

THE UTILITIES REGULATION AND COMPETITION AUTHORITY CONSUMER COMPLAINTS HANDLING PROCEDURES

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1. INTRODUCTION

1.1 General Background

The Utilities Regulation and Competition Authority (URCA) is the regulatory authority with responsibility for the Electronic Communications Sector (ECS) and the Electricity Sector (ES) within The Bahamas (collectively referred to as the "Regulated Sectors"). The ECS comprises fixed and mobile telephone services, spectrum and numbering, broadband services and broadcasting including cable and pay television. The ES encompasses the generation, distribution, transmission and supply of electricity.

URCA's legislative authority is derived from the URCA Act, 2009 and its amendments, the Communications Act, 2009 (Comms Act), the Electricity Act, 2015 (EA) and a compendium of related legislation. Together these pieces of legislation empower URCA to, *inter alia*, issue regulatory and other measures for the purpose of achieving the Government's Electronic Communications Sector, Electricity Sector, and Energy policy objectives.

This document, the Consumer Complaint Handling Procedures (CCHP), is issued under the provisions of sections 15 and 45 of the Comms Act and section 40 of the EA, which set out and mandate URCA to implement and enforce processes for the resolution of complaints between persons who seek, purchase or use services ("Consumers"), and persons who provide services to the public (Service Providers) within the Regulated Sectors.

URCA has developed the CCHP to specifically address disputes brought to URCA for resolution, consequential to unresolved complaints by Consumers regarding the services provided by Service Providers.

1.2 Objectives

This document aims to give Consumers a simple but thorough, timely and cost effective step-by-step process for the filing and handling of grievances with Service Providers in the Regulated Sectors. In addition to assisting the public in the resolution of their grievances, the CCHP will also assist URCA in identifying service areas which may need further review, particularly where it concerns the efficacy of existing regulations, and to ensure that at all times Service Providers are in compliance with regulatory measures issued by URCA. Other goals include:

- The promotion of the protection of the interest of Consumers and their right to comment and complain about their interactions with Service Providers;
- The provision of an efficient, fair and timely framework for responding to Consumers who contact URCA;
- The investigation of Complaints lodged by Consumers of Service Providers;
- A guarantee that Consumers have a right of redress in respect of their grievances with Service Providers;
- Identification of how URCA will communicate with Consumers and Service Providers concerning their Complaints;
- Regular review of complaint reports and outcomes in an effort to enable Service Providers
 to consistently review and improve their internal procedures with the objective to
 improve the quality of service ("QOS") and the handling of complaints overall; and,
- Refinement of the level of engagement between URCA and Service Providers as it relates to their provision of services to Consumers.

For URCA, complaints provide a valuable source of Consumer insight. Through the tracking and monitoring of Complaints, URCA is able to refine existing mechanisms and improve QOS delivered by Service Providers.

URCA's Complaint Handling Process, set out in the remainder of this document, is premised on the following principles:



1.3 Acronyms and definitions used in This Document

Consumer Any person who uses, may use, or requests the use of, services that are

offered by any Service Provider within the Regulated Sectors, whether for

business or residential purposes.

Communications Act 2009 and its amendments

Complaint An expression of dissatisfaction by a person about a Service Provider or its

agent's actions or lack of action, or about the standard of service provided

by or on behalf of the Service Provider.

Customer Any person who has entered into a contract with a Service Provider for the

provision of specific services in a Regulated Sector.

CCHP Consumer Complaints Handling Procedures

CPR Consumer Protection Regulations

ECS Electronic Communications Sector

ES Electricity Sector

EA Electricity Act 2016

FPC First Point of Contact

QOS Quality of Service

Regulated Sector A sector of the Bahamian economy regulated by URCA, currently

comprising the ECS and the ES

UAT The Utilities Appeal Tribunal a special court which has the jurisdiction to

hear and determine all appeals matters and disputes referred to it (concerning services or service providers within the regulated sector), and

shall have such original, appellate and supervisory jurisdiction as may be

conferred upon it by virtue of the Communications Bill (2009) or any other

act

Service Provider

An entity that provides services in a Regulated Sector

1.4 Scope and Jurisdiction

The CCHP sets out the form and manner in which complaints should be referred to URCA and

how they will be handled by URCA.

Communications received by URCA cover a myriad of areas, some of which relate to sectors not

regulated by URCA. This document addresses the procedures for the filing and processing of

Complaints as defined in section 3.6 of this document, and which pertain to services in the

following areas only:

• Fixed telephone services (including voice and data)

• Mobile telephone services (including voice and data)

Internet services

Broadcasting (excluding content complaints made pursuant to the Code of Practice for

Broadcast Content)

Electricity

However, URCA will receive, consider and record all contacts or non-complaint contacts which

pertain to the Regulated Sectors. These are referred to in this document as inquiries, referrals,

opinions and observations, or requests for information.

The CCHP does not address URCA's approach to complaints about broadcast content on radio,

television or Cable Pay TV. There is a separate URCA document that addresses the filing of

complaints against broadcasters called the Code of Practice for Broadcast Content. This

document can be downloaded from URCA's website at:

http://www.urcabahamas.bs/download/075905400.pdf.

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2 DEFINING COMPLAINTS

2.1 What is a Complaint

For the purposes of this CCHP, a Complaint is "...an expression of dissatisfaction by a person about a Service Provider or its agent's actions or lack of action, or about the standard of service provided by or on behalf of the Service Provider."

Complaints may concern any of the following services:

A.) Electronic Communications

- i. Fixed telephone services (voice and data)
- ii. Mobile telephone services (voice and data)
- iii. Internet services
- iv. Broadcasting (radio/ television/ Pay TV)

B.) Electricity

- i. Supply
- ii. Transmission
- iii. Distribution
- iv. Generation

As stated in 2.3 below, not all contacts are Complaints. While the following matters may meet the definition of Complaints, URCA will not address them under the CCHP:

- Concerns an issue that is before the Courts or has previously been dealt with; or
- A request to have a Complaint reconsidered after the Consumer has exhausted all applicable avenues for redress including referral to mediation.

Further, URCA may refuse to respond to or address complaints which URCA deems to be frivolous and/or vexing, as such Complaints may constitute a misuse of URCA's jurisdiction or waste of URCA's resources. URCA requires that in filing a Complaint under the CCHP Consumers must, to

the best of their ability, provide sufficient, accurate information that enables URCA to launch and conduct an investigation.

URCA will:

- a. Investigate all Complaints properly filed with URCA;
- b. Seek to resolve all Complaints within a specified period;
- c. Communicate regularly with the Consumer on the status of their Complaint; and
- d. Where it deems appropriate, issue appropriate directions or orders to licensees;
- e. Advise the Consumer and Service Provider in writing of URCA's decision.

2.2 Who is a Consumer

A Consumer is any person who uses, may use, or requests the use of, services that are offered by any Service Provider within the Regulated Sectors, whether for business or residential purposes.

A Customer is a person who has entered into a contract with a Service Provider for the provision of specific services in a Regulated Sector.

Any person may file a Complaint as a Consumer, but where a Complaint refers to specific services provided under a contract between a Customer and a Service Provider, the Complaint must be filed by the relevant Customer. A Customer who wishes to complain about any matter pertaining to their contract with a Service Provider, but is unable to file the Complaint, may authorize a third party to file the Complaint by providing the third party with appropriate consent in writing.

2.3 Non-Complaint Contacts with URCA

Not all contacts by Consumers are Complaints. URCA receives calls, emails and social media communication which covers a broad spectrum of concerns. These are called contacts and are further classified below. All contacts are recorded by URCA. Contacts can be made to URCA via various means, such as email, telephone, fax, social media, or by visiting URCA's office. Most contacts are handled either immediately at the Consumer's point of contact with URCA, or within 48 hours. See section 3.7 for contact details.

A. Referrals

Referrals are those contacts by Consumers which are referred by URCA back to the relevant Service Provider to allow the Service Provider the opportunity to first address the matter before it is brought to URCA. This process is in compliance with the Consumer Protection Regulations (CPR), which will apply to most Complaints pertaining to services provided within the ECS, and the CPR covering complaints about the ES.

B. Inquiries

A contact requesting verification or confirmation only, of any information or action relating to regulated services, a Service Provider, a Service Provider's decisions, or practices concerning any of the licensees in the Regulated Sectors is designated an Inquiry. Inquiries are also those contacts made by a Consumer requesting additional information, clarification or identification of the correct procedure for dealing with any issue related to the Regulated Sectors.

Consumers are encouraged to reach out to URCA to express themselves, provide observations or views about any actions, practices or terms of service of any Service Provider in the Regulated Sectors, or URCA's treatment thereof.

3. FILING COMPLAINTS

3.1 Who Should Complain

Any person or entity who receives, requests or is affected by goods and services for personal and/or business use from a supplier of those services in the Regulated Sectors or from a supplier licensed by URCA can file a Complaint. Where a Complaint relates to a specific service provided under a signed contract with a Service Provider, it will be accepted only from the relevant Customer, or a third party who is duly authorized by the Customer to do so.

3.2 Types of Complaints

A Complaint may be filed in respect of any grievance a Consumer may have with any Service Provider. Examples of grievances which may warrant a Complaint include, without limitation, the following:

- Failure to provide a service: A Complaint may be filed in respect of a request to a Service Provider for the provision of any service that is not responded to within the prescribed period of time or at all. Generally, regulatory measures implemented by URCA require that applications for service be responded to by a Service Provider within periods that range from one (1) hour, to ten (10) business days, depending on the type of service and the location of the Consumer.
- Billing: Complaints may be filed about incorrect billing, late or non-receipt of bills. Billing refers to any one, or a combination of the following activities:
 - Calculating and assembling charges incurred by a Customer during a Billing period;
 - Application of any outstanding debit, credits or discounts due against the charges;
 and calculating the net amount payable by the Customer; and,
 - Issuing and delivering Bills.
- False or misleading advertising:

- Advertising is any communication (whether written, verbal or via electronic, print
 or broadcast media) made by, on behalf of, or at the request of a Service Provider,
 which seeks to encourage, induce or entice any person or persons to purchase,
 subscribe for or obtain any Services or Products provided or supplied by the
 Service Provider.
- Wrongful disconnection of service: the termination of a consumers utility / supply by a
 Service Provider, in error
- Meter reading issues: a consumer's grievance specific to the consumption of a utility
- Disconnection/reconnection issues: matters specific to the termination and subsequent reinstatement of a utility/ supply, once the customer has satisfactorily complied with the Service Providers requirements
- Equipment damage: the loss in value or destruction of equipment, that has been provided, installed or serviced by the Service Provider
- Improper Treatment by a member of staff of a Service Provider: the degree to which a customer receives a level of disservice by a representative of a Service Provider
- Unclear or inaccessible complaint handling procedures by a Service Provider: the extent
 to which a Service Provider has made its complaint handling procedure available in clear
 and comprehensible language for all of its customers.

3.3 When to File a Complaint with URCA

3.3.1 Consumers who have a grievance against any Service Provider should first contact the Service Provider and file a complaint in accordance with the Service Provider's complaint handling procedures. URCA's regulatory measures (including the CPR in the case of the ECS) afford the Service Provider a period of no more than 30 business days within which to resolve the complaint to the reasonable satisfaction of the Consumer. URCA will not engage the Service Provider unless the Consumer can satisfy URCA that a complaint has

- been filed and the requisite 30-day period has either expired or that no reasonable satisfactory resolution was offered to the Consumer.
- 3.3.2 If a Consumer can establish that they have been unsuccessful in their genuine attempts to reach a Service Provider, the requirement to first file a complaint with the Service Provider, will be waived.
- 3.3.3 Notwithstanding the requirement to first file a Complaint with the Service Provider, URCA will use its discretion as to whether or not to investigate complaints in the absence of such a filing. Situations that would warrant the exercise of such discretion include:
 - i. Emergencies;
 - ii. A significant amount of contacts about the same issue with the same ServiceProvider; or
 - iii. No evidence of any effort made by the Service Provider to respond or resolve theComplaint; or
 - iv. The Complainant is dissatisfied with the outcome of the Complaint submitted to the Service Provider;
- 3.3.4 Service Providers are required to publicize their complaint handling procedures and contacts for complaint filing on their respective websites and social media platforms.

3.4 Before You File a Complaint

3.4.1 A Consumer who has a grievance against a Service Provider operating in the Regulated Sectors, is required to first reach out to the respective Service Provider, to file a Complaint in accordance with that Service Provider's complaint handling procedures. Each Service Provider is required to ensure that its complaint filing procedures, are visible and readily available to customers via their respective websites, social media platforms and their place of business. Regulatory measures implemented by URCA require the Service Provider to acknowledge the Consumer's Complaint within 5 business days, and then to resolve the Complaint within 30 calendar days.

3.4.2 Consumers are to follow the steps below before filing a Complaint with URCA.
Did you first contact the Service Provider about the matter, or;
Can you demonstrate an attempt to resolve the issue with the Licensee prior to contacting URCA?
Do you have all necessary documents to support your complaint?
Are you the account holder/is the service in your name?
Do you have a specific concern about a regulated service provided by a Service Provider in a Regulated Sector?
If service is not in your name, do you have the legal authority to act on behalf of the account holder?

3.5 What to Include in Your Complaint

- 3.5.1 It is the responsibility of the person filing the Complaint to ensure that all of the necessary information that would enable an investigation of the Complaint is included or provided at the time of filing to minimize unnecessary delays in the processing of the Complaint.

 All Complaints should at a minimum:
 - (i) Identify the Service Provider against whom the Complaint is being made;
 - (ii) Explain the nature and scope of the Complaint;
 - (iii) Provide an outline, including approximate dates of actions that you have taken to resolve the Complaint;
 - (iv) Highlight any actions taken and/or responses by the Service Provider related to your Complaint;
 - (v) Provide the name, telephone and/or account number relevant to the specific service in question;
 - (vi) Provide required contact details (at least one valid address for written contacts must be provided); and,
 - (vii) Where possible the Complaint should be filed on an URCA Complaint Form, which can be completed on URCA's website or can be collected from URCA's office.

3.5.2 In order for a grievance to be addressed by URCA as a Complaint, a Consumer must

provide the information set out in 3.5.1 (i), (ii), (v) and (vi).

URCA, however, mindful that some consumers may need assistance following and

complying with the service provider's complaint filing procedures, has established a

Consumer Help Desk to provide support to such consumers.

Appendix 3 provides a checklist which summarizes in bullet format the steps to ensuring

the successful filing of a Complaint.

3.6 How to File A Complaint

3.6.1 There are several methods through which Consumers may make Complaints to URCA:

Written Complaints

Written complaints should be addressed to the Chief Executive Officer, at the following

address, for the attention of the Corporate and Consumer Relations Manager:

Utilities Regulation and Competition Authority

Frederick House,

Frederick Street,

New Providence, The Bahamas

POSTAL ADDRESS: P.O. Box: N-4860

FACSIMILE: 393-0237

EMAIL: info@urcabahamas.bs

VIA WEBSITE: www.urcabahamas.bs

FACEBOOK: URCA Bahamas

Telephone Complaints

URCA maintains a dedicated hotline for receiving Consumer Complaints, which can be reached through the following telephone numbers:

Designated Consumer Hotline: 242-393-0263

Family Islands Toll Free: 242-300-URCA (242-300-8722)

In-Person Complaints

URCA has a dedicated help desk at its office in Downtown Nassau, designed to respond swiftly to Consumers who prefer to file their Complaint in person or simply make inquiries.

Utilities Regulation and Competition Authority

Frederick House,

Frederick Street,

New Providence, The Bahamas

4. FIRST POINT OF CONTACT

- 4.1. Every effort will be made by URCA to resolve Consumer Complaints and issues in the shortest time frame possible. Therefore, wherever possible, receiving and understanding a Consumer's concerns at First Point of Contact (FPC) and being able to provide a satisfactory response to the Consumer is encouraged. Contact by telephone or "walk-in" is probably the most efficient way to achieve success at FPC. The designated department within URCA and staff members in general, are empowered to discuss, respond to, and deal with simple, non-complex issues raised by Consumers.
- 4.2 Examples of complaints that may be dealt with at First Point of Contact include complaints about:
 - Channels and channel line-up (Pay Tv) why a channel is no longer available or not in its usual order:
 - Dropped calls where URCA has been notified by Service Provider as to equipment failure in certain areas;
 - Lack of certain ECS related services in certain areas; and
 - Power outages where URCA is aware of the outage.
- 4.3 The aim of FPC resolution is to provide a quick, informed response to a Complaint without having to initiate a detailed investigation into the matter. Consumers are encouraged to pursue resolution through FPC by ensuring that at the time of contact they can provide URCA with as much information as possible to support their Complaint.
- 4.4 Every grievance for which a Consumer has provided adequate information to classify the matter as a Complaint (pursuant to section 2.1 above) will be recorded by URCA and a reference number issued.
- 4.5 Where the Complaint has not been resolved at FPC, the Complaint will be acknowledged by URCA in writing within three (3) business days of receipt, advising the Consumer of the



5 THE COMPLAINT MANAGEMENT PROCESS

5.1 Acknowledgment and Review

- 5.1.1 Once a Complaint is received, it is acknowledged, then reviewed to determine if sufficient information has been provided to process the Complaint. If a decision cannot be made or there is insufficient information, the Consumer will be contacted to obtain the additional information (if contact details have been submitted with the Complaint).
- 5.1.2 If no contact details have been submitted and the information provided proves insufficient to process the Complaint, the matter will not be processed any further. If the information provided is sufficient or it is possible to obtain adequate information to process the complaint, the Complaint is categorized as a Formal Complaint and will be assigned a reference number.
- 5.1.3 Once a reference number is assigned, URCA will write to the Consumer acknowledging the Complaint, notifying the Consumer of the Complaint Reference Number, and advising of next steps.

5.2. Investigation of a Complaint

- 5.1.2 The Complaint will then go through the following process:
 - Step 1: Internal analysis this is an examination and review of the data that has been compiled, relative to the complaint. (Within 3 days of Receipt of Complaint)
 - Step 2: URCA will contact the Service Provider asking them to review and provide an explanation to both the Consumer and URCA, and any proposals for resolution of the Complaint. (Within 5 days of Receipt of Complaint)
 - Step 3: The Consumer is invited to review and respond to any explanation and proposals provided by the Service Provider. (Within 3 days of Receipt of the Service Provider's response to URCA.

- Step 4: Should the Consumer accept the explanation or in the alternative, proposal for resolution offered by the Service Provider, the matter will be marked as settled and closed in URCA's files and a written confirmation will be given to Consumer. (Within 3 days of Consumer response to Step 3)
- Step 5: Should the explanation provided by the Service Provider not be accepted by the Consumer, an investigation will be launched into the matter by URCA.

 URCA will write to the Consumer and the Service Provider to initiate the investigation. (Within 3 days of Consumer response to Step 3).
- Step 6: The Consumer will be updated periodically about the progress and status of the investigation. The investigation may require and involve further correspondence and information gathering from the Consumer and the Service Provider and other investigative measures by URCA. Upon completion of its investigation, URCA will issue its decision to the Consumer and Service Provider. The timeline of an in-depth investigation is dependent on various factors including responses from the Consumer and Service Provider, but URCA would usually expect such investigations to take between thirty (30) and ninety (90) days from inception. In its decision URCA will make any specific decisions regarding the Consumer's service, which decision brings the Consumer Complaint resolution process under this CCHP to an end. The file is marked settled and closed and a written confirmation provided to the consumer.
- Step 7: If following its investigation in Step 6, URCA reaches the view that the Service Provider was in breach of any established regulatory measures, URCA may take regulatory action against the Service Provider as it deems necessary and appropriate. The timelines for such action are subject to required regulatory processes under the relevant legislation, however URCA would expect this process to require within three (3) to six (6) months). It should be noted that any regulatory process is outside the scope of the CCHP, as it would be

intended to address the overall issue as it impacts all of the Service Providers' customers, and is therefore broader in scope than the specific Complaint.

5.3 Possible Outcomes of a Complaint

- 5.3.1 URCA will analyze and investigate all Complaints to determine whether or not there has been a breach of any regulatory obligation of the Service Provider, or any other failure by the Service Provider to meet its obligations to the Consumer. If URCA finds there has been such a breach of a regulatory or other obligation, URCA will take steps to require the Service Provider to rectify the breach or failure. Such steps may include requirements to rectify the breach and/or compensate the Consumer for any loss suffered by the Consumer as a result of the breach.
- 5.3.2. Where a Service Provider has been guilty of continuous or repeated breaches of its regulatory obligations to one or more Consumers, URCA may consider whether such breaches constitute a pervasive breach of the Service Provider's regulatory obligations or a trend which may impact the Service Provider's overall compliance with its licenses and other relevant regulatory obligations. In such circumstances URCA may consider instituting regulatory action against the Service Provider. As noted above, regulatory action is outside the scope of the CCHP.

5.4 Complaint related costs

Unless otherwise specifically determined by URCA, the parties to a Complaint will be responsible for their own costs or expenses associated with the Complaint.

6 APPEALING URCA'S DECISION

6.1 The Utilities Appeals Tribunal (UAT) is a special court which has the jurisdiction to hear

and determine all appeals matters and disputes referred to it and shall have such original,

appellate and supervisory jurisdiction as may be conferred upon it by virtue of the

Communications Bill (2009) or any other act

6.2 Any party aggrieved by a decision made by URCA in respect of a Complaint may appeal

the matter to the UAT. Contact details for the UAT are as follows:

The Utilities Appeals Tribunal

No. 11 Shirley Park Avenue

General Delivery

Nassau, The Bahamas

Telephone:

Local: (242) 323-4075/6 or 7

International: (305) 508 4671 (vibe)

Fax: (242) 356 4747

6.3 Mindful of the potential for conflicts of interest, URCA cannot provide substantive

assistance to persons seeking in respect of an appeal to the UAT in respect of its own

decision, however, URCA recognizes that some Consumers may not be fully equipped to

file and prosecute an appeal. Accordingly, URCA may upon request by a Consumer seeking

to lodge an appeal in respect of an URCA decision, procure general guidance for the

Consumer on how to make their appeal, where necessary through an independent

advisor. For the avoidance of doubt, this assistance will be in the nature of general

guidance only, and will not include legal representation of the Consumer and or financial

assistance in respect of an appeal before the UAT.

6.4 The cost of an appeal to the UAT shall be borne in full by the Complainant, unless

otherwise ordered by the UAT.

7 CONCLUSION OF COMPLAINT

- 7.1 A Consumer has the right to withdraw their Complaint at any point during the Complaint Handling Process, by advising URCA in writing. Otherwise, the Complaint process ends when URCA issues its Decision on the complaint, as set out in 5.3, which shall be issued to all parties in writing. At that time, URCA will notify the Consumer, Service Provider and any other relevant parties, of the closure of URCA's Complaint File.
- 7.2 Nothing in the CCHP shall operate to limit or exclude any legal rights or remedies of any Consumer or the access of any Consumer to the Courts or to any other appropriate dispute resolution forum.

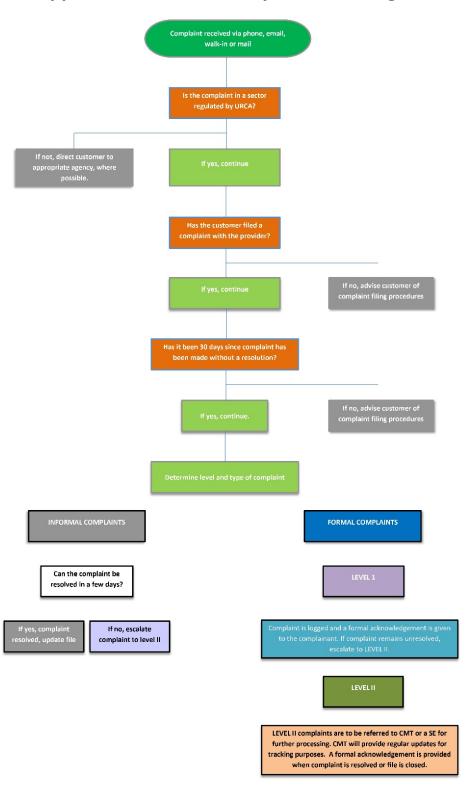
Appendix 1 - Consumer Complaint form



Consumer Complaint Form

Name:
Phone:
E-Mail:
Address:
Sector Complaint: Electronic Communications Electricity Name of Provider:
Area of Complaint: Service / Billing / Disconnection / Refund / Content / Outage / Porting / Other Details of Complaint:
(use additional sheets if necessary) Have you complained to the provider?
What is your desired outcome from the provider:

Appendix 2 - URCA's Complaint Handling Flow Chart



Appendix 3- Complaint Filing Checklist

To successfully file a Complaint with the Utilities Regulation and Competition Authority, complainants should:

