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VIA EMAIL DISTRIBUTION and GC KEY

February 24, 2025

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

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

Reference: Public record: [1011-NOC2024-0288](#)

Re: Intervention to participate in BNC CRTC 2024-288

Dear Secretary General,

1. The Deaf Wireless Canada Consultative Committee - Comité pour les Services Sans fil des Sourds du Canada (DWCC - CSSSC or "**DWCC**") hereby submits this updated intervention to participate in the proceeding BNC CRTC 2024-288, ***The Path Forward – Defining "Canadian program" and supporting the creation and distribution of Canadian programming in the audio-visual sector***. This update integrates findings from our Interviews Report for 2024-288, which provides direct insights from the Deaf, Deaf-Blind, and Hard-of-Hearing (DDBHH) communities regarding Canadian programming accessibility.
2. This intervention expands on our previous submission (January 27, 2025) and provides additional evidence emphasizing the need for policy reform, incentives for Deaf talent, and structural changes within the regulatory framework to ensure that sign language accessibility is fully integrated into Canadian broadcasting.

3. This proceeding, which seeks to modernize the definition of “Canadian program” and address critical issues in Canadian programming, presents a unique opportunity to incorporate accessibility as a core criterion. **DWCC** appreciates the opportunity to participate in this proceeding. **DWCC** recognizes the significance of this consultation in ensuring equitable and inclusive policies for the diverse communities served by Canadian broadcasting, including the Deaf, Deaf-Blind, and Hard of Hearing (DDBHH) communities.

About our Committee

4. **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 DDBHH, it is inclusive of all those with intersectional identities.
5. **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.

Key Findings from the Interviews Report (2024-288)

6. Lack of Sign Language Representation in Media
 - a. ASL and LSQ are often excluded from mainstream broadcasts, preventing Deaf communities from accessing vital content
 - b. Limited Deaf representation in key production roles such as directors, writers, and showrunners results in an absence of authentic storytelling

7. Inaccessibility of Urgent News and Health Information
 - a. Emergency news, public safety announcements, and health updates frequently exclude ASL and LSQ interpretation
 - b. Deaf audiences are often left without critical information during national emergencies
8. Absence of Dedicated Deaf TV and Streaming Platforms
 - a. There is no designated ASL or LSQ broadcasting platform similar to the British Sign Language Broadcasting Trust (BSLBT) model in the UK.
 - b. Funding is required to support Deaf-centric media initiatives.
9. Limited Professional Opportunities for Deaf Talent
 - a. Few incentives exist to encourage the hiring and training of Deaf professionals in media production.
 - b. Accessibility consultants with lived Deaf experiences should be integrated into production teams.

DWCC's Updated Recommendations

10. Mandate ASL and LSQ Inclusion in the Definition of "Canadian Program"
 - a. The CRTC must modernize its framework to require that productions receiving Canadian certification integrate sign language accessibility at all stages of production.
 - b. Productions should include Deaf signing actors, directors, and accessibility consultants to ensure authentic representation.
11. Establish an Incentive-Based System for Hiring Deaf Professionals
 - a. Productions should receive additional Cancon certification points for hiring Deaf professionals in key creative roles.
 - b. These roles include showrunners, writers, directors, accessibility consultants, and signing interpreters for both ASL and LSQ.
12. Develop Compliance Mechanisms for Accessibility Standards
 - a. A compliance system must be implemented to ensure taxpayer-funded productions meet accessibility standards.
 - b. This should include penalties for non-compliance and funding incentives for productions meeting high accessibility benchmarks.
13. Fund a Feasibility Study for a Deaf TV Broadcasting and Streaming Channel
 - a. The CRTC should allocate funding to explore the creation of a national Deaf broadcasting platform in ASL and LSQ.
 - b. The model should be based on BSLBT (British Sign Language Broadcasting Trust), which commissions sign language-based content.

Participation in the Proceeding

14. **DWCC** respectfully requests the opportunity to present these findings and recommendations at the public hearing in Gatineau, Quebec. We request ASL and LSQ interpretation and CART services to ensure full accessibility for our panellists.
15. **DWCC** appreciates the Commission's commitment to accessibility and the inclusion of the DDBHH community in this critical consultation process. We look forward to contributing our insights and participating in the reply phase.
16. **DWCC** appreciates the Commission's consideration of its supplementary Interventions. Should you have any questions, please do not hesitate to contact all of us.

Best regards,

Jeff Beatty
Chairperson
Deaf Wireless Canada Consultative Committee (DWCC)