

BAHAMAS TELECOMMUNICATIONS COMPANY LTD., (“BTC”)
Code of Consumer Complaints Handling Procedures

**Relating to the Processing and Recording of
Consumer Complaints.**

Final Version: 15 October, 2012

Introduction

This Code of Consumer Complaints Handling Procedures (“Code”) is intended to provide the principles and procedures to address Customer complaints and to facilitate the Bahamas Telecommunications Company Ltd., (“BTC”)’s compliance with the Statement of Results and Final Determination on the Guidelines for Developing Consumer Complaints Handling Procedures (ECS/16) issued by the **UTILITIES, REGULATION AND COMMUNICATIONS AUTHORITY (“URCA”)** on June 6th 2012. This Code takes into account the legal and regulatory environment in The Bahamas and will be amended or revised as needed with the evolution of the telecommunications environment to ensure that BTC is delivering effective and efficient service and processing of Complaints.

In this Code “We” “Us” “Our” and “BTC” refer to the Bahamas Telecommunications Company Ltd., and “You” and “Your” refer to the Customer.

As a utility company regulated by (“URCA”), the electronic communications services that the Bahamas Telecommunications Company Ltd., (“BTC”) provides are governed by the consumer protection ambit of (“URCA”), pursuant to the Communications Act 2009 and BTC’s Individual Operating Licence. BTC is also governed by the Consumer Protection Act, and the Data Protection (Privacy of Personal Information) Act 2003.

You may locate this Code, Our General Terms and Conditions, Privacy Policy and Acceptable Usage Policy, and Our Customer Acceptance Agreement on the reverse side of your Customer Application form, online at [www.btcbahamas.com/Policies Procedures and Complaints](http://www.btcbahamas.com/Policies_Procedures_and_Complaints). Copies of this Code are available at no cost to You from Our Customer Care Department, Our Retail Stores or online at [www.btcbahamas.com/Policies, Procedures, and Complaints](http://www.btcbahamas.com/Policies,Procedures,andComplaints)

1. Purpose of this Code

This Code is intended to benefit Customers using the services of the Bahamas Telecommunications Company Ltd., (“BTC”) in the Commonwealth of The Bahamas who have entered into an Agreement with Us. Your agreement with Us sets out the legal Terms and Conditions and Policies governing both You and BTC.

2. Who is not a Consumer for the purposes of this Code?

This Code does not relate to complaints received from Internet Service Providers (ISPs) or Other Licensed Operators. Any complaint received from these entities should be routed immediately to Carrier Services, in the Legal Regulatory and Carrier Services Division of BTC.

3. Objective of a Consumer Complaints Handling Process

From a regulatory perspective, the objective of a complaints handling process is to speedily and fairly resolve Your issues without a need to involve the Regulator, attorneys at law or the Attorney General’s Office. The solution provided by Us to You and the approach taken by Us will be fair and reasonable and, We commit to the efficient and timely resolution of Your complaints.

4. Importance of records

Your records are maintained by Us pursuant to the laws of the Commonwealth of The Bahamas. You agree that We may communicate with You via electronic means and that Our communications with You satisfy any legal requirement that they be in writing. The availability of Your records is important because:

- a. these will often form the basis of Our investigations into Your complaint; and, they will also assist in timely investigations.

5. Right to Lodge a Complaint

You have a right to complain should You have concerns about Our Services. The reporting of Your complaint is necessary as a measure of the quality of service We provide to You. In this Code You will find:

- a. How to make a complaint
- b. How to contact Us
- c. How to seek independent advice

6. Definition of Complaints

- a. A Complaint is “an expression of dissatisfaction” made by You to Us related to either:
 - (i) how we provide Our Services to You; or
 - (ii) the complaints handling process itself.
- b. A complaint means that a response or resolution is expected.
- c. A Complaint is not:
 - (i) A request for information;
 - (ii) Frivolous or vexatious calls: these calls should be reported to the authorities;
 - (iii) A general enquiry;
 - (iv) A fault report.

7. How to make a Complaint

Complaints may be written, oral or by email. They can be addressed to Us in different forms and may arrive by different channels. If You have complaint concerning any aspect of Our service, You can contact Us by telephone toll free at 242-225-5282, fax, letter, email, by social media or on Our website. You may also choose to lodge Your Complaint in person at any of Our Retail Stores, Our Contact Centre, or at Our Administrative Offices at #21 John F. Kennedy Drive in New Providence.

To contact Us you may write to:

Customer Care Department,
c/o Patricia Walters,
Head of Customer Services and Operations,
Bahamas Telecommunications Company Ltd.,
#21 John F Kennedy Drive,
P O Box N 3048,
Nassau, New Providence,
Email: Patricia.Walters@btcbahamas.com
Phone: 242-302-7428
Fax: 242-322-9140
Hours of Operation: 9:00am – 5:00pm, Monday – Friday.

Or, complaints@btcbahamas.com

8. Content of Your Complaint

Your complaint should be sent to Us within sixty (60) business days after the occurrence of an incident and should include at a minimum:

- a. Your name or the name of the person acting on Your behalf;
- b. Your mailing address, post office box, phone number, email contact, etc
- c. The nature of the complaint and Your account number with Us;
- d. The date complaint is filed;
- e. The product or service that You are complaining about;
- f. Any supporting documentation relating to the Complaint; e.g. bill statements, service contracts or agreements, written correspondence, reports or other evidence related to the complaint.
- g. The requested remedy.

9. Stages of the Complaint Handling Process

The stages of the complaints handling process are not overly prescriptive:

- a) Initial Contact by the Customer
- b) Acknowledgement of receipt of the complaint in writing by the company
- c) Investigation of the complaint
- d) Notification of Resolution of the Complaint
- e) Internal Escalation
- f) Any other additional stages
- g) Final communication of resolution to Customer.

10. Resolving Your Complaint

- a. The Customer Care Department personnel will start the investigation of Your complaint immediately upon receipt.
- b. We will formally acknowledge receipt of Your Complaint within five (5) business days of its receipt and will provide you with a reference number. We aim to respond to Your complaint within fifteen (15) business days from the receipt of Your Complaint. Please refer to Your Customer Acceptance Agreement at [www.btcbahamas.com/Policies Procedures and Complaints](http://www.btcbahamas.com/Policies_Procedures_and_Complaints).
- c. We will make every effort to complete the investigation within thirty [30] business days of receipt of the Complaint.
- d. We will inform You if any of the timeframes cannot be met and a new timeframe within which You can expect to receive a response from Us.
- e. We will notify You of the resolution, decision or any action taken regarding Your Complaint in writing as soon as is reasonably possible.
- f. Your complaint is resolved when:
 - (i) You indicate in writing to Us that You no longer wish to pursue the Complaint;
 - (ii) We have agreed a course of action which, if taken would resolve or remedy the Complaint to Your satisfaction;
 - (iii) We have taken action to rectify or remedy the issue and, it is reasonable to consider that as a result of Our actions You are no longer dissatisfied.
- g. We will retain Your complaint and all documents and written records collected from You throughout the complaints handling process for one (1) year after the resolution of the Complaint (whether resolved by Us or by URCA).

11. Internal Escalation:

If you are dissatisfied with the way in which Your Complaint is handled during Your initial contact with BTC, You may escalate Your complaint to:

- a. The Manager of the Customer Services and Operations Department;
- b. The Head of Customer Services and Operations;
- c. The Senior Vice President of Commercial and Family Islands Division;
- d. The President and Chief Executive Officer.

Once You have followed Our internal escalation process, if We are unable to resolve Your Complaint to Your satisfaction, You may refer Your complaint to URCA at www.urcabahamas.bs

12. Unresolved Complaints

We aim to resolve Your complaint in the timeframes stated. After a full investigation, the following details will be retained by Us:

- a. Number of complaints outstanding for more than ten (10) business days.
- b. Number of complaints received by category in the period being reported and cumulative for the year to date.
- c. Percentage of complaints resolved within the target time.
- d. Number of complaints unresolved and referred to URCA.

13. Standard Responses

As far as possible, Our responses to You should take the form of standard form letters. These standard letters are detailed in Appendix 2 attached and are subject to amendment or revision from time to time.

14. Updating the Code

As this Code takes into account the legal and regulatory environment and considers Our business needs, it will be necessary to amend or revise the Code from time to time. Once any amendments are made the revised Code will be re-issued noting the revised date, and the actual revisions. The re-issued Code will be posted on Our website along with its re-issue date. The provisions of this Code and any significant revisions will be approved by URCA.

Appendix 1

Customer Complaint Reporting Form

All information must be completed on this form.

Customer Details

Name	
Telephone Number	
Account Number <i>(and telephone number as applicable)</i>	
Address:	
P O Box Number:	
Customer's Authorized Representative: <i>(Name and Address inclusive of Telephone, Email and P O Box Number)</i>	
Customer's Email Address:	
Date Complaint filed:	
Complaint Reference Number:	
Immediate Action Taken: (if any)	
Possible Due Date for Response to Complaint:	
Requested Remedy:	
Supporting Documentation enclosed: <i>(including but not limited to Customer Agreement, emails or other correspondence related to the complaint).</i>	
Additional Information:	

Complaint Type

	Fixed Line	Mobile	Internet	International	Other
Billing					
Provision of Service					
Credit Control					
Customer Service					
Directories					
Pay phones					
Phone Cards					
Other (as applicable)					

(Tick category(ies)(as appropriate))

(N.B. Our team will read the information above to You to ensure that the complaint form is complete. All form are to be returned to Customer Service upon completion.)

Complaint Details

Summary Description:

Additional Information:

Appendix 2

Standard Responses (section 13)

To: [The Customer]

From: [BTC]

RE: COMPLAINT – REFERENCE NUMBER XXX

Dear Sir/Madam,

We acknowledge receipt of Your complaint received by Us on [day/month/year] via [email/letter/social media/in person/telephone]. We apologize to You for any inconvenience that You may be experiencing at this time.

We have commenced Our investigations into Your complaint and will revert to you within five [5] business days of the receipt of Your complaint. We will make every effort to resolve Your complaint within thirty (30) business days of receipt of Your complaint. If we are unable to meet the timelines outlined, We will provide You with a new timeframe within which You can expect to receive a response from Us.

We appreciate Your business and look forward to serving you again.

Yours faithfully,