

Competition Bureau Market Study: Competition in Broadband Services



PUBLIC INTEREST ADVOCACY CENTRE
LE CENTRE POUR LA DÉFENSE DE L'INTÉRÊT PUBLIC

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Introduction

1. PIAC is pleased that the Competition Bureau is undertaking this task at the same time as the CRTC is studying “Telecommunications Sales Practices” and the Ministers of Canadian Heritage and of Innovation, Science and Economic Development Canada have named an expert panel to consider necessary legislative changes to the *Telecommunications Act*, the *Broadcasting Act* and the *Radiocommunication Act*. Hopefully the outputs from these three important initiatives as well as others taking place under the auspices of ISED and other departments will result in a comprehensive digital strategy for the communications sector in general and for the more rapid introduction of competition in broadband services going forward.
2. With respect to the Competition Bureau’s Market Study on Competition in Broadband Services, as an overarching theme, PIAC would like to see a results-oriented approach with any regulatory and/or enforcement measures having a positive impact for consumers. There should be an emphasis on price and quality of service, including speed and reliability of service. It is noteworthy that the Telecommunications Sales Practices proceeding of the CRTC is running concurrently with this process, and PIAC hopes that the Bureau and the Commission can work, if not jointly, at least in parallel pursuant to their longstanding mutual cooperation agreements.¹
3. It is no longer in any doubt that access to broadband service is a critical component of Canadian society today. In December 2016, the CRTC said that,

Modern telecommunications services are fundamental to Canada’s future economic prosperity, global competitiveness, social development, and democratic discourse. In particular, fixed and mobile wireless broadband Internet access services are catalysts for innovation and underpin a vibrant, creative, interactive world that connects Canadians across vast distances and with the rest of the world.

Canadians are using these services to find jobs, manage their investments, conduct business, further their education, keep informed on matters of public concern, consult with health care professionals, and interact with all levels of government. In general, fixed and mobile wireless broadband Internet access services improve the quality of life for Canadians and empower them as citizens, creators, and consumers... Pursuant to its legislative mandate, the Commission is establishing the following universal service objective: Canadians, in urban

¹ Interface Agreement, 22 November 1999, online at <http://www.competitionbureau.gc.ca/eic/site/cb-bc.nsf/eng/01598.html>, and Letter of Agreement between the Chairman and Chief Executive Officer of the Canadian Radio-television and Telecommunications Commission and the Commissioner of Competition of the Competition Bureau, 25 September 2013, online at <https://crtc.gc.ca/eng/com100/2013/la130925.htm>

areas as well as in rural and remote areas, have access to voice services and broadband Internet access services, on both fixed and mobile wireless networks.²

4. However, competition in broadband in Canada is not progressing at a speed that is keeping pace with the rest of the world and Canadian consumers are accordingly being placed at a disadvantage.
5. PIAC wishes to emphasize that consumer behaviour is not a key determinant but rather is a symptom of a poor market structure. The current market conditions in Canada have resulted from the underlying historical and structural issues that continue to negatively influence the market today. While behavioural economics are useful in analyzing the effects of a poor market structure, PIAC recommends avoiding a “blame the victim” approach. Rather, the Bureau should assess competition from a broader perspective and use behavioural economics as indicators of larger structural issues.

PIAC’s Analysis of Broadband Competition in Canada

6. PIAC sees four key themes with respect to broadband competition in Canada:
 - A. The Bureau should assess the historical structure of the broadband services market;
 - B. Broadband service providers must invest their profits into improving wireline services;
 - C. Consumer barriers to switching represents insufficient broadband competition;
 - D. There are indicators relating to wireline retail Internet service which should be considered as red flags.

A) The Bureau should assess the historical structure of the broadband services market

7. Historically and currently, the broadband services landscape consists of incumbent wireline operators, which were historically divided monopoly telephone territories that operated essentially without competition. Incumbent carriers have monopoly power in the provision of wholesale services, there is limited competition between them, and whatever competition exists is only as a result of regulatory requirements.
8. The CRTC found in 1994 that increasing local competition in telecommunications served the public interest.³ The Commission released Telecom Decision CRTC 97-8, Local Competition, which introduced network sharing of basic connectivity services used at

² *Modern telecommunications services – The path forward for Canada’s digital economy*, Telecom Regulatory Policy CRTC 2016-496, 21 December 2016, online at <https://crtc.gc.ca/eng/archive/2016/2016-496.htm>

³ Telecom Decision CRTC 97, Local Competition (1 May 1997), at para 4.

that time and required incumbent providers to open their networks to competitors, at a fair rate of compensation.⁴

9. In Telecom Decision CRTC 2008-17, Revised regulatory framework for wholesale services and definition of essential service, the Commission further developed and established the network sharing requirement for incumbent service providers, specifically to promote competition in ADSL Internet access services.⁵
10. In the face of rapidly increasing Internet speeds, Telecom Regulatory Policy CRTC 2010-632 affirmed that, under the network sharing regime, incumbent providers must offer wholesale Internet access services to competitors at the same speeds that they offer them to their retail customers.⁶
11. Market competition among Internet service providers is lacking in Canada, as illustrated through inordinately high market concentration, soaring customer service complaints, and Canada faring poorly as regards broadband speed and prices internationally. Independent ISPs, those who risk extinction if incumbent and cable carriers are allowed to maintain their oligopolistic market conditions, made up only 8% of the residential market share in Canada, according to the 2017 Communications Monitoring Report (CMR) published by the CRTC. Furthermore, the top 3 largest telecommunications service providers in Canada make up a stunning 83% of the total telecommunications market.⁷ Multiple observers have also noted that where there is "competition", in practice it often comes down to a choice between the one telephone carrier and the one cable carrier in the region.⁸
12. This severe lack of competition, rooted in a pre-existing regulatory model that historically favoured incumbents such as Bell, has led to Canadians paying some of the highest prices for some of the slowest broadband speeds, internationally. According to recent OECD data from September 2015, Canada is ranked 30th out of the 34 OECD countries for least expensive broadband subscriptions available at the lowest price end, and has the 6th most expensive broadband Internet access in the OECD, at the highest price end.⁹ Moreover, the 2017 Communications Monitoring Report shows that prices for Internet access services across Canada are not only rising but accelerating rapidly compared to other telecommunications services (such as home phone lines or

⁴ Telecom Decision CRTC 97-8, Local Competition (1 May 1997), at para 4.

⁵ Telecom Decision CRTC 2008-17, Revised regulatory framework for wholesale services and definition of essential service (3 March 2008), at para 76.

⁶ Telecom Regulatory Policy CRTC 2010-632, Wholesale high-speed access services proceeding (30 August 2010), at para 54.

⁷ <https://crtc.gc.ca/eng/publications/reports/policymonitoring/2017/cmr3.htm#301>

⁸ "[W]hile Canadians have a choice between cable or DSL broadband providers, there is limited choice as to which DSL or cable service they can select. Further, if a household is interested in 'bundling'...the only choice in most cities is to buy service from the single cable company or the single incumbent phone company that operates in that market." Catherine Middleton, "Structural and Functional Separation in Broadband Networks" in Marita Moll & Leslie Regan Shade, eds, *The Internet Tree: The State of Telecom Policy in Canada 3.0* (Ottawa: Canadian Centre for Policy Alternatives, 2011) 61-72 at page 63, cited in CRTC 2013-551, Reply of OpenMedia.ca (24 October 2014), at para 92.

⁹ Canada's broadband subscriptions range from \$37/month to \$173.70/month, compared to France and the United Kingdom, which range from \$33.67-\$53.52 and \$28.35-\$59.09 per month, respectively. OECD, "4.1 Fixed broadband subscription price ranges", OECD Broadband Portal (September 2014), online: <https://www.oecd.org/sti/broadband/oecdbroadbandportal.htm>.

television). Moreover, in 2015, expenditures on Internet services took the lead in terms of growth (9.6%), followed by expenditures on mobile wireless services (5.5%). These increases reflect the observed trends in subscriptions to higher Internet speeds and to mobile plans with more data.¹⁰

13. PIAC believes that the incumbents' reluctance to compete against regional players is an indication of insufficient competition in the broadband market. There are many instances where the incumbents have acquired companies instead of expanding and competing against them. BCTel and AGT merged to form Telus. Sasktel remains a provincial player, at least for now. MT&T became Aliant and was acquired by Bell. Quebec Telephone was acquired by Telus.¹¹ And more recently, for example, Bell avoided direct wireline competition through its acquisition of MTS in Manitoba.
14. Despite these acquisitions and mergers, the Commission has tried to facilitate competition amongst broadband providers. In 2015, it moved to open up competition when it issued Telecom Regulatory Policy CRTC 2015-326.¹² This seminal decision outlined the history of the broadband services market in Canada, and noted that wholesale high speed access services were required to support retail competition for services such as local phone, television, and Internet access.¹³ As such, the CRTC ordered that such services continue to be mandated but that their provision as part of an aggregated service bundle would be phased out in favour of a disaggregated model.¹⁴ Critically, the Commission requirement to implement such disaggregated wholesale high-speed access services included making them available over the fibre-access facilities of the incumbents. This combination of unbundling plus allowing small independent providers to have access to the latest fibre to the home (FTTH) builds propelled Bell to appeal the decision to the new Liberal cabinet in the fall of 2015. Fortunately, the Government backed the CRTC (and consumers) and denied the appeal.
15. Although Bell and its supporters made claims that the Cabinet denial would stifle fibre buildouts in Canada, that does not appear to have been the case. In May of this year, Bell CEO George Cope noted that fibre investments will make Bell the envy of the world in the 5G era.¹⁵ That assertion is important. If 5G adoption does become more widespread, fibre will be a necessary component of 5G service. Wireless only takes one so far...sooner or later the signals need to be backhauled and this is where access to the fibre will be so important for competitors to the incumbents.¹⁶ However, the fact

¹⁰ <https://crtc.gc.ca/eng/publications/reports/policymonitoring/2017/cmr2.htm#t203>

¹¹ https://en.wikipedia.org/wiki/Maritime_Telegraph_and_Telephone_Company, <https://en.wikipedia.org/wiki/Telus>

¹² *Review of wholesale wireline services and associated policies*, 22 July 2015, online at <https://crtc.gc.ca/eng/archive/2015/2015-326.htm>

¹³ *Review of wholesale wireline services and associated policies*, 22 July 2015, online at <https://crtc.gc.ca/eng/archive/2015/2015-326.htm>

¹⁴ *Review of wholesale wireline services and associated policies*, 22 July 2015, online at <https://crtc.gc.ca/eng/archive/2015/2015-326.htm>

¹⁵ Financial Post, 3 May 2018, online at <https://business.financialpost.com/telecom/envy-of-the-world-bces-cope-says-fibre-investment-will-pay-big-dividends-in-5g-era>

¹⁶ Meanwhile, the process of implementing the 2015 Commission decision continues. See, for example, <https://crtc.gc.ca/eng/archive/2016/2016-379.htm> (also appealed by Bell, which appeal was denied in <https://crtc.gc.ca/eng/archive/2017/2017-459.htm>).

remains that notwithstanding the supposed opening up of the broadband sector to more competition, the CRTC reports that in the most recent year for which records are available, incumbent TSPs and cable-based carriers still serve more than 87% of the Internet subscribers in Canada.¹⁷

16. Moreover, the CRTC noted in its 2015 decision that the ILECs and the Cablecos generally operate exclusively in their traditional serving territories, particularly in residential markets¹⁸ and that, in general, wholesale HSA services have not been provided voluntarily by the industry, requiring regulatory intervention to do so, and there is no convincing basis upon which the Commission could conclude that this will change in the foreseeable future.¹⁹

17. PIAC would like to see the Bureau conclude that any informal or historical regulated service territories and other structures that formerly existed are no longer acceptable excuses with regard to evidence under the *Competition Act*, and that any such arrangements be studied, questioned in the Bureau's advocacy before the CRTC and phased out. If necessary, the Bureau should challenge them before the CRTC or use them in their own investigations as potential evidence of collusion in respect of cartels.

B) Broadband service providers must invest more of profits into improving wireline services

18. Broadband service providers claim they are investing money into the improvement of wireline services, but consumers are not experiencing these "improvements." Canada Research Chair Catherine Middleton and Research Fellow Reza Rajabiun, both at Ryerson University's Ted Rogers School of Information Technology Management have noted,

The relatively low network speeds and slow deployment of next generation networks in Canada are particularly puzzling given that aggregate capital expenditures on telecommunications infrastructure and the level of platform competition in Canada have been higher than average for other high income countries (ITU, 2010; OECD, 2011a). Relatively high prices in the Canadian broadband market (OECD, 2011b) attract more investment, but the capital expenditures on telecommunications infrastructure have not yet led to the emergence of an internationally competitive broadband system in terms of connectivity speeds or the diffusion of advanced fiber networks.²⁰

19. In PIAC's view, profits from wireline services are not adequately reinvested into wireline infrastructure and services.

¹⁷ <https://crtc.gc.ca/eng/publications/reports/policymonitoring/2017/cmr5.htm>

¹⁸ *Review of wholesale wireline services and associated policies*, 22 July 2015, online at <https://crtc.gc.ca/eng/archive/2015/2015-326.htm> at paragraph 116.

¹⁹ *Ibid.*, at paragraph 121.

²⁰ Rajabiun, Reza & Middleton, Catherine, 13 October 2013, *Multilevel governance and broadband infrastructure development: Evidence from Canada*.

C) Consumer Barriers to Switching Represents Insufficient Broadband Competition

20. The CRTC prepared an online survey and published a report in 2016 in order to better understand the triggers, resources and types of information relevant to Canadians as they switch, subscribe or consider a telecommunications, Internet or television service provider²¹ The results for Internet service subscribers demonstrates that more than half of internet subscribers who have been with the same provider for over a year have not considered switching. Of respondents who had considered switching, 31% did not switch service providers because they felt that switching providers is too much of a hassle, and 27% felt the setup costs with the new provider are too expensive. Other common reasons to continue with their service provider after considering switching included the following: their current provider matched the competitor's offer (21%), competitor plans not meeting their needs (17%) or realizing they are too expensive (16%), and not agreeing with the contract terms or conditions (16%).²²
21. PIAC finds that these results indicate a limited number of broadband options for consumers, and where there appear to be options, any savings in price are not worth the hassle of switching providers. These findings are helpful in highlighting the issues consumers face in selecting a broadband provider, and are also indicative of insufficient competition in the area.
22. In conducting the survey, Internet service subscribers were grouped into the following categories: *Status Quo* subscribers, *Considerer* subscribers, *New* subscribers, *Switcher* subscribers, and *Intender* subscribers. The report outlines the following results: over half (52%) of Internet subscribers have been with the same service provider for over a year and have not considered switching (*Status Quo* subscribers). Over one fifth (21%) have considered switching their service provider (*Considerer* subscribers). Just over one tenth (11%) subscribed within the last year at their current location (*New* subscribers). One tenth (10%) switched from one provider to another within the past year (*Switcher* subscribers), and very few respondents (3%) do not have this service but intend to subscribe within the next 6 months (*Intender* subscribers). An additional 3% are not subscribed to this service.²³
23. Respondents who had been with the same provider for over a year were asked how often they considered switching from one Internet service provider to another. Over two fifths (46%) of these *Considerers* say they thought about switching once during the past year, 25% say they thought about it twice, and nearly one third (29%) say they thought

²¹ You Have Choices: Choosing a Service Provider – Online Survey Final Report, online: <<http://epe.lac-bac.gc.ca/100/200/301/pwgsc-tpsgc/por-ef/crtc/2017/034-16-e/report.html>> [CRTC Online Survey].

²² *Ibid.*

²³ *Ibid.*

about this at least three times.²⁴ Among the subscribers who have been with their service provider for at least one year but never considered switching during that year (Status Quo subscribers), results show that nearly 7 out of 10 are open to switching in the future.²⁵

24. Internet subscribers (*Considerers*) who are more likely to say they considered switching service providers at least three times include residents of Ontario (35%), married, and have a household income between \$60,000 and \$100,000 (42%).²⁶
25. For nearly one-third of *Considerers* who thought of switching service providers at least twice in the past year, a different reason seemed to be at the source of every time they considered switching (31%). For 24%, it was each time they received a bill that was higher than usual and for another 24% it was every time the service did not work as expected. Just a few felt this way every time they got a bill (8%), or because it was the end of their contract (6%). Another 8% provided other comments mostly related to high prices, wanting fibre optic technology, faster internet, or the moment when they learned of a new service provider.²⁷
26. Internet service *Considerers* are mainly focused on price (42% feel their supplier's price is too high and 21% feel they can get a better price elsewhere). *Switchers* are also as focused on price. *Considerers* and *Switchers* are also questioning their quality of service and speed (22% and 21% respectively). *New* subscribers are with a specific Internet service provider primarily because they have just moved to a new place. This is common for *Intenders* as well.²⁸
27. Respondents believe there are on average four (4) service providers in their area. One in five (20%) were not able to provide an answer. Respondents in Quebec are the most likely to say they are unaware of the number of service providers in their area (27% compared to those in Atlantic Canada (13%), Manitoba and Saskatchewan (11%), Alberta (14%), or British Columbia (17%).²⁹
28. From a demographic segment perspective, the older the respondents are, the more likely they are to speak with friends, family and coworkers and to call service providers directly to speak with a sales representative. Younger respondents (18 to 34 years old) are more likely to consider Facebook and visit government websites than older respondents.
29. Respondents were presented with a list of different types of information that a household could consider when deciding which service provider to use and which type or level of service their household could select with that service provider. Respondents were asked

²⁴ *Ibid.*

²⁵ CRTC Online Survey, supra note 21.

²⁶ *Ibid.*

²⁷ *Ibid.*

²⁸ *Ibid.*

²⁹ *Ibid.*

to rate the importance of each type of information in their decision making process. Many Internet subscribers consider the monthly price “critical” information when choosing an Internet service provider (76%) and an additional 19% consider it important. Similarly, nearly 9 in 10 Internet subscribers and intenders value information on equipment and set up costs (58% critical, 34% important), as well as information on the Internet speed in their area (58% and 34%), and how much data can be downloaded a month (56% and 32%).

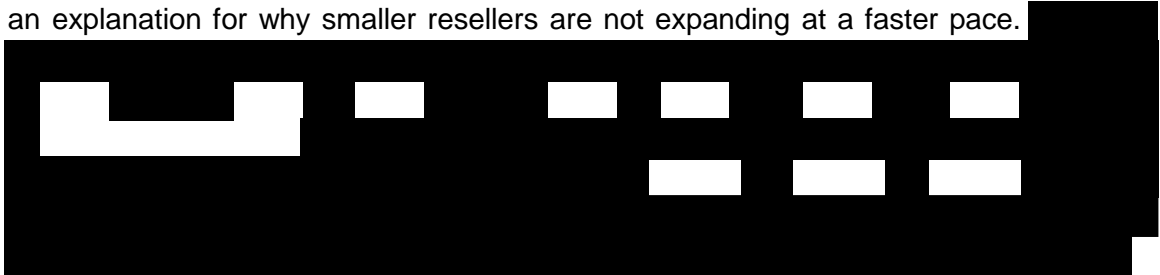
30. Although still considered at least “important” by the majority of respondents, information on the ability to package their Internet service with other services and customer reviews were considered the least important types of information among those listed in the survey.³⁰

31. *Considerers* are relatively more likely than other segments to value information on the monthly price, any service or equipment setup costs and Internet speed in their area. Similarly, these are the three most important aspects of information for *Status Quo* subscribers, *New* Subscribers and *Switchers*. Priorities for *Intenders* are knowing the Internet speed in their area, the service and equipment set up costs, and how much data they would be able to download in a month.³¹

32. Across demographic segments, respondents at least 35 years of age are more likely to value information on the service or equipment set up costs whereas younger segments are more likely to value customer reviews.³²

33. Respondents were asked to rate the extent to which it was easy or difficult to find information to help them in their decision making process to select a service provider. Overall, four in five subscribers (81%) say it was very easy (23%) or fairly easy (58%) to find the information. *New* subscribers and *Switchers* are more likely to find the process very easy (35% and 28% respectively) compared to *Considerers* (16%).³³

34. PIAC would like to reemphasize that these findings should be analyzed as effects of insufficient broadband competition, and that consumer behaviour should not be used as an explanation for why smaller resellers are not expanding at a faster pace.



³⁰ CRTC Online Survey, supra note 21.

³¹ *Ibid.*

³² *Ibid.*

³³ *Ibid.*

D) Several Markers the Wireline Retail Internet Market Lack Should be Red Flags.

35. There are no “flanker brands” for major (Bell, TELUS, Rogers, Shaw, Videotron, Eastlink) wireline (Cable or Telco-based) Internet services. Lower cost flanker brands owned by the major carriers exist in the wireless area to keep consumers from switching to an independent service. There are few such flanker services on the part of the major carriers (both Telco and Cableco) in the wireline Internet area. PIAC contends that this demonstrates that the major carriers do not perceive sufficient competitive pressure in retail wireline internet service even have to taken the defensive step they took in wireless to offer lower-cost, market-segmented sub-brands.
36. The comparative dearth of advertising of wireline Internet services (as contrasted with the advertising of the major carriers’ somewhat more “competitive” wireless services) by the major carriers offers mute testimony of the lack of need for them to “fight back” against wireline challengers. There is little need to spend money on advertising in a market which is so devoid of rivalry. This alone should raise red flags for the Bureau. In our view, the dominance in this market by the major players is structural – it is not just a result of the creative bundling of services by the large carriers (and here we note that there are other regulatory and market impediments to adding broadcasting distribution content (TV) to a bundle of telecommunications services for challengers).

Additional Issue

E) Does the current market adequately address the needs of low income consumers?

37. The ongoing process at the CRTC relating to Low Cost Data Plans is instructive. In Telecom Decision 2017-56,³⁴ the Commission made a number of determinations regarding wholesale roaming charges by Bell, Telus and Rogers. The Governor in Council sent that decision back for reconsideration by the Commission, expressing concerns regarding choice of innovative and affordable mobile wireless services on offer from those national carriers, particularly for Canadians with low household incomes.³⁵
38. Following another public process, the Commission issued a new decision³⁶ which indicated that there appeared to be a lack of choice of innovative and affordable mobile wireless services, in particular with respect to the availability of lower-cost data-only plans for consumers. This in turn caused the Commission to launch a new proceeding pursuant to Telecom Notice of Consultation 2018-98 which noted the following.

In the Commission’s view, if more options for lower-cost data-only plans were available in the market, consumers would be further empowered to use innovative applications, including voice and messaging applications, through a combination of Wi-Fi access and cellular networks.

³⁴ Telecom Decision CRTC 2017-56, 1 March 2017, Wholesale mobile wireless roaming service tariffs – Final terms and conditions, online at <https://crtc.gc.ca/eng/archive/2017/2017-56.htm>

³⁵ Order in Council P.C. 2017-0557

³⁶ Telecom Decision CRTC 2018-97, 22 March 2018, Reconsideration of Telecom Decision 2017-56 regarding final terms and conditions for wholesale mobile wireless roaming service, online at <https://crtc.gc.ca/eng/archive/2018/2018-97.htm>

Accordingly, the Commission indicated that it would initiate a public process with the goal of ensuring that lower-cost data-only plans are widely available to Canadians. Since the Commission's goal is to have these plans as broadly available as possible, the Commission considered that the focus of the process should be on the national wireless carriers, given their national wireless network coverage.³⁷

39. While the Commission determination in that matter is still outstanding, commentary from the public has been scathing. The low cost data plans offered by the Big 3 telcos have been called embarrassing, rude, a joke, outrageous, etc.³⁸ As one commentator said, "Without public oversight, of course the companies are going to charge as much as they can."³⁹

40. Although more market research on offers must be done, PIAC believes that a similar reticence to address the "low end of the market" in Internet access means there are few packages of wireline Internet or bundles that are affordable to this group of consumers.

Conclusion

41. PIAC has specifically assessed the following: **A)** The historical structure of telecommunications in Canada; **B)** The incumbents' reluctance to compete against regional carriers; **C)** The inability of Canadian consumers to find more options for broadband service; and **D)** The lack of advertising done by incumbents across Canada for broadband services, in addition to the absence of broadband flanker brands. PIAC believes that these are effects and strong indications that broadband competition in Canada is insufficient. Additionally, PIAC finds that this lack of broadband competition is not only harmful for encouraging innovation and progress of broadband access in Canada, but is also harmful to low-income Canadians who are finding it increasingly difficult to afford broadband services.

³⁷ Telecom Notice of Consultation 2018-98, 22 March 2018 Lower-cost data-only plans for mobile wireless services online at <https://crtc.gc.ca/eng/archive/2018/2018-98.htm>

³⁸ <https://www.cbc.ca/news/business/bell-rogers-telus-crtc-wireless-data-1.4643170>

³⁹ *Ibid.*

Appendix

PIAC Consumer Choice Focus Group Questions

1. What communication services do you have? Give options-such as internet/cell phone (mobile internet) /home phone/cable/email.
2. Do you think that you have a real choice when it comes to choosing service providers? No/Yes.
3. Do you have bundled communication services? No/Yes.
If Yes, what services do you have in your bundles?
4. Have you considered switching your communication service providers within the last two years? No/Yes
5. If Yes, what made you consider switching? [Give options-pricing/billing problems/quality of service/customer support/word of mouth]
If No, what made you decide not to switch? [Give options-better pricing with the current service provider/bundled services/losing discount/switching costs/lack of technical knowhow/comfortable with the current package/avoiding inconvenience in general/avoiding hassle of changing equipment and reinstallation of required equipment /fear of being without internet while making the switch/lack of awareness/lack of choice in terms of coverage limits]
6. Have you switched your communication service provider within the last two years? No/Yes
7. What factors led you to make the switch? [Give options-pricing/billing problems/quality of service/customer support/word of mouth]
8. What factors stopped from you making the switch? [Give options-better pricing with the current service provider/bundled services/losing discount/switching costs/lack of technical know-how/comfortable with the current package/avoiding inconvenience in general/avoiding hassle of changing equipment and reinstallation of required equipment /fear of being without internet while making the switch/lack of awareness/lack of choice in terms of coverage limits [Too many options- may need to reduce or divide in sub questions if we can]
9. What challenges did you face when switching communication providers? [Lack of connection/switching costs/hassle of changing equipment/lack of technical support/hassle of changing email address and updating records/felt like were locked in a contract so had to wait for it to expire]

10. Did you face any challenges in getting your previous service cancelled? No/Yes.
11. When switching providers, did you have to pay a cancellation fee? No/Yes.
Did this have any impact on your decision? No/Yes.
12. When switching providers, did you have any devices connected to your previous service provider? If yes, did you face any problems in leaving the service provider?
13. Did you face any challenges in switching communication providers arising from the need to change equipment? No/Yes
14. Does the existing regulatory framework affect your decision to switch communication providers? No/Yes

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