



Ageing, Communication, Technologies (ACT)

Listen to vulnerable consumers: Systemic abuses in the Canadian telecommunication industry

Final submission for the Inquiry on use of misleading or aggressive sales practices by large telecommunications service providers (CRTC-2018-246)

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1. Introduction

Access to telecommunications is essential for *all* Canadians. However, as submissions to the inquiry, interventions in the hearings and the Ipsos report commissioned by the CRTC collectively indicate, a staggering number of Canadians--at least 40%--have been subjected to misleading and aggressive sales practices by telecommunication service providers. As a result of these experiences the message from Canadians is loud and clear: Canadians no longer trust their telecommunications companies to give them the reliable information that they need to make informed purchases.

Telecommunications are not an option for Canadians who need access to networked communications for all aspects of their lives. Being sold costly and unsuitable services or being threatened with the withdrawal of these services affects the ability of consumers, in particular those in positions of vulnerability, to “participate meaningfully in society.”¹ This includes older low-income seniors living on fixed incomes within a shifting media landscape. In the words of the Manitoba Coalition:

A marketplace where 4 in 10 consumers -- Canadians -- I'm sorry -- report experiencing sales practices that they consider to be aggressive or misleading is a clearly -- is clearly a systemic issue, and not simply random occurrences of bad customer service. The consequences of such sales practices on all consumers, but particularly for vulnerable consumers, may threaten their ability to meaningfully participate in society²

We agree with this assessment. The findings of the Manitoba Coalition, when added to those of the Ipsos survey and to the testimonies gathered by groups throughout this inquiry, represent the voices of Canadians who are often excluded from CRTC consultations but deserve to be heard. This includes the voices of seniors. We are researchers who study the experiences of ageing in a digital world, and we most often work with seniors over the age of 70 who live in conditions of poverty. Yet seniors over 70 are least likely to have been included in Ipsos’ online survey and the least likely to have otherwise participated in this mostly digital inquiry because they are also the least likely to use the Internet regularly.³ For these reasons, seniors over 70, who constitute approximately 4.2 million Canadians, have unique and relevant histories of experience with the telecommunication industry, which must be taken into account in these hearings.

2. Understanding the terminology used by citizens

The Commissions asked many presenters at the hearing to define terms. What is misleading? What is aggression? In addition, the ACT team was asked to define the term “abusive”. Our definitions of these terms do not come only from experts or from the dictionary. They come from what actual people say about the problems that *they* encounter in their dealings with the telecommunication industry. If CRTC policy is to be useful for the people, then it must take into account how they understand these terms. As

¹ See Manitoba Coalition, CRTC Transcript October 23, 2018, Line 2425.

² See Manitoba Coalition, CRTC Transcript October 23, 2018, Line 2425.

³ See Statistics Canada, 2017. Only 43% of Canadians over the age of 75 use the Internet regularly, meaning daily or weekly.

you will see below, the terms and categories that are used to describe practices deployed against citizen/consumers are not mutually exclusive.

For the purposes of this final statement, we have chosen to define these terms drawing from both our original report, but also from the testimonies of other interlocutors at the hearing. Throughout the first two days of the public hearing, research groups, consumer groups, community organizations and citizens communicated strikingly similar messages and relayed similar stories, often using similar language. This is not merely anecdotal evidence, to be dismissed. These are *testimonies from citizens* that reveal the anguish behind the statistics and that expose the experiences of dealing with telecommunication companies. These testimonies confirm and complement the statistical data and point to a widespread problem in this industry, particularly in terms of sales practices.

2.1. Misleading sales tactics

Individual citizens and consumer advocacy groups, including ACT, reported problems in *what information* is given to citizens. Examples include information that is false, incorrect, or that fails to point out conditions within a contract. As Beaulieu Laporte clearly states, the term “misleading” encompasses “*l’offre ou à la divulgation de renseignements qui sont faux, qui sont incomplets ou qui sont hautement ambigus et donc, très susceptibles d’induire le consommateur en erreur et également, l’omission de renseignements importants*”.⁴ This can include, for example, a price increase that takes place before the end of a contract. To put a human story behind these meanings, as Shawn Ahmed recounted in his testimony “...even before my parents’ 12-month promotion was over, they too experienced a price increase”.⁵ The need to address misleading information at the point of purchase is confirmed by the study conducted by Dr. Cavanaugh’s research team at the University of Ottawa.⁶

2.2 Manipulative sales tactics

While misleading sales tactics are based on the assumption that there will be the provision of accurate and complete information by knowledgeable sales people who have the best interest of citizens and consumers in mind, manipulative sales tactics reveal the importance of understanding *how* this information is given and delivered to citizens. Tactics of manipulation can mislead citizens using practices of communication that play on the emotional states and value systems of consumers. For example, ACT reported the case of a senior being misled and manipulated into a contract for services by having sympathies played upon (“if you sign this form now, then I get to go home”). Other individuals describe being sold an expensive device while under pressure or being explained services in a manner that made them aware of their lack of knowledge. Seniors, in particular, spoke of being made to feel vulnerable when they did not fully understand a contract or the jargon being used.

As we have stated, there have been striking similarities between stories from different regions of the country. One such story that brings out the consequences of such manipulations is recounted in both Montreal and Manitoba. It is particularly relevant to seniors. In both locations recently bereaved

⁴ Anaïs Beaulieu Laporte, CRTC Transcript October 23, 2018, Line 1572.

⁵ Shawn Ahmed, CRTC Transcript October 23, 2018, Line 1134.

⁶ Mary Cavanagh, CRTC Transcript, October 23, 2018.

spouses spoke of the difficulty of getting out of a contract held by a loved one after his or her death. As Bailey recounted at the hearings *“she was just in tears. And so she left and she got her friend and they went back to the store and convinced them, but I mean to go through that type of process. And she came back and said, ‘Well, they told us that we can’t in any way show condolence or anything like that, it just has to be business.’ And that’s what I call ‘egregious’,”*⁷

2.3. Aggressive sales practices

Aggressive sales tactics put customers in a position where they are fearful, embarrassed, or ashamed and may end up signing something or committing to something in order to terminate the interaction. Aggressive tactics reported include: speaking quickly and overloading someone with information; putting a foot in the door; refusing to hang up the phone. A frequently used term to describe this aggression is *pressure*. Listen to the words of this interlocutor describing what they witnessed of the treatment of a senior: *“he ended up with a new phone and a very new, more expensive phone, and a new more expensive plan when -- and but the thing was, he felt that he had been pressured, like you know, pressured and pushed into buying -- getting the newer, more expensive phone and also the higher cost plan.”*⁸

Consumers, including seniors reported the aggressive persistence of sales representatives in these very clear ways:

... when it comes to issuing me invoices that are incorrect and demanding me to pay them even knowing that they have errors, that's aggressive. Issuing me letters that state that if I don't pay them that it could affect my credit rating, that's aggressive. Recording conversations without my consent and then refusing for me to do the same, that's aggressive”⁹

The stress of dealing with companies that use misleading, manipulative, and aggressive sales practices can have far-reaching consequences. In the words of an interlocutor at the hearing *“It’s the minute you have to call to do anything, your blood pressure jumps by about 30 points because you know you’re starting into an Olympic event.”*¹⁰ The effects of these sales tactics, which lead consumers to make deals under pressure or to purchase services so as to get out of a stressful situation are reasons why a 60 day cooling off period is needed after a contract is signed.

2.4 Predatory

Predatory sales tactics intentionally and aggressively target specific populations, or take advantage of a specific populations’ position of vulnerability in relationship to telecommunications. In our initial report, we discuss the many ways seniors are put in a vulnerable position. This is corroborated by the statements of other organizations who represented seniors at this commission including ACORN, CARP and the National Federation of Pensioners. As the latter organization put it: “The National Pensioners Federation believes that our seniors are being aggressively treated by sellers who often

⁷ Stephen Bailey, Line 921, October 22, 2018

⁸ Megan McHugh, Line 475-6, October 22, 2018

⁹ Peter Derek Hughes, Line 1233, October 22, 2018

¹⁰ Mark Loebach, Line 1491, October 22, 2018

bully them into subscribing to, or taking too large a package of services.”¹¹ Another group described how such predatory practices may take advantage of older adults, particularly those who are in the category of the “oldest old” who still need access to telecommunications services. As CARP states: “As Canadians age we can have difficulties with our hearing, our memories, and our executive function. This puts older Canadians at particular risk of misselling and makes the need for protections against predatory practices even more urgent. CARP’s over 300,000 members strongly support such protections.”¹²

2.5 Elder Abuse

The World Health Organization (WHO) defines elder abuse as “a single or repeated act, or lack of appropriate action, occurring within any relationship where there is an expectation of trust, which causes harm or distress to an older person. This type of violence constitutes a violation of human rights and includes physical, sexual, psychological, and emotional abuse; financial and material abuse; abandonment; neglect; and serious loss of dignity and respect.”¹³

The testimonies that document tactics to mislead, manipulate, aggress, pressure or prey on the vulnerabilities of populations ask us to consider these tactics from the perspective of elder abuse. Let us be clear. Not every senior has been subjected to mistreatment by the telecommunications companies of Canada, and many appreciate the good treatment that they receive, as the Ipsos survey indicates. However, it is also clear from the comments filed, the statements submitted at this hearing and from the qualitative research by Ipsos that abusive behaviours towards seniors exist. Smith reported at the hearing:

So we've got to look after each other and help each other. These poor folks come in, they're stressed, they're shaking and it's really upsetting to them. You know, if they miss a doctor appointment by 10 minutes, they're upset. So you can imagine if they're getting bills for 100 or \$200 what effect it's having on them. So that's why I'm here. That's why I spend the time and energy to come here and voice my opinion on their behalf.¹⁴

We need to take into account the toll that abuse takes. Even if we take the telecommunications companies at their word, and concede that the number is 1%, this sort of abuse perpetrated by private industry is still unacceptable. One instance of mistreatment, one instance of abuse, is one instance too many. While sales representatives and companies may not intend to be abusive, the repeated occurrence of these practices are in line with definitions of abuse, which have tangible effects on those who have the least.

¹¹ Trish McAuliffe, National Pensioners Federation, as part of the “Fair Communications Sales Coalition”, Line 1971, October 23, 2018

¹² MS. Morris, Wanda Morris, Chief Advocacy and Engagement Officer at CARP, Line 1970, October 23, 2018

¹³ World Health Organization. Elder Abuse. 2018.

¹⁴ John Smith, Lines 1245-1246, October 22, 2018

3. Contesting industry dismissals

3.1 The industry wrongly criticizes qualitative research methods

The telecommunication industry has suggested that much of the research presented at the hearing, other than their own, does not hold up to standards of methodological scrutiny. Some companies dismiss the survey by Ipsos for being unrepresentative¹⁵ while others suggest that the CCTS complaints are a more accurate representation of the volume of dissatisfaction.¹⁶ It does not come as a surprise that the telecommunication industry would downplay any and all research data that highlights the abuses that it perpetuates. It also ignores that most Canadians do not even know that the CCTS exists. The Ipsos survey revealed that only 30% of Canadians are aware of the existence of the CCTS.¹⁷

Telus, for example, has dismissed our findings because our study relies on interviews and focus groups with “only 53” seniors.¹⁸ Other companies, such as Shaw¹⁹ and Rogers²⁰, dismiss the possibility of a widespread or rampant issue. They base their rejection on the premise that these samples do not represent the Canadian consumer base. To emit such criticisms of this research is to profoundly misunderstand qualitative research, which aims to understand complex and nuanced issues in depth and to understand opinions and experiences of respondents. It also ignores the imbalance of power between community groups, citizens and university-based research teams and telecommunications companies with their teams of dedicated lawyers. Their research does not invalidate the findings of these citizen-based organizations.

Our research reveals that 75% of our respondents are impacted by misleading and aggressive sales practices. The qualitative data allows the CRTC to understand how some seniors are put in a vulnerable position in our system and it pinpoints the workarounds seniors devise to counter the abuse that have become expected and normalized. We learn, from qualitative research, the financial and emotional costs created when seniors are targeted because they are perceived as being old. Are the stories of 40 seniors, who have been victimized in dealings with telecommunications providers, to be dismissed? As we discuss in more detail below, qualitative research--and not quantitative research with large samples--is uniquely positioned to approach respondents who have been subjected to abuse. No one wants to be seen as a victim. For these reasons, such stories often only emerge through lengthy conversations with seniors when trust is regained. Other times, after fellow focus group participants speak, there is then the realization that this has also happened to them, that they are not to blame, and that they are not alone.

¹⁵ For some examples see Transcripts for Cogeco, Lines 4515-17, October 25, 2018; Québecor Média, Lines 3882-3884, October 25, 2018; Rogers, Lines 6063 - 6076, October 26, 2018; SaskTel, Lines 4317-18, October 25, 2018; TELUS, Lines 4994-4995, 5004-5007, October 25, 2018;

¹⁶ Rogers, Line 6076, October 26, 2018

¹⁷ Ipsos, 2018, p.37.

¹⁸ TELUS Communications Inc., Telecom and Broadcasting Notice of Consultation CRTC 2018-246 Report regarding the retail sales practices of Canada’s large telecommunications carriers (Reply of TELUS - Abridged). P. 7

¹⁹ Shaw, Telecom and Broadcasting Notice of Consultation CRTC 2018-246

²⁰ Rogers, Telecom and Broadcasting Notice of Consultation CRTC 2018-246

3.2 The issue of misleading and aggressive sales practices is systemic

The telecommunication industry denies that the problems reported by Canadians are systemic. They suggest, instead, that these tactics are the outcome of employees not following company protocol²¹ or that they correspond to an “access to justice” issue whereby consumers do not know how to file a complaint.²² This is wrong for two reasons. First, it puts the blame back on individuals who, as the testimonies point out, are already exhausted from the stalling tactics they encounter. Second, it absolves organizations and structures of any blame. On one hand, employees that exert predatory tactics are scapegoated as “bad apples.” On the other hand, consumers are blamed for not knowing the bureaucratically onerous methods of complaints. The industry consistently blames individuals. With other consumer groups, we maintain that the problem is systemic.

The Ipsos survey and other testimonies at the hearing strongly suggest that the issue of misleading and aggressive sales practices are alarmingly widespread in Canada. The telecommunication industry’s dismissal makes us wonder if they understand the meaning of the word systemic. Their abuse is systemic in two ways. First, the data indicates that 40% of Canadians, at a minimum, experience misleading or aggressive tactics. This is evidence that these practices are prevalent and widespread. Second, systemic refers to procedures in a system. These sales practices are facilitated and upheld by internal policies, directives and processes that have been put into place by telecommunication companies. These include undue pressures on employees to sell and retain customers, a commissions-based sale structure, a reliance on unaccountable third party sales representatives, a lack of employee training and oversight, and implicit and explicit pressure on sales personnel to target vulnerable groups (Johnson, 2018).

These conditions create incentives for employees to use aggressive and misleading sales practices to succeed in their jobs. This system puts telecommunication sales employees--many of them young adults--in positions where they are incentivized to abuse vulnerable Canadians, including seniors. The normalization of abuse, the fear felt by customers, and the general lack of trust that Canadians have towards telecommunication service providers are all evidence of the systemic nature of the problem of misleading and aggressive sales.

3.3 A stronger CCTS is not the *only* solution

We agree with the Fair Communications Sales Coalition²³ that the CCTS is not sufficiently known among the population and as such it does not fulfill its mandate. Efforts should be made to increase consumer awareness. Telecommunication companies, who have all of the resources at their disposal, should proactively inform the public of its existence and of its role. Broadcasters should be required to advertise the CCTS on radio and television. Paid advertising should be envisaged as a means of promotion.

²¹ See for instance Bell, Lines 5705-5706, October 26; Telus, Line 5252, October 25.

²² TELUS, Lines 4840, October 25.

²³ Fair Communications Sales Coalition, Lines 2119 - 2126, October 23.

That said, this is not enough. The CCTS must be considered as a transitory tool towards a better system, not a solution in itself to the problem of misleading and aggressive sales practices. Relying on a complaint mechanisms as the sole means of curbing abusive practices unfairly puts the onus on Canadians to interpret law or code of conduct, and then to follow a complicated mechanism so as to escalate issues.

It is unfair to put this burden on Canadians, including Canadians who are in a position of vulnerability. While an accessible mechanism to address complaints must be sustained and promoted, the CRTC's first focus *must remain on changing the conditions that create the complaints in the first place*. The actions of the telecommunication companies must be curbed so that complaining does not need to be a condition of fair and respectful treatment.

4. Public consultation methods and media coverage

Further to the arguments raised in our initial report, we contend that the methods employed by the CRTC to consult Canadians on the topic of aggressive and misleading sales practices have been insufficient, especially when it comes to including Canadian seniors in this process. The design of the consultation prioritizes online dissemination, digital participation, and put in place a complex commenting platform. This ensures that only Canadians with the highest level of digital skill and education are able to participate. This stifles the participation of seniors, especially seniors who are not online. For this reason, we believe like many others who participated in this hearing, that these misleading and aggressive practices are even more widespread than is captured by CRTC data.

4.1 Contextualizing the Ipsos survey

We commend the CRTC for undertaking focus groups and a survey, for the latter reveals that the problem of misleading and aggressive sales practices in the Canadian telecommunication industry is unconscionably pervasive. However, it is important to contextualize these findings, especially those that relate to seniors' experiences with telecommunication service providers.

First, while the Ipsos survey determines that 40% of Canadians have experienced misleading and aggressive sales practices, ACT and CCTS²⁴ suggest that the known cases are the "tip of the iceberg". Some 75% of our own respondents consulted using qualitative research methods identify instances of victimization. Several factors can account for this discrepancy, including the fact that our respondents have an average age of 75 years of age and many of whom have low digital skills--a group that may be made especially vulnerable in our society.

Our research team includes members of *RECAA: Respecting Elders Communities Against Abuse*, a group of older adults who with years of expertise countering elder abuse. As we have learned as communications researchers working with older adults and community organizations, stories of abuse

²⁴ See Howard Maker, CRTC Transcript, Line 33, October 22, 2018

often bring about feelings of shame in those who have been victimized. People feel compelled to hide acts of abuse for a myriad of reasons. For example, older adults may feel that disclosing they were “scammed” might raise suspicion of a cognitive decline. In our experience as mixed-method researchers, stories of abuse are not readily disclosed on an online survey or through “tick boxes”. When we conducted our research, such stories emerged after long conversations with seniors in interview settings, or after their peers had disclosed their own stories of abuse in focus group formats. For instance, the story of a woman who unwittingly signed a contract with Bell ²⁵ only emerged after 15 minutes of conversation with a researcher.

Second, the Ipsos survey finds that seniors (65+) “are less likely to have personally experienced aggressive or misleading sales practices” and are among those to report that it took place more than a year ago.²⁶ Yet, at least seven interveners other than ACT ²⁷ have suggested that seniors have been placed in a position of vulnerability in a system that profits from the lower digital skills of seniors. The fact that Ipsos was mandated to research vulnerable groups using qualitative research methods confirms our contention that surveys are not the best method to broach the topic of abusive practices with seniors. The CRTC may indeed be aware that these vulnerable populations are more willing to talk about these kinds of sales practices in a face-to-face setting, or one-on-one. As such, a discrepancy between the results obtained by quantitative methods and the qualitative research can be expected and explained.

There is also a selection bias at play in any online survey, including the Ipsos survey that may lead to the under reporting of abuses by seniors: online surveys *necessarily* exclude seniors who are not online. Seniors with low tech skills, whom we and others have argued are at a disadvantage in the current system, will be excluded from the sample if we consider that most Canadians over the age of 75 do not use the internet on a regular basis. By contrast, “nearly all Canadians under the age of 45 use the Internet every day”.²⁸ While the online survey may reach a wider swath of younger Canadians with different income and education levels, it will reach only the most educated, most affluent and most tech savvy seniors. These seniors are precisely those who, within their age cohort, we have found to be the most equipped to counter the predatory tactics of the telecommunication industry. Many of the people we interviewed for our report would not participate in the online survey or in the CRTC’s consultation. Indeed, even the most tech-savvy of seniors we interviewed faced challenges with the CRTC platform as our video of seniors attempting to use the online platform indicates (https://www.youtube.com/watch?v=ip_N_fCRNAk).

²⁵ Sawchuk, Lafontaine, & Besanger, 2018. p . 9

²⁶ Ipsos, 2018, p.7

²⁷ See Anais Beaulieu-Laporte, Line 1578, October 23, 2018; Geoff White, CCTS, Line 121, October 22, 2018; Shawn Ahmed, Line 1134, October 22, 2018; Trish McAuliffe, National Pensioners Federation, Line 1971-172, Stephen Bailey, Line 921, October 22, 2018; John Smith, Lines 1245-1246, October 22, 2018; October 23, 2018; Wanda Morris, Chief Advocacy and Engagement Officer at CARP, Line 1970, October 23, 2018.

²⁸ Statistics Canada, 2017.

4.2 Digital formats in the official record

Despite the CRTC's "digital first" mantra, there is a lack of flexibility in the formats that are allowed to appear in the official record. We hope the CRTC can make adjustments to incorporate more interventions in this inquiry. First, we encourage the CRTC to incorporate the messages that were posted on its Facebook page during its consultation, as they may represent the opinions and experiences of Canadians who were otherwise unable to participate in the consultation.

Second, we observe that the records of the tweets issued using the hashtag #CRTCForum during the set period do not reflect the actual twitter activity. Only some textual elements appear, as the retweets are excluded (the comments accompanying the retweet appear, but not the original tweets). Likewise, the images and videos that were tweeted are not included in the record. The exclusion of retweets and non-textual elements amounts to a misrepresentation of participants' use of the social media platform. The narrow use of Twitter content was not disclosed to the Twitter users at the onset, and this disclosure could have influenced their approach to participation (it surely would have influenced our approach to tweeting). We wanted to enter audio-visual data that we considered to be important. This includes the aforementioned video of two digitally literate seniors attempting to participate in the CRTC consultation, but who are unable to because of the complicated commenting platform (https://www.youtube.com/watch?v=ip_N_fCRNAk).

4.3 Media coverage

The CRTC relied exclusively on a press release to reach traditional media, which are favoured by older Canadians. This means that a highly converged media industry is tasked to disseminate the news of an inquiry that could threaten its own profit. We have observed a dearth of genuine and probing media coverage during this process from Canada's privately-owned mass media: the impact of a converged media system on this vital public issue. Except for the CBC, the *Toronto Star* and *Le Devoir*, there has been an appalling lack of in-depth media coverage at all stages of this hearing. The rare times when the issue is covered, the industry perspective is over represented.²⁹ This is an issue that is so closely tied to our ability to participate meaningfully as citizens in all aspects of society that it deserves widespread awareness. By contrast, small teams of researchers and citizens have been working to raise public awareness of this issue, and trying to reach vulnerable populations and to engage the Canadian public at large (e.g., Open Media's alternate commenting platform, our Op-Eds, many groups' outreach to the media). Unfortunately, it seems that the telecommunication industry has found that there is much to gain from the public being kept in the dark and being unengaged in the CRTC's investigation.

²⁹ See for instance the October 26 report from CTV National News <https://www.ctvnews.ca/video?clipId=1524792>

5. Conclusion

We must point out the uneven resources between the interveners in this process. Citizens, community organizations, consumer groups and research teams are using their limited budgets, time and staff to raise the public awareness on this inquiry, to participate in the process, to travel to the hearing, to conduct research, to speak to Canadians. On the one hand, they have put to used these means to represent the rights of Canadians. On the other hand, the telecommunication companies enjoy large profit margins and can employ staff to draft interventions, to sift through the data, and to criticize research while providing none of their own. These companies have the resources to defend their industry and to refute the claims of grassroots organizations.

The telecommunication industry continues to benefit financially from the widespread use of misleading and aggressive practices, which may normalize systemic abuse. It relies on a system that puts the onus on Canadians to complain because they know that few of us ever take the steps to escalate the issue to a third party, and that most of us are not even aware that a body is mandated to receive complaints. We urge the CRTC to address the issue of meaningful and aggressive sales practices, to take decisive action in curbing the abuses, and to take an active role in promoting a culture of respect in the telecommunication industry. We reiterate the recommendations from our original report to the CRTC:

- A) Abolish commissions-based model of sales.
- B) End the sales of telecommunication services through third parties that are unaccountable to the service provider.
- C) Guarantee a 60-day cooling off period, allowing consumers to opt out of any contract on the basis of the suitability of services or devices to their needs.
- D) Raise the profile of the CCTS among the general public through public awareness campaigns, using both digital and non-digital methods of communication.
- E) Implement and enforce a code of conduct for the sale of telecommunication services, with provisions for dealing with marginalized populations.
- F) Levy prohibitive fines on telecommunication companies whose sales representatives employ aggressive or misleading practices.
- G) Provide the consumer with a plain-language record of the agreement or contract at the moment of sale, including a hard copy when requested.
- H) Provide consumers with access to audio recording of sales or customer service calls.

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