



Deaf Wireless Canada Consultative Committee

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VIA EMAIL DISTRIBUTION and GC KEY

June 12, 2025

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

File: 1011-NOC2024-0288

RE: DWCC Response to CRTC Questions – Broadcasting Notice of Consultation CRTC 2024-288

Dear Mr. Morin,

On behalf of the Deaf Wireless Canada Consultative Committee (DWCC), we are pleased to submit our combined response to two follow-up questions posed in the context of Broadcasting Notice of Consultation CRTC 2024-288. We appreciate the Commission's continued engagement with accessibility and inclusivity as core pillars in the modernization of Canadian broadcasting policy.

Response to Question Q49 – Pilot Projects in the Definition of Canadian Program

DWCC recommends that the Commission **eliminate pilot projects from the definition of a Canadian program** unless they are bound by clearly defined accessibility requirements and long-term equity objectives. Pilot projects, as temporary exemptions or experimental undertakings, often lack continuity, accountability, and sustainability for underrepresented communities, including the Deaf, DeafBlind, and Hard of Hearing (DDBHH) population.

In the absence of enforceable frameworks, pilot projects may inadvertently delay systemic change by operating outside the scope of standard broadcasting obligations. This is particularly concerning for sign language content creators, who require stable funding and consistent inclusion under Canada's broadcasting framework.

DWCC emphasizes that innovation must not come at the cost of accountability. Accessibility and linguistic equity—especially for ASL and LSQ users—must be integrated into all content from the outset, not retrofitted as part of a "trial." The Commission should therefore ensure that any remaining pilot designation be strictly time-limited, tied to mandatory accessibility standards, and subject to public reporting.

While DWCC recommends eliminating pilot programs as a pathway to qualify content as Canadian programming, we continue to support well-defined **feasibility studies** and **evidence-based planning** initiatives, such as the **LumoTV Accessibility Broadcasting Model**. These are not temporary experiments but strategic evaluations that inform long-term, inclusive broadcasting systems. The LumoTV model, inspired by the UK's Ofcom-supported BSLBT framework, represents the kind of structural, accessible investment Canada needs—one grounded in equity, governance, and cultural sustainability, not an exemption.

Response to Question Q40 – AI-Generated Material as Canadian Content

DWCC recommends that **AI-generated material should not automatically qualify as Canadian content** unless it is demonstrably authored, supervised, and curated by Canadian individuals or entities, and reflects Canadian cultural and linguistic identity.

In the context of Deaf content production, there is a growing concern about AI systems simulating or misrepresenting sign language content. AI avatars or translations generated without Deaf involvement risk perpetuating inaccuracies, linguistic harm, and cultural erasure.

However, DWCC acknowledges that AI can play a supportive role in **post-production accessibility tools** (e.g., captioning, metadata tagging, translation prompts), provided that such tools are validated and corrected by Deaf human experts.

To preserve the integrity of Canadian content and promote discoverability for DDBHH audiences, DWCC recommends the following criteria:

1. **Deaf-led oversight** in the use of AI for sign language content.
2. **Human-in-the-loop verification** for all AI outputs involving linguistic and cultural representation.
3. **Mandatory metadata tagging** to ensure the discoverability of ASL/LSQ-based programs across platforms.

AI may serve as an enabler—but should never substitute for lived experience, cultural authorship, or linguistic integrity.

We thank the Commission for the opportunity to contribute further to this important proceeding and look forward to participating in future phases of the policy review.

Respectfully submitted,

Jeffrey Beatty
Chairperson
Deaf Wireless Canada Consultative Committee (DWCC)

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