

FINAL V 4.0 - 2024-288 CRTC Hearing Presentation Planning - May 15th 9 AM

1. Opening Remarks

Commissioners, we thank you for the opportunity to appear before you and contribute meaningfully to the Broadcasting Notice of Consultation CRTC 2024-288 proceeding. We welcome the chance to participate in this essential broadcasting proceeding and share our perspective on its implications and opportunities for Canada's broadcasting future that includes Canada's sign languages and DDBHH communities.

2. Defining "Canadian Program"

Modernization with an Accessibility Lens

When defining what qualifies as a "Canadian Program", the Commission must apply an Accessibility Lens that reflects Canada's linguistic and cultural diversity, including the lived experiences of DDBHH communities. Sign languages are the natural languages of Deaf Canadians.

It is crucial that the Commission demonstrate leadership by upholding the UN Convention on the Rights of Persons with Disabilities by recognizing and supporting the use of sign languages across its platforms. Additionally, since the UN observes and recognizes the UN International Day of Sign Languages annually on September 23rd, the Commission should follow suit.

According to the Accessible Canada Act, American Sign Language (ASL), Langue des signes québécoise (LSQ), and Indigenous sign languages (ISLs) are recognized as the primary languages of Deaf people in Canada. This recognition highlights the need to increase the availability of signed content across all broadcasting and digital platforms. Such action affirms these sign languages as integral components to Canada's linguistic and cultural heritage and the federal government's commitment to accessibility and inclusion.

CRTC Policy Direction 2023

The CRTC's 2023 Policy Direction has had a meaningful impact on how policies and regulations are shaped in both telecommunications and broadcasting. Its emphasis on accessibility, equity, and consumer rights has strengthened the Commission's role in removing systemic barriers. This is critical for ensuring that DDBHH Canadians are fully included in the digital economy and broadcasting landscape, not as an afterthought, but as equal participants.

Authentic DDBHH Creative Leadership

To achieve true equality in Canada's broadcasting system, the Commission must prioritize authentic leadership by DDBHH individuals. This means not only representation on screen, but DDBHH creators leading content development, direction, and production. Structural support through sustainable funding, mentorship, leadership development, and access to decision making-roles is essential.

Authentic leadership ensures that stories are told in ASL, LSQ, and ISLs, grounded in the lived experiences. It also upholds the right language access from birth, fostering early communication and cultural identity, and ensuring full civic and cultural participation in society. When DDBHH communities lead, they shape narratives that are both authentic and empowering, and vital to a truly inclusive and diverse broadcasting system.

3. Structural Exclusion

Hearing-centric Broadcasting System

DWCC urges 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. This has led to a lack of sign-language centric broadcasting framework in Canada.

This framing marginalizes the cultural contributions and creative leadership of DDBHH Canadians. As a result, current media structures often fail to provide equitable opportunities for DDBHH creators or fully accessible experiences for DDBHH audiences. The persistent absence of sign language in Canadian content continues to deny these communities full and equal access.

Modern Definition

As the Commission moves to modernize its definition of Canadian content, it is essential to move beyond outdated hearing-centric frameworks. Modern media policy must reflect the full range of how Canadians access and engage with content, including those who use sign languages. True modernization requires inclusive language and frameworks that recognize these diverse moderns of communication as equally valid.

Canada's broadcasting system must represent the full spectrum of its cultural and linguistic diversity. This means including sign languages as equal contributors to cultural expression and accessibility. The Commission has an opportunity to ensure its policies validate and reflect this diversity in a meaningful and inclusive way.

Ofcom

In the United Kingdom, Ofcom's TV Access Services Code mandates that broadcasters make a proportion of their programming accessible, including sign languages. Major broadcasters with larger audiences are required to meet specific quotas directly with smaller broadcasters fulfilling their obligations through alternative signing requirements. This code equitably supports sign languages, accessibility, and cultural production. Canada currently lacks a comparable mechanism.

Recommendation

DWCC recommends the Commission to set and regulate a new TV and Digital Access Code that sets clear and enforceable rules for broadcasters, online streaming service providers, and

wireless service providers on making a certain amount of their programmes accessible. This Code should require 5% of Canadian content to be made accessible through high-quality ASL, LSQ, and ISLs in original production.

4. Sign Language Broadcasting System

LumoTV, British Sign Language Broadcasting Trust

LumoTV, formerly known as the British Sign Language Broadcasting Trust, has been a pioneering force in inclusive media since its establishment in 2008. As the world's only sign language-based commissioning body, LumoTV has transformed the UK's media landscape by funding and showcasing content created by and for Deaf communities. It provides commercial broadcasters with an alternative, accessible model of programming grounded in sign language, cultural authenticity, and Deaf-led storytelling. LumoTV demonstrates how Deaf-led programming can enrich national identity and expand inclusive storytelling, while maintaining high production values and audience reach.

Canada now has a unique opportunity to follow this global precedent by becoming the second country in the world to establish a dedicated sign language-based commissioning body. A Canadian equivalent would support the creation of original content in ASL, LSQ, and ISLs, while amplifying the voices of DDBHH communities.

Recommendation

DWCC respectfully recommends the Commission to create a sign language-based commissioning body in Canada, making it the second of its kind in the world. This body would be tasked with overseeing the Canadian Sign Languages Broadcasting Fund, dedicated to supporting the development, production, and distribution of sign language content across broadcast and digital platforms. By creating this body, Canada can foster a media landscape that authentically reflects the DDBHH communities and reflect the richness of Canada's linguistic and cultural diversity. It also would position Canada as a global leader in accessible and equitable media.

Canadian Sign Languages Broadcasting Fund (CSLBF)

DWCC recommends the Commission to establish a Canadian Sign Languages Broadcasting Fund. This is to be a dedicated fund that ensures the sustained and meaningful inclusion of DDBHH communities within Canada's broadcasting, online streaming, and internet ecosystems. This fund should specifically support the development, production, and distribution of content in ASL, LSQ, and ISLs, with governance and project leadership by DDBHH creators and organizations.

As an equity-based model, the fund would address long-standing systemic barriers to access and leadership, ensuring that sign language content is not merely accessible, but recognized as central to Canada's cultural expression. Such an investment is critical not only for dismantling systemic exclusion but also for affirming sign languages as vibrant, living parts of Canada's cultural fabric.

5. Feasibility Study

CRTC Feasibility Study Precedent

Broadcasting and Telecom Regulatory Policy CRTC 2009-430 set a key precedent by launching a feasibility study that led to Canada's Video Relay Service. This shows how the CRTC can act decisively to address accessibility gaps through structured policy development. DWCC highlights this precedent to support a similar approach for Broadcasting Notice CRTC 2024-288.

Recommendation

DWCC recommends the CRTC to initiate and carry out a feasibility study on a Sign Language-based Broadcasting System in Canada. The study would assess how to build a sign language-centric framework that supports ASL, LSQ, and Indigenous Sign Languages led by DDBHH communities within Canada's broadcasting and streaming sectors.

6. Closing/Call to Action

Commissioners, we are at a pivotal moment to reshape Canadian content policy into a system that is truly inclusive, representative, and equitable. For too long, DDBHH communities have been excluded, both as audiences and creators. This systemic exclusion must end.

Canada has an opportunity to lead globally by embedding accessibility, linguistic recognition, and DDBHH leadership into the core of how we define and fund Canadian content.

Let's build a broadcasting system where all voices, signed and spoken, can thrive. This begins with full sign language accessibility and DDBHH leadership. Our overall recommendations are:

- 1) To set and regulate a CRTC TV & Digital Access Code
- 2) To create a Sign Language-based Commissioning body in Canada
- 3) To establish a Canadian Sign Languages Broadcasting Fund (CSLBF)
- 4) To initiate and carry out a Feasibility Study on a Sign Language-based Broadcasting System in Canada