Intervention of the Canadian Anti-Monopoly Project (CAMP)

Telecom and Broadcasting Notice of Consultation CRTC 2025-227

Consumer protections in the event of a service outage or disruption

November 13, 2025

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EXECUTIVE SUMMARY

ES-1. Telecommunications service outages disrupt millions of Canadians' daily lives, affecting work, safety, social connections, and access to essential services. Despite the critical importance of reliable connectivity, Canadian consumers currently lack adequate protections when service fails.

ES-2. The Canadian Anti-Monopoly Project (CAMP) is a non-profit think tank dedicated to promoting fair and competitive markets that work for Canadians. CAMP participates in this proceeding to ensure that consumer protection measures advance both consumer interests and fair competition, consistent with the 2023 Policy Direction's emphasis on competition and consumer interests.

ES-3. CAMP welcomes the Commission's examination of consumer protections during service outages through this proceeding. While rates and general marketplace competitiveness are appropriately out of scope, the design of consumer protection measures can materially affect competitive outcomes through transparency, accountability, and fair treatment—particularly for wholesale competitors.

Key Findings

ES-4. **Current protections are insufficient.** No mandatory compensation exists, TSPs face no communication requirements, and vulnerable populations lack enhanced protections. The July 2022 Rogers outage—affecting 12+ million customers for 15+ hours with 9-1-1 disruptions—demonstrated these gaps.

ES-5. **Wholesale markets face systematic information asymmetries.** Evidence from prior proceedings shows wholesale competitors receive inadequate outage information from facilities-based carriers, preventing equivalent customer service.

ES-6. **Vulnerable populations experience disproportionate harm.** Canada's video relay service (VRS), TTY relay, and IP relay are each operated by single providers—when any platform experiences an outage, every deaf, hard of hearing, or deafblind Canadian dependent on that service loses all ability to make or receive calls, including 9-1-1 and 988 emergency services. This single-provider monopoly creates mission-critical vulnerability

where even brief outages leave an entire population without communication alternatives. Deaf organization submissions emphasize that while outages "can be disconcerting for hearing people," hearing Canadians can "gather information through unfettered verbal interactions from various sources including the radio"—options unavailable to those with hearing loss, who therefore "experience more distress than normal during an outage." Rural customers face longer restoration times with fewer alternatives, and low-income consumers cannot afford backup options.

ES-7. **International precedents demonstrate both successful and failed approaches.** The UK and EU have implemented comprehensive mandatory automatic compensation frameworks covering landline, mobile, and broadband services. Australia's experience provides a cautionary tale: its Customer Service Guarantee (CSG) applies automatic compensation ($14.52-$48.40 AUD/day) only to fixed voice services used by 36% of Australians, while the 63% relying on mobile and 8 million broadband connections receive no statutory compensation. The Australian government's 2023 thematic review explicitly questioned whether the CSG "remains relevant and useful," noting it has "not significantly changed in character since 1997" despite dramatic market transformation. Canada should adopt the comprehensive UK/EU model, not Australia's acknowledged-as-obsolete voice-only approach.

Framework for Consumer Protection

ES-8. CAMP recommends a comprehensive framework balancing consumer interests, fair competition, and implementation feasibility:

Consumer Transparency and Comparability

ES-9. Standardized public disclosure of outage metrics enables consumers to compare provider reliability when making purchasing decisions, strengthening competitive discipline without rate regulation. TSPs should publish provider- and region-level performance indicators, incident counts by severity, and historical data.

Fair Competition in Wholesale Markets

ES-10. Facilities-based carriers must provide timely outage notifications to wholesale competitors. Current practices create information asymmetries that disadvantage smaller competitors and their customers. CAMP recommends mandatory initial notice within 30-60 minutes, regular status updates, estimated restoration times, and standardized data feeds.

Automatic Refund Framework

ES-11. Automatic refunds protect all consumers, particularly vulnerable populations who may not have the opportunity to proactively request and advocate for compensation. The framework should include pro-rated calculation based on service fees and duration, graduated enhancement tiers for extended outages (4-6 hours triggering initial refunds, with increasing multipliers for longer outages), and automatic bill credit application.

Enhanced Protections for Vulnerable Populations

ES-12. Enhanced protections reflect disproportionate impacts on persons with disabilities, rural customers, low-income consumers, and those with medical needs. For accessibility relay services specifically (VRS, TTY relay, IP relay), deaf organizations recommend a 15-minute outage threshold given single-provider monopoly structure and emergency service access requirements. Outage communications must be provided in ASL and LSQ video formats, not just text—the Accessible Canada Act recognizes sign languages as "primary languages for communication by deaf persons in Canada," distinct from written English or French. For general outages affecting persons with disabilities, enhanced protections include lower duration thresholds (2-4 hours vs. 4-6 hours), higher compensation multipliers, prioritized restoration, and alternative access during prolonged outages.

Implementation and Enforcement

ES-13. CAMP recommends implementing protections through amendments to existing Consumer Protection Codes with phased timelines (3-18 months), scaled obligations for smaller providers where appropriate, robust compliance monitoring through quarterly TSP reporting, and administrative monetary penalties for non-compliance.

Summary of Recommendations

ES-14. CAMP respectfully requests that the Commission:

- Find that current consumer protections during service outages are insufficient and that mandatory requirements are necessary;
- Require standardized, public outage disclosure metrics to enable consumer comparison and strengthen market discipline;
- Mandate timely outage notifications from facilities-based carriers to wholesale competitors to ensure fair competition;
- Establish an automatic refund framework with clear calculation rules and graduated tiers;
- Implement enhanced protections for vulnerable populations with prioritized restoration and alternative access provisions;
- Adopt robust compliance monitoring and enforcement mechanisms including quarterly reporting and administrative monetary penalties; and
- Commit to a comprehensive review within 2-3 years to assess effectiveness and make necessary adjustments.

ES-15. These measures will protect consumers during outages while strengthening competitive outcomes through transparency, accountability, and fair treatment across all market participants. The framework balances consumer interests, fair competition,

implementation feasibility, and regulatory accountability in accordance with the 2023 Policy Direction.

INTRODUCTION

1. The Canadian Anti-Monopoly Project (CAMP) files this intervention in response to Telecom and Broadcasting Notice of Consultation CRTC 2025-227, issued on September 4, 2025, regarding consumer protections in the event of telecommunications service outages or disruptions (the "Notice").[1]

2. CAMP is a non-profit think tank dedicated to promoting fair and competitive markets that work for Canadians. CAMP conducts research, public education, and policy advocacy on competition, antitrust, and regulatory issues affecting Canadian consumers and businesses. CAMP's telecommunications work focuses on promoting competitive outcomes, reducing barriers to entry for new competitors, and advancing consumer protections that strengthen competitive dynamics.

CAMP's Interest in This Proceeding

3. CAMP has a direct interest in this proceeding for several reasons relating to both consumer protection and competitive market structure.

4. Service outages create significant consumer harms, including economic losses from work-from-home disruption and lost business revenues, safety risks from loss of emergency service access and inability to contact family, social isolation particularly for vulnerable populations, and disruption to essential services. Robust consumer protections—including transparent disclosures, proactive communication, and fair compensation—are fundamental to consumer interests and align with CAMP's mandate to ensure markets work for Canadians.

5. While the Commission has appropriately placed rates and general marketplace competitiveness arguments out of scope,[2] consumer protection measures affect competitive dynamics in several important ways. Standardized outage disclosures enable consumers to compare providers on reliability metrics, strengthening competitive discipline. Current practices create systematic disadvantages for wholesale competitors, mobile virtual network operators (MVNOs), and wholesale Internet Service Providers (ISPs), preventing them from providing equivalent customer service to facilities-based carriers. Refund and compensation frameworks must be designed to avoid disproportionately burdening smaller competitors or creating regulatory barriers to entry. Effective enforcement ensures

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[1] Telecom and Broadcasting Notice of Consultation CRTC 2025-227, Consumer protections in the event of a service outage or disruption, 4 September 2025 [hereinafter "Notice"].

[2] Notice, at para. 14.

all providers—including dominant incumbents—face meaningful consequences for service failures.

6. Submissions from prior proceedings incorporated into this record reveal significant gaps in outage information flows from facilities-based carriers to wholesale competitors. Wholesale competitors report receiving no real-time diagnostic tools or monitoring capabilities, experiencing delayed or absent notifications of unplanned outages, having limited access to restoration estimates or status updates, and facing complete dependence on facility owners for all customer communication.[3] These information asymmetries prevent smaller competitors from providing equivalent service to their customers, creating structural competitive disadvantages unrelated to operational efficiency or service quality.

7. CAMP submits that consumer protection measures designed with competitive impacts in mind can advance multiple Policy Direction objectives: competition through transparency and reduced information asymmetries, affordability through automatic refunds and competitive pressure on reliability, consumer interests through clear communication and fair compensation, and innovation through standardized metrics and lower barriers to entry.[4] CAMP's participation ensures that the intersection of the public interest and competition receive appropriate consideration in the design of consumer protection frameworks while maintaining focus on consumer interests outcomes.

PART I – NEED FOR CONSUMER PROTECTIONS

Current Gaps in Consumer Protection (A2-Q1)

8. CAMP submits that significant gaps exist in current consumer protections during telecommunications service outages. Unlike many international jurisdictions, Canadian consumers have no guaranteed right to compensation for service outages. TSPs face no mandatory obligations to notify customers of outages or provide restoration updates. Wholesale competitors receive inadequate information from facilities-based carriers, preventing them from serving their own customers effectively.[5] Vulnerable populations face disproportionate impacts without corresponding enhanced protections. Consumers cannot compare provider reliability due to lack of standardized disclosure, and current voluntary measures lack effective enforcement mechanisms.

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[3] TekSavvy, CNOC, and ITPA submissions, TNC 2022-147 and TNC 2023-39 (incorporated into the record).

[4] Order Issuing a Direction to the CRTC on a Renewed Approach to Telecommunications Policy, SOR/2023-23, 10 February 2023 [hereinafter "2023 Policy Direction"].

[5] See detailed analysis in Part VI below.

Evidence from the Rogers July 2022 Outage

9. The Rogers network outage of July 8, 2022 demonstrated critical gaps in consumer protections:[6]

- **12+ million customers** lost service for 15+ hours
- **9-1-1 emergency services** disrupted across affected areas
- **No automatic compensation** initially provided
- **Limited customer communication** during the outage
- **Vulnerable populations** faced heightened safety risks

While Rogers eventually provided voluntary credits, the discretionary nature of this response—requiring customer awareness and requests—highlights the need for mandatory automatic protections.

Consumer Harms from Service Outages (A2-Q2)

10. Service outages create multiple categories of consumer harm that extend far beyond inconvenience.

11. **Economic losses** include work-from-home disruption preventing Canadians from earning income, lost business revenues for small enterprises, missed transactions, and inability to access funds when payment systems go offline. These impacts fall most heavily on small businesses and gig economy workers lacking infrastructure redundancy.

12. **Safety risks** represent the most severe harm. 9-1-1 disruptions can mean the difference between life and death. Inability to contact family during emergencies creates acute stress and danger, particularly for parents with children in different locations or family members caring for elderly relatives. Disruption of medical monitoring services threatens individuals dependent on connected health devices.

13. **Social isolation** affects all consumers but becomes particularly acute for vulnerable populations. For individuals relying on telecommunications as their primary means of social connection, extended service loss results in complete isolation from family, friends, and support networks.

14. **Accessibility barriers** create complete communication loss for users dependent on message relay service (MRS) and video relay service (VRS). Unlike hearing users with alternative communication methods, persons with disabilities dependent on

[6] Report on the Rogers Service Outage of July 8, 2022, Canadian Radio-television and Telecommunications Commission, February 2023, Executive Summary ss. 3.1-3.2.

these services face total inability to communicate when services fail. Evidence from prior proceedings confirms these widespread impacts.[7]

Disproportionate Impacts on Vulnerable Populations (A2-Q3)

15. Evidence demonstrates that vulnerable populations experience disproportionate harm from service outages.

16. **Persons with disabilities** relying on MRS or VRS face complete communication loss when these services fail.[8] Unlike other consumers with alternative methods, users dependent on relay services have no functional alternatives—the service is essential for all communication, including emergencies.

17. **Rural and remote residents** face systematically longer restoration times due to structural barriers. Evidence from prior proceedings demonstrates that rural challenges stem from: (1) **geographic impossibility of network duplication**—competitors cannot realistically reproduce facilities "spanning thousands of kilometres of rough northern terrain";[9] (2) **transport facility monopolization**—"widespread lack of competitive transport options" creates "particularly acute" severity when limited facilities fail;[10] (3) **small provider resource constraints**—rural providers must adopt "all hands on deck" approaches, diverting "scarce human resources" to restoration;[11] and (4) **single-provider dependency** in many rural communities.[12] Longer restoration times plus fewer alternatives creates compounding disadvantage the Commission has recognized as limiting rural residents' "living standards."[13]

18. **Low-income consumers** cannot afford backup services—secondary internet connections, mobile hotspots, or temporary relocation. While higher-income

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[7] TSP submissions, TNC 2023-39 (incorporated into the record).

[8] DHH Coalition (DAANS, NLAD, and OAD), Intervention, TNC 2023-39, 24 March 2023, at paras. 13, 16-17.

[9] Competitive Network Operators of Canada (CNOC), Intervention, TNC 2022-147, 6 October 2022, at paras. 76-77.

[10] CNOC, Intervention, TNC 2023-39, 24 March 2023, at para. 22.

[11] Independent Telecommunications Providers Association (ITPA), Intervention, TNC 2023-39, 24 March 2023, at para. 9.

[12] CNOC, Intervention, TNC 2022-147, 6 October 2022, at para. 71 (citing TNC 2022-147 at para. 25).

[13] CNOC, Intervention, TNC 2022-147, 6 October 2022, at paras. 89-90 (citing Commission findings at TNC 2022-147 paras. 68-71).

consumers can purchase redundancy, low-income Canadians must endure the full impact of service loss.

19. **Customers with medical needs** require reliable connectivity for health monitoring devices, telehealth appointments, and emergency communication. Outages can force medication errors, missed critical appointments, and inability to report medical emergencies.

International Precedents (A2-Q4)

20. Multiple jurisdictions have implemented mandatory consumer protections for service outages, demonstrating both feasibility and effectiveness.

21. **United Kingdom.** Ofcom's automatic compensation scheme, operational since 2019, requires providers to pay automatically without customer claims:[14]

    - £8 per day for loss of service after 2 days
    - £5 per day for delayed installation or repairs
    - £25 for missed technician appointments

    Evidence shows over 5 million UK subscribers lose service annually, yet only 15% received credits before automatic compensation. The scheme proves that mandatory per-day credits are administratively feasible and meaningful for consumers.

22. **European Union.** The European Electronic Communications Code establishes comprehensive consumer protections:[15]

    - **Article 106:** Mandatory compensation when switching or installation exceeds one working day, when service loss occurs during switching, or when appointments are missed
    - **Article 107:** Consumers may terminate entire bundles when any component service fails
    - **Article 108:** Requires "fullest possible availability" of voice and internet during catastrophic failures, including uninterrupted emergency service access
    - **Contract transparency:** All contracts must spell out compensation arrangements, including for security incidents (Recitals 263-264, 282)

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[14] Ofcom, *Automatic Compensation: Protecting consumers from service quality problems*, Statement, 2017.

[15] Directive (EU) 2018/1972 establishing the European Electronic Communications Code, at Article 106, Article 107, Article 108, Recitals 263-264, 282.

23. **Australia.** Australia's compensation framework demonstrates the risks of narrow scope and regulatory stagnation. The **Customer Service Guarantee (CSG) Standard 2023** provides statutory compensation for connection delays, service outages, and missed appointments:[16]

- **Residential/charity:** AUD $14.52/day (first 5 days), then $48.40/day (≈ CAD $12.78-$42.59)
- **Business:** AUD $24.20/day (first 5 days), then $48.40/day (≈ CAD $21.30-$42.59)
- **Missed appointments:** AUD $14.52-$24.20 per incident

24. However, the CSG framework suffers from critical limitations the Australian government has explicitly acknowledged:[17]

- **Obsolete scope:** Applies only to fixed voice services, which serve merely 36% of Australians, while 63% rely solely on mobile and 8 million premises have broadband—neither covered by CSG
- **Widely waived:** "Most providers of voice services now seek CSG waivers from new customers," except Telstra bound by Universal Service Obligations
- **Wrong regulatory target:** Retail-focused CSG fails because "most key activities associated with connection and repair… are now largely controlled in practice by NBN Co and other [wholesale operators], rather than [retail providers]"
- **Under fundamental review:** February 2023 thematic review questioned whether CSG "remains relevant and useful," noting it has "not significantly changed in character since 1997"

25. For mobile, NBN internet, and VoIP services, Australia relies on the **TCP Code C628:2019**, which provides process requirements (billing discipline, automatic usage alerts at 50/85/100%, financial hardship protocols, switching transparency) but **no automatic statutory compensation**.[18]

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[16] Telecommunications (Customer Service Guarantee) Standard 2023, F2023L01140, registered 30 August 2023, Sched. 2 Pt. 2, items 201-205.

[17] Australian Department of Infrastructure, Transport, Regional Development, Communications and the Arts, *Thematic Review of the Customer Service Guarantee (CSG)—Consultation Paper*, February 2023, at pp. 4, 6, 8, 11, 17.

[18] Australian Communications and Media Authority, Telecommunications Consumer Protections Code C628:2019, at Clauses 5.2-5.6, Clause 6.5, Chapter 7, Chapter 9.

26. These international frameworks demonstrate fundamentally different approaches. The UK and EU mandate comprehensive automatic compensation covering all telecommunications services—landline, mobile, and broadband. Australia's CSG provides compensation amounts comparable to UK rates for the narrow category of landline services, but its critical flaw is **exclusion of the services consumers actually use**. The Australian government's own 2023 review acknowledged this fundamental inadequacy, stating that expanding CSG to broadband "would be a significant advance for consumers" because "broadband services support more uses than simple voice."[19]

27. Canada faces a choice: Adopt the comprehensive UK/EU model covering all essential telecommunications services or repeat Australia's acknowledged mistake of protecting only legacy technology while leaving mobile and internet users without statutory compensation. The UK and EU models—proven effective, comprehensive in scope, and truly automatic in application—provide the appropriate precedent. Australia's experience demonstrates exactly why voice-only frameworks fail in modern markets.

Regulatory Rationale for Intervention

28. CAMP submits that regulatory intervention is justified based on fundamental market structure considerations. Information asymmetries and switching costs prevent effective market discipline, as consumers cannot easily compare provider reliability or switch providers in response to poor outage performance. The essential service nature of telecommunications creates dependency that leaves consumers vulnerable when service fails. A level playing field requires consistent obligations across all providers to ensure fair competition. Consumer protections advance the 2023 Policy Direction objectives of competition, affordability, and consumer interests.[20]

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[19] Australian Department of Infrastructure, Transport, Regional Development, Communications and the Arts, *Thematic Review of the Customer Service Guarantee (CSG)—Consultation Paper*, February 2023, at pp. 4, 6, 8, 11, 17.

[20] Order Issuing a Direction to the CRTC on a Renewed Approach to Telecommunications Policy, SOR/2023-23, 10 February 2023 [hereinafter "2023 Policy Direction"].

PART II – SCOPE AND NATURE OF PROTECTIONS

A. Services and Customers Covered

Services to be Covered (A2-Q5, A2-Q9)

29. CAMP submits that consumer protections should apply to all telecommunications services, with appropriate variations based on service characteristics and consumer dependency.

30. **Internet services** should receive the strongest protections given their essential nature for work, education, healthcare, and social participation. The COVID-19 pandemic demonstrated internet connectivity is now a necessity for full participation in Canadian society.

31. **Wireless services** including voice and data should receive protections equivalent to internet services. Mobile services increasingly serve as primary or sole connectivity for many Canadians. The mobility makes them essential for personal safety and emergency communication.

32. **Wireline voice services**, while declining in adoption, require strong protections particularly for vulnerable populations without alternatives. Many seniors and persons with disabilities depend on traditional telephone services and may lack mobile devices or internet access.

33. **Television and BDU services** occupy a different category, being less critical than communication services. However, these services should still receive basic protections including notification and refunds, as television provides access to news and emergency information.

34. This service-appropriate approach recognizes different consumer dependencies while ensuring comprehensive coverage. The framework should be graduated rather than one-size-fits-all, allowing protections to match the severity of harm when each service type fails.

Customer Categories (A2-Q6, A2-Q13)

35. Consumer protections should apply comprehensively across customer types with limited exceptions based on negotiated alternative protections.

36. **Residential customers** should receive full protections across all services. These customers have no specialized expertise, limited bargaining power, and no ability to negotiate service level agreements.

37. **Small business customers** should receive full protections, recognizing their similar vulnerability to residential consumers. Small businesses lack market power, typically cannot negotiate SLAs, and face potentially greater financial harm from outages disrupting revenue-generating activities. The CCTS has long recognized small businesses require consumer-style protections.

38. **Enterprise customers with comprehensive SLAs** may be excluded where agreements provide equivalent or superior protections. Large organizations with specialized expertise and market power can negotiate customized service levels. However, any exclusion should be conditional—enterprise customers without adequate SLAs should fall under the regulatory framework.

39. **Wholesale competitors** require special treatment to ensure fair competition. Part VI addresses these considerations in detail, but the fundamental principle is that end customers should receive identical protections regardless of whether their provider is facilities-based or operates through wholesale arrangements.

40. **Small business** should be defined consistent with existing Consumer Protection Codes and CCTS standards: average monthly telecommunications bill under $2,500. This established definition ensures consistency across regulatory frameworks.

B. Duration Thresholds and Causation

Duration Thresholds (A2-Q7, A2-Q2)

41. CAMP recommends graduated thresholds based on protection type and the escalating severity of consumer harm as outages extend.

42. **Communication requirements:**

- **Initial notification:** 1-2 hours after outage detection
- **Regular updates:** Every 4-6 hours thereafter
- **Rationale:** Minimal provider burden while meeting critical consumer information needs

43. **Refund obligations:**

- **Standard customers:** 4-6 hours (harm becomes financially material)
- **Vulnerable populations:** 2-4 hours (recognizes disproportionate dependency)
- **Rationale:** Evidence-based thresholds reflecting differential harm levels

44. **Enhanced protections (alternative access):**

- **Trigger point:** 24 hours
- **Solutions:** Mobile cell on wheels (COW), temporary satellite connectivity
- **Rationale:** Extended duration justifies temporary infrastructure deployment

45. Thresholds should be cumulative over rolling periods rather than requiring continuous outage to prevent gaming through intermittent service restoration. A

provider that restores service for 30 minutes every few hours to reset outage timers while leaving customers unable to use the service meaningfully should not escape obligations through such manipulation.

46. The definition of "outage" or "disruption" should include both complete service loss and severe degradation. Service reduced to 75-90% capacity loss should be treated as a full outage, as such degradation renders the service effectively unusable for most purposes. Service degradation of 50-75% should receive partial protections, recognizing material though not complete loss of functionality. These thresholds ensure that significant service quality problems trigger appropriate responses while avoiding obligations for minor fluctuations.

Causation Considerations (A2-Q6, A2-Q9)

47. Consumer protections should apply regardless of outage cause, though graduated responses may be appropriate based on the degree of provider control.

48. For TSP-controlled factors such as equipment failures, configuration errors, capacity planning failures, or maintenance mistakes, full protections should apply including maximum refund tiers. These are within the provider's operational control and represent failures for which the provider bears full responsibility.

49. For third-party factors such as fiber cuts by construction crews, power grid failures, or upstream provider failures, standard protections should apply though refund amounts may be adjusted. From the consumer perspective, service loss creates harm regardless of which party caused the problem. Consumers cannot be expected to absorb losses due to provider supply chain management issues.

50. For force majeure events including natural disasters, acts of war, or catastrophic infrastructure damage beyond reasonable prevention, communication obligations should remain paramount to keep affected populations informed. Refund calculations may be limited to service charges without enhancement multipliers, recognizing extraordinary circumstances beyond ordinary operational control. However, even in force majeure situations, consumers have lost service they paid for and deserve baseline compensation.

51. The fundamental principle is that consumers should not bear the risk of service failure regardless of cause. Service providers are in the superior position to manage supply chain risks, maintain redundancy, and recover costs through insurance. Shifting outage risk to consumers through causation-based exemptions would undermine the consumer protection objectives of this proceeding.

C. Planned vs. Unplanned Outages

Different Treatment Required (A2-Q7, A2-Q4)

52. Different protections should apply based on outage type, reflecting the material difference between anticipated service interruptions and unexpected failures.

53. Planned outages should require advance notice of minimum 5 business days, providing consumers time to make alternative arrangements. Scheduling should occur during low-impact hours such as overnight periods to minimize disruption. Duration should be limited to the minimum necessary to complete required work. Generally, no refunds should apply for planned outages that remain within the announced timeframe, as consumers have been given notice and can plan accordingly. However, if planned maintenance exceeds the announced duration or timing, the overrun period should trigger standard outage protections.

54. Unplanned outages should trigger the full protection suite including proactive notification, regular updates, automatic refunds, and enhanced protections for vulnerable populations. These unexpected failures leave consumers without warning and unable to arrange alternatives, justifying comprehensive protections.

55. Emergency maintenance presents an intermediate category. While technically involving provider action rather than unexpected equipment failure, emergency maintenance cannot be scheduled with the advance notice periods applicable to planned work. CAMP submits that emergency maintenance should be treated the same as unplanned outages for consumer protection purposes. The inability to provide advance notice means consumers face the same unplanned disruption as in equipment failure scenarios, justifying equivalent protections.

PART III – REFUND AND COMPENSATION FRAMEWORK

A. Mandatory Automatic Refunds

Automatic Application Required (A2-Q11, A2-Q14(f))

56. CAMP strongly supports mandatory automatic refunds for qualifying outages. Automatic application is essential for three reinforcing reasons.

57. **Consumer protection.** Many consumers—particularly vulnerable populations—cannot proactively request refunds due to lack of awareness, difficulty navigating complaint processes, language barriers, disability needs, or lack of time. Requiring requests systematically disadvantages those least able to advocate for themselves.

58. **Administrative efficiency.** Request-based systems require customer service infrastructure, documentation, dispute resolution, and individual payment processing. Automated systems using existing billing infrastructure eliminate these costs. Evidence from international jurisdictions demonstrates automatic systems are both feasible and less costly.

59. **Incentive alignment.** When every affected customer automatically receives compensation, providers face direct financial incentives for rapid restoration. Request-based systems allow providers to avoid compensation for customers who do not file claims. Automatic systems ensure the full financial impact falls on the provider, maximizing restoration urgency.

60. TSPs should be explicitly prohibited from requiring customers to request refunds for qualifying outages. Any process that places the burden on consumers to claim entitled compensation defeats the automatic nature of the framework and should be impermissible.

61. The technical feasibility of automatic refunds is well established. Evidence from SaskTel demonstrates that TSPs can detect and track outages for specific customers, with SaskTel posting planned outages internally within 30 minutes.[21] While initial system development may require 6-12 months for full automation, the technical capability exists to identify impacts to specific customers. The Commission should require TSPs to develop necessary detection capabilities within the implementation timeline as a core system requirement rather than optional enhancement.

B. Calculation Methodology

Base Calculation and Graduated Tiers (A2-Q12, A2-Q14(a)-(d))

62. Refunds should be calculated using a transparent methodology that balances consumer compensation with service restoration incentives.

63. The base calculation should use a pro-rated portion of monthly service fees based on outage duration: daily rate multiplied by days affected. This approach:

- Ties compensation directly to service value lost
- Provides easily understood calculations consumers can verify
- Scales automatically with service pricing
- Requires no separate compensation schedules

Example: A customer paying $90/month for internet service has a daily value of $3. A 12-hour outage represents $1.50 in lost service value.

64. Graduated enhancement through multipliers reflects increasing consumer harm as outages persist. CAMP recommends:

Duration	Multiplier	Approximate Credit
4-24 hours	1x daily rate	1 day
24-48 hours	3x daily rate	3-4 days
48-72 hours	7x daily rate	1 week

[21] SaskTel, Response to Request for Information, TNC 2025-227, Appendix 1, Question 2, 9 October 2025.

Duration	Multiplier	Approximate Credit
72+ hours	Full monthly credit	Minimum 1 month

65. This graduated approach balances multiple objectives. The escalating multipliers create strong incentives for rapid restoration by increasing the financial impact as outages extend. Compensation levels acknowledge that harm compounds over time—a 48-hour outage causes more than double the harm of a 24-hour outage as consumers miss additional work, appointments, and essential activities. The structure avoids excessive penalties for short service interruptions while ensuring meaningful compensation for extended failures. International precedents including the UK scheme demonstrate that similar graduated frameworks function effectively in practice.

66. CAMP opposes caps on individual customer refunds for several reasons. Caps reduce restoration incentives for prolonged outages by limiting the financial consequences of extremely long service failures. Outages that persist beyond 3-4 days create cumulative consumer harm that justifies higher compensation—capping refunds would leave consumers bearing uncompensated losses. Prolonged outages often indicate serious systemic problems that require maximum restoration urgency, yet caps would remove the financial incentive exactly when it is most needed.

67. Force majeure events may justify modified refund calculations limited to service fees without enhancement multipliers. In extraordinary circumstances such as major natural disasters, wildfire destruction of infrastructure, or other catastrophic events beyond reasonable prevention or control, the full graduated enhancement tiers may impose unreasonable burden. However, even in force majeure situations, consumers have paid for service they did not receive and deserve at minimum the return of service charges for the affected period.

Service-Specific Considerations (A2-Q13, A2-Q14(e))

68. Different services require tailored approaches that reflect their varying criticality and consumer dependency.

69. Internet and wireless services should receive the full framework as described above, given their essential nature. These services support work, education, healthcare, social connection, and emergency communication. The multiplier tiers should apply without reduction, ensuring that extended internet or mobile outages trigger substantial compensation matching the severity of harm to modern life.

70. Voice services should receive enhanced multipliers for vulnerable populations dependent on voice communication, particularly seniors who may lack alternative means of communication and persons with disabilities for whom voice service

represents primary access to emergency services. While voice service usage has declined generally, it remains critical infrastructure for specific populations justifying enhanced protection.

71. Television services should receive lower multipliers reflecting their reduced essential nature. While TV service outages cause inconvenience and loss of paid service value, they rarely create the safety, economic, or social harms associated with communication service failures. CAMP recommends multipliers set at 50% of internet service levels for television outages, providing meaningful compensation while recognizing the reduced criticality.

72. Bundled services require pro-rated allocation to determine which portion of the customer's total bill relates to the affected service. The preferred allocation method uses standalone service prices to determine affected service value. For example, if a customer pays $120 monthly for a bundle where internet would cost $90 standalone, TV $40, and phone $30 (total $160 standalone), the pro-rated allocation would be internet 56%, TV 25%, and phone 19%. This approach reflects actual service values rather than arbitrary percentages.

73. Where standalone prices are unavailable for specific services in a bundle, alternative percentage allocation should apply. CAMP recommends default allocations of internet 50%, TV 30%, and phone 20% for triple-play bundles, and internet 65%, TV 35% for dual-play bundles, based on typical market service values. These defaults ensure compensation can be calculated even for highly customized bundle offers.

C. Implementation Mechanisms

Application Methods (A2-Q14(b), A2-Q14(g)-(h), A2-Q15)

74. Refunds should be implemented through methods that maximize accessibility and minimize barriers to consumers receiving compensation.

75. The primary method for most customers should be automatic bill credit on the next invoice following the outage. This approach leverages existing billing systems, requires no consumer action, provides clear visibility through an itemized line on the bill showing the credit, and automatically processes compensation without delay. Most customers will find bill credits convenient and appropriate.

76. Prepaid services require different handling since future bills do not exist. For these customers, account credit should be applied that extends the service period or increases the account balance depending on service structure. For example, a prepaid mobile customer on a 30-day plan receiving 3 days compensation should have their service extended by 3 days, while a prepaid customer with pay-as-you-go service should receive equivalent dollar value added to their account balance. The key principle is that prepaid customers receive equivalent value to postpaid customers despite different billing structures.

77. Final bill situations occur when customers cancel service or move immediately following an outage. In these cases, bill credits provide no value since no future charges exist to offset. TSPs must provide refunds by cheque or electronic transfer within 30 days of the outage. This requirement ensures that customers are not denied compensation simply because they changed providers following unsatisfactory service.

78. No cash-out restrictions should apply when customers request service cancellation. Some providers may prefer to offer credits toward future service as a customer retention tool, but consumers entitled to refunds should be able to receive compensation as payments if ending the service relationship. Restrictions that trap compensation value in accounts customers no longer wish to use undermine the compensatory purpose of refunds.

79. TSPs must develop systems to automatically calculate and apply refunds without customer intervention. An implementation timeline of 6-12 months is reasonable for system development, integration with billing platforms, testing, and rollout. Most major TSPs already possess the customer database, service tracking, and billing systems necessary for automation— the requirement is to integrate outage detection with compensation calculation and bill credit application.

80. Small provider considerations recognize differential capabilities while maintaining consumer protection principles. Small providers defined as having fewer than 500,000 subscribers may receive extended implementation timelines of an additional 6 months beyond major providers, simplified calculation options using flat daily rates rather than hourly pro-rating, and manual processing allowances for providers under 5,000 subscribers during the transition period. However, core refund obligations must apply equally to ensure consumer protection and fair competition. A customer served by a small provider should not receive inferior protection simply due to provider size—the implementation approach may be scaled, but the substantive consumer rights must be equivalent.

81. Detection feasibility varies by technology platform, with TSP responses to Appendix 1 demonstrating that most providers can detect outages— though capabilities vary. Modern network management systems provide extensive telemetry and customer connection monitoring. The Commission should require TSPs to develop necessary detection capabilities within the implementation timeline rather than accepting claims that detection is infeasible. For providers with genuine technical limitations, interim approaches such as geographic area-based detection can provide approximations until customer-specific systems are operational.

PART IV – CUSTOMER COMMUNICATION REQUIREMENTS

A. Proactive Notification Obligations

Mandatory Proactive Communication (A2-Q18, A2-Q5(b), A2-Q16(a))

82. TSPs must proactively notify customers of service outages without requiring customer inquiry. Passive approaches that wait for customers to discover outages and seek information are fundamentally inadequate for consumer protection.

83. Notification obligations should include several components that work together to keep consumers informed throughout the outage lifecycle. Initial notification should occur within 1-2 hours of outage detection, providing consumers rapid awareness that the provider is aware of the problem and working on restoration. This initial contact serves critical safety and planning functions even if detailed information is not yet available.

84. Regular updates should be provided every 4-6 hours during the first 24 hours, then every 2-4 hours as outages extend beyond one day. These recurring updates serve multiple purposes: they demonstrate ongoing provider attention to the problem, provide revised restoration estimates as work proceeds, communicate unexpected complications or delays, and maintain consumer confidence that restoration efforts continue. The increased frequency after 24 hours recognizes that extended outages create escalating consumer anxiety and need for information.

85. Restoration notice should be sent within 1 hour of service restoration, confirming to consumers that service has returned to normal operation. Customers may not immediately realize service has been restored, particularly if they are not actively attempting to use the service at the moment restoration occurs. Proactive restoration confirmation allows consumers to resume normal activities with confidence.

86. Compensation notice should provide information about automatic refunds to be applied, including the calculation basis, amount, and timing of credit application. This transparency ensures consumers can verify proper compensation and builds trust in the automatic refund system.

87. These proactive communication requirements are essential for consumer safety, planning, and informed decision-making. Consumers need outage awareness to arrange alternative connectivity for critical needs, adjust work and personal schedules, understand when service will return, and make informed decisions about provider quality.

88. Scope requirements balance administrative burden against consumer protection needs. Requirements should apply to outages affecting 50+ customers or exceeding 2-4 hours duration, capturing incidents large enough or long enough to justify notification obligations while avoiding obligations for extremely brief or

isolated issues. For critical services including 9-1-1 and accessibility services, immediate notice with hourly updates for the first 6 hours should be required. The heightened criticality of these services for consumer safety justifies enhanced communication even for shorter outages.

B. Information Content and Timing

Required Information (A2-Q19, A2-Q16(b), A2-Q16(d))

89. Customer notifications must include specific information that addresses consumer needs during outages, with content requirements varying based on outage stage and duration.

90. Essential information required in all notifications should include confirmation that the TSP is aware of the outage, eliminating consumer uncertainty about whether the problem has been detected. Affected services and geographic areas should be specified so consumers understand the scope and can assess whether their location is impacted. Estimated restoration time should be provided if available, even if preliminary or approximate, as consumers need planning information. Critically, instructions on how to access emergency services during telecommunications outages must be included, addressing the most severe safety implications. Available alternatives or workarounds should be communicated, such as using wifi calling, accessing public wifi locations, or other temporary solutions that may help consumers maintain limited connectivity.

91. Additional information for extended outages beyond 12-24 hours should include expanded detail matching the escalating consumer need for information as disruption persists. The cause of outage in general terms helps consumers understand whether the problem stems from equipment failure, external damage, cyber incident, or other factors. Detailed steps being taken to restore service demonstrates provider commitment and helps consumers assess restoration timeline realism. Comprehensive compensation information should be provided at this stage, explaining the automatic refund calculation and timing. Updated contact information for status updates gives consumers a path to seek additional information if needed.

92. Information should be clear, accurate, and presented in accessible formats that serve diverse consumer needs. Technical jargon should be avoided or explained in plain language. Information should be factual rather than speculative, with uncertain elements clearly identified as estimates. Accuracy is essential to maintain consumer trust—providers should acknowledge uncertainty rather than provide inaccurate information that later proves wrong.

Communication Channels (A2-Q20, A2-Q16(e))

93. TSPs must use multiple channels to ensure message delivery, recognizing that outages may disable some communication methods while others remain available.

94. Primary channels suitable for most outages include SMS or text messaging where customers have mobile service, particularly effective for reaching customers quickly on devices they typically have nearby. Email notifications serve customers with alternative internet access through mobile data, secondary providers, or public wifi. Website banners and status pages provide centralized information for customers who navigate to the provider's web presence seeking outage information. Mobile app notifications reach customers who have installed provider applications and have data connectivity.

95. Secondary channels become critical for major outages affecting primary communication systems. Social media updates through platforms such as Twitter and Facebook reach consumers where they may be checking for news and information. Traditional media notices using radio and television are particularly important for widespread outages affecting internet and mobile service, as these broadcast media may be the only information sources available. Community notification systems including partnerships with municipalities, emergency management, and community organizations become vital in disaster scenarios or extremely widespread outages.

96. Channel selection should explicitly consider that primary communication methods may be affected by the outage itself. An internet outage disables email for customers lacking alternative connectivity. A mobile network outage prevents SMS delivery. TSPs must think beyond their own infrastructure to reach affected customers through whatever channels remain functional.

C. Accessibility Requirements

Web Content Accessibility Guidelines (WCAG) Compliance and Multiple Formats (A2-Q21, A2-Q16(f))

97. All customer communications must meet accessibility standards to ensure persons with disabilities receive equal access to critical outage information.

98. WCAG 2.1 Level AA compliance should be mandatory for all digital communications including websites, mobile applications, and digital notification systems. This internationally recognized standard ensures compatibility with screen readers and other assistive technologies, provides adequate color contrast for low vision users, enables keyboard navigation for persons unable to use pointing devices, and includes text alternatives for images and visual content.

99. Plain language requirements serve both general readability and accessibility for persons with cognitive disabilities or limited English proficiency. Communications should avoid technical jargon or define essential technical terms in everyday language. Sentences should be short and direct. Information should be organized logically with clear headings.

100. Multiple format requirements ensure information is available in ways different users can access. For deaf and hard of hearing users, outage notifications should be provided in ASL and LSQ video formats—the Accessible Canada Act recognizes American Sign Language, Quebec Sign Language, and Indigenous sign languages as "primary languages for communication by deaf persons in Canada." Sign languages are distinct visual languages with their own grammar and syntax, not word-for-word translations of English or French, making video format essential rather than text alone. Audio formats including phone line recordings and audio file downloads serve blind and low vision users who may not access text effectively. Visual formats such as maps showing affected areas and infographics summarizing key information serve users who process visual information more effectively than text.

101. Translation services must be available for official languages as required by law, and for Indigenous languages where applicable in areas with significant Indigenous populations. Accessibility includes language accessibility—information provided only in English effectively excludes French-speaking Canadians and Indigenous language speakers from critical safety information.

102. Compatibility with assistive technologies and accessibility devices requires technical implementation that works with screen reading software, screen magnification tools, alternative input devices, and specialized accessibility equipment. TSPs must test communications delivery through these assistive technologies rather than assuming compatibility.

103. Enhanced communication requirements apply for customers registered as having accessibility needs. These customers should receive priority notification, confirmation of message receipt where technically possible, multiple simultaneous channels to ensure delivery through at least one accessible method, and specialized formats based on registered needs such as large print, audio-only, or relay service delivery.

104. Communications should be sent to both account holders and account users to ensure anyone using the service is kept informed. Modern telecommunications accounts often have a primary billing contact but multiple users—family members, employees, household members. Outage information needs to reach all users, not just the person who pays the bill.

PART V – ENHANCED PROTECTIONS FOR VULNERABLE POPULATIONS

A. Persons with Disabilities

Disproportionate Impacts (A2-Q17, A2-Q23)

105. Persons with disabilities who depend on accessibility services such as message relay service (MRS) and video relay service (VRS) face complete communication

loss when these services fail. Three deaf organizations provided detailed evidence in TNC 2023-39 documenting unique vulnerabilities.

106. Canada Deaf Grassroots Movement (CDGM) testified that while outages "can be disconcerting for hearing people," hearing Canadians can "gather information through unfettered verbal interactions from various sources including the radio"—options unavailable to those with hearing loss, who therefore "experience more distress than normal during an outage."[22] CDGM emphasized that "Deaf, Hard of Hearing, and DeafBlind are most vulnerable when they are unable to communicate with anyone," a situation "compounded by a state of emergency where life is at risk."[23]

107. The DHH Coalition (representing DAANS, NLAD, and OAD) documented that "The Canadian Administrator of VRS (CAV) is the only entity providing VRS in Canada" and similarly single providers operate TTY relay and IP relay, such that any outage means "no DHH consumer may use [that service] to make or receive phone calls with a hearing person" including 9-1-1 or 988 emergency services.[24] The Coalition recommended a 15-minute outage threshold for relay services "without any regard to the number of subscribers affected" and noted that the CRTC has designated VRS as a "basic telecommunications service."[25]

108. Deaf Wireless Canada Consultative Committee (DWCC) emphasized that "Deaf, Deaf-Blind and Hard of Hearing Canadians…are often delayed in receiving information from society as a whole because they do not receive incidental information the same as their fellow hearing neighbours."[26] DWCC endorsed the 15-minute threshold and specified that backup systems "must have a strong and direct connection with the 9-1-1 network."[27]

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[22] Canada Deaf Grassroots Movement (Kimberly Wood), Intervention, TNC 2023-39, 24 March 2023, at para. 19.

[23] Canada Deaf Grassroots Movement, Reply, TNC 2023-39, 11 April 2023, at para. 3.

[24] DHH Coalition (DAANS, NLAD, and OAD), Intervention, TNC 2023-39, 24 March 2023, at paras. 13, 16-17.

[25] DHH Coalition, Intervention, TNC 2023-39, 24 March 2023, at paras. 11, 23 (citing CRTC TRP 2014-187).

[26] Deaf Wireless Canada Consultative Committee (Jeffrey Beatty), Reply, TNC 2023-39, 8 December 2023.

[27] Deaf Wireless Canada Consultative Committee, Intervention, TNC 2023-39, 24 March 2023, Response to Q1.ii.a and Opening Remarks.

109. Unlike hearing users who can use alternative methods such as in-person communication, written notes, or gesture during telecommunications outages, deaf and hard of hearing users who depend on relay services have no functional alternatives when the relay infrastructure fails. The service is not merely convenient—it is absolutely essential for all communication including emergencies. This structural vulnerability—where relay service users face total isolation when their single service option fails—justifies classification as mission-critical infrastructure requiring lower outage thresholds (15 minutes for relay-specific outages), priority restoration protocols, and specialized notification requirements.

110. The 2023 Policy Direction specifically mandates the Commission to "proactively identify, remove, and prevent barriers relating to telecommunications services, in particular for persons with disabilities." CAMP strongly supports enhanced protections for persons with disabilities that address this disproportionate vulnerability. Priority restoration protocols should ensure that accessibility services including MRS and VRS are restored first when outages affect multiple service categories. Technical staff should be specifically directed to prioritize accessibility service restoration even if this means accepting slightly longer restoration times for other services. The profound isolation experienced by persons with disabilities during communication loss justifies this prioritization.

111. Alternative access provisions must be provided during extended accessibility service outages beyond 4-6 hours. TSPs should maintain emergency protocols that provide temporary communication access through methods such as dispatching staff members who can facilitate communication in person, providing temporary access to alternative relay services, or deploying portable equipment that can restore access even if permanent infrastructure remains offline. These alternatives ensure that persons with disabilities are not left completely isolated during extended outages.

112. Enhanced compensation through lower duration thresholds of 2-4 hours rather than standard 4-6 hours recognizes that communication loss for persons with disabilities creates immediate and severe impacts. Higher refund multipliers at 1.5x the standard rates acknowledge the disproportionate harm. While all consumers suffer from outages, the complete loss of all communication capability justifies enhanced compensation for persons with disabilities.

113. Specialized communication through proactive outreach using accessible channels and formats ensures that persons with disabilities receive outage notifications through means they can actually access. Email and text-based notifications serve deaf and hard of hearing users. Audio notifications serve blind and low vision users. Notifications must be provided in multiple formats to reach users with diverse disability types.

114. Service continuity planning should include mandatory redundancy for critical accessibility services. MRS and VRS infrastructure should have backup systems, redundant network paths, geographically diverse facilities, and disaster recovery capabilities that exceed standard service requirements. The complete dependence of users on these services justifies heightened reliability standards.

115. These enhanced protections recognize that service outages can completely isolate persons with disabilities who depend on accessibility services for all communication. The differential treatment is not preferential—it is necessary to achieve equal effective access to telecommunications during outages.

116. Implementation should rely on voluntary registries allowing customers to self-identify for enhanced protections. Self-declaration should be sufficient without proof requirements, avoiding the indignity and administrative burden of requiring medical documentation. Privacy protection must ensure registry information is used solely for service management and never for marketing or other secondary purposes. Annual confirmation requests can maintain registry accuracy without imposing excessive burden.

B. Rural and Remote Customers

Longer Restoration Times and Fewer Alternatives (A2-Q18, A2-Q24)

117. Rural and remote customers require special consideration based on evidence from multiple proceedings documenting systematic disadvantages. The Commission has recognized that rural residents experience outages that "impact their personal, social and economic well-being" and "limit their living standards" compared to southern/urban counterparts, with some residents feeling they have "no choice but to leave their communities" due to unreliable service.[28]

118. These harms stem from structural barriers documented by competitive carriers and small rural providers.

119. **Infrastructure monopolization.** The Competitive Network Operators of Canada (CNOC) testified that "there exists a widespread lack of competitive transport options throughout Canada" with "extensive evidence of transport related barriers" in rural areas.[29] Network outages affecting these limited facilities "lead to significant collateral harm" with "particularly acute" competitive implications.[30] The impossibility of network duplication—competitors cannot reproduce facilities spanning "thousands of kilometres of rough northern terrain" given "remote nature,

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[28] CNOC, Intervention, TNC 2022-147, 6 October 2022, at paras. 89-90 (citing Commission findings at TNC 2022-147 paras. 68-71).

[29] CNOC, Intervention, TNC 2023-39, 24 March 2023, at para. 22.

[30] CNOC, Intervention, TNC 2023-39, 24 March 2023, at para. 23.

short construction season, and low population density"—means rural areas lack redundant infrastructure.[31]

120. **Provider resource constraints.** Small rural providers represented by the Independent Telecommunications Providers Association (ITPA) testified that outages trigger "all hands on deck" responses consuming "scarce human resources" across the entire company.[32] Administrative staff needed for coordination are "not available outside of normal business hours,"[33] creating additional restoration delays.

121. **Single-provider dependency.** Many rural communities have only one telecommunications provider,[34] eliminating consumer ability to switch during outages and creating complete service loss when that provider's infrastructure fails.

122. Enhanced protections for rural customers should include lower compensation thresholds (2-4 hours vs 4-6 hours standard), priority restoration commitments, and obligations on wholesale facility owners to maintain redundancy in single-provider areas. Restoration targets should recognize geographic realities while preventing acceptance of systematic delays. Rural customers should not experience both more frequent and longer outages—if restoration times must be longer due to unavoidable geographic factors, frequency should be minimized through superior reliability engineering.

123. Alternative access provisions become critical for rural outages exceeding 24-48 hours. Temporary solutions including mobile cells on wheels (COW), portable satellite internet equipment, temporary satellite phones, or subsidized access to alternative providers should be deployed. In urban areas, consumers facing extended outages may be able to work from cafes, libraries, or friends' homes. Rural customers often have no such alternatives, making provider-supplied temporary access essential.

124. Enhanced communication recognizes that rural customers have fewer alternatives and greater need for accurate information. Rural customers cannot easily switch to a competitor during an outage—many rural areas have a single provider.

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[31] Competitive Network Operators of Canada (CNOC), Intervention, TNC 2022-147, 6 October 2022, at paras. 76-77.

[32] Independent Telecommunications Providers Association (ITPA), Intervention, TNC 2023-39, 24 March 2023, at para. 9.

[33] ITPA, Intervention, TNC 2023-39, 24 March 2023, at para. 15.

[34] CNOC, Intervention, TNC 2022-147, 6 October 2022, at para. 71 (citing TNC 2022-147 at para. 25).

Restoration timeline information is critical for decision-making about whether to remain in place or temporarily relocate, whether to cancel time-sensitive appointments, and how to arrange work coverage.

125. Higher compensation multipliers at 1.25-1.5x standard rates should apply for extended rural outages exceeding urban restoration times by 24+ hours. When infrastructure challenges result in rural customers experiencing 48-hour outages for incidents that would be resolved in 12 hours in urban areas, the additional 36 hours of rural disadvantage justifies enhanced compensation. This approach maintains base-level incentives for rapid restoration while acknowledging legitimate geographic challenges.

126. Infrastructure requirements should be incorporated into network design standards for rural areas. Backup power systems to prevent outages during power grid failures common in rural areas, redundant network paths where geographically feasible, and prepositioning of spare equipment in rural locations should be standard practice. These infrastructure investments reduce outage frequency and duration, ultimately reducing both consumer harm and provider compensation obligations.

127. Geographic identification through service addresses enables automatic application of enhanced rural protections without requiring customer registration. Unlike disability-based enhanced protections requiring voluntary self-identification, rural location is objectively verifiable through existing address records. Automated application eliminates administrative burden and ensures universal coverage.

C. Other Vulnerable Populations

Additional Populations Requiring Enhanced Protections (A2-Q19, A2-Q25)

128. Additional populations require enhanced protections tailored to their specific vulnerabilities and the particular ways telecommunications outages create disproportionate harm.

129. Low-income consumers face economic constraints that prevent purchasing the backup services available to more affluent Canadians. While higher-income consumers can maintain secondary internet connections, mobile hotspots, or temporary relocation to spaces with connectivity, low-income Canadians must simply endure the full impact. Enhanced protections should include automatic refund application without any request requirement to ensure consumers unfamiliar with complaint processes receive compensation, payment flexibility during outages such as suspension of payment deadlines or late fees for bills due during service failure, and subsidized alternative access options when outages extend beyond 48 hours.

130. Seniors represent a population with heightened vulnerability due to health needs, social isolation risks, and reduced ability to arrange alternatives. Enhanced protections should include simplified communication in large print formats

readable by older adults experiencing vision changes, audio formats for those who prefer spoken information, priority restoration for customers over 65 living alone who may have no alternative means of summoning help in emergencies, and wellness check protocols for extended outages to ensure isolated seniors are safe.

131. Indigenous communities experience telecommunications outages within a context of limited infrastructure, geographic isolation, and ongoing telecommunications service gaps. Enhanced protections should include culturally appropriate communication developed in consultation with Indigenous leadership, recognition of extremely limited infrastructure alternatives in many Indigenous communities with single-provider service, and community-level notification protocols that work through Band offices, Indigenous organizations, and community institutions.

132. Customers with medical needs require reliable connectivity for health monitoring devices transmitting data to care providers, telehealth appointments that cannot occur during outages, medication management systems providing reminders and dosing instructions, and emergency communication with care providers. Enhanced protections should include voluntary registries for priority restoration similar to disability registries, alternative access provisions ensuring ability to reach healthcare providers during extended outages, and coordination with health authorities to ensure medical professionals are aware when patients lose monitoring connectivity.

133. TSPs should maintain voluntary registries for vulnerable populations requiring self-identification. Registry systems should include annual confirmation requests to maintain accuracy as customer circumstances change, self-declaration as sufficient for most categories without requiring documentation, privacy protection ensuring registry information is never used for marketing or shared with third parties, and simple enrollment processes accessible through phone, website, and in-person channels.

134. The Commission should monitor effectiveness through disaggregated reporting on vulnerable population service metrics. TSP quarterly reports should break down outage impacts, restoration times, and compensation by customer category. This data will enable the Commission to assess whether enhanced protections are functioning as intended and whether specific vulnerable populations continue to experience disproportionate harm requiring further intervention.

PART VI – WHOLESALE COMPETITOR CONSIDERATIONS

A. Fair Competition Principles

Same Retail Protections Regardless of Provider Type (A2-Q20, A2-Q26)

135. CAMP submits that wholesale competitor arrangements require special consideration to ensure fair competition in telecommunications markets. The fundamental principle is that end customers should receive identical protections

regardless of whether their provider is facilities-based or operates through wholesale arrangements. A customer purchasing internet service from a wholesale competitor should receive the same outage notifications, refunds, and enhanced protections as a customer purchasing directly from the facility owner. Any framework that provides inferior protection to wholesale-based provider customers would create competitive disadvantage unrelated to service quality or operational efficiency.

136. Information symmetry between facility owners and wholesale competitors is essential for fair competition. Wholesale competitors cannot meet customer protection obligations if they lack information about outages affecting their customers. Current wholesale practices create systematic information gaps that prevent wholesale competitors from providing service equivalent to facilities-based carriers. Mandatory information sharing requirements are essential to eliminate this structural disadvantage.

137. Liability alignment requires a clear framework for how obligations and compensation flow through wholesale relationships. The facility owner whose infrastructure has failed should ultimately bear the compensation cost while the wholesale competitor maintains direct responsibility to retail customers. This flow-through approach ensures that retail customers receive immediate attention from their chosen provider while costs fall appropriately on the party whose infrastructure caused the service failure.

138. The framework must avoid creating competitive disadvantage that discourages wholesale market participation. If wholesale-based competition faces systematic obstacles in meeting consumer protection obligations, facilities-based carriers gain an artificial advantage that undermines the competitive benefits of wholesale access policies. The Commission should design obligations recognizing that healthy wholesale markets serve Policy Direction objectives by enabling facilities-based competition from providers who could not economically construct nationwide infrastructure.

139. Current practices create significant competitive disadvantages for wholesale competitors, as evidenced by extensive submissions in prior proceedings now incorporated into this record. The wholesale information gaps documented in TNC 2022-147 and TNC 2023-39 demonstrate that without regulatory intervention, facilities-based carriers provide inadequate information to wholesale customers. Voluntary market forces have not corrected these information asymmetries despite their material impact on competition.

140. A clear liability framework should allocate responsibilities as follows: facility owner outages trigger wholesale compensation obligations that flow from the facility owner to the wholesale competitor; facility owners compensate wholesale competitors for the full amount of retail customer refunds the wholesale competitor

must provide; wholesale competitors remain responsible to retail customers for all consumer protections including communication, refunds, and enhanced protections. This structure ensures retail customers have a single responsible provider (their chosen wholesale competitor) while costs ultimately fall on the party whose infrastructure failed (the facility owner).

B. Current Information Gaps

Evidence of Wholesale Notification Failures (A2-Q21, A2-Q27)

141. Evidence from prior proceedings documents systematic wholesale notification failures. TekSavvy testified in TNC 2017-49 that for "wholesale network access no such thing exists" regarding service level agreements with incumbent carriers,[35] meaning:

- No contractual notification obligations when upstream networks fail
- No guaranteed response times for outage information
- No standardized communication protocols
- Complete absence of systematic notification framework

This testimony from a major wholesale competitor demonstrates wholesale notification failures are structural, not occasional oversights.

142. CNOC reported in TNC 2023-39 that wholesale-based providers "will not have any meaningful information to disclose" about upstream network outages.[36] Specific gaps include:

- No real-time diagnostic tools or monitoring capabilities
- Delayed or absent notifications of unplanned outages
- Limited access to restoration estimates or status updates
- Complete dependence on facility owners for customer communication

While facilities-based carriers have extensive network monitoring systems, wholesale competitors learn about outages from customer complaints rather than proactive facility owner notification.

143. Small independent providers represented by ITPA which leverage the wholesale regime face identical information gaps. The problem spans the entire wholesale

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[35] TekSavvy, Intervention, TNC 2017-49, 13 September 2017, at para. 16. See also CNOC, Intervention, TNC 2023-39, at para. 11.

[36] Telecom Regulatory Policy CRTC 2018-123, 18 April 2018, at para. 65; CNOC, Intervention, TNC 2023-39, at para. 11.

market, affecting both large wholesale competitors and small CLECs/ILECs purchasing wholesale services.

144. These gaps prevent wholesale competitors from competing effectively or serving their customers appropriately during service outages. When a wholesale competitor's customers experience service loss due to facility owner infrastructure problems, the wholesale competitor faces immediate customer complaints and inquiries but has no information to provide. The wholesale competitor cannot send proactive notifications because they have not been notified. The wholesale competitor cannot provide restoration estimates because the facility owner has not shared status. The wholesale competitor cannot explain the cause or scope because this information has not been provided. The result is that wholesale-based providers appear unresponsive and uninformed to their customers even though the information gap stems entirely from facility owner practices.

145. CAMP submits that current wholesale notification practices fail to provide wholesale competitors with information necessary to meet retail customer protection obligations. As the Commission implements new customer notification and communication requirements through this proceeding, parallel wholesale notification requirements are essential to ensure wholesale competitors can comply. Without mandatory wholesale information sharing, the new consumer protections will effectively be available only to customers of facilities-based carriers, creating a significant competitive disadvantage for wholesale-based providers.

146. Even when outage cause originates in the wholesale competitor's own systems rather than wholesale provider infrastructure, facility owners should notify wholesale competitors of any facility-level issues detected. However, wholesale competitors bear full responsibility for their own system outages affecting their customers. The wholesale notification requirements address situations where facility owner infrastructure failures affect wholesale competitor customers—a scenario where the facility owner possesses information the wholesale competitor needs but currently does not share.

C. Mandatory Wholesale Notification Framework

Specific Requirements (A2-Q22, A2-Q27)

147. The Commission should mandate that facilities-based carriers provide wholesale competitors with comprehensive outage information that enables compliance with retail customer obligations.

148. **Immediate notification within 30-60 minutes of outage detection:**

- Provides facility owners time to confirm outage and assess scope
- Enables wholesale competitors to meet 1-2 hour retail customer notification requirement

- Allows wholesale competitors window to receive notice and inform their customers

149. **Required information content:**

- Affected services and geographic areas
- Number of affected wholesale circuits/customers/endpoints
- Estimated restoration time (even if preliminary)
- Regular status updates (minimum every 2 hours)

This enables wholesale competitors to determine customer impacts, assess scale, and provide meaningful customer communication.

150. **Technical integration requirements:**

- APIs or automated notification systems for real-time information flow
- Real-time status dashboards for ongoing network visibility
- Diagnostic tool access for independent verification and troubleshooting

These systems eliminate reliance on phone calls, emails, or learning about outages through customer complaints.

151. Compensation pass-through requires a clear framework ensuring wholesale compensation that wholesale competitors can flow to retail customers. When facility owner infrastructure failures trigger retail customer refund obligations, the facility owner should compensate the wholesale competitor for the full amount of those retail refunds. This ensures that wholesale competitors are not financially penalized for infrastructure failures beyond their control while maintaining their obligation to promptly compensate retail customers.

152. These requirements should be incorporated into wholesale tariffs and service agreements through explicit conditions of service for facilities-based carriers. The Commission should use its tariff authority to ensure wholesale notification requirements have binding force rather than relying on voluntary commitments. Service level agreement templates should be modified to include notification obligations as standard terms.

153. Wholesale notification requirements should be imposed through conditions of service for facilities-based carriers under section 24 of the Telecommunications Act. These requirements should be reflected in wholesale tariffs with standardized notification obligations that apply uniformly rather than being subject to negotiation. Incorporation into wholesale service agreements makes the obligations contractually enforceable by wholesale customers. Industry working

groups can develop technical specifications for implementation including API standards, data formats, and dashboard interfaces, but minimum notification requirements should be mandatory rather than voluntary.

154. Small facilities-based providers may receive modified obligations recognizing technical limitations and smaller scale. Providers with limited technical sophistication may not be able to implement sophisticated API systems immediately. However, these providers must still provide timely notification through available means such as phone calls, email, or text messages pending development of automated systems. The core obligation to notify remains universal even if implementation methods vary based on provider capability.

155. Cost recovery should occur through general wholesale rates rather than specific notification charges. Development costs for notification systems should be amortized across the wholesale rate base as infrastructure investment. Ongoing operational costs are minimal once systems are established—automated notifications cost virtually nothing to send. No double recovery should be allowed—facilities-based carriers cannot charge separately for notifications required under consumer protection rules. Treating notification charges as a new line item would effectively impose a penalty on wholesale customers for facility owner regulatory compliance obligations. Costs should be allocated proportionally based on wholesale customer base size, ensuring larger wholesale competitors with more customers at risk pay proportionate shares while small wholesale competitors are not overburdened.

PART VII – ADMINISTRATION AND ENFORCEMENT

A. Implementation Framework

Consumer Protection Code Amendments (A2-Q27, A2-Q28)

156. CAMP recommends implementing consumer protections through a comprehensive framework that leverages existing regulatory instruments while ensuring complete coverage.

157. Amendments to existing Consumer Protection Codes provide the natural vehicle for implementation. The Internet Code should be amended to include all internet service protections including refund calculations, notification requirements, and enhanced protections for vulnerable populations. The Wireless Code should be similarly amended for mobile service protections, incorporating the framework elements adapted to wireless-specific considerations. The Television Service Provider Code should receive amendments adding TV service protections, potentially with modified refund multipliers reflecting reduced criticality. New provisions for wireline voice services should be developed given that voice service is not currently covered by a comprehensive consumer protection code despite remaining critical for specific populations.

158. Wholesale requirements should be implemented through tariff amendments for wholesale notification obligations, ensuring the requirements have binding force on facilities-based carriers. Conditions of service for facilities-based carriers under section 24 of the Telecommunications Act provide additional authority to mandate wholesale information sharing. These parallel implementation mechanisms ensure wholesale obligations receive the same regulatory weight as retail customer protections.

159. Technical standards development through an industry working group can address implementation details while the Commission establishes mandatory minimum requirements. A working group including representatives from facilities-based carriers, wholesale competitors, consumer organizations, and accessibility advocates can develop technical specifications for notification systems, API standards for wholesale information sharing, data formats for standardized outage reporting, and dashboard interfaces for wholesale competitor network monitoring. The Commission should approve these technical standards within 6 months of establishing the working group to maintain implementation momentum.

160. This approach leverages existing frameworks rather than creating entirely new regulatory instruments, minimizing administrative burden while ensuring comprehensive coverage. Consumers and providers are already familiar with the Consumer Protection Codes, making amendments a natural extension of established requirements.

161. The Commission should impose protections as conditions of service under sections 24 and 24.1 of the Telecommunications Act for TSPs. Section 24 authorizes the Commission to impose conditions on telecommunications carriers, while section 24.1 extends similar authority to wholesale competitors and other service providers. For broadcasting distribution undertakings (BDUs), authority derives from paragraph 9.1(1)(j) of the Broadcasting Act, which permits the Commission to regulate BDU terms of service. This multi-statute approach ensures legal authority exists for comprehensive implementation across all service types and provider categories.

B. Compliance Monitoring

Reporting and Oversight (A2-Q23-Q26)

162. Effective monitoring requires robust data collection, independent complaint handling, and public transparency that creates accountability through both regulatory oversight and market discipline.

163. Quarterly reporting by TSPs should be mandatory and comprehensive. Reports should include the number and duration of outages by service type, breaking down internet, wireless, wireline voice, and television outages separately. Customers affected by geography and service category should be reported to enable analysis of whether certain regions or service types experience disproportionate impacts.

Notification timing and channels used should be documented to verify compliance with communication requirements. Refunds calculated and applied should be reported in aggregate and by category to ensure automatic refund systems are functioning properly. Vulnerable population metrics should be disaggregated to assess whether enhanced protections are reaching intended beneficiaries.

164. CCTS integration represents a critical monitoring component. The Commissioner for Complaints for Telecommunications Services already administers Consumer Protection Code complaints and possesses established processes for consumer dispute resolution. Expanded mandate should include handling outage-related complaints about failure to provide required notifications, inadequate or inaccurate information during outages, failure to apply automatic refunds, and disputes over refund calculations.

165. Quarterly reporting by CCTS on complaint trends, including volumes by TSP and issue type, compliance patterns identified through complaint handling, and resolution outcomes, would provide the Commission with frontline intelligence about implementation effectiveness. Public reporting of TSP compliance performance would create reputational incentives for voluntary compliance. Authority to order immediate refunds in individual cases would ensure consumers receive remedies without waiting for lengthy Commission proceedings.

166. Commission audits should supplement reporting and complaint data with proactive compliance verification. Annual compliance audits of major TSPs would verify that outage detection systems function properly, refund calculations follow required methodologies, notification systems reach affected customers, and vulnerable population registries receive appropriate treatment. Targeted audits based on complaints or concerning report data would enable rapid investigation of potential systematic non-compliance. Mystery shopping for communication requirements, where Commission staff or contractors pose as customers during outages to test whether notifications are received and information is accurate, would provide real-world verification of compliance.

167. Public transparency through online dashboards showing TSP outage and compliance metrics will enhance accountability and enable consumer comparison. Dashboard content should include provider-level outage frequency and duration statistics, customer impact metrics, compliance scores based on notification timing and refund accuracy, and historical trends. This public information enables consumers to compare provider reliability when making purchasing decisions, strengthening market discipline beyond regulatory enforcement. Providers with superior reliability would gain competitive advantage, creating market incentives for operational excellence.

168. The CCTS should serve as the primary administrator of outage protections. As the independent organization that handles telecommunications complaints and

already administers Consumer Protection Codes, CCTS possesses the institutional expertise, stakeholder relationships, and administrative infrastructure for this expanded role. The alternative of creating new complaint handling mechanisms would duplicate existing capability and confuse consumers about where to direct concerns.

169. CCTS should be required to report specific information beyond general complaint statistics. Report content should include complaint volumes by TSP and service type to identify providers or services with unusual complaint levels, refund disputes and resolutions to track whether automatic refund systems are functioning or generating disputes, compliance issues identified through individual case handling that may indicate systematic problems, and vulnerable population impacts to assess whether enhanced protections effectively reach intended beneficiaries. These detailed reports enable the Commission to identify problems early and intervene before consumers suffer widespread harm.

170. The Commission should provide CCTS with necessary resources to fulfill this expanded mandate. Additional staff may be required to handle increased complaint volumes related to outage protections. Technical expertise in outage verification and refund calculation methodology should be developed. Public reporting systems and dashboards require investment in information technology. The Commission should work with CCTS to assess resource needs and ensure adequate funding through levy adjustments or other mechanisms.

C. Enforcement Mechanisms

Administrative Monetary Penalties (A2-Q25)

171. The Commission should establish clear enforcement mechanisms that create meaningful incentives for compliance while providing graduated responses matching violation severity.

172. Administrative Monetary Penalties (AMPs) should be calibrated to exceed the cost of compliance, ensuring that non-compliance is always economically disadvantageous. For failure to provide required notifications, penalties of $1,000-$10,000 per incident reflect the serious safety implications of leaving customers unaware of outages. These amounts should be scaled based on the number of affected customers and duration of notification failure. For failure to apply automatic refunds, penalties of $100 per affected customer create direct financial consequences roughly equivalent to the refund obligation itself, ensuring that attempting to avoid refund payments provides no economic benefit. For systemic non-compliance involving repeated violations or systematic failures affecting thousands of customers, penalties up to $250,000 for first violations and $500,000 for subsequent violations acknowledge the severity of widespread consumer harm.

173. Escalating enforcement provides graduated responses that reserve the most severe consequences for persistent non-compliance while giving providers opportunity to

correct inadvertent violations. First violations should trigger warning letters and compliance plans requiring the provider to identify the cause of non-compliance and implement corrective measures. This approach acknowledges that initial implementation may involve technical issues or misunderstandings that do not warrant immediate penalties. Second violations should result in AMPs and public disclosure, creating both financial and reputational consequences. At this stage, the violation represents failure to correct known issues despite previous warning. Systematic violations involving repeated failures across multiple outages or affecting multiple consumer protection requirements should trigger license conditions or further proceedings that may result in more comprehensive regulatory intervention.

174. Expedited complaint resolution ensures consumers receive timely remedies rather than waiting months or years for enforcement proceedings. CCTS should have authority to order immediate refunds in individual cases where the facts are clear and the refund calculation is straightforward. A 30-day resolution timeline for outage complaints would provide consumers rapid recourse while giving providers reasonable opportunity to investigate and respond.

175. Clear enforcement creates meaningful incentives for compliance by eliminating ambiguity about consequences and ensuring that compliance is economically rational. Providers facing unclear or unenforced requirements may calculate that non-compliance risks are acceptable. Explicit penalty amounts and enforcement procedures remove this calculus by making compliance consequences predictable and certain.

176. Public disclosure of violations and AMPs imposed will create reputational incentives for compliance beyond the direct financial impact of penalties. Telecommunications providers value their brand reputation, and public disclosure of consumer protection failures creates market consequences. Published enforcement data will also inform consumer choice, enabling customers to consider provider compliance records when selecting service.

D. Implementation Timeline

Phased Approach (A2-Q28-Q29, A2-Q30)

177. CAMP recommends a phased implementation that balances consumer protection urgency against provider implementation needs, prioritizing protections that can be implemented quickly while allowing additional time for more technically complex requirements.

178. **Phase 1 (months 0-6): Limited technical development**

- Customer communication requirements using existing email, SMS, website systems
- Basic notification obligations (policy and procedure development)

- Vulnerable population registries (add flags to existing customer databases)
- **Outcome:** Immediate consumer protection improvements

179. **Phase 2 (months 6-12): System development**

- Automatic refund systems (integrate outage detection with billing)
- Wholesale notification (APIs, data feeds, dashboards)
- Compliance reporting systems (data collection and aggregation)
- **Outcome:** Core financial protections operational

180. **Phase 3 (months 12-18): Full integration**

- Enhanced protections fully operational (systems, procedures, training)
- Public transparency dashboards live
- Complete CCTS integration for complaint handling and oversight
- **Outcome:** Mature implementation with all components integrated

181. Small providers may receive 3-6 month extensions upon demonstrating need through Part 1 applications. Extension requests should show specific technical or financial barriers that prevent implementation on standard timelines. The Commission should scrutinize these requests carefully to prevent extensions becoming routine rather than exceptional. Approved extensions should include interim measures that provide consumers some protections during the extension period rather than leaving them completely unprotected.

182. Promotion mechanisms should ensure consumers are aware of new protections and understand how to access them. Consumer awareness campaigns by the Commission and CCTS using radio, television, online advertising, and community outreach can reach broad audiences. TSP notifications to customers about new protections through bill inserts, email, and account messages ensure direct communication with service users. Public service announcements in multiple languages and accessible formats reach diverse populations. Incorporation into TSP websites and service agreements makes information available at points of service sale and contract. Media outreach about enhanced consumer rights can generate news coverage that amplifies official promotion efforts.

183. Review processes should enable evidence-based refinement of protections as implementation experience accumulates. The Commission should conduct an 18-month progress review assessing implementation challenges, early compliance results, consumer awareness levels, and technical issues requiring attention. This early review enables course corrections before problems become entrenched.

184. A 3-year comprehensive review should evaluate effectiveness through consumer outcome metrics including whether outage impacts have decreased, whether vulnerable populations receive enhanced protections, and whether consumer awareness has increased. Compliance rates across providers and violation patterns should be analyzed. Competitive impacts including whether wholesale protections enable fair competition and whether small providers face disproportionate burden should be assessed. International comparisons with jurisdictions that implemented similar protections can provide context.

185. Stakeholder feedback from consumer organizations, industry, and other participants provides qualitative assessment. Annual opportunities for minor threshold adjustments based on evidence should be available without full proceedings, enabling responsive refinement of duration thresholds, refund multipliers, or other technical parameters.

CONCLUSION

186. Service outages cause significant consumer harm across economic, safety, social, and accessibility dimensions. Current protections prove inadequate to address these impacts, leaving consumers vulnerable when essential telecommunications services fail. The evidence before the Commission—particularly submissions from prior proceedings incorporated into this record—demonstrates systematic gaps that disadvantage consumers and create competitive inequities.

187. CAMP's recommendations provide a comprehensive framework that protects consumers through automatic refunds, proactive communication, and enhanced protections for vulnerable populations. The framework promotes competition through transparency, reduced information asymmetries, and competitive neutrality in wholesale markets. Implementation feasibility is ensured through phased timelines, scaled obligations, and leveraging existing systems. Accountability is maintained through robust monitoring, enforcement, and regular review.

188. These measures align with the 2023 Policy Direction by advancing consumer interests and competition while relying on market forces where effective. Standardized outage disclosure enables competitive comparison. Automatic refunds create financial incentives for reliability without rate regulation. Wholesale notification requirements eliminate information asymmetries that disadvantage wholesale competitors. The framework achieves consumer protection objectives while strengthening competitive market dynamics.

189. CAMP respectfully requests that the Commission find that current consumer protections during outages are insufficient; adopt mandatory requirements for refunds, communication, and enhanced protections; implement special provisions ensuring fair competition in wholesale markets; establish robust compliance monitoring and enforcement mechanisms; commit to regular review and

adjustment based on evidence; and implement protections through existing Consumer Protection Codes with a phased timeline.

190. These measures will meaningfully protect Canadian consumers during service outages while strengthening competitive outcomes and market accountability. The balance achieved between consumer protection, fair competition, and implementation feasibility demonstrates that effective regulation can advance multiple Policy Direction objectives simultaneously.

191. CAMP appreciates the opportunity to participate in this important proceeding and looks forward to further contributing to the development of effective consumer protections that serve all Canadians.

All of which is respectfully submitted.

Canadian Anti-Monopoly Project (CAMP)

November 13, 2025

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