



Deaf-Blind Planning Committee (DBPC)
227 Sixth Street
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Terri Nolt
Chairperson
Deaf-Blind Planning Committee (DBPC)

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Reference: [1011-NOC2024-0137](#)

Mr. Marc Morin
Secretary-General
Canadian Radio-television and Telecommunications Commission (CRTC)
sec-gen@crtc.gc.ca

Dear Mr. Morin,

Re: CRTC 2024-137 Support for Extension Request for Deaf-Blind Accessibility

This letter has two purposes: 1) to respond to the letter from CNSDB requesting for additional time for the purposes of Deaf-Blind participating in the survey with the support of intervenors, as well as 2) respond to the Canada Deaf Grassroots Movement (CDGM) document regarding CNSDB's request for a brief extension for the survey results.

Response to CNSDB's Letter of Request

1. First, as Chair of the Deaf-Blind Planning Committee (DBPC), I would like to express that our organization fully supports the Canadian National Society of the Deaf-Blind (CNSDB) 's request for a two-week extension on the survey deadline for the CRTC 2024-137 consultation of captioning on online streaming platforms based on the intervenor supports required for full participation of Deaf-Blind individuals with the ongoing survey.
2. Deaf-Blind individuals do face unique challenges in accessing and completing online surveys. While some may have residual sight and can complete the online surveys, the navigation through the questions can be daunting and challenging, which requires Intervenor (IV) assistance to assist with steering around the online platform and the document with the questions. This can include reading or

signing in tactile sign language the questions, responses, and even the simple pointing of where to enter responses.

3. The DBPC confirms that the current timeline does not allow sufficient time for Deaf-Blind individuals to arrange these necessary services, which may prevent full participation in the consultation process.
4. Extending the deadline by two weeks would provide Deaf-Blind Canadians the opportunity to engage meaningfully with this survey, ensuring that their perspectives are represented in this critical discussion on closed captioning and accessibility.
5. By accommodating the specific needs of Deaf-Blind individuals, we can ensure a more comprehensive and representative response from the DDBHH community.

Response to CDGM's Procedural Response

6. In the response from CDGM, while we see the validity of addressing procedural timelines, we do not accept the fact that their document regrettably overlooked the specific accessibility requirements of Deaf-Blind Canadians. This demonstrates that the CDGM has a lack of understanding of the serious accessibility challenges Deaf-Blind Canadians face.
7. As organizations advocating for diverse communities within the Deaf, Deaf-Blind, and hard-of-hearing (DDBHH) spectrum, DBPC believe that CDGM's comments should recognize these unique needs, rather than focusing solely on deadlines. True fairness means recognizing the varied experiences of Deaf, hard-of-hearing, and Deaf-Blind individuals.
8. The CNSDB's request for an extension is essential to ensure that Deaf-Blind Canadians have an equitable opportunity to contribute to critical regulatory discussions on closed captioning accessibility. CDGM's letter implies that deadlines were ample for all parties but fails to consider that Deaf-Blind participants depend on accommodations and support services that often require additional time. Dismissing this reality is inappropriate and risks excluding Deaf-Blind voices. As participating DDBHH Canadian stakeholder groups, all DDBHH groups should demonstrate a commitment to inclusivity and equity.
9. In the spirit of procedural fairness for all, if the Commission deems it appropriate to grant our requested extension, we support CDGM's proposal that this extension be applied universally, allowing all interested parties to benefit equally

from the additional time. Our intent is to foster an inclusive environment where all communities are given a fair opportunity to participate without compromising the quality of input due to constraints that disproportionately affect certain groups such as the Deaf-Blind.

Support of Extension and Concluding comments

10. The DBPC respectfully requests that CDGM and other stakeholders recognize the importance of accessibility and value an inclusive approach that reflects the diversity within our community.
11. The DBPC believes that supporting this extension aligns with the CRTC's commitment to inclusion and accessibility. By accommodating the specific needs of Deaf-Blind individuals, we can ensure a more comprehensive and representative response from the DDBHH community.
12. The DBPC and members of DWCC et al. leave it to the Commission to decide the new dates in respect to 2024-137-1 to allow for the accessibility for Deaf-Blind Canadians.
13. The DBPC looks forward to working with the Commission and other advocates to ensure that the voices of all Canadians—Deaf, hard-of-hearing, and DeafBlind—are meaningfully represented.

Thank you for your attention to this matter and considering this request. As Chair, I urge you to approve this extension to facilitate full participation that includes sufficient numbers of Deaf-Blind participants.

Sincerely,

Terri Nolt, Chair
Deaf-Blind Planning Committee (DBPC)