



Deaf Wireless Canada Consultative Committee

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VIA EMAIL DISTRIBUTION and GC KEY

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Mr. Marc Morin

Secretary-General

Canadian Radio-telecommunications and Telecommunications Commission (CRTC)

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Reference: Public record: [1011-NOC2024-288](#)

Broadcasting Notice of Consultation CRTC 2024-288

Subject: The Path Forward – Defining “Canadian program” and supporting the creation and distribution of Canadian programming in the audio-visual sector

Final Reply of the Deaf Wireless Canada Consultative Committee (DWCC)

Centering Sign Language in Canadian Content Policy

- 1. DWCC reiterates** that American Sign Language (ASL) and langue des signes québécoise (LSQ), are not merely accessibility tools, but are cultural languages in their own right. They must be recognized and included as a foundational pillar of Canadian broadcasting policy.
- 2. DWCC urges** the Commission to adopt a comprehensive model that includes a TV and Digital Access code to ensure accessible broadcasting, the creation of a Canadian Sign Languages Broadcasting Fund (CSLBF) to support content in ASL and LSQ, and the establishment of a Sign Languages Commissioning Body. This body should be modelled after successful initiatives such as LumoTV and the UK's Ofcom's 5% signing requirement, providing dedicated and sustained support for sign language programming across Canada's broadcasting landscape.

Human Rights and Accessibility Law Framework: Legal Mandates to Act

3. Canada is legally bound to implement inclusive broadcasting policy under several key frameworks.
4. Article 30.4 of the UN Convention on the Rights of Persons with Disabilities affirms the cultural and linguistic identity of persons with disabilities, explicitly sign languages.
5. The Accessible Canada Act (ACA) mandates that regulated broadcasters develop and maintain accessibility plans in consultation with people with disabilities.
6. Additionally, the Broadcasting Act requires the Canadian broadcasting policy to reflect the diversity and accessibility needs of Canadian society.
7. Collectively, these obligations underscore the imperative for a broadcasting system that fully includes sign language users.

Cultural Sovereignty: Sign Languages as Canadian Identity

8. The definition of a 'Canadian program' must be modernized to reflect the contributions of Deaf, DeafBlind, and Hard of Hearing (DDBHH) creators as cultural producers, not merely as beneficiaries of access.
9. Sign language-authored works must be acknowledged as valid intellectual property within Canadian content certification criteria.
10. Furthermore, authentic representation must be prioritized, ensuring the stories are told by DDBHH individuals, in their natural language, to truly reflect the richness and diversity of Canadian society.

Lack of Sign Language-centric Broadcasting framework

11. **DWCC reminds** the Commission to reflect on the very term used in this proceeding: *audio-visual sector*. While commonly used in regulatory and industry discourse, it inherently centres around the auditory experience and reinforces a hearing-centric worldview.
12. At present, Canada's broadcasting system remains predominantly hearing-centric, resulting in the absence of a sign languages-centric framework.
13. Current broadcasting regulations fail to adequately address the accessibility needs of DDBHH Canadians. This regulatory gap not only limits access but also excludes sign

language users from cultural representation, content creation, and meaningful participation in Canada's media landscape.

14. This structural gap excludes DDBHH communities from full participation as cultural producers and audiences and reinforces systemic barriers to linguistic and cultural equity in broadcasting policy.
15. The absence of sign language programming combined with persistent rejection of DDBHH creators including talented artists like Alvin Witcher, Alice Dulude, and David Rosenbaum reflects systemic barriers embedded in outdated certification rules.
16. **DWCC submits** that the current definition of "Canadian Program" under CRTC policy frameworks must be modernized to recognize sign language-authored works and DDBHH cultural production.

Feasibility Study: Precedent and Urgency

17. **DWCC requests** that the Commission initiate a feasibility study on the development of a Sign Language Broadcasting System, modelled on the precedent set in CRTC 2009-430 for Video Relay Services (VRS) development.
18. This study should explore and map out sustainable funding models, establish clear pathways for sign language content distribution across traditional and digital platforms, and be conducted in full consultation with DDBHH-led organizations to ensure the system is community-informed, culturally grounded, and aligned with accessibility and inclusion mandates.

Regulatory Alignment: Collaboration Across Equity Mandates

19. **DWCC's proposals** are strongly aligned with key stakeholder positions across the broadcasting and cultural sectors.
20. The Public Interest Advocacy Centre (PIAC) affirms that accessibility is not a 'soft' consideration but a fundamental requirement.
21. The Canadian Independent Screen Fund for BPOC Creators (CISF) and Black Screen Office (BSO) advocate for cultural equity and identity-based metrics, principles that equally apply to DDBHH communities.
22. The Canada Media Fund (CMF) recognizes the urgent need for reinvestment in underserved content, including programming in sign languages.

Recommendations

23. DWCC urges the Commission to embed the Accessibility Lens at every level of the broadcasting regulatory framework. Applying the Accessibility Lens comprehensively will ensure that content created in ASL and LSQ is recognized as Canadian programming, that DDBHH creators are equitably supported, and that accessibility is treated as an essential component of cultural policy, not an afterthought.

24. DWCC calls on the Commission to implement a comprehensive strategy to embed sign language inclusion in Canada's broadcasting system for BNC CRTC 2024-288.

25. The following key actions are recommended:

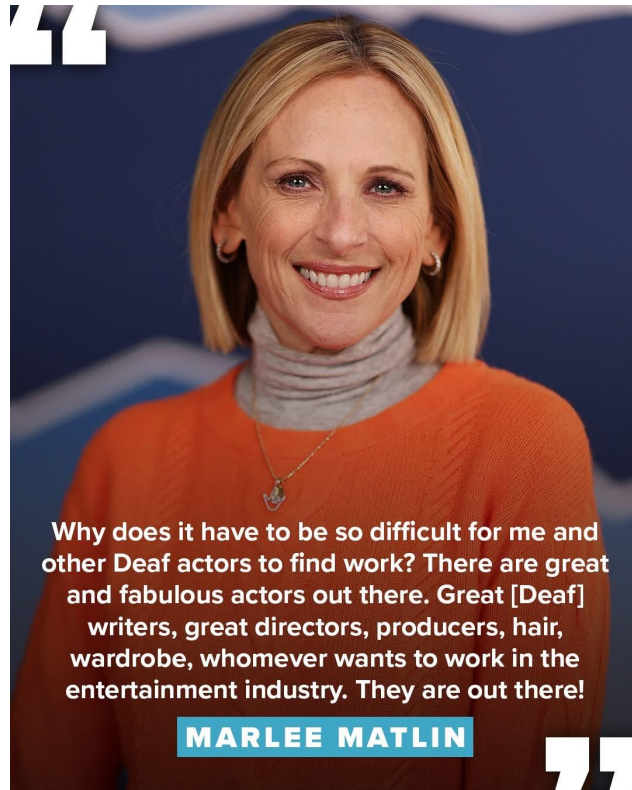
- a. Set and regulate a TV & Digital Access Code for Broadcasting, including:
 - i. A minimum of 5% quota of Canadian content in ASL and LSQ
 - ii. Discovery, indexing, and accessibility standards for sign language content across platforms
- b. Create a Sign Languages Commissioning body, modelled after LumoTV, to:
 - i. Commission DDBHH-led projects across platforms
 - ii. Upload language and content standards
 - iii. Empower DDBHH leadership in decision-making and cultural production
- c. Establish a Canadian Sign Languages Broadcasting Fund with DDBHH-led governance to:
 - i. Support original programming in ASL and LSQ
 - ii. Address the longstanding systemic underfunding of signing communities in Canadian media
- d. Initiate and carry out a CRTC feasibility study, modelled on the 2009-430 precedent to:
 - i. Map sustainable funding models and content development pathways
 - ii. Consult meaningfully with DDBHH-led organizations

26. DWCC's recommendations are intended to ensure that sign language users are equitably included in Canada's evolving broadcasting framework.

Final Reflections

27. Commissioners, accessibility is a right, and representation is equity. **DWCC urges** the Commission to move beyond symbolic inclusion and establish lasting infrastructure that recognizes DBHH Canadians as cultural leaders and full participants.

28. Here is a [quote from Marlee Matlin](#) - *“Why does it have to be so difficult for me and other Deaf actors to find work? There are great and fabulous actors out there. Great [Deaf] writers, great directors, producers, hair, wardrobe, whomever wants to work in the entertainment industry. They are out there!”* - Parade Magazine, June 18, 2025



JUN 18, 2025

29. *“We’re not asking for accommodation. We’re asking for recognition.”*
– DWCC CRTIC Hearing, May 15, 2025

Addendum: Expanded Final Replies

Response to Presentations in CRTC Hearing on The Path Forward-Defining “Canadian program” and supporting the creation and distribution of Canadian programming in the audio-visual sector.

A. Accessibility and Linguistic Inclusion

- 30.** The **Accessibility Lens** is a policy tool that evaluates all regulatory frameworks, such as funding, certification, and programming, through the lived experience of DDBHH individuals to proactively identify and remove systemic barriers. Applying this lens ensures authentic inclusion and meaningful access across Canada’s broadcasting ecosystem.
- 31.** **DWCC** emphasizes that an Accessibility Lens must be integrated into all certification, policy, and funding frameworks from the outset. Sign languages must be embedded as foundational elements, not retrofitted as afterthoughts. This approach ensures authentic inclusion and meaningful access for DDBHH communities throughout the broadcasting ecosystem.
- 32.** **DWCC** notes with concern that no participants during the BNC 2024-288 directly referenced ASL or LSQ. This absence highlights the ongoing invisibility of sign language communities in broadcasting policy and constitutes a major oversight.
- 33.** Moreover, accessibility was mentioned briefly; for example, Reelworld’s reference to racial equity without substantive discussion of sign languages or the accessibility needs of DDBHH communities. This gap reflects the continued marginalization of DDBHH accessibility concerns in broader equity conversations.
- 34.** **DWCC** reiterates the need for concrete structural responses, including a TV & Digital Access Code, a Canadian Sign Languages Broadcasting Fund (CSLBF), and a sign language-based commissioning body to ensure authentic inclusion going forward.
- 35.** The CRTC would oversee the CSLBF, appointed by DDBHH communities in partnership with DWCC. The fund’s board structure, modelled on the British Broadcasting Trust (BSLBT), and its contribution mechanisms and disbursement models would be determined via a feasibility study.
- 36.** **DWCC’s** recommended Contribution Mechanisms include:
- a. Regulatory Benefits from Ownership Transactions
 - b. Equity-Based Contributions Framework under CRTC Oversight
 - c. Public Funding or Parliamentary Appropriation via Canadian Heritage
 - d. Mandatory Contributions from Licensed Broadcasters and BDUs
 - e. Mandated Contributions from Broadcasting and Streaming Services

- 37.** While **DWCC** acknowledges DHH Coalition’s support for sign language programming when CanCon criteria are met, it stresses the need for equity-based eligibility, not a mere reduction to technical checklists to guarantee meaningful inclusion of DDBHH creators.
- 38.** AMI focuses on disability programming, but is not sign-language-centric. **DWCC** acknowledges AMI’s approach but emphasizes the distinction between general disability representation and sign language-centred cultural production.
- 39.** DSO called for the structural inclusion of disabled creators in funding, certification, and leadership decisions. **DWCC** fully supports this and proposes a permanent Accessibility Advisory Committee at the CRTC. However, it emphasizes that sign languages are cultural assets, not assistive tools.
- 40.** PIAC fully supports **DWCC’s** concern that the system has failed to prioritize accessibility, Deaf representation, and equitable contribution from foreign digital giants. It also warns against excluding accessibility and diversity under a narrow definition of “Canadian.”
- 41.** **DWCC** echoes PIAC’s warning, insisting that accessibility must not be seen as “soft” or secondary consideration but as a fundamental requirement for democratic inclusion and cultural equity in broadcasting policy.
- 42.** PIAC’s framing of the Broadcasting Act as a tool of cultural and industrial policy lines up with DWCC’s demand for DDBHH-centered production mandates. **DWCC** in turn aligns with this perspective, supporting mandates centered on DDBHH communities.
- 43.** Accordingly, **DWCC** calls for the establishment of a permanent Accessibility Lens advisory group within the CRTC, inclusive of DDBHH stakeholders, to ensure ongoing, meaningful participation in regulatory development.
- 44.** The CBC/Radio-Canada, as Canada’s national public broadcaster, holds a unique responsibility under the Broadcasting Act to reflect the diversity and accessibility of Canadian society. Yet CBC/Radio-Canada has yet to meaningfully include ASL and LSQ programming across its television and digital platforms. Despite its mandate to serve all Canadians, DDBHH audiences remain underserved in news, children’s programming, and cultural content.
- 45.** **DWCC** urges the Commission to require CBC/Radio-Canada to implement sign language inclusive programming strategies, including allocating a portion of its public funding to DDBHH-led productions and ensuring ASL and LSQ content across its services. As a public institution, CBC/Radio-Canada must lead by example and fulfill its legislative obligation to support accessible, equitable, and inclusive broadcasting.

- 46. Ultimately, sign language media is not simply an accessibility add-on or disability portrayal; it is a distinct linguistic and cultural expression requiring dedicated funding, policy frameworks, and creative leadership from DDBHH communities.**

B. Canadian Content and Intellectual Property Ownership

- 47.** AQPM maintains a strong position on requiring Canadian-controlled IP ownership, specifically 100% for independent producers and rejects foreign service productions being counted as CanCon. It emphasizes that cultural sovereignty and creative autonomy must remain in Canadian hands to ensure authentic Canadian stories are developed, owned, and shared by Canadians.
- 48. DWCC** endorses AQPM's push for IP ownership tied to actual Canadian creative leadership. Canadian content also must meet accessibility standards by including accessible formats and content in ASL and LSQ. Moreover, IP ownership must be retained by equity-seeking and DDBHH creators to ensure meaningful participation, cultural sovereignty, and economic equity.
- 49. DWCC** pushes for the inclusion of sign-language-authored and-led productions as a certification track. Canadian programming must reflect authentic lived experiences of DDBHH people in their own languages, not filtered through hearing narratives disconnected from those communities.
- 50.** AQPM and Reelworld echo these concerns, emphasizing strong positions on cultural sovereignty, linguistic identity, and authentic narrative control. Their alignment underscores the broader industry need for systemic change led by those with lived and linguistic experience.
- 51.** NFB advocates for cultural tests that reflect authenticity and regional diversity. **DWCC** strongly recommends that the definition of Canadian programming explicitly include the intersectional lived experiences of DDBHH communities, with particular attention to sign language users and DDBHH creators, to ensure equitable recognition and representation.
- 52. DWCC** strongly agrees with CAFDE's position on Canadian IP ownership as a safeguard and emphasizes that this must apply equally to DDBHH-owned content, including vlogs, and sign language documentaries. **DWCC** also champions early-stage financing as a critical mechanism to support DDBHH-led productions in ASL and LSQ.
- 53.** CMPA highlighted the importance of IP control and monetization for creators. **DWCC** agrees and affirms that this principle must be extended to DDBHH-authored cultural

products such as vlogs, theatre, and visual poetry. These works must be recognized as monetizable IP for CanCon purposes.

- 54. DOC, Blue Ant, DGC, and Unifor advocated for clear Canadian ownership in an age of global streaming rights. **DWCC** supports these calls and adds that DDBHH-led IP ownership is essential to resist streaming platforms' phantom rights over sign language content.
- 55. CMF proposed a project-centric, adaptable CanCon model with built-in equity measures. **DWCC** agrees with this framework but demands that ASL and LSQ roles be explicitly named to ensure accessibility is embedded, not an afterthought.
- 56. DOC and Unifor defended POV documentaries and long-form cultural storytelling as Programs of National Interest (PNI). **DWCC** strongly agrees and underscores that DDBHH-authored productions must retain creative control. Any flexibility must include accountability to safeguard sign language authorship.
- 57. In sum, ownership, authorship, and narrative control are not abstract values. They are the foundation for a broadcasting system that recognizes DDBHH creators as full participants in Canadian cultural life.

C. Equity-Based Spending and Investment Requirements

- 58. CAB calls for deregulation, flexible contribution targets, and minimal spending requirements and opposes prescriptive models like PNI. **DWCC** strongly rejects this "choose-your-own-adventure" flexibility. A deregulated, voluntary approach has consistently failed to deliver equitable outcomes for DDBHH communities. Without binding obligations tied to accessibility, sign language inclusion and DDBHH leadership, systemic exclusion will persist. Flexibility without accountability is not equity - it is avoidance.
- 59. In contrast, **DWCC** supports AQPM, TFO, and Reelworld's calls for strong spending requirements, particularly for underserved groups. These requirements must explicitly name DDBHH communities, whose cultural and linguistic contributions have been systematically excluded. Regulatory models must enshrine DDBHH creators and sign language content as funding priorities.
- 60. Reelworld recommended that 30% of CPE be allocated to racialized creators and proposed paid advisory boards. **DWCC** affirms that DDBHH creators must be explicitly included within these targeted CPE allocations. Any equity-based spending model that omits mention of DDBHH-led productions, including original content in ASL and LSQ, risks continuing a legacy of erasure.

- 61.** BSO and CISF similarly called for equity-based fund carve-outs and bonus points for underrepresented creators. **DWCC** supports this initiative and underscores the importance of explicitly including DDBHH creators and sign language productions. Accordingly, DWCC recommends a minimum allocation of 30% dedicated to accessibility measures and content in ASL and LSQ.
- 62.** Reelworld advocates for an expanded CanCon definition that gives points for Canadian locations, visible Canadian elements, and Canadian writers, especially from racialized backgrounds. **DWCC** supports this approach and stresses that sign language-authored content and DDBHH creators must also be explicitly included in any expanded CanCon definition to ensure true cultural and linguistic diversity.
- 63.** Corus defended the principle of equity between traditional broadcasters and streamers, pushing back on lower standards for international undertakings. **DWCC** reinforces the need for equity in accessibility obligations. Streamers must be held to the same standards as broadcasters in providing closed captioning, sign language, and accessible content discovery tools.
- 64.** **DWCC** asserts that equity-based funding must move beyond abstract principles toward measurable, binding investment in historically marginalized creators, including those in DDBHH communities. Without this, the promise of Canadian broadcasting inclusivity remains unfulfilled.

D. Children's and Youth Programming

- 65.** Shaw Rocket Fund has proposed allocating 20% of CPE to children's programming and expressed openness to distributing those funds through existing or new mechanisms. **DWCC** supports this proposal and stresses that sign language inclusive children's content must be a required component of any such fund. Ensuring accessible media for DDBHH youth is vital to preserving cultural identity and promoting equitable cultural participation from an early age.
- 66.** Youth Media Alliance (YMA), Epic Story Media, and Huminah Huminah Animation emphasized that children's content is in crisis. With viewership rapidly migrating to digital platforms, they argue that without explicit regulatory obligations, kids' programming will collapse. Their recommendations include:
- a. A mandatory 15–20% CPE allocation to youth content from streamers;
 - b. A requirement that media companies producing children's programming must contribute to a dedicated fund (e.g. Shaw Rocket Fund)
 - c. A strong commitment to preserving national identity through accessible and diverse programming.
- 67.** **DWCC** adopts and reinforces this "youth programming at risk" framing presented and further emphasizes the urgent need for sign language inclusive children's

programming. DDBHH youth deserve to see their language and culture reflected in media. Without explicit regulatory obligations, sign language content risks being excluded from both traditional and emerging platforms, undermining DDBHH cultural development and visibility at a formative age.

- 68.** 9 Story, CMF, and CBC have raised the alarm over the dramatic decline in youth programming investment from a historic 22% target to just 8%. **DWCC** shares this concern and calls for direct investment in children's content specifically designed for DDBHH audiences. DWCC supports CMF's flexible, equity-based CanCon model but insists that ASL and LSQ carve-outs must be explicitly named. This is essential to foster early cultural connection and ensure that youth programming truly reflects Canada's full linguistic and cultural diversity.

E. Showrunner Development and Creative Leadership

- 69.** **DWCC** emphasizes the critical importance of developing DDBHH-led showrunners and fostering meaningful partnerships with broadcasters. An accessibility Lens must be applied from the outset to ensure that accessibility is embedded throughout the production chain, not retrofitted as an afterthought. This foundational approach is essential to build authentic, sustainable pipelines for DDBHH creative leadership.
- 70.** CFI, NSI, and L'inis have called for the inclusion of showrunners in the CanCon point system for greater investments in the training pipelines. **DWCC** supports this inclusion only when paired with robust equity mandates. **DWCC** highlights the need for funded training programs that create dedicated pathways for DDBHH showrunners and original content in ASL and LSQ. Accordingly, **DWCC** recommends the development of DDBHH-led or ASL/LSQ-literate showrunner pathways, particularly within commissioning and feasibility models such as LumoTV.
- 71.** TCAQ proposed that community media access to funding and BDU should be required to support local content. **DWCC** supports this proposal and insists that ASL and LSQ-accessible community media be explicitly named as beneficiaries. Such inclusion must be reflected in any future community programming funds or regulatory frameworks to ensure equitable participation by DDBHH creators and audiences.

F. Data, Accountability, and Systemic Reform

- 72.** FRCP supports data collection and inclusion of equity-seeking groups in CRTC processes. **DWCC** endorses FRPC's call for stronger accountability and adds that DDBHH-led data initiatives must be formally recognized and integrated into regulatory development.
- 73.** OLMC requested clear producer definitions and data tracking for OLMC content. **DWCC** aligns with this recommendation and proposes OLMC's 51% ownership

model be adopted for DDBHH accessibility-led production companies to ensure equity in certification and funding eligibility.

- 74.** OLMC and DSO requested identity-based data tracking for production and funding. **DWCC** supports this approach and calls for the creation of a distinct system to track DDBHH creators and sign language accessible programming. Without such mechanisms, DDBHH contributions will remain invisible in data-driven regulatory decision-making.
- 75.** Rogers opposed the expansion of accessibility-related funding and called for greater financial flexibility. **DWCC** challenges this position. If Rogers resists the creation of new funds, it must demonstrate measurable inclusion of DDBHH content and provide concrete evidence of how accessibility is currently being achieved under existing regulatory obligations.
- 76.** Bell Media requested flexibility for Canadian content certification while maintaining a stated commitment to accessibility. **DWCC** asserts that if regulatory flexibility is granted, it must be tied to transparent reporting on ASL and LSQ inclusion. Bell's claim of exceeding accessibility standards must be substantiated with clear, measurable outcomes to ensure accountability and credibility.

G. Artificial Intelligence and Ethical Safeguards

- 77.** ACTRA warned against AI replacing performers, proposed a performer development fund, and advocated for protections against deepfake misuse. **DWCC** fully agrees and reinforces that ASL and LSQ content remain human-led. Additionally, DWCC's safe AI in sign language initiative aligns with ACTRA's moral rights framework, emphasizing the need for cultural and creative integrity.
- 78.** ACTRA, CBC, and DSO expressed concerns about AI displacing creators and the ethical misuse of likeness through deepfakes. **DWCC** echoes these concerns and stresses that AI-generated sign language must never replace human signers. To safeguard linguistic and cultural authenticity, DWCC supports the implementation of formal guardrails for ethical AI use in ASL and LSQ content.

H. News and Public Service Programming

- 79.** Corus advocated for flexible funding support for news as a public service. **DWCC** agrees with the principle of flexibility but emphasizes that ASL and LSQ news programming must receive equivalent, dedicated support. To ensure sustainable delivery, **DWCC** proposes a light-touch regulatory approach combined with targeted incentives that prioritize sign language news content as a public good.

I. Principles and Frameworks for DDBHH Inclusive Broadcasting Policy

- 80.** The Commission must **adopt an Accessibility Lens across all areas of broadcasting policy**. This includes explicit alignment with the ACA, Canada's obligations under the UN CRPD, the Supreme Court's Eldridge decision, and relevant Articles of the ACA. The duty to accommodate is not optional. It must be embedded in certification, funding, and regulatory frameworks.
- 81. ASL and LSQ must be explicitly integrated into the definition of Canadian content.** The definition must be modernized to move beyond hearing-centric frameworks and recognize sign languages as central to Canada's linguistic and cultural identity. This is essential to reflect the full diversity of Canadian creators and audiences.
- 82.** The Commission must actively **promote DDBHH leadership in content creation**, moving beyond mere representation to ensure authentic creative control. An Accessibility Lens should be embedded across all aspects of policy design, funding decisions, production processes, and certification criteria to guarantee meaningful inclusion.
- 83. DWCC** reiterates that the term "audiovisual" is hearing-centric and exclusionary and calls for a reframing of terminology and structural frameworks to explicitly center sign language users as vital contributors within Canada's media landscape.

J. DWCC's Structural and Policy Recommendations

1. Set and Regulate a TV & Digital Access Code

- 84. DWCC** reiterates its recommendation that the Commission set and regulate a TV & Digital Media Access Code, modelled after the UK's Ofcom standards (Ofcom's Code on Television Access Services in 2004). This Code must mandate that at least 5% of all Canadian content includes ASL and LSQ with enforceable accessibility and quality standards. This will ensure the systemic inclusion of DDBHH Canadians in both the creation and enjoyment of Canadian content.

2. Create a Sign Language-based Commissioning Body

- 85. DWCC** recommends the Commission to create a dedicated sign language-based commissioning body, modelled after LumoTV. This initiative will ensure DDBHH leadership directs content creation, commissioning, and funding to authentically represent and serve these communities.

3. Establish a Canadian Sign Languages Broadcasting Fund

- 86. DWCC** recommends the Commission to establish a Canadian Sign Languages Broadcasting Fund, governed by DDBHH creators built on an equity-based model. This fund would support the production of original sign language content across multiple platforms, ensuring both authentic representation and accessibility.

4. Initiate and carry out a Feasibility Study on Sign Language Broadcasting

- 87. DWCC** urges the Commission to initiate and carry out a feasibility study on sign language-based broadcasting, drawing on the direct precedent of CRTC Decision 2009-430 for Video Relay Services (VRS). This study should explore a dedicated broadcasting model tailored to the needs of DDBHH communities in Canada.

Conclusion

- 88. DWCC** thanks the Commission for the opportunity to participate in this proceeding.

Respectfully submitted,

Jeffrey Beatty
Chairperson,
Deaf Wireless Canada Consultative Committee (DWCC)
Date: June 23, 2025

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