

Office of the Director of
**Telecommunications
Regulation**

Dispute Resolution Procedures: Consultation Paper

Document No. ODTR 99/13

March 1999

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1. Introduction

Following the liberalisation of the Irish telecommunications market on 1st December, 1998, the marketplace is open for the Irish consumer to receive the benefits that a competitive environment can deliver. While the key date of liberalisation was a very important milestone in the development of the Irish telecommunications market, this one act will not in itself ensure that all users of telecommunications services reap the rewards it so clearly has the potential to deliver. Another area requiring action is the effective and timely resolution of disputes. Disputes in the telecommunications market can hinder the development of competition, or delay the provision of innovative services or/and reductions in prices. The Director believes that a formal mechanism needs to be put in place to resolve such issues and invites comments on a proposed procedure in this consultation document.

In considering this issue the Office is mindful of the different categories of complaints and levels of dispute that may arise and need to be addressed. Some range from disputes involving an individual customer with their service provider to inter-operator disputes, particularly operators designated as having significant market power (“SMP”). In developing a dispute handling process the Director wishes to ensure that it is fair, transparent and equally applied, timely, and appropriate to the dispute in hand.

The following paper (Section 7) sets out a proposed dispute handling process.

All comments are welcome, but it would make the task of analysing responses easier if comments reference the relevant question numbers from this document. In order to promote further openness and transparency the ODTR will publish responses received to this consultation paper, excluding commercially sensitive information. Where material that is commercially sensitive is included in a response, this should be clearly marked as such and included in an Annex to the response.

This consultative document is not a legal document and does not constitute legal, commercial or technical advice. The Director is not bound by it. The consultation is without prejudice to the legal position of the Director or her rights and duties to regulate the market generally.

2. Structure of Paper

This paper is structured as follows:

- Section 3 details this consultation procedure and timetable;
- Section 4 provides some background to dispute handling procedures in the telecommunications sector prior to liberalisation;
- Section 5 summarises the legislative basis for the development of a disputes handling procedure by the ODTR;
- Section 6 refers to dispute resolution procedures within Telecoms Companies;

- Section 7 describes the scope of the dispute handling process proposed in this paper and outlines the proposed procedure;
- Section 8 outlines the follow-up action being proposed at this time;
- Annex 1 details the dispute resolution options available to consumers at present;
- Annex 2 is a draft Dispute Resolution Request Form, which details the procedures and information required in respect of a request to this office to intervene in a dispute.

3. Consultation Procedure and Timetable

The consultation period will run from 18th March to 29th April, 1999. Comments should be submitted in writing before 5.00pm on April 29th to:

Peter McKenna,
The Office of the Director of Telecommunications Regulation,
Abbey Court,
Irish Life Centre,
Lower Abbey Street,
Dublin 1

Or

Via email to mckennap@odtr.ie

The Director intends to issue her response to this consultation during May, 1999 which will include the final text of the Dispute Resolution Procedure Guidelines.

4. Background

In considering how best to approach this issue, two main sources of disputes have been identified. In short they are;

- disputes involving customers and operators, and
- inter-operator disputes (in particular between OLO's and operators with significant market power).

Historically there have been a range of mechanisms in place to cater for consumer complaints. Annex 1 to this document details the mechanisms that are currently available to consumers. Operator related disputes are a more recent phenomenon and have in the past been dealt with on a more informal/ad hoc manner.

The liberalisation of the telecoms market and the increase in the number of new operators providing services to end-users impact on the handling of both categories of complaints. The Director believes there is a need for the structures for handling

consumer complaints to be re-examined in the light of these changes. There has been some limited debate on this subject to date and the Director looks forward to the development of this debate. This paper concentrates on the handling of disputes of a regulatory nature where the Director has a statutory role to play.

Complaints of a Regulatory Nature

At present there is no formal, documented dispute handling procedure in place for disputes relating to breaches of licensing or regulatory conditions. Since the introduction of alternative telecoms service providers in 1992 complaints have been dealt with on a case by case basis, without any formal process for affected parties to follow, i.e. application, time periods etc varied from case to case. In all cases, prior to the establishment of the ODTR, such complaints were dealt with by the Regulatory Division of the Department of Public Enterprise. The relevant functions were transferred to the Director from 30 June 1997 which is now the appropriate body to handle such disputes.

The scope of disputes to be handled by the ODTR is determined broadly by the relevant legislation. The EU Directives and national legislation covering the need for the provision of a mechanism for the resolution of such disputes and these are referred to in the following section. It is clear that the successful resolution of such disputes in a timely and efficient manner is the key driver for ensuring competition flourishes in the telecommunications sector and that the benefits of that competition accrue to the consumer. The procedure proposed in Section 7 is designed to provide such a mechanism.

The proposed procedure is designed to be simple, easy to use and applicable to as wide a range of circumstances as possible. However, the Director is of the view that certain issues should be dealt with outside the scope of the proposed process. In the following areas, alternative mechanisms for the handling of disputes are either in place already or are being separately developed. The proposed procedure will not therefore apply to these categories at this time:

Type of Dispute	Reason
Cable/MMDS related disputes	A new licensing scheme is currently being developed for these services and networks. It is considered more appropriate that a dispute resolution procedure be developed separately in the context of the new licences.
Advertising related issues	The Advertising Standards Authority of Ireland is mandated to investigate such disputes.
Radio Interference	Because of the nature of such complaints, a very specific approach must be taken. For example the complainant may not be aware of the source of the problem, or there may be implications for safety of life services. It is intended therefore that such issues will continue to be dealt with as at present

Questions

1. *Is the scope of the proposed procedures appropriate? If not why?*
2. *Are there other issues which should/may fall outside the scope of the proposed procedures?*
3. *Are there other issues that should/may be included in the scope of the proposed procedures?*

5. Legislative Background

General

Both national and EU legislation recognise the importance of dispute resolution procedures – those involving incumbents and OLO's and those involving Operators and consumers. There is a range of legislative provisions designed to address these issues, mostly by mandating the establishment of procedures to deal with such disputes. In many cases, national legislation transposes EU Directives. In certain instances, the national legislation may not yet be in place, and the EU legislation is referred to directly in this section.

The dispute resolution procedures proposed in this paper are designed to comply with this complex range of legislation, while at the same time providing simple, timely and inexpensive remedies for affected parties.

Specific functions of the Director as set out in legislation include:

- Dealing with appeals regarding the termination of voice telephony services by TE¹ and in the future, by operators providing fixed public telephone networks and voice telephony services²
- Dealing with complaints about the voice telephony service of TE³ and in the future the service of operators providing fixed public telephone networks and/or services⁴
- Handling disputes between operators in relation to interconnection⁵
- Dealing with complaints about leased line services by operators that have been designated as having SMP in the leased lines market⁶

Currently Telecom Eireann is the only organisation that has been designated as having Significant Market Power in the fixed telephone market and the leased lines market⁷.

¹ Regulation 6(2) of the European Communities (Application of ONP to Voice Telephony) Regulations, SI No. 445 of 1997, Regulation 6(2) (transposing Directive 95/62/EC)

² Article 22 of Directive 98/10/EC on the application of ONP to Voice Telephony, (to be transposed)

³ Regulation 25 of the European Communities (Application of ONP to Voice Telephony) Regulations, SI No. 445 of 1997, (transposing Directive 95/62/EC)

⁴ Article 26 of Directive 98/10/EC on the application of ONP to Voice Telephony, (to be transposed)

⁵ Regulation 10(8) & 16 of the European Communities (Interconnection in Telecommunications) Regulations, SI No. 15 of 1998, (transposing Directive 97/33/EC)

⁶ Regulation 11 of the European Communities (Leased Lines) Regulations 1998, SI No. 109 of 1998, (transposing, *inter alia*, Directive 97/51/EC)

⁷ Decision Notice D4/98 on Significant Market Power

Detailed Legislative Background

This section sets out in detail the legislative provisions summarised above. The proposed procedure is designed to address each of the legislative provisions:

European Communities (Application of Open Network Provision to Voice Telephony) Regulations, SI No. 445 of 1997

These Regulations transpose Directive 96/52/EC which was designed to apply the principles of open network provision (ONP) to the provision of voice telephony services by incumbent operators. The legislation is designed for a pre-competitive era where one operator had been granted special or exclusive rights in the telecommunications market. It is therefore specifically addresses disputes relating to services provided by Telecom Eireann only. This Directive has since been superceded by Directive 98/10/EC to deal with an open competitive market. National legislation has not yet been finalised to transpose the new Directive.

- Regulation 6(2) provides that users shall have a right of appeal to the Director regarding the date of termination of service by Telecom Eireann, where TE decides to withdraw a particular service.
- Regulation 25 requires the Director to establish dispute settlement procedures, which shall be, in principle, inexpensive, and which shall facilitate the resolution of disputes in a fair, transparent and timely manner. The dispute settlement procedures are applicable to disputes concerning alleged infringements of the provisions of the Regulations. Those provisions apply to the voice telephony service provided by Telecom Eireann.

European Communities (Interconnection in Telecommunications) Regulations, SI No. 15 of 1998

These Regulations transpose Directive 97/33/EC and are directed towards ensuring that telecommunications companies can and do interconnect their networks for the purposes of providing services and access to services to end users.

- Regulation 10(8) provides that in an Interconnection dispute between organisations, the Director, at either party's request, shall take steps to resolve the dispute within six months of the request being made, and the resolution shall represent a fair balance between both parties' legitimate interests.
- Regulation 12(2) states that in a facility sharing dispute between organisations the Director, at either party's request, may intervene to resolve such a dispute and the same timescale as that for interconnection disputes shall apply.
- Regulation 16 provides that in respect of complaints about interconnection involving organisations in more than one Member State, operators can refer the dispute to the Director for resolution. The Director must then resolve the dispute within six months.

European Communities (Leased Lines) Regulations, SI No. 109 of 1998

These Regulations transpose Directive 95/51/EC and a number of other Directives, with a view to adapting the legislative regime to an liberalised environment where no one operator has exclusive or special rights in relation to the provision of leased lines. The legislation provides that the Director may designate an organisation as having Significant Market Power in the market for leased lines and the provisions of the Regulations shall apply to that Operator. The Director has designated Telecom Eireann as having SMP in the leased lines market.

- Regulation 11 states that the Director shall establish procedures for dealing with complaints about the leased line services of operators designated as having SMP in the leased lines market. The procedures should include time limits for filing complaints and resolution.

Directive 98/10/EC on the application of Open Network Provision to Voice Telephony and on Universal Service for Telecommunications in a Competitive Environment

This Directive repeals Directive 95/62/EC to cover the liberalised environment where no one operator has exclusive or special rights in relation to the provision of voice telephony services. The national legislation transposing this Directive into Irish law has not yet been signed, but when it is available, it is expected to replace the provisions of SI 445 of 1997 (see above). Obligations are placed on operators providing fixed public telephone networks and/or services, with additional obligations on operators with SMP in the fixed market. The Director has designated Telecom Eireann as having SMP on the fixed telephone market in accordance with SI No. 15 of 1998.

- Article 21 requires Member States to adopt measures to warn subscribers of impending service interruption as a result of non-payment of bills for use of the fixed public telephone network.
- Under Article 22 NRAs must ensure that termination of offerings or significant alteration thereof may only be done after consultation with affected users, and affected users may bring the issue to the attention of the NRA.
- Article 26 provides that any party may bring cases before the NRA or an independent body, under procedures which are, in principle, inexpensive, to resolve disputes in a fair, transparent and timely manner.

Telecommunication Licence Conditions

In designing a licensing regime for the liberalised telecommunications market, the Director had regard to the importance of customer care arrangements and dispute resolution procedures. A condition was therefore included in Basic (Condition 5.9) and General Telecommunications Licences (Condition 6.9) requiring all operators to implement an appropriate code of practice for the resolution of customer complaints. The condition states:

“The Licensee shall implement an appropriate code of practice for the resolution of customer disputes and in relation to non-payment of bills and disconnection. The Director may from time to time issue directions to the Licensee specifying any modifications or additions that she considers should be made to the code or as to the publication, republication, implementation or further modification of the code. The Licensee agrees to participate in good faith in any dispute resolution procedure established by the Director for the resolution of disputes.”

Questions

4. *Do you agree that the proposed procedures address the various legislative requirements? If not why?*
5. *What amendments do you think are necessary to comply with the legislative requirements and why?*

6. Dispute Resolution Procedures within Telecoms Licensees

As mentioned above the ODTR has included in both the Basic and General Telecommunications Licences a condition imposing an obligation on all licensees to put in place a code of practice for the resolution of customer complaints. This was a requirement in the application process for licences, and the Director is pleased to note that all licensees currently have such a code of practice in place. The Director believes that, in the liberalised market, customer care will become a key differentiation factor for competing operators and this will benefit the consumer. It is therefore important that OLO’s fully implement their own customer care programs to resolve disputes brought to their attention by their customers.

Another key tool in the resolution of disputes is Service Level Agreements (“SLA”). Such agreements normally set out a standard of service to be achieved and provide for remedies in the case of failure to achieve such targets. This type of mechanism is particularly appropriate to inter-operator disputes. Allied to this, the collection and publication of performance measurement data may prove a useful tool in encouraging service standards that avoid disputes in the first instances. The ODTR will be reviewing these issues with industry in the near future and has already begun to collate data for a number of forthcoming consultation exercises including consultations on:

- Performance Indicators and publication of data;
- Service Levels Provided to OLO’s by Licensees with SMP

However the Director recognises that despite the best efforts of parties to a dispute to resolve the matter, there will be cases where the parties concerned may not reach agreement. It is intended that the Dispute Resolution procedures proposed in Section 7 will present such parties with a further opportunity to reach a settlement and the

procedure is designed to complement, where possible, licensees' own internal dispute resolution procedures.

(Licensed operators are also referred to the Office of the Ombudsman (website: www.irlgov.ie/ombudsman) which has a guide to internal disputes systems).

7. Dispute Resolution Procedure

1.1 Introduction

The Director believes that individual licensees internal customer care programs should be fully utilised before a dispute is referred to the ODTR. However, as already identified, there may be cases where, despite best endeavours, an agreement on a particular issue cannot be reached. The availability of an independent third party at this stage may represent the best means of finding a resolution. The proposed procedures set out hereunder are designed to provide a means of finding such a resolution.

In order to assist the ODTR in managing this process a certain level of information will be required of the complainant. The more details that are provided, the clearer the picture will be for the case officer assigned to assist in this process and the more speedily the issue may be resolved.

1.2 Alternative mechanisms

While the procedure set out below will be followed where appropriate the Director is mindful of the role that less formal procedures may play in resolving disputes. In particular the ODTR offers an independent mediation or facilitation service to parties where it is felt that such a course of action would be more effective in reaching a speedy resolution to a dispute. In such cases, the Office will appoint an independent facilitator for a time limited period, to assist the parties' in voluntarily resolving the issue between them. This service is without prejudice to the parties individual or collective rights.

Parties to a dispute can also contact this office on a less formal basis than that proposed under Step 1 where it is felt that this may be more appropriate to a particular situation. In such cases, the ODTR may be in a position to provide clarification or assistance to the parties that would assist them in resolving the matter bi-laterally.

1.3 Detailed Dispute Resolution Procedure

The Director proposes various timescales in the procedures set out below. However, it should be noted that she reserves right to extend the time-scales proposed in exceptional circumstances. This may include issues which arise which require a more wide ranging debate or consultation in order to find a more appropriate solution.

Step 1

The complainant contacts the ODTR (by writing or email) using the prescribed form in Annex 2. The party requesting dispute resolution (complainant) will be requested to provide the following information

- The parties to the dispute and contact details for both parties;
- The subject matter of the dispute – as much detail as possible should be provided at this stage, including supporting material (copies of correspondence, notes of telephone calls, relevant contact point in other party to dispute);
- whether the dispute is being made under any specific piece of Irish/EU legislation or is in respect of a breach of a licence condition the relevant reference should be provided;
- What the impact is on the complainant of the particular issue that is the subject of the dispute;
- Details of efforts to resolve dispute between the parties.
- The complainant should also indicate whether it has any objection to the Director making available to the other party a copy of its dispute; material of a confidential nature will be withheld, but such material should be clearly marked and included in a confidential annex. (It should be noted that it may help speed up the process if material can be provided by the ODTR to the respondent without having to summarise it first).
- Whether the complaint is currently before any other body (Competition Authority, EU)
- What remedy the complainant considers appropriate to the case

Step 2

Within 3 days, the Director will assign the dispute to a particular staff member (case officer) and the case officer will provide a clear contact for the duration of the process. The case officer will carry out an initial examination of the material provided, the nature and cause of the dispute, the efforts the parties have taken to resolve the matter and will review any supporting material provided by the parties.

If in the opinion of the case officer, all avenues of resolution between the parties have not been used to full effect, the dispute may be referred back to the parties or the case officer may assist directly with the parties in attempting to resolve the dispute. Also if the case officer is of the view that further information is required the party making the request for dispute resolution will be asked to provide additional material.

Step 3

Where a case officer has sufficient information he/she will decide within 7 days whether the dispute warrants formal dispute status or whether in their opinion an alternative process may be more suitable to the particular complaint (such as mediation). The case officer will inform the parties to the dispute of the decision and

seek the agreement of the parties to pursue an alternative approach which may include, but not be limited to, mediation or facilitation procedures.

If it is decided that the dispute is such that it requires formal dispute status then a file will be opened and the other party to the dispute (the respondent) will be asked for its response to the issues raised by the complainant. The respondent may be provided with a copy of the material provided by the complainant. Confidential material will not be copied to the respondent where it is clearly marked and included in a confidential annex. The respondent will be required to respond within 21 days. In exceptional circumstances the respondent may be required to respond in a shorter timeframe. Such circumstances will include but will not be limited to, circumstances where the case officer considers that the complainant is suffering severe damage or disadvantage pending the resolution of the dispute.

The ODTR also reserves the right to seek from either party additional information that the case officer feels may assist in resolving the dispute or to carry out ancillary or related investigation that might be considered necessary.

Alternatively the case officer may decide that the complaint is unfounded and will communicate this finding to the parties concerned. Reasons for such a decision may include (but will not be limited to) that the issue that is the subject of the dispute is not in breach of any licence condition or Irish/EU legislation.

Step 4

Where the case officer considers the dispute is of a nature that may affect other parties or the market generally, the Director may publish a summary of the dispute on the ODTR website and invite comments from interested parties on any aspect of the subject. A form of electronic notification will be used to alert interested parties of any new disputes. There will be a period of 21 days for the receipt of any comments from third parties and the case officer may take such comments on board in considering the matter in hand.

Step 5

Upon receipt of the information from the respondent the case officer will examine it to determine whether enough information is available to assess the dispute. If further information is required, or clarification sought, the respondent will be required to provide it within 5 working days. The case officer may again request such additional information or carry out such ancillary investigation as he/she feels is necessary to assist in resolving the dispute.

Step 6

Once the case officer is satisfied that he/she has the information necessary to assess the dispute, he/she will within 14 days consider the points made by both parties (and any third parties where applicable) and reach a determination. The proposed determination will be communicated to the parties, with reason(s) for the decision and any action required to remedy or resolve the dispute.

Step 7

The case officer will allow 14 days for comments from the parties to the dispute to respond with their views on the proposed resolution. In cases where either no further comments are made, or where comments that are made have no significant bearing on the proposed resolution, the case officer will communicate to both parties the formal decision and resolution, together with the reasons for the decision. The decision will also be published on the ODTR website, giving a short summary of the dispute and the reason(s) for the decision.

Step 8

In communicating the ODTR decision the case officer will set a time frame for the implementation of the resolution. This will be assessed on a case by case basis, but will reflect the urgency of the dispute, the potential impact on the complainant and the impact, if any, on the development of competition overall.

Step 9

Where either party to the dispute objects to the decision made in this case they may apply in writing to the Director within 5 days of receipt of the formal notification referred to at Step 7 to request a review of the decision. In such cases the Director will assign the review to a new case officer and this officer will be provided with the file relating to the dispute. Within 5 days the case officer will review the file and recommend to the Director that the decision be either confirmed or revised. The Director will communicate her final decision in regard to the dispute within a further 3 days. The decision at this point will be final and no further assessment of the dispute will be made.

It should be noted that the review described in step 9 is confined to the case to hand. If a party to a dispute has new information or wishes to expand or amend the scope of the dispute, this will be treated as a new dispute rather than a review of an existing case.

Questions

6. *Should the same procedures be used for disputes involving licensed operators and those involving consumers? If not, what differences should there be between the two categories and why?*
7. *Do respondents agree that the timeframe proposed for the resolution of disputes is appropriate? If not, why? What alternative timeframes would be appropriate and why?*
8. *Do respondents agree that this one dispute procedure should apply to a range of different categories of disputes (interconnect, unfair practices, service provision etc)? If not, why? If not what categories of disputes should be specified and what different timeframes or procedures should be applied?*
9. *Do respondents agree that complaints should be made public for comment as proposed where the case officer considers their impact to be sufficiently wide? If not why?*

- 10. Do respondents agree with the proposal to publish summary results of complaints? If not why?*
- 11. Do respondents agree that the Director should take on board relevant comments of third parties in making her decision following the public comment process mentioned above? If not why?*

8. Report on this Consultation

The Director intends to publish her response to this consultation in May, 1999. It is intended to publish with that response a formal dispute procedure and guidelines for complainants.

Once the procedures are in place the Director will publish regularly a report on the level and nature of disputes received and on the decisions made. This will include details of the number of disputes received, the number which were given formal dispute status and the outcome of the dispute (including those not given formal status).

The publication process will have regard to the protection of commercially sensitive material supplied by parties to a dispute.

Consumer Complaint Handling

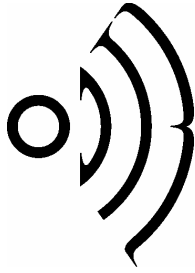
Prior to the liberalisation of the telecommunications market most individual end-users were customers of Telecom Eireann. The main avenue open to a customer of Telecom Eireann who has a complaint has been the Office of the Ombudsman. The Ombudsman's Office, established in 1980, investigates complaints in relation to the decisions or actions of State bodies and with the establishment of Telecom Eireann the Ombudsman's remit was extended to cover it also. However with the liberalisation of the telecoms market and the forthcoming Initial Public Offering of shares in Telecom Eireann, the Ombudsman may no longer be the appropriate body to deal with complaints relating to this company.

The following bodies may also be a means of resolving disputes between customers and operators:

The Small Claims Court: It operates under the District Court (Small Claims Procedures) Rules, 1993. The system provides a low cost judicial means of settling disputes between consumers and retailers and under the rules covers claims not exceeding £600.

The Office of the Director of Consumer Affairs: It was established under the Consumer Information Act, 1978 later amended by the Restrictive Practices (Amendment) Act, 1987. The office is headed by a Director, who is responsible for the enforcement of a wide range of legislation including the Sale of Goods Act, 1893, the Consumer Information Act, 1978, the Sale of Goods and Supply of Services Act, 1980 and the Consumer Credit Act, 1995. Any member of the public is entitled to submit a query or make a complaint to the office regarding the purchase of a good or the supply of a service.

The Regulator of Premium Rate Telephone Services (REGTEL): it was established in 1995 to set and maintain standards through a code of practice for premium rate telephone services (1530-1550 prefix range) and to investigate complaints from the public relating to such services. The office also approves new services and monitor content and promotion of such services.



Office of the Director of
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Regulation**

DRAFT

DISPUTE RESOLUTION

REQUEST FORM

Document No. ODTR 99/XX

March 1999

Oifig an Stiúirthóra Rialála Teileachumarsáide
Office of the Director of Telecommunications Regulation
Abbey Court, Irish Life Centre Lower Abbey Street, Dublin 1.
Telephone +353-1-804 9600 *Fax* +353-1-804 9680 *Web* www.odtr.ie

Note

It is intended that this section will be developed into guidelines for those wishing to make a complaint.

The guidelines will be formulated following the consideration of the responses to this consultation and will take account of any adjustments required on foot of those comments. The guidelines will include contact details in relation to who and how application should be submitted

1. Contact Details of Complainant

Name and business address:

Designated Contact Person: _____

Telephone Number: _____

Fax Number: _____

E-mail Address (if available): _____

2. Contact Details for Respondent

Name and business address:

Your Contact Person within Company: _____

Telephone Number: _____

Fax Number: _____

E-mail Address (if available): _____

3. Nature of Dispute

Please provide details of the exact nature of the dispute. If the dispute relates to a breach of licence condition or EU/Irish legislation please reference the appropriate condition/legislative clause.

4. Dispute Procedures attempted to-date

Please detail all steps taken by you and the respondent to resolve this matter to-date. This should include details of correspondence, meetings and escalation steps taken in any attempt to resolve the matter. Please attach copies of relevant supporting material relating to this dispute

5. Impact of Dispute

Please detail what impact this dispute is having/may have on the operation of your business. Please provide material in support of your claim.

6. Confidential Material

It is the policy of this office to forward a copy of any dispute to the respondent for its comments. Please indicate what material, if any, you consider confidential and this office will withhold it from any correspondence forwarded to the respondent. The ODTR wishes to draw to your attention that this may slow down the resolution of the dispute.

7. Remedy Required

Please indicate what action you require in order to resolve this dispute to your satisfaction.

8. Additional Information

Please provide any additional information in support of your request for ODTR involvement in this dispute.
