This perception may be associated with the fact that some companies restrict the time that customer service reps can spend on each call.

In 2007, ICMI, a company specialized in customer service, examined consumers' tolerance regarding the required wait time before reaching a representative. Based on three surveys conducted in the U.S. between 2014 and 2017, ICMI concluded that consumers' expectations in this respect did not correspond to reality.³⁴ What did the survey respondents have to say?

- The maximum time that a U.S. consumer is willing to wait is 13 minutes;
- Close to two-thirds of respondents believed that waiting more than two minutes was too much;
- 13% of respondents believe that there should be no wait time at all;
- About 15% of respondents stated that they would simply not call customer service, since they were convinced that the wait time would be too long.

In 2015, Consumer Reports had also surveyed consumers regarding customer service. The survey showed that 57% of the survey respondents had hung up, in frustration, before finding a solution to their problem, 50% had already aborted a purchase because of poor customer service, and 75% said they were very irritated if they were made to wait for more than a reasonable period of time.³⁵

Our survey clearly indicates that wait time is a major issue for consumers; respondents then indicated that this is the aspect of customer service that should be improved first.

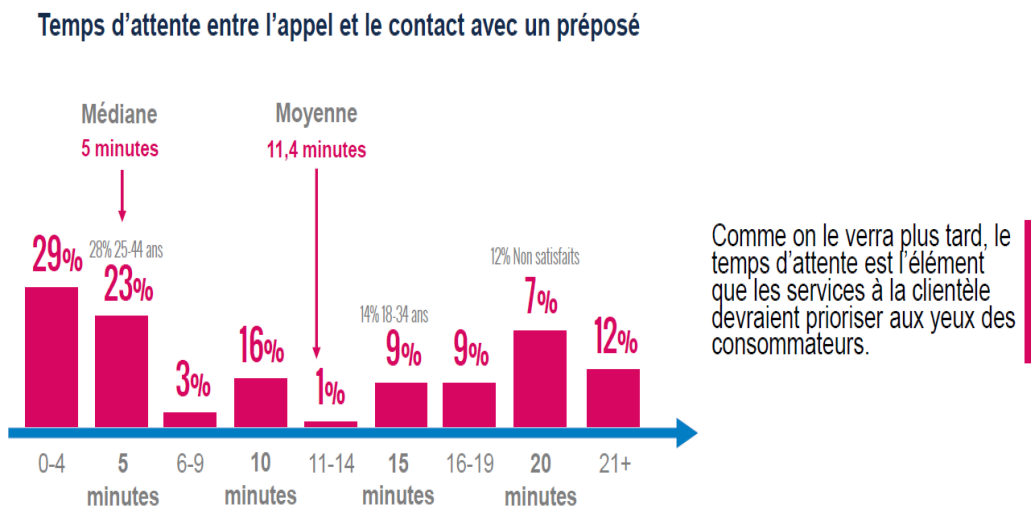
³⁴ *Ibid.*

³⁵ Doug VINSON, *What Do Customers Really Think About Long Wait Times?*, March 20, 2017.

<https://www.icmi.com/Resources/Customer-Experience/2017/03/What-Do-Customers-Really-Think-About-Long-Wait-Times>

Wait times between the call and contact with a customer service representative

Beaucoup de volatilité Q20. Temps d'attente estimé au téléphone lors du contact du service à la clientèle, Ont contacté par téléphone, n=1343



Q20. Lorsque vous communiquez avec le service à la clientèle de votre fournisseur principal par téléphone, environ combien de temps s'écoule-t-il habituellement avant que vous puissiez parler à un préposé?

substance strategies | 24

Figure 8 – Substance Stratégies survey, December 2017

2.1.4 Numerous Complaints to the CCTS

Though the various surveys present a relatively positive profile of customer service here and elsewhere, they only provide a very partial view of the situation. It is important to also cover the complaints received by the CCTS, namely, the mediation service that has to handle the problems which customer service was unable to resolve.

In its last Mid-Year Report, the CCTS received 2,163 complaints associated directly with the provision of customer service. They account for 29.6% of the complaints received that it cannot investigate because they are “out of mandate.”³⁶

The following graph, taken from the Annual Report 2016-17, indicates that many complaints part of the CCTS’s mandate still indirectly pertain to providers’ customer service and are of interest to this study. In fact, consumers must first communicate with their service provider through its customer service before contacting the CCTS. The CCTS can only accept their complaint if they are not satisfied with the resolution proposed by the provider or if their problem is simply not resolved.

³⁶ CCTS, Codes, Stats & Reports. <https://www.ccts-cprst.ca/codes-stats-and-reports/ccts-reports/annual-and-mid-year-reports/>. See, in particular, Mid-year Reports 2016-2017 and 2017-2018.

The CCTS³⁷ states that complaints that are not resolved by customer service and are brought before mediation services mainly involve billing (including increases in and unexpected charges), contract interpretation and cancellation, and technical problems.

Services with the most complaints in Canada

Sommaire des principaux sujets de plaintes

TABLEAU 1 : SOMMAIRE DES PRINCIPAUX PROBLÈMES

| | facturation | dispute contractuelle | prestation de services | gestion du crédit | total |
|-----------------------------|--------------|-----------------------|------------------------|-------------------|---------------|
| sans fil | 3 826 | 2 907 | 1 368 | 442 | 8 543 |
| internet | 2 156 | 2 009 | 1 454 | 144 | 5 763 |
| téléphonie locale | 1 356 | 1 491 | 815 | 104 | 3 766 |
| interurbains | 204 | 79 | 80 | 5 | 368 |
| assistance-annuaire | 6 | 1 | – | – | 7 |
| assistance téléphonique | 1 | – | – | – | 1 |
| annuaire des pages blanches | – | – | – | – | – |
| TOTAL | 7 549 | 6 487 | 3 717 | 695 | 18 448 |

TABLEAU 2 : SECTEURS D'ACTIVITÉS

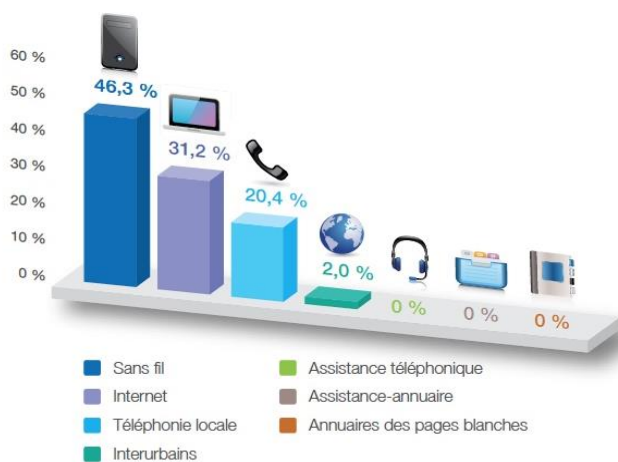
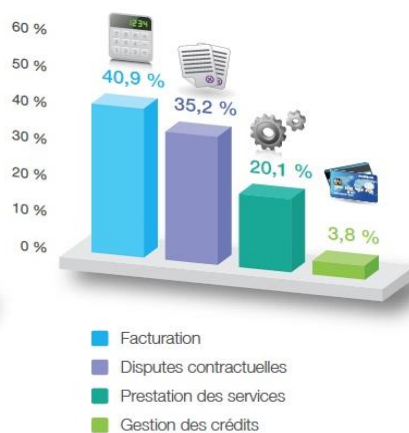


TABLEAU 3 : PRINCIPAUX PROBLÈMES



Veuillez noter que les pourcentages dans les tableaux du rapport peuvent ne pas totaliser 100 % en raison des arrondissements.

Figure 9 – CCTS – Annual Report 2016-2017

Given their huge growth, it is not surprising to see that the services most affected by complaints received by the various mediation services and consumer associations, regardless of origin, involve wireless and the Internet. The CCTS states in its Annual Report 2016-17 that wireless services are the leading complaint (46.3%), followed by the Internet (31.3%). Together, these

³⁷ CCTS, *Annual Report 2016-17*. <https://www.ctcs-cprst.ca/wp-content/uploads/2017/11/CCTS-Annual-Report-2016-2017.pdf>

two services account for 77.6% of complaints. The CCTS has noted an 8% increase in complaints for wireless compared to the previous year, and 38% for the Internet³⁸.

However, such a difference is not found between the various services when consumers are asked about their level of satisfaction with customer service.

Assessment of customer service by service provided

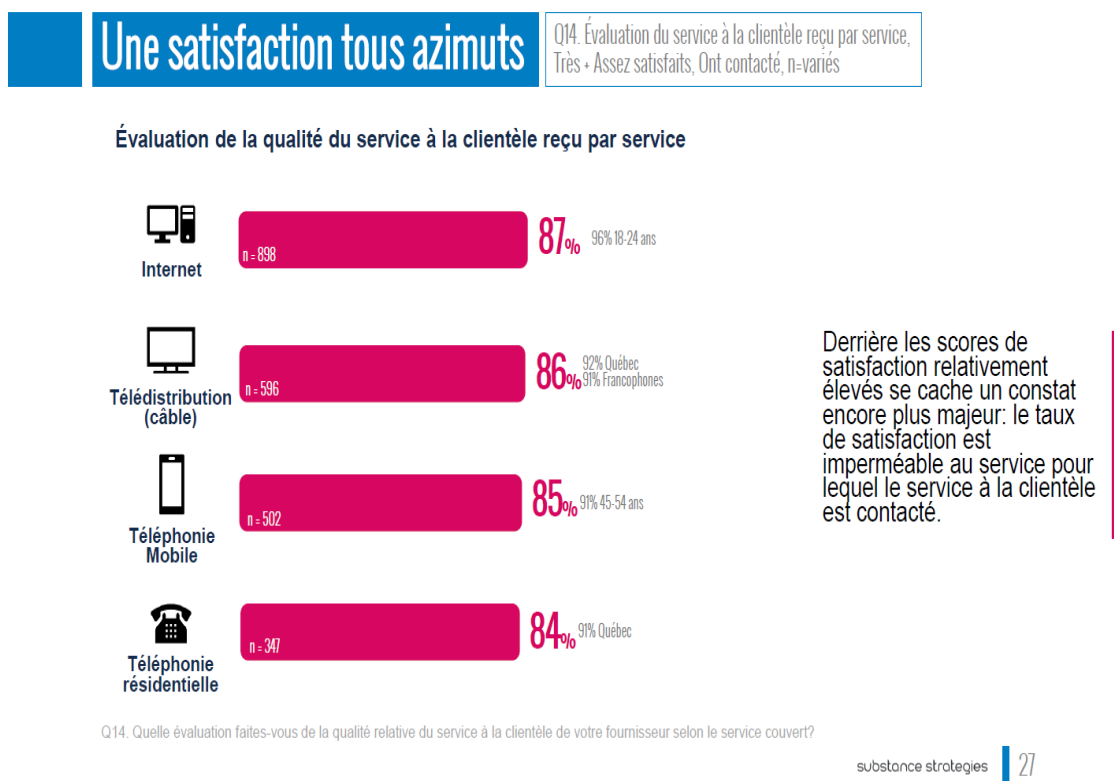
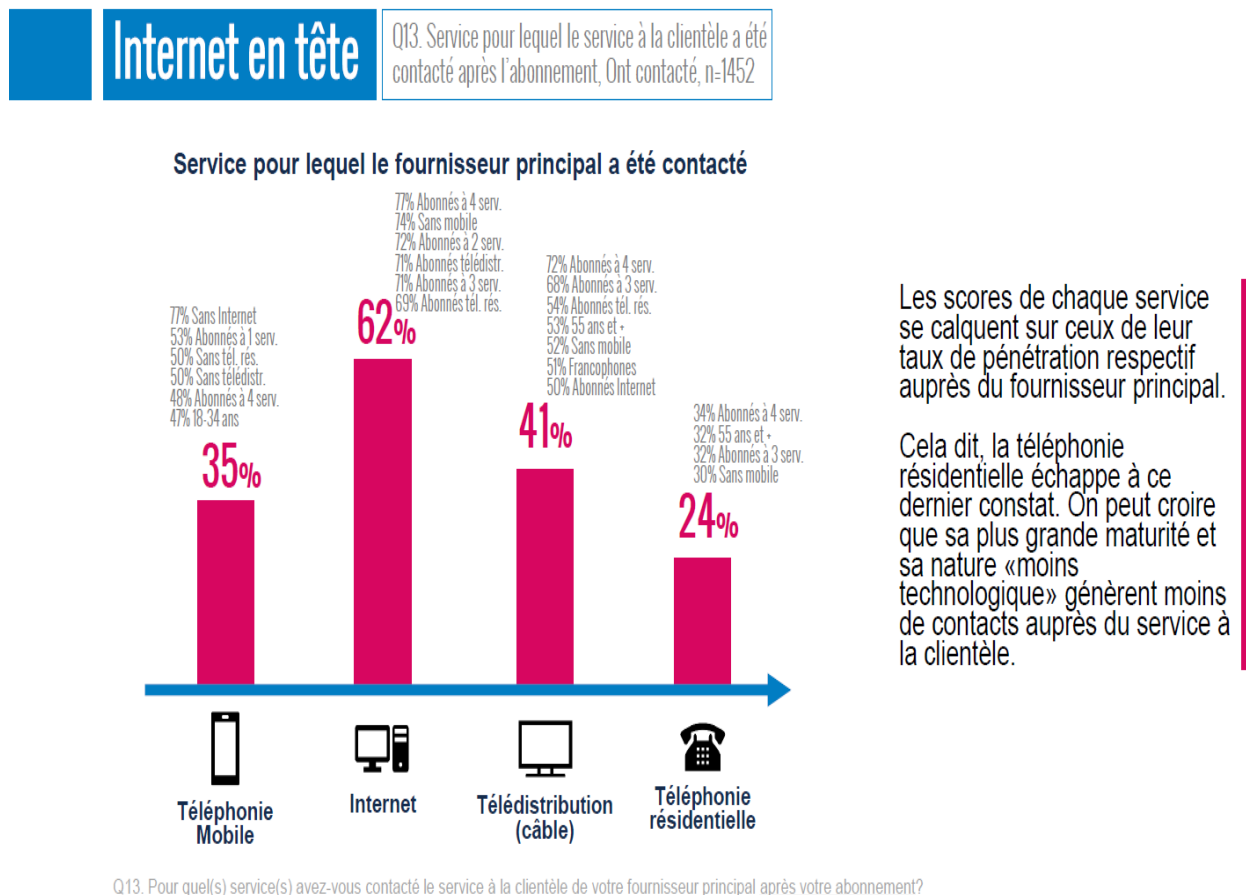


Figure 10 – Substance Stratégies survey, December 2017

However, the proportion of contacts with customer service during the subscription period are not similarly balanced and also do not reflect the proportion of complaints received by the CCTS for the various services.

³⁸ CCTS, Annual Report 2016-2017. <https://www.ccts-cprst.ca/wp-content/uploads/2017/11/CCTS-Annual-Report-2016-2017.pdf>

Service where customer service was contacted after subscribing



substance strategies | 26

Figure 11 – Substance Stratégies survey, December 2017

2.1.5 Customer Service – Behind the Scenes

Although consumers are sometimes dissatisfied with how they are treated by their provider's customer service representatives and the latter's' attitude, a look at the working conditions of customer service employees may, without justifying it, at least partly explain their attitude.³⁹

In Quebec, Julie Cloutier and Denis Harrison from Université du Québec à Montréal conducted a study in 2012 among customer service representatives in three of the largest telecommunications and cable distribution company call centres in Quebec.⁴⁰

³⁹ Claude GAUVREAU, *Surveiller et punir*, Actualités UQAM, February 5, 2014.

<https://www.actualites.uqam.ca/2014/detresse-psychologique-dans-les-centres-dappel-au-quebec>

⁴⁰ CLOUTIER, Julie and D. HARRISON *Les conditions de travail dans les centres d'appels: les personnes syndiquées du SCFP au Québec*, Rapport 3, Résultats, September 2012

[https://sac.uqam.ca/upload/files/publications/syndicat/2012/Harrison.%20D..%20Cloutier.%20J.%20et%20V.%20B%20C3%A9land-Quellette.%20\(2012\).%20Les%20conditions%20de%20travail%20..RAPPORT%203.pdf](https://sac.uqam.ca/upload/files/publications/syndicat/2012/Harrison.%20D..%20Cloutier.%20J.%20et%20V.%20B%20C3%A9land-Quellette.%20(2012).%20Les%20conditions%20de%20travail%20..RAPPORT%203.pdf)

The study conducted by the two researchers revealed that the work environment in such call centres is such that more than half the 659 respondents stated having experienced episodes of psychological distress. There appear to be two factors that account for the situation: the workload and close supervision. In some call centres, up to three supervisors are constantly monitoring employees: the first to make sure they follow the script to the letter, the second to monitor the duration of the calls, and the third to check the time elapsed between each call and to obtain explanations if this time is considered too long. As a result, the staff [TRANSLATION] “had higher levels of stress and anxiety, and a greater risk of experiencing depression.”⁴¹

Although the survey dates back to 2012, the findings appear to still apply today; based on recent revelations by employees of major Canadian service providers reported on CBC in the fall of 2017,⁴² the situation has not changed. Note, moreover, that these troubling reports on the sales practices of some service providers and on the work environment found at certain call centres are likely why the federal government decided to ask the CRTC in June 2018 to produce a report on harmful sales practices which Canadian consumers may be exposed to⁴³.

2.2 LITTLE MONITORING BY THE CRTC

The respondents to our survey are divided when asked whether customer service in the telecom industry is regulated. There is a much clearer majority when those who do not believe customer service is regulated are asked whether it should be.

⁴¹ *Ibid.*

⁴² Erica JOHNSON, *Bell customers, employees flood CBC with complaints about high-pressure sales*, CBC, November 20, 2017. <http://www.cbc.ca/news/business/bell-high-pressure-sales-reaction-1.4413187>

Erica JOHNSON, *Bell insider reveals high-pressure sales tactics required on every single call*, CBC, November 19, 2017. <http://www.cbc.ca/news/business/bell-whistleblower-reveals-high-pressure-sales-1.4404088>

⁴³ GOVERNMENT OF CANADA, *Order in Council concerning high-pressure telecommunications sales practices*, June 14, 2018. <https://www.canada.ca/en/innovation-science-economic-development/news/2018/06/order-in-council-concerning-high-pressure-telecommunications-sales-practices.html>

Is the customer service of telecom service providers regulated?

Une confusion manifeste

Q34-35. Existence de lois ou règlements, Total, n=1540

Les services à la clientèle sont-ils légiférés ou réglementés?

n = 1540

49%

Oui

58% Très satisfaits
57% 18-24 ans
55% Education secondaire

51%

Non

68% Non satisfaits
56% 45-54 ans



Devraient-ils l'être?

n = 789

68%

Oui

80% Pas du tout satisfaits
73% 55-64 ans
73% Education collégiale

32%

Non

40% 25-34 ans
40% Education secondaire
39% Ouest
39% Très satisfaits
37% Hommes

La population canadienne se montre très incertaine quant à l'existence ou non de lois ou de réglementations encadrant les services à la clientèle des compagnies de télécommunications.

Cela dit, ceux qui estiment que de telles lois ou réglementations n'existent pas à l'heure actuelle sont majoritairement d'avis que les services à la clientèle devraient faire l'objet d'un tel encadrement.

Q34. À votre connaissance, les services à la clientèle des fournisseurs de services sont-ils encadrés par la loi ou les règlements?
Q35. À votre avis, les services à la clientèle des fournisseurs de services devraient-ils être encadrés par des lois ou des règlements?

substance strategies | 39

Figure 12 – Substance Stratégies survey, December 2017

However, there is no consensus among respondents as to the aspects that should be regulated: there are some elements at the top of the list, such as compensation for delays in resolving problems and the obligation to comply with certain minimal standards, for which regulations exist in other jurisdictions.

Problematic aspects that only regulation can resolve

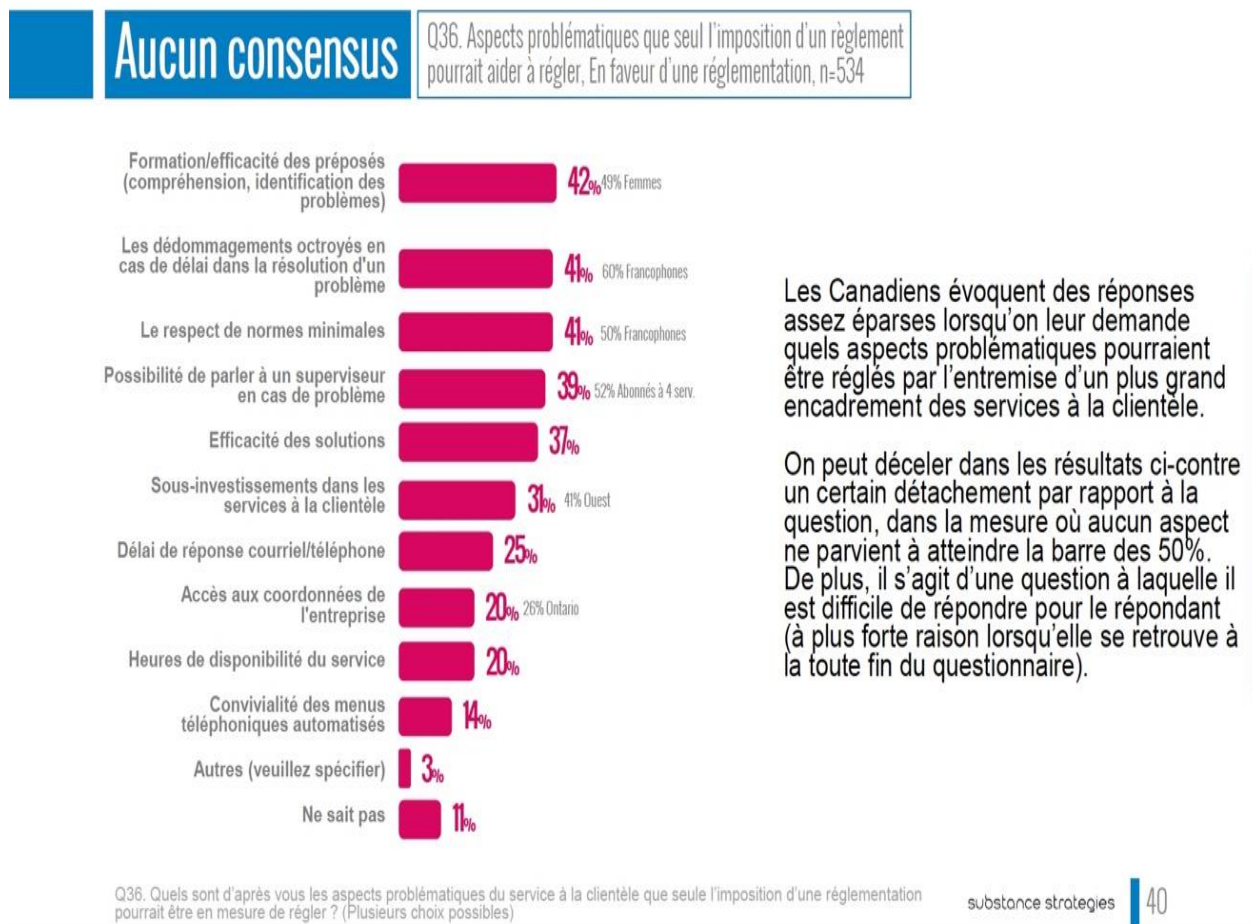


Figure 13 – Substance Stratégies survey, December 2017

What is the situation regarding the current regulation of telecommunications providers' customer service in Canada?

In Canada, the Canadian Radio-television and Telecommunications Commission⁴⁴ (CRTC) is the body that primarily regulates telecommunications and broadcasting. The CRTC set up and defined the mandate of the CCTS and established the Codes which communication service providers must comply with.

These Codes stipulate obligations to inform consumers – which should logically be met by the service providers' customer service – but unfortunately do not directly cover the service providers' customer service, other than to require the latter to indicate on the contract how customer service can be contacted.⁴⁵

⁴⁴ Canadian Radio-television and Telecommunications Commission (CRTC). <https://crtc.gc.ca/eng/home-accueil.htm>

⁴⁵ CRTC, The Wireless Code, simplified, Section B(1)(ii)(m)(v), for a postpaid contract for wireless services; CRTC, The Television Service Provider Code, simplified, Section VII(m)(v), for a fixed-term cable television contract.

In fact, we noted that the CRTC rarely covers the quality of the providers' customer service, and instead limits itself to stipulating certain obligations regarding the accessibility of customer service in the providers' terms of service or in regulatory policies applicable to everyone. Here is in fact an example of the current obligations in this respect:

- *Where customer service functions on websites are not accessible, persons with disabilities must not incur a charge or otherwise be disadvantaged if they use an alternate channel of customer service to access those functions. TSPs are to make accessible any customer service functions that are available solely over the service providers' websites.*
- *TSPs are to make their general call centres accessible to the point of providing a reasonable accommodation to persons with disabilities by (a) training customer service representatives in handling enquiries from persons with disabilities, and familiarizing them with the service providers' products and services for persons with disabilities, and (b) making Interactive Voice Response systems accessible. A service provider with a disability call centre could meet this requirement by developing and implementing protocols for the appropriate transfer of calls to the call centre.⁴⁶*

Lastly, note that although telecommunications are essentially federally regulated, provincial regulatory authorities can intervene when certain disputes reveal breaches to their own regulations. As the Office de la protection du consommateur mentioned:

[TRANSLATION] Customer service employees are representatives of the company and as such, they must ensure that the company observes the law, in particular the Consumer Protection Act and the Act Respecting the Collection of Certain Debts. For instance, they must not make any false or misleading representations, fail to mention an important fact, charge a higher price than that advertised, etc.

As can be seen, none of the main concerns mentioned by the respondents to our survey would therefore be directly covered by provincial legislation.

⁴⁶ CRTC, Appendix to Telecom Regulatory Policy CRTC 2017-11

3. REGULATIONS AND CONSUMER PROTECTION IN OTHER COUNTRIES

Several countries have adopted policies to regulate telecom companies and ensure adequate protection for consumers. However, customer service is rarely covered by such protection.

The policies and codes that have been established are regulated by the government itself, depending on the country, or by organizations set up for this purpose. We will present a quick overview of these authorities in charge of drawing up the regulations, as well as the rules they have established in four foreign jurisdictions, i.e. the United Kingdom, Australia, the United States and France.

We will also cover the customer service standards developed by the International Organization for Standardization (ISO).

3.1 NATIONAL FRAMEWORKS

3.1.1 United Kingdom

The Office of Communication⁴⁷ (Ofcom) in the UK is a regulatory authority similar to the regulatory bodies found in Europe, including ARCEP. Ofcom's statutes give it wider powers, up to the application, if needed, of corrective measures to markets if it believes that the dominant operators have undue influence on the competition that could impact consumers.

Even if the level of satisfaction with respect to the quality of telecommunication services is generally high in the UK, customer service is still all too often unable to resolve consumer disputes within a reasonable period of time. Ofcom thus deemed it necessary to set up regulatory measures for customer service in 2017 to incite companies to improve their practices and mitigate consumer frustration.⁴⁸ Ofcom is basically requiring telecom providers to automatically compensate consumers if they are unable to respond within the required times, such as if repairs are not done within a reasonable period of time, a company promises to provide a service by a specific date but does not do so, or a technician misses an appointment that was previously scheduled with the consumer.

This measure, which currently applies to landline phone and Internet services, was implemented because Ofcom noticed that consumers count on telecom services to make their lives easier and that they are increasingly considering them to be an essential service. To establish the new policy, Ofcom used as a model the compensation also provided in the UK when electricity or water supply is cut.

By implementing the compensation system, which Ofcom considers minimal, the regulatory authority hopes that in a newly competitive environment, service providers will likely increase their basic compensation so as to attract more consumers and encourage them to subscribe to their services.

⁴⁷ OFFICE OF COMMUNICATION (Ofcom). <https://www.ofcom.org.uk/home>

⁴⁸ Ofcom, *Automatic compensation for broadband and landline users*, November 10, 2017. <https://www.ofcom.org.uk/about-ofcom/latest/media/media-releases/2017/automatic-compensation>

Ofcom, recognizing how quickly the telecom world is changing, naturally reserves the right, if supported by new studies, to adjust the compensation and even broaden the scope of the measure.

3.1.2 Australia

When it was created in 2005, the Australian Communication and Media Authority⁴⁹ (ACMA) set an ambitious objective “To be, and to be recognised as, a world-leading, best practice converged communications regulator.”⁵⁰ The authority’s mandate and responsibilities involve the regulation of television and broadcasting, telecommunications, Internet and radio communications. With respect to telecommunications, ACMA is namely responsible for drawing up and enforcing industry standards.⁵¹

In 2007, Communications Alliance, an organization created to give the industry a unified voice, adopted the Telecommunications Consumer Protections Code (TCP Code), which was revised and registered in 2012 by ACMA.⁵² Though several authorities around the world, including the authority in Canada, apply specific codes to regulate various communication services (landline telephony, wireless, Internet), it is less common, as was done in Australia, to set up a code related to consumer protection for all these services.

The main objectives of the TCP Code consist in ensuring that consumers are able to have fair relations with their telecom services provider before, during and even after a contract is signed, and that: disputes can be resolved quickly; disadvantaged and vulnerable consumers can be assisted and protected; service providers set up internal monitoring tools to ensure compliance with the Code. This would make sure that the code is comprehensive and implements minimum standards for all aspects of service provider-consumer relations: advertising; relations at point of sales; billing; payments; and complaints handling.

The Code thus contains certain obligations that directly concern customer service and complaints handling: the service provider must indicate the various ways, and the times, it can be contacted. The service provider must also indicate the average wait time for accessing its customer service, the first-contact problem resolution rate, and any measures it has implemented to improve said rate.

When handling a complaint, the service provider is required to clearly indicate to consumers the response time for each stage of the process. If the response time cannot be observed, the service provider must, before the time has elapsed, notify the consumer, indicate the reason why, and provide a new response time.

The Code further stipulates that the service provider must ensure that its customer service staff be courteous at all times and have the necessary training to respond to consumers clearly and precisely. The service provider must promote a corporate culture that condemns all forms of

⁴⁹ Australian Communication and Media Authority (ACMA). <https://www.acma.gov.au/>

⁵⁰ ACMA, *The ACMA’s strategic intent*. <https://www.acma.gov.au/theACMA/About/Corporate/Authority/role-of-the-acma>

⁵¹ ACMA, *Register of codes*. <https://www.acma.gov.au/Home/theACMA/Library/Corporate-library/Forms-and-registers/register-of-codes>

⁵² COMMUNICATIONS ALLIANCE, *Telecommunications Consumer Protections Code*, 2012. <https://www.telstra.com.au/content/dam/tcom/personal/consumer-advice/pdf/consumer/telecommunications-consumer-protections-code.pdf>

inappropriate relations with consumers, including the communication of incorrect information and stringent disciplinary measures in case of non-compliance with this policy.

The service provider must also give consumers, including and especially those with specific limitations (in particular those who do not have a good command of English), with all the support needed so that they can lodge their complaint and follow up on it. Lastly, a service provider may in no case cancel telecom services because it did not succeed in resolving a complaint internally. The service provider must also make sure that consumers may at any time, if they so wish, appoint a representative to act on their behalf.

If a resolution cannot be reached, or if the resolution being proposed by the company does not satisfy the consumer, the service provider will naturally have to specify to the consumer how to contact the Ombudsman.

Lastly, the service provider must set up ways to regularly assess the performance of its customer service and, when systemic problems are identified, take the measures needed to resolve them. It must keep a complaints register that includes the name of the consumer, what the complaint consists of, the measures taken to respond to it, and the results obtained. These records must be available for referral for two years. Every three months, the complaints that are received must be categorized and analyzed in order to identify recurring problems and record the steps taken to correct them.

In March 2018, the ACMA filed proposals for new mandatory rules on complaints handling: the Telecommunications (Consumer Complaints Handling) Industry Standard 2018 (Complaints-handling Standard) and the Telecommunications (Consumer Complaints) Record-Keeping Rules (RKR), adapted to the migration of users to the National Broadband Network – NBN.⁵³

The Complaints-handling Standard is based on the TCP Code; the changes stipulate certain rules and increase the enforceability of the measures.

These would include a requirement that providers make complaint handling processes available to consumers as soon as practicable after the consumer informs the operator they wish to make a complaint and advise consumers of any delay in proposed time frames for managing a complaint as soon as possible.

The new standard would also specify five-working-day deadlines for informing consumers about alternative dispute resolution or internal complaint escalation processes if they complain about response times, as well as informing customers of a decision not to deal with a complaint due to a determination that the complaint is frivolous, vexatious or out of the provider's hands.⁵⁴

The RKR require service providers to compile and report to the authority data on consumer complaints, and in so doing increase the requirements regarding transparency and accountability. The data are made public by the ACMA to help consumers make more informed decisions.

⁵³ ACMA, *NBN migration: complaints-handling rules*. <https://www.acma.gov.au/theACMA/nbn-migration-complaints-handling-rules>

⁵⁴ Dylan BUSHHELL-EMBLING, ACMA consulting on telco complaint handling rules, Technology decisions, March 15, 2018. <https://www.technologydecisions.com.au/content/networking/article/acma-consulting-on-telco-complaint-handling-rules-1144710060>

Meanwhile, the proposed record-keeping rules would require providers to report complaints data to ACMA on a quarterly basis, compiled from records operators are already required to keep under the current Telecommunications Consumer Protection Code.

Telcos would be required to report information including the total number of complaints, the proportion resolved at first contact and the proportion escalated to the Telecommunications Industry Ombudsman.⁵⁵

According to the Australian Communications Consumer Action Network (ACCAN), the *Guidelines for complaint management in organizations* (AS/NZS 10002:2014⁵⁶) should serve as a basis for establishing new rules on complaints handling.⁵⁷ ACCAN also believes that all service providers should be subject to the RKR, that all complaints should be reported, that inappropriate sales techniques should be included in the reported complaints topics, that the total number of complaints received and of complaints resolved should be provided, and that additional details should also be required as to how each complaint was resolved.⁵⁸

In 2011, the Australian government also adopted the Telecommunications (Customer Service Guarantee) Standard 2011⁵⁹ (replacing the one from 2000). This standard imposes certain rules regarding appointments for the installation or correction of any problems which consumers may have with service:

16 Making and changing appointments

(2) *The day, and the time of day, proposed by the carriage service provider for an appointment must be convenient for the customer.*

(3) *To comply with subsection (2), a carriage service provider may propose an appointment:*

(a) *for a particular time of day; or*

(b) *in the period between 2 particular times of day that are not more than 5 hours apart.*

(4) *Either party to an appointment may change the day, time of day or location of the appointment:*

(a) *By giving at least 24 hours notice of the change to the other party; or*

(b) *By obtaining the agreement of the other party to the change.*

(5) *A carriage service provider must keep an appointment to which the carriage service provider is a party.*

⁵⁵ Ibid.

⁵⁶ The *Guidelines for complaint management in organizations* (AS/NZS 10002:2014), drawn up by the Joint Standards Australia/Standards New Zealand Committee QR-015, Complaint Handling is an adaptation of the ISO standard *Customer satisfaction – Guidelines for complaints handling in organizations* (ISO 10002:2004, MOD). Available at: <https://infostore.saiglobal.com/en-us/standards/as-nzs-10002-2014-1764518/>. We will be briefly covering ISO 10002:2004 in a later section.

⁵⁷ AUSTRALIAN COMMUNICATIONS CONSUMER ACTION NETWORK, *New ACMA Consumer Protection Rules*, May 11, 2018. <http://accan.org.au/our-work/submissions/1503-acma-complaints-handling-standard-and-record-keeping-rules>

⁵⁸ Ibid.

⁵⁹ AUSTRALIAN GOVERNMENT, *Telecommunications (Customer Service Guarantee) Standard 2011* <https://www.legislation.gov.au/Details/F2011C00791>

The standard also states that the appointment will be considered as having taken place if the service provider comes to the appointment location no later than 15 minutes after the determined time. Non-compliance with these rules constitutes a contravention and the service provider is then required to compensate the consumer.⁶⁰

3.1.3 United States

In the U.S., the Federal Communication Commission⁶¹ (FCC) has been the federal telecommunications authority since 1934. However, it partly shares the various areas of expertise with the states.

In addition to the actual communication services, the FCC is equally interested in the quality of the equipment provided by manufacturers, the handling of consumer complaints, and the content of the advertisements on the services provided by telecom companies.

Its Consumer Division investigates potential fraudulent or deceptive practices likely to violate consumers' rights. It has also set up a system where consumers may, without making an official complaint, report problems encountered with a service provider. This information enables the Division to determine trends in the various problems encountered by consumers.

The Consumer Inquiries and Complaints Division handles disputes related to billing and contracts, among other matters, which most often is the role of mediation organizations.

In 1993, the FCC established strict rules to oversee customer service in the cable television sector. Among the obligations which service providers are required to comply with under the Customer Service Standards⁶² (47 CFR 76.309), several directly pertain to issues which were part of consumers' complaints.

Cable operators are namely required to maintain telephone access to customer service 24 hours a day, seven days a week. During regular business hours, company representatives must be available to respond to customer requests. After regular business hours, which must include at least one evening and a few hours on the weekend, the operator may use a telephone answering service or a system that can record messages. A qualified representative of the operator must then return the call the next day.

The cable operator must respond to calls within 30 seconds following the connection. If the call must be transferred, the transfer time must not exceed 30 seconds. These standards must be observed at least 90% of the time. For calls made by consumers, lines must not be unavailable, as a result of being busy, more than 3% of the time.

Technicians must begin work that requires an interruption in service no later than 24 hours following the notification; the FCC considers the loss of audio or video on one or more channels as an interruption in service. Work must begin no later than the business day following the notification of any other type of problem. Technicians may schedule an appointment at a specific time or within a four-hour block. If the technician is delayed or is unable to make the

⁶⁰ *Idem*, Schedule 2 – Categories of contravention of performance standards and damages (section 29)

⁶¹ FEDERAL COMMUNICATION COMMISSION (FCC). <https://www.fcc.gov/>

⁶² FCC, *Customer Service Standards*. <https://www.fcc.gov/media/customer-service-standards#block-menu-block-4>. See 47 CFR 76.309 at [https://www.in.gov/iurc/files/47CFR76309\(1\).pdf](https://www.in.gov/iurc/files/47CFR76309(1).pdf)

appointment, he must notify the consumer, who may schedule a new appointment at his convenience. The required rate of compliance with these rules is 95%.

3.1.4 France

The *Autorité de régulation des communications électroniques et des postes*⁶³ (ARCEP), an independent administrative body that is accountable to the government, was set up in France in 1997 when the telecommunications industry was deregulated. ARCEP's mandate is broad and includes both market studies and defining the general obligations of operators.

ARCEP is not responsible for the resolution of disputes between users and operators, which are handled by the electronic communications mediator or, in case of any breaches to the consumer code, by the *Direction générale de la concurrence, de la consommation et de la répression des fraudes* (DGCCRF), which is in charge of ensuring compliance with consumer law.

However, to still keep up to date on the problems faced by consumers, and because services change quickly over time, ARCEP created a Web platform⁶⁴ that enables consumers to report deficiencies as soon as they occur, for both landline and mobile phone services and the Internet. The Web platform thus enables ARCEP to identify, virtually in real time, the problems which consumers encounter, and quantify the deficiencies so that it can better target its action among operators. ARCEP can thus respond quickly, identify problems and suggest possible solutions to legislators and companies. It posts monthly reports on its Web platform that identify the main problems that were reported.

ARCEP is regularly consulted by the French government when drawing up draft bills, standards or decrees related to telecommunications. All the notices issued by the authority are public and published. ARCEP also has the power to impose sanctions on companies that do not comply with their licence-related obligations.

ARCEP conducts yearly investigations aimed at assessing the quality of mobile services in metropolitan France and network operator compliance with licensing requirements. The report related to these investigations is also made public and allows consumers to remain informed of the quality of service providers' services as well as of breaches in their obligations.

Since June 2010, operators with over 100,000 land-line subscribers were required to regularly publish various quality indicators on their website: initial connection time, rate of reported outages, expected repair time when there is equipment failure; the response time which a consumer calling customer service has a right to expect, complaints received regarding billing problems, and single-call resolution rate of complaints made to customer services.

However, since 2017, follow-ups were no longer being done of the two response time indicators by operators' customer service.⁶⁵

⁶³ AUTORITE DE REGULATION DES COMMUNICATIONS ELECTRONIQUES ET DES POSTES (ARCEP). <https://www.arcep.fr/index.php?id=1>

⁶⁴ ARCEP, *J'alerte l'ARCEP*. <https://jalerte.arcep.fr/home>

⁶⁵ ARCEP, *Qualité du service client des opérateurs*, October 2017.

https://www.arcep.fr/uploads/tx_gspublication/rapport-qualite-service-client-S1_2017.pdf

3.2 OTHER STANDARDS

The International Organization for Standardization (ISO) has established three standards related to customer service. These standards, which cannot involve certification, outline principles and give companies, regardless of their industry, a framework for creating optimal customer service “for enhanced customer satisfaction.”

The three standards are ISO 10001:2007, which covers codes of conduct for organizations, ISO 10002:2014, which deals with complaints handling, and ISO 10003:2007, which covers dispute resolution. We are presenting excerpts that show how these various “Quality management – Customer satisfaction” standards are presented by the organization, along with our brief commentary.

ISO 10001:2007⁶⁶ – Guidelines for codes of conduct for organizations

General

Maintaining a high level of customer satisfaction is a significant challenge for many organizations. One way of meeting this challenge is to put in place and use a customer satisfaction code of conduct. A customer satisfaction code of conduct consists of promises and related provisions that address issues such as product delivery, product returns, handling of personal information of customers, advertising and stipulations concerning particular attributes of a product or its performance [...]

This International Standard provides guidance to assist an organization in determining that its customer satisfaction code provisions meet customer needs and expectations, and that the customer satisfaction code is accurate and not misleading. Its use can:

- *enhance fair trade practices and customer confidence in an organization;*
- *improve customer understanding of what to expect from an organization in terms of its products and relations with customers, thereby reducing the likelihood of misunderstandings and complaints;*
- *potentially decrease the need for new regulations governing an organization's conduct towards its customers.*

[Our underlining]

The standard does not state what such a code consists of, but rather defines the guidelines that must be considered when drawing it up: Commitment, Capacity, Visibility, Accessibility, Responsiveness, Accuracy and Accountability.

A study conducted by Option consommateurs shows that the promises made by companies can be particularly vague and unverifiable (like those extolling the virtues of the company's customer approach or that state that customer satisfactory is their primary concern), which are clearly promotional (committed to providing outstanding products and services that meet consumers' wishes) or that resemble empty talk presented in the form of commitments (being clear, doing

⁶⁶ INTERNATIONAL ORGANIZATION FOR STANDARDIZATION (ISO), *ISO 10001:2007(en) Quality management — Customer satisfaction — Guidelines for codes of conduct for organizations*.
<https://www.iso.org/obp/ui/#iso:std:iso:10001:ed-1:v1:en>

everything possible to be helpful, etc.).⁶⁷ The same goes for the guarantees related to the training of customer service personnel, taking into consideration observations of the service in view of improving customer satisfaction, or the role of customer service in the organizational chart; in short, it is impossible to ascertain the existence or scope of such measures.

With respect to commitments regarding policies related to delivery, returns, use of personal information, advertising or product attributes and performance, it should go without saying that the company is liable towards consumers for its representations. In Canada, we fortunately have consumer protection legislation (and a Competition Act) that provide remedies in case of misrepresentations, whether merchants undertake to comply with such representations or not.

Interestingly, one of the objectives of the above standard is the strengthening of the bond of trust between the consumer and the company, which in itself should be serious incentive for a company to undertake to be transparent, aboveboard and competent and to observe them, but also to “potentially decrease the need for new regulations governing an organization’s conduct towards its customers.” Duly noted.

ISO 10002:2014⁶⁸ – Guidelines for complaints handling in organizations

General

This International Standard provides guidance for the design and implementation of an effective and efficient complaints-handling process for all types of commercial or non-commercial activities, including those related to electronic commerce. It is intended to benefit an organization and its customers, complainants, and other interested parties.

[...]

The handling of complaints through a process as described in this International Standard can enhance customer satisfaction. Encouraging customer feedback, including complaints if customers are not satisfied, can offer opportunities to maintain or enhance customer loyalty and approval, and improve domestic and international competitiveness.

Implementation of the process described in this International Standard can

- *provide a complainant with access to an open and responsive complaints-handling process,*
- *enhance the ability of the organization to resolve complaints in a consistent, systematic, and responsive manner, to the satisfaction of the complainant and the organization,*
- *enhance the ability of an organization to identify trends and eliminate causes of complaints, and improve the organization's operations,*
- *help an organization create a customer-focused approach to resolving complaints, and encourage personnel to improve their skills in working with customers, and*
- *provide a basis for continual review and analysis of the complaints-handling process, the resolution of complaints, and process improvements made.*

⁶⁷ OPTION CONSOMMATEURS (OC), *Avez-vous le bon numéro? Le service à la clientèle dans les entreprises de télécommunications*, June 2010. <https://option-consommateurs.org/wp-content/uploads/2017/07/pratiques-commerciales-service-clientele-telecom-2010.pdf>

⁶⁸ ISO, *ISO 10002:2014 – Quality management — Customer satisfaction — Guidelines for complaints handling in organizations*. <https://www.iso.org/obp/ui/#iso:std:iso:10002:ed-2:v1:fr>

[...]

1 Scope

This International Standard addresses the following aspects of complaints handling:

- a) enhancing customer satisfaction by creating a customer-focused environment that is open to feedback (including complaints), resolving any complaints received, and enhancing the organization's ability to improve its product and customer;*
- b) top management involvement and commitment through adequate acquisition and deployment of resources, including personnel training;*
- c) recognizing and addressing the needs and expectations of complainants;*
- d) providing complainants with an open, effective, and easy-to-use complaints process;*
- e) analysing and evaluating complaints in order to improve the product and customer service quality;*
- f) auditing of the complaints-handling process;*
- g) reviewing the effectiveness and efficiency of the complaints-handling process.*

[Our underlining]

ISO 10002:2014 thus provides guidance on planning, design, operation, updating and improvements to the internal complaints-handling process. The guidelines that must be considered are: Visibility, Accessibility, Responsiveness, Objectivity, Charges, Confidentiality, Customer-focused approach, Accountability, and Continual improvement.

In its research, Option consommateurs specifically examines the visibility and accessibility of information on the complaints process as it appears on the websites of telecommunications companies. Option consommateurs concluded that, although there generally is a link somewhere on the website to a text that mentions or explains the complaint process, neither the locations, names, or descriptions of the process (sometimes absurdly short) are consistent. Option consommateurs also noted that there is generally no disclosure of the complaint process on service providers' invoices. Service providers generally believe that the best course of action for consumers is to call customer service, which will handle their issue. And Option consommateurs to conclude that consumers are not well aware of the complaints process.⁶⁹

The companies which Option consommateurs was in contact with for its study all confirmed that they made sure to quickly resolve complaints, though firm commitments regarding processing times and the disclosure of such times to consumers does not appear to be part of reported practices. Similarly, all the companies claim that the complaints are reviewed and that they are working on improving practices and services based on their analyses.⁷⁰ However, there is a lack of objective data to check the validity of these statements.

Note that the present ISO standards do not deal with the actual content of corporate policies and commitments; this approach is easily understandable since the proposed models are designed to be adaptable to all types of companies.

⁶⁹ OC, *Avez-vous le bon numéro?* 2010.

⁷⁰ *Idem*

When the customer service of a single industry is reviewed, weaknesses appear in ISO's approach, once again, that are justified and assumed. With respect to telecommunications, it may be valid to say that merely disclosing that a complaints process is in place is not enough, and that the methods used to access information on this topic should be standardized. Or that internal complaints processes should all provide the same guarantees, from one company to another. Or that the means and wait times to access customer service should be revised and standardized. And so on.

But this is not the purpose of these standards.

ISO 10003:2007⁷¹ – Guidelines for dispute resolution external to organizations

General

This International Standard provides guidance for organizations to plan, design, develop, operate, maintain and improve effective and efficient external dispute resolution for product-related complaints. Dispute resolution gives an avenue of redress when organizations do not remedy a complaint internally. Most complaints can be resolved successfully within the organization, without the need for further time-consuming and more adversarial procedures.

NOTE 1 Organizations are encouraged to develop an effective and efficient internal complaints-handling process consistent with ISO 10002.

Because of the existence of the CCTS, this standard is much less useful in Canada. However, the above Note is worthy of mention, though obvious to us, but the International Organization for Standardization still thought it should be reiterated.

⁷¹ ISO, *ISO 10003:2007(en) – Quality management – Customer satisfaction – Guidelines for dispute resolution external to organizations*. <https://www.iso.org/obp/ui/#iso:std:iso:10003:ed-1:v1:en>

4 MEDIATION SERVICES

As deregulation made its way into the various telecommunications sectors, it quickly became apparent, regardless of the country involved, that even though consumers were reporting general satisfaction levels with customer service ranging from 70% to 90%, many consumers were still dissatisfied with the treatment they received from their service provider's customer service, citing problems with interpersonal relations as well as the inability of customer service to adequately resolve their problem.

During the first years following market deregulation, dissatisfied consumers had no other recourse, when customer service did not provide an adequate resolution to disputes, than to turn to their country's judicial system to obtain reparation. This came at a significant financial cost for the wronged consumer, and also had the effect of bogging down the legal system.

Various consumer advocacy groups, particularly in Europe, publicly spoke about the situation along with the fact that the number of complaints they were receiving was constantly on the rise. Several groups made government authorities aware of the situation, and the latter in turn tried to get companies to adopt a solution-oriented approach.

In the early 2000s, a few private telecom companies in France got together and drew up a model for mediation services tailored to telecommunications services, the Association Médiation de la Téléphonie (which in 2007 became the Association Médiation des communications électroniques).⁷²

[TRANSLATION] The Electronic Communications Sector is the first private professional sector to acquire a sector-based mediation scheme along with a single and independent Mediator, in 2003, 13 years ahead of the European Union Directive and the implementation into French law.

Real proof of the sector's commitment to responsibility towards its customers, and an innovation for consumers at the time.

Since February 2016, the Electronic Communications Mediator has been on the list of Mediators that meet the requirements of Articles L 153-1 to L153-3 of the Consumer Code.

The Mediator is in fact on the European Union's list of Mediators accredited by the Commission d'évaluation et de contrôle de la médiation de la consommation (CECMC) for handling transborder disputes.⁷³

The government authorities of several countries then followed suit and encouraged all the companies in their respective boundaries to take part in drawing up such mediation services.

In 2013, the European Commission went one step further and required that all its Member States set up administrative dispute resolution processes in all consumer-related areas, including telecommunications.

Directive 2013/11/EU on alternative resolutions for disputes between traders and consumers

⁷² LE MEDIATEUR DES COMMUNICATIONS ELECTRONIQUES, *Qui sommes-nous*. <https://www.mediation-telecom.org/qui-sommes-nous>

⁷³ *Ibid.*

WHAT IS THE AIM OF THE DIRECTIVE?

It ensures that EU consumers can submit their contractual dispute with an EU trader over a product or service to an alternative dispute resolution (ADR) entity — a recognised body whose role is to resolve disputes by means of ADR procedures, i.e. without going to court.

It sets out binding quality requirements for ADR entities and procedures to ensure aspects such as transparency, independence, fairness and effectiveness.

Compliance is ensured by national competent authorities designated by EU countries.

It obliges traders to inform consumers about ADR when the former have committed or are obliged to use ADR and when they cannot bilaterally resolve a dispute with the consumer.⁷⁴

4.1. OVERVIEW OF MEDIATION SERVICES

Whether called ombudsman, mediator or some other name, the telecommunications mediation services that have been progressively implemented both in Europe and the Americas or in Oceania basically have scopes of action that are defined by fairly similar basic mandates. They were created to arbitrate the disputes that can occur between consumers and their communications provider which customer service did not manage to resolve.

Later on we will see a few examples of the scope of the mandates of mediation services, but we can already say that very few pertain to problems that are directly related to customer service. For instance, the telecommunications mediation service in Belgium⁷⁵ may receive a complaint related to the way a consumer was treated by customer service, but its role is basically to make recommendations to the company.

Before lodging a complaint with a mediation service, consumers must first have contacted the telecom provider's customer service to attempt to resolve the dispute. When the service provider's complaints-handling process provides for the possibility of an appeal or review at a higher level in the company – or with an independent external ombudsman –, consumers must also have gone through these steps before resorting to mediation.

Once these steps have been completed, a consumer may, if the dispute was not resolved to his satisfaction, contact the mediation service which, once it has received the consumer's complaint, will review it to decide whether it is admissible or not. When the complaint is deemed admissible by the mediation service, the latter will ask the company to provide explanations and, with the information it has on hand, it will attempt a conciliation to have the parties reach an amicable resolution. Otherwise, the mediation service will issue a recommendation to the company. Depending on the mediation service's mandate or procedural framework, the company may not be obligated to follow it; in such a case, the mediation organization may make a final decision which the service provider will have to comply with, if the associated terms are accepted by the consumer.

⁷⁴ Directive 2013/11/EU on alternative resolutions for disputes between traders and consumers. https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=LEGISSUM:0904_3&from=FRA

⁷⁵ SERVICE DE MEDIATION POUR LES TELECOMMUNICATIONS. <http://www.ombudsmantelecom.be/fr/accueil.html?IDC=3>

To be admissible, the complaint must obviously be part of the mandate that defines the mediation service's scope and authority. In most cases, for a complaint to be accepted, it must involve a specific consumer dispute, such as a billing error, disagreement regarding the interpretation of a contract or plan, cancellation or interruption of service, etc.

Most mediation services set up by telecommunications regulatory authorities, or more directly by the government, have a status and structure aimed at ensuring their independence, even if most of them are basically funded by telecom companies, based on contribution formulas that vary from country to country.

Though certain stakeholders have a problem with this type of funding, most consumer groups consider that these mediation services are nonetheless relevant and rather efficient. This efficiency is confirmed by the annual reports of several of these organizations, which report very high resolution rates for admissible complaints: 91% for the CCTS,⁷⁶ 96.02% for the Service Médiation Télécommunications⁷⁷ (Belgium) and 95% for the Médiateur des communications électroniques⁷⁸ (France).

However, there is a downside: several consumers, as we will see, are unaware of the existence of these mediation services or their scope. For these consumers, customer service thus often constitutes their last recourse. This should therefore argue in favour of having a customer service that is as efficient as possible. But this could also unfortunately mean that telecom companies, realizing that consumers are generally not aware of their recourses when they are dissatisfied, may not be overly concerned about resolving disputes to keep consumers satisfied.

Since they were created, the various mediation services have seen fluctuations in the number of complaints received and accepted. Overall, there is a general progressive increase in the number of complaints for wireless and the Internet, while the decrease in popularity of some services, such as landline, has a corresponding drop in complaints.

Lastly, the annual reports of the various mediation services or consumer groups directly concerned by the telecom sector reveals that one company may often stand out from the others by generating a major share of the complaints lodged with mediation services.

4.2. MEDIATION MODELS

It would have been time-consuming to present each mediation service, all the various regulatory authorities, and the consumer advocacy groups for each country that we looked at during our research. Instead, we will be presenting a few that are more representative or that stand out through the role they play, their actions or the approaches they advocate to ensure greater fairness in relations between communications providers and consumers.

⁷⁶ CCTS, *Annual Report 2016-2017*. <https://www.ccts-cprst.ca/wp-content/uploads/2017/11/CCTS-Annual-Report-2016-2017.pdf>

⁷⁷ SERVICE MEDIATION TELECOMMUNICATIONS, *Rapport annuel 2017*. Available at: <http://www.ombudsmantelecom.be/fr/rapport-annuel.html?IDC=21>

⁷⁸ LE MEDIATEUR DES COMMUNICATIONS ELECTRONIQUES, *Rapport d'activités 2017*. <http://rapportmediateur2017.mediation-telecom.org/>

4.2.1. Canada

In 2007, the Canadian government ordered the Canadian Radio-television and Telecommunications Commission (CRTC) to set up an industry-funded independent telecommunications consumer body to resolve complaints from individual and small-business retail customers. Soon afterwards, in July 2007, the Commissioner for Complaints for Telecommunications Services – which has since become the Commission for Complaints for Telecom-television Services (CCTS) – was formed.

Initially, only telecom companies with revenues greater than \$10 million were required to join the CCTS. Since 2011, all companies are required to be part of the organization, including the smallest companies, which must automatically join as soon as a complaint is made against them. In 2017, the organization's mandate was broadened to include cable television services in addition to all telecommunication services (mobile, wireless and the Internet).

Under its mandate, the CCTS can handle consumer complaints involving issues related to contracts, billing, service delivery (repairs, disconnection, unreasonable interruption) and credit management (security deposits, payment arrangements, collection procedures). In addition to ensuring that contract terms are observed, the CCTS applies the various Codes established by the CRTC on wireless services, cable television, and disconnection.

However, the CCTS's mandate contains a certain number of explicit exclusions: the organization does not handle disputes involving matters such as equipment, inside wiring, the price of products and services, and the protection of personal information. The CCTS also does not handle complaints pertaining to customer service. However, in its Annual Report 2016-17, the Commission still provided a tally and breakdown of complaints received on this issue.

Complaints received by the CCTS – Customer service

| section 4 du Code de procédures | |
|---|--------------|
| section 4.1 service à la clientèle | |
| <i>barrières linguistiques</i> | 85 |
| <i>sous-traitance</i> | 168 |
| <i>représentant impoli</i> | 641 |
| <i>temps d'attente</i> | 1 234 |
| Total | 2 128 |
| section 4.3 politiques et pratiques générales des FSP | 2 461 |
| TOTAL | 4 589 |

Figure 14 – CCTS – Annual Report 2016-2017

Furthermore, unlike the French mediator, the CCTS also does not currently have any real power to make recommendations to telecom companies. However, it reviews the complaints that are received and identifies the general trends and issues, which it then reports to the CRTC and the government.

The CCTS is fully industry-funded. Each service provider must pay fees for the complaints accepted and handled by the CCTS, and the largest service providers must pay an additional annual fee.

154. The CCTS is funded by its participants. Its funding model was initially 100% revenue-based and has evolved over time to be increasingly complaint-based, where each participant pays a fee for each complaint accepted by the CCTS. This fee contains a series of escalating price levels, which are designed to provide an incentive for early resolution of complaints, and to compensate the CCTS for the additional resources required to deal with complaints as they proceed through the CCTS complaints process. Participants in the CCTS whose annual revenues are greater than \$10 million also pay an annual fee which is calculated to be proportionate to each participant's share of the total eligible Canadian telecommunications revenues of those participants. Participants with less than \$10 million of annual revenues currently pay an annual fee of \$100.⁷⁹

Note that in addition to its limited mandate and powers, the CCTS must deal with another sizeable challenge: its low level of public awareness.

Based on a survey conducted by Environics Research in 2016, only 20% of respondents had a general awareness of the CCTS: "To the extent that people have heard of CCTS it is from news media reports or their own online searches. Very few people say they heard about CCTS from their telecommunications provider." The survey also revealed that less than half of respondents with an unresolved complaint believed they had any recourse. Worse, only 31% of those with an unresolved complaint and who were aware of the CCTS used its services. "Most of those who have not contacted CCTS say they just didn't think it was worth their time or were busy."⁸⁰

Another survey requested by the CRTC and conducted by TNS Canada also in 2016⁸¹ concluded that only 2% of all complaints from wireless service customers were lodged with the Canadian mediation service. 69% of respondents claimed to be unaware of the CCTS's existence and only 7% recalled having been told by their service provider of the CCTS's existence and role.

The survey did not directly address the issue of wireless service providers' customer service, which neither the CRTC or the CCTS covers; rather, at most it sought to determine consumers' level of satisfaction regarding the solution proposed by their service provider during attempts to resolve disputes.

Canadians that tend to complain, do so often, averaging 2.88 complaints in the past twelve months. They tend to complain to their service provider and mostly about incorrect charges on their bill, data charges, poor service quality and misleading contract terms. [...]

One quarter (25%) of complainants feel their complaint was not resolved and close to half (46%) are not satisfied with the resolution of their complaint. 2015 and Spring 2016 results indicate higher satisfaction among those who raised their complaint with the CCTS.⁸²

Wireless complaints tend to be directed to Canadians' wireless service providers, and Canadians tend to be dissatisfied with the resolution offered. Previous research indicates improved awareness of the CCTS also increases satisfaction with complaint resolution.

⁷⁹ CRTC, *Broadcasting and Telecom Regulatory Policy CRTC 2016-102*, March 17, 2016.

<https://crtc.gc.ca/fra/archive/2016/2016-102.htm>

⁸⁰ ENVIRONICS RESEARCH. *Commissioner for Complaints for Telecommunications Services Public Awareness Survey 2016*, May 2016. https://www.ctcs-cprst.ca/wp-content/uploads/2017/06/Environics_-_CCTS_Awareness_Survey.pdf

⁸¹ KANTAR TNS, *Wireless Code Public Opinion Research – Fall 2016*. <http://epe.lac-bac.gc.ca/100/200/301/pwgsc-tpsgc/por-ef/crtc/2016/027-16-e/report.pdf>

⁸² *Ibid*, page 11.

Thus, improving awareness of the CCTS has the potential to improve satisfaction with complaint resolution.⁸³

Survey among CCTS users

Nous avons demandé à nos clients comment ils avaient d'abord entendu parler de la CPRST. Nos clients ont répondu :

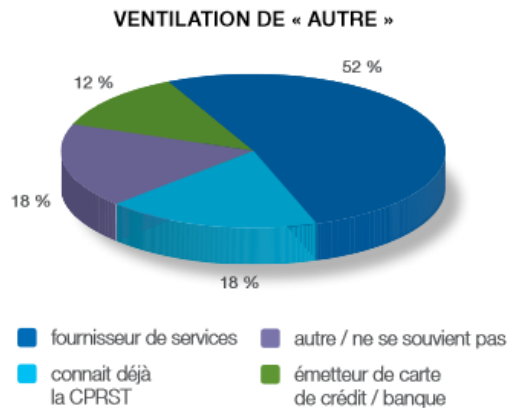
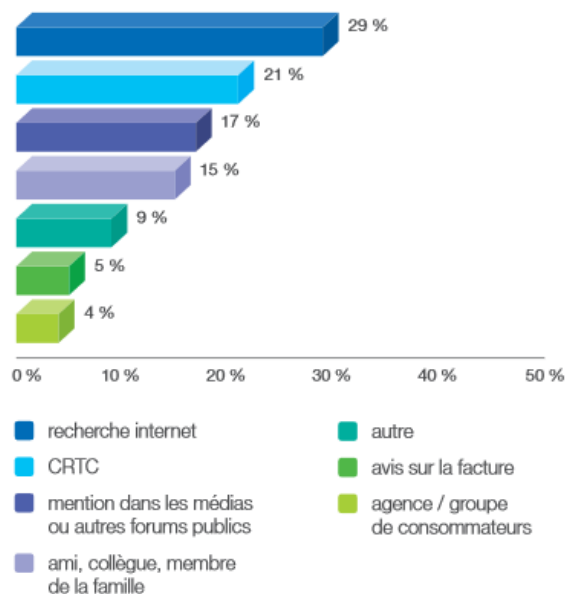


Figure 15 – CCTS – Annual Report 2016-2017, p. 50

Not surprisingly, in its Annual Report 2016-17, the CCTS mentions that the CRTC had asked it to “enhance efforts to improve public awareness of the CCTS” as of the following year.

4.2.2. France

The Association Médiation des Communications Électroniques⁸⁴ (AMCE) was created in 2003, namely for the amicable resolution of disputes between consumers and telecom service

⁸³ *Ibid*, page 13.

providers and to thus avoid the predictable explosion of legal action. The AMCE [TRANSLATION] “brings together virtually all communications service providers (mobile, landline, fibre optics), which represents over 99% of the consumer telecommunications sector in France.”

Its mediator is appointed upon consultation with the Direction générale de la Concurrence, de la Consommation et de la Répression des Fraudes (DGCCRF), the Autorité de régulation des communications électroniques et des postes (ACERP), and consumer groups.

Like most other mediation services, the French mediator receives and handles complaints, except in some rare instances, within 90 days.

In its 2016 Report, the mediator however noted that 56% of complaints lodged by consumers were inadmissible. It therefore appears that the scope of the mediator’s mandate is still not well known or its scope of action is too limited. For instance, customer service as such is not part of the mediator’s mandate, even though it is part of its concerns.

In addition to those part of its neutral role as intermediary for resolving disputes, the French mediator has the power to issue recommendations to all service providers based on the recurring complaints it receives. To prevent overbilling problems, for instance, the mediator has recommended to all service providers who were not already doing so to alert consumers who were about to exceed their plan’s limit.

To ensure the application of the mediator’s recommendations, at the end of the year, the mediator sends a questionnaire to all telecom service providers. In 2016, the mediator drew up 19 recommendations compared to 12 in the previous year.

4.2.3. United Kingdom

The Office of Communication⁸⁵ (Ofcom) is the regulatory and competition authority for the broadcasting, telecommunications and postal industries in the United Kingdom. Customer service is not part of Ofcom’s mandate. However, a page on its website specifically deals with telecom providers’ customer service:

If you experience poor customer service you should tell the company concerned.

All communication providers are required to have a Code of Practice (CoP) outlining, amongst other things, how they will deal with customer complaints.

The CoP is sometimes available on the company’s website, back of a bill or directly from customer services.

If you follow their complaints procedure, the chances are any problems will be resolved.

If this doesn’t work, ask your provider for a deadlock letter. This enables you to take your complaint to an Alternative Dispute Resolution (ADR) scheme.

ADRs act as an independent middleman and will examine the case from both sides and reach a decision they think fair. If eight weeks have passed since you first formally complained you can contact the ADR directly.

⁸⁴ LA MEDIATION DES COMMUNICATIONS ELECTRONIQUES. <https://www.mediation-telecom.org/>

⁸⁵ Ofcom. <https://www.ofcom.org.uk/>

There are two ADR schemes – Ombudsman Services: Communications, and the Communications and Internet Services Adjudication Scheme (CISAS). All service providers must belong to one of the schemes.

Your provider will tell you which scheme it is a member of, or you can use our ADR checker.

Tell Ofcom

Although it is not Ofcom's role to handle customer service complaints, we still take a close interest in monitoring consumer experiences⁸⁶.

The UK has had Ombudsman Services⁸⁷ since 2003 whose mandate covers landline, wireless and Internet services. Telecom service providers are not required to use the Ombudsman Services, but most still do. The Ombudsman Services handle complaints directly pertaining to services provided by their members, including cable television. The organization mentions that it does not handle complaints dealing with the content of its members' websites, advertising and other communications by telecom service providers. Nor does it deal with complaints involving "commercial decisions made by communications companies about whether to provide a product or service, and the terms under which they may be provided."

Ofcom has also recognized the Communication & Internet Service Adjudication Scheme⁸⁸ (CISAS) since 2003, which also plays a mediation role between member telecom service providers and consumers. It provides its arbitration services mainly for disputes regarding customer service, billing, and the scope and interpretation of contracts.

When a complaint is submitted in writing by a consumer, it is given to a professional and independent CISAS adjudicator who, after reviewing the complaint, asks the service provider to submit its position in writing. During the entire process, it will have no other direct contact with the consumer or with the service provider to ensure the utmost impartiality for the arbitration process. As with the Ombudsman, the arbitrator's decision is binding on the telecom company if accepted by the consumer; otherwise, it is invalid.

During our preliminary investigation, WHICH?⁸⁹, the largest independent consumer body in the UK, stated having checked the extent to which consumers were aware of these services, which can save them the trouble of going to court. It thus polled its members, consumers who were basically already concerned about their rights. However, only 20% of them were aware of the services provided by the Ombudsman Services and 3% of those provided by CISAS.

This lack of awareness of the various mediation services and their mandate unfortunately appears to be a limitation, and was noted several times during our research.

⁸⁶ OFCOM, Customer service. <https://www.ofcom.org.uk/phones-telecoms-and-internet/how-to-report-a-complaint/customer-service>

⁸⁷ OMBUDSMAN SERVICES. *About Ombudsman Services: Communications*. <https://www.ombudsman-services.org/sectors/communications>

⁸⁸ COMMUNICATION & INTERNET SERVICE ADJUDICATION SCHEME. <https://www.cedr.com/consumer/cisas/>

⁸⁹ WHICH? <https://www.which.co.uk/>

CONCLUSION AND RECOMMENDATIONS

Who has not heard the well-known phrase “Your call is important to us” while desperately trying to reach the telecom provider’s customer service? The quality and efficiency of customer service are more important than ever given that telecommunications products and services are now a part of our daily life.

Our research attempted to review the situation in Canada with respect to customer service and to find, if needed, viable solutions to any problems that may have been identified.

With respect to telecommunications, customer service, which includes a multitude of means and reasons for the consumer to contact the service provider, can be broken down into six parts:

- Information: handling requests for information, explaining services, products and billing, etc.
- Sales and customer retention: taking orders, switching plans, promoting products and services, etc.
- Administration: new subscriptions, updating accounts, closing accounts, etc.
- Technical: installation, repairs and modifications, etc.
- Resolving problems: technical problems, management of notices and disconnections, etc.
- Complaints handling.

Customer service is therefore likely to be used by consumers for the duration of their relations with the service provider, from the initial contact prior to subscribing to account closing and disconnection, including obtaining answers to all types of questions and resolving all kinds of technical or administrative problems which a consumer may encounter while subscribed to the service. It is therefore not surprising that consumers regularly contact customer service, at times with mixed results.

In the last few decades, there have been numerous changes to the customer service of various merchants with the advent of new technologies and social media and the proliferation of means of communication with consumers. However, there has been slower development and growth in customer service in the telecom sector, likely as a result of its relatively recent deregulation. So where does the customer service of telecom providers currently stand in Canada?

In general, consumer groups in Canada and, to a certain extent as well, regulatory authorities in the sector have until now been more concerned with fraudulent activities and misleading advertising on the part of telecom providers, governed by laws and regulations, or accessibility, which the CRTC oversees, than the quality of customer service.

It is difficult, if not impossible, to assess the overall efficiency of customer service with certainty and objectivity: in fact, there are few or no tools or data for conducting an in-depth study of the current situation. What is more, Canadian companies, when they collect statistics of cases where their customer service failed to reach an agreement with a customer, are careful to not share them. It is also impossible to precisely know their respective standards regarding

customer service: from personnel training to policy on the separation of the sales department from that of customer service, for instance, or the process or frequency of verifying the application of such standards. Telecom companies will likely all say that they are putting the customer first in all their decisions or activities, but what measures are actually taken in this regard, and how does this reflect on customer service?

To assess customer service, surveys remain, which, depending on the analysis that is done and the overlaps that are taken into account, may provide an inconclusive picture, as well as the complaints received by regulatory authorities, mediation services and consumer groups, which must deal with problems which customer service was unable to resolve. These data still allow an interesting, though incomplete, overview to be obtained of the quality of telecom providers' customer service in Canada.

Using a pan-Canadian survey, we attempted to see how consumers rate their relations with their telecom providers' customer service and identify the most problematic aspects of these services. Note that the survey yielded certain results that are initially surprising and should be qualified.

With a satisfaction level with the customer service of telecom providers of roughly 80%, one may think that there are no problems.

However, this overall level of satisfaction which respondents give tends to drop when the call to customer service involves resolving a problem rather than just a request for information. The respondents' level of satisfaction is in fact 10 to 20% lower when the call involves resolving a problem with service or equipment, an interruption in service or a billing error. Consumers are therefore fully satisfied with their telecom provider's customer service... until they encounter a problem and expect that customer service will resolve it. This despite the fact that resolving customer problems is an essential facet of telecom providers' customer service. This is therefore a first important qualifier.

In addition, although the level of satisfaction with telecom providers' customer service is relatively high, based on various surveys, it ranks among the lowest when compared to the customer service of companies in other sectors. Studies conducted in Quebec and the United States in fact rated it second-to-last, just ahead of government services. Even sectors with a rather poor reputation among consumers such as banks, insurance companies and even air carriers had a better rating. Enough said!

Consumer satisfaction statistics, which are very positive at first glance, therefore conceal a much more qualified reality. Hence, regardless of the level of satisfaction reported by consumers – which, it should be pointed out, is highly subjective, as consumers may consider themselves satisfied if they receive a response, whereas the response may be incorrect, incomplete, etc. –, we have noted that service providers' customer service does not currently play the role that it could or even should play. The Economist Intelligence Unit stated in 2015 that customer service should become a key factor in competition between companies, and that the literature is unanimous on the strategic and economic advantages (better knowledge of customers' needs and expectations, increased sales, lower costs and greater customer retention) of high-level customer service, which plays a key role in companies' overall decision-making. Unfortunately, one must admit that this is not a strength among Canadian telecom providers. The survey respondents instead found customer service to be one of their telecom

provider's weakest areas, well below service quality or reliability, but not surprisingly ahead of price.

The general picture of telecom providers' customer service is also clouded by the CCTS's troubling statistics, although the CCTS has no powers in this respect. The complaints received regarding customer service have tripled in the last four years and accounted for close to one-third of all out-of-mandate complaints received by the organization.

In addition to the complaints directly involving telecom providers' customer service, all the complaints lodged with the CCTS are of interest since they are only filed after consumers obtain an unsatisfactory response to their various problems from telecom providers' customer service. If customer service were to completely resolve all customer complaints, there would be no need for an organization such as the CCTS. However, the significant increase in the number of complaints received by the CCTS in the last few years confirms that there is, in fact, such a need. The CCTS's statistics appear to indicate that the resolution of customer problems by telecom providers, a key aspect of customer service, has numerous weaknesses and requires more work by telecom providers.

Some may wonder how much emphasis should be placed on this weakness of customer service given that there is an organization like the CCTS that is capable of resolving the problems which customer service was unable to, or to do so to the consumer's satisfaction. It is therefore important to recall the relatively low level of customer satisfaction when resolving a problem with a service provider⁹⁰ and the CCTS's very low public awareness. Whether their problem was not resolved or, in their opinion, was poorly resolved, the number of consumers who will take the next step and contact the CCTS is therefore very limited, due to lack of awareness of the CCTS or its mandate, or because they cannot be bothered.

Note as well that it should be in the service providers' interest to directly resolve consumer problems (and to the latter's satisfaction) rather than wait for the CCTS to intervene. These are the same service providers who pay for the organization, based on the number of complaints received by the organization that concern them. By adequately resolving consumer problems internally, service providers may realize significant savings and avoid the CCTS's review. But this incentive does not appear to be as successful as had been hoped.

The dissatisfaction or problems experienced by many consumers in relation to customer service have in fact been considered sufficiently serious by many foreign jurisdictions and institutions for them to decide to intervene, tighten the rules and impose certain standards. Why not follow their example?

We have thus covered in this report various measures implemented by monitoring and/or regulatory bodies such as ARCEP (France), Ofcom (UK), the FCC (USA) or ACMA (Australia). These measures in fact cover several aspects of customer service that were also criticized in Canada.

Let's take the example of the 30-second wait time which cable operators' customer service must comply with in the U.S. Though such a measure has the undeniable advantage of

⁹⁰ The level of satisfaction, already not very high, may furthermore be misleading. Since consumers are generally not very aware of their rights, they will probably often say they are satisfied with a resolution that is, from an objective standpoint, very unfavourable for them.

standardization that allows compliance to be measured, even less drastic measures could improve the situation, such as the obligation that Australian service providers have of publicizing the average customer service wait time – which enables consumers to have fast access to a customer service rep or, at the very least, to know where they stand, in order to take action accordingly. It is likely that if Canadian service providers were to publicly disclose the average wait times, some would be actively seeking to quickly improve this statistic.

While having to wait for an installation technician for several hours, who sometimes may not show up at the scheduled time, is another source of frustration for consumers, Australia provides an example of a very interesting measure, which namely includes indicating maximum durations for appointment times, notifications in the event of a change, and delays of at most a few minutes, with associated penalties.

Among the most important aspects of the measures implemented in these countries, note the fact that non-compliance with them often involves penalties, and that they include accountability requirements. Australian service providers, for instance, have many obligations associated with documenting consumer complaints (including the rate of resolution, solutions proposed to consumers, the paid compensation, and consumer satisfaction levels) and they must regularly submit reports to the appropriate authority. In the United States, non-compliance with the rules by the service providers' customer service will be a factor at licence renewal. These are important incentives for service providers that ensure that the protection put in place for consumers is not only theoretical.

In short, we believe that it would be desirable for Canadian telecom providers' customer service to be better monitored so that consumers know what they are entitled to expect when contacting a service provider's customer service. This monitoring may be carried out by the CRTC, namely by establishing certain minimum standards and accountability requirements for all standardized elements and for complaints handling that would allow authorities to oversee compliance with standards, revise them, if required (or require that they be revised), and deal with offenders. The measures in this respect in the UK, Australia and the United States could certainly serve as an example for the CRTC.

Note, moreover, that despite the general satisfaction they expressed with regard to the customer service of their main telecommunications provider, the Canadian consumers that were polled were still mostly in favour of having customer service regulated in order to implement certain minimum standards, to ensure, in particular, the adequate training and efficiency of customer service reps, etc.

In addition for the need to have competent authorities enforce the possible regulation of service providers' customer service, it is imperative that Canadian consumers have access to more useful recourses in the event of a problem with a service provider's customer service.

Although the CCTS responds to some consumer needs, it does not directly handle consumers' problems with a service provider's customer service. The CCTS still receives numerous complaints each year on this issue, which is an indication that it is difficult for consumers to distinguish between the competent authorities according to the various problems they encounter with their service provider.

The CCTS's mandate could definitely cover several aspects of service providers' customer service; we consider it very unlikely that it can cover all customer service-related problems.

Even with a broader mandate, some problems are simply not consistent with the CCTS's operation and powers. Let's take the example of a consumer waiting for a service provider's installation technician for several hours without the technician showing up. Could the CCTS truly force the service provider to observe its appointment times and/or perform installation work at a specific time? This is hard to conceive, in particular for issues of lateness. Setting up financial compensation, at the CRTC's request, appears more appropriate for this type of problem.

In addition, the broadening of the CCTS's mandate will have a limited effect in the absence of measures to increase the organization's awareness by Canadian consumers. Recall that most consumers are unaware of this mediation service and that as a result, customer service constitutes a customer's final recourse in the event of a problem.

Given all of the preceding, Union des consommateurs is making the following recommendations:

So that consumers are better served by customer service and know what to expect:

- **Union des consommateurs is recommending that the CRTC** require telecom providers to adopt customer service policies that are customer-centric and that cover the various elements developed in ISO 1002:
 - o Visibility
 - o Accessibility
 - o Responsiveness
 - o Objectivity
 - o Charges
 - o Confidentiality

- **Union des consommateurs is recommending that the CRTC** require the inclusion, in the service providers' customer service policies, of certain standardized elements, both technical and non-technical, which the CRTC will have delineated, with respect to:
 - o Phone wait times for reaching customer service;
 - o Response and resolution times for certain problems;
 - o Reserving time for installations, repairs and other services, and delays;
 - o Monetary compensation for consumers in the event of non-compliance with standardized and other elements.

- **Union des consommateurs is recommending that the CRTC** require service providers to include their customer service policies in their service contract and make them available on their website and in-store, in order to ensure easy access by all consumers;

So that the CRTC can ensure compliance with the established standards and have a clear picture of the situation and of the revisions to be regularly made to the measures that have been implemented, and also ensure that customer service is doing its job with respect to consumer complaints-handling:

Union des consommateurs is recommending that the CRTC:

- Require service providers to provide it with a copy of their full customer service policies;
- Conduct an in-depth review of said policies;

- Take the necessary measures to ensure compliance with said policies;
- Order the necessary changes to ensure compliance with a customer-oriented approach.

- Require service providers to keep detailed registers that include:
 - For all calls received by customer service:
 - Number of calls received;
 - Type of calls received;
 - Handling times by type of call;
 - For complaint handling:
 - Number of requests received;
 - Complaint topic;
 - First-call resolution rate, by topic;
 - Number of transfers, by topic;
 - Handling and response times, by topic;
 - Rate of resolution and non-resolution, overall and by topic;
 - Solutions proposed to consumers, by topic;
 - Post-handling follow-up of complaints.

- Share its data with the CCTS so that it can cross-reference it with its own data and submit reports on a more complete picture of the follow-up and resolution of consumer complaints.

To facilitate the recourses of consumers when there is a problem with a service provider's customer service:

- **Union des consommateurs is recommending that the CCTS's mandate** be clarified in order to indicate that it will include, in the near future, the handling of the problems of telecommunications/cable television subscribers with the service providers' customer service in accordance with the policies which the latter will have adopted.

ANNEX 1

DOCUMENTS CONSULTED

Australia

Industry Code

Telecommunications Consumer Protections Code

Communication Alliance 2017

Telecommunications (Customer Service Guarantee) Standard

Office of Legislative Drafting and Publishing

Customer Experience Series

Cost of Complaining

EY (2014)

Belgium

Rapport annuel 2016

Service de médiation pour les télécommunications

Canada

CCTS

Annual Report 2016

Wireless Code public opinion research 2016

Annual Report 2017

Enquête Télécoms

Protégez-Vous 2017

United States

Customer Service Standard

Federal Communications Commission

American Customer Satisfaction Index 2017

France

Analyse des indicateurs de la qualité de service dans les télécommunications

AFUTT

Rapport annuel 2016

Le médiateur des communications électroniques

L'évolution de la relation client

Du CRM au VRM

Livre blanc B2S 2013

Méthode d'évaluation de la qualité des services sur les réseaux mobiles
Les Actes de l'ARCEP novembre 2012

Observatoire des plaintes et insatisfactions 2016
recueillies et analysées par L'AFUTT

Parcours Client:
La nécessité d'une stratégie multicanal sans rupture
Business Service Orange

L'Autorité et les marchés régulés
Rapport d'activité 2017
ARCEP

United Kingdom
Automatic Compensation
Protecting consumers from quality of service problems
OFCOM 2017

Comparing Service Quality: a summary
OFCOM 2016

The Office of Communications
Annual Report & Accounts
(Avril 2016- Mars 2017)

Setting customer service standard
The Institute of Customer Service 2015

Making a difference together
Ombudsman Services (Rapport 2016)

Switzerland
Révision partielle de la loi sur les télécommunications
Fédération Romande des consommateurs 2016

REVUE DE PRESSE

Centre d'appels : comment ne plus énerver vos clients?
RelationClientmag.fr September 2014

Customer Service Buying Guide
Consumer Reports (May 2016)

La constante évolution de la fonction relation client dans l'entreprise
RelationClientmag.fr October 2015

Internet et téléphonie : explosion des plaintes de consommateurs en 2016
Le Parisien (March 29, 2017)

Le pire et le meilleur du service à la clientèle
Isarta Infos

Les enjeux démocratiques de la régulation des services publics
Revue internationale d'éthique sociétale et gouvernementale
(vol. 9 N°2 2007)

Marketing : Comment offrir un excellent service client sur les médias sociaux
Brandwatch Blog (March 9, 2016)

Télécoms : Bell encore championne du nombre de plaintes
Protégez-Vous (December 2015)

Telecom industry needs to up its game
RCR Wireless News (May 2015)

Télécoms : les plaintes bondissent de 50 % en 2016
Le Parisien (March 29, 2017)

The problem with consumer service
Consumer Reports (July 2015)

What do customers really think about long wait times?
ICMI Improving Customer Experiences (March 2017)