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VIA EMAIL DISTRIBUTION and GC KEY
January 2, 2025

Mr. Marc Morin
Secretary General
Canadian Radio-television and Telecommunications Commission (CRTC)
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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

Subject: Procedural Response to TNC CRTC 2024-288 - The Path Forward

Reference: Public record: 1011-NOC2024-0288

Dear Secretary General,

1. The Deaf Wireless Canada Consultative Committee (DWCC) respectfully submits this procedural response regarding Broadcasting Notice of Consultation CRTC 2024-288, "The Path Forward."
2. DWCC advocates for the full inclusion of diverse members within the Canadian Deaf, Deaf-Blind and Hard of Hearing (DDBHH) community in Canadian society. The spectrum of DDBHH life experiences, including those that are Indigenous and 2SLGBTQIA+, and range from those with cognitive delay or have neurodiversity, immigrants learning English or French as a second language, those with various degrees of hearing loss, those with the unique "double" disability as Deaf-Blind, and finally native ASL/LSQ users. Additionally, DWCC supports that Indigenous have the right to ask for support, including requesting Indigenous Sign Language interpreters. When DWCC writes the term "DDBHH," it is inclusive of all those with intersectional identities.

3. DWCC's mandate is to advocate for accessible wireless communications equity for DDBHH Canadians, including but not limited to:
 - a. Cost-reasonable accessible wireless data plans for ASL and LSQ users for two-way video calls.
 - b. Accessible industry-wide promotions of wireless services and products.
 - c. Removal of disparities in costs of the same accessible wireless products and services within each company.
 - d. Provision of functional equivalent wireless products and services, including wireless applications (apps).
 - e. Accessible wireless emergency services (including emergency alerts and direct text to 911).
 - F. Nationwide public awareness, education and outreach on currently accessible wireless and mobile communication products and services
4. We have carefully reviewed the submissions by following, Motion Picture Association of Canada's (MPA-Canada) sent on November 27, 2024, Forum for Public Research of Canada (FRPC) on December 2, 2024 and Public Interest Advocacy Centre (PIAC) on December 4, 2024, along with their respective calls for a procedural extension and clarity on timelines.

I. Support for Timeline Extension

5. DWCC fully supports the Motion Picture Association of Canada's (MPA-Canada) request to extend the deadline for interventions to February 20, 2025, and the reply deadline to March 14, 2025. As a non-profit organization advocating for the Deaf, Deaf-Blind, and Hard of Hearing (DDBHH) communities, we emphasize the critical need for sufficient time to gather diverse perspectives and prepare evidence-based interventions.

II. Resource and Accessibility Challenges

6. Aligned with PIAC's concerns, we face significant challenges in mobilizing our limited resources to address multiple overlapping consultations, especially during the holiday season. For equitable participation, it is vital to provide an extended timeline, allowing consumer groups, including DWCC, to ensure full representation of accessibility issues and recommendations tailored to the unique needs of our community.
7. Note that the DWCC will participate in providing its qualitative evidence-based research, interviewing between 20-30 Deaf organizations and individuals, including media organizations, and theatre and creativity groups and organizations to collect their perspectives on the main questions of this proceeding so there is a diverse span of experiences from the Deaf community about broadcasting accessibility issues as there are international examples of excellence in broadcasting for DDBHH which Canada is lacking in. This is the first time Deaf people can finally express what they wish to see in broadcasting in Canada. The team will develop interview questions that are taken from the proceeding participation questions to help us answer the intervention to participate in this proceeding.

8. Therefore, DWCC confirms it needs additional time to pull together a document for submission for this proceeding.

III. Integration of Public Opinion Research

9. DWCC echoes PIAC and FRPC's calls for the timely publication of any third-party public opinion research related to this proceeding.
10. Access to this data well before the extended deadlines is imperative for meaningful analysis and contribution.
11. The Committee's request that the CRTC disclose the complete research framework, methodology, and results, enabling all stakeholders to engage with the findings effectively.

IV. Alignment with Accessibility Goals

Whereas we see in the **Broadcasting Act**,

Interpretation

Definitions

2 (1) *In this Act,*

barrier has the same meaning as in section 2 of the Accessible Canada Act; (obstacle)

3 (1) It is hereby declared as the broadcasting policy for Canada that:

(p) programming that is accessible without barriers to persons with disabilities should be provided within the Canadian broadcasting system, including through community broadcasting, as well as the opportunity for them to develop their own content and voices;

(p.1) programming that is accessible without barriers to persons with disabilities should be provided within the Canadian broadcasting system, including without limitation, closed captioning services and described video services available to assist persons living with a visual or auditory impairment;

Accessible Canada Act

- A. In Section 5 (c) of the *Accessible Canada Act* prohibits barriers in mobile services as shown in:

Purpose

5 The purpose of this Act is to benefit all persons, especially persons with disabilities, through the realization, within the purview of matters coming within the legislative authority of Parliament, of a Canada without barriers, on or before January 1, 2040, particularly by the identification and removal of barriers, and the prevention of new

barriers, in the following areas: (c) information and communication technologies;

Section 5.2 of the same Act reads as follows:

Recognition of sign languages

(2) American Sign Language, Quebec Sign Language and Indigenous sign languages are recognized as the primary languages for communication by deaf persons in Canada.

12. This means that sign languages play a big part in ensuring the accessibility for deaf persons in Canada. DWCC fails to understand why CRTC did not consider accessibility as one of the focal points of this proceeding, and instead has it as an afterthought. The Commission must, for every proceeding, consider accessibility as inclusion, with no omission. In fact, it is the very reason why Deaf, Deaf-Blind and Hard of hearing have been left out since the AMI-TV was established in 1989, formerly the National Broadcasting Reading Service (NBRS).

13. Since April 20, 1964, the BBC has demonstrated its commitment to inclusivity by successfully establishing a Deaf broadcasting entity, including the launch of “See Hear” in 1981—a groundbreaking program created for Deaf and hard-of-hearing audiences. Presented in British Sign Language (BSL) with subtitles, this magazine-style show has provided vital representation and accessibility for the Deaf community for decades. In stark contrast, Canada has yet to develop a similar dedicated broadcasting platform for its Deaf population.

14. This glaring disparity highlights a systemic failure to ensure inclusivity and equitable access to media. As such, it underscores the need for robust engagement in the Commission’s proceedings to advocate for meaningful progress in this area.

15. The CRTC’s Strategic Plan highlights its commitment to being a modern, inclusive, and transparent regulator. Extending deadlines and ensuring accessibility aligns with these principles. DWCC underscores that without appropriate adjustments, consumer advocacy groups may struggle to contribute meaningfully, undermining the Commission’s goals.

V. Proposed Adjustments

16. DWCC recommends the following procedural adjustments for the benefit of all stakeholders:

- **Deadline Extensions:** Intervention deadline to February 20, 2025, and reply deadline to March 14, 2025.
- **Publication of Research:** Release of public opinion research findings by January 20, 2025, or earlier, ensuring sufficient review time.
- **Inclusive Communication:** Continued consultation with advocacy groups to ensure equitable processes and outcomes.

Conclusion

17. DWCC looks forward to its participation in this proceeding and ensuring that Deaf, Deaf-Blind and Hard of hearing Canadians' perspectives are included in this broadcasting consultation.

18. DWCC remains committed to supporting the inclusion of DDBHH Canadians in broadcasting accessibility as well as CRTC's efforts in achieving a fair and transparent consultation process. Should you require further information or wish to discuss this matter in detail, please do not hesitate to contact us at regulatory@deafwireless.ca.

Thank you for your attention to this matter.

Sincerely,

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cc:

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