



The CRTC and 21st century expectations of openness, transparency and accountability: a month of comments on how Parliament's delegate performs its responsibilities

25: Accountability means well-designed data collection to evaluate policy

25 March 2023

This is the twenty-fifth of a series of comments by FRPC about the openness, transparency and accountability of the Canadian Radio-television and Telecommunications Commission (CRTC). Parliament established the CRTC on 1 April 1968 and delegated responsibility to it for implementing Parliament's broadcasting and telecommunications policies for Canada.

The Ministers of Canadian Heritage and Innovation, Science and Economic Development wrote Chairperson Eatrides in early February 2023 to offer congratulations on her appointment to the Commission¹ and also to "inform her of the Government's vision and priorities with respect to Canada's broadcasting and telecommunications system".² The Ministers said they sensed "that public confidence and trust in the CRTC has waned in recent years", pointing to undue delays in its decision-making, unequal access to its processes and the insufficient reasoning, evidence and data in the CRTC's determinations ("decisions").

The 21st to 30th commentaries in this series consider the 'accountability' of the CRTC. As noted above, the Heritage and ISED Ministers are concerned that public trust and confidence in the CRTC has been decreasing. What the Ministers' letter elides, however, is the degree to which the CRTC is accountable for its performance, and whether it should be more accountable as it (to quote the Ministers) "implements the laws and regulations set forth by Parliament in the public interest".

In Canada, accountability is facilitated by the 'open court principle', described almost thirty years ago by the [Supreme Court in 1996](#) as "deeply embedded in the common law tradition" (paragraph 21). The Court affirmed that "ensuring that justice be done openly ... has now become 'one of the hallmarks of a democratic society' and... acts as a guarantee that justice is administered in a non-arbitrary manner, according to the rule of law" (paragraph 22).


Although the CRTC is not a Court but a [quasi-judicial administrative tribunal](#), publicly available information about its processes is also important to its accountability to enable Canadians to monitor the Commission, its operations and its outcomes. Apart from demonstrating that it is successfully implementing the objectives established by Parliament in the [Broadcasting Act](#), the [Telecommunications Act](#), the [Canada Elections Act](#), the [Accessible Canada Act](#) and the [Official Languages Act](#), information about its processes and their outcomes permits its policies to be evaluated. When done well, policy evaluation provides objective information to enable regulatory activities to be assessed both in terms of service delivery (timeliness and steps involved) or program outcomes (measures of specific parliamentary

¹ CRTC, "[Meet Vicky](#)" (accessed 1 March 2023).

² Department of Canadian Heritage, "[New CRTC Chair's Leadership Will Help Shape the Future of Canada's Communication System](#)", News release (Gatineau, 6 February 2023).



objectives). The federal Treasury Board Secretariat devotes part of its website to explaining and describing policy evaluation:

<div> Government of Canada / Gouvernement du Canada</div> <div>Canada.ca > About government > Government oversight > Audit and evaluation > Evaluation in the Government of Canada</div> <div><h2>Policy on Results: What is Evaluation?</h2><p>From: Treasury Board of Canada Secretariat</p><h3>On this page</h3><ul style="list-style-type: none">PurposeWhoHowEvaluation and Performance Measurement<p>Evaluations seek to systematically and neutrally gather and analyze evidence to assess whether, why and how a program, initiative or policy works, with the aim of informing decision making, improvement, innovation, and accountability. They and the evaluation functions in departments play an important role in the results agenda by providing the reservoir of evidence and expertise necessary to understand the results programs and initiatives have and how they can be improved.</p><p>This note answers:</p><ul style="list-style-type: none">What the purpose of evaluation isWho evaluations are done byHow evaluations are doneHow evaluation relates to performance measurement</div>	<h2>How</h2> <p>Evaluations typically use social science methods such as document reviews, interviews, surveys, case studies, focus groups, statistics and randomized control trials. They can look at a wide variety of sources to gather information, ranging from program beneficiaries to social media to predictive analytics based on big data. They can be conducted before a program is implemented, to inform its design; during a program, to help it adjust course; or after a program is complete or has been running for some time, to assess its impact.</p> <p>Common types of evaluations include:</p> <ul style="list-style-type: none">Impact evaluations, which focus on assessing the results of the program and understanding whether the program caused the resultsEconomic evaluations, which consider whether the program was cost-effective, or whether the costs justified the benefitsInnovation evaluations, which assess pilots where departments are experimenting with new approaches and want to determine efficacy and the feasibility of taking pilots to scaleDelivery/Process/Formative evaluations, which consider how to improve the implementation or delivery of the programTheory of Change evaluations, which explore and test the underlying assumptions of why and how a program worksDesign/Needs evaluations, which aim to develop or assess program design, or redesign an existing program
<p>https://www.canada.ca/en/treasury-board-secretariat/services/audit-evaluation/evaluation-government-canada/policy-results-what-evaluation.html</p>	

[Note 5 \(5 March 2023\)](#) in this series set out concerns about the lack of information regarding the main topic of Parliament's broadcasting policy – programming. The CRTC's decades-long decision not to publish annual 'report cards' on TV and radio programming services' achievements in broadcasting ever-increasing hours of Canadian audiovisual programming makes it impossible for most Canadians and members of Parliament to know how well these services are doing in implementing Parliament's broadcasting policy for the country.

This note focusses on the telecom side of the Commission's work, especially with respect to telemarketing. After Parliament gave the CRTC responsibility for telecommunications in the mid-1970s more and more people began to direct their complaints about various aspects of their telephone service to the Commission. The establishment in 2007 of the [Commissioner of Complaints for Telecommunications Services](#) (CCTS) – now the [Commission for Complaints for Telecom-television Services](#) – enabled the CRTC to focus more closely on enforcing the rules it had developed for automatic-dialling devices (often casually described as 'robo calls'), unsolicited telephone calls and telemarketing. It had first introduced [restrictions on the use of automatic dialling-announcing devices \(ADADs\) in 1985](#), for



instance, set rules for [unsolicited telephone calls in 1994](#), and [in 2001 extended its existing telemarketing rules to apply to all telecom service providers in Canada](#). The CRTC today has three sets of ‘rules’ or regulations: the National DNCL Rules, the Telemarketing Rules and the Automatic Dialing-Announcing Device (ADAD) Rules.

As the CRTC and others continued to receive complaints about unwanted telephone calls Parliament amended the *Telecommunications Act* in 2005 to require the CRTC to establish a “National Do Not Call List” and to empower it to levy administrative monetary penalties on those who break its rules.

The CRTC reports general information about its telecommunications enforcement activities in its *Departmental Results Reports*. In [2022](#) the Commission described its policies and activities “to protect Canadians against nuisance calls and spam” (pages 15 to 16) and mentioned that it had imposed \$873,997 in penalties “for alleged violations” of its Unsolicited Telecommunications Rules or ‘Canada’s Anti-Spam Legislation’ (CASL – being [An Act to promote the efficiency and adaptability of the Canadian economy by regulating certain activities that discourage reliance on electronic means of carrying out commercial activities, and to amend the Canadian Radio-television and Telecommunications Commission Act, the Competition Act, the Personal Information Protection and Electronic Documents Act and the Telecommunications Act](#)).

The CRTC also publishes more details about its enforcement activities in an annual report on the National Do Not Call List. The Commission’s [website currently provides links to five of these reports](#), for the years from 2018 to 2022. Other reports may be downloaded from the [Government of Canada Publications website](#). The reports show that the CRTC’s enforcement actions have evolved over time. It now has five levels of enforcement: warning letters, citations, notices of violation, settlements, undertakings and compliance and enforcement decisions.

Enforcement actions	CRTC description
Warning Letter	“procedural administrative action that brings to the attention of the violator a minor violation, in order for corrective action to be taken. Failure by a telemarketer to identify their name and phone number on a fax message or keep records related to their use of the National DNCL are examples of minor violations”
Citation	“Another procedural administrative action that alleges serious violations and is published on the CRTC’s website. It identifies the alleged violation(s) and notes the specific corrective action to be taken within a certain time frame. Activities to which the CRTC responds with a Citation include a telemarketer contacting a healthcare and/or emergency line, or a telemarketer not processing an internal do not call request at the time of the call.”
Negotiated settlement	“a formal agreement between an entity and the Chief Compliance and Enforcement Officer. When an investigation identifies serious violations, and specific actions by a business or individual are required to restore compliance, CRTC staff may contact the entity to discuss the possibility of a negotiated settlement. As part of this settlement, the entity must admit liability, cease violating the Rules, accept to receive a NoV with an AMP, and develop a compliance program. Negotiated settlements can be an effective option for organizations that have violated the Rules, since they save time and reduce cost, while achieving compliance”
Notice of Violation	“an enforcement tool set out in section 72.07 of the <i>Telecommunications Act</i> and is issued for more serious violations. It may carry with it an administrative monetary penalty (AMP). Factors that determine whether a Notice of Violation should be issued and what the amount of the AMP should be include the nature of the violation, the number and frequency of complaints and violations, the relative disincentive of the measure, and the potential for future violation. Notices of Violation are issued to telemarketers



Enforcement actions	CRTC description
	who engage in telemarketing without a valid registration or subscription to the National DNCL operator, or who call consumers whose telephone numbers are registered on the National DNCL”
Repeat violations	“Through ongoing monitoring and analysis of complaints data, the CRTC identified entities that continued to violate the Rules despite having been subject to enforcement actions by the CRTC in the past. The CRTC escalated its enforcement responses in cases of repeat violations. For example, a telemarketer that was issued an administrative monetary penalty (AMP) of \$10,000 for violations of the Rules in 2013 was issued an additional AMP of \$140,000 in 2015 for continued violations of the Rules.”
Source: Warning letter, citation, and notice of violation - CRTC, Report on the Operation of the National Do Not Call List for the period April 1, 2013 to March 31, 2014 Negotiated settlement – first described in footnote 3 of the 2013-2014 Report on the National Do Not Call List, then in the 2015-2016 report at page 14 Repeat violations – addressed at p. 14 of the 2015-2016 report	

According to the National Do Not Call List reports, the number of complaints received by the CRTC about unsolicited telecommunications decreased from 2011/12 to 2021/22 by 66%, from 133,715 to 44,708 (2021/22) – perhaps indicating that Canadians are less dissatisfied about unsolicited telecommunications, are less aware that they may complain to the CRTC and/or that they do not believe that complaining to the CRTC is efficacious.

As for actual infractions, the CRTC’s reports essentially provide one-year snapshots, with very little historical information. The reports’ information does not fully coincide with their down escriptions of the CRTC’s enforcement actions: the CRTC ‘decisions’ mentioned in the reports are not clearly defined, and the information about repeat violators of the CRTC’s *Rules* is provided through anecdotes rather than numbers.

Type of Action	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22
Warning letters			50	16	5	713	29	430	4	19	5
Citations	89		8	7	8	37		49	14	22	5
Notices of violations		15		32	20	8					
Decisions							1	3	2		

Moreover, it is somewhat unclear how the CRTC tracks its warning letters internally. Its National Do Not Call List reports state that the Commission issued 458 warning letters from 2016/17 to 2020/21 – but when asked under the *Access to Information Act* about the numbers of warning letters it had issued in that period the CRTC said “a search of the records under the control of the Canadian Radio-television and Telecommunications Commission has revealed none related” to this subject: see Figure 1, next page.



Figure 1: A-2021-00045, 1 February 2022

This letter is further to your request of December 2, 2021, to obtain:

Clarification Text Received January 7, 2022:

"Please provide copies of documents that show, for each of the past five years (whether calendar or CRTC Apr-Mar fiscal year, but please state which period is being used) the number of warning letters sent regarding alleged violations [with respect to unsolicited telecommunications while identifying the Part or Parts of the Unsolicited Telecommunications Rules alleged or found to have been violated], and the names of the parties to whom such letters were sent (ie, the company or corporate name if available or individuals' names if not sent to a company or corporation)."

Original Text Received December 2, 2021:

Please provide copies of documents that show, for each of the past five years (whether calendar or CRTC Apr-Mar fiscal year, but please state which period is being used) - the number of warning letters sent regarding alleged violations, and - the names of the parties to whom such letters were sent (ie, the company or corporate name if available or individuals' names if not sent to a company or corporation). Thank you."

We regret to inform you that a search of the records under the control of the Canadian Radio-television and Telecommunications Commission has revealed none relating to the subject of your request under the Access to Information Act (ATIA).

Figure 2

The CRTC also publishes data on its website about its "[Enforcement actions](#)" which can be sorted by types of enforcement action and by year. The Forum cut and paste the information about the "695 entries" (see bottom of Figure 2) into a spreadsheet.

Comparing these data with the CRTC's annual National Do Not Call List reports shows inconsistencies.

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Canadian Radio-television and Telecommunications Commission

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Home → Compliance and Enforcement

Enforcement actions

To protect the interests of Canadians and prevent abuse of the communications system, we promote compliance with the Unsolicited Telecommunications Rules (UTR), Canada's Anti-Spam Legislation (CASL) and Voter Contact Registry (VCR).

Action types

Here's a list of measures we can take to reinforce compliance:

- ▶ Citation
- ▶ Notice of Violation
- ▶ Settlement
- ▶ Undertaking
- ▶ Compliance and Enforcement Decision

Use the filters below to refine your search:

Year: Select ▾ Action type: Select ▾ Enforcement regime: Select ▾

Refine search Reset

Search key word, person or business by filtering items:

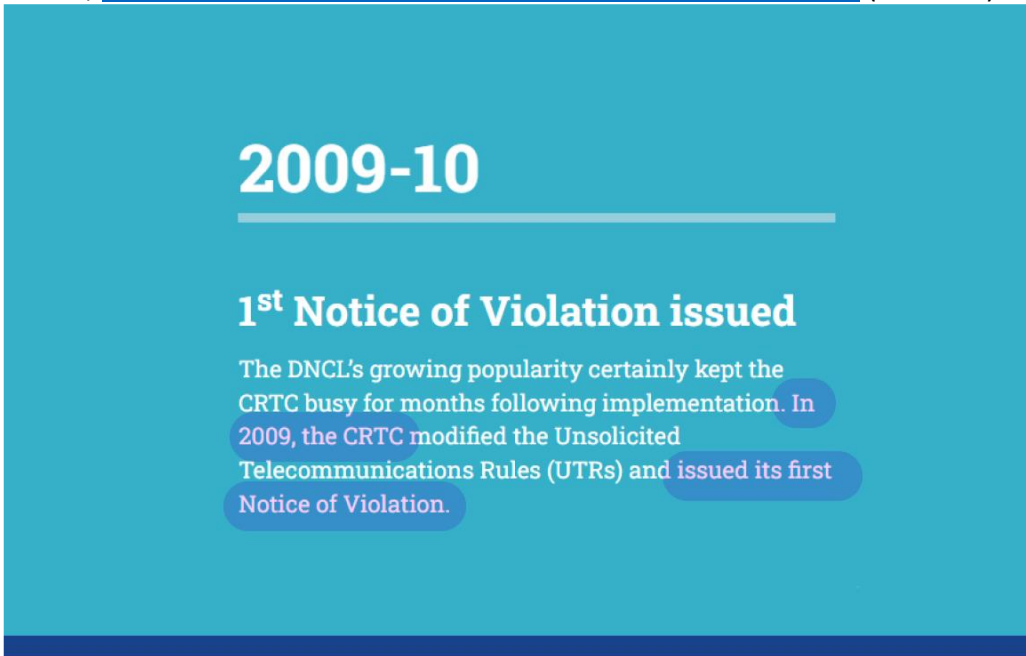
Filter items: Showing 1 to 10 of 695 entries | Show 10 ▾ entries

Date ↑↓	Action type ↑↓	Person or business	Details
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For example, the CRTC’s [The National Co Not Call List’s \(DNCL\) 10-Year Anniversary](#) (undated) report includes a graphic showing that the CRTC issued its first Notice of Violation in 2009-10:

CRTC, [The National Do Not Call List’s \(DNCL\) 10-Year Anniversary](#) (undated)



<https://crtc.gc.ca/eng/ce/actions.htm>

The first Notice of Violation appearing in the CRTC’s Enforcement Actions database is from 22 August 2011, however:

Use the filters below to refine your search:

Year

Select

Action type

Notice of violation

Enforcement regime

Select

Refine search

Reset

Search key word, person or business by filtering items:

Filter items

Showing 1 to 10 of 205 entries (filtered from 695 total entries) | Show 10 entries

Date	Action type	Person or business	Details
2010-12-16	<ul style="list-style-type: none">Notice of violationSettlement	Xentel DM Inc.	<ul style="list-style-type: none">\$500,000 AMP imposedViolations of Part II, sec. 4 & 7 (UTR) Enforcement action PDR 9174-773 and PDR 9174-825
2010-12-20	<ul style="list-style-type: none">Notice of violationSettlement	Bell Canada	<ul style="list-style-type: none">\$1,300,000 AMP imposedViolations of Part II, sec. 4, and Part III, sec. 15 (UTR) Enforcement action PDR 9174-890
2011-08-22	<ul style="list-style-type: none">Notice of violationSettlement	Goodlife Fitness Centres Inc.	<ul style="list-style-type: none">\$300,000 AMP issuedViolations of Part IV, sec. 2 (UTR) Enforcement action PDR 9174-977

<https://crtc.gc.ca/eng/ce/actions.htm>



Moreover, the 'actions' described in the CRTC's National Do Not Call List annual reports differ from those reported in its Enforcement Actions database because the database does not report on 'warning letters', and because in 165 instances appeared to show that penalties had been combined (a notice of violation and a decision, or a notice of violation and a settlement):

April 2011 – March 2012 to April 2021 – March 2022			
CRTC National Do Not Call List reports		CRTC Enforcement Actions database	
Category	Number	Category	Number
Warning letters*	1,271		
Citations	150	Citation	328
Decisions	6	Decision	88
Notices of violation		Notice of violation	26
		Notice of violation & Decision	3
AMPs imposed through negotiated settlement		Notice of violation & Settlement	162
		Settlement	5
[Absent]		Undertaking	12
Total	1,427		593

* The 2016/17 National Do Not Call List report states that the CRTC issued 713 warning letters in that year.

The CRTC's Enforcement Action database also showed that while (at least) 17 parties breached the CRTC's *Rules* more than once, no consistent pattern of enforcement action – such as increasing levels of 'severity' in action – is immediately evident.

	Date	CRTC year	Action 1 & 2	Repeat	Person or business	Total fine or penalty	Decision
1	2018-05-23	2018/19	Citation	1st	2341652 Ontario Limited		
	2018-05-31	2018/19	Citation	2nd	2341652 Ontario Limited		
2	2014-11-28	2014/15	Decision	1st	3510395 Canada Inc. (dba Compu.Finder)		Decision 9102-201400302-003
	2015-03-05	2014/15	Notice of violation & Decision	2nd	3510395 Canada Inc. (dba Compu.Finder)	\$1,100,000	Enforcement action 9094-2014-00302-001
	2017-10-19	2017/18	Decision	3rd	3510395 Canada Inc. (dba Compu.Finder)	\$200,000	Decision CRTC 2017-368; Enforcement action 9094-2014-00302-001
3	2012-03-30	2011/12	Decision	1st	9184-8630 Québec Inc. (dba Ramonage Plus)	\$4,000	Decision CRTC 2012-191
	2012-06-12	2012/13	Decision	2nd	9184-8630 Québec Inc. (dba Ramonage Plus)	\$4,000	Decision CRTC 2012-330
	2022-11-24	2022/23	Decision	3rd	9184-8630 Québec Inc., operating as Ramonage Plus	\$24,927.98	Decision CRTC 2022-320
4	2010-06-10	2010/11	Decision	1st	Action Windows and Doors Ltd.	\$3,000	Decision CRTC 2010-364
	2014-07-23	2014/15	Decision	2nd	Action Windows and Doors Ltd.	\$24,000	Decision CRTC 2014-384
5	2016-03-10	2015/16	Citation	1st	Adnan Rehman		
	2016-03-10	2015/16	Citation	2nd	Adnan Rehman		
6	2013-07-25	2013/14	Citation	1st	Blue Dream HT Ltd.		
	2015-12-22	2015/16	Decision	2nd	Blue Dream HT Ltd. (Blue Dream)	\$21,000	Decision CRTC 2015-572
	2019-09-09	2019/20	Decision	3rd	Blue Dream HT Ltd.	\$69,000	Decision CRTC 2019-317



	Date	CRTC year	Action 1 & 2	Repeat	Person or business	Total fine or penalty	Decision
7	2016-12-14	2016/17	Notice of violation	1st	Brian Conley, nCrowd, Inc.	\$100,000	Decision CRTC 2019-111; Enforcement action 9090-2015-00414
	2019-04-23	2019/20	Decision	2nd	Brian Conley	\$100,000	Decision CRTC 2019-111
8	2013-10-08	2013/14	Decision	1st	Canadian Choice Home Improvements Inc.	\$10,000	Decision CRTC 2013-542
	2015-10-26	2015/16	Notice of violation & Settlement	2nd	Canadian Choice Home Improvements Inc.	\$140,000	Enforcement action PDR 9174-1617
9	2010-08-05	2010/11	Citation	1st	CR Group Marketing Inc.		
	2012-02-29	2011/12	Citation	2nd	CR Group Marketing Inc.		
10	2010-08-04	2010/11	Citation	1st	Imperial Data Supply Corp.		
	2012-02-15	2011/12	Decision	2nd	Imperial Data Supply Corp.	\$18,000	Decision CRTC 2012-98
	2017-06-16	2017/18	Citation	3rd	Imperial Data Supply Corp.		
11	2020-11-09	2020/21	Citation	1st	iPro Realty Ltd., Brokerage		
	2021-01-21	2020/21	Citation	2nd	iPro Realty Ltd., Brokerage		
	2010-06-17	2010/11	Citation	1st	Les Aliments SRC Inc.		
	2012-03-23	2011/12	Decision	2nd	Les Aliments S.R.C. Inc.	\$24,000	Decision CRTC 2012-173
12	2012-03-06	2011/12	Citation	1st	Lev Olevson (dba Advantage Pro)		
	2012-03-30	2011/12	Decision	2nd	Mr. Lev Olevson (dba Capital Windows and Doors)	\$2,000	Decision CRTC 2012-195
	2014-02-28	2013/14	Decision	3rd	Lev Olevson	\$8,000	Decision CRTC 2014-89
	2014-08-12	2014/15	Decision	4th	Lev Olevson	\$8,000	Decision CRTC 2014-424
	2015-04-01	2015/16	Notice of violation & Settlement	5th	Lev Olevson	\$16,000	
13	2012-03-06	2011/12	Citation	1st	Loyal Seal Windows and Doors Inc.		
	2014-05-28	2014/15	Notice of violation & Settlement	2nd	Loyal Seal Windows and Doors Inc.	\$10,000	Enforcement action PDR 9174-1403/2
	2020-08-07	2020/21	Notice of violation & Settlement	3rd	Loyal Seal Windows & Doors Inc.	\$ 12,000	Enforcement Action PDR 9174-2828
14	2011-03-24	2010/11	Settlement	1st	Rogers Communications		
	2015-11-20	2015/16	Undertaking	2nd	Rogers Media Inc.	\$ 200,000	Enforcement action 9109-201400319-001
15	2021-03-29	2020/21	Notice of violation	1st	Scott William Brewer		Enforcement Action 9110-2018-00509/1
	2022-01-04	2021/22	Undertaking	2nd	Scott William Brewer	\$ 7,500	Enforcement Action 9110-2018-00509/2
16	2013-12-17	2013/14	Notice of violation & Settlement	1st	Solus VB Inc.	\$ 5,000	Enforcement action PDR 9174-1406
	2017-12-10	2017/18	Citation	2nd	Solus VB Inc.		
	2012-03-06	2011/12	Citation	1st	Sunnyside Window Cleaning Ltd.		
	2016-01-20	2015/16	Citation	2nd	Sunnyside Window Cleaning Ltd.		
17	2009-08-26	2009/10	Decision	1st	Waterproofing by Peerless Mason Inc.	\$10,000	Decision CRTC 2009-524
	2010-07-21	2010/11	Decision	2nd	Waterproofing by Peerless Mason Inc.	\$20,000	Decision CRTC 2010-493



In brief, gaps remain between the CRTC's descriptions of its enforcement activities in its National Do Not Call List annual reports and the data presented through its Enforcement Actions page. The incidence of repeat non-compliance may also be underestimated as the CRTC's reports appear to be focused on non-compliance repeated in two consecutive years – while the non-compliance summarized above shows that in 15 of the 17 cases the non-compliance spanned several years. Definitional incoherence, inconsistencies in application and the absence of a coherent approach to describing outcomes combine to raise concerns about arbitrariness. Not incidentally, they also make evidence-based policy evaluation both time-consuming and inexact.

Recommendations

To be truly accountable, the CRTC should revise its internal approach to collecting and presenting data about its operations to use the same terminology and definitions in its databases and its reports. Consistent definitions in reports and databases would strengthen the ability of the CRTC and other interested parties to evaluate its enforcement activity over time.

Maintaining the *status quo* – in which CRTC policy outcomes are difficult or at times even impossible to evaluate – has the potential to bring the CRTC's administration of its responsibilities into disrepute.

~ Forum for Research and Policy in Communications (FRPC)

Other comments in this series

- 1 March 2023: [Openness means not hiding applications from public view](#)
- 2 March 2023: [Openness means not just describing but explaining the CRTC's process and proceedings](#)
- 3 March 2023: [Openness means 'real' public hearings, published decisions and published meeting schedules](#)
- 4 March 2023: [Openness means publishing information about CRTC meetings with those it regulates](#)
- 5 March 2023: [Openness today means easier access to CRTC programming, ownership and financial data](#)
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- 9 March 2023: [Openness means timeliness](#)
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