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**November 11, 2024**

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

**VIA EMAIL DISTRIBUTION and GC KEY**

**Reference: 1011-NOC2024-0137**

Dear Mr. Morin,

**Re: Support for FRPC's Recommended Extension Dates for CRTC 2024-137**

On behalf of the Deaf Wireless Canada Committee (DWCC) and its affiliated organizations, as DWCC et al., we are writing to respond to the Forum for Research and Policy in Communications (FRPC)'s recommended extension dates regarding BNC CRTC 2024-137

1. DWCC et al. expresses our strong support for the FRPC's recommended extension dates regarding CRTC 2024-137.
2. DWCC et al believes that adopting these revised timelines will provide equitable participation opportunities for all stakeholders, including Deaf, Deaf-Blind, and Hard of Hearing (DDBHH) communities.

**Rationales for Supporting Extended Deadlines**

**Addressing Preparation Time Disparities**

3. As FRPC highlighted, there exists a significant discrepancy in the time allocated for preparation between broadcasters and accessibility organizations. Broadcasters were notified of the CRTC's interest in closed captioning nearly six months prior to accessibility groups, which has impacted the ability of our organizations to gather data and prepare responses. DWCC et al. believes that by extending the deadlines as suggested by FRPC would help balance this disparity and allow the DDBHH community to participate fully.

**Inclusion of New Data and Research**

4. DWCC et al's ongoing survey is gathering vital data that will contribute significantly to the public record on accessibility in online broadcasting.
5. Thus extending the submission deadline to December 2, 2024, with a reply deadline of January 20, 2025, will ensure that this critical data is included and that all stakeholders have sufficient time to respond meaningfully to these findings.

### **Alignment with CRTC's Commitment to Accessibility**

6. The CRTC has committed to enhancing accessibility, openness, and inclusivity in regulatory processes. Supporting FRPC's proposed dates is consistent with these goals and demonstrates a respectful, proactive approach to accommodating the unique needs of accessibility organizations and the DDBHH community.

### **Conclusion**

7. DWCC et al. respectfully urges the Commission to adopt FRPC's suggested extension dates, allowing for a December 2, 2024, deadline for interventions and a January 20, 2025, deadline for replies.
8. DWCC et al. are confident that this adjustment will lead to a more comprehensive and equitable review process, ensuring that the perspectives of the DDBHH community are adequately represented.

Thank you for your attention to this matter, and we appreciate your consideration of our support for FRPC's recommendation.

Sincerely,

Jeffrey Beatty, Chair  
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\*\*\*END\*\*\*