

**August 16, 2024**

Mr. Marc Morin  
Secretary-General  
Canadian Radio-telecommunications and Telecommunications Commission (CRTC)  
[sec-gen@crtc.gc.ca](mailto:sec-gen@crtc.gc.ca)

and

The CRTC Public Hearing Team  
Public Hearings, Canadian Radio-television and Telecommunications Commission (CRTC)  
Ottawa, ON K1A 0N2  
[hearing@crtc.gc.ca](mailto:hearing@crtc.gc.ca)

**VIA EMAIL DISTRIBUTION and GC KEY**

**Re: DDBHH Accessibility for BNC CRTC 2024-137: Development of a regulatory policy for closed captioning provided by online streaming undertakings**

Dear Secretary General,

1. It is the intent of the Deaf Wireless Canada Consultative Committee (DWCC) to participate in the above proceeding. While we intended to submit an initial intervention and an ASL summary, and possibly an LSQ summary, for this proceeding by the deadline of August 19th, we are submitting this procedural letter to request an extension based on three concerns related to the accessibility for Deaf, Deaf-Blind and Hard of Hearing (DDBHH) Canadians to participate.
2. While the DWCC itself did not initially intend to participate, since broadcasting is not normally a part of our mandate, we have been urged by other consumer groups and individuals to fill the gap for at least this proceeding. The DWCC has expertise and experience in Commission proceedings, access to the relevant communities, and a sense of responsibility to our community, especially with the growth of streaming applications on wireless devices.
3. The DWCC reaffirms that it is preparing an intervention to answer the 16 questions for this proceeding. DWCC fully intended to submit an initial intervention and an ASL summary for this proceeding on time, on August 19th, however it is submitting this procedural letter to address three issues with a formal request for an extension based on the three concerns.
4. The three concerns are:
  - a. **Low number of respondents for this proceeding to date, which we believe is due to a lack of awareness and the awkward timing of the proceeding;**
  - b. **Complaint statistics 2015-2023;**

**c. Need for a survey to gather insights from DDBHH Canadians**

**A. Low number of respondents for this proceeding due to lack of awareness and awkward timing**

5. As of August 9th, only nine interventions have been filed on record (8 English, 1 French), and only one identifies as being Deaf. This is a very low participation rate, and raises concerns about adequate comment from the prime captioning audience. This proceeding is about captioning which is widely used by Deaf, Deaf-Blind and Hard of hearing (DDBHH) for their accessibility. It is an accessibility topic that is incredibly **essential** for greater numbers of DDBHH participation.

a. **Timing:** The DWCC believes the timing of this proceeding fails to take into consideration the fact that people are busy in the summer months. In the Deaf community, for example, the summer features a national conference in Halifax, a Deaf youth camp in B.C., the Annual General Meetings of several Deaf community groups, and other events, including sporting events. There are also the distractions of events not directly concerning the Deaf community but in which Deaf people and organisations participate, such as the various Pride parades, and obviously the Olympic Games in Paris. Currently, there is energy directed toward ASL and LSQ translation and interpretation of Olympic events on the CBC Gem online platform application as well as through Radio-Canada Television.

b. **No dedicated group:** Unfortunately there is currently no DDBHH organization that focuses on broadcasting accessibility as its top priority. This has led to an apparent lack of information sharing and community notification of the Commission's proceeding.

c. **LSQ Organizations & Communication Linguistic Barriers:** We are concerned with the special challenges facing LSQ/French organizations that wish to participate in the proceeding. It is a huge challenge to ensure equality of information for LSQ/French participation within the Commission's current deadline. The DWCC has reached out to a Quebec-based DDBHH organization called REQIS which has previously been active in broadcasting accessibility (see [link](#)) on behalf of the LSQ community. DWCC found that this organization was unaware of this proceeding. While we are negotiating with REQIS to develop a cooperative plan of action, communication has been challenging due to the linguistic differences between our primarily English-speaking organization, which includes only a small group of French/LSQ members, and the fully francophone organization that is REQIS. Overcoming these language barriers will take time, and we are committed to ensuring a symbiotic relationship through careful and thoughtful communication.

d. **LSQ equivalent Awareness:** Vinu Abraham Chetipurackal who is currently [BNC CRTC 2024-137 intervention #1](#), nudged Lisa Anderson, who has experience with CRTC and [interviewed her](#) via the [Accessibility Views](#) platform to get the word out there about this proceeding, which is fantastic. Additionally, the media outlet DeafDots interviewed Jeff back in July however only just published about the proceeding on August 9th, [see link](#). The timing is late, and unfortunately the reality is there is a lack of time to ensure equality and equal access to information for LSQ/French about the BNC CRTC 2024-137 proceeding to the LSQ community which is unfair.

6. REQIS, having just obtained the information, will require more time to review the proceeding questions. As the Commission is aware, captioning in the French language is a very different matter from captioning in the English language, and their expertise is crucial to an informed submission to the Commission. This will be the same for other Deaf, Deaf-Blind and Hard of hearing organizations, particularly the Deaf-Blind, that we might be able to seek out their input and feedback for the intervention and development of survey questions.
7. Based on these facts, the DWCC recommends that there be an extension of one full month to the revised deadline of **September 19, 2024**. Based on the NOC, DWCC estimates the deadline for replies would be **October 7, 2024**.

## **B. Complaint statistics**

8. DWCC is aware of the captioning-complaint data set out in the CRTC release package for CRTC file number A-2024-00021 (Ottawa, July 23, 2024). Based on this data, we understand that the highest number of complaints regarding captioning by DDBHH Canadians which the CRTC said it received was in 2016, with a total of 220 complaints, while the lowest was in 2023, with only 37 complaints.
9. It is our belief that filed complaints are not reflective of the actual experiences of DDBHH Canadians, simply because the complaint process is not “Deaf-friendly” enough. In addition, from anecdotal and social interactions, our members have experienced a high level of complaints about captioning that have been expressed person-to-person rather than “jumping through the hoops at the CRTC”; these complaints convince us that there is a far higher degree of discontent and concerns with captioning of programs than are reflected in the available formal data. A survey conducted by members of the DDBHH community itself is called for in order to obtain more detailed and accurate data. The DWCC itself is well-established and deeply experienced in conducting such surveys; we feel confident we could secure at least 200 responses from ASL and LSQ accessible surveys that are inclusive of those who are Deaf-Blind.

## **C. Submission of a proposed supplementary Survey Analysis report to gather DDBHH Canadian insights**

10. DWCC reaffirms our intention to submit a response to the proceeding; however, we request time additionally to collect evidence and perspectives from a wider pool of ASL and LSQ Canadians through qualitative and quantitative surveys for this proceeding.
11. DWCC strongly believes it will benefit the Commission to have more perspectives shared from DDBHH Canadians in order to develop a comprehensive accessibility policy. We remind the Commission of the abiding guideline of the federal Accessible Canada Act: “Nothing about us without us.”
12. DWCC therefore requests a separate submission deadline and response date for proceeding participants to reply and make comments with the results of the perspectives derived from the survey respondents. Upon approval, the DWCC can submit a survey analysis report by **November 13, 2024**, with the deadline for other parties/respondents to comment or query on the survey results set for **December 9, 2024**.
13. The timeline proposed to allow us to undertake a public survey is also subject to the availability and resources of potential collaborators:
  - **Aug 19:** Comments deadline **extended to Sept 19**
  - **Aug 20:** English survey questions brainstorm

- **Aug 23:** French translations complete
- **Aug 30:** Finalize questions with Joint collaborators; ASL & LSQ translations begin
- **Sept 6:** ASL & LSQ promo videos/scripts complete; draft social media posts
- **Sept 13:** ASL & LSQ videos on YouTube; Mailchimp setup
- **Sept 19-21:** Integrate ASL & LSQ videos into Survey Monkey, testing survey
- **Sept 23:** Survey launch with promo videos and social media posts
- **Oct 15:** Survey ends; data extraction begins
- **Oct 19-26:** Data analysis and report drafting
- **Nov 13:** Submit survey results to CRTC
- **Dec 9:** Replies deadline, proceeding closed

14. We attach an appendix listing potential survey questions. We would appreciate that note that the current draft is subject to further edits or adjustments especially if there are potentially joint collaborators for the survey.

15. Thank you for taking your time to consider our concerns, viewpoints and requests.

Best regards,

Jeffrey Beatty, Chair  
Deaf Wireless Canada  
Consultative Committee (DWCC)

Cc: CRTC staff

All parties of CRTC 2024-137:

Intervention #1 Vinu Chetipurackal [vinuac@hotmail.com](mailto:vinuac@hotmail.com)

Intervention #2 Dorothy Skrlj [Skrlj@shaw.ca](mailto:Skrlj@shaw.ca)

Intervention #3 Gent Ng [gng11@yahoo.com](mailto:gng11@yahoo.com)

Intervention #4 Élise Doucet [elisejdoucet@gmail.com](mailto:elisejdoucet@gmail.com)

Intervention #5 Rebecca Darling [becca.a.darling@gmail.com](mailto:becca.a.darling@gmail.com)

Intervention #6 Mark Crocker [Mark@markcrocker.ca](mailto:Mark@markcrocker.ca)

Intervention #9 Jonathan Jacques Labelle [jjlprof@gmail.com](mailto:jjlprof@gmail.com)

Intervention #10 Rhea McKinlay [miss.rheamoss@gmail.com](mailto:miss.rheamoss@gmail.com)

Intervention #12 Marie Collin, Télé-Québec [dgourgues@telequebec.tv](mailto:dgourgues@telequebec.tv)

Intervention #12 Dominic Gourgues, Télé-Québec [dgourgues@telequebec.tv](mailto:dgourgues@telequebec.tv)

Intervention #13 Laurie Landry [laurie@laurielandry.com](mailto:laurie@laurielandry.com)

Intervention #14 Lucas Da Costa [ldaco036@uottawa.ca](mailto:ldaco036@uottawa.ca)

Intervention #15 Annie G. [nfinity-Infinite@tbs-sct.gc.ca](mailto:nfinity-Infinite@tbs-sct.gc.ca)

Intervention #16 Monica. L. Auer, FRPC [execdir@frpc.net](mailto:execdir@frpc.net)

Intervention #17 D Ballard [darrinballard13@gmail.com](mailto:darrinballard13@gmail.com)

Intervention #18 Jeanne Choquette, Audition Québec [presidence@auditionquebec.org](mailto:presidence@auditionquebec.org)

Intervention #19 Steven James May [steven.may@humber.ca](mailto:steven.may@humber.ca)

DWCC Committee members, [regulatory@deafwireless.ca](mailto:regulatory@deafwireless.ca)

Lucie Nault, REQIS

Louis Belleau, REQIS

Attached: Proposed Draft of Survey Questions for DDBHH Canadians

## Survey: Closed Captioning on Online Streaming Services

### 1. Demographics:

- Age group: [18-24] [25-34] [35-44] [45-54] [55-64] [65+]
- Gender: [Male] [Female] [Non-binary] [Prefer not to say]
- Race/Ethnicity: [Indigenous] [White] [Black or African American] [Hispanic or Latino] [Asian] [Middle Eastern] [Other (please specify)] [Prefer not to say]
- Location: [Urban] [Suburban] [Rural]
- Hearing Status: [Deaf] [Deaf-Blind] [Hard-of-Hearing] [Other]
- Visual Status: [Sighted] [Low Vision] [Blind] [Other]

### 2. Devices Used:

- What primary device do you use for online streaming? [Phone] [Tablet/iPad] [Laptop] [Desktop] [Smart TV]
- Which other devices do you use for streaming? [Tablet/iPad] [Apple TV] [Laptop] [Desktop] [Other]

### 3. Streaming Platforms:

**Which online streaming services do you use regularly? (Select all that apply)**

- Apple TV+
- Amazon Prime Video
- Disney+
- Hayu
- Netflix
- OUTtvGo app
- Sundance Now
- Paramount+
- Other (please specify): \_\_\_\_\_

### 4. Canadian Streaming Platforms and Apps:

**Which Canadian online streaming platforms and apps do you use regularly? (Select all that apply):**

- CBC
- CBC Gem
- Crave
- CTV
- CPAC
- Radio-Canada TV
- Other (please specify): \_\_\_\_\_

### 5. Canadian Cable Company Apps

**Which Canadian Cable Company online streaming platforms and apps do you use regularly? (Select all that apply):**

- Telus Optik TV+ App
- Rogers with Shaw Ignite TV app
- Bell Fibe TV app

- Global TV App
- Stack TV
- Other (please specify): \_\_\_\_\_

**5. Sports Streaming Platforms and Apps:**

**Which Sports online streaming platforms and apps do you use regularly? (Select all that apply):**

- DAZN
- NHL App
- SportNet
- TSN
- Other (please specify): \_\_\_\_\_

**6. Quality of Captions:**

**For the platform or application of Online Streaming,** on a scale of 1-5, how would you rate the quality of closed captions on the streaming platforms you use? (1 = Poor, 5 = Excellent)

Have you encountered issues with closed captions on these platforms? [Yes] [No]

If yes, what issues have you experienced? Please check all that apply. (e.g., synchronization issues, missing captions, poor translation), please describe the issues with the closed captions on these platforms: [text or ASL response]

**For the platform or application of Canadian Streaming,** on a scale of 1-5, how would you rate the quality of closed captions on the streaming platforms you use? (1 = Poor, 5 = Excellent)

Have you encountered issues with closed captions on these platforms? [Yes] [No]

If yes, what issues have you experienced? (e.g., synchronization issues, missing captions, poor translation), please describe the issues with the closed captions on these platforms: [text or ASL response]

**For the platform or application of Canadian cable streaming** on a scale of 1-5, how would you rate the quality of closed captions on the streaming platforms you use? (1 = Poor, 5 = Excellent)

Have you encountered issues with closed captions on these platforms? [Yes] [No]

If yes, what issues have you experienced? Please check all that apply. (e.g., synchronization issues, missing captions, poor translation), please describe the issues with the closed captions on these platforms: [text or ASL response]

**For the platform or application of Sports Streaming**

on a scale of 1-5, how would you rate the quality of closed captions on the streaming platforms you use? (1 = Poor, 5 = Excellent)

Have you encountered issues with closed captions on these platforms? [Yes] [No]

If yes, what issues have you experienced? Please check all that apply. (e.g., synchronization issues, missing captions, poor translation), please describe the issues with the closed captions on these platforms: [text or ASL response]

### **7. Accessibility for those with visual disabilities:**

Do you require adjustments to the captions for accessibility? [Yes] [No]

- If yes, which adjustments do you need? (Select all that apply)
  - Font size adjustment, for example, larger size text
  - Font color adjustment, for example, white, yellow, orange
  - Font type adjustment, for example, bold
  - Background color adjustment, for example, dark black or see-through gray background
  - Other (please specify): \_\_\_\_\_

### **6. Complaint Process:**

- Are you aware of where to file complaints about captioning issues? [Yes] [No]
- Do you find the complaint system accessible? [Yes] [No]
- Do you prefer direct video communication in your sign language to make these complaints? [Yes] [No]
- Where do you prefer to file these complaints?  
CRTC  
CCTS-CPRST  
I don't know
- What method do you prefer for submitting complaints about captioning? (Select all that apply)
  - [Email]
  - [Direct video communication]
  - [Video Relay Service (VRS)]
  - [Other (please specify)]

### **7. Open Comments:**

- Do you have any additional comments or suggestions regarding closed captioning on online streaming platforms?
- Would you like to refine or add anything to this list?

**\*\*\* END DOCUMENT\*\*\***