



**CCSA Submission**

**T & BNC 2025- 227 RFI**

**Call for Comments- Consumer Protections in the  
Event of a Service Outage or Disruption**

October 9, 2025

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Marc Morin  
Secretary General  
Canadian Radio-television and  
Telecommunications Commission  
Gatineau, QC K1A 0N2

Dear Mr Morin:

**Re: Telecommunications and Broadcasting Notice of Consultation 2025-227: Call for Comments- Consumer protections in the event of a service outage or disruption.**

- 1 The CCSA is a national organization representing more than 100 small independent broadcasting distribution companies and ISPs that provide TV, internet, and telecommunications services to more than half a million Canadian residents and businesses in urban and rural communities, from coast to coast to coast.
- 2 CCSA thanks the Commission for being considered in the process in paragraph 24 of the Notice of Consultation. The involvement in the RFI as per paragraph 25 of that same Notice however, has little applicability to CCSA as a membership organization. Below are the responses as they pertain to the relevant (Broadcasting) questions of the RFI.

**Q1 - For each of the following services, explain your current policies relating to service outages or disruptions for both planned and unplanned service outages or disruption: (c) retail subscription television services provided as a BDU; and**

A1:

CCSA has no policies for service outages or disruptions with end-user customers. That would be an external issue to CCSA, between members who are BDUs and their customers. It would be beyond the scope of CCSA. In rare instances of planned outages by suppliers, once CCSA is notified, we ensure that our members are informed as quickly as possible.

**Q2 - Explain how these (Q1) policies are communicated to customers, including representative sample documents or web pages.**

A2:

CCSA does not interact with end-user customers of CCSA members.

**Q3 - For each of the following services, explain the current feasibility of detecting a service outage or disruption for a specific customer without being informed by the customer, addressing whether it depends on the underlying technology through which the customer receives their service: (c) retail subscription television services provided as a BDU;**

A3:

As discussed in questions 1 and 2 (above), CCSA has no relationships with the customers of its members. CCSA does not detect outages or disruptions.

**Q4 - If, for any service identified in question 3, you identified that it was not currently possible to detect a service outage or disruption for a specific customer and service without being informed by the customer, explain in detail the work required to make it feasible and any related costs you would expect to bear to update your systems.**

A4:

Please refer to answer 3. This is not applicable.

3 CCSA thanks the Commission for its involvement in this process and looks forward to contributing responses to the questions found in Appendix 2 of the Notice of Consultation.

Yours Sincerely,



John P. Roman