



1 June 2020

Mr. Ian Shugart
Clerk of the Privy Council and Secretary to the Cabinet
Langevin Block
80 Wellington Street
Ottawa, Ontario K1A 0A3

BY EMAIL info@pco-bcp.gc.ca

Dear Mr. Shugart,

Re: *Petition to the Governor in Council concerning Telecom Decision CRTC 2020-80, Public Interest Advocacy Centre and National Pensioners Federation – Application regarding paper billing by Koodo Mobile*

Petition of the National Pensioners Federation and the Public Interest Advocacy Centre (“NPF-PIAC”)

The following organizations hereby submit a petition to overturn an important decision by the Canadian Radio-television and Telecommunications Commission (the “CRTC”):

- the National Pensioners Federation; and
- the Public Interest Advocacy Centre (“PIAC”)

—together, “NPF-PIAC”.

NPF-PIAC petition the Governor in Council to ensure consumers have the choice of format for all communication services, and in particular, wireless bills (invoices), thereby restoring much-needed control by consumers. NPF-PIAC therefore respectfully request that the Governor in Council issue an Order pursuant to Section 12 of the Telecommunications Act **rescinding the decision or referring it back to the CRTC for reconsideration.**

ALL OF WHICH is respectfully submitted this 1st day of June, 2020.

[original signed]

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Trish McAuliffe, President
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Stephen Schmidt, Vice-President, Telecom Policy & Chief Regulatory Legal Counsel,
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Encl.

***Petition to the Governor in Council
pursuant to Section 12 of the Telecommunications Act
Re: Telecom Decision CRTC 2020-80
Public Interest Advocacy Centre and National Pensioners
Federation – Application regarding paper billing by Koodo
Mobile***

**Petition of the National Pensioners Federation and the Public
Interest Advocacy Centre**



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Introduction and Petitioners

1. The National Pensioners Federation and the Public Interest Advocacy Centre (“**NPF-PIAC**”) file this Petition to the Governor in Council **to rescind or to refer back to the CRTC for reconsideration** the decision of the Canadian Radio-television and Telecommunications Commission (the “**CRTC**” or the “**Commission**”) in Telecom Regulatory Policy CRTC 2020-80, *Public Interest Advocacy Centre and National Pensioners Federation – Application regarding paper billing by Koodo Mobile* (3 March 2020) (hereafter “**CRTC 2020-80**” or “**Koodo Decision**”).
2. The National Pensioners Federation (“**NPF**”)¹ is a democratic, non partisan, non sectarian organization which was established in 1945 and incorporated May 1st 1954. We are composed of 350 seniors chapters, clubs, groups, organizations and individual supporters across Canada with a collective membership of 1,000,000 Canadian seniors and retired workers. Our mission is to stimulate public interest in the welfare of aging Canadians. Our goal is to help seniors and retirees have a life of dignity, independence and financial security.
3. The Public Interest Advocacy Centre (“**PIAC**”)² is a non-profit organization and registered charity that provides legal and research services on behalf of consumer interests, and, in particular, vulnerable consumer interests, concerning the provision of important public services. PIAC has pursued this work for over 40 years.
4. NPF-PIAC brought the original application to the CRTC and participated extensively in the proceeding leading to the decision at issue. Note that NPF is an umbrella organization of seniors’ groups with over 1,000,000 total members.
5. The decision at issue in this Petition can be simply and accurately summarized as follows: Koodo (a retail wireless services provider (“**WSP**”) and wholly-owned brand of Telus Communications Inc. (“**TELUS**”)) has been permitted by the CRTC unilaterally and permanently to change their customers’ monthly bill (also known as an “invoice” or “account”) from paper to electronic format.³

1 Online: <http://www.nationalpensionersfederation.ca/>

2 Online: <https://www.piac.ca>

3 See Telecom Decision CRTC 2020-80, *Public Interest Advocacy Centre and National Pensioners Federation – Application regarding paper billing by Koodo Mobile* (3 March 2020).

6. This means that many customers now have no means of accessing their bill. Many customers, often seniors, because of various challenges with electronic communications,⁴ cannot access their bills.⁵
7. This means consumers will be charged for wireless service without notice of, or a real opportunity to review, consider and manage their bill.⁶
8. The result of the removal of customer choice of billing format, including paper bills, are consequences such as: disconnections; late fees, interest payments, loss of opportunity to review and to dispute improper or questionable charges; loss of control of household finances. This leads to danger to consumers (if service is disconnected), extra charges, interest charges, collections calls, consumer anger, confusion and frustration. Consumers feel a real loss of control of their wireless service, their finances and their purchasing power. Consumers learn to distrust their wireless service provider and to have contempt for the telecommunications regulator, the CRTC, whom they view as pathetically out of touch with the real lives of Canadian consumers. Finally, this contempt, fear and insecurity manifests itself in consumer mobilization that leads to political action demanding consumer rights. Such manifestations of consumer political can be harnessed by any party.
9. NPF-PIAC believes that the Cabinet petition mechanism exists to protect Canadians and democracy, in a way that is respectful to the scheme of the *Telecommunications Act*, all the

4 See Interventions Public process number: 2018-0429-5, CRTC file 8661-P8-201804295 - Public Interest Advocacy Centre - Application by Public Interest Advocacy Centre and National Pensioners Federation regarding paper billing by Koodo Mobile. Online: <https://services.crtc.gc.ca/pub/ListeInterventionList/Default-Default.aspx?en=2018-0429-5&dt=i&S=C&PA=t&PT=pt1&PST=a&lang=e>

5 Intervention 11, Tara Mills: "Before signing up with Koodo, I wasn't aware that my bills would be only digital. I hate it. I only have a phone and my bill comes in a message. I can't manage this way. As soon as I can, I will switch to a provider who will mail paper bills. I'm 76 years old but my daughter is 40 and feels the same as I do. It's not just about age." Online: <https://services.crtc.gc.ca/pub/DocWebBroker/OpenDocument.aspx?DMID=3160484>

6 Intervention 26, Kelly Doucette: "I fully support the action to keep paper billing. In dealing with Koodo For more than 7 years, they are famous for billing issues and discrepancies. The Paper bill is the only way I can keep on top of what we are paying. As there are 3 phones on the account, with usage fees that vary every month, there is no valid reason not to have the paper bill sent out with the charges. I understand that if the amount was identical every month, then they can argue there is no need as the payment dates and amounts remain the same. But a wireless service with chargeable communications, periodic add ons and costs for overages, there needs to be consistency in the billing practices.

I have been trying for years to have 3 separate invoices(bills) one for each phone, and have been denied. I cannot even get the paper invoice in my chosen language. I keep receiving it in french. I refuse to create accounts on line for these companies, as they use the personal information to bombard us with sales / marketing / research emails / texts and msg. There is no way to opt out... these tactics often cause overages in a users account and we are then charged for it.

I fully believe that their paperless idea is to increase the charges / revenues they will derive from late payments - non payments and cut off/reconnection fees... There is not an option available to have the bill emailed to you on a regular basis. This move by Koodo has caused me great concern and I have been looking to switch providers that will offer a full billing service." Online: <https://services.crtc.gc.ca/pub/DocWebBroker/OpenDocument.aspx?DMID=3160775>

while reminding the CRTC of its role as regulator in the public interest. The CRTC has clearly failed in its role in this case and consumers demand better.

Main Submissions

10. NPF-PIAC's three main submissions are as follows:

The CRTC's Koodo Decision unilaterally and unfairly removed Canadians' power to interpret, contest, manage and generally control paying their wireless bill, by wrongly interpreting the law, by considering only the views of wireless carriers, not customers, and by removing consumers' choice of billing formats to meet their needs.

11. The CRTC engineered a narrow reading of the law and an unfair consideration of the facts to arrive at a solution that favours only corporations (here, Koodo (TELUS) directly and other wireless carriers indirectly) in opposition to the interests of consumers. The CRTC wholly ignored nearly unanimous public comments arguing against unilateral removal of paper billing by Koodo (TELUS).⁷ The CRTC gave inordinate importance to the economic concerns of TELUS for what the CRTC itself has found is a basic telecommunications service.⁸
12. When a wireless company sells a regulated telecommunications service, which is an essential service, it must take the public as it finds it, as it offers service to all and profits by that offer of service. Therefore it must not be permitted in the name of "innovation" or cost-cutting to attempt to lead consumers into new behaviours that consumers resist against their stated interests. Should a telecommunications service provider desire to move to new approaches to its service to customers for efficiency or costs savings, but that this change is in particular a change to or even contrary to the usual custom of how those customers are treated and what they expect as baseline service and service quality, then that company should bear the costs of accommodating the transition in a way that respects its customers' basic human needs and humanity.
13. Koodo (TELUS) has not treated its customers with dignity nor respect and has forced upon them, against their will, a policy that favours only TELUS, with no accommodation of, or respect for, their customers who are purchasing an essential service from TELUS.

⁷ See Interventions Public process number: 2018-0429-5, CRTC file 8661-P8-201804295 - Public Interest Advocacy Centre - Application by Public Interest Advocacy Centre and National Pensioners Federation regarding paper billing by Koodo Mobile. Online: <https://services.crtc.gc.ca/pub/ListeInterventionList/Default-Default.aspx?en=2018-0429-5&dt=i&S=C&PA=t&PT=pt1&PST=a&lang=e> By our count, the comments supporting paper billing for Koodo customers outweighed those supporting TELUS by 70-4.

⁸ See Telecom Regulatory Policy 2016-496, *Modern telecommunications services – The path forward for Canada's digital economy*, at paras. 64, 131.

14. TELUS in their answer to this Petition will point to the 2006 Policy Direction to the CRTC, which the CRTC cited as central to its Koodo Decision, which instructs the CRTC, when considering policy objectives in the *Telecommunications Act*, to rely on “market forces” to the maximum extent possible.
15. TELUS likely will answer that it is but one provider of this essential service (retail wireless) and that its customers who may be unhappy with its sudden policy change without accommodating their needs could look to the market and switch accounts to another wireless service provider. This argument ignores again, however, the human needs and humanity of its customers. TELUS’ Koodo brand has long been marketed as a cheaper “flanker” brand to its flagship “TELUS” brand of retail wireless. The Koodo brand therefore attracted cost-conscious consumers. Many of these consumers are fixed-income seniors and persons with disabilities who rely to some extent on social assistance payments, as well as newer Canadians and students.

The CRTC Misinterpreted the Law to Avoid the 2019 Policy Direction

16. The present Canadian federal government soon realized, upon taking office, that the 2006 Policy Direction was one-sided and counterproductive. By instructing the regulator to consider market forces as a “trump-card” in interpreting the Act’s policy objectives, the 2006 Policy Direction effectively wrote any consumer needs or humanity considerations out of the *Telecommunications Act*. As a result, this government attempted to reverse the negative effects of the 2006 Policy Direction with a new Policy Direction in late February 2019. The 2019 Policy Direction instructed the CRTC in considering the Act’s policy objectives to give due weight to consumer protection in s. 1(a)(iv), which reads:

1 In exercising its powers and performing its duties under the *Telecommunications Act*, the Commission must implement the Canadian telecommunications policy objectives set out in section 7 of that Act, in accordance with the following:

(a) the Commission should consider how its decisions can promote competition, affordability, consumer interests and innovation, in particular the extent to which they

(iv) enhance and protect the rights of consumers in their relationships with telecommunications service providers, including rights related to accessibility,

17. In the Koodo Decision, the CRTC misinterpreted the law to state that its decision in this case was not “pending” when the new 2019 Policy Direction came into force.

18. Section 2 of the 2019 Policy Direction reads:

Effect of Order

Effect

- 2 This Order is binding on the Commission beginning on the day on which it comes into force and applies in respect of matters pending before the Commission on that day.

19. Section 3 of the 2019 Policy Direction reads:

Coming Into Force

Registration

3 This Order comes into force on the day on which it is registered.

20. This Order was registered on June 16, 2019 as P.C. 2019-803.

21. The proceeding before the Commission, a Part 1 Application by Petitioners PIAC and NPF, was “pending” before the CRTC on this day (that is, the Decision had not been yet rendered – it was rendered only on 3 March 2020, which, we note, was an egregious 21 (!) months after the initial application was filed by NPF-PIAC, and 19 months after the close of the record, for a process which is designed, when there are few procedural extensions, as was here, to have submissions completed within less than two months).

22. The plain legal meaning of “pending” is at any time prior to the Commission’s final decision is released.⁹

23. The CCC contends that CRTC wrongly interpreted the law and therefore did not consider the 2019 Policy Direction, which the government clearly intended it to do. We also contend that had the CRTC had to contemplate the 2019 Policy Direction, the Koodo Decision would have been different because of the direction to consider consumer protection in its section 1(a)(iv).

24. The CRTC’s Koodo Decision, however, in a footnote,¹⁰ takes a contrary position, with no argument, legal analysis or justification, that as the record of the proceeding had been considered “closed” by the Commission (meaning it would accept no new argument or evidence without a motion or leave to do so) that the matter was no longer “pending”. As shown, this is contrary to the caselaw which states the opposite.

25. We also submit that the Commission’s **extreme and unexplained delay** in deciding this application, which was completed in argument in less than 6 weeks, but took a year and nine

9 There is little Canadian caselaw on the meaning of “pending”. However, legal dictionaries such as Black’s Law Dictionary give this simple definition: “Begun, but not yet completed ; unsettled; undetermined ; in process of settlement or adjustment. Thus, an action or suit is said to be “pending” from its inception **until the rendition of final judgment**. *Wentworth v. Farmington*, 48 N. H. 210; *Mauney v. Pemberton*, 75 N. C. 221; *Ex parte Munford*, 57 Mo. 603.” Online: <https://thelawdictionary.org/pending/> [Emphasis added.]

10 Koodo Decision, footnote 9, para. 53.

months to write a decision for, should not then be used as a sword against the application of the 2019 Policy Direction. The CRTC should have to abide by the new rules as its tardiness was of its own making.

26. In addition, it would be absurd for the CRTC to take this position in law. If it applied to all its proceedings, the Commission then could not render a final decision after the record closed, as it was no longer seized with a matter, as it was no longer pending. The CRTC would therefore be *functus officio* after hearing a matter and closing its record as a procedural step. The record closing is simply a step in process to make administration of the proceeding fair and orderly. It does not wipe the case off the CRTC's docket for the purposes of, for example in this case, the government's ability to issue a Policy Direction on cases still before it. If this were otherwise, the CRTC would be able to be unaccountable to the government under the *Telecommunication Act*, s. 12 by simply taking procedural steps such as opening and closing the record and would risk de-jurisdictioning itself on its main function, which is adjudication. This is a ludicrous legal position that the CCC contends the CRTC purposely took in order to avoid the consumer protection requirements of the 2019 Policy Direction and its implications for the Koodo Decision.
27. For this reason alone, and for the contemptuous attitude to government and the legal confusion at the CRTC it betrays, Cabinet should rescind the Koodo Decision or at the least refer it back to the CRTC for decision in accordance with the 2019 Policy Direction.

Consumers Stated they Wanted, Needed and Expected Paper Bills

28. Consumers clearly stated in comments on the public record of NPF-PIAC's Koodo Application that they required paper billing either because:
- They cannot for various reasons access an electronic bill (age; handset, app and Internet/data abilities;¹¹ high cost of home Internet service;¹² lack of Internet in rural Canada;¹³ general lack of access to the Internet or to data on the phone

11 Intervention 23, Jeryn Daly: "I support Koodo and other wireless providers being required to provide a paper bill if customers ask. My 81 year old grandfather has a cellphone with Telus as he works by himself a lot and needs it in case of emergencies. He gets lost just trying to open his web browser, let alone trying to navigate something as complex as online billing. I am in full support of environmental efforts, but it's ridiculous to expect our seniors and aging population to be able to make the switch to paperless billing. Online:

<https://services.crtc.gc.ca/pub/DocWebBroker/OpenDocument.aspx?DMID=3160673>

12 Intervention 32, Marion Pollack: "Many seniors cannot afford access to the internet or have a computer. The fact that many utility companies want to do only paperless bills means that many seniors will be left in the lurch. Please donot allow this to happen". Online: <https://services.crtc.gc.ca/pub/DocWebBroker/OpenDocument.aspx?DMID=3841140>

13 Intervention 36, Shelly Porter: "I just had this problem today because I noticed I did not receive a bill in the mail. I live in a rural area and don't have internet other than on my phone. I do not use email on my phone it is old and it's unreliable and can't afford a knew one. I also can't keep track of my bills because I can't print them. They wanted to charge me 5 dollars to receive a paper bill ugh. This is

due to their plan, type of handset or its size or functionality; inability to access their online billing portal/app on their phone in particular; lack of training to access billing functions/apps; lack of, or difficulty using, a home computer in general or the data or Internet functions of their computer; lack of a home personal printer if needed;

- Disabilities: visual; physical; or cognitive;
- They rely on paper bills for record keeping,¹⁴ payment control, billing and account verification, CRA audit,¹⁵ note-taking and bill mark-up, bill dispute and redress purposes; or
- They wish to avoid harms associated with electronic access for billing, such as hacking, fraud and electronic access issues.

29. Consumers expect and have a right to control their bill-paying habits, whether this is for wireless bills or any other service. However, since wireless service now is an essential service, this importance is amplified. In short, the essential nature of wireless service demands a higher level of consumer control of billing. Effective consumer redress mechanisms cannot function without consumer choice of billing format.

30. Cabinet should reverse this decision, which is contrary to the facts and stretches the law so far from the spirit in which Parliament has legislated on the subject that the Koodo Decision effectively has reversed Parliamentary intent, which was to empower consumers against the unequal power of telecommunications providers to control billing.¹⁶

insane, I still use a teller at a bank. How am I helping the environment when I'll have to drive to get to a library. What happens when I can't drive, been there before." Online: <https://services.crtc.gc.ca/pub/DocWebBroker/OpenDocument.aspx?DMID=3161078>

14 Intervention 43, Marie-Ève Foley: "I want paper bills. I don't care for e-bills. From an accounting perspective I prefer paper as I keep the records in my Bill binder. I pay for services, I should be able to choose how I am billed. Furthermore, this isn't about being environmental, it is about them being cheap." Online:

15 Intervention 29, Greg Sheldon: "I am angry that Koodo has decided to end paper billing. Being self employed and requiring a cell phone for work, my understanding is that I need to keep paper records for no less than 7 years as per Revenue Canada and the potential for an audit. Koodo has done nothing to "save the trees" they've simply switched the onus to the individuals to print out the records - something that was provided for in the contract we signed onto. I'm excited to see this being formally objected but there is no question I will be leaving Koodo (whole family) if this is not reversed." Online: <https://services.crtc.gc.ca/pub/DocWebBroker/OpenDocument.aspx?DMID=3161284>

16 For example, see *Telecommunications Act*, s. 27.2: "Any person who provides telecommunications services shall not charge a subscriber for providing the subscriber with a paper bill." Cabinet should note that the CCC is not *per se* arguing that this provision was misconstrued as well in law by the CRTC, however, our position was that Parliament clearly intended paper bills to be provided to consumers, and that at no charge, and that it was assumed at that time (2014) by Parliament that of course WSPs would always provide paper bills. The scales have since fallen from our eyes.

Consumers who have no paper bills will be seriously harmed

31. Many consumers, despite having a cellphone, do not have a data plan or do not use their phone's data functions to access the Internet on their wireless phone for the reasons above. As they have no access to, nor a practical or effective way to use the Internet or data to produce a usable and intelligible copy of their monthly bill,¹⁷ they may not pay it due to not seeing it or remembering it is due (no notice), not pay on time, not pay the correct amount or even refuse to pay as an act of civil disobedience or consumer protest of their lack of paper billing. Such results will lead inevitably to late fees, including interest charges by their wireless providers and as consumers fall behind on their accounts – which they have not seen and have no practical access to – as well as collection efforts by WSPs (typically factored to collection agencies).¹⁸

Canadians are upset about losing paper bills and will vote for the party who promises to reinstate them and against parties that don't defend paper bills

32. Nearly 15% more seniors vote than the youngest voting cohort of Canadians.¹⁹

33. Seniors' lack of trust of telecommunications companies (see CRTC's Sales Practices Report,²⁰ which Cabinet ordered the Commission to undertake despite the CRTC's assurance that there was no problem with telecommunications sales,²¹ and which identified seniors as frequent targets of misleading sales practices) and in particular wireless companies and seniors' utter bewilderment that the CRTC let companies like TELUS take away their paper bills against their

17 Intervention 33, M MacDonald: "I too am a vulnerable Canadian who cannot afford internet service. I must attend the public library to use the internet (like now). I have been refused a paper bill for my Koodo service. If I notice what seems to be an error in the billed amount which they text to me, I must call the provider and ask them to explain my bill with nothing to reference, which puts me at a distinct disadvantage and is time consuming. Sometimes the agents will not explain things clearly and insist that the bill is correct, which I must then pay. I feel that if companies want to operate in Canada, they must provide customers with monthly statements in a form that is acceptable and useful to the customer. Asking customers to pay a bill which they cannot access and review is not reasonable. I don't trust giving Koodo a blank cheque. A monthly paper statement should be free of charge when requested." Online:

<https://services.crtc.gc.ca/pub/DocWebBroker/OpenDocument.aspx?DMID=3161076>

18 Intervention 45, Morgan Vallis: "Kodoo mobile out malicious remarks on my credit bureau due to their unwillingness to send me a paper bill. I requested multiple times and was never sent a bill. I paid my account blindly and wanted paper. No luck. Therefor they sent my account with a \$50 balance to Met Credit. The CCTS was toothless and totally pointless when trying to assist me. The privacy commissioner is now helping me get access to my information from Met Credit to confirm if ANYONE tried to contact me via paper or other method. Totally frustrating in 2018 a customer like myself with a near perfect credit score is thrown into a lower rating because of Koodo. Also, due to the fact the issue is in my bureau, I can't file in small claims against Koodo. Only a filing with the Supreme Court is allowed. How do I even do that ? The cost is ridiculous. Time for government intervention." Online: <https://services.crtc.gc.ca/pub/DocWebBroker/OpenDocument.aspx?DMID=3161599>

19 See Stats Canada, "Table 1 Voter turnout rates by age group, province and immigrant status, 2011, 2015 and 2019 federal elections". Online: <https://www150.statcan.gc.ca/n1/daily-quotidien/200226/t001b-eng.htm>

20 CRTC, "Report on Misleading or Aggressive Communications Retail Sales Practices" (20 February 2019). Online: https://crtc.gc.ca/eng/publications/reports/2018_246/

21 Telecom Commission Letter addressed to John Lawford (Public Interest Advocacy Centre) (12 February 2018). Online: <https://crtc.gc.ca/eng/archive/2018/lt180212.htm>

will, will create a strong longing for consumer redress and justice that will attach itself to whatever political party harnesses this energy and punish parties seen as complicit in this outrage. Given the very close Parliamentary races in the last election in many ridings, and in particular in several western provinces where (Koodo) TELUS use is high among seniors, Cabinet may wish to consider how best to satisfy these seniors with their consumer concerns.

34. NPF-PIAC believes that the Koodo Decision is a major one for consumers. All of the three major WSPs now have announced that they will, or actually have, migrated all of their “flagship” brands (Bell Mobility,²² TELUS Mobility²³ and Rogers²⁴) to electronic-only billing with no paper billing option (except for minor exceptions, such as persons with disabilities). This represents, now, a forced migration of millions and millions of Canadians to electronic billing.
35. NPF-PIAC therefore notes that it is imperative to signal to the CRTC, by granting this Petition, that the Cabinet and this government takes consumer rights in telecommunications seriously, as demonstrated by its 2019 Policy Directive, which the CRTC appears to have purposely sidestepped. It is also important that this Petition be granted to underline to the CRTC the importance of paper billing to consumers as it considers the wider issue of paper billing in all telecommunications and paid broadcasting services in Telecom Notice of Consultation 2020-81, *Call for comments – Provision of paper bills by communications service providers*.²⁵ Without this signaling, NPF-PIAC has no confidence that the CRTC will preserve paper billing for any of Canadians’ telecommunications or paid broadcasting services.

Conclusion and Relief Requested

36. NPF-PIAC **requests, for the reasons given above, that Cabinet grant our petition, and either RESCIND the decision or to refer it back to the CRTC for reconsideration with a direction to consider consumer rights to paper billing as a paramount requirement.**

End of Submission

²² Aisha Malik, MobileSyrup, “Bell to shift to paperless billing in 2020” (31 October 2019). Online: <https://mobilesyrup.com/2019/10/31/bell-paperless-billing/>

²³ Dean Daley, MobileSyrup, “Telus to transition all customers to paperless e-bills” (18 September 2018). Online: <https://mobilesyrup.com/2018/09/18/telus-paperless-e-bills-canada/>
<https://mobilesyrup.com/2018/09/18/telus-paperless-e-bills-canada/>

²⁴ The Wire Report, “Rogers to move to paperless billing” (11 March 2020). Online subscription required.

²⁵ Online: <https://crtc.gc.ca/eng/archive/2020/2020-81.htm> See also: <https://crtc.gc.ca/eng/archive/2020/2020-81-1.htm>