



Telecom Decision CRTC 2025-342

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Reference: Part 1 application posted on 6 March 2025

Gatineau, 16 December 2025

Public record: 8622-J64-202501064

Iristel Inc. – Request for final relief with respect to a notice of disconnection of telecommunications services issued by Bell Canada

Summary

On 28 February 2025, the Commission received an application from Iristel Inc. (Iristel) seeking relief with respect to a notice of disconnection of telecommunications services issued by Bell Canada on 21 February 2025.

This application is part of an ongoing dispute between Iristel and Bell Canada, which has been the subject of other applications, including those that resulted in Telecom Decisions 2024-141 and 2025-157.

In this application, Iristel is seeking relief from violations it alleges took place after the issuance of Telecom Decision 2024-141. In particular, Iristel alleges that Bell Canada acted contrary to both its General Tariff and the *Telecommunications Act* when it issued the disconnection notice and imposed late payment charges (LPCs) on Iristel. Iristel is therefore seeking a Commission determination confirming its position.

In this decision, the Commission finds that (i) Bell Canada is permitted to issue LPCs to Iristel and (ii) Iristel should pay Bell Canada the overdue amounts in full, including LPCs, or negotiate a reasonable deferred payment agreement. Accordingly, the Commission denies this application.

Background

1. On 3 October 2023, the Commission received an application from Iristel Inc. (Iristel) describing the company's ongoing disputes with Bell Canada and Northwestel Inc. (Northwestel) regarding payment for telecommunications services. The dispute began when Bell Canada and Northwestel each issued, in September 2023, a 30-day disconnection notice to Iristel for failing to maintain its accounts in good standing.
2. In that application, Iristel requested that the Commission direct Bell Canada and Northwestel to withdraw their notices of disconnection. In Telecom Decision 2024-141, the Commission denied Iristel's application, stating that Iristel should either pay the overdue amounts or negotiate payment plans to avoid disconnection and, ultimately, service disruption for its customers.

3. On 21 February 2025, Bell Canada issued a new disconnection notice to Iristel, specifying a 28 February 2025 deadline for Iristel to either make payment in full or enter into a new deferred payment agreement. Bell Canada advised Iristel that it may otherwise disconnect certain services it provides to Iristel on 3 March 2025.

Application

4. On 28 February 2025, Iristel filed this application requesting that the Commission find that Bell Canada is not permitted to:
 - disconnect any telecommunications services for which there are no amounts owing, including shared-cost interconnection facilities;
 - issue late payment charges (LPCs) to Iristel; or
 - disconnect the telecommunications services it provides to Iristel because Iristel is willing to enter into and honour a reasonable deferred payment agreement.
5. Iristel also requested the following interim relief:
 - an expedited direction to Bell Canada to withdraw the disconnection notice issued to Iristel on 21 February 2025;
 - a direction to Bell Canada not to issue a new disconnection notice until the Commission rules on the final relief requested by Iristel in its application; and
 - a direction to Bell Canada that requires it to accept the payment plan proposed by Iristel.
6. The Commission addressed the interim relief request in a Secretary General [letter](#) dated 8 April 2025.
7. The Commission did not receive any interventions in response to the application.

Issues

8. The Commission has identified the following issues to be addressed in this decision:
 - Is Bell Canada permitted to disconnect telecommunications services for which there are no amounts owing?
 - Is Bell Canada permitted to issue LPCs to Iristel?
 - Is Bell Canada permitted to disconnect the services it provides to Iristel if Iristel is willing to enter into and honour a reasonable deferred payment agreement?

Is Bell Canada permitted to disconnect telecommunications services for which there are no amounts owing?

Positions of parties

9. Iristel alleged that Bell Canada was threatening to disconnect telecommunications services for which there were no amounts owing, including shared-cost interconnection facilities.
10. Iristel submitted that it received correspondence from Bell Canada indicating that some services with no amounts owing could be disconnected. The accounts in question included interconnection facilities, the costs for which it shared with Bell Canada, such as Signalling System 7 (SS7) Links and Bill and Keep Trunks.
11. In its response, Bell Canada indicated that some of the relevant accounts comprise a mix of associated services, which is why some services with no amounts owing were included. Bell Canada clarified that it would not disconnect services with no amounts owing.
12. Bell Canada also noted that a “threat” of disconnection of such services would not constitute a tariff violation, since neither the relevant tariff nor the *Telecommunications Act* (the Act) prohibits such actions.

Commission’s analysis

13. Given that Bell Canada has not disconnected telecommunications services for which there are no amounts owing and has confirmed that it does not intend to do so, the Commission considers that a decision is no longer required regarding this matter.
14. However, the Commission notes that it would be unacceptable for a company with market power to threaten to disconnect services without a reasonable basis for doing so.

Is Bell Canada permitted to issue LPCs to Iristel?

Positions of parties

15. Iristel submitted that a significant portion of the outstanding balance Bell Canada claims it is owed is the result of the unjust imposition of LPCs. It added that Bell Canada is in contravention of its [General Tariff](#), which states that no charge disputed by a customer can be considered past due unless Bell Canada has reasonable grounds to believe that the purpose of the dispute is to evade or delay payment.¹
16. Iristel indicated that it was disputing charges issued by Bell Canada because Bell Canada committed several violations of its General Tariff. It added that this dispute is the subject of ongoing litigation between the companies and was the subject of a review and vary application, which has since led to Telecom Decision 2025-157.
17. Bell Canada submitted that Iristel’s justifications for avoiding LPCs are without merit. Bell Canada noted that its General Tariff does not prohibit it from considering a customer’s

¹ Bell Canada General Tariff, Item 10, article 17.3.

disputed charges as past due if it has reasonable grounds for believing that the purpose of the dispute is to evade or delay payment.

18. Further, Bell Canada noted that in Iristel's original application, it did not dispute that the overdue balance is owing to Bell Canada. Rather, Iristel admitted that it was withholding payment from Bell Canada because of an interconnection dispute.
19. Bell Canada claimed that it had reasonable grounds to believe that Iristel was attempting to evade or delay payment and that it is therefore justified in issuing LPCs. Bell Canada suggested that Iristel has accepted the Commission's previous decisions regarding the notices of disconnection issued by Bell Canada, having explicitly stated in its review and vary application² that it was not seeking to change the Commission's determinations regarding the notices of disconnection.
20. Bell Canada also cited paragraph 48 of Telecom Decision 2024-141, in which the Commission stated that the company's tariff provides a mechanism for disputing charges, which does not include the customer resorting to self-help measures such as withholding payments during a dispute.
21. Bell Canada submitted that Iristel was therefore not justified in withholding payment during this dispute, including the payment of LPCs.

Commission's analysis

22. In the proceeding that led to Telecom Decision 2024-141, Iristel stated that it was withholding the amounts at issue as a self-help measure related to ongoing civil litigation.
23. In Telecom Decision 2024-141, the Commission determined that Iristel should either pay the overdue amounts it owes to Bell Canada or negotiate payment plans to avoid disconnection. Although Iristel subsequently filed an application to review and vary that decision, it did not ask the Commission to change its findings on the amounts owed or the need for Iristel to pay them.
24. Item 10, article 17.3 of Bell Canada's General Tariff states that no charge disputed by a customer can be considered past due. In this context, a disputed charge would generally be an amount invoiced by the wholesale provider for which the customer believes it did not receive the associated service or the level or quality of service detailed in the contractual agreement or tariff. That is not the case in the current dispute between Bell Canada and Iristel.
25. The dispute referred to by Iristel is about tariff violations related to points of interconnection, not about the monthly services provided and invoiced. The payments were withheld as a self-help measure. The Commission therefore considers that the amounts do not qualify as disputed charges under Bell Canada's General Tariff.

² See paragraph 4 of [Iristel's application to review and vary Telecom Decision 2024-141](#), submitted on 30 August 2024.

26. In light of the above, the Commission is of the view that Bell Canada was correct to consider that the amounts at issue are past due and can therefore incur LPCs. Accordingly, the Commission finds that Bell Canada is permitted to issue LPCs to Iristel.

Is Bell Canada permitted to disconnect the services it provides to Iristel if Iristel is willing to enter into and honour a reasonable deferred payment agreement?

Positions of parties

27. Iristel alleged that Bell Canada is refusing Iristel's payment plan, in contravention of its General Tariff, which states that Bell Canada may not suspend or terminate service where the customer is prepared to enter into and honour a reasonable deferred payment agreement.³
28. Iristel claimed that its proposed payment plan is reasonable because it enables Bell Canada to be compensated for ongoing services it provides to Iristel while also steadily reducing Iristel's outstanding balance.
29. Iristel indicated that it has continued paying substantial amounts to Bell Canada throughout the dispute. It added that these payments demonstrate that the company is operating in good faith and making reasonable efforts to resolve any outstanding balances that are owing to Bell Canada.
30. Iristel also indicated that because it is willing to enter into and honour a reasonable deferred payment agreement, the Commission should determine that Bell Canada is not permitted to disconnect the telecommunications services it provides to Iristel.
31. Bell Canada submitted that, in filing its application, Iristel was attempting to delay payment. It added that the Commission already determined, in Telecom Decision 2024-141, that Iristel should either pay the overdue amounts or negotiate payment plans to avoid disconnection.
32. Bell Canada also claimed that (i) Iristel has refused to pay the overdue amounts in full, (ii) Bell Canada is entitled to issue LPCs per its General Tariff, and (iii) Iristel has had a substantial outstanding balance for years and has not made good faith efforts to bring it to zero while paying its current accounts in full, including LPCs, despite the Commission requiring it to do so.
33. Bell Canada submitted that, given its history with Iristel, it has reasonable grounds to believe that Iristel is seeking to evade or delay payment and that it is entitled to disconnect the telecommunications services it provides to Iristel for non-payment.

Commission's analysis

34. Given the Commission's determination that Bell Canada is permitted to issue LPCs to Iristel, Iristel's proposed payment plan cannot be considered reasonable because it does not include any LPCs. Further, if Bell Canada continues to issue LPCs to Iristel, which it is entitled to do

³ Bell Canada General Tariff, Item 10, article 22.2(c).

under its General Tariff, the amount owing would continue to increase over time under Iristel's proposed payment plan.

35. The Commission considers that a different payment plan could be negotiated that allows for reasonable and feasible payments while ensuring that the amounts owed are paid over a suitable period. The Commission encourages both parties to arrive at a reasonable payment plan to avoid disconnection and limit any impact on customers.
36. In light of the above, the Commission considers that Bell Canada is permitted to disconnect the telecommunications services it provides to Iristel if Iristel is not prepared to enter into and honour a reasonable deferred payment agreement, which involves the payment of all monies owed.
37. In the event that the only amounts owed to Bell Canada are LPCs, the Commission reminds Bell Canada that (i) LPCs are non-tariffed charges⁴ and (ii) Bell Canada is not permitted to disconnect services for failure to pay non-tariffed charges.⁵

Consumer protection measures

38. In the 8 April 2025 Secretary General letter regarding Iristel's request for interim relief, the Commission noted that it takes seriously the impact that a disconnection would have on Iristel's customers, many of whom reside in rural, remote, and Indigenous communities.
39. In that letter the Commission directed:
 - Iristel to make payments based on Iristel's proposed payment plan. The Commission's requirements regarding these payments were provided separately and in confidence to Iristel and Bell Canada;
 - Bell Canada to refrain from disconnecting Iristel from the services Bell Canada currently provides, conditional on Iristel making the directed monthly payments to Bell Canada, until the Commission rules on Iristel's final relief requests; and
 - Bell Canada to notify the Commission whether payments have been received, within five days of each scheduled payment date.
40. The Commission also found that, should Iristel not make the required payments, Bell Canada must provide a notice of disconnection to Iristel no less than 45 days before any disconnection date. If this occurred, the Commission also directed:
 - Bell Canada to provide the notice to the Commission at the same time as to Iristel; and
 - Iristel to, within 14 days of receipt of any 45-day notice of disconnection from Bell Canada, provide notice of a potential disconnection to all of its affected end-user

⁴ See article 17.1, Item 10, of Bell Canada's General Tariff and paragraph 40 of Telecom Regulatory Policy 2009-424.

⁵ See article 22.2(a), Item 10, of Bell Canada's General Tariff.

customers and wholesale customers. Any wholesale customers of Iristel must also provide their end-user customers with notice in accordance with Telecom Regulatory Policy 2017-235. A copy of any such notice from Iristel or any telecommunications service provider that uses Iristel's services must also be provided to the Commission.

41. In the event that Iristel and Bell Canada do not reach a payment agreement for the amounts owed and that Bell Canada decides again to disconnect the services it provides to Iristel, the Commission considers that the concerns it raised in the 8 April 2025 Secretary General letter will still be relevant. Therefore, the measures it put in place to mitigate those concerns remain appropriate in the context of Iristel's request for final relief.
42. Accordingly, the companies are required to abide by the notification requirements set out in the 8 April 2025 Secretary General letter.

Conclusion

43. In light of all of the above, the Commission finds that (i) Bell Canada is permitted to issue LPCs to Iristel and (ii) Iristel should pay Bell Canada the overdue amounts in full, including LPCs, or negotiate a reasonable deferred payment agreement.
44. If parties are unable to reach a payment agreement and Bell Canada decides to disconnect services, they must follow the measures already outlined by the Commission in the 8 April 2025 Secretary General letter.
45. Accordingly, the Commission denies this application for final relief.
46. The Commission nonetheless reminds parties that it is unacceptable for a company to threaten to disconnect services without a reasonable basis for doing so.

Secretary General

Related documents

- *Iristel Inc. – Application to review and vary Telecom Decision 2024-141 regarding notices of disconnection of telecommunications services issued by Bell Canada and Northwestel Inc., Telecom Decision CRTC 2025-157, 23 June 2025*
- *Iristel Inc. – Request for relief against Bell Canada and Northwestel Inc. with respect to notices of disconnection of telecommunications services, Telecom Decision CRTC 2024-141, 27 June 2024*
- *Disconnection practices between telecommunications service providers, Telecom Regulatory Policy CRTC 2017-235, 6 July 2017*
- *Revised regulatory requirements for management of customer accounts, Telecom Regulatory Policy CRTC 2009-424, 17 July 2009*