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Filed via My CRTC Account

Mr. Claude Doucet, Secretary General
Canadian Radio-television and Telecommunications Commission
1 Promenade du Portage
Gatineau, Quebec J8X 4B1

30 August 2018

RE: *Report regarding the retail sales practices of Canada's large telecommunications carriers, Telecom and Broadcasting Notice of Consultation CRTC 2018-246, 16 July 2018* ("TBNC 2018-246" or the "Notice"), **Procedural Request of TekSavvy to clarify inclusion of flanker brands of large carriers in responses to requests for information**

Dear Mr. Doucet:

On July 16, 2018, CRTC staff issued a letter requesting information about the retail sales practices of Canada's large telecommunications carriers for the above-noted proceeding.

TekSavvy notes that the telecom market includes flanker brands that are operated by incumbent carriers, providing both wireline and mobile services.¹ Where a respondent to the CRTC's RFIs operates a flanker brand for any of the services identified in the Order in Council, information about sales practices concerning that flanker brand should be included in that respondent's RFI responses.

Some of the RFI responses mention incumbents' flanker brands. For example:

- Rogers' response to the Commission's first question refers to its four brands: Rogers, FIDO, Chatr, and Cityfone.
- Shaw, in its cover letter, states that its response is submitted on behalf of Freedom Mobile Inc. Shaw further states that Shaw and Freedom have separate sales channels for their services.

¹ In the 2017 Communications Monitoring Report, the Commission defines "primary brand" as the brand most recognizable by consumers and is directly associated to the parent company that owns and operates the facilities to provide services. The CRTC stated that "flanker brand", also known as an extension or a secondary brand, is "used by the primary brand wireless service provider to market and offer varying services and plans to consumers." The primary brand's network is used to provide services under the flanker brand. TekSavvy notes that since November 2015, two primary brands have used flanker brands to market and offer services for wireline Internet service.

However, some incumbents' RFI responses did not mention whether the sales practices described in their response to the CRTC's requests for information included sales practices for their flanker brand products, or name the brands they were responding on behalf of.

Therefore, TekSavvy requests that the Commission ask each respondent to:

- (a) clarify whether their responses include information about sales practices for their flanker brands; and
- (b) identify the flanker brands covered by their responses.

Yours sincerely,

[transmitted electronically]

Janet Lo
VP, Privacy & Consumer Legal Affairs

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