

October 9, 2020

Mr. Sheldon Stoilen
British Columbia Ferries Commissioner
BC Ferry Commission
PO Box 9279 Stn Prov Gov
Victoria, BC V8W 9J7

Dear Mr. Stoilen:

**Re: Complaints Process Performance Review –
Response to Recommendations**

We are writing with regard to the performance review of British Columbia Ferry Services, Inc.'s ("BC Ferries") customer complaints process under section 46.1 of the *Coastal Ferry Act*, and the recommendations included in MMK Consulting Inc.'s report dated May 1, 2020 and in the Commissioners' accompanying comments on the performance review. This letter describes the actions BC Ferries will take in response to those recommendations.

MMK Consulting Inc.'s Recommendations

- a. *Adjust the target for complaint resolution to reflect the seasonality of the business to better monitor performance*

BC Ferries has implemented this recommendation for the first quarter of Fiscal 2021. We propose to adjust the average resolution times to quarterly targets of 14 days in the first and second quarters and seven days in the third and fourth quarters.

- b. *Encourage customers to use the on-line complaint form rather than phone or email*

To help customers move toward use of the on-line complaint form, on July 3, 2020 BC Ferries removed its generic customer service email address from its website and from its correspondence to customers. Customers using the on-line form will receive an email acknowledging their feedback. Going forward, BC Ferries will explore the technical feasibility of having a copy of the completed forms returned automatically to them by email, for their records. We will keep the Commissioners apprised about this opportunity.

For general customer service purposes, and for fastest response times, customers can continue to contact BC Ferries using our toll-free numbers.

- c. *Post the Quarterly Feedback and Engagement report on BCFS website to improve transparency*

BC Ferries proposes to post the quarterly feedback and engagement report, going forward with reports for Fiscal 2021. The reports will be posted after they are reviewed and discussed at quarterly meetings with the Commissioners.

- d. *Incorporate 'lessons learnt' from complaints into operations to a larger extent than what is currently done*

BC Ferries believes that the first step to implement this recommendation is to consolidate the feedback received from customers in an improved and more efficient manner so that we can understand what the issues are and the outcomes will be. To this end, with the assistance of an independent research firm, we will work to improve how the data from our complaint resolution system is combined with feedback from other channels, such as the Customer Satisfaction Tracking survey.

This new consolidated customer feedback and engagement report will include actions taken to improve service.

We will use consolidated feedback and engagement reports in Corporate Strategic planning to identify further actions for improvements.

- e. *Update the Complaint Resolution System to provide enhanced management reporting (specifically an "aged" complaints metric) but should only be done when financially feasible*

BC Ferries agrees that the complaint resolution system will be upgraded or replaced at some point in the next few years. BC Ferries is experiencing considerable declines in revenue directly because of the Covid-19 pandemic, and non-essential capital projects are being deferred to future years. Within this context, the timing and nature of this replacement is to be determined.

With regard specifically to the "aged" complaints metric, BC Ferries has been working with its independent research consultant and will present this metric in its quarterly reports going forward. The metric has already been incorporated into the Q1 Fiscal 2021 Feedback and Engagement Report.

British Columbia Ferries Commissioner's Recommendations

- f. *BC Ferries should update their customer complaint process for Commissioners' approval*

BC Ferries has made draft changes to the customer complaints process, which were received by the Commissioner during the performance review. We will make further changes to incorporate the outcomes from recommendations in this performance review, such as alterations to timelines to adjust for seasonality of customer traffic, and the incorporation of an independent complaint review process by the Commissioner.

The updated customer complaint process will be submitted for approval by the Commissioner in accordance with section 45.2 of the *Coastal Ferry Act*. BC Ferries anticipates this will occur in fall, 2020.

- g. BC Ferries should post on its website a simplified description of their customer complaints process for ease of communication with customers*

When BC Ferries submits the customer complaints process to the Commissioner for approval (see recommendation (f) above), we propose also to include a simplified description of the process for the Commissioner's review and feedback. While the approach to this description is still to be determined, BC Ferries anticipates that it will include a combination of text and pictograms.

- h. BC Ferries should co-ordinate with BCFC to implement a more formal and structured process to track the complaints that the Commissioners refer to BC Ferries for their response and, in addition, report quarterly on any complaints that have been raised within BC Ferries to its executive as part of its complaint escalation process*

BC Ferries has communicated with the Commissioners about formally tracking complaints referred to BC Ferries by the Commissioner. We propose to continue with the current process of addressing the complaints received through the Commissioners, with the added step that every quarter we will submit an anonymized list of the complaints received from the Commission with a short summary of their disposition with dates.

At the same time, BC Ferries will report quarterly on any complaints that have been raised within BC Ferries to its executive as part of its complaint escalation process. This will be completed for Q1 Fiscal 2021.

- i. In recognition of the public interest, BC Ferries should amend their customer complaints process to include an independent review process whereby a complaint that could not be resolved to the complainant's satisfaction by BC Ferries, and as long as the complaint falls within the Commissioners' jurisdiction, can be referred to BCFC*

BC Ferries will amend the complaints process as recommended by the Commissioners. The updated process will be submitted to the Commissioner for approval in accordance with section 45.2 of the *Coastal Ferry Act* (see recommendation (f) above).

We trust that you will not hesitate to contact us if additional information is required.

Sincerely,



Jason Barabash
Vice President, General Counsel & Corporate Secretary