



Telecom Order CRTC 2025-318

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Gatineau, 28 November 2025

Public record: Tariff Notice 125

City West Cable & Telephone Corp. – Withdrawal of Billing and Collection Service

Summary

The Commission received an application from City West Cable & Telephone Corp. (CityWest) proposing to withdraw its Billing and Collection Service – Type 2 under Item 9, pages 2-24 and 2-25 of its General Tariff.

Billing and Collection Service – Type 2 allows CityWest to provide billing and collection functions to service providers for eligible message toll service calls. This is a legacy telephone service, and its last known use was in September 2022. The sole customer of this service advised CityWest that it wished to terminate its Billing and Collection Services Agreement due to a lack of demand and use of the service. Accordingly, the Commission approves CityWest’s application.

A dissenting opinion by Commissioner Bram Abramson is attached to this order.

Application

1. On 20 May 2025, the Commission received an application from City West Cable & Telephone Corp. (CityWest) proposing to withdraw its Billing and Collection Service – Type 2 under Item 9, pages 2-24 and 2-25 of its General Tariff.
2. Billing and Collection Service – Type 2 allows CityWest to provide billing and collection functions to a service provider, typically an interexchange carrier (IXC) or reseller, for eligible message toll service calls. It is provided through a Billing and Collection Services Agreement between CityWest and any participating IXC or reseller.
3. CityWest submitted that TELUS Communications Inc. (TELUS), the only customer currently subscribed to this service, notified CityWest in November 2024 that it wished to terminate the Billing and Collection Services Agreement. TELUS explained that it had observed no customer use of the service in 2024. Furthermore, CityWest’s records confirm that the service has not been used since September 2022. A test call placed by TELUS in January 2025 further demonstrated that while the service remained active, it was no longer being used by customers.
4. CityWest requested an effective date of 31 July 2025.

5. The Commission did not receive any interventions with regard to the application.

Commission's analysis

6. In compliance with the procedure set out in Telecom Information Bulletin 2010-455-1, CityWest provided the Commission with (i) a description of the service proposed to be withdrawn, (ii) the proposed withdrawal date, (iii) the rationale for the withdrawal, and (iv) the number of customers affected.
7. CityWest's Billing and Collection Service – Type 2 is a legacy service whose last active customer has requested to terminate its service. CityWest confirmed that it has had no demand from other potential customers for this service.
8. The Commission considers that the service is obsolete, especially in light of the rise in mobile wireless coverage and services with unlimited long-distance features. This is consistent with past Commission decisions, such as Telecom Order 2025-235.
9. Moreover, maintaining legacy services that have no remaining demand can result in ongoing administrative and compliance efforts that offer limited public benefit.

Conclusion

10. In light of all of the above, the Commission approves, by majority decision, CityWest's application.
11. Revised tariff pages are to be issued within 10 calendar days of the date of this order. Revised tariff pages can be submitted to the Commission without a description page or a request for approval; a tariff application is not required.

Secretary General

Related documents

- *Bell Canada – Tariff Notice 7716 – Destandardization of DS-1 Access services*, Telecom Order CRTC 2025-282, 30 October 2025
- *Bell Canada – Tariff Notice 988 – Destandardization of DS-1 Access services*, Telecom Order CRTC 2025-281, 30 October 2025
- *Bell Canada – Application to review and vary Telecom Decisions 2021-131 and 2022-160*, Telecom Decision CRTC 2025-239, 12 September 2025
- *Bell Aliant Regional Communications, Limited Partnership – Hospital Patient Telephone Service – Withdrawal and replacement with alternative services*, Telecom Order CRTC 2025-235, 10 September 2025
- *Updates to the competitive local exchange carrier model tariffs*, Telecom Order CRTC 2025-234, 10 September 2025

- *TELUS Communications Inc. – Withdrawal of Internet Voice Access Service*, Telecom Order CRTC 2025-228, 5 September 2025
- *Saskatchewan Telecommunications – Removal of print directory obligation*, Telecom Order CRTC 2025-207, 15 August 2025
- *Northwestel Inc. – Introduction of Winback Discount for Residential Unlimited Internet Packages*, Telecom Order CRTC 2025-74, 10 March 2025
- *Bell Canada – Tariff Notice 7692 – Introduction of Service Provided in Out-of-Footprint Territory*, Telecom Order CRTC 2024-214, 20 September 2024
- *TELUS Communications Inc. – Application for forbearance from the regulation of billing and collection service*, Telecom Decision CRTC 2018-84, 7 March 2018
- *Bell Canada – Application for forbearance from the regulation of billing and collection service*, Telecom Decision CRTC 2018-83, 7 March 2018
- *Approval processes for tariff applications and intercarrier agreements*, Telecom Information Bulletin CRTC 2010-455-1, 19 February 2016
- *Review of wholesale wireline services and associated policies*, Telecom Regulatory Policy CRTC 2015-326, 22 July 2015
- *Bell Canada et al.'s application to review and vary Telecom Decision 2008-17 with respect to wholesale billing and collection service*, Telecom Decision CRTC 2008-119, 11 December 2008
- *Revised regulatory framework for wholesale services and definition of essential service*, Telecom Decision CRTC 2008-17, 3 March 2008
- *Long-distance competition and improved service for Northwestel customers*, Telecom Decision CRTC 2000-746, 30 November 2000
- *Review of contribution regime of independent telephone companies in Ontario and Quebec*, Telecom Decision CRTC 99-5, 21 April 1999
- *Regulatory framework - Prince Rupert City Telephones*, Telecom Decision CRTC 98-5, 4 May 1998
- *Local competition*, Telecom Decision CRTC 97-8, 1 May 1997
- *Competition in the provision of public long distance voice telephone services and related resale and sharing issues*, Telecom Decision CRTC 92-12, 12 June 1992

Dissenting opinion of Commissioner Bram Abramson

1. Billing and Collection Service (BCS) was introduced in 1992 to support long-distance competition. It lets consumers use alternative telecommunications providers with which they have no prior relationship; the consumer settles the bill with their existing phone company instead. Services typically offered this way include:
 - casual long distance (also known as 10-10), collect call, and bill-to-third-party call services; and
 - 900 and 976 services, including both stand-alone audiotex or interactive services; and broadcast-paired formats, such as call-in television quiz shows.
2. BCS is a mandated service. Until this decision of the Telecommunications Committee,¹ all incumbent and competitive local exchange carriers (ILECs and CLECs) were required to provide it. Withdrawing the service for a small ILEC territory without addressing its underlying mandate (a) breaks with the Commission's established approach; (b) collides awkwardly with contemporaneous related applications; and (c) introduces uncertainty into our long-distance competition and public switched telephone network (PSTN) wind-down frameworks.
3. At issue is not whether we continue to modernize our regulatory frameworks, but how. The public is entitled to an approach that is reasoned, methodical, and efficient. This decision does not meet that standard. It risks entrenching a tangle of inconsistent applications and decisions to come. That is neither an efficient nor a coherent way to discharge our role.

Is the mandate rescinded or not?

4. City West Cable & Telephone Corp.'s (City West) application is not the first time carriers have sought to shed BCS from their LEC obligations. BCS's mandatory framework was established between 1992 and 2000;² continued in 2008 as a mandated interconnection service on the express finding that "it would be

¹ On behalf of the Commission: *Telecommunications Committee*, By-Law No. 10 (CRTC), paragraph (e) ("[a]ny act or thing done by the Telecommunications Committee shall be deemed to be an act or thing done by the members [...]"), pursuant to paragraph 11(1)(b) and subsection 12(3) of the *Canadian Radio-television and Telecommunications Commission Act* (duties delegated to standing committees by by-law). Delegation to standing committees, whose remit is made explicit through by-law, may be distinguished from other forms of delegation, like assigning a particular file to a panel (*Shoan v. Canada (Attorney General)*, 2016 FCA 261, para 6).

² Telecom Decision 92-12, section V.C.4(b) (ILECs); Telecom Decision 97-8, paragraph 190 (CLECs); Telecom Decision 98-5, section V.D (CityTel, as it then was); Telecom Decision 99-5, paragraphs 161-162 (other small ILECs, including CityWest); Telecom Decision 2000-746, paragraph 56 (Northwestel Inc.).

unreasonable to require long distance service providers to interconnect at each ILEC end-office”;³ and confirmed again in 2018, when the Commission described BCS as

an integral and important component of a regulatory policy (i.e. equal access) that was established to enable long distance competition and that still applies today. Any changes to the regulatory status of BCS would have an impact on the equal access regulatory policy and on the long distance competitive framework.⁴

5. Our conclusion that BCS must be reviewed within the long-distance competitive framework was expressly articulated through the Essentiality Test. That test, in its current form adopted in 2015,⁵ crystallizes the Commission’s long-standing approach to assessing mandated services.
6. That the majority confines its assessment of a mandated service to the status of a “legacy service” based on a small ILEC’s demand, rather than applying the Essentiality Test in the broader context of long-distance competition, breaks with that approach. It renders BCS’s current status uncertain.

Weren’t we already looking at this?

7. The difficulty is compounded by the fact that we reviewed City West’s 20 May 2025 application in isolation when other applications, already before the Commission, concerned the same equal-access obligations.
8. On 23 November 2023, the CRTC Interconnection Steering Committee’s Business Process Working Group (BPWG) filed Task Identification Form report BPRE103c, including revised CLEC model tariffs and an updated user’s guide. These revisions continued to require CLECs to provide BCS. We approved the revised CLEC tariffs on 10 September 2025, several months after City West’s application was filed.⁶
9. On 17 April 2025, the Commission published Bell Canada’s application seeking, among other things, to remove what Bell Canada characterizes as “antiquated equal access obligations” for ILECs providing mobile PSTN primary exchange service (PES) with Canada-wide calling.⁷ As the Commission has already found, billing and collection services are an integral and important component of those equal access

³ Telecom Decision 2008-17, paragraph 105, as confirmed and further elaborated in Telecom Decision 2008-119.

⁴ Telecom Decision 2018-83, paragraph 57; Telecom Decision 2018-84, paragraph 44.

⁵ Telecom Regulatory Policy 2015-326, cited at paragraph 6 of Telecom Decisions 2018-83 and 2018-84.

⁶ Telecom Order 2025-234, approving BPWG report BPRE103c and version 37.2 of the CLEC Model Tariff: see Part C, Item 305 (Type I/II CLECs) and Part C, Item 300 (Type III/IV CLECs).

⁷ *Adapting the regulatory framework for mobile wireless primary exchange service*, Bell Canada, Part 1 Application (CRTC File 8663-B2-202501700), 9 April 2025 (“Mobile PES Application”), paragraph 10.

obligations.⁸ Bell Canada’s application, filed a month before City West’s, remains open.

10. The Commission ought to be coherent in how it addresses equal-access obligations, both in applying its long-standing methodology and in managing related applications. Sequencing or consolidating these matters would have presented a clearer, more efficient path for interveners and the Commission, consistent with our 2018 BCS forbearance decisions. That path would have enhanced coherence, predictability, and efficiency. I respectfully disagree with the majority’s decision not to take it.

Where do we go from here?

11. The incumbent Prince Rupert wireline services to which the majority’s decision applies will affect few subscribers. It does not even apply to City West’s own CLEC operations, which will continue to provide BCS absent a further decision. So why dwell on the matter? Why lift this tariff application from what I have elsewhere referred to as an obscured rocket docket, or conveyor-belt processing,⁹ and hold it up against our broader approach?
12. Partly because due process should not ride a conveyor belt: changing course through a minor file invites the arbitrary *ad-hoc*-ery I have elsewhere rued.¹⁰ Partly because taking care only under the spotlight’s glare invites doubt about our diligence when the light shines elsewhere.
13. But largely because what I view, with due respect, as deficiencies arising from decontextualized analysis reach well beyond Prince Rupert, British Columbia. In failing to apply the Essentiality Test or even consider that BCS is a mandated service in the first place, the majority’s decision does not apply the appropriate methodology, nor achieve requisite coherence with past decisions or, potentially, current ones. It entrenches a confusing precedent,¹¹ with predictable follow-up applications and associated administrative costs. I dissent.

⁸ Mobile PES Application, paragraph 45; footnote 4, above.

⁹ See dissents attached to Telecom Orders 2025-74 and 2025-282.

¹⁰ See, e.g., dissents attached to Telecom Order 2024-214, at paragraph 10; Telecom Order 2025-207, at paragraphs 6-7; Telecom Order 2025-228, at paragraph 7; Telecom Decision 2025-239, at paragraph 15; and Telecom Order 2025-281, at paragraph 4.

¹¹ To avoid confusion, note that by “precedent” I refer, of course, to persuasive precedent insofar as it establishes both a foothold in the Commission’s practice, and shapes the legitimate expectations of stakeholders. We must, of course, always reserve our discretion as to how persuasive prior pronouncement ought to be since, “[a]s a matter of law ... while the CRTC may refer to and take guidance from its earlier decisions, those decisions cannot dictate its subsequent decisions. The CRTC is not bound by precedent and has a legal obligation not to fetter its discretion.” In other words, we must in each case weigh the positive value of predictability and stable precedents against the substantive facts before us, revising or qualifying our frameworks as the facts demand: “[o]nly procedural expectations are protected, not substantive expectations such as an expectation that a particular methodology would be followed.” *Bell Canada v. Canada (Attorney General)*, 2011 FC 1120 (CanLII), paras 88-90; *TekSavvy Solutions Inc. v. Bell Canada*, 2024 FCA 121 (CanLII), para 46.