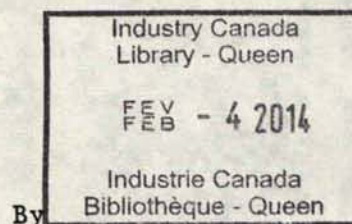


TOWARD MORE EFFECTIVE COMPLAINT-HANDLING SYSTEMS IN CANADA

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The views presented in this paper are those of the author and do not necessarily reflect the views or positions of the Department of C.C.A.

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I BACKGROUND

In May, 1979, the author entered into a contract with CCAC to develop a paper on complaint handling in Canada, to present it at two specified conferences and, based on the resulting feedback, to present a revised version to the Minister. The contract covered out-of-pocket expenses, but not a fee for services. Thus the undertaking had some of the elements of a scholarly investigation and some of the characteristics of a consulting assignment.

The emphasis in the paper was to be on the criteria appropriate to the design and management of an effective system of complaint-handling in Canada, the current status and prospects of complaint handling in Canada, and the gaps and alternative solutions or initiatives which might be undertaken as a consequence.

II PURPOSE

The purpose of this document is to meet that undertaking. More specifically, it is presented as a basis for discussion in a meeting between the author and officers of CCAC scheduled for Wednesday, August 22nd.

However, this presentation aims to go beyond the tasks specified in the contract. In a variety of capacities, the author has interacted with CCAC for some years. Out of that interaction has come a base of personal interest, experience and opinion that goes beyond the contract. The hope is to use that base wherever it may be helpful. Therefore, where a suggestion seems actionable and useful, but may be beyond the terms of the contract, it is offered nevertheless.

In this there are some risks. The author is not privy to all pertinent events and detailed Departmental thinking concerning consumer assistance since the change in government in May. There is, therefore, the possibility that, for lack of current, privileged, information some recommendations will lose some force. However, the discomforts of being somewhat off target are outweighed by the disadvantages of endorsing protracted inaction. Thus the risks are accepted.

In recent years, the author has prepared for CCAC two other submissions on complaint-handling. One was entitled "A Plan For Evaluating Standards of Service in Complaint Handling in the Department of Consumer and Corporate Affairs" dated June, 1976; the other was "Some Emerging Themes in Consumer Assistance" in the proceedings of the National Conference on Consumer Assistance, which were entitled "Complaint Handling in Canada: Toward A Better Network" published in the summer of 1979 and also edited by the author. It will be assumed that the reader is familiar with the second of these, but not the first.

III CRITERIA OF EFFECTIVENESS IN A COMPLAINT-HANDLING SYSTEM

Introduction

The past decade has seen a rapid increase in formal consumer complaints and a multiplication of complaint-handling agencies in North America. They are operated by governments, companies, trade associations, consumer groups, and media. It may be that parallel trends will be seen in Europe.

The advance of complaint-handling agencies signals a revised view of the marketplace. Conventionally, the consumer has been seen as having adequate redress against sellers with whom he was dissatisfied. When he was not well served, his recourse has lain in the competitive market mechanism and in the litigative process. Together, these mechanisms have been thought to bring effective sanctions to bear on the marketer who is unresponsive to legitimate consumer complaints.

In recent years, the redemptive power of these mechanisms has been somewhat weakened. This weakening has many causes. They include the loss of personal contact between buyer and seller in the modern marketplace, the mounting complexity of consumer products, the growing reliance of the public on the service industries, the bureaucratic nature of larger organizations, and the diffusion of the consumer interest compared to the concentration of sellers' interest.

As a result, it is argued, customers find it increasingly difficult to obtain ready redress of reasonable grievances against both business and government organizations. In the Consumer Controversies Resolution Act, the U.S. Congress goes as far as to say that, "... for the majority of American consumers, mechanisms for the resolution of small claims and controversies involving consumer goods and services are unavailable, unfair, ineffective or invisible."¹ Equally negative has been the judgement of the head of the Federal Trade Commission: "The simple fact is that for vast and increasing numbers of consumers with valid complaints, there is nothing to be done ... other than kick the dog, yell at his children, and curse at his wife."² Nor are such judgements limited to legislators and regulators. In a brief, blunt document dealing with the "fair settlement of just consumer claims," a spokesman for the U.S. Chamber of Commerce refers to "the absence of [redress systems which are] of effective, accessible, uncomplex and trusted."³ There seems little reason to believe that the general verdict in Canada would be substantially different than this.

In this setting, complaint-handling agencies may give an added dimension and a new responsiveness to the modern marketplace.

However, before that promise can be fully realized, they must be well designed and managed.

There too, however, there is sobering evidence that management has far to go. Several major surveys have invited North Americans to evaluate complaint-handling schemes. Responses have been ambivalent at best. One investigation concludes as follows: "The data from this study permit both an optimistic and a pessimistic view of business' performance in respect to complaints... The pattern of responses sway us toward the pessimistic view of business performance... Business should be alarmed at the amount of unresolved dissatisfaction in the marketplace."⁴ Clearly, there are substantial opportunities for improvement in the U.S. Again, it seems likely that similar studies would arrive at similar conclusions in Canada.

A step toward improvement is to "discover, document and publicize the elements which make up an effective complaint handling mechanism, whatever its origin."⁵ This section has that purpose. More specifically, it attempts to identify and discuss a set of standards which will be widely useful to managers attempting to develop more effective complaint-handling systems.

Some Tests Of Effectiveness

Visibility

From a marketing point of view, a complaint-handling service which is largely unknown is all but nonexistent.

Unfortunately, this is all too often the case. Not uncommonly, even leading schemes are known to only a perceptive minority of the public. For practical purposes, such services are well-kept secrets.

In the case of complaint handling, weak-kneed publicity is understandable. One deterrent is "the Pandora syndrome, a very human reticence to solicit criticism."⁷ Another obstacle to the vigorous promotion of complaint-handling services is that "costs may go up, even sharply, with the same amorphous benefits that managers face when they seek to measure other promotional expenditures such as advertising."⁸

While this posture may be understandable currently, it is not defensible permanently. An effective strategy must have internal consistency. Thus, by the test of rational management, there is a catch 22 quality about any operation, including a complaint-handling system, in which production resources have been put in place but marketing resources are then withheld for fear that the plant will get too much business. The only circumstances under which such a posture is rational is where a token program is the most profitable offer. As consumers become more street-wise, the situations in which tokenism can pay become more rare. Once mounted, then, complaint-handling systems should be promoted.

Complaint resolution can be publicized in a variety of ways. In the U.S., the sponsors of the Major Appliance Consumer Action Panel (MACAP) tell consumers about that program in the instruction manuals that accompany major appliances. To encourage the use of its consumer panel, the National Automobile Dealers' Association uses systematic press announcements in local media. This has a spiralling effect: "In addition to stimulating direct response, press announcements have caused [the program] to be listed in various public reference sources".⁸ The Carpet and Rug Industry Consumer Action Panel, (CRICAP), also in the U.S., has received still more concerted publicity. It is promoted to and through individuals, home economists, action groups, attorneys general, carpet manufacturers, carpet wholesalers, carpet retailers, and national magazines.⁹ Air Canada leads with its chin by via an "invitation to comment" card in the seat pocket of aircraft six times a year for a one month period.¹⁰

These kinds of efforts can no longer be optional. As the U.S. Chamber of Commerce has said, "reforms will be of little value unless adequate and continuing publicity is given to informing consumers of the means available to enforce their rights".¹¹

Special effort will have to be given to informing consumers who are disadvantaged. Often it is those who are uneducated, infirm, isolated, and poor who are least aware of available consumer assistance.¹² Therefore "in no country in the world is consumer awareness ... of complaint-handling mechanisms anywhere close to equally (or even equitably) distributed throughout the population".¹³ The consequence is that complaint-handling systems tend to be used least by those who need them most. Thus the promoting of complaint-handling services will be not only an act of rational management, but an instrument of social justice.

Access

An effective complaint-handling system must be more than visible; it must be accessible. Moreover, it must be accessible to its target clientele.

This can be a deceptively difficult specification to meet. It must be remembered that "all complaint mechanisms 'deselect' complaints. Who's affected depends on the procedures used to accept and process complaints".¹⁴

Moreover, the number of potential barriers to access is very large. The location of the service, the timing of its availability, the level of literacy, knowledge persistence, patience, self-confidence and language skills required to use the service -- these and other features of a scheme can make it more or less accessible to intended users.

To the disadvantaged, these obstacles can be insuperable. Thus

complaint-handling services are notoriously unavailable to the under-privileged.

It follows that a consumer-oriented review of existing arrangements can often reveal opportunities to improve the availability of a complaint-handling mechanism. For example, the Canadian Government was able to reach more disadvantaged consumers when it went beyond its original "Box 99," which normally required correspondence and long distance calls, and made this complaints and inquiries service available through trusted local people in unpretentious drop-in centers in high traffic locations in depressed areas. Similarly, it has been suggested that in the United States, the Better Business Bureau's National Consumer Arbitration Program (which can already be held in the complainant's home) would be available to more consumers if its purview included both non-marketplace disputes and damages transcending the actual product complaint being arbitrated.¹⁵

American Motors promotes access to its Buyer Protection Plan by subsidizing its dealers to offer free loaner cars and by providing a toll-free hotline to Detroit. In like fashion, small claims courts can be made more accessible by extending their hours to evenings and Saturdays, by allowing hearings in appropriate languages, by raising the dollar limit to cover most cases which could not be economically carried to the regular courts, by permitting corporate plaintiffs, by forbidding representation by lawyers, by providing assistance in preparing cases, in presenting arguments and in collecting judgements, by offering the more private and less formal alternative of court-ordered arbitration, and by locating the courts, "like post offices", in neighbourhood areas and shopping centers. In the Province of Quebec, many of these features are specified in the Act to Promote Access to Justice.¹⁶

Speed

Justice delayed is justice denied. Thus a third criterion for a complaint-handling system is its speed.

One of the reasons that binding arbitration of consumer complaints is finding wider acceptance is that it is faster than mediation or arbitration.¹⁷ For example, retailers experimenting with binding arbitration under the Better Business Bureau report that the average time for the entire process is 18 days.¹⁸

One way to promote dispatch is to specify response times. Thus, when the Detroit Auto Dealers Association takes a complaint, the offending dealer has 30 days to report back. Another is to use speedier media. Thus there appears to be a move, both in the public and in the private sector, to respond where possible by phone rather than letter. Verbal communication lacks some of the hard copy qualities on which bureaucracies thrive -- but it has some of the soft, personal qualities to which John Doe responds.

Speed also benefits the seller. When settlement is delayed, top management is often drawn in, and that is costly. Consider the saga of Firestone's 500 series radial tires. As much as the original product defects, it was the subsequent corporate stonewalling that brought the company such expensive public agonies.¹⁹ (In driving, speed kills; in complaint-handling, speed heals.)

Clarity

An effective complaint-handling process is one that is clear at all stages to all parties.

Those experienced in resolving complaints certify that a major source of acrimony is a failure of communications. This judgement is reinforced by the fact that in many systems a large proportion of complaints are settled at the early "communications" stage of the process in which the disputing parties are put in touch with one another. With the Automobile Consumer Action Panel (AUTOCAP), for example, "the majority of cases can be resolved to the satisfaction of all parties simply by making the dealer aware of a customer's difficulty", so that "cases can be closed without actual Panel deliberation".²⁰ Clearly, merely keeping the lines of communication open can pay large dividends.

More specifically, the complainant should be told his rights and responsibilities under the scheme. The U.S. National Institute for Consumer Justice found that "many persons have basic misconceptions and uncertainties as to their legal rights ...".²¹ Part of the reform of some small claims courts is that "both of the parties are provided literature and advice on how to prepare their cases ... as well as thorough information about what the process entails".²² It was concluded that "These suggestions, as elementary as they might appear to an attorney, were of significant assistance to the consumer."²³

However, it is not only consumers who need to understand the system. In many-layered marketing channels any player can be unsure of his role in a dispute. An auto manufacturer traces the origins of a "basic problem": "As warranty periods ... expanded, and the complexity of vehicles increased, we came to rely on dealers to make certain ... checks to determine whether work done at the plants was up to specification ... The result was a complex series of responsibilities. ... Customers couldn't remember who did what to whom and, in many cases, the dealer's service manager wasn't sure which tasks were his responsibility and which were the factory's."²⁴ The danger of buck-passing in lieu of complaint-handling is clear.

A detailed list of what the parties need to know includes: who is to handle the complaint, how the complaint must be framed, how long it may take, when progress reports are due, and what appeals are available.²⁵

Feedback

It is a principle of good marketing, indeed of effective administration, that managers get feedback on their efforts. Moreover, that feedback, if it is to guide future efforts, must be aligned to appropriate standards of success. These criteria of effectiveness should derive, in turn, from the objectives of the enterprise. Given the aims of complaint-handling, one test of success should be the degree of satisfaction with the outcome as reported by the disputants.

At the macro level, the need for feedback has had considerable emphasis. To begin with, it has been recognized: "... we need systematically collected information on the outcome of consumer complaint handling processes. ... What happened in the end ... To what extent do consumer complaints ultimately result in consumer satisfaction?"²⁶ Also, a start has been made on the methodological problems of measuring consumer satisfaction and dissatisfaction.²⁷ In addition, several studies have been done which survey how segments of the buying public feel about their experiences in attempting to get redress.²⁸ Further off lies the prospect, probably elusive and disputative, that we may move toward measures of satisfaction which are common to many complaint-handling systems. Still more ambitious is the suggestion that the feedback from such tests should be made public. As one proponent has said, "Surely ... one simply can't take the word of those who have created a complaint-handling mechanism that all is well. It may be; it may not be. Providing for the public an outside evaluation by an independent research organization may be an important step in helping all concerned differentiate between effective and ineffective complaint-handling mechanisms."²⁹ Toward that end, MACAP and CRICAP are "far along the road in developing a standing system of evaluation and complaint results audit by a non-panel, objective expert from either a university or outstanding consultant firm".³⁰ At the macro level, then, one can perceive a variety of initiatives aimed at improving the feedback from complaint-handling systems.

At the micro level, progress is far less evident. A few programs have built-in provisions for measuring the buyer's satisfaction with the settlement.³¹ Apparently none are designed to evaluate the seller's satisfaction even though this would be logical in any third-party scheme which aims at impartiality. Still more liable to administrative myopia are those government- and community-run systems whose value is measured (and touted) by the amounts of money they return to complaining consumers. In programs where the only data fed back are on funds recovered, there is a clear danger that complaint-handlers will proceed from the pernicious premise that the customer is always right.

In other complaint-handling programs, feedback seems to be not unbalanced but inchoate. When specific complaint-handling mechanisms are described in the literature, what is often striking is the

writer's silence on how management gets feedback on how well their programs are accomplishing their objectives. Since these descriptions are usually offered by the managers and proponents of these programs, it seems reasonable to conclude that feedback is not discussed because it does not exist.

Yet feedback from client surveys can have substantial managerial value. In one industry-run scheme in which complaints are either upheld or denied against a published code of seller conduct, all recent complainants were polled. Cross-tabulation revealed a sizable proportion of "dissatisfied winners" -- an unexpected and unwelcome result. Further probing showed these to be clients who were gratified by the verdict but aggravated by the process. Given this insight, complaint-handlers shifted some attention from making judgements to communicating verdicts. The result was a net gain in overall effectiveness. Discovery of another apparent paradox, "satisfied losers", had equally profitable implications for action.³²

Whatever the reasons that individual complaint-handling schemes are under-evaluated, it seems clear that adequate feedback, while solidly endorsed at the macro level, is seldom adequate at the micro level. This, then, is an element of good design which deserves emphasis in any effort to improve the effectiveness of complaint-handling processes.

Therapy

It is the common experience of those in the field that a minority of issues, products, companies and industries generate a majority of all complaints. This being the case, the endlessly repeated resolution of the same basic complaint is an unacceptable exercise. A complaint-handling facility should have a capability to spot patterns of chronic complaints and to trigger an attack on root causes. This means that a truly effective complaint-handling system has two functions: "assisting in individual complaint resolution and identifying and correcting product design problems and patterns of service abuse."³³

Some schemes have that second capability. The MACAP and CRICAP panels "are using the individual complaints as a basis for major recommendations to industry to eliminate categories of complaints."³⁴ Toyota offers each dealer a survey of his most recent service customers so that he "will be able to make intelligent changes to upgrade performance."³⁵ Similarly, the Consumer Product Safety Commission uses consumer complaints as part of its intelligence system to identify and eliminate unreasonable product hazards.³⁶

However, too many complaint-handling systems do not have that preventive capability. And when they do not, then even their first function, individual complaint resolution, will suffer. This is because, when chronic problems do not get preemptive attention, "the overall pattern of problems coming to complaint handlers is

undiminished and unchanged ... [Then], in the field there is continual reference to the frustration of serving as human telephone books and the fruitlessness of repeatedly treating the same complaint."³⁷ Complaint-handling staffs who perceive themselves to be misused are unlikely to deliver first-class service. For the sake of all, then, leaders in the complaint-handling field must move beyond dodging alligators and get to the task of draining the swamp.

Fairness

Fairness in a complaint-handling system is a criterion which is both crucial and elusive.

If fairness is to be preserved, the motives of the sponsors must be seen to be acceptable. Thus media-sponsored schemes confront the contradictory suspicions that they are either too strident, so to attract audiences, or too submissive, so to placate advertisers. Similarly, to maximize its credibility, the Better Business Bureau's National Consumer Arbitration Program must somehow set aside perceptions of bias because the BBB administers the scheme, the BBB is financed by business, and the BBB has served as mediator in the disputes going to arbitration.³⁸

Fairness also requires that the process not "railroad" either party. For example, when litigants come to the small claims court, and when they are offered court-supervised compulsory arbitration instead, it is important that they continue to have the right to opt to bring their case to court; otherwise they could feel shunted onto a track leading to unreasonably rough justice.

The perceived fairness of the process will also depend on the way that the disputing parties approach it. It needs to be remembered that, like sellers, buyers can use complaint-handling systems to club the other party into submission. An American executive complains that "The first you may know that you have a problem is when you get a letter which indicates copies have been sent to the Department of Consumer Affairs, the [regulatory commissions], and the press hot lines. It's like an organized assault."³⁹ When such tactics lead companies to refund first and reason later, then justice is at risk.

But where fairness is the issue, the acid test question is "Who makes judgements?" Thus one element of fairness in the BBB's arbitration scheme is the way that arbitrators are chosen. "... The Bureau sends a list of five trained arbitrators selected at random from a pool of volunteers ... [They] represent all segments of the community -- lawyers, academicians, senior citizens, college students, businessmen, and others ... When the parties receive a biography and description of each, they ... cross off the list any arbitrator who is deemed unsatisfactory. The parties ... then [indicate] their priority choices for the remaining arbitrators. The Bureau then takes the highest overlapping available choice of both parties."⁴⁰

Where group judgements are involved, fairness is usually thought to call for a cross section of people, and, as North Americans continue to turn away from the expert and toward the citizen as policymaker, one can expect increasing insistence that the cross section include consumers. As one spokesman has said, "Too often, consumer activism has been indirect, aimed at the public, the legislature, the administrative agencies or the courts. ... It is possible for consumers to participate directly in the production and marketing process."⁴¹

Within companies in North America, this possibility is seldom acted on: most corporate complaint-handling schemes do not use consumers as adjudicators. Across industries, however, a new openness is evident: more and more industry-wide complaint-handling systems do include consumers as arbiters. Prominent among the examples are the consumer action panels operating in the auto appliance, carpeting and furniture fields,⁴² but the list of illustrations runs to many other industry-wide systems.⁴³ Canada's Advertising Standards Council is an example of an adjudicating body that began with only industry representatives but now has a good mix of government and consumer representations.⁴⁴ In the U.S., this pattern is now accepted widely enough that some people outside of industry are stating that "consumer involvement in resolving complaints is a breakthrough ...".⁴⁵

Sometimes government officials are included on juries as proxies for consumers. As distrust of governments mounts, the fairness of this arrangement may be questioned. Thus when one U.S. automaker introduced a "consumer appeals board" comprised largely of state employees, the head of the state's consumer council suggested that "it would have been far better ... if they had gotten their lay people from outside government."⁴⁶

It may be, too, that an increasingly knowing and jaded public will look behind the consumer representative to be sure that fairness is not lost because he or she is manipulated by the office staff. In many complaint-handling processes, the secretariat settles many more complaints than reach the official judges.⁴⁷ In such cases, justice can suffer. Thus the MACAP panel has been criticized by the U.S. National Institute for Consumer Justice because "although the panel itself is independent, the panel members are dependent on industry-hired staff."⁴⁸

Clearly, meeting the one criterion of fairness can require a judicious blending of several features in a complaint-handling system.

Management Support

None of the preceding criteria will be met unless one other is honoured. It is that a complaint-handling system must have the genuine support of management.

All too often, this is not the case. A study of some of the most consumer-oriented of companies, U.S. consumer packaged goods manufacturers,

concluded that, "Complaint-handling departments are usually mere window dressing ... There seems to be little executive concern about the department's policies and activities. ... Likewise there is apparently little input from the department into executive decisions."⁴⁹

The reason for this is a lack of conviction, in both the public and private sectors, that complaint-handling is "good business". To a point, this uncertainty is natural. The expenses generated in dealing with disputes are predictable, but the returns are not. Thus while academics, legislators and regulators may urge a more enlightened view, managers must observe that the net gains are painfully obscure. Indeed, when the patrons of a service generate headaches rather than revenues, it is not clear whether the sponsor of a complaint-handling service should hope for more business or less.

However, management must take a larger, longer view. Increasingly, consumers are being taught that if they find no redress at the point of purchase, they should "go to the top".⁵⁰ Thus, "when disputes billow into full-blown, bitter controversies ... high-ranking company officials ... can get involved."⁵¹ This misallocates valuable corporate resources.

Still worse, management may be spared the trouble when it should not. Several consumer surveys have underlined that for every complaint which surfaces, many simply fester. If these unacknowledged grievances cause unseen customer defections, the result for executives is an invisible hemorrhage on sales. Therefore, when researchers conclude that in the majority of companies "complaints ... appear to have no impact on production or marketing decisions",⁵³ management should consider whether parsimonious complaint-handling programs are not in fact expensive.

Alternatively, it can be argued that well-developed complaint handling can be profitable. Some have suggested a "top-level complaint-review committee, including senior marketing, production, accounting, and service personnel".⁵⁴ If complaints feed into an organization's management information system, then they can aid quality control, guide product improvements and suggest marketing opportunities. Some new opportunities have been glimpsed by a number of leading U.S. retailing organizations. Having made pre-commitments to settle difficult complaints through binding arbitration, management is having the stores advertise that fact.⁵⁵ Ultimately it is to be hoped that, with solid management support, more companies will "market the complaint-handling system to customers."⁵⁶

User Orientation

Like other services which are expected to operate effectively in the marketplace, complaint-handling schemes should be user oriented. More specifically, their design should derive from a careful analysis of the needs of their clientele.

The form and rigour of the analysis will be governed by the circumstances. In a small operation addressed to a specific ethnic

area, close personal solicitude alone may insure an accurate user focus. A more elaborate methodology would be necessary to determine, say, whether potential users of the small claims courts are seriously disaccommodated or deterred by the formality of the institution, the unfamiliarity of the process, or the limit on the amount to be litigated.

The relevant users of complaint-resolution systems include not only the buyer but the seller. It is therefore appropriate, in a user-oriented service, that the needs of the vendor be weighed. This can confront the designers of the system with a tradeoff. One resolution is to shape the system to the requirements of the buyer up to the point where the seller would appear to be repaid by continued patronage. The approach of an automobile manufacturer illustrates this concept: ... "Analysis of satisfaction data showed that if a dealer took action within 14 days ... 22% of the owners said they would repurchase [our make]. But if a dealer responded in 6 days, then we found that ... repurchase intention went up to 50%. With the expectation for a personalized response within six days ... we set new objectives and started to build policies and programs around them."⁵⁷

More explicit attention to clients' expectations can lead to improved services for them. For example, several organizations have found through research that consumer reaction to their form letters was sufficiently negative to warrant a more personalized corporate response.⁵⁸ However, user orientation need not mean more expensive complaint-handling any more than a consumer orientation should lead to less profitable marketing. A survey of the customers of the beauty care industry showed that they often failed to bring their complaints to the vendor, but that the basic reason was not inadequate redress mechanisms and that the appropriate response was not more elaborate complaint services.⁵⁹ Thus, objective examination of users' needs can serve both parties: It can protect the buyer from encountering complaint services which are niggardly, and it can protect the seller from mounting remedies which are excessive.

Integration

In the marketplace there is "an ecology of individual redress mechanisms."⁶⁰ Therefore, to approach its full potential, a complaint-handling service cannot operate in isolation; it must be actively related to other organizations in its ecological network.

Related organizations certainly include similar ones. To underline this, it is increasingly common for complaint-handlers in the same industry to find mutual benefits in collaborative action. These may be, for example, retailers franchised by a common supplier or manufacturers belonging to the same trade association.

However, the connections should go beyond these conventional links. The ecological analogy emphasizes that an operating

system is defined by interdependence of action rather than similarity of form. In keeping with this emphasis, organizational theorists have advanced the concept of a firm's "organization-set," this being the body of organizations with which an enterprise interacts in its environment.⁶¹

If these motions have meaning, then managers of complaint-handling systems should take a catholic view of those with whom they should be linked, the acid test being whether, out of their interaction, the process of consumer redress is made more effective. Following that guideline, the potential connections are many and varied. For example, the U.S. Office of Consumer Affairs is working with state and local offices and with business organizations to develop a comprehensive system of coding and cataloguing consumer complaints, the National Center For Dispute Settlement collaborates with retailers, radio stations, consumer groups and human rights commissions to pioneer new techniques of mediation, conciliation, and arbitration, and an association of automobile dealers in Washington, D.C., is forging "inter-corporate agreements" with auto manufacturers, finance companies, insurance companies, tire companies, and parts suppliers so that "our dealer community will be able to provide their customers with a still greater degree of industry-wide responsiveness."⁶²

Such collaboration remains too rare. In speeches, conferences and surveys⁶³ those associated with consumer assistance programs testify that complaint services are too isolated and uncoordinated. "It all adds up to a free-form jungle rather than an integrated system."⁶⁴ This is not surprising in light of the newness of the field, the limited resources available to those in it, and the pressure they feel to meet daily exigencies.

However, the cost of fragmentation is high. It causes the practitioner to duplicate others' efforts and it starves him of others' successful ideas. More important, it confuses the consumer as to what instruments of redress are available to him, and it presents him with duplicate coverage in some areas and none in others.

This is not to suggest that a country's complaint-handling apparatus should be very centralized or to agree that "the issue of consumer complaints demands a national policy now."⁶⁵ It is to observe that, for lack of more common-sense integration of individual schemes, the marketplace lacks the best redress possible.

Conclusion

The task of building effective complaint-handling systems does not end with establishing individual criteria. To further complicate the process, the various criteria are, in part, at odds with one another. Consequently, the system designer may have to approach one standard by retreating from another. For example, one may have to weigh justice against speed, conclusive-

ness against compulsion, and speed against economy. Altogether, those who would develop well-rounded complaint-handling systems must work thoughtfully through a large number of tradeoffs. That job is also substantial.

However, it is worth undertaking. Many writers have suggested that the consumers' faith in the business system is affected to a significant degree by their ability to get redress when the system fails them. If that is so, then managers who work toward more effective complaint-handling systems will be promoting their own organizations and protecting the system in which they operate.

IV THE STATUS OF THE COMPLAINT-HANDLING FIELD IN CANADA

In this section, it will be assumed that the reader is familiar with the author's "The Conference in Review: Some Emerging Themes in Consumer Assistance," in "Complaint-Handling in Canada: Toward a Better Network," which is the proceedings of the National Conference on Consumer Assistance.

Some Marks of Progress

In some respects, the complaint-handling field in Canada has made encouraging progress during the past decade. The complaint-resolution services available to Canadians have become many and varied. The total capacity of these schemes, and the traffic handled by them, has mushroomed. A literature useful to managers has begun to develop.⁶⁶ Practitioners have come together to share experiences and ideas at a national conference (sponsored by CCAC). A related professional association, SOCAP, has established its first Canadian chapter. These are marks of significant progress.

At the same time, there are many inadequacies to address. Reference to the criteria in section III serves to highlight the main ways in which the system needs improvement.

To begin with, many redress mechanisms are invisible to many Canadians. For example, the existence of Box 99 -- a leading scheme -- is probably unknown to 90% of taxpayers. Only the Better Business Bureau has a prominent image -- and it may be an inaccurate one. Moreover, this form of consumer assistance is probably known least to those who need it most.

Access is similarly constrained. The augmented capacity of the system is outpaced by the mounting volume it is asked to handle. Moreover this larger volume is overshadowed by apparent need. As a result, it is the common testimony of those in the field (subject, no doubt, to some inflation) that Canada's complaint-handling network is substantially overburdened. Thus some of its invisibility is by design. And again it may well be that the system is least accessible to the most disadvantaged.

Because the resources in complaint-handling programs are usually stretched thin, there is little time or talent left to elicit feedback on how well the system has served its clients. Therefore, in lieu of reading relevant measures of accomplishment like degree of satisfaction, most complaint-handling managers settle to count expedient surrogates like the number of cases closed. This is feedback of the crudest kind.

This same constrained condition frustrates good intentions to get to the bottom of the problems that cause consumer complaints. Complaint-handlers seem not to lack accurate definitions of chronic problems, contributing culprits and even appropriate remedies. What they are often short of is the requisite energy and clout to take therapeutic action. If CCAC can experience this

difficulty, as it has,⁶⁷ then other operators with less experience, independence and authority can do so too.

In most redress mechanisms there appear to be stated "par" response times which complaint-handlers are expected to meet. Whether these times are acceptable is a larger question which may or may not be pursued. When it is not, speed becomes a proxy for satisfaction.

As noted in section III, fairness is, of all the qualities discussed, the most difficult to establish. An overall assessment of the performance of our system on this count would call for a judgement of more heroic proportions than this author is prepared to assay. However, of the several requisites for fairness, one is crucial and observable: it is the degree to which the purchaser, if dissatisfied with his own efforts to get redress, can appeal beyond the vendor to a third party. This third party may be a more senior corporate executive or an independent outsider. By that rather myopic test, one might conclude that a persistent consumer can usually get access to at least rough justice.

The extent of user orientation in Canada's complaint-handling network is also difficult to assess. Among leading firms selling household capital equipment, explicit research on users' expectations may be encouraged by the fact that a forthcoming warranty and a responsive service capability can be justified as a self-liquidating element in the company's marketing mix. Cases of this were cited in section III. In smaller, less formal schemes, personal osmosis may ensure reasonable attention to complainants' needs. Overall, however, what was said about feedback at the end of the process may be largely true of user orientation at the beginning of the process.

As complaint-handling schemes have proliferated they have remained unintegrated. There can be little doubt, then, that the resulting body is largely uncoordinated. It was the universal observation at the National Conference on Consumer Assistance that practitioners are unaware of one another's policies, domains, and operations. If practitioners see a montage, consumers probably see a puzzle.

On the basis of this necessarily subjective review, one would conclude that the main problems deserving CCAC's attention are those of visibility, access, and integration, followed by user orientation, feedback and therapy.

V SOME RECOMMENDATIONS FOR ACTION
BY CONSUMER AND CORPORATE AFFAIRS CANADA

What follows is a series of suggestions as to actions which CCAC might take to meet the shortcomings of Canada's complaint-handling system as discussed in section IV. To focus discussion, the ideas are put forward as recommendations.

Recommendation #1

The Consumer Affairs Bureau should take, as its priority clientele, the disadvantaged consumer.

Reasons

Like any missile aimed at no clear target, an organization directed to no specified clientele will miss its mark. This is especially true in those organizations which lack the directional signals provided by a market mechanism. The need for a defined clientele is still greater in the Consumer Affairs Bureau because the term "consumer" embraces everyone and highlights no one.

However, in the Bureau over the last decade there has seemed to be an emerging priority clientele. Three trends have converged to sharpen the Bureau's focus. First, while the planning documents mentioning sellers as clients have not been repudiated, the actions of the Bureau indicate that the early emphasis on helping the buyer rather than the seller has become more emphatic. Second, attention has moved to some extent away from all consumers and toward disadvantaged ones. Third, prime concern has narrowed from disadvantaged consumers loosely defined to disadvantaged consumers of four specified kinds: "The emphasis is on reaching low-income families, recent immigrants, the elderly, and native peoples."⁶⁸

This is a fitting focus. Those with little education, lower incomes, inferior health and uncertain language skills do tend to be treated less fairly in the marketplace and to have less access to redress. A bureau unable to be all things to all people might quite appropriately concentrate its efforts on those consumers who are disadvantaged.

Recommendation #2

It is recommended that the Bureau treat "consumer" complaints defined in the broadest way.

Reasons

The reasons for this posture are both philosophical and operational. On philosophical grounds, it can be argued that, from the point of view of the citizen as consumer, there are few meaningful differences between a supplier in the private sector and one in the public sector. Both businesses and governments offer consumer services; both have customers that pay for these

services in some combination of time, money, and trauma; and both are capable of treating their clientele badly or well. In fact, one might hypothesize that a government is more likely than a company to create a complaining customer.⁶⁹ On this reasoning, the Bureau should readily accept grievances originating outside of the commercial marketplace.

On operational grounds, it can be argued that if the Department gives special consideration to the real needs of disadvantaged citizens, as is proposed, then it must be prepared to deal with a mix of grievances that will go well beyond a list of "consumer" complaints narrowly defined. This is because, in the world of underprivileged consumers, government services are more essential to basic wellbeing. This is seen in the fact that the CHO's, which are more directly addressed to disadvantaged consumers than is Box 99, attract a disproportionate number of complaints about "government functions and services."⁷⁰

Thus the proposal to emphasize underprivileged consumers and the proposal to embrace all "consumer" complaints are suggestions that go hand in hand.

Recommendation #3

It is recommended that CCAC confirm and/or clarify its intention to shift resources away from individual complaint-handling via Box 99.

Reasons

The reason is not that Box 99 is necessarily inefficient. It is true that, at the National Conference on Consumer Assistance, Box 99 was criticized for its impersonality, centralization and lack of expertise.⁷¹ It is also true that in-house reports have suggested that Box 99 is costly relative to similar other private services.⁷² In fairness, however, it must be noted that these charges are unsubstantiated. Indeed, the Canadian Consumer Council was evidently accurate in stating that "this allegation [that Box 99 is costly and inefficient] is not supported by any departmental survey of the program's actual efficiency such as in terms of the real satisfaction level of consumers using it, or by studies on ways to improve it."⁷³ The author is prepared to believe he would find, as he did when studying Box 99 for CCAC in 1976, that its help "has been given with a diligence which admits of little criticism," and that it has "a record of effort to which the Department can point with pride."⁷⁴ The "internal" reasons for phasing out Box 99 are not persuasive.

But the "external" reasons are. They include the current and projected sluggishness of the Canadian economy, the weakening support for, or mounting antipathy to, government involvement in the marketplace, the consequent constraints on federal spending, the growth of alternatives to Box 99 among provincial governments, in the business community and among volunteer organizations, the miniscule impact that Box 99 has had on the body of Canadian con-

sumers, and the relative attractiveness of other consumer assistance initiatives available to the Bureau.

Pinpointing the reasons that do and do not pertain is more than an academic nicety. It makes the difference between a withdrawal that is unfairly construed as yet another outcome of government bungling and one that is accurately seen as a logical response to changing times.

Two objections remain. One is that the withdrawal is opposed by the Consumers Association of Canada. The other is that hands-on complaint handling gives the Bureau grassroots guidance to needed initiatives in consumer's assistance. Neither objection is compelling. CAC's concerns are sincerely held and firmly voiced, but the Association's spokesmen seem not to have shown how the Department would create a vacuum in the marketplace which could only be filled by self-seeking business interests. The second objection -- that CCAC's policymakers would lose an irreplaceable feel for consumers' problems -- will be dealt with in the next section. For now it should only be noted that this is a myth as mistaken as it is durable.

All in all, the heavy weight of argument must favour the Ministry's earlier intention to phase out Box 99.

Recommendation #4

It is recommended that the Bureau of Consumer Affairs discontinue its data bank on complaints and enquiries.

Reasons

The most obvious reason for a withdrawal from this particular program of data-gathering is that it is a logical concomitant of the recommended withdrawal from complaint-handling.

However, even if Box 99 were to remain, the data bank should not. First, its sample is too small. Current contact with a tiny fraction of Canadians is not a basis for understanding all Canadians. Second, its sample is too unrepresentative. Those who contact the Department are simply not typical Canadians. Still less do they include those disadvantaged consumers whom the Bureau should be oversampling. Third, the standard record of a contact is too cryptic to provide the understandings on which insightful policy is built. Indeed, the abandonment of the data-bank might produce the dual benefits of saving money and of underlining the Bureau's need for ongoing instruments for understanding its constituency.⁷⁵

Recommendation #5

It is recommended that the Bureau maintain its consumer help offices.

Reasons

The case for the CHO's is significantly different than the arguments for Box 99. The consumer help offices are aimed at the disadvantaged consumer that the Bureau should emphasize, their main mission is not so much handling individual complaints as raising community consciousness, they fill a role that business organizations cannot play better and, relative to their apparent impact, they are cheap. In other words many of the arguments which tend to vitiate Box 99 tend to justify the CHO's. They should not be dropped.

info. Review

Recommendation #6

It is recommended that the Bureau refine and pursue the role of "coach" to the complaint-handling community.

Reasons

This concept has been endorsed in two separate reports to the Ministry. In 1976 this author suggested that "the Department should consider shifting its strategy from handling complaints and educating consumers to educating sellers and leading complaint handlers."⁷⁶ In 1977 Public Affairs International Ltd. proposed for the Consumer Services Branch, "a new role ... one of a 'coach' rather than just another 'player' in the field of individual assistance."⁷⁷

Each of these proposals was elaborated slightly. The first spoke of "giving integrative leadership to the growing body of organizations which are now involved in complaint handling."⁷⁸ The second referred to "fostering and directing the development of primarily community-based individual consumer assistance resources throughout Canada, and for ensuring that there is an adequate knowledge base upon which such services are provided."⁷⁹

Now there is a need for more precision. Below are some of the specific actions the Bureau could take consistent with the broad construct outlined in the two reports. These options are ordered according to the size of commitment that each would seem to represent for CCAC. In effect, then, going down the list represents moving to more substantial undertakings.

- (a) urging provincial governments to maintain their involvement in consumer assistance
- (b) operating a clearing house and referral center for complaints and enquiries ?
- (c) handling individual enquiries
- (d) handling individual complaints
- (e) tabulation, compilation and dissemination of data on the number and nature of complaints and enquiries

Rec 4?

- (f) suggesting legislative priorities for consumer assistance ✓
- (g) commissioning research aimed at improving consumer assistance ✓
- (h) conducting research aimed at improving consumer assistance ✓
- (i) encouraging complaint and enquiry programs among business and community organizations ✓
- (j) participating in interventions to end chronic complaints from particular industries or businesses ✓
- (k) planning, promoting, and participating in conferences and workshops growing out of the first National Conference on Consumer Assistance ✓
- (l) active associate membership in SOCAP ✓
- ✓(m) developing and promoting common basic standards of performance for individuals and organizations handling complaints and enquiries ✓
- ✓(n) training personnel who are handling complaints and enquiries for community and business organizations ✓
- ✓(o) testing and certifying personnel handling complaints and enquiries for community and business organizations ?
- (p) arbitrating complaints ?
- ✓(q) training arbitrators for CCAC or others' programs ?
- ✓(r) testing and certifying arbitrators ?
- (s) auditing complaint and enquiry programs and agencies and suggesting improvements ?
- ? (t) planning, promoting, and participating in a national organization comprising all agencies engaged in consumer assistance in Canada. ?

The size of the commitment is also governed by the degree to which it is shouldered alone or shared with others. By introducing this variable on another axis, one would produce a grid which would display in fairly fine detail the concrete options which CCAC might choose to invoke in acting out the role of coach. Risks, costs and payoffs could also be entered in each square. If the concept of coach is to take on actionable meaning, this kind of detailed decision-making should be carried through.

One benefit of this approach is that it will help to resolve a controversial proposal which is now before senior strategists.

It is the recommendation put forward by Public Affairs International that there be established a National Council of Consumer Assistance Agencies. This motion met with the "complete disagreement" of a subcommittee of the Canadian Consumer Council. The NCCAA is only roughly sketched -- as the subcommittee emphasized -- yet it would seem to address some of the needs identified in this paper, notably the need to rationalize the uneven coverage of existing schemes and the need, as noted in section III, to promulgate standards of performance of the kind that are detailed in section II.

The grid should also help position and evaluate the idea for a National Centre For Consumer Research and Information -- a proposal which deserves cautious scrutiny not because of opposition from CCC but because of its estimated annual price tag of \$200,000 to \$300,000.

Recommendation #7

It is recommended that the Bureau establish a liaison with leading organizations working to improve complaint handling in the U.S. *OK*

Reasons

The National Conference on Consumer Assistance showed that Canadian practitioners, and Canadian practice, have benefitted very little from the most innovative and successful ideas available in the U. S. From this flows a useful initiative for CCAC. As a pioneer in the past and a coach in the future, the federal government is the most logical organization in this country to bring to the Canadian complaint-handling community the best ideas from other nations.

Several American organizations and individuals are active enough on the frontier to deserve a fact-finding contact by CCAC. These include the Center For Study of Responsive Law, the Office of the Special Assistant to the President For Consumer Affairs, the American Arbitration Association, the Federal Trade Commission, the National Center For Dispute Settlement, and the Consumer Action Panels that operate in the automobile, appliance, carpet and furniture industries.

Others that may warrant exploring are the Consumer Product Safety Commission, the National Institute For Consumer Justice, Consumers Union and the Council of Better Business Bureaus.⁸⁰

The experience of other countries can be opened up to CCAC by tapping the rich international experience of Professor Hans Thorelli of Indiana University.

By tapping these resources, the Department will be exposing itself, and then the larger Canadian complaint-handling community, to innovations in several areas, but probably especially with respect to user orientation, speed, and feedback.

Recommendation #8

It is recommended that the Department proceed promptly to sponsor a conference on improving consumer assistance in remote areas. ✓

Reasons

The strongest single mandate for action to come out of the National Conference on Consumer Assistance was to move on the special problems of consumers in remote areas. These problems are unique, urgent, and amenable to a collaborative attack which perhaps only a government can lead.

As a further incentive for CCAC, a nucleus of people prepared to help mount such an initiative identified themselves at the conference.

It might be added that focussed followup discussions would be evidence of continuing momentum -- something which participants in the national conference must now be doubting they will see.

Further, this initiative is consistent with the priority clientele proposed above, since those in isolated areas are the latest group to be recognized as commercially disadvantaged. To reach out to them is to address, in the most direct way, the problems of access and user orientation.

Recommendation #9

It is recommended that CCAC maintain an effective working relationship with the Canadian headquarters of the Society of Consumer Affairs Professionals and of the Better Business Bureau. ✓

Reasons

The lack of integration of the complaint-handling field in Canada is partly due to the paucity of forums where practitioners could interact. The newly-established chapter of the Society of Consumer Affairs Professionals, located in Toronto, provides one such forum. More precisely, it offers a meeting ground for a fragmented trade, a catalyst for professional development, and a link to U.S. expertise. It should have the Ministry's support.

SOCAP's interests extend well beyond complaint handling. In addition, its regular membership is limited to consumer affairs professionals in business, with others limited to non-voting associate status. In these ways CCAC and SOCAP lack a fully common cause.

However, there is much common ground. The Society's priorities and plans are still unformed enough that, with the presentation of an attractive idea and an offer of shared resources, CCAC might encourage SOCAP to give early attention to helping its members strengthen their abilities in the area of complaint

handling. For example, the Program Committee of SOCAP has given some consideration to making complaint handling the theme of either a regular monthly meeting or of a special workshop or conference. No doubt imagination and goodwill would uncover other possibilities.

Another key enterprise in the Department's organization-set is the Better Business Bureau. Collaboration with BBB would take a different direction. Under its new president, BBB's central office is launching a new (or revised) national program of arbitration. This scheme appears to have been prepared with some care. If it is reasonably sound, it might also help to fill part of the gap created by a trimmed-back Box 99. In principle, then, CCAC should wish to examine the program closely, both to assess its quality and, if appropriate, to encourage its wider availability.

Other possibilities exist. BBB appears to favour the idea of involving CAC in the arbitration program. That could be good for all. If so, the Ministry might serve as an honest broker in bringing together two organizations whose relationships have tended to be arms-length at best.

Recommendation #9 10

It is recommended that the Bureau encourage CAC to enter more fully into individual complaint handling. ✓
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Reasons

The reasons for this proposal are many. Section II would indicate that there is a large unmet need for consumer assistance in Canada. And, as the senior government withdraws from individual complaint-handling, it becomes more important that there be a balanced mix of institutions remaining in the field. This must include a solid representation of consumer organizations.

There may be an economy argument as well. By using volunteers, at least in part, CAC should be able to handle a complaint or enquiry at a lower cost than governments or commercial organizations.

Involvement could also strengthen CAC. Providing consumer services would give volunteers an involving activity that could develop loyalty among those who have been only nominal members of CAC. Additionally, this experience in consumer assistance could give Association members knowledge and experience that would be valuable for other CAC tasks. Too, in return for taking over some consumer-assistance duties from the Department, CAC could make a legitimate case for government funding for operating expenses and for training costs.

This last would in turn help ease the strained relationships between the Ministry and CAC, and would help to reverse the trend whereby governments have assumed tasks which were previously shouldered by citizens themselves through volunteer organizations.

This action would have to be advanced with care. CAC's sensitivities would have to be respected; its impartiality would have to be assured; its expertise would have to be strengthened. On balance, however, the goal seems worth pursuing with all deliberate speed.

This matter was explored in some detail by the author in a presentation to the Annual Conference of CAC in Sackville in May. The outline of that analysis is in Appendix A. If this recommendation were adopted, the author could expand the outline and might be able to make a contribution to bringing it into effect.

VI CONCLUSION

During the period that the field of complaint handling was in its formative stages, the Government of Canada provided early involvement, innovation and leadership. As the field now moves toward a more mature phase, the Department of Consumer and Corporate Affairs has an opportunity to play a role which is different but no less valuable. It is hoped that, by identifying the requirements of an effective redress mechanism, by appraising Canada's current complaint-handling network, and by offering some derivative recommendations to CCAC, this paper will help the Bureau to continue to play and make an appropriate contribution to consumer assistance in Canada.

Footnotes

1. John V. Tunney, "S. 2928 Consumer Controversies Resolution Act", in Sal Divita and Frank McLaughlin (eds.), Consumer Complaints; Public Policy Alternatives (Washington, D.C.: Acropolis Books Ltd., 1975), p. 157.
2. Stanley E. Cohen, "FTC Gears Up For Rule-Making Task; Engman Cite Public's Frustrations," Advertising Age, July 16, 1973, p. 1.
3. Charles S. Mack, "Fair Settlement of Just Consumer Claims", in Divita and McLaughlin, op.cit., p. 163.
4. Alan R. Andreasen and Arthur Best, "Consumers Complain -- Does Business Respond?" Harvard Business Review, July-August, 1977, p. 100.
5. Chris Wheeler, "Evaluating Complaint-Handling Mechanisms," in Divita and McLaughlin, op.cit., p. 163.
6. C.L. Kendall and Frederick A. Russ, "Warranty and Complaint Policies: An Opportunity for Marketing Management," Journal of Marketing, April, 1975, p. 42.
7. Ibid., p. 42.
8. Arthur M. Louis, Fortune, April 28, 1978, p. 53.
9. Robert F. Longenecker, "Complaint Handling by the Consumer Action Panels - MACAP and CRIPCAP", in Divita and McLaughlin, op.cit., p. 61.
10. T. D'Arcy Finn, "The Canadian Experience in Complaint Handling," in Divita and McLaughlin, op.cit., p. 77.
11. Mack, op.cit., p. 168.
12. Paul N. Bloom and Mark J. Silver, "Consumer Education: Marketers Take Heed", Harvard Business Review, January-February, 1976, p.33.
13. Hans B. Thorelli, "Consumer Redress/Directions and Options", in Divita and McLaughlin, op.cit., p. 17.
14. Peter Mears and Robert Cosenza, "The Complaint Letter: Forgotten Communications Medium," Public Relations Journal, n.d., p. 20.
15. See Robert Braucher, "Redress of Consumer Grievances", in Divita and McLaughlin, op.cit., pp. 40-41; Dean W. Determan, "Arbitration; Another Remedy for the Consumer", in Divita and McLaughlin, op.cit., pp. 172-174; Tunney, op.cit., p. 160; and Robert Wixler, Court-Ordered Consumer Arbitration, The Arbitration Journal, n.d., p. 181.
16. Finn, op.cit., pp. 78-79.
17. Wixler, op.cit., p. 176, 180.
18. Patricia A. Chapman, "Consumer Affairs", Stores, October, 1977, p. 57.

19. Kendall and Russ, op. cit.
20. Gerard N. Murphy, "Complaint-Handling By The Consumer Action Panels - AUTOCAP", in Divita and McLaughlin, op. cit., p. 54.
21. M. Elizabeth Harford, "The FTC Looks at Consumer Complaints", in Divita and McLaughlin, op. cit., p. 120.
22. Determan, op. cit., p. 173. For a detailed example, see also Wexler, op. cit., p. 179-180.
23. Wexler, op. cit., p. 179.
24. R. William McNealy, "Consumer Complaints and Corporate Policy", in Divita and McLaughlin, op. cit., p. 33.
25. Alasdair J. McKichan, "Building Confidence in the Marketplace", an address to the National Conference on Consumer Assistance, Ottawa, Canada, October 6, 1978, p. 7.
26. Thorelli, op. cit., p. 13.
27. H. Keith Hunt, (ed.), Conceptualization and Measurement of Consumer Satisfaction and Dissatisfaction, (proceedings of a conference conducted by the Marketing Science Institute with support of the National Science Foundation , Chicago, 1976).
28. Andreason and Best, op. cit.; Kendall and Russ, op. cit.; and Mel S. Moyer, Margaret Maciver, Dagmar Stapl, and Marika Prymych, Ontario Consumer Issues (Toronto: Ministry of Government Services, Government of Ontario, 1978).
29. Wheeler, op. cit., p. 104.
30. Longenecker, op. cit., pp. 63-64.
31. Ibid., pp. 53-54.
32. Mel S. Moyer and John C. Banks, "Industry Self-Regulation: Some Lessons from the Canadian Advertising Industry," in Donald N. Thompson (ed.), Problems in Canadian Marketing (Chicago: American Marketing Association, 1977), pp. 190-197.
33. Wheeler, op.cit., p. 99.
34. Longenecker, op.cit., p. 63
35. Phil Broman, "Recommendations for Changes in Handling Consumer Complaints at the Corporate Level," in Divita and McLaughlin, op.cit., p. 88.

36. Constance B. Newman, "Consumer Complaints/Their Role in Product Safety," in Divita and McLaughlin, op.cit., pp. 123-128.
37. Mel S. Moyer, from a report to the management of a major Canadian complaint-handling operation, 1976.
38. Determan, op.cit., p. 174.
39. Seymour Fogelson, Chapman, op.cit., p. 58.
40. John W. Macy, Jr., "Business Response: Self Regulation," in Divita and McLaughlin, op.cit., p. 142.
41. Robert Coulson, "The Voice of the Consumer: But Where?" in Divita and McLaughlin, op.cit., p. 110.
42. Murphy, op.cit., and Longenecker, op.cit., pp. 51-70.
43. Finn, op.cit., pp. 78-79.
44. Moyer and Banks, op.cit., pp. 190-197.
45. Virginia H. Knauer, "Consumer Redress/Some Encouraging Signs," in Divita and McLaughlin, op.cit., p. 24.
46. Lillian C. Woo, quoted in Mack Webb, "Consumer Groups Criticize Ford's Appeal Board," Automotive News, November 21, 1977, p. 28.
47. See, for example, Moyer and Banks, op.cit.
48. Tunney, op.cit., p. 159.
49. Kendall and Russ, op.cit., p. 41.
50. Avery Comarow, "Gripping That Gets Action", Money, April, 1976, p. 63.
51. Charles R. Day, Jr., "Shouldering Customer Complaints Needn't Turn Knuckles White", Industry Week, January 9, 1978, p. 64.
52. Andreason and Best, op.cit., and Kendall and Russ, op.cit.
53. Kendall and Russ, op.cit., p. 41.
54. Andreason and Best, op.cit., p. 101.
55. Chapman, op.cit., p. 57.
56. Andreason and Best, op.cit., p. 101.
57. Broman, op, cit., p. 86.
58. Ibid., and McNealey, op. cit.

59. Betty J. Diener and Stephen A. Greyser, "Consumer Views of Redress Needs," Journal of Marketing, October, 1978, pp. 21-27.
60. Thorelli, op. cit., p. 8.
61. William M. Evan, "Toward A Theory of Inter-Organizational Relations, in Louis W. Stern (ed.), Distribution Channels: Behavioral Dimensions (New York: Houghton Mifflin Company, 1969), pp. 75-83.
62. Murphy, op. cit., p. 56.
63. Ralph M. Gaedeke, "Filing and Disposition of Consumer Complaints: Some Empirical Evidence," The Journal of Consumer Affairs, Summer, 1972, p. 53.
64. Thorelli, op. cit., p. 16.
65. Knauer, op. cit., p. 27.
66. A bibliography of that literature is provided in Appendix C of Mel S. Moyer (ed.) Complaint Handling in Canada: Toward A Better Network (Ottawa: Government of Canada, 1979).
67. See Mel S. Moyer, A Plan For Evaluating Standards of Service In Complaint Handling in the Department of Consumer and Corporate Affairs, June, 1976, pp. 36-37.
68. Ibid., p. 14. For an elaboration and documentation of the three trends cited, see ibid., pp. 11-15.
69. For a more detailed argument to this effect, see ibid., pp. 15-18.
70. Ibid., p. 16.
71. National Conference on Consumer Assistance, A Report From the Conference Secretariat, October, 1978, p. 5.
72. Public Affairs International Ltd., Rationalization of the Individual Assistance Services of the Consumer Affairs Bureau of Consumer and Corporate Affairs Canada; Progress Report #2, August 18, 1977, p. 8.
73. Canadian Consumer Council, CCAC's Possible Adaption of a New Role in the Area of Individual Assistance, March 3-4, 1978, p. 4.
74. Mel S. Moyer, A Plan For Evaluating Standards of Service in Complaint Handling in the Department of Consumer and Corporate Affairs, June, 1976, p. 36.
75. These arguments are more fully developed in ibid., pp. 46-47.

76. Ibid., p. 7.
77. Public Affairs International Ltd., op. cit., p. 8.
78. Moyer, op. cit., p. 42.
79. Public Affairs International Ltd., op.cit., p. 8.
80. Outlines of the activities of most of these organizations can be found in Divita and McLaughlin, op. cit.

APPENDIX A

CONSUMER ASSISTANCE AND CAC: WHERE TO NOW?

Summary Notes For A Workshop
At The National Conference Of

The Consumers Association of Canada

at

Mount Allison University
Sackville, N.B.

June 11-13, 1979

Prepared by

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CONSUMER ASSISTANCE AND CAC: WHERE TO NOW?

Mel S. Moyer

TOPICS

- I EVIDENCE THAT CONSUMER ASSISTANCE
IS ENTERING A NEW PHASE IN CANADA
- II SOME ALTERNATIVES AVAILABLE TO CAC
AS CONSUMER ASSISTANCE ENTERS A NEW PHASE
- III SOME PROS AND CONS OF CAC
CHOOSING AN ALTERNATIVE
OF MORE ACTIVE INVOLVEMENT IN CONSUMER ASSISTANCE
- IV DISCUSSION OF ALTERNATIVES
- V CO-ORDINATOR'S SUMMARY: GETTING IT DONE

I EVIDENCE THAT CONSUMER ASSISTANCE
IS ENTERING A NEW PHASE IN CANADA

1. The federal government has been partially withdrawing from the handling of complaints and enquiries in Canada, and it seems reasonable to expect that this will not be reversed under the Conservatives.
2. The Better Business Bureau, trade associations like the Retail Council of Canada, and individual companies will probably be ready to take a more leading role in consumer assistance.
3. The recently-established Canadian Chapter of the Society of Consumer Affairs Professionals in Business (SOCAP) located in Toronto, represents a potential focus for industry-led initiatives in the consumer assistance field.
4. The National Conference on Consumer Assistance, held in Ottawa in October, 1978, provided the first country-wide meeting ground for those engaged in consumer assistance in business, government, the media and consumer associations.
5. The published proceedings from that conference will represent the first effort to summarize the status of consumer assistance in Canada and to suggest future directions for it.

III SOME PROS AND CONS OF CAC CHOOSING AN ALTERNATIVE OF MORE ACTIVE INVOLVEMENT IN CONSUMER ASSISTANCE

CONS

1. Individual consumer assistance uses large amounts of time and personnel resources. CAC could get "locked in" in that once complaint and enquiry services are offered, it could give CAC a bad image if it were to withdraw.
2. CAC has many other worthy priorities.
3. Complaint handling services, consumer information and consumer education tend to be used most by those who need it least, and vice versa and this is hard to change.
4. Those who run consumer assistance programs in the private sector and in government can put more resources into training their people and publicizing their programs than can CAC.
5. Through SOCAP, business organizations can act jointly to upgrade and publicize their consumer assistance programs in a way that a decentralized CAC cannot.
6. CAC, and therefore its consumer assistance services, are generally far less well known than those of BBB.
7. To be fully available, especially to disadvantaged consumers, complaints and enquiry services should be well publicized -- which can generate a flow of requests larger than the program's capacity.
8. If chronic complaints are not dealt with by intervention to stop the malpractice which causes the difficulty, then there is a loss of morale and a waste of resources among complaint-handlers.

9. Because CAC tends to set its priorities and take its initiatives locally rather than nationally, this could reduce its effectiveness in mounting consumer assistance programs.
10. By limiting itself to some of the actions which involve much leadership but lower costs (eg. #'s 1,5,8,9,10,13, 16,17 and 18 in section II above) CAC might be able to bring about something like the consumer assistance system it wants with a modest outlay of its own resources.

PROS

1. Because existing complaint and enquiry services are often unknown or inaccessible or unco-ordinated or overburdened, there is a large unmet need for consumer assistance in Canada.
2. Activities which increase consumer information and consumer redress serve several of the basic objectives of CAC.
3. CAC could bring a more impartial, or at least a different, view to settling complaints and providing product information, than BBB and private businesses.
4. As governments withdraw from handling complaints and enquiries, it becomes more important that there be available a consumer organization alternative to the consumer services offered by the business community.
5. By using volunteers, at least in part, CAC should be able to handle a complaint or enquiry at a lower cost than governments or commercial organizations.

6. CAC could provide a fieldforce which would provide geographic coverage of the market at least as complete as any other organization in the public or private sector.
7. Direct involvement in consumer assistance could give CAC more experience and credibility in speaking for disadvantaged consumers.
8. Providing consumer assistance services would give volunteers an involving activity that could develop loyalty among those who have been only nominal members of CAC.
9. Experience in consumer assistance could give CAC members knowledge and experience that would be valuable for other CAC tasks.
10. Via associate membership, in SOCAP, CAC might be able to get the benefits, in terms of improved consumer assistance programs, that accrue to members in the private sector.
11. In return for taking over some consumer assistance duties as governments withdraw from it, CAC could make a strong case for government funding, both for operating expenses and for training costs.
12. To the extent that it is known to the public, CAC is seen in a light that is favourable and consistent with consumer assistance.
13. As other organizations take initiatives in this field, the opportunity for CAC to define its own future here will shrink.

14. The current emphasis on and approval of deregulation and decentralization and volunteerism may favour CAC involvement.
15. By more active involvement, CAC could contribute to an improved national network of consumer assistance agencies and programs in Canada.

V CO-ORDINATOR'S SUMMARY: GETTING IT DONE

1. The need for strategy to get it done: limited resources, unlimited ends
2. Steps in getting it done
 - a) evaluate consumers' needs for complaints and enquiry services (who needs what help?)
 - b) evaluate CAC capabilities and limitations in offering complaints and enquiry services (what do we -- and do we not -- have going for us?)
 - c) matching up a) and b), choose service clienteles and specific services (who are our kinds of people and what are our kinds of services?)
 - d) outline an unfolding sequence of service and clientele development (what happens to whom first ... and second ... and ... ?)
 - e) set specific goals in realistic numbers, not inflated words, (what are we determined to accomplish?)
 - f) set deadlines for accomplishment (when will we compare our objectives to our accomplishment?)
 - g) set dates for review (by when?)
 - h) calculate needed resources (what horses will it take?)

- i) assign responsibility (where does the buck stop?)
- j) review and revise (how did we do and how can we do better?)

3. Do it.