

July 3, 2020

VIA Intervention Comment Form

Mr. Claude Doucet
Secretary General
Canadian Radio-television and
Telecommunications Commission
Ottawa, Ontario
K1A 0N2

Dear Mr. Doucet,

**Subject: Broadcasting and Telecom Notice of Consultation CRTC 2020-81: Call for
 comments – Provision of paper bills by communications service providers**

1. The Canadian Communication Systems Alliance (“CCSA”) speaks for independent communications distributors – smaller broadcasting distribution companies, telephone companies and ISPs – across Canada. CCSA represents more than 110 companies operating from sea to sea to sea, including across the North.
2. CCSA submits these comments in response to Telecom Notice of Consultation CRTC 2020-81.
3. The smaller operators that CCSA represents depend on their close relationships with their local communities and customers. They have a unique ability to respond to the needs of those customers as a vital competitive differentiator. The provision of responsive customer service that goes “above and beyond” is critical to the success of their businesses.
4. Given their relatively small customer bases, such companies have more flexibility than the dominant TSPs and BDUs – who operate complex standardized national billing systems – to respond to individual customer needs.
5. CCSA has discussed this matter with its members who advise that, as a matter of standard

practice, they provide paper bills upon request to their customers.

6. As such, CCSA members respond to the needs of vulnerable constituencies among their customer bases to the extent they are able.
7. For those reasons, CCSA submits that there is no problem that warrants regulatory intervention with respect to the billing practices of those smaller TSPs and BDUs.
8. To the extent that the Commission determines that regulatory intervention is required in this area, smaller TSPs and BDUs should be exempted from such regulation.
9. CCSA thanks the Commission for the opportunity to provide these comments.

Sincerely,



Christopher J. Edwards
Vice-President, Regulatory Affairs