



Canadian Radio-television and
Telecommunications Commission

Conseil de la radiodiffusion et des
télécommunications canadiennes

Results of the fact-finding exercise on fees for paper bills



Canada 

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Background

On 3 July 2013, in response to complaints from consumers, Commission staff initiated a fact-finding exercise concerning the practice of charging consumers an additional fee for a paper copy of their bill. On that date, a letter was sent to all large and small incumbent local exchange carriers (ILECs), large broadcasting distribution undertakings (BDUs), and large wireless service providers, as well as a subset of competitive local exchange carriers (CLECs)/resellers, seeking information on the extent of the practice of charging for paper bills.¹ The purpose of the fact-finding exercise was to obtain information that would provide the Commission with a better understanding of the extent of this practice across the Canadian communications sector. Several submissions were filed with the Commission later in July 2013, with updates to the submissions being provided in November 2013.

¹ The questions asked as part of the fact-finding exercise are available on the Commission's website at the following link: <http://www.crtc.gc.ca/eng/archive/2013/lt130703.htm>. All of the submissions made by the companies are available on the Commission's website at the following link: http://www.crtc.gc.ca/otf/eng/2012/8480/b54_x.htm.

Summary - What are the key findings?

The following are the highlights of this fact-finding exercise:

- i. Some, but not all, Canadian communications companies are charging consumers for paper bills for one or more of the services that they offer.
- ii. Bell Canada, Rogers Communications Inc. (RCI), and TELUS Communications Company (TCC), three of the largest Canadian communications companies, all charge a fee for paper bills for one or more services. In contrast, Shaw Communications Inc. (Shaw), MTS Inc. (MTS), and Saskatchewan Telecommunications (SaskTel) do not charge a fee for paper bills.
- iii. Some companies only offer electronic bills, and thus do not charge paper bill fees.
- iv. Most companies that charge paper bill fees, including Bell Canada, RCI, and TCC, charge \$2 per bill per month, which amounts to \$24 annually.
- v. However, paper bill fees vary. Some companies charge \$1 per bill, whereas others charge \$4 or more per bill.
- vi. Approximately half of the respondents that charge for paper bills will voluntarily waive the fee for customers with disabilities.
- vii. A small number of respondents will waive the fee for customers without residential Internet service, seniors, or other customers on a discretionary basis. These exemptions vary widely by company.
- viii. Instead of charging for paper bills, some companies offer or have offered incentives for customers to switch to e-billing.

1. Context

The transition to e-billing is part of a bigger trend of consumers and businesses increasingly using the Internet for commercial transactions. Further, the Government of Canada is encouraging Canadians to use online government services and is using e-government (and direct deposit) to reduce costs. At the same time, not all Canadians are adopting e-commerce and e-government at the same pace.

1.1 *The Government of Canada and the digital economy*

- In Digital Canada 150, the Government of Canada stated that, by 2017, Canada will rank among world leaders in adopting digital technologies, and Canadian companies, large and small, will use digital tools to boost productivity. The Government of Canada is also building on its web presence, Canada.ca, to provide citizens with a one-stop shop for all government information and services.
 - For example, as of 2013, the Canadian Revenue Agency (CRA) no longer mails out income tax forms, directing Canadians to retrieve their forms either online or at post offices, Service Canada offices, or by phone order. The CRA also encourages consumers to file online. The Canadian Association of Retired People (CARP), among others, called on the federal government to return to mailing income tax forms,² expressing concern for those who cannot or do not feel comfortable doing their taxes online.³
- In 2012, the Government of Canada announced that it will phase out mailing government cheques by 2016 in favour of direct deposit, except for Canadians who live in remote locations with no nearby financial institutions. Other “exceptional circumstances” may also be considered. This change is expected to save the federal government \$17.4 million annually. This is also in line with the Federal Sustainable Development Strategy which includes reducing paper consumption. Canadians can use a secure online portal to get information about their direct deposits. Some seniors groups expressed concern with this change, noting that some seniors do not have bank accounts as well as the risk of increased complexity.⁴

1.2 *Home mail delivery*

- Due to declining revenues, Canada Post has increased rates and will be eliminating delivery to the home.
- As of 31 March 2014,
 - Canada Post is charging \$0.75 for Meter or Postal Indicia per standard lettermail up to 30 grams for customers with a commercial agreement;

² <http://www.carp.ca/2013/02/02/taxman-wont-go-back-to-routinely-mailing-income-tax-forms-minister-2/>

³ <http://www.carp.ca/2013/02/22/cra-is-failing-to-ensure-that-all-canadians-can-access-their-tax-forms/>

⁴ <http://www.news1130.com/2012/04/11/seniors-concerned-with-feds-getting-rid-of-cheques/> and <http://www.carp.ca/2012/12/20/need-to-know-federal-government-moving-to-phase-out-cheques-in-favour-of-direct-deposit/>

- single stamps are \$1.00 and books of stamps are \$0.85 per stamp for standard lettermail up to 30 grams; and
- the price per item for standard lettermail up to 30 grams for Canada Post customers with larger volumes of mail (500 or more) is \$0.69 each for presorted mail or \$0.70 each for mail that is not presorted.
- Canada Post will phase out urban home mail delivery starting in 2014. Various groups raised concerns about these changes noting concern for senior citizens and people with mobility issues.⁵

1.3 Charges for paper bills in other jurisdictions and industries

- The practice of charging for paper bills (or paper statements) is not unique to either the communications industry or Canada. This practice is also emerging in other industries, such as banking, and in other countries, including Australia, the U.K., and the U.S.

Other industries

- Within Canada, some banks, as well as their associated brokerages, charge for paper statements or paper stock trade confirmations, including BMO Bank of Montreal, Scotiabank, CIBC, TD Canada Trust, Laurentian Bank of Canada, RBC Royal Bank, and President's Choice Financial.
 - The fees are typically around \$2 or \$3.
 - Most banks have a basic account option which is not subject to the fee.
 - Advocacy groups expressed concerns that the banks have not made allowances for people who do not have a computer or access to the Internet.⁶
- On 27 May 2014, the Canadian Department of Finance announced that voluntary commitments had been secured from Canada's eight largest banks to offer no-cost accounts to youth, students, seniors qualifying for the Guaranteed Income Supplement, and Registered Disability Savings Plan beneficiaries. In addition, these banks will offer low-cost accounts that include basic banking services and generally limit free transactions for \$4/month. The minimum features of no-cost/low-cost bank accounts include no extra charge for deposits, debit cards, pre-authorized payment forms, and monthly printed statements.

Other countries

- Preliminary research indicates that paper bill fees are being charged in a variety of countries, including Australia (telecommunications service providers (TSPs)), the U.K. (TSPs, utilities), and the U.S. (banks, utilities).

Australia

- Australian Communications and Media Authority's (ACMA) Telecommunications Consumer Protection (TCP) Code requires that customers be clearly informed of any charges for billing in a different media (i.e. paper).
- A service provider that provides e-billing must offer at least one method of accessing bills (including e-billing) which is free of charge.

⁵ <http://www.cbc.ca/news/canada/ottawa/canada-post-to-phase-out-urban-home-mail-delivery-1.2459618>

⁶ http://www.thestar.com/business/personal_finance/2013/10/27/four_bank_service_charges_we_love_to_hate.html

U.K.

- The U.K.'s Communications Act 2003 protects certain vulnerable customers from being charged for receiving bills. General Condition 15.9, made by the Office of Communications (Ofcom) pursuant to the U.K.'s Communications Act 2003, requires providers of fixed and mobile telephone services to make bills and other information available, free of charge and in a format reasonably acceptable, to any subscriber who is blind or whose vision is impaired.
http://ask.ofcom.org.uk/help/services-and-billing/int_access
- In its [guidance on additional charges paid by customers to phone, TV, and Internet companies](#), Ofcom confirmed a threshold of £1.50 per bill related to the charges for paper bills. In the related [FAQ](#), Ofcom's set out the following: "Suppliers incur costs providing consumers with paper bills. In our view, it is reasonable for suppliers to recover those costs. However, this charge should be set fairly and in our view should only seek to recover the costs incurred in providing the bill. We do not think suppliers should charge customers more than £1.50 per paper bill."

U.S.

- Some major TSPs charge for detailed paper bills for mobile services (including Sprint, Verizon Wireless, T-Mobile US) and some smaller CLECs charge for paper bills; however, none of the major TSPs appear to charge a specific fee for summary paper bills. At least one of the larger BDUs,⁷ Bright House Networks, has a paper bill fee.⁸
- The Federal Communications Commission (FCC) does not have any rules in place related to fees for paper bills for wireless or broadband service.

1.4 Consumer adoption of e-commerce and e-billing

- Although there is a generational and income divide, a significant majority of Canadians subscribe to the Internet and many are using the Internet to transact business, as indicated below.
- The phasing out of home mail delivery by Canada Post may reinforce the movement to e-commerce and e-billing as less costly and more convenient for both consumers and businesses.

Internet penetration and use

- According to the CRTC 2013 Communications Monitoring Report:
 - In 2012, 78% of Canadian households subscribed to high-speed Internet service.⁹
 - Overall 79% of Canadian households have some form of Internet service/access.
- According to Statistics Canada:
 - Internet use by those who are 65 or older continues to increase, rising from 40% in 2010 to 48% in 2012.¹⁰

⁷ Referred to as a multichannel video service provider in the U.S.

⁸ <http://brighthouse.com/static/documents/CFL-2014.pdf>

⁹ <http://www.crtc.gc.ca/eng/publications/reports/PolicyMonitoring/2013/cmr5.htm#n11>

¹⁰ <http://www.statcan.gc.ca/daily-quotidien/131028/dq131028a-eng.htm>

- The use of the Internet by individuals in households in the lowest income quartile continues to lag, at 62%, compared with 95% of individuals living in households in the highest income quartile. In 2012, 28% of Canadians aged 65 or over in the lowest income quartile used the Internet, compared with 95% of individuals aged 16 to 24 in households in the lowest income quartile.

E-commerce and Canadians

- According to Statistics Canada:
 - 56% of Canadian Internet users ordered goods or services online in 2012, up from 51% in 2010.¹¹
 - In 2012, 72% of Canadian Internet users engaged in electronic banking (e.g. paying bills, viewing statements, and transferring funds between accounts).¹²
- According to the Canadian Bankers Association, a majority of Canadians (67%) reported using online banking in 2013 and that Internet is now the main means of banking for 47% of Canadians.¹³
- According to the CRA, it received 75% of the 2012 tax filings electronically.

¹¹ <http://www.statcan.gc.ca/daily-quotidien/131028/dq131028a-eng.htm>

¹² <http://www.statcan.gc.ca/daily-quotidien/131028/t131028a003-eng.htm>

¹³ <http://www.cba.ca/en/media-room/50-backgrounders-on-banking-issues/125-technology-and-banking>

2. Findings

2.1 Canadian communications companies that do not currently charge for paper bills

- The following companies that responded to the fact-finding exercise indicated that they do not charge for paper bills: MTS, SaskTel, Shaw, Bell Aliant Regional Communications, Limited Partnership (Bell Aliant), operating in Atlantic Canada, Câblevision du Nord de Québec inc., DMTS, KMTS, Northwestel Inc. (Northwestel), All Communications Network of Canada Co., Brooke Telecom Co-operative Limited (Brooke), CityWest Telephone Corporation, Cochrane Telephone Services, Cogeco Cable GP Inc. (Cogeco), DERYTelecom Inc., Gosfield North Communications Co-operative Limited, Hay Communications Co-operative Limited (Hay), Iristel Inc., La Compagnie de Téléphone de Lambton Inc., La Compagnie de Téléphone de St-Victor, Lansdowne Rural Telephone Co. Ltd., Mornington Communications Co-operative Limited, North Frontenac Telephone Corporation Ltd., Novus Entertainment Inc. (Novus), Ontera, Public Mobile, Quadro Communications Co-operative Inc., Roxborough Telephone Company Limited (Roxborough), Sogetel inc., Téléphone Milot inc., SSi Micro Ltd., Téléphone de St-Éphrem inc., Mobilicity, TekSavvy Solutions Inc. (TekSavvy), Tuckersmith Communications Co-operative Limited, Westman Media Cooperative Ltd., Wightman Telecom Ltd., and Xplornet Communications Inc.

(Note: On 25 October 2013, TekSavvy stopped charging paper bill fees)

2.2 Canadian communications companies that charge for paper bills

- 20 of the respondents applied a charge for all or some services provided as indicated in the table below (note that some of the respondents provided information for multiple affiliates).

Companies that charge for paper bills	Home Phone	Wireless	Internet	BDU
Bell affiliates: Bell Canada, Bell Aliant operating in Ontario and Quebec	√	√	√	√
RCI	√	√	√	√
TCC		√	√	
Distributel Communications Limited (Distributel) (1 affiliate), Fibernetics Corporation (Fibernetics)			√	
Videotron G.P. (Videotron) (only for detailed wireless bill), Eastlink, TBayTel, some Bell Canada affiliates (Bell Mobility/Solo/Virgin, Télébec, Limited Partnership (Télébec), NorthernTel, Limited Partnership (NorthernTel))		√		
Maskatel Inc., Téléphone Guèvremont Inc. (Guèvremont) (only in CLEC operating territory)			√	√
CoopTel (only in CLEC operating territory)	√		√	√
Convergia Networks Inc. (Convergia); Globalive Wireless Management Corp. (Globalive) (doing business as OneConnect Services Inc. (One Connect), WIND Mobile, and Yak Communications (Canada) Corp. (Yak)); Primus Telecommunications Canada Inc. (Primus)	√	√	√	
Bruce Telecom, Execulink Telecom Inc. (Execulink), Huron Telecommunications Co-operative Limited (HuronTel), Nexicom Telecommunications Inc. (Nexicom Telecom), NRTC Communications (NRTC), WTC Communications (WTC) (The details specifying to which services these companies apply the fee were submitted in confidence and are omitted from the report.)				

See the footnote for notes on this table.¹⁴

¹⁴ Some of the Bell Canada affiliates do not apply the charge or apply the charge to a subset of services. Bell Aliant does not apply the charge in Atlantic Canada. DMTS, KMTS, and Northwestel do not charge for paper bills at all. Télébec and NorthernTel apply the charge to wireless and Internet services only. TCC also applies the fee to bundles including Internet services with either telephone and/or television service. In general, Distributel affiliates do not provide paper bills.

- ILECs generally do not apply the charge to rate-regulated services.¹⁵
 - However, Bell Canada applies the fee to Home Phone Service in markets where the Commission regulates the rates that can be charged for local exchange telephone service. While these services are subject to a tariffed rate range, Bell Canada noted that the rate charged to the consumer plus the \$2 fee does not exceed the maximum allowed rate.
 - The small ILECs that apply the fee generally only charge it in markets where they operate as a CLEC.
 - No company applies the fee to stand-alone primary exchange services (PES).¹⁶
- See section 2.6 of the report for more detailed information concerning the companies' practices.

¹⁵ The rates that companies may charge consumers for local exchange telephone services are regulated by the Commission in those markets where the Commission has determined that there is not enough competition for market forces to protect consumers.

¹⁶ Stand-alone PES is primary exchange service (i.e. local telephone service) which is not bundled with other services, such as wireless or Internet.

2.3 What exemptions are available?

- Consumer safeguards vary; some service providers have clear policies for waiving the fee, others do not.
- 11 of the 20 respondents that charge a fee for paper bills indicated that they provide exemptions to the fees in specific circumstances, as indicated in the table below.

Company	Types of customers exempted from paper bill fees		
	Customers with disabilities / customers who require the bill in an alternative format	Customers without Internet service or email	Other circumstances (may include grandfathered customers, senior citizens, picking up the bill in person)
Bell Canada and affiliates (6 companies)	✓		✓ (grandfathered, stand-alone PES)
RCI	✓	✓	✓ (includes seniors)
TCC	✓	✓	✓ (includes seniors)
Distributel			✓ (pick up in person)
Eastlink	✓		✓
Globalive affiliates (3 companies)	✓		✓ (Yak includes seniors)
Primus	✓	✓	✓
TBayTel	✓		
Three communications companies submitted these details in confidence			

2.4 Incentives offered to encourage customers to switch to e-billing

- Some companies provide (or have provided) incentives, either ongoing or one-time, to encourage customers to switch to e-billing, as listed in the table below.

Company	Incentives used
Brooke	• A discount
Eastlink	• AIR MILES; occasional one-time credits
Hay	• A discount
MTS	• Has used contests in the past; no current incentives
Novus	• Entry into draw for a prize
Roxborough	• A discount
Shaw	<ul style="list-style-type: none"> • Have provided one-time account credits or one-time pay-per-view credits • Certain Shaw customers are eligible for a monthly \$4.00 discount if they opt for pre-authorized payment and e-billing

2.5 What is the experience for most Canadian customers?

- Most Canadians subject to the fee pay \$2 a month to receive a paper bill or \$24 a year. If a consumer subscribes to telecommunications services from more than one service provider, they could be subject to more than one paper bill fee.
- With respect to wireless services, based on the market shares of the wireless service providers,¹⁷
 - the majority of post-paid¹⁸ wireless customers could be subject to the fee, with over 90% of consumers in British Columbia, Alberta, Ontario, Quebec, and Atlantic Canada subscribing to wireless services offered by companies charging a paper bill fee;
 - as SaskTel, MTS, and Northwestel provide wireless services and do not charge for paper bills, wireless consumers in Saskatchewan, Manitoba, and Northern Canada are less likely to be subject to paper bill fees; and
 - wireless customers who use prepaid cards do not receive monthly bills and do not pay paper bill fees.

¹⁷ Based on table 5.5.5, Wireless subscriber market share, by province, 2012 from the CRTC 2013 Communications Monitoring Report

¹⁸ Post-paid wireless service is wireless service for which the customer is billed after using the services, typically on a monthly basis, based on the terms of a contract and/or on their usage. For pre-paid wireless service, the customer purchases credits in advance of using the service and therefore does not receive a monthly bill.

- Based on the wireline/cable operating territory of the companies who charge the fee, the likelihood, by region, that Canadian consumers are subject to a paper bill fee for wired services (telephone, BDU, Internet) is estimated in the table below.

Region/province (in order from most likely to be charged to least likely to be charged)	Companies
Ontario	<ul style="list-style-type: none"> Bell Canada and RCI apply paper bill fees to all services Cogeco does not charge for paper bills
Quebec	<ul style="list-style-type: none"> Bell Canada applies paper bill fees to all services TCC only charges the fee to Internet and wireless customers Videotron does not charge the fee for wireline/BDU services
Alberta, British Columbia, Atlantic Canada	<ul style="list-style-type: none"> Bell Aliant does not apply the fee in Atlantic Canada Eastlink/Bragg does not apply the fee to wireline, Internet, or BDU services MTS, SaskTel, and Shaw do not charge for paper bills RCI charges the fee for all services TCC only charges the fee to Internet and wireless customers
Manitoba, Saskatchewan, Northern Canada	<ul style="list-style-type: none"> MTS, Northwestel, and SaskTel do not charge for paper bills

2.6 Details of the practices of communications service providers charging for paper bills

The following information is as of 28 November 2013.

Company	Fee amount	Residential Services					Exemptions				Notes
		Wireline/VoIP (Local)	Wireless	Internet	BDU (TV)	Other	Disabilities	No Internet	Senior	Other	
Large ILECs and BDUs											
Bell Canada											
Bell Canada	\$2	✓		✓	✓		✓			✓ see notes	<ul style="list-style-type: none"> • Other exemptions <ul style="list-style-type: none"> - Customers who subscribe to stand-alone residential PES, on an unbundled basis, with no other services (i.e. TV or Internet) - Bell Canada residential wireline customers from before 11 December 2011 who have not added Bell Internet or Bell TV after that date - Bell Canada residential wireline customers who have switched from residential PES to Bell Canada's Home Phone service after 11 December 2011 are not grandfathered
Bell Aliant in Ontario and Quebec	\$2	✓		✓	✓		✓			✓ see notes	<ul style="list-style-type: none"> • See notes for Bell Canada
Bell Mobility/Solo/Virgin	\$2		✓				✓				<ul style="list-style-type: none"> • The fee also applies to Bell Mobility's small business customers and Bell Mobility Employee Purchase Plan customers
Bell TV	\$2				✓		✓				
NorthernTel	\$2		✓				✓				
Télébec	\$2		✓				✓				
RCI	\$2	✓	✓	✓	✓		✓	✓	✓	✓ see notes	<ul style="list-style-type: none"> • RCI uses a different billing system for business customers; business customers are not subject to the fee • The paper bill fee for wireless also applies to the Fido brand

Company	Fee amount	Residential Services					Exemptions				Notes
		Wireline/VoIP (Local)	Wireless	Internet	BDU (TV)	Other	Disabilities	No Internet	Senior	Other	
											<ul style="list-style-type: none"> • Other exemptions - “exceptional circumstances”
TCC	\$2	see notes	✓	✓	see notes		✓	✓	✓		<ul style="list-style-type: none"> • TCC has separate billing procedures for wireline and wireless customers • TCC only charges Optik TV or wireline phone service customers the fee if they have also subscribed to TCC’s Internet Service • The paper bill fee for wireless applies to all of TCC’s brands (TELUS, Koodo, PC Mobile)
Eastlink	\$2		✓				✓			✓ see notes	<ul style="list-style-type: none"> • Offers occasional incentives for wireless customers to switch to e-billing (e.g. AIRMILES or one-time credits) • As Eastlink has recently launched its wireless service, it has no formal process to address special circumstances but is looking at cases where it may need to waive the fee as part of a larger initiative to consider the special needs of certain customers
Videotron	\$3		✓ see notes								<ul style="list-style-type: none"> • Videotron only charges wireless customers who request a detailed paper bill which lists all phone calls made or received, all texts sent or received, and all data downloads and uploads • No charge is applied for a standard bill
Small ILECs (also operate as a CLEC)											
Bruce Telecom											<ul style="list-style-type: none"> • Details submitted in confidence
CoopTel	\$1	✓ see notes		✓	✓						<ul style="list-style-type: none"> • Only charges customers where CoopTel operates as a CLEC
Execulink											<ul style="list-style-type: none"> • Details submitted in confidence
Guèvremont	\$3	see notes		✓	✓						<ul style="list-style-type: none"> • Customers subscribing to bundles that include telephone service with either

Company	Fee amount	Residential Services					Exemptions				Notes
		Wireline/VoIP (Local)	Wireless	Internet	BDU (TV)	Other	Disabilities	No Internet	Senior	Other	
											Internet or TV are subject to the fee
HuronTel											<ul style="list-style-type: none"> Details submitted in confidence
Maskatel	\$3	see notes		✓	✓						<ul style="list-style-type: none"> Service bundles that include telephone with either television or Internet services are subject to the fee
Nexicom Telecom											<ul style="list-style-type: none"> Details submitted in confidence
NRTC											<ul style="list-style-type: none"> Details submitted in confidence
TBayTel	\$2		✓				✓				<ul style="list-style-type: none"> The fee applies to residential mobility customers only
WTC											<ul style="list-style-type: none"> Details submitted in confidence
CLECs/Internet service providers											
Convergia	\$1.99	✓		✓							
Distributel	\$2			✓ see notes							<ul style="list-style-type: none"> Only one affiliate of Distributel provides a paper billing option; all other affiliates offer only e-billing Can avoid the fee by picking up the bill in person
Fibernetics	\$2			✓ see notes	n/a						<ul style="list-style-type: none"> Fibernetics issues only e-bills for all services except for one exception: <ul style="list-style-type: none"> Some customers acquired in Eastern Canada from Inter.net Canada receive a paper bill
Globalive											
OneConnect	\$5.95	✓			n/a	✓ see notes	✓			✓ see notes	<ul style="list-style-type: none"> Also applies the fee to bills for long distance and data services Will waive the fee as a goodwill gesture in certain cases
WIND Mobile	\$4		✓		n/a		✓				
Yak	\$1.95	✓		✓	n/a	✓ see notes	✓		✓	✓ see notes	<ul style="list-style-type: none"> Also applies the fee to bills for long distance services Will waive the fee as a goodwill gesture in certain cases

Company	Fee amount	Residential Services					Exemptions				Notes
		Wireline/VoIP (Local)	Wireless	Internet	BDU (TV)	Other	Disabilities	No Internet	Senior	Other	
Primus	\$0.99	✓	✓	✓	n/a	✓ see notes	✓	✓		✓ see notes	<ul style="list-style-type: none"> • Applies a fee to all residential and business services including long distance and post-paid calling cards • Business customers are charged \$2 for a summary paper bill or \$2.37 for detailed paper billing • Voice over Internet Protocol (VoIP) services under the brand of Unlimitel do not provide paper billing and require e-billing • A subset of grandfathered customers receive a \$0.50 credit for selecting e-billing • Other exemptions <ul style="list-style-type: none"> - Discretionary for customers requesting accommodation due to a special requirement