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VIA EMAIL DISTRIBUTION and GC KEY

February 20, 2025

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

The CRTC Public Hearing Team
Public Hearings, Canadian Radio-television and Telecommunications Commission (CRTC)
Ottawa, ON K1A 0N2
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Referencing:

Public record: [1011-NOC2024-0318](#)

Re: Making it easier for consumers to shop for Internet services

Re: TNC CRTC 2024-318

1. The Deaf Wireless Canada Consultative Committee - Comité pour les Services Sans fil des Sourds du Canada (DWCC - CSSSC or "DWCC"), hereby submit its intervention and declares its wish and interest in participating in the proceeding.

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Introductions and Descriptions

1. DWCC-CSSSC advances 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.
2. 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.

First Intervention Response

3. On February 14, 2024, the DWCC submitted a detailed survey analysis report for TNC 2024-293. This report aims to provide valuable insights into the needs and preferences of DDBHH Canadians regarding notifications from wireless and service providers. The analysis supplements the ongoing intervention process by offering data-driven recommendations and highlighting the specific requirements of DDBHH individuals. Through this survey, the DWCC seeks to ensure that the CRTC understands and addresses the unique needs of the DDBHH community, fostering

better communication and equitable access to essential telecommunications services.

Response to Question #1

Q1. Should ISPs be required to provide information in a standardized form and manner?

4. **DWCC** believes that a standardized format for broadband consumer labels will make it easier for all consumers to compare and understand internet service plans. This includes those who rely on accessibility measures like ASL/LSQ videos and plain-language materials.
5. A consistent format eliminates confusion, prevents deceptive marketing practices, and helps ensure elimination of concealed charges, unexpected costs, or undisclosed fees. It ensures that all information is accessible and upfront.
6. Standardization guarantees that all crucial information is presented in an accessible and transparent manner, making it easier for everyone—regardless of their abilities—to make informed decisions. This ensures that all individuals, no matter their specific needs, can easily navigate and understand broadband offerings.
7. Additionally, a menu of accessible options on provider websites should be available, offering alternative formats such as:
 - ASL/LSQ videos for DDBHH consumers
 - Plain-language options for those with lower literacy levels
 - Screen reader compatibility for blind and low vision users

Response to Question #2

Q2. Is standardizing the information in a broadband consumer label a good idea? (i) Should the Commission consider other styles or formats?

8. **DWCC** strongly believes that standardized broadband labels, similar to the FCC's Broadband Consumer Label in the U.S., would greatly enhance consumers' ability to understand key service details. These labels should provide clear and concise information about essential service aspects, such as speed, latency, and any potential data limits, allowing consumers to make well-informed decisions when choosing an internet plan.

9. In addition, the CRTC must ensure that these labels are universally accessible to all Canadians, including those with diverse communication needs. This includes mandating ASL and LSQ video versions of the labels to ensure DDBHH consumers have equal access to critical information. The labels also should be available in multiple accessible formats, such as braille, large print, and screen reader-compatible digital formats, to accommodate individuals with disabilities.
10. By making these labels accessible in a variety of formats, we ensure that all Canadians, regardless of their abilities, can navigate and fully comprehend broadband service offerings.

Response to Question #3

Q3. What kind of information should be found in a broadband consumer label?

11. **DWCC** believes that consumer label should include the following:
 - Download/upload speeds (both advertised and typical during peak hours).
 - Latency and jitter rates, as these affect video calls, an essential tool for DDBHH consumers.
 - Data caps and any throttling policies in addition to unlimited data.
 - Accessibility-related features (e.g., ASL/LSQ customer support, alternative format contract availability).
 - Complaint process, including CCTS contact information.
12. **DWCC** emphasizes the importance of DDBHH having access to unlimited stable, high-speed internet for real-time sign language communication through video calls without throttling or any other interruptions that decrease video quality, especially for emergency calls via Video Relay Services (VRS) or direct video communication.

Response to Question #4

Q4. Should Canadians have access to broadband consumer labels in a pre-sale situation, post-sale situation, or both? If so, in what formats should these labels be offered?

13. **DWCC** strongly believes that Canadians must have access to broadband labels in both, pre-sale and post-sale situations. Accessibility considerations for DDBHH individuals must prioritize from the start, not treated as an afterthought.
14. Pre-sale transparency ensures DDBHH individuals can make informed decisions when selecting a plan. This means when they purchase a plan, they should have

options for interacting with the internet service provider, such as access to an in-person interpreter or video remote interpreting. Information about internet speed, data limits (preferably unlimited), and costs must be clearly communicated so they can choose a plan that meets their needs.

15. Post-sale transparency ensures DDBHH individuals easily verify their service terms and have easy access labels in accessible formats, both digital (e.g., PDFs, accessible websites) and physical (e.g., in-store or by mail upon request). When seeking assistance from their internet provider, communication must accommodate their preferred method, including the use of appropriate language and communication tools, to ensure they receive the support they need effectively.

Response to Question #5

Q5. Any broadband consumer label the Commission adopts must be machine-readable. Are there any other accessibility-related considerations that the Commission should be aware of?

16. **DWCC** advances for broadband labels to be made available in plain language to accommodate various literacy levels, including those with cognitives and learning disabilities. This would ensure that everyone, regardless of their reading abilities, can easily understand the information.
17. Furthermore, ISP websites must include ASL and LSQ videos and captions on all videos to ensure DDBHH individuals can fully access information. These will ensure that all individuals, regardless of their language or communication needs, can access and understand broadband information.
18. Additionally, providing clear and comparable information on network performance is essential. Consumers should be able to easily compare factors like internet speed, reliability, data limits, and any service guarantees to make informed decisions about the plans that best meet their needs. Standardized, transparent labels will help remove confusion and allow for more straightforward comparisons.

Response to Question #6

Q6. Which network performance and service quality metrics would be most useful to consumers?

19. **DWCC** strongly believes that the most useful network performance and service quality metrics for consumers would include:
- a. **Peak Period Speeds:** It's essential to provide real-world speeds during peak usage times, not just the maximum advertised speeds. Consumers want to know how their service will perform when demand is highest, like during evenings or weekends, to ensure they get reliable performance when they need it most.
 - b. **Latency and Jitter Rates:** These are critical for activities such as video calls, online gaming, and live streaming. High latency and jitter can cause lag or poor video quality, which are significant concerns for users who rely on smooth, real-time communication.
 - c. **Service Reliability:** This includes the frequency of outages and the time taken to resolve them. Consumers need to know how often they can expect disruptions and how quickly they can expect their service to be restored. This transparency helps manage expectations and fosters trust between the provider and the customer.
20. These metrics provide a more accurate picture of the actual experience consumers can expect from their internet service, allowing them to make informed decisions based on performance, not just marketing claims.

Response to Question #11

Q11. Should ISPs be required to use the same measurement methodologies to obtain these performance metrics? Why or why not?

21. **DWCC** advances uniform and consumer-friendly measurement standards that ensure transparency and accessibility for the DDBHH community, making it easier for them to understand and assess broadband services. This approach should include standardized test results that are publicly available in formats accessible to all consumers, such as easy-to-read reports, infographics, or captioned videos. By providing these test results in a variety of accessible formats, internet service providers can ensure that individuals with different communication needs, including those who use ASL/LSQ are able to access important information.
22. Furthermore, it's essential to accurately reflect real-world user experiences, particularly for individuals who rely on video calls, online meetings, or other real-time communications. This includes considering factors such as latency, jitter, and video/audio quality during peak usage times, as these are critical for activities like work meetings, telehealth consultations, or online education. Providing performance

metrics that directly address these needs—such as specific data on video call quality and communication reliability—will help consumers make better-informed decisions.

23. By implementing these accessibility-focused measures, the broadband industry can foster greater trust and inclusion, ensuring that all consumers, regardless of their communication preferences or abilities, can make informed decisions based on relevant, clear, and accessible information. This commitment to accessibility and transparency would promote a more equitable internet service environment for Canadians.

Response to Question #12

Q12. How can these measurements account for urban, rural, remote, and regional differences in performance?

24. **DWCC** highlights how network performance disparities disproportionately impact DDBHH consumers, particularly in rural or remote areas where reliable video relay services (VRS), FaceTime, and real-time text (RTT)-based emergency calls may be severely compromised by lower-quality networks. These services are crucial for DDBHH individuals, who rely on video calls and text-based communication to access vital information, support, and emergency services. In areas with inadequate network performance, these essential services may become unreliable, leading to communication barriers that could jeopardize safety and access to services.
25. **DWCC** advances for measurement approaches that go beyond simple speed tests and incorporate real-time communication metrics, such as latency, jitter, and call quality, to provide a more accurate reflection of the actual experience for DDBHH users. These metrics should specifically address the performance of services like VRS and videocalls, as these are central to communication for many in the DDBHH community. By focusing on real-time metrics, providers would gain a clearer picture of how their networks perform under the conditions that matter most to consumers, especially those who rely on these services for daily communication and emergency situations.
26. This approach would ensure that the needs of DDBHH individuals are prioritized in network performance assessments and help ensure more equitable service for all Canadians, regardless of their location or communication needs.

Response to Question #13

Q13. Should ISPs (i) use a software-based testing methodology, (ii) undertake hardware-based testing, or (iii) develop their own in-house application (similar to the FCC) and make that tool available to the general public?

27. **DWCC** believes there should be a consumer-trusted and independent testing approach to assess broadband performance, rather than relying solely on ISP-developed tools, which may lack transparency and could be biased towards the provider's interests. Independent testing would provide a more accurate, objective view of network performance, helping consumers make informed choices based on reliable data.
28. Furthermore, **DWCC** argues that testing should include real-world use cases that are relevant to everyday needs, such as video calling, streaming with captions, and other accessibility requirements. These use cases are especially important for DDBHH individuals, who rely on video calls for communication and captioning on streaming services for news, politics, entertainment, events, sports, and education. By focusing on these real-world scenarios, the testing approach would reflect the actual experience of consumers who depend on these services to meet their communication and content consumption needs.
29. This consumer-focused, independent testing approach would ensure that broadband performance metrics are not only accurate but also inclusive of the diverse needs of all consumers, particularly those with specific accessibility needs. It would help build trust among consumers and ensure they have access to the most transparent and relevant information when choosing broadband services.

Response to Question #16

Q16. What type of contextual information would be helpful to understand network performance metrics such as Internet speed, latency, and jitter?

30. **DWCC** recommends that ISPs provide clear, real-world contextual explanations for internet speed, latency, and jitter. This will help consumers, particularly the DDBHH community, understand how network performance impacts essential services like video calls, video relay services (VRS), real-time text (RTT) 911, and captioned streaming.

31. Here are the key recommendations:

1. Internet Speed (Download/Upload) Context:

- 50 Mbps+ / 10 Mbps+ → Ideal for smooth video calls & VRS.
- 25 Mbps / 5 Mbps → May cause lag in group calls and captions.
- Below 10 Mbps / 1 Mbps → Severe disruptions in video calls & captions.

2. Latency (Ping) Context:

- Under 50ms → Excellent for ASL/LSQ video calls.
- 50ms - 100ms → Noticeable lag in sign language communication.
- 100ms+ → Poor for VRS & RTT 911, causes major delays.

3. Jitter Context:

- Less than 10ms → Stable video/captions.
- 10ms - 30ms → Occasional delay in captions/videos.
- 30ms+ → Choppy ASL, dropped captions, RTT/VRS failures.

4. Accessibility-Oriented Consumer Tools:

- Visual chart: Showing if a connection is suitable for FaceTime, Zoom, VRS, and RTT 911.
- Interactive tool: Allowing users to input their needs (e.g., video calls, streaming) to receive personalized speed/latency recommendations.
- Live network test: Focused on the quality of ASL/LSQ video communication to provide real-time performance feedback.

32. ISPs must provide clear, accessible, and standardized contextual information to ensure that DDBHH consumers can make informed choices about network quality based on their specific communication needs. By offering this level of transparency and tailored tools, ISPs can help ensure that consumers understand how network performance will impact their essential communication services.

Response to Question #17

Q17. Are there other network performance metrics that could benefit from contextual information? If so, what are they?

33. Beyond speed, latency, and jitter, **DWCC** identifies three additional network performance metrics that require clear contextual information to ensure DDBHH consumers can make informed decisions about their Internet services:

1. Packet Loss

- Packet loss disrupts the stability of video calls and captioning accuracy in VRS and RTT services.
- Context:

- 0% - 1% packet loss → Excellent for video calls and smooth ASL/LSQ communication.
- 1% - 3% packet loss → Occasional video/caption freezes in Zoom, FaceTime, and VRS.
- 3%+ packet loss → Severe disruptions in VRS, RTT, and live captioning (e.g., dropped words, video stutter).

2. Network Congestion & Peak-Time Performance

- Many ISPs advertise high speeds that drop significantly during peak usage hours, which affects video call reliability.
- Context:
 - Stable speeds during peak hours → Ideal for consistent VRS and ASL/LSQ calls.
 - Frequent slowdowns during peak hours → Causes delayed captions and lagging video during sign language communication.
 - Severe slowdowns (even with high-speed plans) → Unusable for RTT 911 and live captioning services.

3. Mobile vs. Home Internet Performance

- Many DDBHH consumers rely on mobile data for communication. ISPs often fail to provide clear comparisons between home broadband and 5G/LTE speeds and reliability.
- Context:
 - Home vs. Mobile Speeds & Latency should be clearly listed for consumers to compare their options.
 - Wi-Fi calling performance should specify if it's stable for FaceTime/VRS or unreliable during network congestion.
 - 5G vs. LTE real-world speeds should be provided, including differences for urban vs. rural areas.

34. **DWCC** urges ISPs to provide clear, accessible, and standardized information on packet loss, network congestion, and mobile vs. home network performance. This will ensure that DDBHH consumers can assess whether their internet service is suitable for video-based communication, emergency RTT calls, and captioned services. By offering these metrics in an easy-to-understand format, ISPs can empower consumers to make informed decisions based on their unique communication needs.

Response to Question #18

Q18. At what point should this information be provided? Should it be provided in pre- and/or post-sale materials?

35. **DWCC** strongly supports making network performance information available at multiple stages to ensure DDBHH consumers can make informed decisions both before and after subscribing to a service.

1. Pre-Sale Information (Before Purchase)

- Consumers need clear, accurate, and accessible data before choosing an internet plan, especially for video-based communication needs.
- What should be included:
 - Standardized broadband label (similar to the FCC's), listing download/upload speeds, latency, jitter, packet loss, and peak-time performance.
 - Comparison tools that show real-world performance differences in urban, rural, and mobile environments.
 - ASL/LSQ video explanations to ensure full accessibility for DDBHH consumers.

2. Post-Sale Information (After Purchase)

- Consumers must be able to verify if the service meets expectations and understand any performance issues after subscribing.
- What should be included:
 - Real-time network performance dashboard available via ISP apps/websites to track speed, latency, and jitter.
 - Notifications if speeds drop below promised levels, allowing consumers to file complaints or request adjustments.
 - Accessible troubleshooting guides, including step-by-step support in ASL/LSQ, to help consumers resolve network issues.

36. **DWCC** urges the CRTC to mandate pre-sale transparency and post-sale accountability, ensuring that DDBHH consumers receive clear, accessible network performance information before subscribing and have real-time access to verify service quality afterward. This will empower consumers to make informed decisions and hold ISPs accountable for delivering on their promises.

Response to Question #19

Q19. Where should this information be located? For example, should it be added on a standardized label, in a separate document, to the ISPs' websites, etc.?

37. **DWCC** supports multiple, accessible locations for network performance information to ensure DDBHH consumers can easily find and understand critical service details both before and after subscribing. These include:

1. Standardized Broadband Label (Mandatory & Easily Visible)
 - A nutrition-style broadband label, like the FCC's, ensures clear and consistent comparisons across ISPs.
 - Placement:
 - On ISP websites next to all advertised internet plans.
 - In-store displays at telecom retailers.
 - In digital and physical copies of service agreements.
 - ASL/LSQ video versions available on ISP websites for full accessibility.
2. ISP Websites & Mobile Apps (Real-Time Tracking & Transparency)
 - Consumers should have ongoing access to network performance data beyond pre-sale marketing.
 - Placement:
 - A consumer dashboard within ISP apps showing live speed, latency, jitter, and congestion status.
 - Alerts and notifications when service fails to meet promised performance (e.g., slowdowns or outages).
 - Interactive coverage maps showing real-world mobile network performance.
3. Customer Bills & Post-Sale Communications
 - Consumers should be reminded of their service performance rights and have easy access to reporting options.
 - Placement:
 - Monthly bills or account summaries should include a speed verification report.
 - Post-sale emails or SMS notifications should link to performance testing tools and consumer complaint channels.

38. **DWCC** urges the CRTC to require ISPs to provide network performance details through a standardized broadband label, real-time ISP apps, and consumer account materials. This ensures full transparency and accessibility for DDBHH consumers, empowering them to make informed decisions and hold service providers accountable.

Response to Question #20

Q20. Do you agree that ISPs that are subject to the Internet Code should similarly be subject to any new consumer protections implemented as a result of this proceeding?

39. **DWCC** strongly agrees that ISPs subject to the Internet Code should also be required to follow any new consumer protections introduced through this proceeding. These include:

1. Ensuring Consistency Across All Consumer Protections

- The Internet Code already establishes basic consumer rights, but there are gaps, especially regarding network transparency and accessibility needs.
- What should be included:
 - Any new rules on network performance transparency, standardized broadband labels, and real-time service tracking should apply equally to all ISPs under the Internet Code.
 - DDBHH consumers rely on clear, accessible, and standardized information for essential communication services like VRS, FaceTime, and RTT 911.

2. Strengthening Accountability for Service Quality

- Many ISPs advertise high speeds but fail to deliver consistent service, which impacts accessibility for DDBHH consumers.
- What should be included:
 - Mandatory performance reporting under the Internet Code to prevent misleading advertising practices.
 - Consumer compensation mechanisms if actual service consistently falls below advertised performance.

3. Accessibility and Complaint Handling Improvements

- DDBHH consumers often face additional barriers when dealing with ISPs regarding service complaints.
- What should be included:
 - Stronger enforcement mechanisms within the Internet Code for non-compliance with performance transparency rules.
 - Better ASL/LSQ complaint support to ensure DDBHH consumers can effectively report violations and resolve issues.

40. **DWCC** urges the CRTC to extend all new consumer protections to ISPs under the Internet Code, ensuring standardized, accessible, and enforceable protections for all consumers, including the DDBHH community.

Response to Question #21

Q21. Should a different approach to addressing consumer protections complaints be considered that would be more responsive to the needs of consumers? If so, provide your rationale.

41. **DWCC** supports a new, more responsive approach to handling consumer protection complaints, particularly for DDBHH consumers who face barriers in reporting and resolving issues with ISPs. Some recommendations include:

1. Dedicated Accessibility Complaint Mechanism

- Many DDBHH consumers struggle with traditional complaint systems that lack ASL/LSQ support or require phone-based communication.
- Proposed improvement:
 - Establish a dedicated accessibility complaints office within the CRTC or CCTS specifically for DDBHH telecom issues.
 - Provide ASL/LSQ video submission options for complaints to ensure full accessibility.
 - Implement real-time chat and text-based complaint channels for faster resolutions.

2. Stronger Enforcement & ISP Accountability

- Many ISPs fail to address recurring consumer complaints about misleading advertising, poor service quality, and network transparency.
- Proposed improvement:
 - Require public tracking of complaints and ISP responses to increase transparency.
 - Implement fines or mandatory service credits for ISPs with repeated complaints regarding speed, latency, or accessibility failures.
 - Ensure proactive monitoring of ISP compliance, rather than relying solely on consumer-initiated complaints.

3. Faster Resolution & Escalation Pathways

- Many consumers experience long delays in complaint resolutions, leaving them with poor service and no accountability.
- Proposed improvement:
 - Introduce a fast-track resolution process for critical complaints (e.g., RTT 911 failures, inaccessible ISP websites).
 - Ensure ISPs respond within a strict timeframe (e.g., 10 business days for urgent accessibility complaints).
 - Allow third-party advocacy groups, like DWCC, to escalate systemic issues directly to the CRTC for faster intervention.

42. **DWCC** urges the CRTC to implement a more accessible, transparent, and responsive complaint-handling system, ensuring that DDBHH consumers have equal access to resolving service issues and holding ISPs accountable.

Response to Question #22

Q22. Should the Commission collect and publish data on its website from ISPs about instances where services are not meeting their obligations? If so, what data should be collected and published and at what level of detail?

43. **DWCC** strongly supports the Commission's initiative to collect and publicly publish data on ISPs that fail to meet their service obligations. Transparency is critical for consumer protection, accountability, and ensuring equitable access to reliable services for all Canadians, particularly DDBHH consumers.

44. **DWCC** thought public data on ISP Compliance is necessary because:

- a. Consumers currently lack visibility regarding which ISPs consistently fail to deliver on promised speeds, reliability, and overall service quality.
- b. For DDBHH consumers, transparency is even more essential, as disruptions in services like VRS, RTT 911, and captioned streaming can have a profound impact on their ability to communicate.
- c. Public reporting helps increase ISP accountability, discouraging misleading claims about speed, latency, and accessibility features.

45. **DWCC** recommends that the following performance data be collected and published in an accessible format, complete with ASL/LSQ video explanations to ensure inclusivity:

- a. Speed Performance Metrics:
 - i. Real-world download and upload speeds versus advertised speeds.
 - ii. Speed consistency during peak usage times.
- b. Latency & Jitter Data:
 - i. Essential for real-time video communications such as VRS, FaceTime, and RTT 911.
- c. Service Outages & Network Congestion:
 - i. Frequency and duration of outages, particularly differentiating urban vs. rural impact.
 - ii. Consumer-reported issues with slowdowns, throttling, or degraded performance.
- d. Accessibility & Customer Support Complaints:
 - i. Complaints related to RTT 911 failures, ASL/LSQ support, and general ISP accessibility barriers.
- e. ISP Compliance with the Internet Code & CRTC Orders:
 - i. Violations of transparency rules, misleading advertising, or failure to meet mandated service obligations.

46. **DWCC** recommends that the data should be published
- a. Regular, quarterly ISP performance reports available on the CRTC's website.
 - b. An interactive, searchable database that allows consumers to easily check the compliance history of their ISP.
 - c. ASL/LSQ video summaries of ISP performance data to ensure full accessibility.
 - d. Email alerts or notifications whenever an ISP is flagged for repeated violations or poor performance.
47. **DWCC** urges the CRTC to publicly track and regularly update ISP compliance data, providing transparent and independently verified performance records that will empower DDBHH consumers and all Canadians to make well-informed decisions when selecting an ISP."

Response to Question #23

Q23. If repeated complaints about pre- and/or post-sale information are received, what additional measures could the Commission implement?

48. **DWCC** strongly supports the implementation of stricter enforcement measures for ISPs that repeatedly fail to provide accurate, clear, and accessible pre-sale or post-sale information. Transparent and accessible details on network performance, pricing, and accessibility features are essential for all consumers, especially DDBHH individuals, to make informed choices about their services.
49. **DWCC** makes the following recommendations:
- a. Mandatory Corrective Actions for ISPs
 - i. ISPs with a history of repeated complaints regarding misleading or inaccessible information should be required to take corrective actions.
 - ii. Examples of corrective actions include:
 - iii. Public Warnings & Compliance Reports:
 - iv. Listing ISPs that fail to meet transparency standards, providing visibility to consumers.
 - v. Mandatory Refunds or Credits: Offering refunds or credits to consumers who were misled by misrepresented plans or inaccessible information.

- vi. Independent Third-Party Audits: Conducting audits of ISP advertising, contract terms, and customer disclosures to ensure they align with accuracy and transparency standards.
- b. Stronger Enforcement & Financial Penalties
 - i. Many ISPs continue deceptive practices due to weak penalties that fail to deter them from misleading consumers.
 - ii. Proposed measures include:
 1. Escalating Fines: Implementing progressively higher fines for ISPs that repeatedly mislead consumers with inaccurate or inaccessible information.
 2. Service Suspension or License Review: Considering suspension of services or a review of licenses for ISPs that persistently violate transparency rules.
 3. Consumer Compensation Fund: Establishing a fund where consumers affected by misleading sales practices automatically receive bill credits to compensate for deceptive advertising.
- c. Improved Accessibility & Consumer Education
 - i. Many complaints arise due to the lack of accessibility in ISP communications, such as the absence of ASL/LSQ videos and overly complex contract language.
 - ii. Proposed improvements include:
 1. ASL/LSQ Video Disclosures: Requiring ASL/LSQ video disclosures for all major service plan changes to ensure accessibility for DDBHH consumers.
 2. Plain-Language Contract Summaries: Providing easy-to-read contract summaries alongside detailed terms to make information clearer for all consumers, especially those with lower literacy or cognitive challenges.
 3. Consumer Awareness Campaigns: Launching stronger public campaigns to help consumers recognize, report, and avoid misinformation from ISPs.

50. **DWCC** urges the CRTC to implement strict penalties, enforce mandatory corrective actions, and promote better accessibility measures to hold ISPs accountable for repeated failures in pre-sale and post-sale transparency. These actions will protect all consumers, ensuring that DDBHH individuals and others have equitable access to accurate, clear, and fair service information.

Participation in the Proceeding

51. DWCC, along with its partnering organizations, has prepared a **comprehensive response** to 17 key questions in this proceeding. DWCC's intervention highlights **critical accessibility concerns** and consumer protection needs for **DDBHH Canadians** in selecting and using Internet services.
52. DWCC looks forward to **actively participating in this critical proceeding** by contributing to the **reply phase** and continuing to advocate for **clear, accessible, and consumer-friendly network transparency measures**.
53. Furthermore, DWCC believes that it has **accumulated sufficient evidence** from its extensive **accessibility-focused research and engagement** to **significantly and meaningfully contribute** to the **CRTC's deliberations in TNC 2024-318 – Call for comments: Making it easier to choose a wireless phone or Internet service – Enhancing customer notification**.
54. DWCC appreciates the Commission's **consideration of our interventions**, which **reinforce the accessibility requirements and consumer protections** necessary for equitable Internet access.
55. Should the Commission require any **further information or clarification**, please do not hesitate to contact us.

Sincerely,

Jeffrey Beatty, Chair
Deaf Wireless Canada Consultative Committee -
Comité pour les Services Sans fil des Sourds du Canada (DWCC-CSSSC)

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