



Telecom Notice of Consultation CRTC 2024-318

Making it easier for consumers to shop for Internet services

CRTC Reference No.: 1011-NOC2024-0318

Oral Remarks of OpenMedia

Melissa Dupuis-Crane, CIPPIC

1. Good afternoon, Mr. Vice-Chair and Commissioners.
2. My name is Melissa Dupuis-Crane, and I'm a Licensing Candidate at the Samuelson-Glushko Canadian Internet Policy and Public Interest Clinic, or CIPPIC. I'm here today with Jenna Fung from OpenMedia, a community-driven organization working to keep the Internet open, affordable, and surveillance-free.
3. CIPPIC and OpenMedia share a long-standing commitment to advancing the public interest in Canada's telecommunications landscape. We have no financial stake in the outcome of this proceeding, but the individuals and communities we represent do. For them, a lack of transparency in telecom markets translates directly into financial harm, stress, and a diminished ability to make informed choices.
4. We commend the Commission for the important steps it is taking under this proceeding. The introduction of broadband "nutrition labels" for home Internet plans is a welcome move toward transparency and fairness.
5. But we are urging the Commission to go further by extending those same standardized disclosure requirements to mobile services.
6. Mobile services are not a secondary concern. For many Canadians, mobile devices are their primary gateway to the Internet and essential public services. Yet when it comes to transparency and plan information, mobile users are being left behind.

Jenna Fung, OpenMedia

7. The public opinion research commissioned by the Commission shows that the problems faced by mobile and Internet consumers are virtually identical. 10% of mobile users and 13% of Internet users reported being dissatisfied with the information available to them. At the same time, just 23% of mobile users and 22% of Internet users said they were very satisfied.
8. But satisfaction metrics don't tell the whole story. What's more revealing is the persistent disconnect between how confident consumers feel at the point of purchase and what happens after they sign up. Respondents may say they're

satisfied with the information available to them. But that hasn't translated into fewer complaints or clearer understanding.

9. And those gaps show up in the real world. The CCTS's most recent annual report shows that wireless complaints are not going down, they're climbing. Wireless complaints reached a five-year high in 2023–24, making up 52% of all telecom complaints—a 27% increase from the previous year. The top issues listed were disclosure problems, billing errors, and broken promises around credits and promotions.
10. This tells us that even when consumers *think* they have the right information, the current system isn't helping them make confident, accurate choices. Consumers are being left in the dark, and they are paying the price. This proceeding gives the Commission a crucial opportunity to change that.

Melissa Dupuis-Crane, CIPPIC

11. The United States has taken action on broadband transparency by introducing standardized “nutrition labels” for Internet services. That's a useful model, but Canada has a chance to go further. The U.S. approach was designed to improve broadband access under infrastructure legislation. Here, the goal is broader: improving consumer protection across the board.
12. That makes it all the more striking that only Internet services are being considered for labels. Mobile users face the same lack of clarity, the same frustration, and the same need for reliable information.
13. If the Commission agrees that Internet customers deserve better tools to understand what they're paying for, the same logic must apply to mobile. Anything less creates an unjustified gap in protection and leaves millions of Canadians navigating the mobile market without the same basic support.
14. Our position is informed in part by your dissenting opinion in CRTC 2024-293, Commissioner Abramson. While that dissent addressed a different context, the call for a more data-driven and equity-aware approach to consumer protection resonates with the issues raised in this proceeding.

15. Commissioner Abramson expressed concern that, without structured and machine-readable formats, even well-intentioned transparency frameworks may fall short of their potential. That insight helped shape our recommendation to ensure all consumer labels are not only visible, but also machine-readable and publicly accessible in a centralized, open-data repository.
16. We therefore recommend that the Commission:
 - a. expand the nutrition label requirement to include mobile wireless services; and
 - b. require that labels be presented in machine-readable formats to support third-party tools and accessibility.
17. Machine-readable formats are essential to realizing the full potential of the label framework. By machine-readable, we mean formats like CSV or JSON—structured digital files that computers can easily parse and use without manual copying or reformatting.
18. They allow comparison tools, like PlanHub, WhistleOut, or tools built by consumer rights organizations, to automatically access and display current plan details in ways that are easy for consumers to navigate and act on. These tools help users filter by what matters to them, whether that's data limits, throttling policies, or international roaming charges.
19. A centralized, publicly accessible repository on the Commission's website would ensure that this information is not only accurate but consistent, complete, and auditable. It would extend the benefits of transparency beyond individual provider websites, supporting public literacy, digital inclusion, and better regulatory oversight.
20. The Commission has rightly recognized that empowering consumers with accurate and accessible information is a foundational part of its consumer protection mandate. We are simply asking that it apply that principle across the board.
21. As the 2023 Policy Direction emphasizes, "clarity and transparency of pricing information and service plan details" must be core to the Commission's decisions. A consumer can't shop wisely without the tools to compare. And in a marketplace as concentrated as Canada's, where competition is already limited, consumers can't afford to be kept in the dark.

22. Extending these disclosure rules to mobile plans is a practical and powerful way to strengthen competition, reduce harm, and show that the Commission is listening and acting in the interest of Canadians.
23. Thank you for your time and attention. We would be happy to take any questions.