



## Telecom Decision CRTC 2026-30

PDF version

Reference: Part 1 application posted on 24 December 2024

Gatineau, 13 February 2026

*Public record: 8665-J136-202406438*

### **InnSys Inc. – Application regarding the participation of small telecommunications service providers in the Commission for Complaints for Telecom-television Services Inc.**

#### **Summary**

The Commission for Complaints for Telecom-television Services Inc. (CCTS) is an independent organization that helps Canadians resolve issues with their telecommunications and television service providers. Telecommunications service providers (TSPs) are required to participate in the CCTS and to fund it through an annual fee and a fee for each customer complaint accepted by the CCTS. Meanwhile, the CCTS's complaint-resolution services are free for TSPs' customers.

InnSys Inc. (InnSys) submitted an application in which it raised several issues regarding the relationship between the CCTS and small TSPs. Among them was InnSys's claim that the CCTS's processes and fees disproportionately burden small TSPs and cannot be disputed effectively due to the absence of a recourse mechanism. InnSys also proposed that the Commission review some of the CCTS's processes and fees.

The Commission received submissions from industry associations and an individual expressing differing opinions on InnSys's application. Based on the public record, the Commission finds that several of the issues raised by InnSys have either been addressed by the CCTS or are out of the scope of this decision, but two of them warrant examination. Accordingly, the Commission is launching Telecom Notice of Consultation 2026-31 to consult on the issues identified in this decision.

#### **Background**

1. The Commission for Complaints for Telecom-television Services Inc. (CCTS) is an independent, not-for-profit organization that assists in resolving issues between telecommunications and television service providers and their customers. It works to provide fair, impartial, and effective complaint-resolution services, data, and insights.

2. The CCTS was established by several telecommunications service providers (TSPs) in response to an Order in Council issued by the Government of Canada in 2007,<sup>1</sup> which indicates that all TSPs should participate in the CCTS and contribute to its funding. The 2007 Order in Council also states that the CCTS should serve individual and small-business retail customers.
3. In Broadcasting and Telecom Regulatory Policy 2016-102, the Commission reaffirmed the requirement that all TSPs participate in the CCTS.
4. In 2023, the CCTS ended InnSys Inc.'s (InnSys) participation in its organization for not paying complaint-based and annual fees, which brought InnSys into apparent non-compliance with the CCTS's participation requirement. InnSys indicated that it stopped paying the CCTS's fees to protest its complaint-based fee structure, which, according to InnSys, continues to unfairly burden small TSPs.

## **Application**

5. On 20 December 2024, the Commission received an application from InnSys alleging that the complaint-based fees applied by the CCTS disproportionately burden small TSPs and that the CCTS lacks a clear and transparent process through which TSPs can dispute those and other CCTS fees.
6. In its application, InnSys requested that the Commission:
  - establish a clear and transparent process enabling TSPs to dispute CCTS fees;
  - streamline the CCTS's complaint process;
  - review the CCTS's complaint-based fee structure to determine if it disproportionately burdens small TSPs; and
  - review the CCTS's promotional requirement.
7. The Commission received interventions from the Canadian Telecommunications Association, the Canadian Association of Wireless Internet Service Providers, the Independent Telecommunications Providers Association, the CCTS, and one individual.

## **Issues**

8. This decision will not address two of InnSys's requests for the reasons that follow:

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<sup>1</sup> [Order requiring the CRTC to report to the Governor in Council on consumer complaints, Order in Council P.C. 2007-533, 4 April 2007.](#)

- The request for the CCTS to streamline its complaint process was directly addressed by the CCTS when it explained in its intervention how it updated its complaint process following consultations with its stakeholders.
  - The current measures used by the CCTS and TSPs to promote the CCTS will be addressed in a future proceeding.
9. Consequently, the Commission has identified the following issues to be addressed in this decision:
- Does the CCTS’s complaint-based fee structure disproportionately burden small TSPs?
  - Does the CCTS have an effective fee dispute mechanism?
10. In light of additional concerns raised by InnSys on the record of this proceeding, this decision will also address the following in the “Other issues” section below:
- the CCTS’s alleged use of “name and shame” tactics, which InnSys claims cause reputational harm; and
  - the rates being charged by large TSPs for wholesale Internet access services, which InnSys finds difficult to compete with.

**Does the CCTS’s complaint-based fee structure disproportionately burden small TSPs?**

**Positions of parties**

***InnSys***

11. InnSys submitted that the CCTS’s complaint-based fee structure unfairly burdens small TSPs. InnSys also claimed that the CCTS applied unjust financial penalties toward it for complaints that were either baseless or for which InnSys was not at fault, with no recourse mechanism to dispute them.

***Interveners***

12. The Canadian Association of Wireless Internet Service Providers submitted that the CCTS’s regulatory obligations should be balanced, fair, and reflective of the diverse telecommunications landscape in Canada and emphasized that efforts to uphold such standards should consider the perspectives of small TSPs.
13. In its submissions, the CCTS provided context on its complaint resolution process, which it claimed to have reviewed and simplified after consulting with stakeholders, including small TSPs. It submitted that the process is free for retail customers, and that customer complaints

escalate up a complaint-resolution pyramid,<sup>2</sup> which was designed to incentivize an early resolution to complaints.

14. In its submissions, the CCTS also elaborated on the complaint-based fees that are associated with that process. The CCTS submitted that costs are recovered from fees charged equally to TSPs regardless of their size or whether they are considered at fault or not. The CCTS added that complaint-based fees increase as a complaint escalates up the complaint-resolution pyramid. It also explained that the current funding formula was approved by the CCTS's board of directors, and that any modification to the fee structure would require the approval of at least six of the seven board directors.
15. In its intervention, the CCTS submitted that it obtains some of its funding by charging annual participation fees. TSPs with greater than \$10 million in Canadian revenues are charged an annual fee proportional to that revenue. TSPs with less than \$10 million in Canadian revenues are charged an annual flat fee of \$100, which the CCTS notes has never increased. The CCTS added that approximately 70% of its revenue comes from revenue-based fees and 30% from complaint-based fees.
16. The CCTS also added that it had previously addressed barriers for small TSPs by eliminating the initial sign-up fee. Furthermore, after updating its billing process in 2023, the CCTS stopped charging fees for complaints that were later found to fall outside the scope of its mandate.
17. In its response to the Commission's request for information (RFI), the CCTS noted that TSPs with over \$10 million in revenues fund 98 to 99% of the CCTS's revenue and account for 97 to 98% of the complaints it reviews.

#### **Commission's analysis**

18. In response to the Commission's RFI, the CCTS submitted data that indicates that complaints filed against small TSPs are typically not addressed in the earlier stages of the complaint-resolution process, which results in small TSPs having a higher average charge per complaint than large TSPs. The Commission is of the view that this may be due to small TSPs' limited resources and staff.

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<sup>2</sup> The CCTS uses a multi-step process to resolve complaints. The first step is assessment of the complaint to determine whether it falls within the CCTS's mandate. The second step is the complaint's initial referral to the TSP, which has 20 days to respond to the complaint. If the complaint is not resolved at this step, it is escalated to the third step: conciliation and investigation. The final step is the outcome, where the TSP must implement any agreed-upon resolution. More information on this process can be found on the [CCTS's website](#).

19. Based on the record of this proceeding, the Commission considers that the CCTS's existing complaint-based fee structure may be a barrier for some small TSPs, which may prevent customer complaints from being resolved efficiently.
20. The Commission will examine the impact of the CCTS's complaint-based fee structure on small TSPs by gathering information through Telecom Notice of Consultation 2026-31, published today. This information will guide the Commission in deciding how to mitigate any impact on small TSPs, if necessary.

### **Does the CCTS have an effective fee dispute mechanism?**

#### **Positions of parties**

##### ***InnSys***

21. InnSys stated that the CCTS does not have an effective mechanism for settling disputes over fees between TSPs and the CCTS. It claimed that the absence of such a mechanism creates unfair situations where TSPs are given an ultimatum to either pay fees or have their participation in the CCTS end.
22. InnSys added that the CCTS had previously referred InnSys to its board of directors to discuss InnSys's concerns about complaint-based fees. InnSys claimed that it was informed that there were other similar complaints regarding the CCTS but that it was ultimately advised to "just pay and move on."

##### ***Interveners***

23. The Canadian Telecommunications Association emphasized the importance of maintaining a complaint-resolution process at the CCTS that is impartial, fair, and effective for all stakeholders involved. It also affirmed that it supports the need for greater transparency between TSPs and the CCTS.
24. The Independent Telecommunications Providers Association, which represents small rural facilities-based TSPs, submitted that its member companies find dealing with the CCTS cumbersome and time-consuming. It added that its member companies are generally sympathetic to some of the concerns raised by InnSys, such as being charged fees for complaints where they are not at fault and lacking a mechanism to contest them.
25. In response to the Commission's RFI, the CCTS stated that fees charged incorrectly can be disputed and corrected. The CCTS also submitted that TSPs do not incur charges for complaint referrals that are later determined to fall outside the scope of the CCTS's mandate. The CCTS does not, however, address disputes regarding fees, the content or outcome of complaints, or the procedures used to resolve them.

## **Commission's analysis**

26. The CCTS is an independent organization and as such, the Commission has not historically reviewed its operational practices, such as how it handles complaints. However, the Commission considers that, in this case, a fee dispute mechanism may lead to a more efficient and effective resolution for all parties. Such a mechanism could also potentially reduce the number of non-compliance referrals made by the CCTS to the Commission.
27. In light of the above, the Commission will examine whether there is a need to implement a fee dispute mechanism within the CCTS in Telecom Notice of Consultation 2026-31.

## **Other issues**

### **Positions of parties**

#### ***InnSys***

28. InnSys claimed that the deadlines set by the CCTS for addressing complaints were burdensome. InnSys submitted that, as a small TSP, it does not have enough resources to dedicate toward addressing complaints, which makes it difficult to meet those deadlines.
29. InnSys also opposed promoting the CCTS as required by the CCTS's Public Awareness Plan, which forms part of InnSys's obligations under the Participation Agreement that it signed with the CCTS. InnSys characterized these obligations as marketing.
30. Furthermore, InnSys outlined the difficulties it faces because of the CCTS's use of "name and shame" tactics, citing reputational harm.
31. Finally, InnSys raised concerns regarding its ability to compete with the rates being charged by large TSPs for wholesale Internet access services.

#### ***CCTS***

32. The CCTS explained that it consulted with stakeholders extensively on its complaint process over a two-year period and that InnSys had multiple opportunities to participate in that consultation. In May 2023, the CCTS launched an updated complaints management process. Some of the updates were designed to improve the experience of small TSPs, such as an update that enabled automatic extension-granting within a reasonable threshold and another update that improved plain language communication. The CCTS stated that it invested in supporting all TSPs in adopting the updated process. The CCTS noted that no complaints have been made against InnSys under the new complaints management process.
33. The CCTS submitted that its Public Awareness Plan is an obligation under the Participation Agreement that TSPs enter into with the CCTS, and that the Plan helps raise critical awareness among TSPs' retail customers.

## Commission's analysis

34. The Commission considers that InnSys's concerns regarding the CCTS's complaint resolution process were addressed when the CCTS launched its updated complaints management process. The CCTS conducted robust consultations on its complaint resolution process, which were open to InnSys for its participation.
35. The Commission notes that InnSys's concerns regarding the requirement to promote the CCTS will be reviewed in part within the context of a future proceeding. Regarding the current application submitted by InnSys, the Commission will not waive the requirement to promote the CCTS according to its participation agreement.
36. The Commission also notes that the CCTS had listed InnSys's participation ending on its website in keeping with expectations outlined in Broadcasting and Telecom Regulatory Policy 2016-102. The Commission encourages the CCTS to update its website to provide context on InnSys's alleged non-compliance and the Commission's related public proceedings. The Commission also encourages the CCTS to specify that the issues raised by InnSys will be examined as part of Telecom Notice of Consultation 2026-31.
37. The Commission considers that InnSys's concerns regarding interim rates for wholesale Internet access services were already addressed in Telecom Regulatory Policy 2024-180.

## Conclusion

38. In light of all of the above, the Commission considers that several of the issues raised by InnSys have either been addressed by the CCTS or are out of the scope of this decision, as noted above, and that the majority of the other concerns it raised will be addressed in Telecom Notice of Consultation 2026-31, published today.

## 2023 Policy Direction

39. The 2023 Policy Direction<sup>3</sup> directs the Commission to consider how its decisions promote competition, affordability, consumer interests, and innovation. Specifically, section 17 of the 2023 Policy Direction addresses consumer rights and directs the Commission to support the CCTS in a way that enables it to fulfill its mandate more effectively.
40. The Commission considers that this decision is consistent with the direction to enable the CCTS to fulfill its mandate more effectively, as Telecom Notice of Consultation 2026-31 will gather a

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<sup>3</sup> *Order Issuing a Direction to the CRTC on a Renewed Approach to Telecommunications Policy*, SOR/2023-23, 10 February 2023.

range of views on the policy issues raised in InnSys's application regarding the CCTS's complaint-based fee structure and related dispute mechanism.

Secretary General

### **Related documents**

- *Call for comments — The fee structure and fee dispute mechanism at the Commission for Complaints for Telecom-television Services Inc.*, Telecom Notice of Consultation CRTC 2026-31, 13 February 2026
- *Competition in Canada's Internet service markets*, Telecom Regulatory Policy CRTC 2024-180, 13 August 2024
- *Review of the structure and mandate of the Commissioner for Complaints for Telecommunications Services Inc.*, Broadcasting and Telecom Regulatory Policy CRTC 2016-102, 17 March 2016