

February 7, 2012

The Director of Policy & Regulation of URCA  
P. O. Box N-4860  
Nassau, Bahamas

Dear Director:

**Re: Guidelines for developing licensee Consumer Complaints Handling Procedures**

*I am submitting these comments to the above reference consultation. I am a consumer and I am a customer of BTC (land and cell telephone) and of Cable Bahamas (cable television and internet). As a customer I have had more issues with BTC with my cellphone. Many years ago I recalled having issues with my land phone and it would take a while for BTC to come and fix it, but in recent history like the last 2 years I may have one problem with my land phone and I filed my complaint on line and BTC called and got me up and running. I think it was I could not hear the phone ringing inside the house. But by and large I'd say for the last 5 years (including hurricanes) the land phone has been very reliable.*

*The cellphone experience has been different. I remember the change from TDMA to GSM caused me some grief. It was a billing issue and I had registered online. I am thinking I am paying the post-paid cell bill but I was not and BTC shut me off (you had to re-register). So I had to go in there and get that resolved. More recently (last 3 months), I couldn't make calls on a pre-paid cellphone even though I had minutes and it accepted additional minutes. So I had to go in to BTC twice to get it resolved. Of course the dropped calls and breaking up is well known.*

*With Cable Bahamas my main issue is the breaking up of the picture when you are watching it and blank channels (like Fox about early in January). The breaking up was bad in the early part of 2011; I can't say I have the problem now. The blank channel has been few and far between. I do have frequent problems with my pay-per-view. You always have to call them to reset.*

*However, my comments are based on my overall experience of customer service in the Bahamas and the need to really improve it and make companies responsive. I must say in both my interaction with BTC and Cable Bahamas the frontline people were pleasant. I suspect though it is the persons in the back who don't have the commitment to customer service and feel like when I get to I will. In the recent situation with BTC, the frontline person was dependent on the technical people to do a reset and the technical people were all in training for 2 days. So she could only leave the message and hope they'd do it when they got out of training.*

*As a consumer I don't want to have to keep calling my utility company back. I feel that once I have lodged my complaint, the utility should follow-up with me to see that the complaint has been resolved. I think they should take the information over the phone – log it as a complaint and then follow-up with me to let me know the progress (if not capable of immediate resolution) or follow-up to make sure it was resolved to my satisfaction. I don't think the customer should have to call back to say, the problem has still not been resolved or find out what's happening. The utility companies need to be proactive.*

**Question 1** - *I think the definition is a good starting point. If the company's agent is not sure whether to log it as a complaint, I think the agent should ask the customer, do you want this treated as a complaint. For instance, I might call in and ask them to explain the bill to me. What is this 20 for on my bill? After the explanation I might say to the agent, I think the description in the bill should be better or is inadequate. The question arises is this a vent or query or is this a complaint. The agent should ask me, "would you like this call to be treated as a complaint, which means that it would have to be referred to someone for consideration and a determination whether we can address this? We will then write/call you and let you know the outcome". Then I can at that time say, yes or no. I don't see why there needs to be any uncertainty – let the customer decide.*

**Question 2** – *Yes, the principles of fairness and reasonableness should guide the development of the Complaints Procedure. What other principle could there be? I am not sure why this is a question.*

**Question 3** - *Of course the complaints procedure should be available to the customer without costs. I can't understand why charging for this would even be a consideration. In order to submit your complaint we need your credit card or you have to pay \$1.00. Is that to make it a contract with third parties? The customer already has a contract and is paying for service. The complaint means you are not providing the service I requested and paid for.*

**Question 4** - *The most effective way is it should be part of the process when a customer calls in to complain that the agent indicates that there is a complaint process and the means the customer can get it. For example: Customer, "I can't make calls on my cellphone, my account is up to date or I have minutes on the phone". After the agent goes through the troubleshooting and it is resolved or it is sent to another department for rectification. The agent should indicate to the customer, that "although we have resolved your issue or sent it for remediation, you are entitled to log a complaint and the process can be located on our website, picked up at any customer service center or we can e-mail you a copy". The most effective means is during this process. The second most effective would be on the website. Bill inserts seem ineffective since a lot of times you don't get bills or people are moving to online billing. Bill inserts seems to be anti-*

environmental. Cable Bahamas can put it on their community channel and BTC can put it in their telephone directory. But the most effective is during the actual process.

**Question 5** - I guess this question relates to the filing of the complaint by the customer. I think all media. The agent on the phone should be able to take the complaint if that is what the customer wants at the time of the call. The customer should be able to fill out an online form, send an e-mail, fax a letter, mail a letter or bring in a letter. The customer should be able to come in person or by an agent and the company should have to record the complaint. The media should be as convenient to the customer as possible.

**Question 6** - I don't think this is necessary. I am only interested in the process when I have a problem. The Licensee informing me they changed the process really is not going to matter. I want to know the process when I have a problem, it is at that moment the process is important. I think the Licensee should notify URCA and if URCA thinks it is reasonable than proceed.

**Question 7** - Yes, a periodic review would seem to be reasonable, but I am not sure I'd mandate it. I think URCA should have some measure to assess how effective a licensee's complaint process is and if the Licensee is failing to meet the mark than the Licensee should be required to do a review. This would be in keeping with fair and reasonable.

**Question 8** - I think the maximum should be 10 days for a complaint to be resolved. I don't think it should be business days either. An outstanding complaint can be stressful for the customer and the aim should be to have it resolved quickly. So, there has to be some pressure on the Licensee to fix it. If it can't be resolved in 2 weeks than this needs to moved to URCA. The 10 days should also include any escalation process. These are technology companies. This is reasonable and fair to the customer.

**Question 9** - As a consumer I am not interested in categories, I want results. Maybe URCA would need this to assess the effectiveness of the Licensee and set realistic goals, but as I said in the question above after 10 days that should be the limit whatever the category.

**Question 10** - I think there should be an internal escalation process in the procedure. I think the customer should know who is the next person because the frontline person may not want to tell you, may not want to escalate (because the fault is their friend) they may forget or leave the company. The customer should still have some power to move the matter on.

**Question 11** - I think the escalation process should be included in the overall resolution process, which I am saying should be 10 days. It is not fair to on top of the 15 – 30 business days to have an escalation process. That is not a timely resolution. Can you imagine being without your phone/internet for 15 business days that is 3 weeks. If it is 30 business days then your bill

*will become due and you have to pay it while you are not getting service plus you can't complain to URCA. Then you may be subject to an escalation process. That can't be fair. Then after following the escalation process you have to go to URCA that's another process. The whole thing from beginning to end – including URCA – should be one month.*

**Question 12** – *I don't think they should conduct a public consultation. URCA should make it known and available and if people have complaints about it then URCA should be able to adapt it. Like I say, I am only concern when I have to use the process.*

**Question 13** - *I think the Licensee should upon receipt of the complaint issue a number to the customer, so that the customer can call and track it. The Licensee should also send out an e-mail acknowledging receipt of the complaint and also having the unique number on it. The Licensee should also log the complaint under the name of the customer. It would be great to have online tracking of the complaint and resolution. I know there is claims management software.*

**Question 14** - *I think URCA should require retention of records long enough for URCA to assess effectiveness or collect data. URCA should rate the companies in terms of resolving complaints by service.*

**Question 15** - *Again, I think the complaint has to be lodged quickly. 3 months is too long. Anybody waiting that long can't be serious. Once the customer becomes aware of an issue, it should be like 3 weeks max they have to complain.*

**Question 16** - *I think the Licensee should send the change to URCA. I don't think they need to get URCA's approval. If URCA sees some glaring concern then they should raise it with the Licensee. Otherwise, URCA intervention should be kept to a minimum.*

**Question 17** – *URCA should give the licensees at least 3 months and no more than 6 months to get up to the mark.*

*I hope this is a sign of things to come for consumers. There is a lot of talk about customer service as it relates to tourists or the tourists product, but charity begins at home and it's about time we learn to provide service to the locals. If that becomes ingrained that it will naturally translate to the tourists market.*

*Thank you.*

*Sincerely yours,*

*Linda Thomas*

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