



PUBLIC INTEREST ADVOCACY CENTRE  
LE CENTRE POUR LA DÉFENSE DE L'INTÉRÊT PUBLIC

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CONSUMERS' ASSOCIATION OF CANADA  
Association des consommateurs du Canada

July 28, 2014

Mr. Jean-Pierre Blais  
Chairman  
Canadian Radio-Television and  
Telecommunications Commission  
Ottawa, ON  
K1A 0N2

BY E-MAIL  
PUBLICLY POSTED TO WWW.PIAC.CA

**Re: Charges for paper billing made by Telecommunications Providers and  
Broadcasting Distribution Undertakings – Actions of the Commission**

Dear Mr. Blais:

We are writing to you today on behalf of the Public Interest Advocacy Centre and the Consumers' Association of Canada to express our profound concern with the actions of the Commission in "closing" our formal application to prohibit telecommunications carriers' practice of billing for paper invoices, and instead convening what appears to be a private "settlement" meeting between the Vice-Chairs of Broadcasting and of Telecommunications and the industry.

Both actions are highly unfair and prejudicial to our members' interests and to the interests of Canadian consumers at large.

These actions unfortunately convey a very different message to Canadians than you outlined in your early speeches, including one at PIAC's Annual Dinner 2012, where you said: "As you probably know, since my return to the CRTC, I've invited staff and colleagues to sharpen the Commission's focus on the public interest—putting Canadians at the centre of their communication system."<sup>1</sup> A private, behind-closed-doors meeting with only the industry to

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<sup>1</sup> Speech by Jean-Pierre Blais, Chairman, Canadian Radio-television and Telecommunications Commission to the Public Interest Advocacy Centre's Annual Dinner, Ottawa, Ontario, November 30, 2012, online: <http://www.crtc.gc.ca/eng/com200/2012/s121130.htm>

determine whether and what Canadians will pay for a simple paper copy of their communication bills – that they then have the joy of paying – says quite clearly that the CRTC puts Canadians outside in the cold.

In addition, dismissing our formal complaint without any notice nor opportunity to defend its requests takes a powerful advocate away from the average Canadian, and in particular vulnerable Canadians. We have no confidence that the formal requests in our complaint will be raised by the Commission in the closed-door meeting nor that the arguments we made and would have made about the cost of this practice to consumers will be seriously addressed.

PIAC has prepared an estimate of present communications industry-wide revenues for an upcoming report. However, we will give you the punchline: \$600 million a year. That's what we estimate Canadians presently pay the industry for paper bills. And if the "agreement" reached at this private meeting blesses the practice, those companies that presently do not charge may begin charging – so even if the amount per bill is lowered, this tab could actually go up.

Finally, we deplore the basic unfairness of the communications companies involved effectively penalizing Canadians for not taking internet access (which they sell) when customers may only have, and only want, for example, wireline telephone or cable TV service.

Silencing public advocates and holding private meetings to dispose of real consumer problems is not what you promised the Commission would do. We ask that you set this right or explain to Canadians how the Commission is putting them at the centre of their communications system.

Yours truly,

*(Original signed)*

John Lawford  
Executive Direction and General Counsel  
PIAC

*(Original signed)*

Bruce Cran  
President, Consumers' Association of Canada

cc: Mr. John Traversy, Secretary General, CRTC  
Mr. Thomas Pentefountas, Vice-Chairman, Broadcasting, CRTC  
Mr. Peter Menzies, Vice-Chairman, Telecommunications, CRTC  
Ms. Barbara Motzney, Chief Consumer Officer, CRTC  
Mr. Steven Harroun, Acting Director General, Strategic Policy, CRTC

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