



2022 06 27

To: Mr. Claude Doucet
Secretary General
Canadian Radio-television and
Telecommunications Commission
Ottawa, Ontario
K1A 0N2

Subject: **Data Collection System – Proposed Improvements**

Dear Mr. Doucet,

1. The Commission introduced the Data Collection System (DCS) in 2004 to facilitate the collection of information from Canadian broadcasting and telecommunications services, to reduce the regulatory burden on the industry in the collection of that information, and to improve the accuracy and timeliness of the data submitted.¹ As a secure and encrypted web-based system DCS was, at the time, a technologically modern solution to the issue of gathering large amounts of data from the industry. Over time, as policies and regulations have been added and/or modified, the amount of data gathered via DCS has increased exponentially. However, the technological capabilities of the system have not evolved to reflect both changes to the data collected and advances in web-based data collection technology.

2. Evanov Communications Inc., Golden West Communications, Corus Entertainment Inc., Rogers Communications Inc., Quebecor Inc. and Bell Canada (collectively, the Companies) respectfully wish to explore opportunities to improve DCS in collaboration with the Commission. Collectively we experience numerous technical and other issues – including very slow response times to data entry and form loading – that increase the administrative burden associated with completing annual returns and reports. It is our hope that the Commission will consider and ultimately adopt our proposals, which we believe will streamline and simplify the data collection process.

3. To that end, we have compiled the attached document detailing which aspects of DCS function poorly or are otherwise inefficient, along with suggested means of improvement. The document divides our issues and proposed changes into two broad categories: changes that will greatly improve the system's overall efficiency; and those that will address "bugs" that we have identified over years of use.

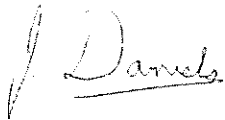
4. We recognize that while some of the proposed improvements may be easily achievable in the short term, others may require more significant system upgrades. As we do not have visibility to the system's "back-end", and are not privy to whatever plans the Commission may have in

¹ CRTC Data Collection – Guide: <https://crtc.gc.ca/eng/dcs/current/dcs2.htm>

place for technological upgrades, we propose a collaborative approach whereby our members work with the Commission to establish a roadmap to achieving greater efficiencies with DCS. In partnership, we hope to identify which upgrades are achievable in the short term, which upgrades will require more long-term approaches, and which areas may be inherent limitations of DCS and therefore in need of a different solution.

5. We thank the Commission for considering our DCS improvement proposal, and we look forward to working together to reduce the current administrative burden, optimize the data collection process, and ultimately enable us to better provide the Commission with the data necessary to achieve its policy objectives.

Sincerely,



Jonathan Daniels
VP Regulatory Law
Bell Canada



Peggy Tabet,
VP, Regulatory and Environmental Affairs
Quebecor Inc.

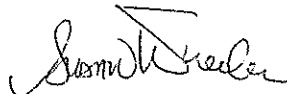


Carmela Laurignano
VP & Regulatory Affairs
Evanov Communications Inc.



Robin Hildebrand
VP – HR & Regulatory Affairs
Golden West Broadcasting Ltd.

[Signed Electronically]



Matt Thompson
VP & Associate General Counsel,
Regulatory and Public Policy
Corus Entertainment Inc.

Susan Wheeler
VP, RSM B2B, Distribution & Regulatory
Rogers Communications Inc.

Attachment

c.c.: Michael Bergeron, CRTC
The Companies

*** End of Document ***

CRTC Data Collection System (DCS): Areas for Potential Improvement

On behalf of Evanov Communications, Golden West Communications, Corus Entertainment, Rogers Communications, Quebecor and Bell Canada, we respectfully submit our request to explore opportunities to improve the DCS system. We would like to work with the Commission to improve DCS in order to simplify and streamline our reporting. We believe that the DCS could be improved by addressing DCS' shortcomings as identified below.

Opportunities for Significant Efficiency Improvements

- We would like to explore if and how the current system could process requests more quickly. The current system is extremely slow and wait times add up quickly across individual forms and across the many entities using the system. All operations take several seconds and wait times can be over a minute for tasks such as loading the forms list. Entering and exiting forms is also very time-consuming.
- We would like to discuss possible upgrades that would allow users to perform multi-form operations within DCS. For example:
 - Select several forms at a time to assign access;
 - Select several forms at a time to download;
 - Upload several forms at a time;
 - Approve several forms at a time (provided the upload process is seamless); and
 - Upload attachments (for example Rep U and Rep B, etc.) at the same time.
- We would like to review the formatting of individual forms. Currently, the forms are not user-friendly. When downloaded, column widths are far too wide and must be individually re-formatted so that all fields are viewable. This unusable formatting makes comparing multiple forms very difficult. Fixing each form manually is very time-consuming. Moreover, reformatting increases the possibility of corrupting a form.
- We would like to discuss if DCS forms can be issued sooner. Releasing the forms sooner would allow our teams to start completing them sooner and would eliminate some time pressure. It is critical that the Commission identify, as soon as possible, which forms will remain the same and where there are changes in format. A September release of forms would be a significant improvement.
- There is a need to better identify the appropriate form set for entities. The release of new forms frequently does not match the forms that were filed in the previous year. In our view, the issued forms should start with the previous year's filing and then include additions/subtractions based on any new facts. However, we frequently receive extra or missing forms or forms that are issued under the wrong corporate entity name or for entities/undertakings that are no longer in operation.
- The .xml file format is not user friendly and is prone to corruption. Once a form has been populated and saved, it does not always re-open and it is not uncommon to get an error message indicating that the file is corrupt. Moreover, .xml file uploads are not fully compatible with the DCS system templates (i.e., the web forms). Some information included in the .xml files do not translate onto the web form and must be added manually

for example, contact information and various checkmarks. We believe that exploring the use of alternative file formats may alleviate the problems identified above.

- We would like to discuss whether it is possible to improve the file uploading function in DCS. A recurring problem is that some forms simply will not upload. It may be possible to alter the system so that it is more flexible and does not require the same degree of precision. We have found that uploads sometimes fail due to benign issues such as extra spaces, too many decimals and rounding issues. Additionally, the DCS system does not adequately identify and explain the reason for an upload failure. Without the proper identification of an error, the solution requires guesswork with manual data entry as a last resort.
- We would like to explore if it is possible to combine some existing forms in order to simplify the process and make it easier to identify input errors. For example, could we combine all emergency alerting forms into one master list form? Could we create a flat file format that would allow us to populate one file per form type (for example, one master file for each of the 1020/1040/1170/1170s/1085 form etc.)? Combining some forms would eliminate the entry of repetitive data and would then make it easier to confirm that all the data has been properly entered on the form and reduce the amount of work including uploading, downloading, verification, etc. Cumulative forms, such as the 1040 for example, could have the aggregate data calculated automatically. We would only need to verify if the data matches our internal data, thus speeding up the process.
- We would like to explore whether it is possible to add new features in DCS. For example:
 - Create the ability to compare current forms to previous year's results (including automatically calculated dollar and percentage changes). Adding this information would greatly improve the verification process on our end. It would also allow us to prepare explanations for year-over-year changes in our results.
 - Build in to DCS the ability to generate aggregate reports automatically. Since the data is already in the system, it should be possible to add this functionality. This would save many hours of custom-creating aggregate returns using Excel.

Targeted Improvement Opportunities (system bugs etc.)

DCS Application Problems

- We would like to discuss some problems with the general functionality/reliability of the current tools in the DCS platform. For example, we have had times where the "filter" tool was not functioning properly to display all of the forms issued to a particular entity, etc.
- There appears to be a problem with the listing of forms within DCS. If the forms list goes over one page the list does not display properly on the 2nd (3rd, 4th, etc.) page. This frequently leads to the conclusion that forms are missing, when they are not. Additionally, we recommend that an option be included to see all forms in the forms list.
- When uploads are done, in some instances, fields are full of "junk" data and it is hard to

see the actual input – e.g. REP-Us – see below. In our view, every input field should download as a separate field on the forms.

```
<?xml version="1.0" encoding="utf-16"?><ContactInfo xmlns:xsd="http://www.w3.org/2001/XMLSchema" xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance" Type="Entity">
<LegalName>Bell Media Inc.</LegalName> <TradeName /> <Addresses> <Address Type="Main"> <Street>160 Elgin St, Suite 19</Street> <Street2 /> <City>Ottawa</City>
<CountryCode>1</CountryCode> <ProvinceCode>6</ProvinceCode> <ProvinceName>Ontario</ProvinceName> <PostalCode>K2P 2C4</PostalCode> </Address> </Addresses>
<Phones> <Phone Number="" Type="Office" /> <Phone Number="" Type="Fax" /> </Phones> <Emails> <Email Address="jonathan.daniels@bell.ca" Type="Regulatory" />
</Emails> <WebSites> <WebSite Url="www.bellmedia.ca" Type="Main" /> </WebSites> </ContactInfo>

Response Manager
Same as Entity Inbrmation No

<?xml version="1.0" encoding="utf-16"?><ContactInfo xmlns:xsd="http://www.w3.org/2001/XMLSchema" xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance" Type="Individual">
<Salutation /> <FirstName>Vivian</FirstName> <LastName>Lee</LastName> <Title /> <Company /> <Addresses> <Address Type="Main"> <Street>1800 McGill College
27</Street> <Street2 /> <City>Montreal </City> <CountryCode>1</CountryCode> <ProvinceCode>5</ProvinceCode> <ProvinceName>Quebec</ProvinceName>
<PostalCode>H3A 3J6</PostalCode> </Address> </Addresses> <Phones> <Phone Number="514-786-3488" Type="Office" /> <Phone Number="" Type="Fax" /> </Phones>
<Emails> <Email Address="vivan.lee@bell.ca" Type="Office" /> </Emails> <WebSites /> </ContactInfo>
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Form Management

- Form Assignment Process – Currently, the process for assigning forms from the response manager to the user(s) is very time-consuming. Forms can only be assigned one at a time. It would be beneficial to be able to batch assign forms to users – either by being able to select multiple forms at once, and/or by being able to assign one particular type of form or all the forms for a particular undertaking to one user (see also file downloading and uploading above).
- The *Manage Forms* page has some existing problems. Some undertakings' names appear as blank in the step 2 scroll-down menu. This is problematic when we try to add respondents because we cannot see the names of certain undertakings. Also, forms for previous years should be deleted from the *Manage Forms* page. These forms clutter the page and respondents don't have access to them anyway.



- The forms list should have the due dates listed. Currently, to check and monitor when forms are due, the user must enter the form to see the due date. The due date should be added as one of the columns on the forms list. It would also help to have the sector name identified.

File Layout Issues

- We should consider adding additional detail to filename formats. For example, including standard information such as form #, province, BDU name, BDU ID #, broadcast year, etc. This detail would save users having to re-name each file and would allow for much easier sorting.
- We should consider adding label descriptors within each form (i.e. form #, province, BDU, BDU ID, broadcast year). Forms could have this information at the top of the form and in the header or footer, so that every page can be identified when printing.

Form Errors

- We should consider removing some/all defined cells. Existing forms give some cells a distinct name. This is a problem because cells cannot be easily copied and you cannot drag equations when pulling them from calculation workbooks or pulling the report to make year-over-year comparisons. The user is required to manually add the equation in each cell. We recommend that the names be removed and the cell be left blank.
- Calculated totals do not add correctly for some forms when downloaded. The formulas are missing in some of the row and column total fields when the form is downloaded so the totals don't update as data is input.
- The inclusion of merged cells within the forms is problematic. The transfer of information from working files to the DCS forms is not easy because of merged cells in the forms. The presence of merged cells forces the user to manually input one cell at a time. Eliminating merged cells and using a flat file format might make it easier to populate the forms.

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