

HOW TO PAY THE PIPER:

A PRIMER ON ADDITIONAL CHARGES TO CONSUMERS IN CANADA FOR PAPER BILLING



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How to Pay the Piper:
A Primer on Additional Charges to Consumers in Canada for Paper Billing

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Contents

Acknowledgement 3

Executive Summary..... 5

 Estimated Annual Costs to Canadian Consumers to Receive Paper Bills and Statements 6

Section 1 – Introduction..... 8

 1.1 Methodology 10

Section 2 – Why is “Pay-to-Pay” Occurring? 11

 How Much do These Paper Bill Fees Cost? 19

 Figure 2-5 Estimated Annual Cost to Receive Paper Bills for Canadian Consumers Without Internet Access or Not Using Computers 26

 Figure 2-10 Estimated Annual Cost to Receive Paper Bills for 1 in 10 or 3 in 10 Canadian Consumers with Internet Access, Canadians Without Internet Access and Canadians Not using Computers. 32

Section 3 Canadian Consumers Have Their Say 35

 Results 36

Section 4 – Stakeholder Input..... 44

Section 5 – Domestic Law 48

Section 6 – International Approaches to Paying for Paper Bills..... 59

Section 7 – Conclusions and Recommendations 67

 Recommendations 69

Appendix A - CRTC Response from Landline Providers and Wireless Providers Regarding Payment to Obtain a Paper Statement 70

Appendix B – PIAC and Environics Research Group, Pay for Paper Bills Study..... 73

Executive Summary

For decades, Canadian consumers were provided with a bill, usually on paper, when they agreed to purchase a good or service. Billing is the means by which a service provider reaffirms its service responsibilities to a customer and a customer clearly understands their financial obligations to the service provider. However, over the past few years a number of Canadian service providers have decided to impose fees for paper bills and statements, in an effort to promote the provision and acceptance of a bill or statement online. These service providers have used the introduction of an additional fee as an incentive for consumers to switch their preferred method of receiving a bill. For many consumers, the prospect of paying for a monthly bill or statement in paper format was not something they agreed to when first acquiring service.

The Government of Canada has indicated on two separate occasions they intend to take measures in an attempt to end this practice. In the most recent Speech from the Throne, delivered by Governor General David Johnston on October 16, 2013, he stated the government's intention to "End "pay to pay" policies, so customers won't pay extra to receive paper bills."¹ This was reaffirmed by the Minister of Finance in his remarks introducing Budget 2014 on February 11, 2014, when he committed the Government of Canada to "Prohibit the pay-to-pay practice that charges consumers for paper bills—including printed credit card statements."²

Many service providers cite the environmental benefits of providing online statements, although there is evidence these impacts are mitigated by consumers printing their online statements at home. Moreover, this report suggests paper bill fees disproportionately and negatively penalize lower income consumers, including seniors. In fact, for those consumers not using a computer, not having internet access or not being able to afford internet access, paying for a paper bill or statement costs those Canadians an estimated \$77 to \$102 million per year, plus applicable taxes. Assuming that 1 in 10 Canadians having internet access were added to this group by choosing to receive paper bills and statements, we estimate the total cost to all consumers receiving paper bills and statements is between \$215 and \$312 million annually. If 3 in 10 Canadians who have internet access pay for paper bills, the estimated total annual cost to Canadian consumers is between \$495 million and \$734 million, plus applicable taxes. All for a bill or statement that was largely provided as part of service in Canada prior to 2010.

¹ Johnston, D, Governor General of Canada, *Speech from the Throne to Open the Second Session of the Forty-First Parliament of Canada*, October 16, 2013, page 12. Last accessed April 7, 2014 at http://speech.gc.ca/sites/sft/files/SFT-EN_2013_c.pdf

² Finance Canada, *The Budget Speech*. Budget 2014 Website, February 11, 2014. Last accessed April 7, 2014 at <http://www.budget.gc.ca/2014/docs/speech-discours/2014-02-11-eng.html>

Estimated Annual Costs to Canadian Consumers to Receive Paper Bills and Statements

Services	For Canadians without Internet Access or Don't use Computers	If 1 in 10 Canadians with Internet Receive Paper Bills	If 3 in 10 Canadians with Internet Receive Paper Bills
Banking	\$28 Million	\$50 Million	\$152 Million
Communications	\$49 - 74 Million	\$88 – 160 Million	\$266 - 480 Million
Total*	\$77 - 102 Million	\$138 – 210 Million	\$418 – 632 Million
Federal Taxes	\$3.85 - 5.1 Million	\$6.9 – 10.5 Million	\$20.9 – 31.6 Million

*Plus applicable taxes

During this study we were able to collect the views of consumers through the analysis of a telephone survey. One-third of consumers indicated they were not comfortable with receiving bills or statements online, citing a variety of concerns. Moreover, 74% of Canadians surveyed disapproved of the practice of charging people extra for a paper bill or statement, while 71% approved of offering consumers a discount to those who opt for electronic billing. Finally, more than 8 of 10 respondents believe receiving a paper bill in the mail without having to pay an extra fee is part of the company's cost of doing business. As a result of this exercise, we contend that despite the growth of receiving bills and paying of bills online, consumers do not wish to be forced to transact personal financial matters in this way. Instead it seems that for consumers the ability to choose how they receive and pay bills remains an important feature of services.

Consumers have been voicing their concerns about being charged for a paper bill with provincial consumer affairs ministries, as well as the Commissioner for Complaints for Telecommunications Services (CCTS). While the CCTS indicates the number of official complaints they have received has increased, the exact number of concerned Canadians who have complained to provincial consumer affairs ministries is unknown, since a number of ministries do not register "inquiries" on matters relating to this practice.

From a legal perspective, the CRTC's Wireless Code omits mention of the practice of applying an extra fee to receive a paper bill or statement. A number of provinces have implemented a consumer protection regime regarding wireless service contract issues, however, no jurisdiction has banned the practice of paying for paper bill. The International Organization for Standardization (ISO) Network Services Billing standard allows the practice of charging fees for a paper bill as long as companies are transparent about the fee associated with providing them.

After reviewing the paper billing approach in other jurisdictions, we noted a number lack the regulatory or policy standards to limit the costs of bills to citizens. However, in Ireland, communication service providers distribute bills free of charge and must verify customers can access and use online bills before they are issued. In addition, the United Kingdom's telecom regulator has capped fees charged by communication providers for paper bills at £1.50 per month. Moreover, the regulator may apply a fairness test to determine whether the charges applied to consumers are appropriate.

As a result of this examination, and based on the collection of evidence obtained to produce this report, PIAC recommends the Government of Canada follows through on its commitment to eliminate the application of additional fees charged to Canadian consumers to receive a paper bill or statement. We also suggest service providers in Canada provide a modest discount to encourage customers to choose electronic billing, as well as recommend the amendment of consumer protection laws to eliminate the application of fees to receive paper bills and statements.

Section 1 – Introduction

Invented by the Chinese, then mass produced based on a process developed by the French in the late Eighteenth Century, paper has been used to keep records for well over a thousand years.³ The use of paper as a method to bill customers has seemingly been ubiquitous in Canada for over 100 years. While consumers may occasionally growl at the sight of them, receiving a paper bill for a good or a service has been an accepted staple of the consumer experience in Canada.

The notion of how that physical bill was paid for was rarely considered. If any thought was given to the question whatsoever, it is believed consumers had paid for the provision of a paper bill when they agreed to purchase the good or service – it was simply part of the price. However, in recent years, a number of telephone, internet, television and other service providers have begun to charge consumers an additional fee to continue receiving a monthly statement for these services by mail. These companies make the argument that customers can now receive their monthly statements online, and therefore they feel they have the right to charge those consumers who do not wish to receive their statements over the internet or through an electronic message (“e-billing”). Although, in order for a contractual obligation to be complete, one could argue it is essential that a consumer of a service receive a bill, regardless of the method in which that bill gets delivered. Critics of this growing phenomenon refer to this practice of applying fees to distribute paper bills as “pay-to-pay fees.”

Under the “pay-to-pay” model, service providers who have previously provided paper bills now force their customers to pay for this function twice. What was a traditional business cost incurred by the service provider is increasingly an additional financial burden to the Canadian consumer. Critics of applying fees for printed billing statements claim this practice unfairly targets seniors, those who do not have regular access to the internet, such as new Canadians or those in the lowest income quartile, as well as those who do not feel comfortable performing such transactions online. In addition, some consumers are hesitant to receive their bill notices electronically due to the risk of falling victim to online phishing, and as a result, having their personal information used for identity theft.

PIAC contends that billing is an essential part of the contractual relationship between a service provider and consumers. It is the means by which a service provider reaffirms its service responsibilities to a customer and a customer clearly understands their financial obligations to

³ Thompson, Susan, “Paper Manufacturing and Early Books,” *Annals of the New York Academy of Sciences*, 2006, Vol. 314, Issue 1, p. 167, and Richard J. Herring, George Croly (1863), *Paper & Paper Making Ancient and Modern*. Michigan: Longman, Green, Longman, Roberts, & Green, p.53. Last accessed December 10, 2013, at <https://archive.org/stream/paperpapermakin00crolgoog#page/n78/mode/2up>

the service provider. Therefore, the ability of a customer to access, understand, and act upon their billing statement is critical.

This study is distinct since it involves a practice already identified as concerning by Canadian policy makers. The Government of Canada indicated in both the 2013 Speech from the Throne, as well as Budget 2014, its intention to “end “pay to pay” policies, so customers won’t pay extra to receive paper bills.”⁴ In addition, the Public Interest Advocacy Centre (PIAC) and the Consumers’ Association of Canada (CAC) filed an application in October 2013 to the Canadian Radio-television and Telecommunications Commission (CRTC) to request the elimination of all fees charged by telecommunications service providers for providing bills in paper format. PIAC and CAC are seeking refunds for “paper bill fees” charged to standalone Primary Exchange Service customers and landline customers in regulated areas.⁵ This application asks the CRTC to prohibit telecommunications companies from charging paper bill fees as these are penalizing customers simply to pay for the cost of billing those same customers. The groups argue paper bill fees are an unauthorized rate increase for regulated landline customers and unjustly discriminatory towards all telecommunications customers.⁶

As a result, this study will examine the conduct of service providers in Canada who have begun to charge consumers for a paper bill and the impact of these practices on consumers. It will also analyze the arguments put forward by both the service providers instituting the practice of paying for paper billing, as well as their critics.

⁴ Johnston, D, Governor General of Canada, *Speech from the Throne to Open the Second Session of the Forty-First Parliament of Canada*, October 16, 2013, page 12. Last accessed April 7, 2014 at http://speech.gc.ca/sites/sft/files/SFT-EN_2013_c.pdf. See also Finance Canada, *The Budget Speech*. Budget 2014 Website, February 11, 2014. Last accessed April 7, 2014 at <http://www.budget.gc.ca/2014/docs/speech-discours/2014-02-11-eng.html>

⁵ Public Interest Advocacy Centre, *Application Asks CRTC to Prohibit Paper Bill Fees and Seek Refunds for Regulated Phone Customers*, Media Release, October 23, 2013. Last accessed April 14, 2014 at http://www.piac.ca/telecom/application_asks_crtc_to_prohibit_paper_bill_fees_and_seek_refunds_for_regulated_phone_customers/

⁶ Public Interest Advocacy Centre, *Application Asks CRTC to Prohibit Paper Bill Fees and Seek Refunds for Regulated Phone Customers*, Media Release, October 23, 2013. Last accessed April 14, 2014 at http://www.piac.ca/telecom/application_asks_crtc_to_prohibit_paper_bill_fees_and_seek_refunds_for_regulated_phone_customers/

1.1 Methodology

During this examination of the conduct of service providers in Canada who have begun to charge consumers for a paper bill, PIAC compared the billing practice of charging for a paper bill by Canadian corporations to the relevant International Organization for Standardization (ISO) billing standard. Moreover, the study collected information from relevant stakeholders, including provincial consumer ministries, the Commissioner for Complaints for Telecommunications Services (CCTS), the Ombudsman for Banking Services and Investments (OBSI), and other consumer groups. It also obtained evidence from international consumer groups and agencies to compare the experiences of consumers in other jurisdictions regarding the practice of service providers beginning to charge consumers to receive a monthly statement for their services by mail.

This study also includes a telephone survey commissioned by PIAC, conducted in August and September 2013, to obtain the views of Canadians on the move toward paperless billing on behalf of service providers in Canada. Specifically, PIAC assessed the percentage of Canadian consumers who feel negatively affected by this billing practice as it becomes more prevalent in Canada. In addition, the survey determined and identified if any demographic groups of consumers feel more adversely affected by this billing practice, based on age, gender, income level, and location. The survey was designed to yield evidence to indicate whether consumers approve of this billing practice as an alternative to receiving a monthly statement by mail. Analysis also determined what percentage of consumers surveyed are comfortable paying for their services online on a monthly basis, what percentage are uncomfortable using this method of payment, and what percentage feel they are unable to use this method due to a lack of access to the internet. This study reviewed relevant Canadian legislation and jurisprudence related to the practice of charging for paper billing to understand issues of service contracts and billing practices from a consumer perspective.

Section 2 – Why is “Pay-to-Pay” Occurring?

The concept of receiving a bill online for service has been offered to some Canadian consumers for well over a decade. TELUS, for instance, has been offering online billing to its customers since 2001.⁷ The Royal Bank of Canada (RBC) has been offering this service to consumers since 2006, while Bell Canada has been offering online statements for subscribers of their internet and phone services since 2010. Rogers Communications began issuing statements online in 2011.

Since 2010, however, a number of service providers and banks⁸ have required customers who wish to continue receiving printed billing to incur a supplementary charge for such billing. Customers who do not wish to pay this extra fee can simply agree to receive their statements online. Unfortunately, this forces a significant segment of Canadians to pay the extra fee simply because they do not have access to the internet or have a computer in their home. This section will attempt to display the effect of these extra charges on that segment of Canadian consumers.

The additional fees for a monthly bill or statement on paper are imposed on top of monthly service prices these service providers charge for the underlying services consumers purchase. Such supplementary charges are typically billed to customers as an additional line item on their monthly statement. As noted in the introduction, a printed invoice was a function many Canadian businesses had been providing as part of their service for decades. However, for many Canadian consumers the notion of receiving a paper bill as part of the package for services rendered is no longer a reality. This section examines why this transition is occurring and the justifications provided by those businesses that have chosen to charge their customers an additional fee to continue receiving a paper bill.

It is difficult to objectively pose the question “why are service providers issuing this additional charge to consumers,” and not immediately suspect it is simply a selfish tactic employed to increase profits. Fortunately, PIAC has not been the only organization interested in aspects related to paper-billing practices. The Canadian Radio-television and Telecommunications Commission (CRTC) began requesting billing practice information from service providers under its purview in April 2012. This was the result of an unspecified number of complaints relating to notifications received by Bell Canada customers concerning the delivery of consumer bills. In these notifications, Bell Canada stated that it was moving to e-bill as its standard method of delivering invoices to Bell Canada’s Internet customers and that, starting in June 2012,

⁷ Johannsson, Jim, “Wireless carriers charge \$2 to \$4 for paper bills,” *Blog Post*, July 28, 2010. Last accessed December 16, 2013 at <http://blog.ellenroseman.com/?p=965>

⁸ The application of a fee for a paper statement by other financial institutions, such as credit unions, was investigated as part of this study. It was found, as a general rule, that credit unions operating in Canada did not apply such fees.

customers will be charged a \$2 monthly fee if they continue to receive paper bills.⁹ Figure 2-1 is a copy of a notification Bell Canada provided to the CRTC on May 3, 2012.

Figure 2-1 Bell Canada Billing Notice to Customers, 2012¹⁰



Trouble viewing this email? [View in browser.](#)

Update about your paper bill.

As part of our ongoing effort to be environmentally friendly and to improve the level of billing information you have access to, we are pleased to let you know that as of June 2012, Bell is moving to e-bill as our standard method of delivering invoices to our Bell Internet clients. And while you are currently receiving both e-bill and paper bills, we would like to invite you to choose e-bill only.

Remember, with e-bill, you can continue to enjoy benefits like:

- Reducing paper bill clutter – and your environmental footprint
- Accessing your bills and account information online anytime, 24/7
- Viewing your current bills as soon as they are ready – we'll even notify you every month
- Receiving more billing detail as systems are upgraded

If you prefer, we are pleased to provide you the option of continuing to receive a paper bill. However, please note that starting with your June invoice, you will be charged a \$2 monthly fee for paper bills.

To make the switch to e-bill, simply log in to MyBell and ensure that only the box that says "I want to receive an e-bill" is selected. If we don't hear from you by June 1, 2012, we will continue to deliver your paper bill and the \$2 fee will apply.

[Log in](#)

⁹ *Canadian Radio-television and Telecommunications Commission*, Letter to Bell Canada, April 23, 2012. Last accessed January 15, 2014, at <http://www.crtc.gc.ca/eng/archive/2012/lt120423.htm>

¹⁰ *Canadian Radio-television and Telecommunications Commission*, Documentation from Bell Canada, May 3, 2012. Last accessed January 15, 2014, at http://www.crtc.gc.ca/public/otf/2012/8480/b54_x/1811117.zip

As a result of exchanges of information with Bell Canada, as well as additional expressions of concern from Canadians, the CRTC decided a larger investigation was required. In an effort to obtain a better understanding of the extent of this practice across the Canadian communications sector, on July 3, 2013, the CRTC issued a letter to 61 organizations, consisting of:

- Incumbent local exchange carriers (ILECs)
- Small incumbent local exchange carrier (SILECs)
- Voice over Internet Protocol providers (VOIPs)
- Cable companies
- Wireless providers

In this letter, the CRTC posed the following series of questions:¹¹

1. Is your company, including affiliates, charging Canadian customers of telecommunications and/or broadcasting services a fee for a paper bill or providing a discount as an incentive to switch to electronic billing? If so, specify the fee or discount being applied.
2. If your company, including affiliates, is charging Canadian customers for a paper bill or providing a discount as an incentive to switch to electronic billing, describe in which circumstances it is doing so. In particular, please provide details specifying:
 - (a) the broadcasting and telecommunications service(s) in respect of which the fee/discount applies;
 - (b) whether the service is provided in accordance with a tariff or a license approved by the Commission;
 - (c) whether the fee/discount applies to all customers for each service identified, and if not, the categories of customers to which the fee/discount applies and the categories of customers that are exempt from any such fee or do not receive the discount (e.g. new vs. existing customers, people with disabilities, seniors);
 - (d) whether there are options for customers to avoid being charged for a paper bill (other than opting for electronic billing); and
 - (e) any other relevant terms and/or conditions applicable to the fee/discount.

As a result of this fact-finding exercise, it is possible to review the justifications provided by those respondents to this CRTC request for further information related to paper billing practices. PIAC has reviewed the responses provided and summarized the responses from landline and wireless service providers in Appendix A. The evidence in Appendix A suggests most providers charge

¹¹ *Canadian Radio-television and Telecommunications Commission*, Letter Requesting Information, July 3, 2013. Last accessed January 15, 2014, at <http://www.crtc.gc.ca/eng/archive/2013/lt130703.htm>

their customers for paper bills whether providing wireless or wireline services, although the fee is much more common among the wireless companies. Justifications for the application of this fee were usually based on environmental concerns or, in the case of Bell Canada, based on an application of behavioral economics. An examination of these justifications provides additional evidence to suggest the incentives for service providers to apply these fees.

Environmental Concerns

According to the Figure 2-1, Bell Canada decided to apply these additional fees as part of an effort to be environmentally-friendly. In a letter to the CRTC, dated December 21, 2012, Bell claimed that their electronic billing initiative has already saved an estimated 33,000 trees.¹² Throughout the course of this investigation, this was a recurring justification cited by service providers to increase costs to consumers. WIND Mobile, for example, notes that its customer base is environmentally aware and they therefore prefer not to have paper bills.¹³ In a response to a request from PIAC for further information on this topic, Rogers Communications noted they saved more than 992,000 kilograms of paper by issuing online versus paper bills in 2012.¹⁴ Rogers also revealed a reduction of internal office paper consumption by 19% in 2011, while increasing the amount of waste they recycle.¹⁵ Eastlink noted that fees for paper bills are a method to reduce the amount of paper the company produces and has a positive impact on the environment.¹⁶ Even companies that currently do not charge a fee to receive a paper bill, such as SaskTel, include a note about the importance of being able to charge for paper bills as an environmentally sound practice.¹⁷

When Ellen Roseman of the *Toronto Star* wrote about Bell Canada's move towards charging for paper billing in March 2012, some of her readers noted that soon they will printing their bills at home. Readers concluded that, as a result, no trees or electricity will be saved in this

¹² Bell Canada, *Information Requested by the Canadian Radio-television and Telecommunications Commission*, Response, December 21, 2012. Last accessed January 16, 2014, at

http://www.crtc.gc.ca/public/otf/2012/8480/b54_x/1812657.doc

¹³ Globalive Wireless Management Corp., *Information Requested by the Canadian Radio-television and Telecommunications Commission*, Response to Interrogatory, July 18, 2013. Last accessed January 16, 2014, at

http://www.crtc.gc.ca/public/otf/2012/8480/b54_x/1944515.zip

¹⁴ Rogers Communications, *Charging customers for paper bills*; CRTC Reference: 8480-B54-X, Response to Interrogatory, July 3, 2013. Last accessed January 16, 2014, at

http://www.crtc.gc.ca/public/otf/2012/8480/b54_x/1944092.zip

¹⁵ Rogers Communications, *Charging customers for paper bills*; CRTC Reference: 8480-B54-X, Response to Interrogatory, July 3, 2013. Last accessed January 16, 2014, at

http://www.crtc.gc.ca/public/otf/2012/8480/b54_x/1944092.zip

¹⁶ Bragg Communications Inc., *Charging customers for paper bills*; CRTC Reference: 8480-B54-X, Response to Interrogatory, July 18, 2013. Last accessed January 16, 2014, at

http://www.crtc.gc.ca/public/otf/2012/8480/b54_x/1944526.pdf

¹⁷ Saskatchewan Telecommunications, *Charging customers for paper bills*, Response to Interrogatory, July 17, 2013. Last accessed January 16, 2014, at http://www.crtc.gc.ca/public/otf/2012/8480/b54_x/1944257.doc

conversion.¹⁸ Given the choice between the industry's view that they are saving thousands of tons of paper, and the consumer view that many will simply print off the online bill, we suspect the truth to be somewhere in the middle. What is of concern and worthy of further study is whether there are Canadian consumers who are putting themselves at risk financially by opting for online billing, just to save the monthly fee for a paper bill.

There is evidence from the United Kingdom suggesting this scenario is a possibility. In August 2013, the Daily Mail reported Britons who prefer to pay their bills by traditional paper methods are typically paying £276 a year more than householders who do it online.¹⁹ The annual total is split among fees for mobile phone contracts, broadband internet service and utility bills. However, the consumer group Which? found that half the population would prefer to have their bills in the traditional manner.²⁰ This is a significant issue in a country where 8 million residents have never used the internet, including 5 million seniors.²¹

As part of PIAC's investigation, a survey of 2,005 Canadians was commissioned and the full results can be found in Appendix B. It was conducted between August 27 and September 1, 2013. The goal was to obtain views on a variety of questions surrounding the practice of paying a fee to receive a paper bill. When PIAC asked those individuals who received and paid household bills regularly, 33% of respondents were uncomfortable receiving a bill electronically.²²

The main reasons cited among those uncomfortable receiving a bill electronically included a simple expression of preference for a paper bill (16%). Meanwhile, 15% noted having no internet access or did not use computers at all, 12% did not feeling comfortable enough using computers, and 4% find it easier to read paper bills.²³ Similarly, 33% respondents still paid their bills mostly by mail or in-person, and 27% were not very comfortable or not at all comfortable with paying their bills online or electronically.²⁴ Where respondents were faced with a paper bill fee, 54%

¹⁸ Roseman, Ellen, "Bell gets flak for bullying clients into going paperless," *Toronto Star*, March 31, 2013. Last accessed January 16, 2014, at http://www.thestar.com/business/2012/04/06/roseman_bell_gets_flak_for_bullying_clients_into_going_paperless.html

¹⁹ Poulter, Sean, "The £276 cost of not paying bills online: How 5 million pensioners are being punished." *Daily Mail*, August 24, 2013. Last access February 13, 2014 at <http://www.dailymail.co.uk/news/article-2401244/The-276-cost-paying-bills-online-How-5million-pensioners-punished.html#ixzz2tEx3Y84W>

²⁰ Poulter, Sean, "The £276 cost of not paying bills online: How 5 million pensioners are being punished." *Daily Mail*, August 24, 2013. Last access February 13, 2014 at <http://www.dailymail.co.uk/news/article-2401244/The-276-cost-paying-bills-online-How-5million-pensioners-punished.html#ixzz2tEx3Y84W>

²¹ Poulter, Sean, "The £276 cost of not paying bills online: How 5 million pensioners are being punished." *Daily Mail*, August 24, 2013. Last access February 13, 2014 at <http://www.dailymail.co.uk/news/article-2401244/The-276-cost-paying-bills-online-How-5million-pensioners-punished.html#ixzz2tEx3Y84W>

²² PIAC and Environics Research Group, *Pay for Paper Bills Study*, September 2013.

²³ PIAC and Environics Research Group, *Pay for Paper Bills Study*, September 2013.

²⁴ PIAC and Environics Research Group, *Pay for Paper Bills Study*, September 2013.

have paid the fee to receive a paper statement.²⁵ Therefore, it is possible there are Canadians who receive bills online, just to save from paying the monthly fee, but are not comfortable undertaking this task.

Accessing Your Bill Anytime & View Bills as Soon as they are Ready

Bell Canada's notice to customers also highlighted the ability of e-billing subscribers to access their bills and account information online anytime. While it is difficult to deny the convenience of online access to your account information, it is also important to note that 15% of consumers surveyed who were uncomfortable receiving a bill electronically are denied this opportunity due to lack of a computer or internet access.

The notice received by Bell Canada customers also emphasized allowing e-bill subscribers the benefit of "viewing your current bill as soon as it is ready." One could contend this was a peculiar aspect of e-billing to highlight, since regardless of the method of bill delivery, the service provider is equally compelled to notify subscribers as soon as their monthly bill is prepared. The statement on the notice by Bell Canada exclaiming, "we'll even notify you every month," is almost humorous when you consider when a customer receives a paper bill, that's the notice their current bill is ready. However, Bell Canada may have included this benefit in the notice in anticipation of a future delay in the delivery of paper statements. Alternatively, Bell Canada may have conducted internal studies concluding e-bill subscribers are more likely to pay their bills and pay them in a more timely fashion than subscribers receiving a paper bill.

Receiving More Billing Details as Systems are Upgraded

Bell Canada customers were also advised they would have access to additional details if they subscribe to e-billing as a result of future upgrades to the e-billing systems. At the present time, Bell Canada subscribers have access to an e-bill summary, as well as a detailed bill in .pdf format.²⁶

According to Bell Canada representatives, enhancements to their e-billing include the ability for customers to change their Internet rate plan, purchase extra internet usage, change their mobility rate plan, add mobility features, order a new wireless device or choose their TV programming.²⁷ Bell Canada customers benefit from access to their billing history for the past 12 months, and

²⁵ PIAC and Environics Research Group, *Pay for Paper Bills Study*, September 2013.

²⁶ Bell Canada, *What is e-Bill and How do I Register for It?*, website. Last accessed July 14, 2014 at http://support.bell.ca/billing-and-accounts/billing/what_is_e_bill_and_how_do_i_register_for_it?step=3

²⁷ Bell Canada, *Electronic Correspondence*, August 22, 2014.

may customize the view of their detailed bill elements, depending on the amount of information they wish to review.²⁸

Banks – Bills or (Mis)Statements?

As the evidence in Appendix A indicate, most providers charge their customers for paper bills whether providing wireless or wireline services. The fee is much more common, as WIND suggests almost standard, among the wireless companies. When it comes to the Canadian banking industry, however, there appears to be some confusion whether a fee is applied for receiving a paper bill.

When asked for their viewpoint regarding the practice of charging customers for a paper bill, the Canadian Bankers Association provided the following response:

“All major banks mail credit card bills and other loan statements where payment is owing to customers free of charge, so the questions you have provided are not relevant to the banking industry.

As you know, in the October Speech from the Throne the federal government made a commitment “to end ‘pay to pay’ policies, so customers won’t pay extra to receive paper bills.”

All major banks have practices that are consistent with this commitment on the distribution of paper bills.”²⁹

While the comments above may be true for “bills” requiring payment by consumers, it does not appear to be the case for the distribution of monthly account statements by Canadian banks. A series of media reports, as well as the Canadian Association of Retired Persons (CARP), have outlined the practice of applying a fee for receiving a monthly statement in paper through the mail.³⁰ For instance, Rob Engen, a personal finance columnist for the *Toronto Star*, noted in

²⁸ Bell Canada, *Electronic Correspondence*, August 22, 2014.

²⁹ Canadian Bankers Association, *Correspondence in Response to Stakeholder Questionnaire*, January 28, 2014.

³⁰ Engen, Rob, “Four bank service charges we love to hate,” *Toronto Star*, October 27, 2013. Last accessed February 28, 2014, at http://www.thestar.com/business/personal_finance/2013/10/27/four_bank_service_charges_we_love_to_hate.html. See also Althia Raj, “Charging For Paper Bills: There Oughta Be A Law, Opposition Says,” *Huffington Post*, October 1, 2013. Last accessed February 28, 2014 at http://www.huffingtonpost.ca/2013/10/01/charging-paper-bills_n_4024882.html, Ellen Roseman, “\$2 paper phone bill fee in CRTC crosshairs: Roseman,” *Toronto Star*, October 27, 2013. Last accessed February 28, 2014 at http://www.thestar.com/business/personal_finance/2013/10/27/2_paper_phone_bill_fee_in_crtc_crosshairs_roseman.html, and the Canadian Association for Retired Persons, *Letter from Sona Mehta, TD Vice President of Everyday Banking*, December 14, 2012. Last accessed February 28, 2014, at <http://www.carp.ca/wp-content/uploads/2013/01/TD-letter-to-CARP-on-Paper-Bills.pdf>.

October 2013 that “TD, BMO, Scotiabank and CIBC charge customers up to \$2 per month to receive statements by mail.”³¹ In addition, the CRTC’s report on their fact-finding exercise on fees for paper bills stated all five largest Canadian banks apply a \$2 to \$3 per month fee to receive statements by mail.³² Moreover, in April 2012, the *Hamilton Spectator* reported on this practice using a statement from a TD spokesperson:

“Most of our customers see the benefit,” says TD spokeswoman Barbara Timmins, “About four in five new accounts choose paperless over receiving a printed monthly statement.”³³

As a result, it appears the Canadian Bankers Association is attempting to draw a fine line between bills, which they argue are delivered in a paper format with no charge, and monthly account statements, where a fee applies to receive a paper version. PIAC would contend this distinction is lost on a majority of Canadian consumers. For those consumers who are either unable or uncomfortable viewing their banking statements online, there should be options available to them other than being subject to a monthly fee to receive their account balances.

For Canadian seniors, there does appear to be some room to negotiate. For instance, CIBC will still send free statements to clients age 60 plus who have no-cost seniors’ accounts, while BMO will do the same for those who already have a senior account.³⁴ In addition, resources such as the Financial Consumer Agency of Canada’s Account Selector Tool can point out a number of options available to seniors who face a fee for a paper bill.³⁵ Moreover, a number of banks, as well as Rogers Communications, have mentioned their sensitivity to special circumstances and are willing to make exceptions in hardship situations.³⁶ However, these determinations are not universal. Rather, they are determined by the institution on a case-by-case basis, similar to what

³¹ Engen, Rob, “Four bank service charges we love to hate,” *Toronto Star*, October 27, 2013. Last accessed February 28, 2014, at

http://www.thestar.com/business/personal_finance/2013/10/27/four_bank_service_charges_we_love_to_hate.html.

³² CRTC, *Results on the fact-finding exercise on fees for paper bills*, (July, 2014), p.6. Last accessed July 23, 2014 at <http://www.crtc.gc.ca/eng/publications/reports/rp140723.htm>

³³ “Bell making Internet clients pay \$2 a month to get bills by mail,” *Hamilton Spectator*, April 4, 2012. Last accessed February 28, 2014 at <http://www.thespec.com/news-story/2238445-bell-making-internet-clients-pay-2-a-month-to-get-bills-by-mail/>

³⁴ Roseman, Ellen, “BMO says go electronic or pay \$2 a month for paper statements.” *Toronto Star*, February 8, 2013. Last accessed March 3, 2014 at <http://www.carp.ca/2013/02/08/bmo-says-go-electronic-or-pay-2-a-month-for-paper-statements/#sthash.td2FSjTa.dpuf>

³⁵ Financial Consumer Agency of Canada, *Account Selector Tool*. Last accessed May 30, 2014 at <http://www.fcac-acfc.gc.ca/Eng/resources/toolsCalculators/Pages/BankingT-OutilsIn.aspx>

³⁶ Roseman, Ellen, “BMO says go electronic or pay \$2 a month for paper statements.” *Toronto Star*, February 8, 2013. Last accessed March 3, 2014 at <http://www.carp.ca/2013/02/08/bmo-says-go-electronic-or-pay-2-a-month-for-paper-statements/#sthash.td2FSjTa.dpuf>, and Althia Raj, “Charging For Paper Bills: There Oughta Be A Law, Opposition Says,” *Huffington Post*, October 1, 2013. Last accessed February 28, 2014 at http://www.huffingtonpost.ca/2013/10/01/charging-paper-bills_n_4024882.html

was found in the responses by wireless and wireline providers in Appendix A. While appreciative of the option to negotiate the waiving of a fee for a paper statement, CARP noted many seniors just aren't aware that some companies are willing to temporarily waive fees.³⁷ As a result, PIAC suggests making this offer to negotiate with those uncomfortable receiving and viewing their statements online more prominent in their marketing efforts going forward.

In a further effort to address concerns regarding paper billing fees, on May 27, 2014, it was announced a number of Canadian banks have entered into a voluntary commitment with the Government of Canada to expand their low cost and no cost accounts. Banks previously offered low fee accounts for \$4 per month, no-fee accounts to seniors, youth and students, and waive monthly service fees to those who keep a minimum monthly balance. Starting January 15, 2015 these \$4 low fee accounts will include printed, mailed statements at no cost. These accounts will be available for free to youth, students, seniors qualifying for the Guaranteed Income Supplement and Registered Disability Savings Plan (RDSP) beneficiaries.³⁸ In addition, the Canadian Bankers Association have indicated some banks will allow customers to consolidate all of their account statements into one paper statement that would be mailed to them.³⁹ In that case, they would just pay one fee for all their accounts.

How Much do These Paper Bill Fees Cost?

However, the question remains, how much do paper statement surcharges from banks cost those Canadians who are unable to switch to online billing? This question is not possible to answer definitively, although an attempt will be made to provide a suggestion of this cost to consumers who do not have access to a computer or the internet. In 2006, the FCAC found that 96% of Canadians aged 18 and over have a savings, chequing or other account with a financial institution.⁴⁰ Statistics Canada estimates there were 27.3 Million Canadians over the age of 20 in 2013.⁴¹ Therefore, as an initial reference point, we contend there were an estimated 26,208,000 Canadians with bank accounts in 2013.

³⁷ Canadian Association of Retired Persons, *Paper Bill Surcharges Advocacy Update*. News Release, November 16, 2012. Last accessed March 4, 2014 at <http://www.carp.ca/2012/11/16/paper-bill-surcharges-advocacy-update/>

³⁸ Finance Canada, "Harper Government Secures Commitment from Largest Banks to Offer No-Cost Accounts for Financial Vulnerable Canadians," May 27, 2014. Last accessed July 23, 2014, at <http://www.fin.gc.ca/n14/14-073-eng.asp>

³⁹ Canadian Bankers Association, *Correspondence in Response to Stakeholder Questionnaire*, July 22, 2014.

⁴⁰ Financial Consumer Agency of Canada, *General Survey on Consumers' Financial Awareness, Attitudes and Behaviour*, 2006, p. 6. Last accessed March 4, 2014, at http://www.fcac-acfc.gc.ca/Eng/resources/researchSurveys/Documents/FCAC_GenSurvExec_2006-eng.pdf

⁴¹ Statistics Canada, *Population by Sex and Age Group*. Summary Table. Last accessed March 4, 2014, at <http://www.statcan.gc.ca/tables-tableaux/sum-som/l01/cst01/demo10a-eng.htm>. Recent population figure for Canadians aged 18 years and over was not found.

As noted in the CRTC’s report on their fact-finding exercise on fees for paper bills, the five largest Canadian banks apply a \$2 to \$3 per month fee to receive statements by mail.⁴² Together, these five banks account for approximately 85% of total bank assets in Canada.⁴³ For the sake of simplicity, we will estimate that each consumer of these banks has just one account with a paper bill fee of \$2 per month. Under these conditions, we can calculate approximately how many accounts are potentially subject to the monthly statement fee.

Figure 2-2 How Many Canadian Bank Accounts are Potentially Subject to a Paper Bill Fee

Number of Canadians aged 20 over	26,208,000
Market share of the 4 largest banks	85%
Assuming 1 bank account for each consumer	X 1
Number of bank accounts potentially subject to the \$2 fee	22,276,800

Recall earlier PIAC commissioned a consumer survey in August 2013 revealing 33% of respondents are not comfortable receiving bills electronically.⁴⁴ Of these respondents, 15% stated they have no internet access or did not use computers at all, while another 1% responded they could not afford internet access. This results in 5.28% of all respondents being forced to pay extra fees to receiving paper bills and statements.⁴⁵ If this 5.28% figure is applied to the number of banks accounts potentially subject to a \$2 paper statement fee stated above, this will be an estimate of how much this charge costs those consumers on a monthly and annual basis.

⁴² CRTC, *Results on the fact-finding exercise on fees for paper bills*, (July, 2014), p.6. Last accessed July 23, 2014 at <http://www.crtc.gc.ca/eng/publications/reports/rp140723.htm>

⁴³ Eggert, Claudio, “A Strategy Analysis of The “Big Five” Canadian Banks.” April 4, 2012, p. 4. Last accessed March 4, 2014, at <http://dtp.r.lib.athabascau.ca/action/download.php?filename=mba-12/open/eggertclaudioProject.pdf>

⁴⁴ PIAC, *Paying For Paper Bills Survey*, Conducted by Environics Research Group, October 2013.

⁴⁵ This figure is the result of the following calculation: $33\% \times (15\% + 1\%) = 5.28\%$

Figure 2-3 Estimated Annual Cost of a Paper Bill Fee for Bank Statements for Canadians without Access to Internet or do not use Computers

Number of banks accounts potentially subject to the \$2 fee	22,276,800
Canadian without internet access/ Don't use computers	X 5.28%
Number of bank accounts with no choice but to pay monthly statement fee	1,176,215
Application of \$2 fee	X 2
Estimated Monthly cost to Canadian consumers without internet access/ Don't use computers	\$2,352,430
12 month per year	X 12
Estimated Annual Cost	\$28,229,160

Based on available figures, it can be estimated that the introduction of the \$2 fee for the provision of paper statements by four of Canada’s largest banks costs Canadians without internet access or do not use computers over \$28 million annually. This is under the conservative assumption that each of these individuals uses a single bank account.

Behavioral Economics

In challenging the application of a fee to continue receiving a paper bill, a number of observers have suggested the use of an incentive to make the switch to online billing. In general, Appendix A indicates that companies with a smaller customer base, which are often regional in nature, do not impose a fee or instead offer rebates for switching to e-billing. These companies, because of their smaller size, or because of their use of legacy technology, may not have fully updated billing systems providing online billing capabilities. Generally, the practice of charging for paper bills seems to be a less common practice among the Quebec-based wireline providers such as Quebecor, Cogeco and small independents such as Telephone Milot.

Rebates, it should be noted, are often one-time incentives for consumers and seem to frequently be combined with promotional activity to encourage consumers to switch. However, the amount of the rebate is not the same as the subscribed fee for paper bills. While the fee is frequently \$2 per month, the rebate is often a one-time credit of between \$3 and \$5.

When questioned on the justification of applying this new fee for paper billing by the CRTC, Bell Canada cites the prospect theory of economics in the following response:

“The Companies could, for example, have increased the rates for all customers by \$2 and implemented a \$2 *discount* for users that choose to opt for e-billing, instead of a fee for paper. However, the Companies note that it has long been accepted in the field of behavioural economics that the value function is steeper for losses than for gains.⁴⁶ In other words, avoiding a loss (a fee) is more likely to result in a change of behaviour (eliminating paper) than a gain or discount would, even if the total amount spent by the consumer that continues to use paper is the same in both scenarios.”⁴⁷

This response appears to suggest that Bell Canada was scientifically applying behavioural economics principles when deciding on applying a fee for paper statements. However, Bell Canada has not provided any such research to the CRTC in its answers regarding why it instituted such a charge. Therefore an argument that profit motive may have been the ultimate driver of the decision to apply a fee for paper billing is equally plausible. As we see with members of the banking industry, collection of fees for paper statements is a new source of revenue for organizations choosing to apply them.

⁴⁶ Thaler, Richard, Mental Accounting and Consumer Choice. *J. Econ. Beh. Org.* 1 (March 1980): 39-60.

⁴⁷ Bell Canada, *Information Requested by the Canadian Radio-television and Telecommunications Commission*, Response, December 21, 2012. Last accessed January 16, 2014, at http://www.crtc.gc.ca/public/otf/2012/8480/b54_x/1812657.doc

The Cost of Telecom Paper Billing Fees to Canadians without Internet Access or Home Computers

An outstanding question is just how much revenue is collected in paper billing fees by communication service providers from Canadian consumers who lack of access to the internet or computers.

As was noted in the discussion above, 5.28% of survey respondents are effectively forced to pay extra fees to receiving paper bills and statements because they do not use computers, have access to the internet or cannot afford access to the internet. Using this 5.28% figure as representative of the Canadian population, we can estimate what paper bills fees charged by residential telephone, wireless telephone, and television providers will cost these consumers on an annual basis. Figure 2-4 reveals the size of various communication service markets in Canada.

Figure 2-4 Canadian Subscribers of Communications Services

<u>Type of Service</u>	<u>No. of Subscribers</u>
Home Internet	11.87 Million ⁴⁸
Wireless	27.9 Million ⁴⁹
Television (Cable, Satellite, IPTV)	11.97 Million ⁵⁰
Wireline Telephone	18.69 Million ⁵¹
Total:	70.43 Million

Using the total in Figure 2-4, we can determine that if 5.28% of Canadian subscribers pay the \$2 charge, Canadian communication service providers stand to earn an additional \$6.18 million per month or an estimated \$74 million per year, while offering little justification for the need for

⁴⁸ Canadian Radio-television and Telecommunications Commission, *Communications Monitoring Report*, 2013, p.146.

⁴⁹ Canadian Radio-television and Telecommunications Commission, *Communications Monitoring Report*, 2013, p.157.

⁵⁰ Canadian Radio-television and Telecommunications Commission, *Communications Monitoring Report*, 2013, p.111.

⁵¹ Canadian Radio-television and Telecommunications Commission, *Communications Monitoring Report*, 2013, p.137.

this charge.⁵² If this indeed is merely the exercise of economic theory on behalf of Canada’s communication and financial service providers, then it is fair to conclude it is a relatively expensive pill for consumers to digest. It appears particularly insensitive given recent findings in the BMO Annual Rainy Day Survey that 23% of respondents were already living paycheque to paycheque, while 17% had less than \$1,000 in savings.⁵³

Admittedly, this analysis has not taken into consideration the existence of the approximately 10 million subscriptions with bundled services that Canadians subscribed to in 2012.⁵⁴ However, even if in the best case scenario, where 10 million customers bundled the 3 applicable services listed in Figure 2-4, this would result in a collective annual cost of an estimated \$49 million for the 5.28% of consumers who had no internet access or did not use computers at all, if the charge to receive a paper bill is \$2 per statement.⁵⁵ As a result, we estimate the application of a \$2 monthly charge to receive a paper bill costs those Canadians who do not use computers or without internet access between \$49–74 million per year for their communications services alone. When these figures are added to the additional costs imposed by banks for receiving a paper statement discussed above, the estimated total cost to receive paper bills and statements for Canadian consumers who do not use computers or have internet access range from \$77 million to \$102 million annually.

Another expense from the consumer perspective that has not been considered thus far is the applicable goods and services and sales taxes to these paper billing fees. As a result, depending on where you live, between 5 and 15 percent needs to be added to the total to account for revenue the application of a paper bill fee generates for various governments. For instance, we can estimate the federal government receives an additional \$3.85 to \$5.1 million in revenue each

⁵² Total Canadian subscribers of Wireless, Television and Wireline services found in Figure 2.4, multiplied by 5.28%, multiplied by \$2 for the monthly figure. (58,560,000 x 0.0528 x 2 = 6,183,936). This figure is then multiplied by 12 for the annual figure of \$74,207,232.

⁵³ BMO, *BMO Annual Rainy Day Survey: Majority of Canadians Have Less Than \$10,000 Set Aside in Emergency Savings* (7 August 2013). Last accessed March 3, 2014 at <http://newsroom.bmo.com/press-releases/bmo-annual-rainy-day-survey-majority-of-canadians-tsx-bmo-201308070890662001>

⁵⁴ Canadian Radio-television and Telecommunications Commission, *Communications Monitoring Report*, 2013, p.ii.

⁵⁵ This figure was arrived at using the following equation. 10,000,000 “bundled customers” were subtracted from each of the figures listed in Figure 2-4. The remaining figures were summed and 10,000,000 were added to that total. That number was multiplied by 5.28%, then by \$2, then by 12 months.

Wireless	17,900,000
Television	1,970,000
Wireline	8,690,000
Bundled	<u>10,000,000</u>
Total	38,560,000
5.28% no internet/computer	<u>x 5.28%</u>
	2,035,968
\$2 fee	<u>x \$2</u>
	4,071,936
12 months	<u>x 12 Months</u>
Annual Cost	\$48,863,232

year from Canadian consumers who do not use computers or have internet access due to the application of the Goods and Services Tax.⁵⁶

As a result of this analysis, we remain particularly concerned that paper bill fees have a disproportionately harmful effect on vulnerable and low-income consumers. As we have seen here, the vast majority of the 5.28% of consumers who had no internet access or did not use computers at all have no choice but to pay these fees. Moreover, the 2010 Canadian Internet Use Survey reported that only 54% of households in the lowest income quartile had home internet access, versus 97% in the highest quartile.⁵⁷ The survey undertaken for PIAC found that 48% of respondents with annual family incomes under \$30,000 pay bills in person or by mail.⁵⁸

As a result, these consumers are more likely to pay the paper bill fee because e-billing would impose additional burdens and costs that would exceed the monthly fee, including finding access to a computer, internet and e-mail. Given these circumstances, paper bill fees appear to disproportionately and negatively penalize lower income consumers.

It is also evidence that Canadian seniors have been disproportionately affected by the applications of these monthly fees. The Canadian Internet Use Survey found that only 51% of those aged 65 to 74 and 27% of those aged 75 years and older used the Internet, compared with 94% of individuals under the age of 45 and 80% of those aged 45 to 64.⁵⁹ Moreover, a 2012 survey conducted by the Canadian Association of Retired Persons (CARP) found that 75% of respondent members disagreed with banks and utilities charging for paper bills.⁶⁰ Two-thirds of members characterized paper billing as "not such a good thing," with 44% of all respondents said this was primarily because seniors do not have computers, 11% said it was because seniors preferred paper bills for bookkeeping, and 9% said it was because it would cost more for those on fixed incomes.⁶¹ This supports evidence found in PIAC's survey where 43% of respondents age 60 or over stated they were either "not very" or "not at all" comfortable with receiving bills or invoices online.⁶² Moreover, 51% of respondents over the age of 60 pay the majority of their bills by mail or in-person.⁶³ As a result, we suspect that seniors are a significant contributor to the

⁵⁶ This figure was arrived at using the following equations: $\$77,000,000 \times 5\% = \$3,850,000$ and $\$102,000,000 \times 5\% = \$5,100,000$

⁵⁷ Statistics Canada, *Canadian Internet Use Survey*, (25 May 2011). Last accessed March 3, 2014 at <http://www.statcan.gc.ca/daily-quotidien/110525/dq110525b-eng.htm>

⁵⁸ PIAC, *Paying For Paper Bills Survey*, Conducted by Environics Research Group, October 2013

⁵⁹ Statistics Canada, *Canadian Internet Use Survey*, (25 May 2011). Last accessed March 3, 2014 at <http://www.statcan.gc.ca/daily-quotidien/110525/dq110525b-eng.htm>

⁶⁰ CARP, *CARP Seniors' Discounts Poll Report* (27 July 2012), p.7. Last accessed March 3, 2014 at <http://www.carp.ca/wp-content/uploads/2012/07/Senior-Discounts-reportNEW.pdf>

⁶¹ CARP, *CARP Seniors' Discounts Poll Report* (27 July 2012), p.8. Last accessed March 3, 2014 at <http://www.carp.ca/wp-content/uploads/2012/07/Senior-Discounts-reportNEW.pdf>

⁶² PIAC, *Paying For Paper Bills Survey*, Conducted by Environics Research Group, October 2013.

⁶³ PIAC, *Paying For Paper Bills Survey*, Conducted by Environics Research Group, October 2013

estimated \$77 to \$102 million Canadian consumers who do not use computers or have internet access pay service providers annually for paper bills and statements.

Figure 2-5 Estimated Annual Cost to Receive Paper Bills for Canadian Consumers Without Internet Access or Not Using Computers

<u>Type of Service</u>	<u>Estimated Annual Cost</u>
Banking	\$28 Million
Communication Services (Phone, T.V., Wireless)	\$49 – 74 Million
Total Annual Cost	\$77 – 102 Million*

*Plus applicable sales taxes

But What about the Rest of Canadians?

Now that we have estimated the annual cost of paying additional fees to receive paper bills and statements for those Canadian consumers who don't use computers or have internet access, can we estimate what this costs Canadian consumers in general? According to PIAC's 2013 survey, 94.72% of respondents indicated they used computers, and could afford internet access.⁶⁴ If we assume 1 in 10 of the 94.72% of respondents decided to pay the additional fee of \$2 per service to receive paper bills and a bank statement each month, we can form a reasonable idea of what this change in billing policy is costing those Canadian consumers on an annual basis. We have also added an assumption that 3 in 10 Canadian with internet access receive paper bills and statements for the sake of comparison. This figure was not chosen at random. The results of our survey indicate 56% of respondents were aware of being notified of being charged a fee to receive a paper bill. Of those who were aware, 54% of those respondents paid this extra fee. As a result, we can estimate that 30% (56% x 54% = 30.24%) of all respondents have paid for a monthly paper bill or statement. Moreover, the CRTC's paper billing

⁶⁴ PIAC, *Paying For Paper Bills Survey*, Conducted by Environics Research Group, October 2013

fact-finding mission found that 67% of Canadians reported using online banking in 2013.⁶⁵ Afterwards, we will add the figures above to obtain a better sense of the impact of these fees are among the Canadian public. We add these totals together since, regardless of the circumstances, those individuals not using computers or the internet will have to pay these fees.

Estimated Cost of Paper Billing Fees-Financial Statements

To estimate the annual cost of receiving paper banking statements for 10% and 30% of Canadians indicating they had internet access, we begin with the number of bank accounts potentially subject to a \$2 paper billing fee we previously calculated – 22, 276,800. We will once again work under the assumption that each customer has one bank account. We then multiply that figure by 10% and 30% of Canadians with internet access choosing to receive a paper statement ($94.72\% \times 10\% = 9.47\%$ and $94.72\% \times 30\% = 28.41\%$). Using these figures, we can estimate the annual cost to these consumers in the following manner:

⁶⁵ CRTC, *Results on the fact-finding exercise on fees for paper bills*, (July, 2014), p.8. Last accessed July 23, 2014 at <http://www.crtc.gc.ca/eng/publications/reports/rp140723.htm>

Figure 2-6 Estimated Annual Cost to Receive Paper Banking Statements if 10% or 30% of Canadian Consumers with Internet Access Opted to Receive Paper Bills

	If 10% of Canadians with Internet opted for Paper Bills	If 30% of Canadians with Internet opted for Paper Bills
Number of banks accounts potentially subject to the \$2 fee	22,276,800	22,276,800
% of Canadians	x 9.47%	x 28.41%
Number of Applicable Bank Accounts	2,109,613	6,328,839
Application of \$2 monthly fee for paper statement	x \$2	x \$2
Estimated Monthly cost to Canadian consumers with internet access to receive monthly bills in paper	\$4,219,226	\$12,657,678
	X 12 Months	X 12 Months
Estimated Annual Cost	\$50,630,711	\$151,892,133

Estimated Cost of Paper Billing Fees-Communications Services

To estimate the annual cost of receiving paper bills issued by communication service providers for 10% or 30% of Canadians indicating they had internet access, we will make two sets of calculations. The first will take into account the presence of service bundling, and the second set of calculations will remove that assumption. The result will create a range of estimated expenditure that Canadians with internet access choose to pay communications service providers to receive paper bills.

Accounting for Bundled Customers

Again, using the 9.47% figure representing the 10% (and 28.41% for 30%) of Canadians with internet access choosing to receive a paper statement, along with the figures contained in Figure 2-4, we can estimate the annual cost of receiving paper bills to consumers who bundled all 4 communications services.

To account for the bundled accounts, 10 million is removed from each of the totals found in Figure 2-4, then added to the remaining accounts to estimate how many accounts are potentially subject to the monthly paper billing fee:

Service	Number of Subscribers
Internet	1,187,000
Wireless	17,900,000
Television	1,197,000
Wireline	8,690,000
Bundled	10,000,000
Total	38,974,000

This figure can then be used to calculate the estimated annual cost for bundled customers to obtain paper bills.

Figure 2-7 Estimated Annual Cost to Receive Paper Banking Statements for Communication Services Customers if 10% or 30% of Canadian Consumers with Internet Access Opted to Receive Paper Bills – Accounts for “Bundled” Customers

	If 10% of Canadians with Internet opted for Paper Bills	If 30% of Canadians with Internet opted for Paper Bills
Number of Customers (accounts for “Bundled” Customers)	38,974,000	38,974,000
% of Canadians	X 9.47%	X 28.41%
Estimated Number of Canadians with Internet Access paying paper bill fee	3,690,838	11,072,513
\$2 monthly paper billing fee	X \$2	X \$2
Estimated monthly cost	\$7,381,675	\$22,145,027
12 Months	X 12	X 12
Estimated Annual Cost of paper bill fees to Canadians with Internet Access if bundled services accounted for	\$88,580,107	\$265,740,322

Not Accounting for Bundled Customers

In this scenario we remove the possibility of Canadian consumers bundling their services. Since it is unrealistic to believe every Canadian consumer of communication services bundles all 4 services listed (T.V., Internet, Wireless and Wireline), we wish to generate a range of estimated annual costs for paper billing. We contend by providing a range, it will more accurately reflect the real cost to Canadians to receive a paper bill for communication services.

To estimate the annual cost of receiving paper bills for communication services for 10% and 30% of Canadians indicating they had internet access was calculated below, with the assumption no customer bundled these services. We begin by using the number of Canadian customers for each communication service found in Figure 2-4:

Figure 2-8 Estimated Annual Cost to Receive Paper Banking Statements for Communication Services Customers if 10% or 30% of Canadian Consumers with Internet Access Opted to Receive Paper Bills – Not Accounting for “Bundled” Customers

	If 10% of Canadians with Internet opted for Paper Bills	If 30% of Canadians with Internet opted for Paper Bills
Number of Customers	70,430,000	70,430,000
% of Canadians	X 9.47%	X 28.41%
Estimated Number of Accounts with Internet subject to paying monthly paper bill fee	6,669,721	20,009,163
\$2 monthly paper billing fee	X \$2	X \$2
Estimated monthly cost	\$13,339,442	\$40,018,326
12 Months	X 12	X 12
Estimated Annual Cost of paper bill fees to Canadians with Internet Access if bundled services not accounted for	\$160,073,304	\$480,219,912

As a result of these calculations, we can now generate an estimate of the annual cost of paper billing and statement fees if 10% or 30% of Canadian communication services customers chose to receive paper bill each month. In addition, we can also add the estimated annual cost to receive paper pills for the 1 in 10 (and 3 in 10) Canadian consumers with internet access to the cost to those Canadians without internet access or not using computers. We believe this range of figures will provide a realistic estimate of how much annually the policy of applying a fee to receive a paper bill or statement is currently costing Canadian consumers.

Figure 2-9 Estimated Annual Cost to Receive Paper Bills for 1 in 10 and 3 in 10 Canadian Consumers With Internet Access.

<u>Type of Service</u>	<u>Estimated Annual Cost</u> <i>if 1 in 10 Canadians with Internet Receive Paper Bills</i>	<u>Estimated Annual Cost</u> <i>if 3 in 10 Canadians with Internet Receive Paper Bills</i>
Banking	\$50 Million	\$152 Million
Communication Services (Phone, T.V., Wireless)	\$88 – 160 Million	\$266 - 480 Million
Total Annual Cost	\$138 – 210 Million*	\$418 – 632 Million*

*Plus applicable sales taxes

Figure 2-10 Estimated Annual Cost to Receive Paper Bills for 1 in 10 or 3 in 10 Canadian Consumers with Internet Access, Canadians Without Internet Access and Canadians Not using Computers.

<u>Type of Service</u>	<u>Estimated Annual Cost</u> <i>if 1 in 10 Canadians with Internet Receive Paper Bills</i>	<u>Estimated Annual Cost</u> <i>if 3 in 10 Canadians with Internet Receive Paper Bills</i>
Banking	\$78 Million	\$180 Million
Communication Services (Phone, T.V., Wireless)	\$137 – 234 Million	\$315 - 554 Million
Total Annual Cost	\$215 – 312 Million*	\$495 – 734 Million*

*Plus applicable sales taxes

Figure 2-9 indicates that if 1 in 10 Canadians who have internet access choose to receive paper bills or statements that cost \$2 each month, the cost to those Canadians is estimated to be between \$138 million and \$210 million per year. If 3 in 10 Canadians who have internet access receive paper bills or statements that cost \$2 each month, this estimated figure rises to between \$418 million and \$632 million per year.

Figure 2-10 simply adds these figures to the estimate found in Figure 2-5 calculating the annual cost for paper bills and statements to Canadians who do not use computers or have internet access - \$77 to \$102 million. As a result, we estimate the cost of paper bill fees for those Canadians who receive them to be between \$215 million and \$312 million annually if 1 in 10 Canadians who have internet access choose to receive paper bills or statements. If 3 in 10 Canadians who have internet access pay for paper bills, the estimated annual cost to Canadian consumers is between \$495 million and \$734 million.

As you will recall earlier in this examination, these estimated fees for receiving a paper bill or statement are also subject to applicable sales and services taxes. As a result, depending on where you live, between 5 and 15 percent needs to be added to the total to account for revenue the application of a paper bill fee generates for various governments. Therefore, under the assumption that 1 in 10 Canadians with internet access pay for paper bills, we estimate the federal government receives an additional \$10.75 to \$15.6 million in revenue each year from Canadian consumers to receive a paper bill or statement on a monthly basis.⁶⁶ If 3 in 10 Canadians with internet access pay for paper bills, the estimates federal tax collected is \$24.7 to \$36.7 million annually. Except for the province of Alberta and the 3 Territories, Canadian jurisdictions apply a provincial sales tax between 7% and 10% which would also be applied to paper billing fees.

Summary

We noted that a number of banks and wireless service providers have been offering statements and bills online as an option to Canadians consumers for a number of years. However, it has only been since 2010 that some service providers have charged customers extra fees to continue receiving printed statements. As a result of the CRTC's interest, we were able to review billing practice information from telecommunications service providers. Many providers cited the environmental benefits of providing online statements, although there is evidence these impacts are mitigated by consumers printing their online statements at home.

⁶⁶ This figure was arrived at using the following equations: $\$215,000,000 \times 5\% = \$10,750,000$ and $\$334,000,000 \times 5\% = \$15,400,000$

A potential unintended consequence of applying these additional fees is that some consumers could be putting themselves at risk financially by opting for online billing in order to save the monthly fee for a paper bill. Evidence from Britain suggests households who prefer to pay their bills by traditional paper methods in that country are typically paying an additional £276 annually, due to paper billing fees. This is a significant issue in a country where 8 million residents have never used the internet, including 5 million seniors.

A survey conducted for PIAC found 15% of Canadian respondents who were not comfortable with receiving their bills electronically, had no internet access or did not use computers at all. Therefore this compels a number of Canadians to pay the extra fee simply because they do not have access to the internet or have a computer in their home. Using the figures obtained in our survey of Canadian consumers, we estimate that Canadians that do not use computers, do not have internet access or cannot afford internet access will pay an additional \$28 million per year to obtain bank account statements. Moreover, they will pay an estimated \$49 million to \$74 million annually to receive paper bills from wireless, television and wireline (landline) service providers. We also found evidence paper bill fees appear to disproportionately and negatively penalize lower income consumers, including seniors. When we imposed the assumption that 1 in 10 Canadian consumers with internet access preferred to receive paper bills and statements, we estimated the total cost to all consumers receiving paper bills and statements is between \$215 million and \$312 million annually. When we imposed the assumption that 3 in 10 Canadian consumers with internet access preferred to receive paper bills and statements, we estimated the total cost to all consumers receiving paper bills and statements is between \$495 million and \$734 million annually. All of these estimated figures would be subject to applicable sales taxes.

Section 3 Canadian Consumers Have Their Say

In order to understand the exposure of Canadians to various billing practices, and assess their comfort and interest in various methods of billing, PIAC undertook a quantitative study. The questionnaire-based study was conducted by Environics Research Group in late August and early September of 2013. The study had three general areas of inquiry: how consumers receive their bills, how consumers pay their bills and whether consumers pay to receive paper bills. Beyond these inquiries, the questionnaire also asked consumers their opinion of corporate policies to pay for paper bills.

Our research points to an important consideration which service providers who impose paper billing charges appear to have overlooked. These service providers who apply such charges appear to assume that all Canadians are familiar and comfortable with the e-billing process. This, however, is simply not true.

Methodology

PIAC commissioned Environics Research Group to conduct a survey of Canadians' views of the imposition of extra fees for paper billing. The survey was conducted over the phone with 2,005 individuals across Canada, aged 18 years or older, between 27 August and 1 September 2013. This included 1,004 male and 1,001 female respondents. The margin of error for a sample of this size is +/- 2.10%, 19 times out of 20. Practices standard with Environics Research Group's quality control and sample selection processes were used to create this study, including adherence to standards set out by the Marketing Research and Intelligence Association (MIRA).

The study consisted of 13 questions created to gauge the use, comfort and understanding of Canadians with electronic billing for services. There are three distinct parts to the questionnaire, assessing: 1) how consumers receive bills currently as well as their comfort with receiving electronic bills; 2) how consumers pay bills and whether they are comfortable paying bills online; and 3) whether consumers pay to receive their paper bills and their agreement with this method of billing.

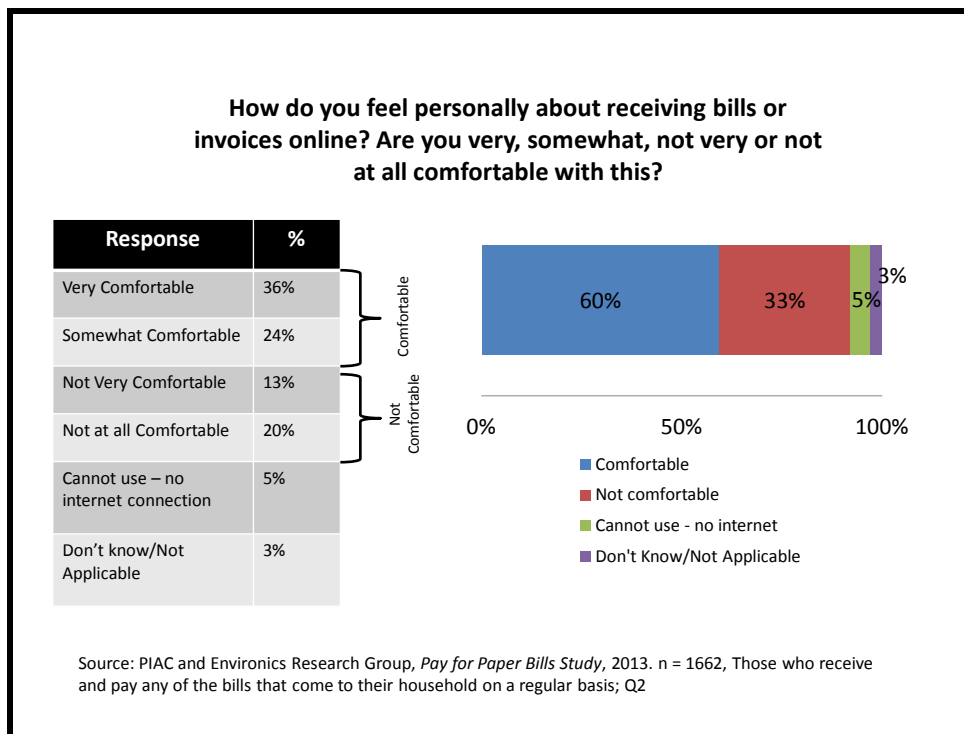
These questions included 5 that used a Likert scale for responses; providing consumers the opportunity to indicate their degree of comfort or agreeability with concepts and ideas. For these questions a 4-point scale was used (with no mid-point provided to respondents) and each question provided respondents with the ability to, essentially, opt-out and respond "Don't know/Not applicable" where appropriate. Other questions included single response and multiple response questions. The results of the survey can be found in Appendix B.

Results

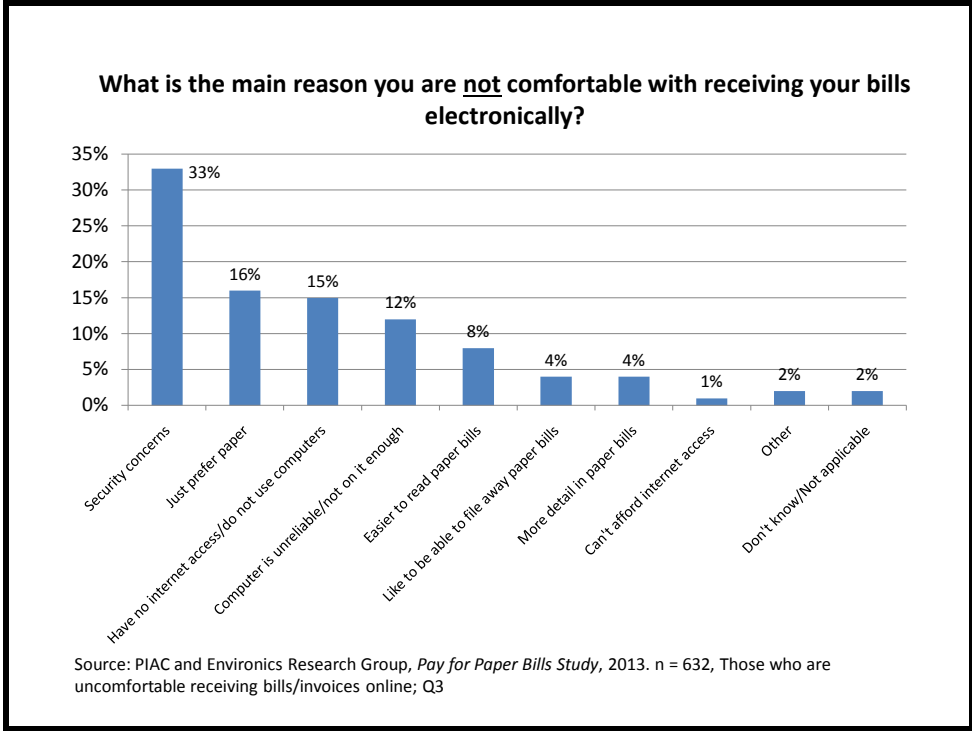
Receipt of Bills

In order to establish whether respondents were responsible for, or familiar with, receiving or paying for bills, we first investigated the rate of receipt of bills per household. Our study results show that 83% of respondents receive their bills in some form at their household. This rate of receipt was generally consistent across demographic groups.

The Environics Survey showed that 33% of respondents are “not very comfortable” or “not at all comfortable” with receiving bills or invoices online, with another 5% stating they could not receive online bills even if they wanted to because they had no internet access. This response rate increases with the age of respondents – 43% of respondents age 60 or over stated they were either “not very” or “not at all” comfortable with receiving bills or invoices online. Furthermore, students (40%) and the unemployed (41%) show a greater degree of discomfort with receiving bills online than the general population.



Survey participants cited a number of reasons for this discomfort, including security concerns (33%), just preferring paper (16%), having no internet access or not using computers at all (15%), not feeling comfortable enough using computers (12%), and finding it easier to read paper bills (4%).

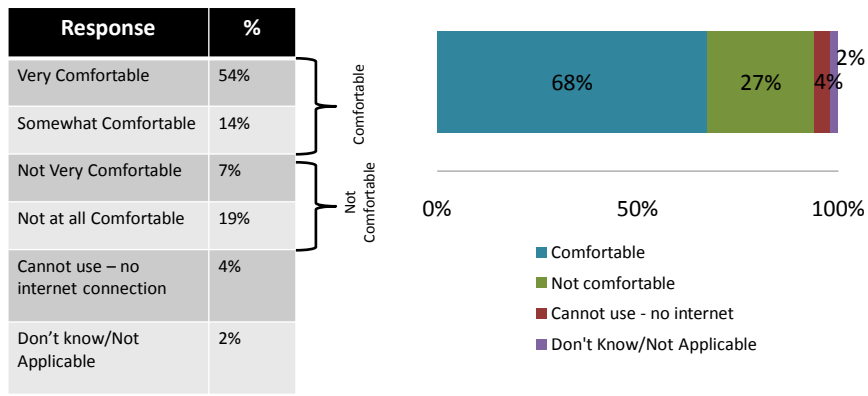


Paying Bills

When asked about how consumers pay their bills, respondents revealed that 60% pay the majority of their bills online, 33% pay mostly by mail or in person and 5% pay equally online and by mail/in person. These results change dramatically when considering the respondent demographic groups. In particular, as a respondent’s age increases so too does their likelihood to pay bills mostly in-person or by mail. Of those aged 60 or over, 51% of respondents pay the majority of their bills by mail or in-person. This compares to those who are 45-59 years of age (31%), ages 30-44 (19%) or 18-29 (25%) who pay most of their bills in-person or by mail. Likewise, those with lower incomes show a stronger propensity to pay bills by mail or in-person – fully 48% of respondents with annual family incomes under \$30,000 pay bills in this manner.

When asked about their comfort with paying bills online or electronically, 68% of respondents state that they are comfortable with doing this (respondents said they were either “very comfortable” or “somewhat comfortable”). However, 27% were not comfortable with making electronic payments (either “not very comfortable” or “not at all comfortable”). Further, 4% of respondents do not have an internet connection that would allow them to pay bills and 2% don’t know or believed the question was not applicable.

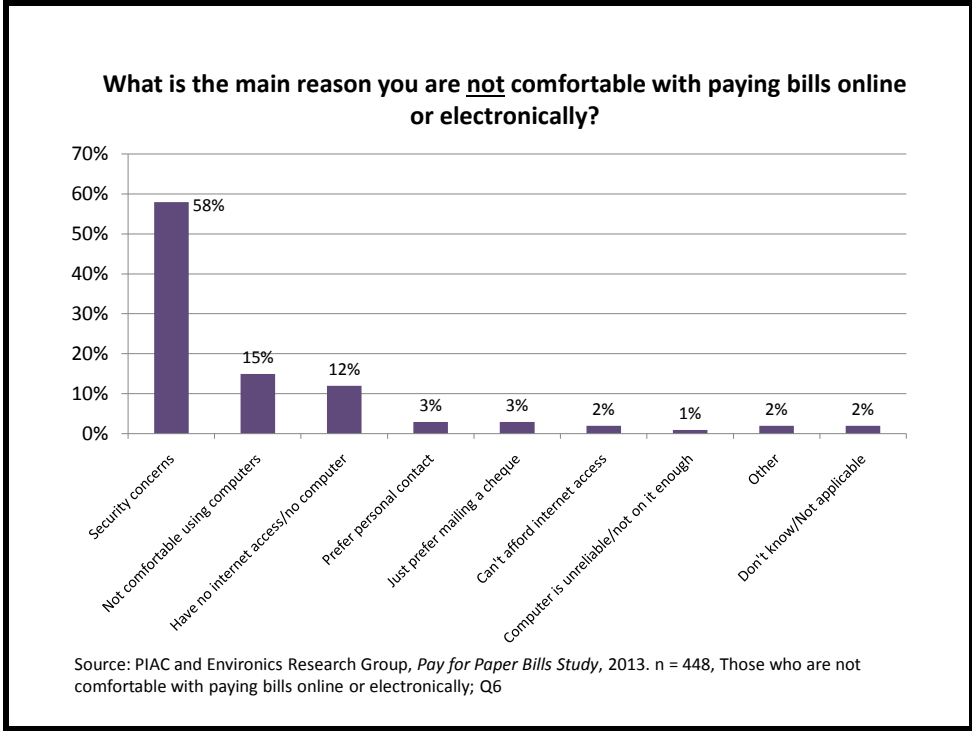
How do you or would you feel about paying your bills online or electronically? Are you very, somewhat, not very or not at all comfortable with doing this?



Source: PIAC and Environics Research Group, *Pay for Paper Bills Study*, 2013. n = 1718, Those who receive and pay any of the bills that come to their household on a regular basis; Q5

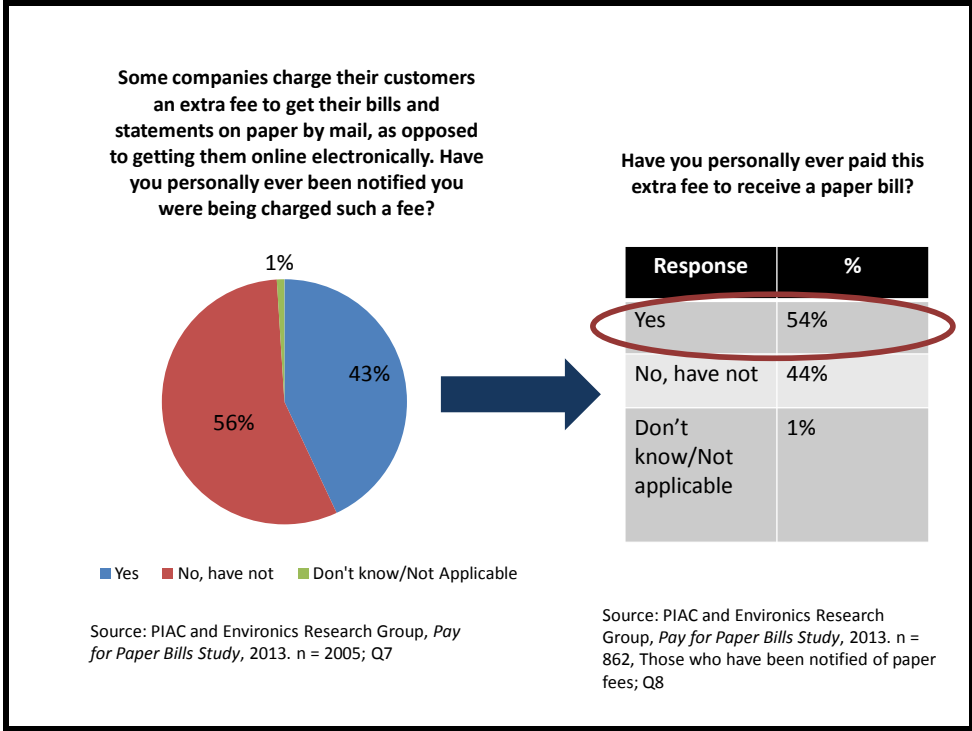
Among those who stated they were uncomfortable with paying bills online, a number of reasons were provided as to why they felt this way. The most popular response among participants was concerns about security (58%). Other important considerations causing concerns included respondents who:

- were not comfortable using computers (15%);
- have no internet access or no computer (12%);
- prefer personal contact (3%);
- simply prefer to mail a cheque (3%);
- can't afford internet access (2%); and,
- have an unreliable computer or do not use it enough (1%).

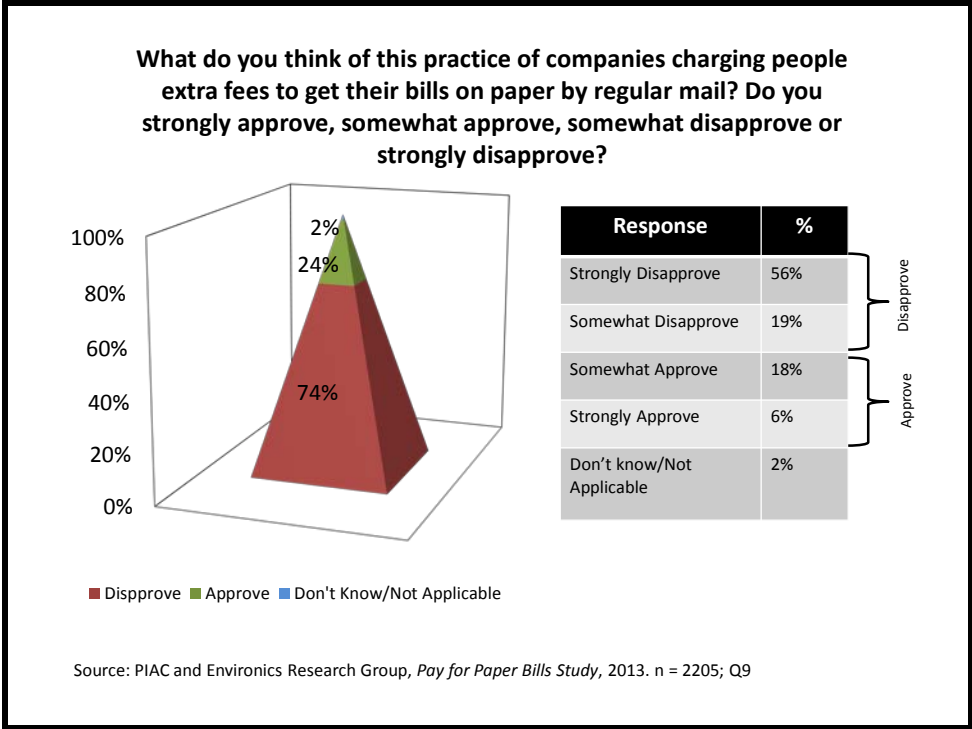


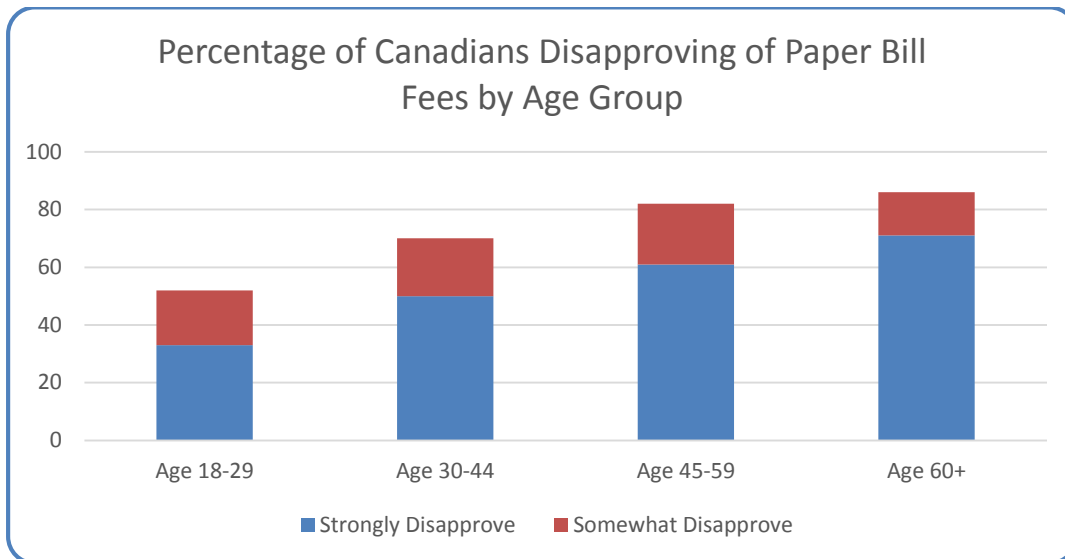
Consumer Opinion of Paying for Paper Bills

Interestingly, our study results show consumers may not be made readily aware of changes to billing policies and fees for paper bills by some corporations. When asked “Some companies charge their customer an extra fee to get their bills and statements on paper by mail, as opposed to getting them online electronically. Have you personally ever been notified you were being charged such a fee?” only 43% of respondents indicated that they had been notified of this policy change despite the wide-spread use of fees among communication service providers and the banking industry. Also, 56% of respondents indicated they had not heard of the pay-for-paper bills policy and 1% didn’t know or believed the question not applicable. Among those who had been notified there would be a cost for paper bills, 54% had paid a fee to receive a paper bill while 44% had not done so.



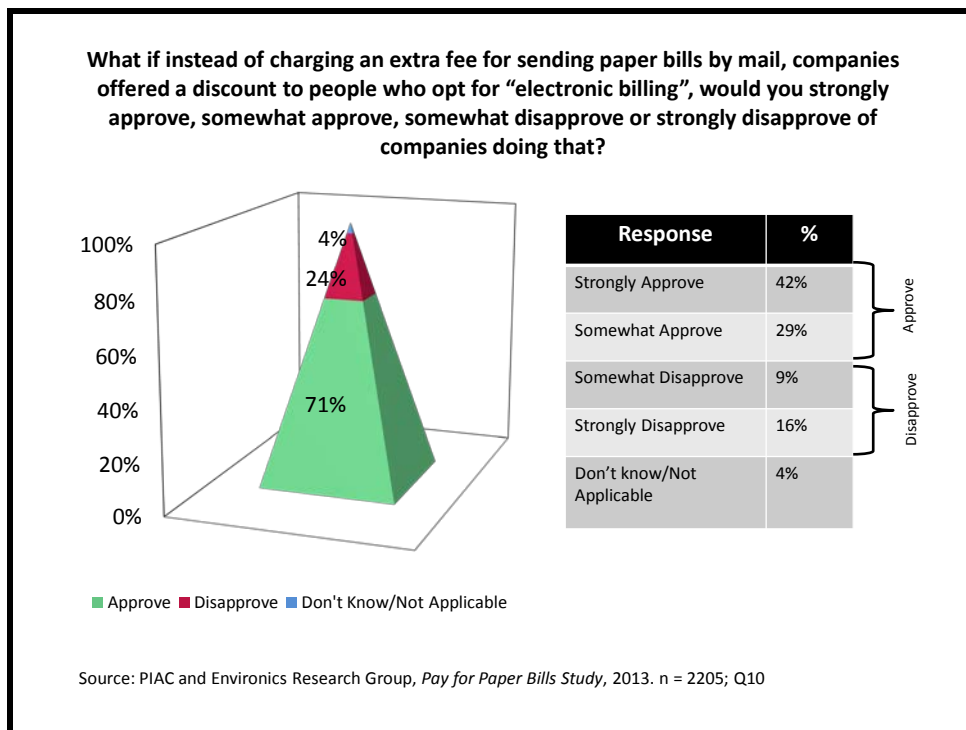
The survey showed most Canadians disagree with the institution of a paper bill fee. Responses obtained by Environics showed 74% of respondents somewhat disapproved or strongly disapproved (56%) of companies charging people extra fees “to get their bills on paper by regular mail.” Across demographic groups many respondents disapproved of this practice.





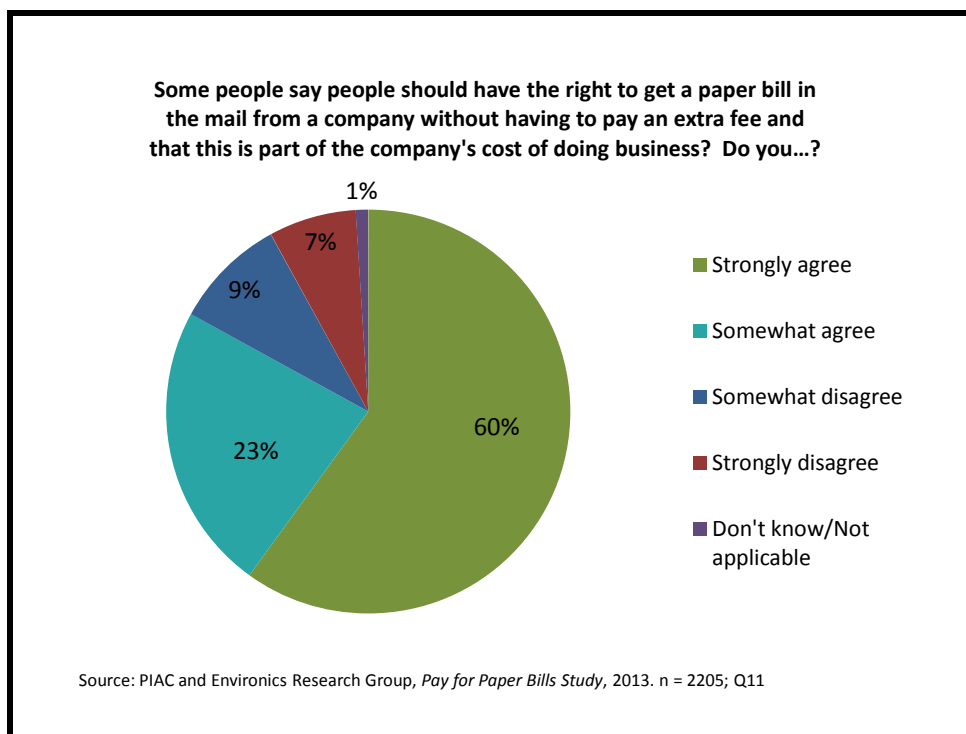
Source: PIAC and Environics Research Group, *Pay for Paper Bills Study*, 2013. n = 2205; Q9

Respondents showed much greater approval for the offering of a discount for those who opt for electronic billing versus the application of a fee for receiving a paper bill. Among respondents, 71% indicated that they “strongly” or “somewhat” approved of offering an electronic billing discount, compared with 24% who disapproved, either “somewhat” or “strongly” of providing a discount for consumers. Those in younger age demographics, such as those age 18-29 (83%) and 30-44 (80%), were much more likely to support the concept of a discount.

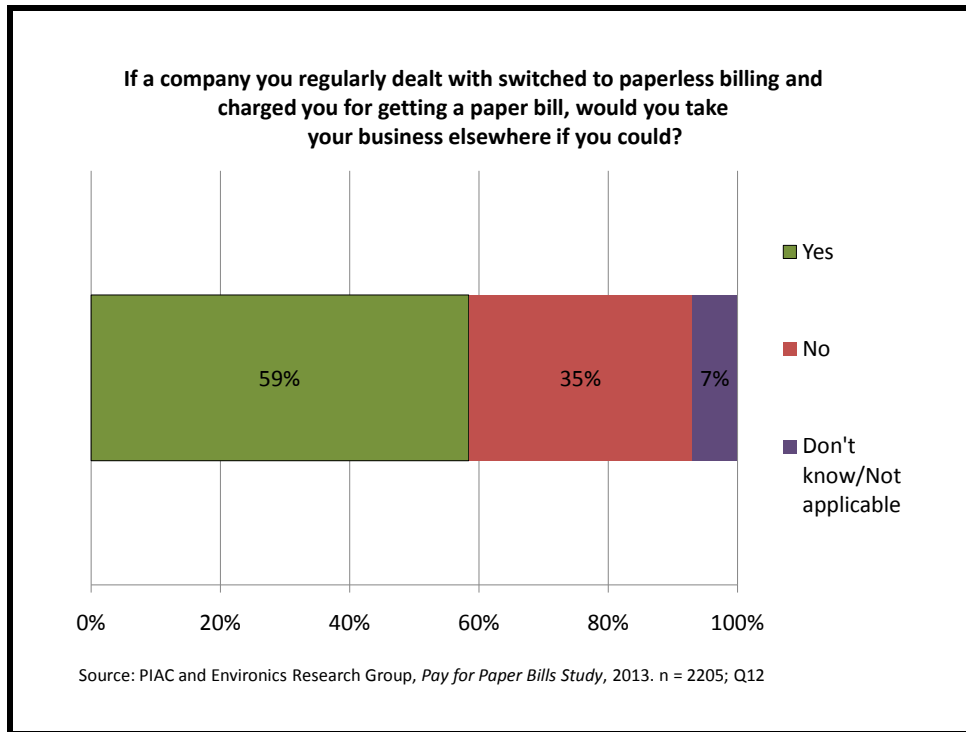


Source: PIAC and Environics Research Group, *Pay for Paper Bills Study*, 2013. n = 2205; Q10

Of the survey respondents, in total 83% somewhat agreed (23%) or strongly agreed (60%) that people should have the right to get a paper bill in the mail from a company without having to pay an extra fee and that this was part of the company's cost of doing business. These sentiments were generally expressed across all demographic groups.



Perhaps most revealing is that 59% of respondents indicated that if a company they dealt with switched to paperless billing and charged customers to receive a bill, they would take their business elsewhere. Those who were students (61%) or unemployed (69%) indicated that they were among the most interested in changing providers.



Conclusion

The results of our study provides evidence that despite the growth of receiving bills and paying of bills online, many consumers do not wish to be forced to transact personal financial matters in this way. Instead consumers seem interested in having the option of conducting bill transactions online, but respondents still see value in paper-based billing and in-person transactions. Evidence suggests this is particularly true among those demographic groups who are sensitive to being forced to receive and pay bills online, such as older adults. Still the majority of demographic groups react negatively to the imposition of fees for paper billing. This challenges assumptions often made by communication service providers that consumers wish to switch to online transactions and avoid paper bills. Thus, for many consumers the ability to choose how they receive and pay bills remains an important feature of services.

Section 4 – Stakeholder Input

Thus far, we have reviewed the practice of paying for a paper bill and examined the various approaches to the issue by service providers. In addition, we have analyzed the results of survey research indicating what consumers felt regarding elements of the practice of paying for a paper bill. This section will reveal the views of other stakeholders on issues related to this practice. Much of the evidence for this section rests upon the responses received to a questionnaire distributed by PIAC.

How are Consumer Complaints on Billing Practices Handled?

It was surprising to find a number of provincial consumer affairs offices have not received complaints about the introduction of the practice of paying for a paper bill.⁶⁷ However, the response from Service NL, a government department in the province of Newfoundland and Labrador, was telling:

“We have had inquiries but no registered complaints because we see no Newfoundland and Labrador consumer laws or regulations which could be cited or used to support such a complaint.”⁶⁸

This response may raise an issue that is outside the scope of this examination, but may be worthy of further scrutiny. The concern relates to how inquiries are taken at provincial consumer affairs ministries. How many “inquiries” are made each year by consumers that are not enumerated based on the assessment that provincial consumer protection law doesn’t apply to the practice, so no complaints can be registered? Based on this logic, one could contend that if provincial consumer protection law doesn’t exist on a subject, consumers are left to their own devices when they feel they are being mistreated by product and service providers.

Other stakeholders, such as the Commissioner for Complaints for Telecommunications Services (CCTS), have received complaints. The CCTS noted the issue of having to pay a fee to obtain paper billing was raised in 46 complaints in 2011-2012.⁶⁹ Moreover, the CCTS received 58 additional complaints about paper billing fees that were assessed as being outside of their mandate and were therefore not accepted.⁷⁰ Virtually all of the 104 complaints received by CCTS

⁶⁷ Service NL, *Response to PIAC questionnaire* (2013), Government of Nunavut, Department of Community and Government Services, *Response to PIAC questionnaire* (2013), and Government of Saskatchewan, Financial and Consumer Affairs Authority, *Response to PIAC questionnaire* (2013).

⁶⁸ Service NL, *Response to PIAC questionnaire* (2013).

⁶⁹ Commissioner for Complaints for Telecommunications Services (CCTS), *Response to PIAC questionnaire* (2013).

⁷⁰ CCTS, *Response to PIAC questionnaire* (2013).

paying for paper billing in 2011-2012 were from individual retail consumers.⁷¹ By comparison, the CCTS accepted 77 complaints on this issue in 2012-2013, an increase of over 60%.⁷² The CCTS noted that overall, their average complaints accepted increased about 27% between 2011-2012 and 2012-2013.⁷³

The CCTS policy on questions relating to the practice of paper billing is if a customer indicates that his complaint is solely about the service provider's *practice/policy* of charging a fee to obtain a paper bill and the requested resolution is that this practice/policy be changed, CCTS is unlikely to accept the complaint.⁷⁴ The CCTS noted their Procedural Code precludes them from issuing Recommendations or Decisions requiring a service provider to change its practices and/or policies.⁷⁵

If the complaint also raises issues that are within the mandate of the CCTS, such as those that are of a service delivery or contractual nature, they will accept the complaint.⁷⁶ For example, if a customer indicates that his agreement with his service provider did not allow for a fee for paper billing and that his service provider is now charging him such a fee, CCTS would accept the complaint.⁷⁷ CCTS may refer complaints that it cannot accept to another organization that is better suited to assist the customer.⁷⁸ It may also send the matter to the service provider in question as a *referral* so that it is aware of the situation and can respond to its customer's concern.⁷⁹

The Office of the Superintendent for Financial Institutions (OSFI) also acknowledged they do receive some consumer concerns and complaints related to billing and fees.⁸⁰ OSFI noted when they receive concerns and complaints consumers are directed to the appropriate provincial or federal agency.⁸¹ Other organizations, such as Service NL and the Government of Saskatchewan's Financial and Consumer Affairs Authority (FCAA), indicated a similar approach to concerns raised by consumers they felt were outside the scope of their respective mandates.⁸²

⁷¹ One of the 104 complaints cited by CCTS in 2011-2012 was registered by a small business. Service NL and Union des consommateurs also noted all complaints received were from consumers.

⁷² CCTS, *Correspondence with PIAC*, March 24, 2014, from CCTS, *2012-2013 Annual Report*, November 6, 2013. p. 33. Last accessed March 24, 2014 at <http://www.ccts-cprst.ca/documents/annual-reports/2012-2013>

⁷³ CCTS, *Correspondence with PIAC*, March 24, 2014

⁷⁴ CCTS, *Response to PIAC questionnaire* (2013).

⁷⁵ CCTS, *Response to PIAC questionnaire* (2013).

⁷⁶ CCTS, *Response to PIAC questionnaire* (2013).

⁷⁷ CCTS, *Response to PIAC questionnaire* (2013).

⁷⁸ CCTS, *Response to PIAC questionnaire* (2013).

⁷⁹ CCTS, *Response to PIAC questionnaire* (2013).

⁸⁰ Office of the Superintendent for Financial Institutions (OSFI), *Correspondence with PIAC*, June 10, 2013.

⁸¹ OSFI, *Correspondence with PIAC*, June 10, 2013.

⁸² Service NL, *Response to PIAC questionnaire* (2013) and Government of Saskatchewan, Financial and Consumer Affairs Authority, *Response to PIAC questionnaire* (2013).

The Union des consommateurs have occasionally received complaints from consumers who received a notice from wireless communication service providers and credit card providers informing them that from now on charges will be applicable for the sending of paper bills.⁸³ However, since their organization is a federation of various consumer groups across Quebec they did not catalogue individual complaints received from consumers.⁸⁴ The regional consumer groups members of Union des consommateurs (Associations coopératives d'économie familiale) expressed concerns, contending it becomes more difficult for many consumers without computers to have access to services they seek using traditional methods of communication.⁸⁵ Some of the complaints received concern the rarity of free paper billing and the difficulty to obtain in-person services from governmental authorities.⁸⁶

How do Organizations Protect Consumers Feeling Mistreated by Service Providers Charging for Paper Bills?

The CCTS noted its mandate is to determine whether a service provider reasonably fulfilled its obligations pursuant to the applicable contract (or terms of service) and followed its usual policies and operating procedures in dealing with the customer.⁸⁷ Customers who feel their service providers have not reasonably fulfilled their obligations can have their complaints independently reviewed by CCTS, free of charge.⁸⁸ In 2011-2012, CCTS resolved over 90% of complaints concluded to the customer's satisfaction.⁸⁹

The Union des consommateurs has been attempting to entice changes to consumer protection laws in order for the practice of charging for paper bills to be prohibited.⁹⁰ Since 2009, Union des consommateurs has been participating in public consultations on a third phase of modifications to the *Quebec Consumer Protection Act* (CPA).⁹¹ During this process, UC has demanded the CPA include a provision to prohibit charging extra fees to consumers who receive a paper bill.⁹²

At the present time, none of the respondents to our questionnaire who represented governmental agencies indicated those agencies developed information materials or guidelines which may assist consumers facing these new charges. Rogers Communications, however,

⁸³ Union des consommateurs (UC), *Response to PIAC questionnaire* (2013)

⁸⁴ UC, *Response to PIAC questionnaire* (2013)

⁸⁵ UC, *Response to PIAC questionnaire* (2013)

⁸⁶ UC, *Response to PIAC questionnaire* (2013)

⁸⁷ CCTS, *Response to PIAC questionnaire* (2013)

⁸⁸ CCTS, *Response to PIAC questionnaire* (2013)

⁸⁹ CCTS, *Response to PIAC questionnaire* (2013)

⁹⁰ UC, *Response to PIAC questionnaire* (2013)

⁹¹ UC, *Response to PIAC questionnaire* (2013)

⁹² UC, *Response to PIAC questionnaire* (2013)

noted the development of detailed information regarding their online billing practices in order to ensure customers are well informed.⁹³ When Rogers first initiated the fee for a paper bill, they communicated this change through a phased approach.⁹⁴ Rogers initially implemented the fee for wireless customers, followed by those subscribing to multiple Rogers products.⁹⁵ They expected by September 2013 all customers who subscribe to Rogers cable or Internet products will have either moved to online billing or will be charged a \$2 fee per month for their bill.⁹⁶

During this transition period, Rogers indicated communicating with their various customer segments, encouraging customers to sign up for online billing.⁹⁷ Communications channels employed included bill messages, the Rogers Communications website, through their customer care service, as well as advising customers for 2 months following the start of the paper charge.⁹⁸

As a Result

It appears that a number of consumers have submitted their concern with paying an additional fee to receive a paper bill or statement, although the exact number is impossible to determine. It's interesting to speculate what the number of consumer "inquiries" made would be if they were registered with all provincial consumer protection organizations. That being said, organizations who are collecting such data, such as the CCTS, note the number of official complaints they have received about being charged for a paper bill is growing. Meanwhile, members of the Union des consommateurs noted the difficulty many consumers have obtaining service from governmental authorities through traditional ways of communication. Regional consumer groups also point out the rarity of free paper billing.

In response to consumer concerns, the Union des consommateurs has called for amendments to the Quebec *Consumer Protection Act* (CPA) to prohibit charging extra fees to consumers who receive a paper bill. Given the scope of this issue, it was surprising none of the governmental agencies who responded have developed information materials or guidelines which may assist consumers facing a charge for receiving a paper bill or statement. To their credit, Rogers Communications provided an outline of their phased approach to the implementation of this additional charge to consumers.

⁹³ Rogers Communications Inc, *Response to PIAC questionnaire* (2013)

⁹⁴ Rogers Communications Inc, *Response to PIAC questionnaire* (2013)

⁹⁵ Rogers Communications Inc, *Response to PIAC questionnaire* (2013)

⁹⁶ Rogers Communications Inc, *Response to PIAC questionnaire* (2013)

⁹⁷ Rogers Communications Inc, *Response to PIAC questionnaire* (2013)

⁹⁸ Rogers Communications Inc, *Response to PIAC questionnaire* (2013)

Section 5 – Domestic Law

In the previous section, it was discovered that a number of provincial government agencies failed to register complaints concerning the practice of charging for a paper bill. For some stakeholders, the lack of applicable consumer laws or regulations which could support such a complaint was the reasoning provided for not registering consumer complaints. This prompts the question: are there any existing consumer protection laws or regulations in Canada that apply regarding the application of a fee to receive a bill or statement?

The question of jurisdiction over fees for paper billing would likely depend on the service sectors which charged those fees. The current service sectors – banking and communications – in which some companies or institutions charge fees for paper billing are both regulated at the federal level under section 91(15), and sections 91(29) and 92(10)(a) respectively of *The Constitution Act, 1867*⁹⁹. The CRTC generally regulates the application of the federal law to telecommunications and broadcasting, while the federal Department of Finance (and to some extent the Financial Consumer Agency of Canada) covers regulation under the *Bank Act*¹⁰⁰ and related statutes in the area of financial services. The Department of Transport does the same in the area of transportation.

However, some provinces have also enacted statutes which govern contractual relationships between businesses and consumers, purportedly branching from their jurisdiction over property and civil rights in section 92(13) of the Constitution. Many of these statutes, however, relate only to cell phone service providers. The issue of certain sectors – such as cell phone contracts – which are currently covered by both federal and provincial rules, though potentially problematic, has yet to be formally determined by Canadian courts.

CRTC Wireless Code

The Canadian Radio-television and Telecommunications Commission (CRTC) created the Wireless Code so consumers of retail mobile wireless voice and data services (cell phone services) would better understand consumer rights and service provider obligations. The Wireless Code applies to all new contracts signed as of December 2, 2013. It also applies to existing contracts that are renewed or extended, or where the key terms are amended, as of December 2, 2013.¹⁰¹

⁹⁹ *The Constitution Act, 1867* (U.K.), 30 & 31 Victoria, c. 3.

¹⁰⁰ S.C. 1991, c. 46.

¹⁰¹ Canadian Radio-television and Telecommunications Commission, *The CRTC Wireless Code*, website. Last accessed April 14, 2014 at http://www.crtc.gc.ca/eng/info_sht/t13.htm

Although the issue of paper bill fees did emerge during the proceeding which resulted in the creation of the Wireless Code¹⁰² – a proceeding in which PIAC and other consumer groups argued that wireless service providers should not be permitted to charge paper bill fees – the Code does not specifically reference fees for paper billing.

Part B of the Code stipulates that a service contract must include “rates for optional services selected by the consumer at the time the contract is agreed to.”¹⁰³ “Optional services” are defined as “services that a customer can choose to add to their wireless plan, usually for an additional charge, such as caller ID or call forwarding.”¹⁰⁴ It is unclear whether providing paper bills would be captured under this definition,¹⁰⁵ particularly as paper bill fees tend to be imposed unilaterally by the service provider.

Part D of the Code states that a service provider must not change the key contract terms and conditions of a postpaid wireless contract during the commitment period without the customer’s informed and express consent. When a service provider notifies a customer that it intends to change a key contract term or condition during the commitment period, the customer may refuse the change.¹⁰⁶ By contrast, terms which are not key terms may be changed by the service provider upon 30 days notice.¹⁰⁷

While it could be argued that a fee for a paper copy of an invoice is such a key term, most contracts created since the coming into force of the Wireless Code now have a term related to fees for paper invoices included. Therefore, only a small subset of existing customers, if they have renewed their contract on previous terms or are still under old terms, may be able to challenge the fee on this basis. If the paper bill fee is not a key term, the only requirement of this part would be that the service provider state the rate for paper bills and give 30 days notice of any change to that rate.

¹⁰² See, for instance: Telecom Notice of Consultation CRTC 2012-557, Intervention of the Canadian Wireless Telecommunications Association (4 December 2012) at p. 8 (Appendix A); and Telecom Notice of Consultation CRTC 2012-557, Reply Comments of the Public Interest Advocacy Centre, Consumers’ Association of Canada, and Council of Senior Citizens Organizations of British Columbia (18 December 2012) at paras. 101-109.

¹⁰³ Canadian Radio-television and Telecommunications Commission, *The Wireless Code*, Part B. Last accessed April 2, 2014 at http://www.crtc.gc.ca/eng/info_sht/t14.htm

¹⁰⁴ Canadian Radio-television and Telecommunications Commission, *The Wireless Code*, Part B. Last accessed April 2, 2014 at http://www.crtc.gc.ca/eng/info_sht/t14.htm

¹⁰⁵ However, we note that TELUS and Bell Canada wireless contracts, since the coming into force of the Wireless Code, list the paper bill fee as “Optional Services” in the “Critical Information Summary” sheet which must accompany the contract. Rogers lists the fee as a “month-to-month” services on its Critical Information Summary.

¹⁰⁶ Canadian Radio-television and Telecommunications Commission, *The Wireless Code*, Part D. Last accessed April 2, 2014 at http://www.crtc.gc.ca/eng/info_sht/t14.htm

¹⁰⁷ Canadian Radio-television and Telecommunications Commission, *The Wireless Code*, Part B. Last accessed April 2, 2014, para. 94, at http://www.crtc.gc.ca/eng/info_sht/t14.htm

PIAC and CAC Part 1 Application to the CRTC

As noted in the introduction, the Public Interest Advocacy Centre (PIAC) and Consumers' Association of Canada (CAC) filed an application with the CRTC in October 2013 requesting the elimination of all fees charged by telecommunications service providers for providing bills in paper format. PIAC and CAC sought refunds for "paper bill fees" charged to Primary Exchange Service customers and landline customers in regulated areas. The groups' application also asked the CRTC to prohibit telecommunications companies from charging paper bill fees to any of their customers.¹⁰⁸

PIAC and CAC contended that forcing all telecommunications service customers, regardless of their location or telecommunications service provider (TSP), to incur an additional charge for a printed bill was an unjustly discriminatory practice under section 27(2) of the *Telecommunications Act*.¹⁰⁹ Moreover, they argued this practice was inconsistent with a number of objectives of Canada's telecommunications policy, while the manner in which these charges had been imposed on customers suggested that market forces in this area had been inadequate to protect the interests of consumers.¹¹⁰

Are Paper Bill Fees an unauthorized rate increase?

In a previous decision, Telecom Decision 2006-15, the CRTC set conditions regarding the supply of primary exchange service (PES) by Incumbent Local Exchange Carriers (ILECs) in forborne locations. Forborne locations essentially mean locations where the CRTC does not enforce its full suite of telecom regulations on telecommunication service providers due to a lack of competition. However, in these instances, the CRTC imposed a price ceiling in these areas for residential land-line providers in order to "provide vulnerable and uncontested customers with a safeguard against unreasonable rate increases in a forborne environment."¹¹¹

In their application, PIAC and CAC argued the paper bill fee was a clear increase above the last calculated rate cap as defined in Telecom Decision 2006-15. Therefore, the ILECs who charged paper bill fees to standalone PES customers had exceeded their authorized rate caps, violating the condition set out in Decision 2006-15.¹¹² In legal terms, the service providers in these areas

¹⁰⁸ PIAC, *Application Asks CRTC to Prohibit Paper Bill Fees and Seek Refunds for Regulated Phone Customers*, Media Release. October 23, 2013.

¹⁰⁹ S.C. 1993, c. 38.

¹¹⁰ PIAC, "Application by PIAC and CAC regarding the practice by certain TSPs to charge a fee for paper bills," CRTC Website. Last accessed July 24, 2013 at <https://services.crtc.gc.ca/pub/TransferToWeb/2013/8661-P8-201314012.zip>

¹¹¹ CRTC, Telecom Decision 2006-15 at para. 452

¹¹² PIAC, "Application by PIAC and CAC regarding the practice by certain TSPs to charge a fee for paper bills," CRTC Website. Para, 31. Last accessed July 24, 2013 at <https://services.crtc.gc.ca/pub/TransferToWeb/2013/8661-P8-201314012.zip>

had imposed a new charge without filing it with the CRTC for approval under s. 25 of the *Telecommunications Act*.

Do Paper Bill Fees violate s. 27(2) of the Telecommunications Act?

Sections 27(2) and (4) of the *Telecommunications Act* provide that:

(2) No Canadian carrier shall, in relation to the provision of a telecommunications service or the charging of a rate for it, unjustly discriminate or give an undue or unreasonable preference toward any person, including itself, or subject any person to an undue or unreasonable disadvantage.

...

(4) The burden of establishing before the Commission that any discrimination is not unjust or that any preference or disadvantage is not undue or unreasonable is on the Canadian carrier that discriminates, gives the preference or subjects the person to the disadvantage.

PIAC and CAC argued that imposing a paper billing surcharge constituted unjust discrimination under s. 27(2) of the *Act* because it effectively penalized telecommunications customers who were not subscribed to electronic billing.¹¹³ As revealed in a previous chapter, the surcharge unjustly discriminates against many consumers who may not have access to the Internet or who may not be comfortable using e-billing.¹¹⁴ It is evident that access to electronic billing technology presents significant challenges for many Canadian consumers.

The groups also pointed out that, in addition to the discriminatory nature of this practice, a number of consumers had entered into complex bundled multi-service, multi-year service arrangements offered by several incumbent cable and telephone companies. Consumers subject to these agreements typically did not have the flexibility to consider alternatives to their current PES offering unless they were prepared to incur potentially significant penalties.¹¹⁵ As a result, these bundling arrangements seriously undermined a consumer's ability to migrate from

¹¹³ PIAC, "Application by PIAC and CAC regarding the practice by certain TSPs to charge a fee for paper bills," CRTC Website. Para, 42. Last accessed July 24, 2013 at

<https://services.crtc.gc.ca/pub/TransferToWeb/2013/8661-P8-201314012.zip>

¹¹⁴ PIAC, "Application by PIAC and CAC regarding the practice by certain TSPs to charge a fee for paper bills," CRTC Website. Para, 42. Last accessed July 24, 2013 at

<https://services.crtc.gc.ca/pub/TransferToWeb/2013/8661-P8-201314012.zip>

¹¹⁵ PIAC, "Application by PIAC and CAC regarding the practice by certain TSPs to charge a fee for paper bills," CRTC Website. Para, 44. Last accessed July 24, 2013 at

<https://services.crtc.gc.ca/pub/TransferToWeb/2013/8661-P8-201314012.zip>

one service provider to another even to avoid unilaterally imposed charges such as fees for paper billing.¹¹⁶

PIAC and CAC concluded that paper bill fees essentially shifted a cost of operating a business – providing paper bill statements – from service providers to their customers. In the case of the ILECs in particular, these costs were already being recovered by the service provider through its regulated rates.¹¹⁷ As a result, the groups recommended that the CRTC Wireless Code¹¹⁸ be amended to include a provision prohibiting charges for providing paper bills. They also suggested that all telecommunications service providers be required to provide paper billing (and in alternate formats) at the customer’s choice at no additional charge.

Result of the PIAC/CAC Application

On July 23, 2014, the CRTC announced it would host a private meeting with telecommunications and broadcasting service providers to discuss the practice of charging fees to customers who wish to receive paper bills, rather than rendering a decision on an application filed by PIAC and the CAC, which the Commission purported to “close” without a decision being rendered.¹¹⁹ The meeting would take place August 28, 2014, and would be closed to any other stakeholders, including representatives of Canadian consumers. For a regulatory entity with a strong desire to retain public credibility, it is disappointing the CRTC has chosen to have a closed-door meeting rather than an open and transparent process.¹²⁰ This approach appears to contradict the commitments by the Government of Canada outlined in the last Speech from the Throne and in Budget 2014 that fees for paper billing would be eliminated – not merely discussed or managed.¹²¹

¹¹⁶ PIAC, “Application by PIAC and CAC regarding the practice by certain TSPs to charge a fee for paper bills,” CRTC Website. Para, 43. Last accessed July 24, 2013 at

<https://services.crtc.gc.ca/pub/TransferToWeb/2013/8661-P8-201314012.zip>

¹¹⁷ PIAC, “Application by PIAC and CAC regarding the practice by certain TSPs to charge a fee for paper bills,” CRTC Website. Para, 49. Last accessed July 24, 2013 at

<https://services.crtc.gc.ca/pub/TransferToWeb/2013/8661-P8-201314012.zip>

¹¹⁸ Published in Telecom Regulatory Policy 2013-271.

¹¹⁹ CRTC, *CRTC Challenges Communications Industry to Address Paper Bill Fees*, News Release, July 23, 2014.

¹²⁰ See PIAC and CAC Press Release, “PIAC and Consumers’ Association of Canada Release Open Letter to Chairman of CRTC About Paper Bill Fees” (29 July 2014). Online:
http://www.piac.ca/telecom/piac_and_consumers_association_of_canada_release_open_letter_to_chairman_of_crtc_about_paper_bill_fees/

¹²¹ See PIAC and CAC Press Release “CRTC’s Weak Attempt to Settle Paper Bill Fees with Telcos Disrespects Consumers”, July 23, 2014. Online:
http://www.piac.ca/telecom/crtc_s_weak_attempt_to_settle_paper_bill_fees_with_telcos_disrespects_consumers/

Canadian Provincial Legislation

Apart from the federal law, and aside from the province of Québec, which has a civil law system (referred to below), the remainder of Canada's provinces address consumer issues with the common law, overlaid with general consumer protection laws and in the area of wireless service, recent specific acts. We deal with these sources of potential legal regulation of fees for paper billing below.

Common Law

A consumer invoice or regular bill from a service provider at common law is a statement of "account" and usually is worded as a demand for payment of the debt that is implied by the statement of the account. Usually the service provider (the creditor at common law) provides a period in which it will accept payment of the account without penalty, after which time it may charge interest on the account. A customer (the debtor) is expected to review the account, and if there are any errors, to notify the service provider so that they can agree on the account. Once the parties agree on the account, either by tacit acceptance or by agreement upon review by the customer, a debt is owed to the creditor, who then may bring a debt action in court to recover the debt.

Overlaid on this creditor-debtor relationship is the common law of contract, which governs the interpretation and enforcement of the contract the customer and service provider sign to deliver the service. Certain contractual obligations between the parties can arise either explicitly (as they are in the actual words of the contract¹²²) or implicitly (as the common law implies contractual and sometimes even tort duties) given the type and subject matter of contract, status and relationship of the parties, public policy and other matters. One of the implied obligations of a consumer service contract is that the customer will pay the periodically due invoices sent by the service provider. However, the common law does not appear to have developed an implicit duty on the service provider to send a bill, let alone to do so at no cost to the customer. Why?

Practically speaking, debt collection for consumer services almost never proceeds to a common law court (even small claims courts) for decision, either on creditor-debtor law or contractual law. Rather, primary creditors attempt to collect the debt and then sell the debt after a period, at a discount, to collection agencies. In addition, unless the creditor sends an invoice to the debtor periodically, the creditor risks not getting paid and indeed, if the debtor does not acknowledge the debt in a given period, the creditor may have its claim barred by a statute of limitations. These factors help explain why no caselaw in common law jurisdictions has developed requiring

¹²² And indeed, it is the fact that service providers, such as telecom companies in Canada, put specific wording into their contracts requiring the customer to pay a fee for receiving a paper bill. Thus there is an explicit contractual obligation to pay for a paper copy of the bill.

creditors to send invoices and thus, no caselaw is in existence (that PIAC was able to locate on a diligent search) that discusses the format of an invoice or whether the creditor may separately charge a fee for delivering an invoice or statement of account.

This means that consumers cannot look to common law remedies, outside of unconscionable or illegal contracts, for any legal guidance on the question of whether a service provider can charge them for a paper bill.

Usually in Canada, when a consumer problem manifests itself in situations where the common law does not provide an adequate remedy, a provincial government will attempt to remedy the situation by passing a statutory rule, usually in its consumer protection legislation (relying on the provincial jurisdiction over property and civil rights in the province – which includes private contracts).

General Provincial Consumer Protection Laws and Wireless Services Acts

Although all provinces have general consumer protection laws overlaid on the common law, most have not addressed the process of billing a customer outside of provisions requiring a consumer to be given a copy of the contract.¹²³ We have not, therefore, generally summarized such general provincial consumer protection laws (with brief mentions of the Ontario and Québec statutes, below), as their application likely would have no effect on the question of paying for paper bills.

However, a number of provinces recently have enacted additions to their consumer protection statutes, either as a standalone act or as an amendment to their specific provincial consumer protection acts.

Several provinces have made changes to their consumer protection regimes to address cellphone contracts.¹²⁴ Some provinces have addressed the issue of paying for paper billing, but no jurisdiction has banned the practice. All provinces appear to allow fees for paper billing, provided that the fee is disclosed to the consumer before signing the contract.

¹²³ See, for example, s. 22 of the *Consumer Protection Act, 2002*, S.O. 2002, c. 30, Sched. A., which reads:

22. Every future performance agreement shall be in writing, shall be delivered to the consumer and shall be made in accordance with the prescribed requirements. 2002, c. 30, Sched. A, s. 22.

¹²⁴ It should be noted that the jurisdiction of the provinces to enact their wireless services (cellphone) acts is questionable, in that telecommunications is an exclusively federal area. For PIAC/CAC/COSCO's view on this question see their Final Written Comments (March 1, 2013) in the proceeding leading to the Wireless Code, at paras. 13-41 and the legal opinion filed at Appendix B of that submission. Online: <https://services.crtc.gc.ca/pub/DocWebBroker/OpenDocument.aspx?DMID=1867506>

Ontario

In April 2014, the Ontario government enacted the *Wireless Services Agreement Act*¹²⁵. For the most part, the *Wireless Services Agreement Act* is comparable to CRTC's *Wireless Code* as it applies to billing practices and service contracts. Section 10(1)(15), however, specifically references paper billing by stating that a contract must be in writing and must disclose:

10.(1)

...

15. The terms and methods of payments payable by the consumer under the agreement, including,

- i. the currency in which amounts are expressed, if not in Canadian currency, and
- ii. any charges for choosing paper or other formats for bills.¹²⁶

Therefore, the Ontario *Wireless Services Agreement Act* appears to only require disclosure of any fees or charges for paper billing. It does not prohibit the practice of charging nor provide the consumer with free access to paper format upon request.

The Ontario *Consumer Protection Act, 2002*¹²⁷ also contains provisions which specify the types of information that must be provided in a contract,¹²⁸ bars misleading statement and unconscionable representations,¹²⁹ and prohibits charging consumers for assisting them to obtain anything that the consumer is entitled to, unless the customer agrees to the charge.¹³⁰ It would have to, however, be determined whether a cellphone contract would be considered a "future performance agreement," "remote agreement" or any other type of consumer agreement covered by these provisions of the *Consumer Protection Act, 2002*. Even if so, it is still uncertain as to whether an argument could be made that a paper bill fee was in some way an "unfair practice" or "unconscionable representation",¹³¹ or that it was a "benefit, right or protection to which the consumer is entitled under this Act".¹³² This argument would be a very difficult one to make on the present wording of general consumer protection legislation in Ontario.

¹²⁵ *Wireless Services Agreement Act, 2013*, S.O. 2013, c. 8.

¹²⁶ *Ibid.*, s. 10(1)(15).

¹²⁷ S.O. 2002, c. 30, Sched. A.

¹²⁸ *Ontario Regulation 17/05, Consumer Protection Act, 2002*, s. 24.

¹²⁹ *Consumer Protection Act, 2002*, S.O. 2002, c. 30, Sched. A., ss. 14-15.

¹³⁰ *Consumer Protection Act, 2002*, S.O. 2002, c. 30, Sched. A., s. 12.

¹³¹ See ss. 14 and 15 of the *Consumer Protection Act, 2002*. The Act seeks to generally control behaviour in this section through controlling "representations", not directly regulating contractual requirements.

¹³² There are two instances under the *Consumer Protection Act, 2002* where a supplier must give a customer an "invoice": repairmen (including car repairs) (s. 62); or a "credit supplier" that is not a payday lender (s. 67(1)). Although in both cases the Lieutenant-Governor in Council may make regulations stipulating the prescriber information and form of such invoices, the regulations only specify that the invoice be "in writing" not whether that writing be on paper or electronic. Given the definition of "writing" found, for example in the Federal *Interpretation*

Québec

Québec, in 2009, was the first province to enact legislation which specifically related to cellphone contracts.¹³³ The amended *Consumer Protection Act* introduced new rules, including provisions on information that a contract must disclose,¹³⁴ the termination of a contract,¹³⁵ and the renewal of a contract.¹³⁶

However, no provision of the “Distance Contracts” division of the Québec *Consumer Protection Act* (which is the part that notionally covers cellphone service) discusses fees charged for paper billing. Likewise, there is no provision in the *Civil Code of Québec* which explicitly prohibits charging a customer for the provision of a paper invoice or bill, provided the charge is detailed in the contract. While consumer contracts in communications services are undoubtedly considered “adhesion contracts” under the *Civil Code*, no provision that is specific to adhesion or consumer contracts specifically requires that a paper bill be provided or that a consumer be able to access a statement of their account free.

Intriguingly, in December 2013, during a revision of the *Consumer Protection Act*, it was proposed that fees for paper invoices be prohibited by the Act.¹³⁷ However, since the change of provincial government in Québec, the future of this idea is unknown.

Act, R.S.C., 1985, c. I-21, s. 35, which defines writing as “words printed, typewritten, painted, engraved, lithographed, photographed or represented or reproduced by any mode of representing or reproducing words in visible form” and given the present pervasiveness of electronic communications, it would be hard to argue that the sole criterion of “in writing” would mean “on paper”. Even were such a requirement to be passed, any new legislation would have to continue and add “without charge” to address the issue of pay to pay policies.

¹³³ See: *Consumer Protection Act*, C.Q.L.R. c. P-40.1.

¹³⁴ *Ibid.*, s. 214.2

¹³⁵ *Ibid.*, ss. 214.6-214.8; and

Regulation Respecting the Application of the Consumer Protection Act, C.Q.L.R. c. P-40.1, r. 3, ss. 79.10-79.11.

¹³⁶ *Consumer Protection Act*, C.Q.L.R. c. P-40.1, ss. 214.3-214.4.

¹³⁷ See Office de la protection du consommateur, “PHASE IV DE LA RÉVISION LÉGISLATIVE - PREMIÈRE CONSULTATION - MODIFICATIONS ENVISAGÉES AUX LOIS SOUS LA SURVEILLANCE DE L’OFFICE DE LA PROTECTION DU CONSOMMATEUR” (8 novembre 2013) online <http://www.opc.gouv.qc.ca/fileadmin/media/documents/a-propos/ConsultationPhase4.pdf>, p. 23, item 33 and to some extent item 34.

Manitoba

In September 2012, Manitoba introduced the *Consumer Protection Act Amendment Act (Cell Phone Contracts)*.¹³⁸ It amended the *Consumer Protection Act*¹³⁹ by bringing in various provisions related to cell phone contracts, including requirements to fully disclose and explain charges for “optional services.”¹⁴⁰ Section 205 of the Act specifically addresses paper billing by stating that a supplier must, at the customer’s request, “provide bills in paper form to the customer”:

205. A supplier must, at the customer's request and subject to the regulations, provide bills in paper form to the customer.

Moreover, the Manitoban government can impose an administrative penalty on companies that do not comply with this provision. Section 15(1)(w) of the *Cell Phone Contracts Regulation*¹⁴¹ states that:

15(1) A notice of administrative penalty may be issued under subsection 136(1) of the Act if a person fails to comply with any of the following provisions of Part XXII (Contracts for Cell Phone Services):

...

(w) section 205 (paper bills at customer's request).

However, Manitoba legislation does not specifically prohibit charging fees for paper billing.

Nova Scotia

Nova Scotia, in 2012, also enacted legislation governing cellular telephone contracts, now enshrined in its *Consumer Protection Act*.¹⁴² With regards to paper billing, section 25AJ of the Act states that a supplier shall, at the customer’s request, provide the customer with a paper bill:

25AJ A supplier shall, at the customer's request and subject to the regulations, provide bills in paper form to the customer.

Although the Act allows the provincial government to make regulations concerning paper bills, the current regulations only relate to the provision of electronic documents, including the

¹³⁸ S.M. 2011, c. 25. Last accessed April 10, 2014 at <https://web2.gov.mb.ca/laws/statutes/2011/c02511e.php>.

¹³⁹ C.C.S.M. c. C200.

¹⁴⁰ *Ibid.*, s. 185(1)(i).

¹⁴¹ *Cell Phone Contracts Regulation*, Regulation 40/2012.

¹⁴² R.S.N.S. 1989, c. 92.

requirement to ensure that any electronic document allows a typical customer to “readily... print a copy.”¹⁴³

Otherwise, no provision discusses charges for paper billing.

Newfoundland and Labrador

In 2012, the government of Newfoundland and Labrador amended the *Consumer Protection and Business Practices Act*¹⁴⁴ in order to introduce rules related to cell phone contracts. Similar to the Ontario legislation, section 35.2(1)(y) requires suppliers to disclose to a customer any “fee charged for paper invoices”:

35.2 (1) A supplier shall disclose the following information to a consumer:

...

(y) the fee charged for paper invoices and detailed account statements;

However, the Act does not prohibit the practice of charging customers for paper billing nor provide any customer any right to a free copy of their statement.

Conclusions

Our present review has found that no Canadian federal legislation or regulator, nor provincial legislation currently prohibits fees or charges for paper billing. While some provincial statutes mandate disclosure of these types of fees to customers, none specifically addresses the legality of imposing fees for paper bills, and others do not discuss the provision of paper bills at all.

The absence of any legal avenue of recourse is problematic for consumers, particularly for those who are disproportionately affected by monthly paper bill fees – for, likely, multiple services – and particularly for those who have no choice but to accept these fees for various reasons, including lack of access to the Internet or the absence of skills needed to effectively use online billing.

The clearest and most efficient solution would be to create legislation or regulations which specifically addressed practices of charging for paper bills by, for instance, prohibiting these fees. This would not only establish clear rules to govern these practices but would allow specific public or regulatory institutions to actually enforce those rules, opening up direct options of recourse for consumers.

¹⁴³ *Cellular Telephone Contracts Regulations*, N.S. Reg. 36/2013, s. 3(b).

¹⁴⁴ S.N.L. 2009, c. C-31.1.

Section 6 – International Approaches to Paying for Paper Bills

The challenge of how consumer interests and business needs may be met in creating national policies on paper billing have been considered by national governments in a number of countries around the world. Furthermore, there are guidelines present in arenas beyond provincial and federal jurisdiction, such as the International Organization for Standardization that may be applicable to the practice being examined.

In the countries we review below, consumer-oriented studies have been conducted by governmental bodies and businesses in order to determine a broad set of governance policies. These studies often consider current business, competition and regulatory protections for consumers, and whether paper billing by utility and service providers adheres to national standards. The results of these actions have been mixed: while in some nations the protections provided consumers against paying for paper billing are extensive, still other regimes lack the regulatory or policy standards to limit the costs of bills to citizens.

Clearly the breadth and strength of general national laws and policies providing consumer protection are essential to create a basis for limiting or eliminating the charges applied by companies to paper bills. Few of the surveyed countries have created unique stand-alone legislation in this area. Below the policies and findings of national studies will be discussed.

United Kingdom

Similar to Canada, it is common for telecommunications companies to require a fee in exchange for producing a paper bill for a client. From 2010 to 2012, the UK telecom regulator Ofcom received 241 complaints about charges for paper billing.¹⁴⁵ These included 16 from businesses and 225 from individuals.¹⁴⁶ With a number of complaints about fees for paper bills, Ofcom decided to study the advisability and legality of these charges.

In 2008, Ofcom reported through its *Ofcom review of additional charges* that only broadband providers were charging an additional fee for sending paper bills to customers.¹⁴⁷ Such a fee policy is similar to that found among some providers in Canada where non-broadband subscribers are not charged fees for paper bills. Yet, some exceptions for customers are applied to the application of the fee. For example, among those customers under legacy contracts for broadband services many were not charged a fee because they received a paper bill. Fees for

¹⁴⁵ Letter to J. Bishop, Ofcom Request for Information, 9 July 2013, Reference 1-237085707.

¹⁴⁶ Letter to J. Bishop, Ofcom Request for Information, 9 July 2013, Reference 1-237085707.

¹⁴⁷ Ofcom, *Ofcom review of additional charges – Including non-direct debit charges and early termination charges, Statement*, 19 December 2008, at p. 119.

paper bills ranged from £0.50 to £1.50 per month. The authors also note that this practice is increasing in frequency among service providers at the time the report was written.¹⁴⁸

In examining what might be done about fees, Ofcom provided guidance to companies as to how information must be presented to consumers regarding paper bill fees:

- Contract terms and other marketing materials must make clear to customers separate billing options with different charges;
- Billing option information must be clear along with the pricing of each option;
- Where there are different types of billing information which incur different fees, contract terms must clearly set these out;
- These terms must be set out in a manner so that a consumer who chooses itemized billing would understand this as part of the services that are purchased under the contract. The fee is therefore presented as part of a package of goods;
- Fees are capped at £1.50 per month; and
- If the contractual and marketing terms above are not followed by a telecom provider, then further duties may apply to the provision of fees for bills¹⁴⁹

If terms and billing practice information is not presented in clear and transparent terms, then regulators may apply a fairness test to assess whether the charges applied are too high. In such circumstances, companies issuing bills may be asked to show that the fee charged of the customer is directly linked to the costs of producing the paper bill (e.g., costs of paper, ink, postage, etc.).¹⁵⁰

As noted previously, studies recently conducted by consumer groups in the UK note those who prefer to receive their bills by traditional paper methods are typically paying £276 a year or more than those households who do not receive their bills in this manner. This figure is across all services including telecommunications and utilities.¹⁵¹ Consumer group *Which?* found that these

¹⁴⁸ Ofcom, *Ofcom review of additional charges – Including non-direct debit charges and early termination charges, Statement*, 19 December 2008, at p. 119.

¹⁴⁹ Ofcom, *Ofcom review of additional charges – Including non-direct debit charges and early termination charges, Statement*, 19 December 2008, at p. 124-125.

¹⁵⁰ Ofcom, *Unfair Terms in Consumer Contracts Regulations 1999*, p. 21-22.

¹⁵¹ Sean Poulter, "The £276 cost of not paying bills online: How 5 million pensioners are being punished for sticking with paper," *The Daily Mail* (24 August 2013).

fees can include up to £67.08 on mobile phone bills, £81 on broadband services and £128 on gas and electricity.¹⁵²

In addition, representatives of charities, interest groups and businesses have joined together to launch the “Keep Me Posted” campaign.¹⁵³ The group believes that it is every consumer’s right to choose, without disadvantage, how financial institutions, utility companies, media companies and other service providers contact them. Keep Me Posted believes that the restricted access to paper bills and statements unfairly limits consumer choice and disadvantages those who do not have access to the Internet.

In response to the launch of Keep Me Posted, the House of Lords tabled the following Early Day Motion on October 10, 2013:

That this House believes all consumers should have the right to choose how they receive bills and statements and not be subject to any form of penalty for preferring to receive this information on paper rather than a digital format; notes that many consumers who do not have access to the internet or basic digital skills are unfairly disadvantaged by organisations that do not offer them this choice; and supports the Keep Me Posted campaign which champions the principle that companies and other organisations should continue to offer consumers the right to choose without penalty how they receive information.¹⁵⁴

To date, 78 of the 92 members of the House of Lords have supported the motion. It does not appear as though the House of Commons has responded to the motion or addressed the issue of paper billing.

Australia

Payment for paper bills is common practice among many Australian telecom¹⁵⁵ companies. This has caused telecommunication operators in Australia to consider the impact of these policies on their customers. Telstra, for example, developed their *Environmental Impact of Online Billing Compared with Paper Billing: Life Cycle Assessment Summary Report* (Billing Report). This

¹⁵² Sean Poulter, “The £276 cost of not paying bills online: How 5 million pensioners are being punished for sticking with paper,” The Daily Mail (24 August 2013).

¹⁵³ “Keep me Posted: A Consumer’s Right to Choose,” <<http://www.keepmeposteduk.com/>> (accessed on March 7, 2014).

¹⁵⁴ Early Day Motion 554, introduced 10 October 2013; debated 15 November 2013.

¹⁵⁵ For example see Vodafone Australia’s policy: <http://www.vodafone.com.au/help/account/billexplainer> .

report created a life cycle analytical approach using ISO Standard 14040 to investigate the total environmental impact of moving to online billing from paper billing.¹⁵⁶

Telstra's most significant finding in its Billing Report was that 70% of its customers needed to receive bills online for any environmental benefits to be gained.¹⁵⁷ This figure was arrived at by factoring in not only the number of paper bills that might otherwise be produced, but also considering how this might be offset by the energy required to produce online bills.¹⁵⁸ This required customer base for online billing could be diminished, however, if customers were printing online bills at home which the study found that up to 95% of consumers were doing at the time of the writing of the Billing Report.¹⁵⁹

While such findings did not necessarily engender a reduction in the practice of charging for paper bills in Australia, it is important to see that such assessments were completed by companies. Such studies show the total environmental impact, not simply a reduction in paper output, can be affected by a move to payment for paper bills.

Ireland

Ireland presents one of the strongest examples of regulatory and policy oversight by a national body over billing practices among telecommunications companies. A 2013 Response to Consultation and Decision (the Decision) by the Commission for Communications Regulation, *Consumer Bills and Billing Mediums: Consumer protection amendments to the General Authorisation*, outlines the approach of the Irish government to payments for paper billing options.¹⁶⁰

Most importantly to its Decision is the principled approach of Ireland to billing. This includes the requirement that every communications service provider issues a bill which customers of post paid services are able to both access and is free of charge.¹⁶¹ The Decision states:

¹⁵⁶ Telestra, *Environmental Impact of Online Billing Compared with Paper Billing: Life Cycle Assessment Summary Report*, December 2008, at p. 2.

¹⁵⁷ Telestra, *Environmental Impact of Online Billing Compared with Paper Billing: Life Cycle Assessment Summary Report*, December 2008, p. 3.

¹⁵⁸ Telestra, *Environmental Impact of Online Billing Compared with Paper Billing: Life Cycle Assessment Summary Report*, December 2008, p. 3.

¹⁵⁹ Telestra, *Environmental Impact of Online Billing Compared with Paper Billing: Life Cycle Assessment Summary Report*, December 2008, p. 3.

¹⁶⁰ Commission of Communications Regulation, *Consumer Bills and Billing Mediums: Consumer protection amendments to the General Authorisation*, ComReg 13/52, D08/13, 6 June 2013.

¹⁶¹ Commission of Communications Regulation, *Consumer Bills and Billing Mediums: Consumer protection amendments to the General Authorisation*, ComReg 13/52, D08/13, 6 June 2013, para. 5.

“ComReg is introducing conditions in relation to billing mediums for post-paid customers. These requirements, allow and facilitate the use of alternative billing mediums (such as e-billing), while ensuring that customers who are unable to access a bill by way of an alternative billing medium will, (once they inform their provider), be allowed to receive a paper bill free of charge.”¹⁶²

Significant to this proposal was that service providers must verify customers can access and use online bills before issuing these, and that if online bills are not accessible than paper bills must be provided free of charge.¹⁶³ Pre-paid customers of communications providers are also entitled to request details of their transactions from their service provider free of charge.¹⁶⁴ Generally these rules were arrived at because of a finding by ComReg that: “charging customers to access a bill would not be in the interests of consumers.”¹⁶⁵

ComReg's consultation process which led to its Decision included responses from many of the major telecommunications providers as well as other organizations including consumer groups, groups concerned with those with disability access to services and other interested parties. The consumer protection rules associated with relevant national and European Communities legislation provided ComReg with the authority to create such protections.¹⁶⁶ While similar consumer protections exist amongst all countries of the European Communities, such as the UK, Ireland stands out in its willingness to use EC law along with national consumer protection laws against payment for paper bills. These rules apply to all consumers, and are not tied to a universal service obligation.¹⁶⁷

ISO Network Services Billing Standard 14452

A review of federal regulatory rules, provincial legislation, and jurisprudence have revealed an apparent reluctance on the part of provincial and federal policymakers to address the issue of paying a fee to provide a paper bill or statement. One could reasonably conclude from the evidence provided that as long as the application of the fee is not hidden from the consumer when they sign a contract, service providers can continue the practice of applying a fee for a

¹⁶² Commission of Communications Regulation, *Consumer Bills and Billing Mediums: Consumer protection amendments to the General Authorisation*, ComReg 13/52, D08/13, 6 June 2013, para. 5.

¹⁶³ Commission of Communications Regulation, *Consumer Bills and Billing Mediums: Consumer protection amendments to the General Authorisation*, ComReg 13/52, D08/13, 6 June 2013, para. 32.

¹⁶⁴ Commission of Communications Regulation, *Consumer Bills and Billing Mediums: Consumer protection amendments to the General Authorisation*, ComReg 13/52, D08/13, 6 June 2013, para. 5.

¹⁶⁵ Commission of Communications Regulation, *Consumer Bills and Billing Mediums: Consumer protection amendments to the General Authorisation*, ComReg 13/52, D08/13, 6 June 2013, para. 43.

¹⁶⁶ Commission of Communications Regulation, *Consumer Bills and Billing Mediums: Consumer protection amendments to the General Authorisation*, ComReg 13/52, D08/13, 6 June 2013, para. 17.

¹⁶⁷ Commission of Communications Regulation, *Consumer Bills and Billing Mediums: Consumer protection amendments to the General Authorisation*, ComReg 13/52, D08/13, 6 June 2013, para. 17.

paper bill or statement. As a result, an inspection of external bodies could be useful to uncover the parameters under which service providers can continue these practices in Canada.

Founded in 1947, the International Organization for Standardization (ISO) is the world's largest developer of voluntary International Standards, having published more than 19 500 International Standards covering almost all aspects of technology and business.¹⁶⁸ International Standards give state of the art specifications for products, services and good practice, helping to make industry more efficient and effective. Developed through global consensus, they help to break down barriers to international trade.¹⁶⁹

The purpose of ISO's network services billing standard ("ISO 14452") is to provide a way for businesses to deal with the concerns of customers about billing practices of utility network service providers.¹⁷⁰ ISO 14452 provides a tool for suppliers of utility services to ensure that their processes enable customers to be provided with clearly comprehensible, accurate, timely and complete bills and have access to sufficient billing related information to enable them to verify the accuracy of billed charges. ISO 14452 is aimed at utility bills which include an element of metered or measured consumption. Many of the key principles in this standard, however, apply to all forms of billing. With respect to paper billing, ISO 14452 does not prohibit the practice, but states that companies must be transparent about the fee associated with providing them.

The intent of ISO 14452 is to:

- Define the minimum requirements for the billing and payment collection processes
- Prevent or reduce complaints by addressing issues that have been the source of frequent complaints
- Ensure that suppliers deal with customers on billing matters in an appropriate and consistent manner
- Provide a fairer basis for an ongoing relationship between utilities and customers
- Provide benchmarks for the level of customer expectations
- Allow for the implementation of smart metering technology and the provision of improved information to customers
- Offer scope for innovation in billing which will enable suppliers to differentiate their services to customers in a competitive market.¹⁷¹

¹⁶⁸International Organization for Standardization, *About ISO*, Website. Last accessed April 3, 2014, at <http://www.iso.org/iso/home/about.htm>

¹⁶⁹International Organization for Standardization, *About ISO*, Website. Last accessed April 3, 2014, at <http://www.iso.org/iso/home/about.htm>

¹⁷⁰ International Standard ISO / DIS 14452:2012, *Network services billing*, 8 August 2012.

¹⁷¹ International Standard ISO / DIS 14452:2012, *Network services billing*, 8 August 2012, p 1.

Scope

ISO 14452 covers the processes required to produce a bill and to deal with issues that arise after the bill has been sent, as well as the content of the billing document. It covers “utility network services” which includes the category “communication.”¹⁷² It applies to all bills or statements for utility network services where there is an ongoing account relationship between the customer and supplier, regardless of the payment method used. This includes bills where a flat rate fee is charged regardless of consumption (e.g. telephony or Internet bills where the tariff allows unlimited usage).

Paper Billing

ISO 14452 applies to invoices issued in paper or electronic form. A “billing option” is a billing related feature, usually at no charge, which a customer may choose (i.e. billing frequency).¹⁷³ A “billing product” is an enhanced billing related offering, usually subject to a fee, to a customer or group of customers.¹⁷⁴ While ISO 14452 does not discourage charging for paper bills, it does require that a supplier shall supply customers at the outset with clear details of any additional changes associated with specific billing or payment options.¹⁷⁵ The billing document shall be delivered to the customer in either paper format, or, as agreed between the supplier and customer.

As a Result

As we have seen, consumer-oriented studies have been conducted by governmental agencies and businesses related to the practice of paying for a paper bill. These inquiries attempted to determine whether paper billing by utility and service providers adheres to national standards. Upon further review, it was found the protections provided to consumers against paying for paper billing were dependent upon your location. While some jurisdictions offer consumers extensive protection, others lack the regulatory or policy standards to limit the costs of bills to citizens. In addition, we concluded the International Organization for Standardization network services billing standard (“ISO 14452”) allows the practice of charging fees for a paper bill as long as companies are transparent about the fee associated with providing them.

In the United Kingdom, for example, the telecommunications regulator studied the legality of applying a fee for a paper bill as part of a larger study in 2008. As a result of this review, it

¹⁷² International Standard ISO / DIS 14452:2012, *Network services billing*, 8 August 2012, s 1.

¹⁷³ International Standard ISO / DIS 14452:2012, *Network services billing*, 8 August 2012, s 2, 10.1

¹⁷⁴ International Standard ISO / DIS 14452:2012, *Network services billing*, 8 August 2012, s 2,12.

¹⁷⁵ International Standard ISO / DIS 14452:2012, *Network services billing*, 8 August 2012, s 3.1.4(f).

advised service providers that fees for this practice were capped at £1.50 per month. Moreover, if terms and billing practice information are not presented in clear and transparent terms, regulators may apply a fairness test to assess whether the charges applied are too high. This may consist of service providers providing evidence the fee charged to customers can be linked directly to the cost of producing the paper bill.

It was found that Australian service providers also charged their customers for the provision of a paper bill. However, unlike any evidence produced in Canada, an Australian telecommunication provider, Telstra, publicly released a report applying an ISO Standard to determine the total environmental impact of moving to online billing from paper billing. It was also interesting to note the study determined 95% of Australians consumers were printing online bills at home at the time of the study.

In a departure from other jurisdictions reviewed, Ireland presents a case study where communications providers distribute bills and statements free of charge, regardless of the format. Moreover, service providers must verify customers can access and use online bills before they are issued. The possibility was noted that consumer protections existing in Ireland could be applied to citizens of any member of the European Communities if member nations chose to implement similar measures.

Section 7 – Conclusions and Recommendations

In the introduction of this investigation, it was assumed that consumers believed they paid for the provision of a paper bill when they agreed to purchase the good or service – it was simply part of the price. This assumption has now been permanently undermined, given the number of service providers that charge consumers an additional fee to continue to receive a monthly bill or statement by mail. For many consumers, the prospect of paying for a monthly bill or statement in paper format was not something they agreed to when acquiring service. As a result, it is difficult to generate sympathy for those service providers who decided to impose fees for paper bills and statements, rather than provide consumers an incentive to switch their preferred method of receiving a bill.

The view was also expressed here that billing is an essential part of the contractual relationship between a service provider and consumers. It is the means by which a service provider reaffirms its service responsibilities to a customer and a customer clearly understands their financial obligations to the service provider. Therefore, the ability of a customer to access, understand, and act upon their billing statement is critical. Thus, it is surprising that more Canadian service providers have not offered consumers an incentive to switch their method of bill provision. It is clear that a sentiment of frustration is present among Canadian consumers regarding the introduction of fees to receive a paper bill or statement. In fact, the Government of Canada has indicated on two separate occasions they intend to take measures in an attempt to end this practice. In the most recent Speech from the Throne, delivered by Governor General David Johnston on October 16, 2013, he stated the government's intention to "End "pay to pay" policies, so customers won't pay extra to receive paper bills."¹⁷⁶ This was reaffirmed by the Minister of Finance in his remarks introducing Budget 2014 on February 11, 2014, when he committed the Government of Canada to "Prohibit the pay-to-pay practice that charges consumers for paper bills—including printed credit card statements."¹⁷⁷

One of the concerns raised by this investigation is that a significant proportion of the population is now forced to pay the extra fees to receive a paper bill or statement due to not using a computer, not having internet access or not being able to afford internet access. It is estimated here that paying for a paper bill or statement cost those Canadians between \$77 and \$102 million per year. We also found evidence paper bill fees appear to disproportionately and negatively penalize lower income consumers, including seniors. Moreover, if just 1 in 10 Canadians that have internet access were added to this group by choosing to receive paper bills

¹⁷⁶ Johnston, D, Governor General of Canada, *Speech from the Throne to Open the Second Session of the Forty-First Parliament of Canada*, October 16, 2013, page 12. Last accessed April 7, 2014 at http://speech.gc.ca/sites/sft/files/SFT-EN_2013_c.pdf

¹⁷⁷ Finance Canada, *The Budget Speech*. Budget 2014 Website, February 11, 2014. Last accessed April 7, 2014 at <http://www.budget.gc.ca/2014/docs/speech-discours/2014-02-11-eng.html>

and statements, we estimated the total cost to all consumers receiving paper bills and statements is between \$215 and \$312 million annually. If 3 in 10 Canadian consumers with internet access pay to receive paper bills and statements, we estimate the total cost to all consumers receiving paper bills and statements is between \$495 million and \$734 million annually. All of these estimated figures would be subject to applicable sales taxes. All for a bill or statement that was largely provided for as part of service provision in Canada prior to 2010.

During this study we were able to collect the views of consumers through the analysis of a telephone survey. One-third of consumers indicated they were not comfortable with receiving bills or statements online, citing a variety of concerns. Moreover, 74% of Canadians surveyed disapproved of the practice of charging people extra for a paper bill or statement, while 71% approved of offering consumers a discount to those who opt for electronic billing. Finally, more than 8 of 10 respondents believe receiving a paper bill in the mail without having to pay an extra fee is part of the company's cost of doing business.

This review revealed consumers may have expressed concern to provincial consumer affairs ministries with paying an additional fee to receive a paper bill or statement. However, the exact number of concerned Canadians is unknown, since a number of ministries failed to register "inquiries" on matters relating to this practice. Within the telecommunications sector, the CCTS indicates the number of official complaints they have received about being charged for a paper bill is growing.

The CRTC's Wireless Code makes no specific mention of the practice of applying an extra fee to receive a paper bill or statement. While some provinces have made recent changes to their consumer protection regimes directly addressing wireless service contract issues, no jurisdiction has banned the practice of paying for paper bill. The absence of any legal avenue of recourse is problematic for consumers, especially those disproportionately affected by monthly paper bill fees for various reasons, including lack of access to the Internet or the absence of skills needed to effectively use online billing. The most efficient solution would be to create legislation or regulations specifically addressing the practice of charging for paper bills by, for instance, prohibiting these fees. This would not only establish clear rules to govern these practices but would allow specific public or regulatory institutions to actually enforce those rules, opening up direct options of recourse for consumers.

Outside of Canada, we found some jurisdictions offer consumers extensive protection while others appear to lack the regulatory or policy standards to limit the costs of bills to citizens. In Ireland, for example, communication service providers distribute bills free of charge and must verify customers can access and use online bills before they are issued. The United Kingdom's telecom regulator has capped fees charged by communication providers for paper bills at £1.50 per month. Moreover, the regulator may apply a fairness test to determine whether the charges applied to consumers are appropriate. The ISO network services billing standard allows the

practice of charging fees for a paper bill as long as companies are transparent about the fee associated with providing them.

Recommendations

As a result of this investigation, and based on the collection of evidence obtained to produce this report, PIAC makes the following recommendations:

Eliminate Fees for Paper Billing

That the Government of Canada follows through on its commitment to eliminate the application of additional fees charged to Canadian consumers to receive a paper bill or statement. The efforts should apply to all service providers that engage in this practice.

Refund Primary Exchange Service customers and landline customers in regulated areas

As per the application filed by PIAC with the Canadian Radio-television and Telecommunications Commission (CRTC), all fees charged by telecommunications service providers for providing bills in paper format be refunded to Primary Exchange Service customers and landline customers in regulated areas.

Provide an Incentive to Switch to Electronic Billing

Suggest service providers in Canada provide a modest discount to encourage customers to choose electronic billing.

Provinces Should Investigate Pay-to-Pay Practices

Recommend provincial government agencies and departments responsible for consumer protection investigate and record consumer complaints regarding the application of fees to receive paper bills and statements.

Provinces Can Eliminate the Spread of Pay to Pay Practices

Recommend provincial governments amend consumer protection laws to eliminate the application of fees to receive paper bills and statements.

Appendix A - CRTC Response from Landline Providers and Wireless Providers Regarding Payment to Obtain a Paper Statement

CRTC Response from Landline Providers

Companies	Wireline		Additional Notes
	Policy	Fee	
Telephone Milot Inc.	No charge; where e-billing is agreed to by consumers there is a rebate	Rebate of \$3 (one time offer)	
Shaw	No charge; if customer switches to e-billing then offer incentives such as one time Pay-Per-View credit of \$5	Rebate/Incentive of \$5	Shaw Direct (DTH) who subscribe to Digital Favourites + Premium Movies Packages who have e-billing + pre-auth payments get a \$4 rebate monthly
Sasktel	No charge	No	Indicate the importance of ecommerce & ebills for social and environmental purposes
Telus	Yes for customers subscribing to any internet service (alone or in combo with others) Incentives given on a promotional basis	\$2; incentives of \$5 (appears to be one-time) and \$2 donation to Tree Canada	<ul style="list-style-type: none"> Internet customers are the target as they have the ability to access the internet, and therefore see e-bills Wireline customers with bills in alternative formats exempt Wireline exemptions for those “non-active” internet users – this is discretionary
WIND (Yak)	Yes for new customers (undefined) for detailed bills	\$1.95	<ul style="list-style-type: none"> No bills available for pre-paid customers Wireline exemptions for seniors or those with special needs WIND – 0.006% of customer base receive paper bills
Indep Telecom PA	No = CityWest, Cochrane, Gosfield, Mornington, North Frontenac, Ontera, Quadro, Tuckersmith, Wightman Yes = all others	Fees not disclosed (use s 39 of the Act)	
Rogers	Yes	\$2	<ul style="list-style-type: none"> Charge for all services (cable, VOIP, BBD, wireless) as of September 2013 Waived for those without internet access, alternative formats and “exceptional circumstances” (discretionary)
Primus	Yes – phone, VoIP, LD, post-paid calling cards, internet	Residential \$0.99	Paper bills not available for subscribers to VoIP services
SSI	No		Customers receive e-bills automatically, but would offer paper bills for “no charge”
Distributel	Yes – through one affiliate	\$2	<ul style="list-style-type: none"> Automatic e-billing No current paper billing customers
Cogeco	No		
Telephone Guevremont Inc.	Yes – if more services than telephone alone (e.g., TV and/or internet)	\$3	

Maskatel	Yes – if more services than telephone alone (e.g., TV and/or internet)	\$3	
Eastlink	No – offer promotional incentives	Rebate of \$5 or AirMiles bonus	Looking to develop a program for waiving the fee in “special circumstances”
Quebecor	No		No wireless fee for online detailed bill
TSE	No		
Novus	No		
MTS	No		
Tbay Tel	Yes – Bundle credits (of \$4) for those meeting Tbay criteria (HSPA voice and home phone) and who contact Tbay	\$2	Wireline billing policy changed to fee for paper bill as of July 2013
Bell	Yes – Bell TV, Bell Canada, Bell Aliant (ON & Que) For: 1) new (as of 11 Dec 2011) residential customers with phone+, internet, TV 2) Existing customers acquiring Net or TV or phone+ after 11 Dec 2011 3) Existing customers who subscribe to internet or TV after 11 Dec 2011 4) New phone+ customers after 11 Dec 2011 5) All net customers	\$2	<ul style="list-style-type: none"> • Phone+ indicates more than residential primary exchange services (basic phones) • Note that in “all cases” the monthly rate of \$2 fee plus the fee for phone service is equal or less than the approved maximum monthly rate rant for home phone service (as set by the Commission) • Phone only customers (not phone+) do not receive any fee for paper bills • Customers receiving bills in alternative formats are exempt
	Yes – Telbec & NorthernTel	\$2	Customers receiving bills in alternative formats are exempt
	Exempt affiliated companies (no fee): Bell Aliant in Atlantic region; Cablevision du Nord; DMTS; KMTS and Northwestel	No	

CRTC Response from Wireless Providers

Companies	Wireless		Additional Notes
	Policy	Fee	
Sasktel	No	No	Indicate the importance of ecommerce & ebills for social and environmental purposes
Telus	Yes	\$2	
WIND	Yes for detailed bills	\$4	<ul style="list-style-type: none"> No bills available for pre-paid customers WIND – 0.006% of customer base receive paper bills
Rogers	Yes	\$2	<ul style="list-style-type: none"> Charge for all services (cable, VOIP, BBD, wireless) as of Sept 2013 Waived for those without internet access, alternative formats and “exceptional circumstances” (discretionary)
SSI	No		Customers receive e-bills automatically, but would offer paper bills for “no charge”
Eastlink	Yes	\$2	Looking to develop a program for waiving the fee in “special circumstances”
Quebecor	Yes – for detailed paper bill	\$3	No wireless fee for online detailed bill
Tbay	Yes	\$2	Wireline billing policy changed to fee for paper bill as of July 2013
Bell	Yes – for any customers joining after June 2008	\$2	<ul style="list-style-type: none"> Note that in “all cases” monthly rate of \$2 fee plus the fee for phone service is equal or less than the approved maximum monthly rate for home phone service (as set by the Commission) Customers receiving bills in alternative formats are exempt

Appendix B – PIAC and Environics Research Group, Pay for Paper Bills Study

PIAC – Paper Billing Fees Omnibus – Aug/Sept 2013

Q1. Do you yourself ever receive and pay any of the bills that come to your household on a regular basis, such as phone and cable TV bills, gas or electricity bills, credit card bills, internet service bills etc...?

SIZE	GENDER		AGE				REGION						CITIES			C-				
	TOTAL	M	F	18-29	30-44	45-59	60+	ATL	QC	ON	MB/SK	AB	BC	Can.	Rest eal	Montr nto	Toro uver	Vanco	Over 1 Mi.	100K-999K
(T)	(U)	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)	(M)	(N)	(O)	(P)	(Q)	(R)	(S)
5K- Under 99K 5K	2005	972	1033	387	504	582	532	143	481	768	130	213	269	1524	231	332	141	835	355	
UNWEIGHTED TOTAL 555 342	2005	1004	1001	156	371	655	823	252	502	500	250	250	251	1503	230	200	127	712	396	
Yes, I receive/pay bills 82% 86%	83%	79%	86%	63%	88%	89%	86%	84%	87%	82%	76%	79%	83%	82%	85%	82%	87%	83%	81%	
No, I do not receive/pay any bills 17% 14%	17%	20%	13%	37%	12%	11%	13%	16%	13%	17%	23%	21%	16%	18%	14%	17%	13%	16%	19%	
DK/NA *% *	*%	*%	*%	-	*%	*%	*%	-	*%	*%	*%	-	*%	*%	1%	1%	-	1%	*%	

Comparison Groups: BC/DEFG/HI JKLMN/OPQ/RSTU
 Independent T-Test for Means (equal variances), Independent Z-Test for Percentages
 Upper case letters indicate significance at the 95% level.

PIAC – Paper Billing Fees Omnibus – Aug/Sept 2013

Q1. Do you yourself ever receive and pay any of the bills that come to your household on a regular basis, such as phone and cable TV bills, gas or electricity bills, credit card bills, internet service bills etc..?

	EDUCATION					EMPLOYMENT STATUS								FAMILY INCOME				
	==== TOTAL	Publ. Schl	High Schl	Coll.	Post Grad.	Home- maker	Stu- dent	Re- tired	Unemp loyed	TOTAL Emp- loyed	Emp. Full- time	Emp. Part- time	Self Emp- loyed	Under \$30K	\$30K Under \$50K	\$50K Under \$80K	\$80K Under \$100K	Over \$100K
	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)	(M)	(N)	(O)	(P)	(Q)	(R)
TOTAL	2005	251	423	682	599	135	99	97	470	1178	819	171	188	260	271	328	242	382
UNWEIGHTED TOTAL	2005	300	410	641	597	63	84	78	701	1051	725	138	188	288	293	325	226	348
Yes, I receive/pay bills	83%	79%	80%	82%	88% BCD	60%	83% FH	68%	87% FHL	85% FHL	86% FHL	74%	89% FHL	81%	86%	89% NR	82%	80%
No, I do not receive/pay any bills	17%	20% E	20% E	18% E	12%	40% GIJKM	17%	32% GIJKM	13%	15%	13%	26% IJKM	11%	19% P	14%	11%	17%	19% P
DK/NA	***	1%	1%	-	***	-	-	-	1%	***	***	***	***	***	-	***	1%	***

Comparison Groups: BCDE/FGHIJKLM/NOPQR
 Independent T-Test for Means (equal variances), Independent Z-Test for Percentages
 Upper case letters indicate significance at the 95% level.

PIAC – Paper Billing Fees Omnibus – Aug/Sept 2013

Q1. Do you yourself ever receive and pay any of the bills that come to your household on a regular basis, such as phone and cable TV bills, gas or electricity bills, credit card bills, internet service bills etc..?

	PREFERRED BILL PAYMENT METHOD			
	TOTAL	Mostly pay by mail/in-person	Mostly Pay Online	No, I Do Not Receive/Pay Any Bills
	(A)	(B)	(C)	(D)
TOTAL	2005	540	1003	336
UNWEIGHTED TOTAL	2005	660	938	279
Yes, I receive/pay bills	83%	100%	100%	-
No, I do not receive/pay any bills	17%	-	-	100%
DK/NA	*%	-	-	-

Comparison Groups: BCD
 Independent T-Test for Means (equal variances), Independent Z-Test for Percentages
 Upper case letters indicate significance at the 95% level.

Sep. 18, 2013/Page 3

PIAC – Paper Billing Fees Omnibus – Aug/Sept 2013

Q2. How do you feel personally about receiving bills or invoices online? Are you very, somewhat, not very or not at all comfortable with this?
 Subsample: Those who receive and pay any of the bills that come to their household on a regular basis

SIZE	GENDER		AGE				REGION						CITIES				C- Over 100K- 1 Mi. 999K		
	M	F	18-29	30-44	45-59	60+	ATL	QC	ON	MB/SK	AB	BC	Rest Can.	Montr eal	Toro nto	Vanco uver			
TOTAL	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)	(M)	(N)	(O)	(P)	(Q)	(R)	(S)
5K- Under 99K 5K	1662	770	892	246	441	515	460	121	418	631	99	168	224	1244	196	271	123	695	286
UNWEIGHTED TOTAL 476 298	1718	830	888	100	328	576	714	220	447	420	207	210	214	1271	201	167	113	614	330
TOP 2 BOX 55% 51%	60%	62%	57%	80%	70%	57%	41%	63%	69%	58%	52%	50%	54%	57%	73%	63%	63%	65%	61%
Very comfortable 33% 27%	36%	39%	33%	55%	42%	33%	23%	34%	43%	35%	26%	31%	31%	33%	52%	34%	34%	39%	38%
Somewhat comfortable 22% 24%	24%	23%	25%	25%	28%	24%	18%	29%	25%	23%	26%	19%	23%	23%	21%	29%	30%	26%	23%
Not very comfortable 15% 13%	13%	13%	13%	13%	12%	16%	12%	14%	12%	11%	17%	22%	13%	13%	11%	10%	11%	12%	12%
Not at all comfortable 22% 27%	20%	18%	21%	4%	14%	22%	31%	16%	14%	22%	21%	21%	24%	22%	13%	19%	18%	17%	20%
BOTTOM 2 BOX 37% 39%	33%	31%	34%	17%	26%	37%	43%	30%	26%	33%	39%	43%	36%	35%	23%	29%	29%	29%	32%
R																			
Cannot do it even if I 5% 7% wanted, no internet	5%	4%	5%	1%	1%	3%	12%	6%	3%	4%	6%	4%	8%	5%	1%	5%	7%	4%	4%
DK/NA 3% 3%	3%	3%	3%	2%	2%	3%	4%	1%	2%	4%	3%	3%	1%	3%	2%	3%	1%	3%	3%

Comparison Groups: BC/DEFG/HI JKLMN/OPQ/RSTU
 Independent T-Test for Means (equal variances), Independent Z-Test for Percentages
 Upper case letters indicate significance at the 95% level.

PIAC – Paper Billing Fees Omnibus – Aug/Sept 2013

Q2. How do you feel personally about receiving bills or invoices online? Are you very, somewhat, not very or not at all comfortable with this?
 Subsample: Those who receive and pay any of the bills that come to their household on a regular basis

	EDUCATION					EMPLOYMENT STATUS								FAMILY INCOME				
	TOTAL	Publ. Schl	High Schl	Coll.	Post Grad.	Home-maker	Stu- dent	Re- tired	Unemp- loyed	TOTAL Emp- loyed	Emp. Full- time	Emp. Part- time	Self Emp- loyed	Under \$30K	\$30K Under \$50K	\$50K Under \$80K	\$80K Under \$100K	Over \$100K
	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)	(M)	(N)	(O)	(P)	(Q)	(R)
TOTAL	1662	200	337	556	527	81	82	66	408	1000	707	127	167	211	234	292	199	308
UNWEIGHTED TOTAL	1718	248	342	544	534	40	71	57	605	920	635	115	170	249	260	290	190	291
TOP 2 BOX	60%	39%	51%	62%	70%	77%	51%	58%	42%	67%	68%	66%	64%	49%	51%	65%	75%	74%
Very comfortable	36%	22%	30%	38%	42%	60%	25%	39%	24%	40%	39%	41%	42%	29%	32%	37%	39%	50%
Somewhat comfortable	24%	17%	21%	24%	28%	16%	27%	19%	18%	27%	29%	24%	22%	20%	19%	28%	35%	24%
Not very comfortable	13%	14%	16%	10%	13%	11%	16%	16%	10%	14%	14%	17%	14%	9%	15%	13%	12%	10%
Not at all comfortable	20%	30%	23%	21%	12%	9%	24%	22%	31%	15%	15%	13%	16%	30%	25%	18%	10%	13%
BOTTOM 2 BOX	33%	44%	40%	32%	26%	20%	40%	37%	41%	29%	29%	29%	30%	39%	40%	31%	22%	23%
Cannot do it even if I wanted, no internet	5%	14%	6%	3%	2%	-	5%	3%	12%	2%	1%	5%	4%	9%	7%	3%	2%	1%
DK/NA	3%	2%	3%	3%	2%	4%	4%	1%	5%	2%	2%	1%	1%	4%	2%	1%	2%	2%

Comparison Groups: BCDE/FGHIJKLM/NOPQR
 Independent T-Test for Means (equal variances), Independent Z-Test for Percentages
 Upper case letters indicate significance at the 95% level.

PIAC – Paper Billing Fees Omnibus – Aug/Sept 2013

Q2. How do you feel personally about receiving bills or invoices online? Are you very, somewhat, not very or not at all comfortable with this?
 Subsample: Those who receive and pay any of the bills that come to their household on a regular basis

	PREFERRED BILL PAYMENT METHOD			
	TOTAL	Mostly pay by mail/in-person	Mostly Pay Online	No, I Do Not Receive/Pay Any Bills
	(A)	(B)	(C)	(D)
TOTAL	1662	540	1003	-
UNWEIGHTED TOTAL	1718	660	938	-
TOP 2 BOX	60%	23%	79% B	-
Very comfortable	36%	9%	51% B	-
Somewhat comfortable	24%	14%	28% B	-
Not very comfortable	13%	19% C	10%	-
Not at all comfortable	20%	43% C	8%	-
BOTTOM 2 BOX	33%	62% C	18%	-
Cannot do it even if I wanted, no internet	5%	11% C	1%	-
DK/NA	3%	4%	2%	-

Comparison Groups: BCD
 Independent T-Test for Means (equal variances), Independent Z-Test for Percentages
 Upper case letters indicate significance at the 95% level.

Sep. 18, 2013/Page 6

PIAC – Paper Billing Fees Omnibus – Aug/Sept 2013

Q3. What is the main reason you are not comfortable with receiving your bills electronically?
 Subsample: Those who are uncomfortable receiving bills/invoices online

SIZE	GENDER		AGE				REGION						CITIES				C-		
	TOTAL	M	F	18-29	30-44	45-59	60+	ATL	QC	ON	MB/SK	AB	BC	Rest Can.	Montr eal	Toro nto	Vanco uver	Over 1 Mi.	100K-999K
(T)	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)	(M)	(N)	(O)	(P)	(Q)	(R)	(S)
5K- Under 99K 5K	547	241	307	42	115	192	198	36	109	210	38	72	81	438	46	78	36	199	92
UNWEIGHTED TOTAL 187 129	632	282	350	19	86	219	308	83	134	151	90	92	82	498	60	51	35	200	116
Security concerns (i.e. 30% 31% identity theft/fraud)	33%	32%	34%	33%	41%	29%	33%	33%	29%	34%	37%	27%	41%	34%	38%	31%	43%	34%	38%
Just prefer paper 15% 20%	16%	20%	13%	30%	13%	20%	11%	13%	19%	15%	23%	14%	13%	15%	19%	17%	14%	16%	12%
Have no internet access/do 20% 17% not use computers	15%	13%	16%	9%	9%	12%	22%	14%	14%	17%	14%	13%	11%	15%	12%	14%	10%	12%	10%
Not comfortable enough using 13% 9% computers	12%	13%	12%	11%	8%	12%	16%	23%	16%	12%	2%	13%	9%	12%	10%	16%	15%	13%	13%
Computer is unreliable/not on 6% 6% it enough	8%	9%	6%	5%	9%	9%	6%	4%	6%	9%	4%	13%	5%	8%	7%	10%	4%	9%	7%
Easier to read paper bills 4% 5%	4%	5%	4%	5%	2%	7%	4%	3%	5%	4%	6%	4%	4%	4%	3%	-	-	1%	11%
Like to be able to file away 5% 2% paper bills	4%	4%	4%	-	7%	4%	4%	1%	4%	3%	3%	7%	5%	4%	5%	2%	3%	5%	2%
More detail in paper bills 2% 5%	3%	1%	5%	-	6%	2%	3%	2%	2%	3%	3%	1%	5%	3%	-	8%	3%	4%	*%
Can't afford internet access 1% *%	1%	*%	1%	-	1%	1%	*%	3%	-	-	1%	2%	-	1%	-	-	-	-	-
Other 1% *%	2%	1%	3%	7%	1%	4%	1%	-	4%	-	3%	5%	4%	2%	5%	-	6%	4%	3%

DK/NA 2% 2% 2% - 4% 1% 2% 3% 1% 2% 3% 2% 2% 2% - 3% 3% 1% 3%
1% 4%

Comparison Groups: BC/DEFG/HI JKLMN/OPQ/RSTU
Independent T-Test for Means (equal variances), Independent Z-Test for Percentages
Upper case letters indicate significance at the 95% level.

Sep. 18, 2013/Page 7

PIAC – Paper Billing Fees Omnibus – Aug/Sept 2013

Q3. What is the main reason you are not comfortable with receiving your bills electronically?

Subsample: Those who are uncomfortable receiving bills/invoices online

	EDUCATION				EMPLOYMENT STATUS								FAMILY INCOME					
	==== TOTAL -----	Publ. Schl	High Schl	Coll.	Post Grad.	Home- maker	Stu- dent	Re- tired	Unemp- loyed	TOTAL Emp- loyed	Emp. Full- time	Emp. Part- time	Self Emp- loyed	Under \$30K	\$30K Under \$50K	\$50K Under \$80K	\$80K Under \$100K	Over \$100K
	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)	(M)	(N)	(O)	(P)	(Q)	(R)
TOTAL	547	88	135	176	135	16	33	25	168	293	206	37	50	82	94	90	44	71
UNWEIGHTED TOTAL	632	120	154	194	149	10	26	27	255	300	201	43	56	114	109	104	50	73
Security concerns (i.e. identity theft/fraud)	33%	33%	33%	32%	36%	43%	40%	40%	34%	30%	28%	42%	31%	36%	27%	32%	31%	30%
Just prefer paper	16%	11%	15%	17%	19%	35%	13%	10%	9%	19% I	18% I	15%	27% I	11%	17%	13%	20%	20%
Have no internet access/do not use computers	15%	18% E	24% E	14% E	5%	11%	18%	4%	22% HJKLM	11% L	14% L	1%	8%	25% PQ	17% Q	11%	4%	14%
Not comfortable enough using computers	12%	18%	10%	14%	10%	-	20%	14%	15%	11%	11%	12%	10%	13%	17%	12%	12%	7%
Computer is unreliable/not on it enough	8%	5%	6%	8%	11%	-	-	16%	6%	10%	11%	5%	6%	1%	10% N	10% N	9% N	14% N
Easier to read paper bills	4%	1%	5%	4%	6% B	10%	-	5%	4%	5%	5%	5%	5%	3%	8%	5%	7%	3%
Like to be able to file away paper bills	4%	4%	4%	4%	3%	-	-	6%	4%	5%	3%	12%	6%	2%	2%	9% NO	4%	5%
More detail in paper bills	3%	2%	1%	4% C	5% C	-	6%	-	3%	3%	2%	3%	5%	4% O	1%	4%	2%	2%
Can't afford internet access	1%	1%	1%	*%	-	-	-	-	-	1%	1%	-	1%	1%	1%	-	3%	-
Other	2%	2%	2%	2%	1%	-	-	-	2%	4%	5%	3%	-	1%	1%	2%	2%	2%
DK/NA	2%	5%	1%	1%	3%	-	3%	4%	2%	2%	3%	-	3%	3%	*%	2%	6%	2%

Comparison Groups: BCDE/FGHIJKLM/NOPQR
 Independent T-Test for Means (equal variances), Independent Z-Test for Percentages
 Upper case letters indicate significance at the 95% level.

Q3. What is the main reason you are not comfortable with receiving your bills electronically?
 Subsample: Those who are uncomfortable receiving bills/invoices online

	PREFERRED BILL PAYMENT METHOD			
	TOTAL	Mostly pay by mail/in-person	Mostly Pay Online	No, I Do Not Receive/Pay Any Bills
	(A)	(B)	(C)	(D)
TOTAL	547	334	176	-
UNWEIGHTED TOTAL	632	401	185	-
Security concerns (i.e. identity theft/fraud)	33%	40% C	19%	-
Just prefer paper	16%	9%	28% B	-
Have no internet access/do not use computers	15%	21% C	4%	-
Not comfortable enough using computers	12%	14%	8%	-
Computer is unreliable/not on it enough	8%	3%	16% B	-
Easier to read paper bills	4%	4%	6%	-
Like to be able to file away paper bills	4%	2%	8% B	-
More detail in paper bills	3%	2%	5%	-
Can't afford internet access	1%	*%	1%	-
Other	2%	2%	4%	-
DK/NA	2%	2%	1%	-

Comparison Groups: BCD
 Independent T-Test for Means (equal variances), Independent Z-Test for Percentages
 Upper case letters indicate significance at the 95% level.

PIAC – Paper Billing Fees Omnibus – Aug/Sept 2013

Q4. When you pay your regular bills to these service providers (i.e. banks or credit card companies, utilities, telecommunications companies etc.), do you mostly pay them by regular mail (or in-person) or do you mostly pay them by online transaction?

Subsample: Those who receive and pay any of the bills that come to their household on a regular basis

SIZE	GENDER		AGE				REGION							CITIES			C- Over 100K- 1 Mi. 999K		
	TOTAL	M	F	18-29	30-44	45-59	60+	ATL	QC	ON	MB/SK	AB	BC	Rest Can.	Montr eal	Toro nto		Vanco uver	
(T) (U)	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)	(M)	(N)	(O)	(P)	(Q)	(R)	(S)
5K- Under 99K 5K	1662	770	892	246	441	515	460	121	418	631	99	168	224	1244	196	271	123	695	286
TOTAL 456 225	1718	830	888	100	328	576	714	220	447	420	207	210	214	1271	201	167	113	614	330
UNWEIGHTED TOTAL 476 298	33%	32%	33%	25%	19%	31%	51%	38%	30%	31%	33%	37%	35%	33%	27%	28%	32%	28%	31%
Mostly pay by mail/in-person 36% 40%	60%	61%	60%	68%	75%	61%	41%	58%	66%	59%	58%	58%	57%	58%	69%	60%	62%	64%	61%
Mostly pay online 56% 56%	5%	5%	5%	7%	5%	5%	4%	3%	2%	8%	7%	3%	5%	6%	2%	9%	5%	6%	5%
Both equally 5% 2%	2%	2%	2%	-	1%	3%	4%	1%	2%	3%	2%	2%	3%	2%	2%	3%	1%	2%	3%
DK/NA 2% 2%																			

Comparison Groups: BC/DEFG/HI JKLMN/OPQ/RSTU
 Independent T-Test for Means (equal variances), Independent Z-Test for Percentages
 Upper case letters indicate significance at the 95% level.

PIAC – Paper Billing Fees Omnibus – Aug/Sept 2013

Q4. When you pay your regular bills to these service providers (i.e. banks or credit card companies, utilities, telecommunications companies etc.), do you mostly pay them by regular mail (or in-person) or do you mostly pay them by online transaction?

Subsample: Those who receive and pay any of the bills that come to their household on a regular basis

	EDUCATION				EMPLOYMENT STATUS								FAMILY INCOME					
	===== TOTAL ----- (A)	Publ. Schl (B)	Hi gh Schl (C)	Post Coll. (D)	Post Grad. (E)	Home- maker (F)	Stu- dent (G)	Re- tired (H)	Unemp loyed (I)	TOTAL Emp- loyed (J)	Emp. Full- time (K)	Emp. Part- time (L)	Self Emp- loyed (M)	Under \$30K (N)	\$30K Under \$50K (O)	\$50K Under \$80K (P)	\$80K Under \$100K (Q)	Over \$100K (R)
TOTAL	1662	200	337	556	527	81	82	66	408	1000	707	127	167	211	234	292	199	308
UNWEIGHTED TOTAL	1718	248	342	544	534	40	71	57	605	920	635	115	170	249	260	290	190	291
Mostly pay by mail/in-person	33%	61% CDE	42% DE	27%	22%	25%	39% JK	44% JK	49% JKLM	25%	23%	26%	29%	48% PQR	42% PQR	26% R	17%	17%
Mostly pay online	60%	30%	52% B	65% BC	72% BCD	70% HI	57% I	45%	42%	69% HI	71% GHI	63% HI	64% HI	44%	49%	68% NO	77% NO	79% NOP
Both equally	5%	5%	4%	6%	5%	5%	3%	9%	4%	5%	4%	8%	6%	4%	7%	4%	6%	4%
DK/NA	2%	4%	2%	3%	1%	-	*%	3%	5% GJKM	1%	1%	3%	2%	3%	2%	2%	*%	1%

Comparison Groups: BCDE/FGHIJKLM/NOPQR
 Independent T-Test for Means (equal variances), Independent Z-Test for Percentages
 Upper case letters indicate significance at the 95% level.

PIAC – Paper Billing Fees Omnibus – Aug/Sept 2013

Q4. When you pay your regular bills to these service providers (i.e. banks or credit card companies, utilities, telecommunications companies etc.), do you mostly pay them by regular mail (or in-person) or do you mostly pay them by online transaction?

Subsample: Those who receive and pay any of the bills that come to their household on a regular basis

	PREFERRED BILL PAYMENT METHOD			
	TOTAL	Mostly pay by mail/in-person	Mostly Pay Online	No, I Do Not Receive/Pay Any Bills
	(A)	(B)	(C)	(D)
TOTAL	1662	540	1003	-
UNWEIGHTED TOTAL	1718	660	938	-
Mostly pay by mail/in-person	33%	100%	-	-
Mostly pay online	60%	-	100%	-
Both equally	5%	-	-	-
DK/NA	2%	-	-	-

Comparison Groups: BCD
 Independent T-Test for Means (equal variances), Independent Z-Test for Percentages
 Upper case letters indicate significance at the 95% level.

Sep. 18, 2013/Page 12

PIAC – Paper Billing Fees Omnibus – Aug/Sept 2013

Q5. How do you or would you feel about paying your bills online or electronically? Are you very, somewhat, not very or not at all comfortable with doing this?

Subsample: Those who receive and pay any of the bills that come to their household on a regular basis

SIZE	GENDER		AGE				REGION							CITIES			C- Over 100K- 1 Mi. 999K		
	TOTAL	M	F	18-29	30-44	45-59	60+	ATL	QC	ON	MB/SK	AB	BC	Rest Can.	Montr eal	Toro nto		Vanco uver	
(T)	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)	(M)	(N)	(O)	(P)	(Q)	(R)	(S)
5K- Under 99K 5K	1662	770	892	246	441	515	460	121	418	631	99	168	224	1244	196	271	123	695	286
UNWEIGHTED TOTAL 476 298	1718	830	888	100	328	576	714	220	447	420	207	210	214	1271	201	167	113	614	330
TOP 2 BOX 65% 61%	68%	71%	65%	87%	83%	68%	43%	66%	74%	67%	66%	65%	63%	66%	78%	71%	68%	72%	67%
Very comfortable 51% 46%	54%	56%	51%	75%	69%	51%	31%	55%	57%	54%	51%	52%	49%	53%	67%	58%	55%	61%	47%
Somewhat comfortable 14% 15%	14%	15%	13%	12%	14%	17%	12%	11%	17%	13%	15%	13%	14%	13%	11%	13%	13%	12%	20%
Not very comfortable 6% 11%	7%	6%	9%	7%	6%	8%	9%	10%	10%	6%	10%	6%	6%	7%	8%	6%	6%	7%	8%
Not at all comfortable 22% 23%	19%	18%	21%	3%	10%	20%	37%	20%	14%	21%	17%	24%	24%	21%	12%	17%	18%	16%	21%
BOTTOM 2 BOX 28% 34%	27%	24%	29%	10%	16%	28%	45%	30%	24%	26%	27%	30%	30%	28%	21%	23%	25%	23%	29%
Cannot do it even if I 5% 4% wanted, no internet	4%	3%	4%	2%	1%	2%	9%	4%	1%	4%	6%	4%	5%	5%	0	5%	5%	3%	3%
DK/NA 2% 1%	2%	1%	2%	1%	1%	1%	3%	0	1%	2%	1%	1%	2%	2%	1%	1%	2%	1%	2%

Comparison Groups: BC/DEFG/HI JKLMN/OPQ/RSTU
Independent T-Test for Means (equal variances), Independent Z-Test for Percentages
Upper case letters indicate significance at the 95% level.

PIAC – Paper Billing Fees Omnibus – Aug/Sept 2013

Q5. How do you or would you feel about paying your bills online or electronically? Are you very, somewhat, not very or not at all comfortable with doing this?

Subsample: Those who receive and pay any of the bills that come to their household on a regular basis

	EDUCATION				EMPLOYMENT STATUS								FAMILY INCOME					
	==== TOTAL	Publ. Schl	Hi gh Schl	Post Coll.	Post Grad.	Home- maker	Stu- dent	Re- tired	Unemp loyed	TOTAL Emp- loyed	Emp. Full- time	Emp. Part- time	Self Emp- loyed	Under \$30K	\$30K Under \$50K	\$50K Under \$80K	\$80K Under \$100K	Over \$100K
	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)	(M)	(N)	(O)	(P)	(Q)	(R)
TOTAL	1662	200	337	556	527	81	82	66	408	1000	707	127	167	211	234	292	199	308
UNWEIGHTED TOTAL	1718	248	342	544	534	40	71	57	605	920	635	115	170	249	260	290	190	291
TOP 2 BOX	68%	43%	58%	74%	78%	87%	65%	61%	43%	78%	80%	73%	74%	50%	60%	76%	84%	85%
Very comfortable	54%	31%	43%	58%	64%	77%	53%	45%	31%	62%	64%	60%	58%	40%	44%	58%	65%	74%
Somewhat comfortable	14%	11%	14%	16%	13%	10%	12%	16%	12%	16%	16%	13%	16%	10%	15%	18%	19%	11%
Not very comfortable	7%	9%	12%	5%	6%	6%	7%	13%	9%	7%	6%	8%	8%	9%	9%	5%	6%	3%
Not at all comfortable	19%	36%	24%	17%	14%	4%	24%	25%	35%	13%	13%	16%	14%	34%	23%	17%	8%	9%
BOTTOM 2 BOX	27%	45%	36%	22%	20%	10%	31%	38%	44%	20%	18%	24%	23%	43%	32%	22%	13%	12%
Cannot do it even if I wanted, no internet	4%	11%	4%	3%	1%	-	2%	1%	11%	1%	1%	2%	2%	6%	6%	1%	1%	2%
DK/NA	2%	1%	2%	2%	2%	2%	3%	-	3%	1%	1%	1%	2%	1%	3%	1%	2%	1%

Comparison Groups: BCDE/FGHI JKLM/NOPQR
 Independent T-Test for Means (equal variances), Independent Z-Test for Percentages
 Upper case letters indicate significance at the 95% level.

Q5. How do you or would you feel about paying your bills online or electronically? Are you very, somewhat, not very or not at all comfortable with doing this?

Subsample: Those who receive and pay any of the bills that come to their household on a regular basis

	PREFERRED BILL PAYMENT METHOD			
	TOTAL	Mostly pay by mail/in-person	Mostly Pay Online	No, I Do Not Receive/Pay Any Bills
	(A)	(B)	(C)	(D)
TOTAL	1662	540	1003	-
UNWEIGHTED TOTAL	1718	660	938	-
TOP 2 BOX	68%	21%	94% B	-
Very comfortable	54%	10%	80% B	-
Somewhat comfortable	14%	11%	14%	-
Not very comfortable	7%	16% C	2%	-
Not at all comfortable	19%	51% C	2%	-
BOTTOM 2 BOX	27%	67% C	5%	-
Cannot do it even if I wanted, no internet	4%	9% C	1%	-
DK/NA	2%	3% C	1%	-

Comparison Groups: BCD
 Independent T-Test for Means (equal variances), Independent Z-Test for Percentages
 Upper case letters indicate significance at the 95% level.

PIAC – Paper Billing Fees Omnibus – Aug/Sept 2013

Q6. What is the main reason you are not comfortable with paying bills online or electronically?
 Subsample: Those who are not comfortable with paying bills online or electronically

SIZE	GENDER		AGE				REGION						CITIES					C- 100K- 999K	
	TOTAL	M	F	18-29	30-44	45-59	60+	ATL	QC	ON	MB/SK	AB	BC	Rest Can.	Montr eal	Toro nto	Vanco uver		Over 1 Mi.
(T)	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)	(M)	(N)	(O)	(P)	(Q)	(R)	(S)
5K- Under 99K 5K	448	185	263	25	69	146	209	36	101	167	27	50	67	347	41	63	31	161	82
UNWEIGHTED TOTAL 162 122	570	254	316	12	53	169	336	82	133	126	82	77	70	437	59	43	31	177	109
Security concerns (i.e. 56% 55% identity theft/fraud/being hacked)	58%	57%	60%	58%	78%	66%	47%	60%	49%	63%	64%	54%	61%	61%	48%	62%	62%	58%	67%
Not comfortable enough using 20% 17% computers	15%	13%	16%	19%	3%	13%	20%	21%	20%	11%	5%	20%	14%	13%	13%	10%	6%	11%	11%
Have no internet access/do 9% 10% not use computers	12%	10%	14%	-	3%	12%	17%	11%	12%	14%	13%	8%	12%	12%	21%	15%	15%	16%	11%
Prefer personal contact 5% 6%	3%	5%	3%	8%	-	2%	5%	2%	5%	4%	2%	2%	3%	3%	3%	4%	-	3%	1%
Just prefer mailing a cheque 3% 3%	3%	5%	2%	15%	-	3%	3%	2%	5%	1%	8%	8%	1%	3%	10%	2%	2%	5%	*%
Can't afford internet access 2% 3%	2%	1%	2%	-	4%	1%	2%	3%	4%	1%	3%	-	1%	1%	1%	-	3%	1%	2%
Computer is unreliable/not on 3% 1% it enough	1%	2%	1%	-	4%	-	2%	-	1%	2%	1%	1%	-	1%	-	2%	-	1%	1%
Other 2% 3%	2%	3%	2%	-	4%	2%	2%	*%	3%	1%	3%	3%	5%	2%	3%	-	7%	2%	3%
DK/NA 1% 2%	2%	4%	1%	-	4%	1%	3%	1%	*%	4%	1%	4%	2%	3%	1%	4%	5%	3%	3%

Comparison Groups: BC/DEFG/HI JKLMN/OPQ/RSTU
 Independent T-Test for Means (equal variances), Independent Z-Test for Percentages
 Upper case letters indicate significance at the 95% level.

PIAC – Paper Billing Fees Omnibus – Aug/Sept 2013

Q6. What is the main reason you are not comfortable with paying bills online or electronically?

Subsample: Those who are not comfortable with paying bills online or electronically

	EDUCATION				EMPLOYMENT STATUS								FAMILY INCOME					
	==== TOTAL -----	Publ. Schl	High Schl	Coll.	Post Grad.	Home- maker	Stu- dent	Re- tired	Unemp- loyed	TOTAL Emp- loyed	Emp. Full- time	Emp. Part- time	Self Emp- loyed	Under \$30K	\$30K Under \$50K	\$50K Under \$80K	\$80K Under \$100K	Over \$100K
	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)	(M)	(N)	(O)	(P)	(Q)	(R)
TOTAL	448	91	121	122	105	8	25	25	178	199	130	31	38	91	75	66	26	37
UNWEIGHTED TOTAL	570	133	145	149	126	6	24	28	281	218	136	35	47	128	96	81	33	44
Security concerns (i.e. identity theft/fraud/being hacked)	58%	46%	59%	57%	69% B	90% I	57%	74% I	47%	65% I	66% I	64%	61%	55%	56%	54%	62%	63%
Not comfortable enough using computers	15%	25% CE	12%	15%	10%	-	28%	13%	19% JK	10%	9%	12%	13%	15%	15%	9%	12%	6%
Have no internet access/do not use computers	12%	15% E	18% E	12% E	4%	-	9%	3%	18% HJKL	9%	9%	2%	12%	21% QR	14%	13%	6%	5%
Prefer personal contact	3%	3%	3%	3%	5%	10%	1%	-	4%	4%	4%	1%	5%	2%	7%	4%	-	5%
Just prefer mailing a cheque	3%	5%	4%	2%	2%	-	3%	5%	2%	4%	4%	7%	3%	3%	4%	1%	11%	3%
Can't afford internet access	2%	2%	-	4%	2%	-	2%	-	2%	1%	2%	-	-	3%	3%	1%	-	-
Computer is unreliable/not on it enough	1%	-	2%	2%	2%	-	-	-	2%	2%	2%	-	-	-	1%	4%	2%	3%
Other	2%	2%	*%	3%	4%	-	-	5%	3%	2%	2%	9%	-	1%	-	3%	2%	10%
DK/NA	2%	3%	2%	3%	1%	-	-	-	3%	3%	1%	5%	7%	*%	1%	9% NO	5%	4%

Comparison Groups: BCDE/FGHIJKLM/NOPQR
 Independent T-Test for Means (equal variances), Independent Z-Test for Percentages
 Upper case letters indicate significance at the 95% level.

Q6. What is the main reason you are not comfortable with paying bills online or electronically?
 Subsample: Those who are not comfortable with paying bills online or electronically

	PREFERRED BILL PAYMENT METHOD			
	TOTAL	Mostly pay by mail/in-person	Mostly Pay Online	No, I Do Not Receive/Pay Any Bills
	(A)	(B)	(C)	(D)
TOTAL	448	360	49	-
UNWEIGHTED TOTAL	570	467	57	-
Security concerns (i.e. identity theft/fraud/being hacked)	58%	58%	55%	-
Not comfortable enough using computers	15%	15%	14%	-
Have no internet access/do not use computers	12%	12%	15%	-
Prefer personal contact	3%	3%	6%	-
Just prefer mailing a cheque	3%	4%	1%	-
Can't afford internet access	2%	2%	1%	-
Computer is unreliable/not on it enough	1%	1%	2%	-
Other	2%	2%	4%	-
DK/NA	2%	3%	1%	-

Comparison Groups: BCD
 Independent T-Test for Means (equal variances), Independent Z-Test for Percentages
 Upper case letters indicate significance at the 95% level.

PIAC – Paper Billing Fees Omnibus – Aug/Sept 2013

Q7. Some companies charge their customers an extra fee to get their bills and statements on paper by mail, as opposed to getting them online electronically. Have you personally ever been notified you were being charged such a fee?

SIZE	GENDER		AGE				REGION						CITIES				C-			
	TOTAL	M	F	18-29	30-44	45-59	60+	ATL	QC	ON	MB/SK	AB	BC	Rest Can.	Montr eal	Toro nto	Vanco uver	Over 1 Mi.	100K-999K	
(T)	(U)	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)	(M)	(N)	(O)	(P)	(Q)	(R)	(S)
5K- Under 99K 5K	2005	972	1033	387	504	582	532	143	481	768	130	213	269	1524	231	332	141	835	355	
UNWEIGHTED TOTAL 555 342	2005	1004	1001	156	371	655	823	252	502	500	250	250	251	1503	230	200	127	712	396	
Yes 41% 40%	43%	44%	42%	49%	45%	48%	32%	42%	43%	48%	21%	46%	37%	43%	48%	54%	37%	48%	36%	
No, have not 58% 59%	56%	55%	56%	51%	54%	50%	67%	57%	56%	51%	77%	52%	61%	55%	51%	45%	61%	51%	61%	
R R				G	G	G		K	K	KM		K	K	K		Q		STU		
DK/NA 1% 1%	1%	1%	1%	-	1%	2%	2%	1%	1%	1%	2%	3%	2%	2%	1%	1%	2%	1%	3%	
							DEF			IJLMN			J			P		R		
											H									

Comparison Groups: BC/DEFG/HI JKLMN/OPQ/RSTU
 Independent T-Test for Means (equal variances), Independent Z-Test for Percentages
 Upper case letters indicate significance at the 95% level.

PIAC – Paper Billing Fees Omnibus – Aug/Sept 2013

Q7. Some companies charge their customers an extra fee to get their bills and statements on paper by mail, as opposed to getting them online electronically. Have you personally ever been notified you were being charged such a fee?

	EDUCATION				EMPLOYMENT STATUS								FAMILY INCOME					
	==== TOTAL	Publ. Schl	Hi gh Schl	Post Coll.	Post Grad.	Home- maker	Stu- dent	Re- tired	Unemp loyed	TOTAL Emp- loyed	Emp. Full- time	Emp. Part- time	Self Emp- loyed	Under \$30K	\$30K Under \$50K	\$50K Under \$80K	\$80K Under \$100K	Over \$100K
	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)	(M)	(N)	(O)	(P)	(Q)	(R)
TOTAL	2005	251	423	682	599	135	99	97	470	1178	819	171	188	260	271	328	242	382
UNWEIGHTED TOTAL	2005	300	410	641	597	63	84	78	701	1051	725	138	188	288	293	325	226	348
Yes	43%	31%	41%	46%	45%	47%	35%	45%	30%	49%	48%	53%	50%	45%	37%	46%	47%	49%
No, have not	56%	67%	56%	53%	54%	53%	61%	54%	67%	50%	51%	47%	48%	53%	60%	53%	52%	51%
DK/NA	1%	2%	2%	1%	1%	-	3%	1%	2%	1%	1%	1%	2%	1%	2%	1%	1%	1%

Comparison Groups: BCDE/FGHIJKLM/NOPQR
 Independent T-Test for Means (equal variances), Independent Z-Test for Percentages
 Upper case letters indicate significance at the 95% level.

PIAC – Paper Billing Fees Omnibus – Aug/Sept 2013

Q7. Some companies charge their customers an extra fee to get their bills and statements on paper by mail, as opposed to getting them online electronically. Have you personally ever been notified you were being charged such a fee?

	PREFERRED BILL PAYMENT METHOD			
	TOTAL	Mostly pay by mail/in-person	Mostly Pay Online	No, I Do Not Receive/Pay Any Bills
	(A)	(B)	(C)	(D)
TOTAL	2005	540	1003	336
UNWEIGHTED TOTAL	2005	660	938	279
Yes	43%	37%	49% BD	32%
No, have not	56%	61% C	50%	66% C
DK/NA	1%	2%	1%	2%

Comparison Groups: BCD
 Independent T-Test for Means (equal variances), Independent Z-Test for Percentages
 Upper case letters indicate significance at the 95% level.

Sep. 18, 2013/Page 21

PIAC – Paper Billing Fees Omnibus – Aug/Sept 2013

Q8. Have you personally ever paid this extra fee to receive a paper bill?
 Subsample: Those who have been notified of paper fees

SIZE	GENDER		AGE				REGION						CITIES				C-		
	TOTAL	M	F	18-29	30-44	45-59	60+	ATL	QC	ON	MB/SK	AB	BC	Rest Can.	Montr eal	Toro nto	Vanco uver	Over 1 Mi.	100K- 999K
(T)	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)	(M)	(N)	(O)	(P)	(Q)	(R)	(S)
5K- Under 99K 5K	862	424	438	190	226	278	168	60	208	369	27	97	100	654	111	179	53	400	130
UNWEIGHTED TOTAL 201 118	766	383	383	77	161	294	234	83	214	227	40	114	88	552	112	103	46	326	121
Yes 57% 65%	54%	51%	58%	55%	48%	57%	57%	61%	45%	57%	71%	63%	46%	57%	41%	62%	42%	53%	48%
No, have not 43% 35%	44%	48%	41%	45%	50%	42%	41%	36%	54%	42%	26%	36%	51%	41%	59%	38%	51%	46%	49%
DK/NA 1% *%	1%	1%	2%	-	2%	1%	2%	2%	*%	1%	3%	1%	4%	2%	1%	-	7%	1%	3%

Comparison Groups: BC/DEFG/HI JKLMN/OPQ/RSTU
 Independent T-Test for Means (equal variances), Independent Z-Test for Percentages
 Upper case letters indicate significance at the 95% level.

PIAC – Paper Billing Fees Omnibus – Aug/Sept 2013

Q8. Have you personally ever paid this extra fee to receive a paper bill?

Subsample: Those who have been notified of paper fees

	EDUCATION				EMPLOYMENT STATUS								FAMILY INCOME					
	TOTAL	Publ. Schl	High Schl	Coll.	Post Grad.	Home-maker	Stu- dent	Re- tired	Unemp- loyed	TOTAL Emp- loyed	Emp. Full- time	Emp. Part- time	Self Emp- loyed	Under \$30K	\$30K Under \$50K	\$50K Under \$80K	\$80K Under \$100K	Over \$100K
	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)	(M)	(N)	(O)	(P)	(Q)	(R)
TOTAL	862	79	175	314	269	63	35	43	142	573	389	90	93	117	101	152	114	186
UNWEIGHTED TOTAL	766	78	140	273	248	29	30	33	187	480	323	66	91	94	101	140	100	160
Yes	54%	65% D	65% DE	48%	52%	46%	74% IJKLM F	66%	52%	54%	54%	52%	54%	56%	64% R	53%	50%	50%
No, have not	44%	35%	35%	50% BC	46% C	54% G	26%	34%	45% G	45% G	45% G	46%	43%	43%	36%	46%	49%	48%
DK/NA	1%	-	1%	2%	1%	-	-	-	2%	1%	1%	3%	3%	*%	-	1%	2%	2%

Comparison Groups: BCDE/FGHIJKLM/NOPQR
 Independent T-Test for Means (equal variances), Independent Z-Test for Percentages
 Upper case letters indicate significance at the 95% level.

Q8. Have you personally ever paid this extra fee to receive a paper bill?

Subsample: Those who have been notified of paper fees

	PREFERRED BILL PAYMENT METHOD			
	TOTAL	Mostly pay by mail/in-person	Mostly Pay Online	No, I Do Not Receive/Pay Any Bills
	(A)	(B)	(C)	(D)
TOTAL	862	201	489	106
UNWEIGHTED TOTAL	766	208	422	79
Yes	54%	66% C	48%	60%
No, have not	44%	33%	51% B	39%
DK/NA	1%	1%	1%	1%

Comparison Groups: BCD
 Independent T-Test for Means (equal variances), Independent Z-Test for Percentages
 Upper case letters indicate significance at the 95% level.

PIAC – Paper Billing Fees Omnibus – Aug/Sept 2013

Q9. What do you think of this practice of companies charging people extra fees to get their bills on paper by regular mail?
Do you strongly approve, somewhat approve, somewhat disapprove or strongly disapprove?

SIZE	GENDER		AGE				REGION						CITIES				C- 100K- 999K		
	M	F	18-29	30-44	45-59	60+	ATL	QC	ON	MB/SK	AB	BC	Rest Can.	Montr eal	Toro nto	Vanco uver		Over 1 Mi.	
(T)	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)	(M)	(N)	(O)	(P)	(Q)	(R)	(S)
TOTAL 553	2005	972	1033	387	504	582	532	143	481	768	130	213	269	1524	231	332	141	835	355
UNWEIGHTED TOTAL 555	2005	1004	1001	156	371	655	823	252	502	500	250	250	251	1503	230	200	127	712	396
TOP 2 BOX 23% S	24%	25%	23%	48%	29%	16%	10%	17%	32%	22%	25%	25%	20%	22%	38%	25%	23%	29%	16%
Strongly approve 6% U	6%	7%	5%	13%	7%	4%	2%	3%	8%	6%	2%	5%	6%	5%	9%	7%	6%	8%	4%
Somewhat approve 17% S	18%	19%	18%	35%	23%	12%	8%	14%	24%	16%	23%	19%	14%	16%	28%	18%	17%	21%	13%
Somewhat disapprove 19% R	19%	17%	20%	19%	20%	21%	15%	23%	21%	16%	24%	16%	19%	18%	17%	15%	21%	17%	22%
Strongly disapprove 57% R	56%	55%	56%	33%	50%	62%	71%	59%	47%	60%	49%	57%	58%	58%	44%	58%	54%	53%	60%
BOTTOM 2 BOX 75% R	74%	72%	76%	52%	70%	83%	86%	81%	67%	77%	73%	73%	77%	76%	61%	73%	74%	70%	82%
DK/NA 2% R	2%	2%	1%	*%	1%	2%	4%	2%	1%	2%	2%	2%	3%	2%	1%	1%	2%	1%	2%

Comparison Groups: BC/DEFG/HI JKLMN/OPQ/RSTU
Independent T-Test for Means (equal variances), Independent Z-Test for Percentages
Upper case letters indicate significance at the 95% level.

PIAC – Paper Billing Fees Omnibus – Aug/Sept 2013

Q9. What do you think of this practice of companies charging people extra fees to get their bills on paper by regular mail?
Do you strongly approve, somewhat approve, somewhat disapprove or strongly disapprove?

	EDUCATION					EMPLOYMENT STATUS								FAMILY INCOME				
	==== TOTAL	Publ. Schl	High Schl	Coll.	Post Grad.	Home- maker	Stu- dent	Re- tired	Unemp- loyed	TOTAL Emp- loyed	Emp. Full- time	Emp. Part- time	Self Emp- loyed	Under \$30K	\$30K Under \$50K	\$50K Under \$80K	\$80K Under \$100K	Over \$100K
	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)	(M)	(N)	(O)	(P)	(Q)	(R)
TOTAL	2005	251	423	682	599	135	99	97	470	1178	819	171	188	260	271	328	242	382
UNWEIGHTED TOTAL	2005	300	410	641	597	63	84	78	701	1051	725	138	188	288	293	325	226	348
TOP 2 BOX	24%	17%	29% BD	22%	25% B	56% I JKLM GH	23% I	22%	12%	26% I	27% IM	24% I	20% I	26%	21%	24%	29%	30% 0
Strongly approve	6%	7%	7%	5%	5%	11% HI	6%	1%	3%	7% HI	8% HI	7%	5%	10% OP	3%	5%	7%	8% 0
Somewhat approve	18%	11%	22% BD	17% B	20% B	44% I JKLM GH	17%	22% I	9%	19% I	20% I	17% I	15%	16%	18%	19%	22%	22%
Somewhat disapprove	19%	11%	17%	21% B	21% B	18%	28% I	20%	15%	20% I	18%	24% I	22%	21%	17%	17%	19%	20%
Strongly disapprove	56%	67% CDE	53%	55%	54%	27%	48% F	56% F	69% GJKLM F	54% F	54% F	50% F	57% F	51%	61% R	58% R	52%	49%
BOTTOM 2 BOX	74%	78% C	70%	77% C	75%	44%	76% F	76% F	84% FJKL	73% F	72% F	75% F	79% FK	72%	78% R	75%	71%	69%
DK/NA	2%	5% CE	1%	2%	1%	-	1%	2%	4% GJKM	1%	1%	2%	1%	2%	1%	1%	1%	1%

Comparison Groups: BCDE/FGHIJKLM/NOPQR
Independent T-Test for Means (equal variances), Independent Z-Test for Percentages
Upper case letters indicate significance at the 95% level.

PIAC – Paper Billing Fees Omnibus – Aug/Sept 2013

Q9. What do you think of this practice of companies charging people extra fees to get their bills on paper by regular mail?
Do you strongly approve, somewhat approve, somewhat disapprove or strongly disapprove?

	PREFERRED BILL PAYMENT METHOD			
	TOTAL	Mostly pay by mail/in-person	Mostly Pay Online	No. I Do Not Receive/Pay Any Bills
	(A)	(B)	(C)	(D)
TOTAL	2005	540	1003	336
UNWEIGHTED TOTAL	2005	660	938	279
TOP 2 BOX	24%	15%	28% B	26% B
Strongly approve	6%	4%	7% B	7%
Somewhat approve	18%	11%	21% B	20% B
Somewhat disapprove	19%	16%	20%	23% B
Strongly disapprove	56%	67% CD	51%	46%
BOTTOM 2 BOX	74%	83% CD	71%	70%
DK/NA	2%	2%	1%	4%

Comparison Groups: BCD
Independent T-Test for Means (equal variances), Independent Z-Test for Percentages
Upper case letters indicate significance at the 95% level.

Sep. 18, 2013/Page 27

PIAC – Paper Billing Fees Omnibus – Aug/Sept 2013

Q10. What if instead of charging an extra fee for sending paper bills by mail, companies offered a discount to people who opt for “electronic billing”, would you strongly approve, somewhat approve, somewhat disapprove or strongly disapprove of companies doing that?

SIZE	GENDER		AGE				REGION						CITIES				C- Over 100K- 1 Mi. 999K		
	M	F	18-29	30-44	45-59	60+	ATL	QC	ON	MB/SK	AB	BC	Rest Can.	Montr eal	Toro nto	Vanco uver			
TOTAL	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)	(M)	(N)	(O)	(P)	(Q)	(R)	(S)
5K- Under 99K 5K	2005	972	1033	387	504	582	532	143	481	768	130	213	269	1524	231	332	141	835	355
UNWEIGHTED TOTAL 555 342	2005	1004	1001	156	371	655	823	252	502	500	250	250	251	1503	230	200	127	712	396
TOP 2 BOX 69% 63%	71%	74%	69%	83%	80%	73%	53%	68%	77%	70%	72%	70%	67%	70%	84%	76%	74%	78%	66%
Strongly approve 40% 36%	42%	43%	42%	52%	54%	41%	26%	36%	48%	42%	41%	41%	37%	40%	57%	44%	40%	47%	40%
Somewhat approve 30% 26%	29%	31%	27%	32%	26%	32%	27%	32%	29%	28%	31%	30%	30%	29%	27%	32%	34%	31%	26%
Somewhat disapprove 8% 10%	9%	7%	10%	8%	7%	8%	11%	9%	9%	9%	8%	5%	10%	9%	5%	9%	11%	7%	11%
Strongly disapprove 17% 22%	16%	15%	16%	7%	11%	16%	27%	15%	12%	18%	15%	18%	16%	17%	9%	14%	10%	12%	18%
BOTTOM 2 BOX 26% 32%	24%	22%	27%	14%	18%	24%	38%	24%	21%	27%	24%	23%	27%	26%	14%	23%	21%	19%	29%
DK/NA 5% 5%	4%	4%	4%	2%	2%	3%	8%	7%	2%	3%	5%	7%	7%	5%	2%	1%	5%	3%	5%

Comparison Groups: BC/DEFG/HI JKLMN/OPQ/RSTU
 Independent T-Test for Means (equal variances), Independent Z-Test for Percentages
 Upper case letters indicate significance at the 95% level.

PIAC – Paper Billing Fees Omnibus – Aug/Sept 2013

Q10. What if instead of charging an extra fee for sending paper bills by mail, companies offered a discount to people who opt for “electronic billing”, would you strongly approve, somewhat approve, somewhat disapprove or strongly disapprove of companies doing that?

	EDUCATION					EMPLOYMENT STATUS								FAMILY INCOME				
	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====
	TOTAL	Publ. Schl	High Schl	Coll.	Post Grad.	Home-maker	Stu- dent	Re- tired	Unemp- loyed	TOTAL Emp- loyed	Emp. Full- time	Emp. Part- time	Self Emp- loyed	Under \$30K	\$30K Under \$50K	\$50K Under \$80K	\$80K Under \$100K	Over \$100K
(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)	(M)	(N)	(O)	(P)	(Q)	(R)	
TOTAL	2005	251	423	682	599	135	99	97	470	1178	819	171	188	260	271	328	242	382
UNWEIGHTED TOTAL	2005	300	410	641	597	63	84	78	701	1051	725	138	188	288	293	325	226	348
TOP 2 BOX	71%	52%	66%	74%	80%	95%	75%	66%	54%	76%	77%	75%	76%	64%	66%	75%	82%	85%
			B	BC	BCD	IJKLM	I			I	I	I	I			NO	NO	NOP
Strongly approve	42%	25%	37%	46%	49%	52%	41%	39%	27%	48%	47%	49%	50%	35%	38%	45%	58%	55%
			B	BC	BC	I	I			I	I	I	I			N	NOP	NOP
Somewhat approve	29%	28%	29%	28%	32%	43%	34%	27%	27%	28%	30%	25%	26%	28%	28%	31%	23%	30%
						IJLM												
Somewhat disapprove	9%	12%	10%	8%	8%	2%	6%	13%	11%	8%	9%	10%	5%	11%	13%	8%	7%	4%
								F	FM	F	F	F		R	QR			
Strongly disapprove	16%	24%	20%	15%	10%	3%	12%	15%	25%	13%	13%	12%	17%	21%	17%	15%	11%	9%
		DE	E	E					GJKLM	F	F	F	F	QR	R			
BOTTOM 2 BOX	24%	36%	30%	23%	18%	5%	18%	28%	36%	22%	22%	22%	22%	31%	30%	23%	18%	14%
		DE	E				F	F	GJKLM	F	F	F	F	QR	QR	R		
DK/NA	4%	12%	4%	3%	2%	-	7%	6%	10%	2%	1%	4%	2%	5%	4%	2%	1%	1%
		CDE							JKLM					Q	Q		*	

Comparison Groups: BCDE/FGHIJKLM/NOPQR
 Independent T-Test for Means (equal variances), Independent Z-Test for Percentages
 Upper case letters indicate significance at the 95% level.

PIAC – Paper Billing Fees Omnibus – Aug/Sept 2013

Q10. What if instead of charging an extra fee for sending paper bills by mail, companies offered a discount to people who opt for “electronic billing”, would you strongly approve, somewhat approve, somewhat disapprove or strongly disapprove of companies doing that?

	PREFERRED BILL PAYMENT METHOD			
	TOTAL	Mostly pay by mail/in-person	Mostly Pay Online	No, I Do Not Receive/ Pay Any Bills
	(A)	(B)	(C)	(D)
TOTAL	2005	540	1003	336
UNWEIGHTED TOTAL	2005	660	938	279
TOP 2 BOX	71%	49%	83% BD	75% B
Strongly approve	42%	19%	55% BD	45% B
Somewhat approve	29%	30%	29%	30%
Somewhat disapprove	9%	14% CD	6%	8%
Strongly disapprove	16%	28% CD	10%	12%
BOTTOM 2 BOX	24%	43% CD	16%	20%
DK/NA	4%	9% C	1%	5% C

Comparison Groups: BCD
 Independent T-Test for Means (equal variances), Independent Z-Test for Percentages
 Upper case letters indicate significance at the 95% level.

Sep. 18, 2013/Page 30

PIAC – Paper Billing Fees Omnibus – Aug/Sept 2013

Q11. Some people say people should have the right to get a paper bill in the mail from a company without having to pay an extra fee and that this is part of the company's cost of doing business? Do you...?

SIZE	GENDER		AGE				REGION						CITIES				C- 100K- 99K			
	M	F	18-29	30-44	45-59	60+	ATL	QC	ON	MB/SK	AB	BC	Rest Can.	Montr eal	Toro nto	Vanco uver		Over 1 Mi.		
(T)	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)	(M)	(N)	(O)	(P)	(Q)	(R)	(S)	
TOTAL 553	2005	972	1033	387	504	582	532	143	481	768	130	213	269	1524	231	332	141	835	355	
UNWEIGHTED TOTAL 555	2005	1004	1001	156	371	655	823	252	502	500	250	250	251	1503	230	200	127	712	396	
TOP 2 BOX 84%	83%																			
Strongly agree 60%	60%	79%	86%	72%	87%	86%	83%	83%	81%	83%	83%	85%	82%	83%	77%	83%	83%	81%	83%	
			B		D	D	D													
Somewhat agree 24%	23%	22%	23%	34%	25%	20%	15%	22%	28%	20%	26%	26%	17%	21%	26%	21%	21%	24%	21%	
				EFG	G	G			JMN			M								
Somewhat disagree 9%	9%	11%	8%	21%	8%	6%	6%	9%	12%	8%	5%	9%	8%	8%	15%	10%	9%	11%	7%	
				EFG					JKMN									S		
Strongly disagree 6%	7%	8%	5%	6%	5%	6%	9%	5%	6%	8%	9%	5%	7%	7%	7%	6%	8%	6%	9%	
			C				EF													
BOTTOM 2 BOX 14%	16%	19%	13%	26%	13%	12%	15%	14%	18%	16%	14%	13%	15%	15%	22%	16%	16%	17%	16%	
			C	EFG																
DK/NA 2%	1%	2%	1%	1%	*	2%	3%	2%	*	1%	3%	2%	2%	2%	1%	1%	1%	1%	1%	
						E	E							I						

Comparison Groups: BC/DEFG/HI JKLMN/OPQ/RSTU
 Independent T-Test for Means (equal variances), Independent Z-Test for Percentages
 Upper case letters indicate significance at the 95% level.

PIAC – Paper Billing Fees Omnibus – Aug/Sept 2013

Q11. Some people say people should have the right to get a paper bill in the mail from a company without having to pay an extra fee and that this is part of the company's cost of doing business? Do you...?

	EDUCATION					EMPLOYMENT STATUS								FAMILY INCOME				
	==== TOTAL	Publ. Schl	High Schl	Coll.	Post Grad.	Home- maker	Stu- dent	Re- tired	Unemp- loyed	TOTAL Emp- loyed	Emp. Full- time	Emp. Part- time	Self Emp- loyed	Under \$30K	\$30K Under \$50K	\$50K Under \$80K	\$80K Under \$100K	Over \$100K
	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)	(M)	(N)	(O)	(P)	(Q)	(R)
TOTAL	2005	251	423	682	599	135	99	97	470	1178	819	171	188	260	271	328	242	382
UNWEIGHTED TOTAL	2005	300	410	641	597	63	84	78	701	1051	725	138	188	288	293	325	226	348
TOP 2 BOX	83%	84%	81%	82%	85%	64%	88% F	76%	84% F	84% F	86% F	81% F	83% F	78%	81%	87% N	87% N	82%
Strongly agree	60%	62%	56%	62%	61%	31%	64% F	49%	67% FHJKL	61% F	61% F	55% F	64% FH	55%	59%	61% R	68% NR	53%
Somewhat agree	23%	22%	25%	20%	24%	33% IM	23%	28% I	16%	24% I	24% I	26% I	18%	23%	22%	26%	19%	29% Q
Somewhat disagree	9%	4%	10% B	10% B	10% B	24% GIJKM	7%	12%	5%	9% I	8% I	14% I	11% I	10%	10%	8%	7%	13% PQ
Strongly disagree	7%	9%	8%	6%	5%	12%	4%	6%	8%	6%	6%	6%	5%	10%	8%	5%	6%	5%
BOTTOM 2 BOX	16%	13%	18%	16%	14%	36% IJKLM GH	11%	18%	13%	15%	14%	19%	16%	20% PQ	18%	13%	13%	18%
DK/NA	1%	3%	*%	2%	*%	-	2%	5%	3% JK	1%	1%	-	1%	2%	1%	-	-	*%

Comparison Groups: BCDE/FGHIJKLM/NOPQR
 Independent T-Test for Means (equal variances), Independent Z-Test for Percentages
 Upper case letters indicate significance at the 95% level.

PIAC – Paper Billing Fees Omnibus – Aug/Sept 2013

Q11. Some people say people should have the right to get a paper bill in the mail from a company without having to pay an extra fee and that this is part of the company's cost of doing business? Do you...?

	PREFERRED BILL PAYMENT METHOD			
	TOTAL	Mostly pay by mail/in-person	Mostly Pay Online	No. I Do Not Receive/Pay Any Bills
	(A)	(B)	(C)	(D)
TOTAL	2005	540	1003	336
UNWEIGHTED TOTAL	2005	660	938	279
TOP 2 BOX	83%	88% CD	82% D	75%
Strongly agree	60%	71% CD	59% D	47%
Somewhat agree	23%	18%	23% B	29% B
Somewhat disagree	9%	4%	11% B	12% B
Strongly disagree	7%	6%	6%	10%
BOTTOM 2 BOX	16%	10%	17% B	23% B
DK/NA	1%	2%	1%	2%

Comparison Groups: BCD
 Independent T-Test for Means (equal variances), Independent Z-Test for Percentages
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Sep. 18, 2013/Page 33

PIAC – Paper Billing Fees Omnibus – Aug/Sept 2013

Q12. If a company you regularly dealt with switched to paperless billing and charged you for getting a paper bill, would you take your business elsewhere if you could?

SIZE	GENDER		AGE				REGION					CITIES				C-				
	TOTAL	M	F	18-29	30-44	45-59	60+	ATL	QC	ON	MB/SK	AB	BC	Rest Can.	Montr eal	Toro nto	Vanco uver	Over 1 Mi.	100K-999K	
(T)	(U)	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)	(M)	(N)	(O)	(P)	(Q)	(R)	(S)
TOTAL 553	Under 99K	2005	972	1033	387	504	582	532	143	481	768	130	213	269	1524	231	332	141	835	355
UNWEIGHTED TOTAL 555	TOTAL 342	2005	1004	1001	156	371	655	823	252	502	500	250	250	251	1503	230	200	127	712	396
Yes 64%	61%	59%	61%	56%	43%	57%	62%	68%	60%	53%	61%	60%	62%	59%	60%	50%	55%	56%	54%	59%
No 30%	34%	35%	33%	37%	52%	38%	30%	24%	31%	44%	32%	33%	33%	29%	32%	46%	38%	31%	38%	34%
DK/NA 6%	6%	7%	6%	7%	5%	5%	8%	8%	9%	3%	7%	7%	6%	11%	8%	4%	7%	14%	7%	7%
									I		I			I	I			0		

Comparison Groups: BC/DEFG/HI JKLMN/OPQ/RSTU
 Independent T-Test for Means (equal variances), Independent Z-Test for Percentages
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PIAC – Paper Billing Fees Omnibus – Aug/Sept 2013

Q12. If a company you regularly dealt with switched to paperless billing and charged you for getting a paper bill, would you take your business elsewhere if you could?

	EDUCATION				EMPLOYMENT STATUS								FAMILY INCOME					
	==== TOTAL	Publ. Schl	High Schl	Post Coll.	Post Grad.	Home- maker	Stu- dent	Re- tired	Unemp loyed	TOTAL Emp- loyed	Emp. Full- time	Emp. Part- time	Self Emp- loyed	Under \$30K	\$30K Under \$50K	\$50K Under \$80K	\$80K Under \$100K	Over \$100K
	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)	(M)	(N)	(O)	(P)	(Q)	(R)
TOTAL	2005	251	423	682	599	135	99	97	470	1178	819	171	188	260	271	328	242	382
UNWEIGHTED TOTAL	2005	300	410	641	597	63	84	78	701	1051	725	138	188	288	293	325	226	348
Yes	59%	62%	65% DE	57%	56%	43%	61% FH	43%	69% HJKLM F	57% FH	57% FH	56%	60% FH	52%	62% N	61% N	56%	56%
No	35%	29%	31%	36%	38% BC	57% IJKLM G	32%	42% I	23%	37% I	37% I	39% I	34% I	42% 0	31%	35%	39%	38%
DK/NA	7%	9% C	4%	7%	6%	-	7%	15% JL	8%	6%	6%	5%	6%	6%	7%	4%	4%	6%

Comparison Groups: BCDE/FGHIJKLM/NOPQR
 Independent T-Test for Means (equal variances), Independent Z-Test for Percentages
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PIAC – Paper Billing Fees Omnibus – Aug/Sept 2013

Q12. If a company you regularly dealt with switched to paperless billing and charged you for getting a paper bill, would you take your business elsewhere if you could?

	PREFERRED BILL PAYMENT METHOD			
	TOTAL	Mostly pay by mail/in-person	Mostly Pay Online	No. I Do Not Receive/Pay Any Bills
	(A)	(B)	(C)	(D)
TOTAL	2005	540	1003	336
UNWEIGHTED TOTAL	2005	660	938	279
Yes	59%	73% CD	54%	51%
No	35%	20%	40% B	41% B
DK/NA	7%	6%	6%	8%

Comparison Groups: BCD
 Independent T-Test for Means (equal variances), Independent Z-Test for Percentages
 Upper case letters indicate significance at the 95% level.

Sep. 18, 2013/Page 36

