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## **VIA EMAIL DISTRIBUTION and GC KEY**

**March 26, 2025**

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### **Re: TNC CRTC 2024-318-2 Making it easier for consumers to shop for Internet services**

1. Deaf Wireless Canada Consultative Committee—Comité pour les Services Sans fil des Sourds du Canada (**DWCC—CSSSC** or “**DWCC**”) respectfully submits this final reply in response to Telecom Notice of Consultation [CRTC 2024-318-2](#). This submission presents **DWCC**’s positions, concerns, and recommendations regarding *Making it easier for consumers to shop for Internet services*.
2. **DWCC** appreciates the opportunity to contribute to this consultation and acknowledges the Commission’s efforts to improve consumers’ ability *to shop for Internet services*.
3. **DWCC** views this proceeding as aiming to enhance consumers’ ability *to shop for Internet services* by ensuring that Canadians, including those who are DDBHH, can easily modify or cancel their service plans through accessible self-service mechanisms. A key focus is to understand the current landscape of self-service options and identify necessary improvements to ensure inclusion. Additionally, the proceeding will examine safeguards to ensure that persons with disabilities

can fully access and navigate the ability *to shop for Internet services* without barriers.

4. This involves evaluating what ability *to shop for Internet services* are essential, how Canadians should be able to access these tools, and whether self-service options should replace traditional support methods. Consideration will also be given to potential restrictions on fees for using such services, privacy protections when integrating technologies like machine learning or AI, and whether certain providers should be exempt from offering self-service options. Ensuring that self-service mechanisms meet the needs of all consumers, including those who rely on communication accessibility, is critical to fostering an equitable and user-friendly telecommunications environment.
5. As accessibility advocates, we emphasize that DDBHH consumers face systemic barriers in communication accessibility when it comes to self-service mechanisms., thus, the **DWCC** appreciates the opportunity to participate with the reply comments for its final reply for this consultation to ensure equitable and inclusive policies for the diverse communities served by Canadian telecommunications including the Deaf, Deaf-Blind, and Hard of Hearing (DDBHH) communities.
6. Before we begin, It needs to be clarified and emphasized when **DWCC** writes DDBHH, for Deaf, Deaf-Blind and Hard of hearing, it is inclusive of all those with intersectional identities listed in its intervention.
7. **DDBHH** is an umbrella term that encompasses all intersectional identities within the **Deaf, DeafBlind, and Hard of Hearing** communities, including **Indigenous Deaf** individuals, ensuring broad representation while recognizing diverse cultural and linguistic experiences.
8. **DWCC** asks that **the Commission** listen to its **Indigenous Deaf consultant**, who has explained that the term another consumer group choice word of "**Deaf Indigenous**" is unacceptable, as Indigenous people are always Indigenous first before they are Deaf.
9. Accordingly, **DWCC** submits its responses to the proceeding's questions to participate in this reply phase of the consultation. Where technical expertise is beyond our scope, we will provide our position through statements addressing the questions to the best of our ability, with an advocacy lens. Please note, we made any accessible-related words in **bold-type font** because Committee team members wanted to show emphasis on accessibility.

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## Executive Summary

**ES1:** The **DWCC-CSSSC** strongly supports the implementation of a **standardized, accessibility-first broadband consumer label**. Throughout the 2024-318 proceeding, a wide coalition of public interest groups — including **CDGM, CCTS, the Competition Bureau, DHH Coalition, PIAC**, and others — reinforced the urgent need for transparency, **accessibility, and comparability** in ISP service information. These groups echoed **DWCC's** emphasis on **ASL/LSQ integration**, plain language, and region-specific data.

**ES2:** In contrast, major ISPs — including **Bell, TELUS, Rogers, Quebecor**, and **SSi Canada** — argued against mandated standardization. They cited concerns over **implementation costs, branding flexibility**, and the risk of “**consumer overload.**” **DWCC** refutes these claims and emphasizes that such resistance reflects a systemic disregard for accessibility and user autonomy, particularly for **DDBHH** and rural consumers.

**ES3:** **DWCC** consistently advocated for labels that are **visual, signed, bilingual**, and context-aware, and performance metrics that include latency, jitter, and packet loss, which directly impact real-time communications used by **DDBHH** Canadians. We underscored that access to this information must be available pre-sale, post-sale, and throughout the consumer journey — not on request or hidden in hyperlinks.

**ES4:** We call for enforcement mechanisms, public dashboards on ISP non-compliance, **mandatory ASL/LSQ** complaint tools at **CCTS**, and a regulatory framework that includes penalties for repeated violations. These recommendations are aligned with the

**Accessible Canada Act**, the CRTC's **2023 Policy Direction** (Sections 2(d), 17(c)), and Canada's international commitments to **digital equity**.

**ES5:** In sum, **DWCC** urges the Commission to adopt an enforceable, standardized broadband disclosure model that centers **accessibility**, removes information asymmetries, and empowers all Canadians — especially those in the **DDBHH and equity-deserving communities** — to make informed decisions in the telecom marketplace.

## REPLY TO Q1

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

### DWCC's Position and Overview

10. The DWCC strongly supports the mandatory implementation of standardized broadband consumer labels across all Internet Service Providers (ISPs) in Canada. **DWCC** affirms that standardization is not merely a technical or consumer marketing concern—it is a fundamental accessibility and equity issue that directly impacts the **DDBHH** community. Without a clear, uniform format, critical service details—such as internet speed, latency, pricing, and accessibility supports—are often obscured, inconsistently presented, or simply inaccessible to consumers who rely on visual and signed communication.
11. **DWCC** asserts that standardization enhances transparency, ensures service comparability, and eliminates ambiguity and deceptive marketing practices. It also allows for full participation in the telecommunications marketplace, regardless of literacy level, language background, or disability. **DWCC** emphasizes that any standardized format **must include ASL and LSQ video** components, plain language content, screen-reader compatibility, and be consistently available across all sales and service channels.
12. This position aligns with key legislative and regulatory obligations, including the **Accessible Canada Act**, the **CRTC's 2023 Policy Direction** (especially sections 2(d) and 17(c)), and the principles outlined in the *Telecommunications Act*, which requires service clarity and typical performance disclosures. A standardized, accessible label is not just a consumer right—it is a legal necessity.

## DWCC's Reply to Consumer Groups

13. **DWCC** recognizes strong alignment with several consumer advocacy organizations regarding the need for mandatory standardized broadband labels.
14. The **Competition Bureau** supports standardized labels to enhance consumer choice and reduce cognitive burden, noting that ease of switching and accurate comparisons are critical to fostering competition.
15. The **CCTS** supports standardization to address mismatches between consumer expectations and actual service delivery—complaints which are frequently rooted in unclear or incomplete pre-sale information.
16. **PIAC** strongly endorses a Canadian version of the “Broadband Nutrition Label,” referencing its 2022 “Selling Speed” report. PIAC urges the Commission to avoid weak implementation or voluntary compliance and calls for enforceable, visual, and consumer-friendly disclosure tools.
17. The **Manitoba Coalition (CAC)** points to its 2023–2024 survey, confirming the public’s demand for simple, straightforward, and enforced disclosure of service quality and pricing information.
18. **Pavlović et al.** (Common Law Section) support enforceable and visually intuitive labels informed by consumer behaviour studies, proposing SSL benchmarks and traffic-light formats for usability.
19. **Option consommateurs** supports plain and understandable labelling, advocating for the elimination of misleading terminology such as “up to” and the inclusion of contextualized explanations.
20. The **City of Calgary** also strongly supports standardization, calling for ASL/LSQ-compatible digital formats and emphasizing equity considerations for underserved communities, with their wording *“to ensure internet services are made to support those with accessibility needs there should be standards put in place to communicate what to expect out of an internet service, for example to support those who use real time video sign language.”*
21. **DWCC** aligns with these groups in concluding that standardized, accessible labels are critical for reducing service confusion, increasing informed decision-making, and enabling regulatory oversight.

22. **DWCC** strongly aligns with and fully supports the positions of the **DHH Coalition** and **CDGM** in advocating for standardized, accessible labels. Standardization is essential for reducing service confusion, increasing informed decision-making, and enabling regulatory oversight.
23. The **DHH Coalition** has emphasized that visual and sign language formats are necessary to eliminate systemic information barriers, ensuring that Deaf and Hard of Hearing users can participate equitably in the telecom marketplace. Similarly, **CDGM** has called for label standardization across all ISPs and sales platforms, urging the Commission to require icon-based and ASL/LSQ-integrated labels for DDBHH\* users. **DWCC** fully supports these measures as critical steps toward accessibility and consumer empowerment.
24. In contrast, several major ISPs and telecom industry stakeholders oppose or express caution regarding mandated standardization.

### **DWCC's Reply to Telco's**

25. **Bell, Rogers, Eastlink, Cogeco, Quebecor, and TELUS** oppose prescriptive standardized labels, arguing that consumers are already well-informed and that satisfaction levels (reported at 72–85%) indicate no need for further regulation. These providers raise concerns about implementation costs, potential information overload, and restrictions on brand flexibility and innovation.
26. **SSi Canada** specifically opposes detailed retail regulation, favouring market-driven solutions. They caution that prescriptive disclosure rules could undermine innovation and competition in remote and rural markets where smaller ISPs operate under different constraints.
27. **DWCC** respectfully disagrees with these positions. Claims of high consumer satisfaction do not account for ongoing complaints, accessibility gaps, or the exclusion of DDBHH users from meaningful participation in service decisions. Arguments of “overregulation” and “consumer overload” often obscure that real, actionable information is still lacking for marginalized populations.
28. The assertion that consumers are “already well-informed” directly contradicts data from the **CCTS**, public interest groups, and **DWCC**’s own findings, which consistently show widespread confusion, inconsistent disclosures, and exclusionary practices—particularly for accessibility-dependent users.

29. **DWCC** emphasizes that brand identity and marketing flexibility must not supersede the public's right to clarity, comparability, and accessibility. Innovation should serve inclusion—not act as a shield against regulation.

### **DWCC's Concluding Position to Q1**

30. **DWCC** strongly urges the Commission to mandate a **standardized broadband consumer label** across all ISPs in Canada—regardless of provider size, business model, or platform. This label must be:

- **Bilingual and accessible**, with integrated ASL and LSQ video formats
- **Plain language and icon-based**, to support low-literacy and neurodivergent users
- **Screen reader-compatible**, for blind and partially sighted users
- **Consistent across all distribution channels**, including online, in-store, and third-party retailers

31. Standardization must be rooted in **accessibility by design**, not tacked on as an afterthought or left to provider discretion. Without clear, enforceable guidelines, consumers—particularly DDBHH Canadians—will continue to face exclusion, confusion, and inequity in navigating essential services.

32. **The Commission** can lead by embedding universal design principles into telecom regulation. Adopting a standardized broadband label is not just a consumer protection tool—it is a declaration of the Commission's commitment to accessibility, transparency, and digital inclusion for all.

33. **DWCC** respectfully urges the Commission to act decisively, ensuring that standardized broadband labels become a regulatory reality and an accessibility rights milestone.

### **REPLY TO Q2**

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

### **DWCC's Position and Overview**

34. The **DWCC** affirms that standardized broadband consumer labels are not only a good idea—they are **urgently necessary**.

35. **DWCC** stresses that the absence of a uniform, accessibility-centered label leaves many Canadians—especially members of the Deaf, Deaf-Blind, and Hard of Hearing (DDBHH) community—unable to make informed decisions about their telecommunications services.
36. **DWCC** believes that **the Commission** must not only require standardization of label content but must also define the style and format based on inclusive design principles. This means going beyond static PDFs or hyperlinked documents and creating labels that are **accessible, visual, and multi-format**, meeting the full range of communication needs across Canada’s diverse population.
37. **DWCC** recommends that the Commission adopt a broadband consumer label format modeled on the **FCC’s Broadband Nutrition Label**, but adapted to Canadian legal obligations under the Accessible Canada Act, the Official Languages Act, and the CRTC’s 2023 Policy Direction.
38. However, where U.S. models fall short—particularly in providing visual language access—Canada must lead by example through **embedded ASL/LSQ videos, plain language summaries, and screen reader-compatible design**.

### **DWCC’s Reply to Consumer Groups**

39. **DWCC** notes strong consensus among public interest organizations for the implementation of a standardized broadband label—both in **content and format**.
40. The **Competition Bureau** supports a format modeled on the FCC’s label, adapted for Canadian law. It stresses the need for clear service quality metrics, all-in pricing, and disclosure of contract limitations—all of which **DWCC** endorses, particularly for clarity and comparability.
41. The **CCTS** supports standardization to reduce the frequency of consumer complaints caused by mismatched expectations. Labels that clearly outline service terms would prevent disputes and promote better understanding.
42. **PIAC** recommends a “made-for-Canada” label that is intuitive, visual, and focused on the real-world usability of service offerings. **DWCC** supports **PIAC’s** call for simplified comparison tools and emphasizes that accessibility features—like signed language videos and plain language formats—are necessary extensions of this visual model.

43. The **Manitoba Coalition (CAC)** calls for visual uniformity across platforms and enforcement to ensure consistency. This aligns with **DWCC**'s recommendation for **regulatory oversight and mandatory compliance audits**.
44. **Pavlović et al.** propose a “traffic light” style system with SSL benchmarks and contextual performance examples. **DWCC** welcomes these ideas, particularly their alignment with cognitive accessibility needs and plain language goals.
45. The **City of Calgary** strongly supports the implementation of visual, bilingual (English/French) labels that are **WCAG-compliant** and integrated with online portals.
46. **DWCC** agrees with these groups that the label should **not merely exist as a marketing document**—it must be a **legally enforceable accessibility tool**, equally available and understandable across all consumer demographics.

#### **DWCC's Reply to the Deaf Groups**

47. **DWCC** strongly aligns with and fully supports the positions of the **DHH Coalition** and **CDGM** in advocating for standardized, accessible labels. Standardization is essential for reducing service confusion, increasing informed decision-making, and enabling regulatory oversight.
48. The **DHH Coalition** has emphasized that **visual and sign language formats** are necessary to eliminate systemic information barriers, ensuring that **Deaf and Hard of Hearing** users can participate equitably in the telecom marketplace. Similarly, **CDGM** has called for **label standardization across all ISPs and sales platforms**, urging the **Commission** to require **icon-based and ASL/LSQ-integrated labels** for **DDBHH** users.
49. **CDGM, the DHH Coalition, and DWCC** all call for **video-based, icon-driven, and ASL/LSQ-enhanced formats**. These are not decorative features—they are **essential accessibility tools** that enable **informed participation by DDBHH consumers**.
50. **DWCC** firmly supports these measures as crucial steps toward **accessibility, transparency, and consumer empowerment** within Canada's telecom industry.
51. In contrast, many large ISPs and telecom stakeholders oppose mandatory standardization or format uniformity.

## DWCC's Reply to the Telco Industry

52. **TELUS, Rogers, Bell, Cogeco, Eastlink, and Quebecor** caution against prescriptive regulation, arguing that standardization would restrict brand differentiation, impose high costs, and confuse consumers due to “overly technical” content.
53. These ISPs argue that customer satisfaction rates are already high, and claim that current voluntary disclosures are sufficient. **DWCC** strongly challenges these positions.
54. **SSi Canada** warns that rigid formats may be difficult to apply in rural or satellite markets. While **DWCC** acknowledges infrastructure differences, we assert that **accessibility is not optional based on geography**. Flexibility can exist within a **mandatory accessibility framework—but not as an excuse for exemption**.
55. **DWCC** maintains that leaving label format decisions to individual providers will **only perpetuate inequality**, particularly for consumers who require visual, simplified, or language-modified communication tools. The Commission must ensure that broadband labels are not just available—but **available in a form that everyone can use**.

## DWCC's Concluding Position to Q2

56. **DWCC** calls on the Commission to adopt **a standardized, accessibility-first broadband consumer label format** that is:
- Mandatory across all ISPs, regardless of size or service type
  - **Available in multiple accessible formats**, including ASL/LSQ video, plain language summaries, and large print
  - Enforceable, with compliance monitoring and penalties for omission or non-conformance
  - Integrated into all points of consumer interaction (websites, mobile apps, in-store displays, and contracts)
57. This label must be designed not just with industry in mind—but with the **lived experience of DDBHH and other accessibility-dependent users** at the forefront. It must be tested, user-validated, and contextualized with real-world usage examples (e.g., “suitable for 4 video calls or 2 HD streams”) and intuitive

visual markers.

58. **DWCC** rejects the argument that standardized labels restrict innovation. On the contrary, **standardization enables innovation** by providing a clear foundation upon which inclusive design, informed choice, and competitive transparency can flourish. It also ensures that **accessibility is baked into the system—not tacked on later**.

59. **DWCC**'s Committee urges the Commission to seize this opportunity to lead internationally in telecom accessibility and establish a **Canadian broadband labelling regime** that reflects our national values of equity, inclusion, and universal design.

## REPLY TO Q3

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

#### DWCC's Position and Overview

60. The **DWCC** strongly supports the inclusion of comprehensive, **accessible, and clearly defined information** within broadband consumer labels. These labels must not only list technical specifications but also offer **plain language, visual, and signed language explanations** of what those specifications mean in real-world usage—especially for consumers with accessibility needs, such as Deaf, Deaf-Blind, and Hard of Hearing (DDBHH) users.

61. **DWCC** emphasizes that the consumer label should function as a **navigation tool**, not just a compliance form. The information presented must help Canadians—regardless of their communication method or digital literacy—determine whether a service is suitable for **video calls, captioned media, VRS, RTT, and other accessibility-focused use cases**. For the DDBHH community, the quality of internet service directly affects their ability to **communicate, work, study, and access emergency services**.

62. **DWCC** calls on the CRTC to **mandate the inclusion** of both technical and accessibility service features in every broadband consumer label, presented in a way that enables real-life comparison, usability, and informed decision-making.

#### DWCC's Reply to Consumer Groups

63. **DWCC** acknowledges strong alignment with multiple consumer advocacy organizations regarding the **breadth and clarity** of information that must be

included in broadband consumer labels, as follows.

64. The **Competition Bureau** recommends disclosing all-in pricing, network performance during peak periods, and key service details like contract cancellation policies and customer support standards. **DWCC** strongly agrees and adds that **accessibility support options** must also be disclosed (e.g., availability of VRS, live chat, ASL/LSQ video support).
65. The **CCTS** supports the inclusion of **actual performance metrics** instead of theoretical speeds, and highlights the need for transparent fee disclosures and complaint channels. **DWCC** concurs, emphasizing that consumers—especially those with disabilities—need truthful performance data to avoid misaligned expectations.
66. **PIAC** recommends including visual time-of-day speed charts, simplified descriptions of service capacity (e.g., suitable for video calls, gaming) and plain-language pricing summaries.
67. **DWCC** supports this framework and would extend it to include **ASL/LSQ explainer videos**, high-contrast visuals, and **functionality icons** (e.g., ✓ video calls, ✕ gaming). Icons are visual representations and universally understood.

#### **DWCC and Deaf Groups Response**

68. **DWCC**, alongside **CDGM** and the **DHH Coalition**, strongly emphasizes that accessibility labels must incorporate **signed language video** and **visual formats** to ensure **DDBHH** consumers can make informed decisions. These labels should clearly present key service indicators, including **advertised vs. actual download and upload speeds, latency, jitter, and packet loss**, and the **availability of real-time communication tools** such as **VRS** and **RTT**.
69. Additionally, they must specify **captioning support, large print options, and platform compatibility**. These features are essential for **ensuring equitable access** to telecom services, and **DWCC fully supports their integration as a regulatory standard**.
70. The **Manitoba Coalition (CAC)** calls for the breakdown of pricing, speed tiers, contract terms, and bundled offers in **plain, comparable formats**, which **DWCC** supports—especially when supplemented by accessibility disclosures.

71. **Union des consommateurs** recommends contextual usability information (e.g., whether Zoom, streaming, or remote education is realistically supported). **DWCC** stresses that this type of real-world framing is especially vital for DDBHH users who rely on consistent performance for communication access.
72. **Pavlović et al.** propose using a **Satisfactory Service Level (SSL)** rating framework, contextualized usage indicators, and visual overlays. **DWCC** supports this model as a potential **accessibility-focused** benchmark standard.
73. **DWCC** aligns with these groups in concluding that **contextualized, visual, and multilingual disclosure** is necessary to empower all consumers, particularly those who have long been excluded by technical jargon or abstract service claims. This is where ASL/LSQ is recommended to be provided for Canadian DDBHH.

### **DWCC's Reply to the Telco Industry**

74. **DWCC** notes that several large ISPs—including **TELUS, Cogeco, Eastlink, Quebecor, Rogers, and Bell**—push back against detailed disclosures, particularly of performance metrics like latency, jitter, or packet loss. Their reasoning includes concerns that the metrics are “too technical” and may confuse consumers. They argue that performance can vary by household, making it difficult to provide precise data while also introducing potential legal and reputational risks. As a result, ISPs prefer to limit the label to only include price, speed, and data caps, excluding more detailed performance metrics.
75. **DWCC** fundamentally disagrees with this approach. These ISPs underestimate the consumer’s right to clarity and control, especially for accessibility-dependent users who cannot make service decisions without knowing whether their connection supports VRS, captioning, or ASL/LSQ video.
76. Moreover, the argument that technical metrics are confusing ignores the fact that they can be made understandable through plain language, icons, and signed language video explanations—which **DWCC** recommends as part of a national label standard.
77. **DWCC** also disagrees with **SSi Canada**, which suggests that detailed retail disclosures may be impractical in rural or remote areas. On the contrary, it is precisely in underserved regions that consumers need accurate data about latency, packet loss, and peak performance to determine whether the service is adequate for basic communication, education, or telehealth access.

## DWCC's Concluding Position to Q3

78. **DWCC** urges the Commission to require that all broadband consumer labels include a comprehensive, **accessibility-informed list of information**. At minimum, the label must disclose: key service labels must include typical and maximum download/upload speeds, latency, jitter, and packet loss performance, as well as data caps, pricing (including discounts and fees). They should also clearly outline contract length and cancellation policies, complaint processes and escalation channels, and accessibility features such as VRS and RTT availability, ASL/LSQ customer service options, captioning or large-print compatibility, and the availability of information in ASL/LSQ, braille, and plain language.
79. This information must be **presented with visual icons and layered explanations, available in signed language video and screen-reader formats, and provided consistently across online, mobile, in-store, and third-party platforms** to ensure full accessibility for **DDBHH consumers**.
80. Without these elements, the label risks reinforcing the same **information and accessibility gaps** that have historically excluded DDBHH and other disability communities from telecom decision-making.
81. **DWCC** reiterates that this is not just a matter of transparency—it is a matter of communication accessibility and **functional equivalency**. Canadians with disabilities deserve the same level of confidence and comprehension when selecting services. To deliver that, the Commission must standardize the label format and mandate content that reflects real-life usage, **accessibility** requirements, and consumer protection.

## REPLY TO Q4

**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 (for example, as a standalone document, as part of an existing document, in a digital or physical format, etc.)?**

## DWCC's Position and Overview

82. The DWCC strongly supports the mandatory availability of broadband consumer labels in both pre-sale and post-sale contexts, and across multiple formats. For **accessibility** to be meaningful, it must be continuous, platform-independent, and designed to accommodate the **full communication spectrum used by DDBHH**

consumers.

83. Pre-sale labels allow consumers to make informed decisions before committing to a plan. In contrast, post-sale labels provide a vital reference for confirming service terms, resolving disputes, and managing services independently. Labels must not be limited to a one-time PDF or buried link—they must be **ever-present**, discoverable, and formatted for **accessibility**.
84. Access to information cannot be reduced to a transactional moment—it must be treated as an ongoing accessibility right. **DWCC** maintains that any regulatory framework that limits label access to the point of sale fails to meet the **functional equivalency standard** outlined in the **Accessible Canada Act** and **2023 Policy Direction**.

### **DWCC's Reply to Consumer Groups**

85. **DWCC** sees strong alignment with numerous consumer advocacy organizations emphasizing **multi-phase, multi-format access** to broadband consumer labels.
86. The **CCTS** supports embedding label content in **pre-sale offers and post-sale contracts**, citing that clarity at both stages reduces complaint volumes and helps resolve misunderstandings.
87. **PIAC** affirms the importance of both pre-and post-sale visibility and integration into consumer contracts. **DWCC** agrees, especially for DDBHH users who may revisit the label content with family or interpreters after the initial purchase.
88. **DHH Coalition, CDGM, and DWCC** highlight the need for **persistent accessibility**, especially for consumers who cannot rely on hearing-based interactions or voice-based confirmations. These groups underscore the importance of **signed language videos**, plain language summaries, and physical formats in ensuring **equitable access**.
89. The **Manitoba Coalition** confirms that Canadians expect and demand transparent, simplified broadband information not only during shopping but also throughout the service lifecycle, including renewals and service changes.
90. **Option consommateurs** recommend a **public repository** of broadband labels to ensure all consumers can find, compare, and download labels independently. **DWCC** supports this as a redundancy mechanism that enhances autonomy and

transparency.

91. **Pavlović et al.** recommend integrating labels directly into **Critical Information Summaries (CIS)**, making them a contractual component that must remain visible and enforceable post-sale.
92. The **Independent Telecom Providers Association (ITPA)** supports pre-sale labels with expiry date visibility. While more limited, **DWCC** agrees with the principle of time-sensitive transparency.
93. **DWCC** aligns with these stakeholders in asserting that access to broadband labels must be **persistent, multimodal, and integrated** into the consumer experience from start to finish. By contrast, several ISPs oppose mandated post-sale access.

### **DWCC's Reply to the Telco Industry**

94. **Bell, Rogers, Cogeco, TELUS, Eastlink, and Quebecor** argue that **existing documents like CIS** already meet the requirement for post-sale information and that adding labels would create redundancy or clutter.
95. Some providers express concern that persistent access could trigger additional **administrative burdens** or customer service queries, preferring to limit visibility to pre-sale disclosures only.
96. **DWCC** firmly rejects these positions. Restricting access to the pre-sale stage fails to consider the **lived realities of consumers with disabilities**, who may need multiple days to review materials, assistance from **ASL/LSQ interpreters or support staff**, and the ability to revisit plan details for clarity, billing issues, or service adjustments.
97. Moreover, citing existing documents as “sufficient” overlooks the fact that **most contracts are not accessible**, and that CIS formats lack plain language, ASL/LSQ versions, and digital usability features. **Post-sale accessibility** is not about redundancy—it's about inclusion.
98. **SSi Canada** recommends ISP discretion on how and when to provide labels, particularly in remote contexts. **DWCC** opposes this model, which would **undermine national consistency** and create fragmented access conditions—especially for those already underserved by geography and infrastructure.

## DWCC's Concluding Position to Q4

99. **DWCC** urges the Commission to mandate that broadband consumer labels be:
100. **Available at both the pre-sale and post-sale stages**, across all sales and service channels, including websites and mobile apps, in-store displays and kiosks, customer service phone lines and VRS interactions, email, SMS, and print by request.
101. **Presented in multiple accessible formats**, including: standalone downloadable HTML and screen-reader compatible PDFs, ASL and LSQ signed video versions embedded in ISP websites, braille and large-print versions available upon request.
102. **Integrated into contractual materials**, including Critical Information Summaries (CIS), billing platforms, and customer dashboards.
103. **Persistent and discoverable**, not hidden behind hyperlinks, buried in account settings, or restricted to a single format or access point.
104. **DWCC** reiterates that **accessibility is not achieved by availability alone**—it is achieved through consistency, discoverability, and diverse format support. For DDBHH users, a persistent and inclusive label empowers independent decision-making, dispute resolution, and full participation in the telecommunications market. Pre-sale access ensures informed consent. Post-sale access ensures accountability. Both are necessary. **Anything less would violate the principles of accessibility and functional equivalency** enshrined in Canadian law.

## REPLY TO Q5

**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?**

## DWCC's Position and Overview

105. The **DWCC** strongly affirms that while machine readability is a vital foundation for digital accessibility, it represents only one element of what must be a **comprehensive accessibility framework**. True accessibility requires far more than technical formatting—it demands design decisions based on the **lived experiences of Deaf, Deaf-Blind, and Hard of Hearing (DDBHH) users** and

other equity-deserving communities.

106. To achieve functional equivalency, the Commission must go beyond the WCAG minimum and require that **broadband consumer labels be accessible by design**, not simply retrofitted through back-end formatting. That includes embedding **ASL/LSQ videos**, plain language summaries, high-contrast visual layouts, and multi-format delivery that works across all devices and platforms.
107. **DWCC** stresses that machine-readable formats—such as HTML with ARIA tags and properly structured PDFs—must be supplemented with **visual and linguistic adaptations** tailored to real-world communication needs.

### **DWCC's Reply to Consumer Groups**

108. **DWCC** notes strong alignment with consumer advocacy organizations on the need for accessibility that exceeds bare technical compliance:
109. The **CCTS** emphasizes the importance of embedding accessibility into contractual materials to reduce complaints and improve user understanding. **DWCC** agrees and adds that **signed video summaries and plain language versions** must be available before and after service activation.
110. **PIAC** recommends label designs that include **visual diagrams**, “nutrition-style” templates, and simplified language to address cognitive load. **DWCC** supports this approach and recommends extending it to **Deaf-first visual interfaces that** can be navigated without audio prompts or dense legal text.
111. The **Competition Bureau** supports machine-readable formatting and calls for labels to be available in **multilingual and accessibility-ready formats** as part of a national digital equity strategy. **DWCC** agrees and adds that accessibility in Canada must also include **signed languages**, not just written or spoken ones.
112. **Pavlović et al.** recommend the removal of structural barriers through intuitive layouts and visual layering. **DWCC** echoes this view and supports universal design principles that reduce user friction and cognitive overload.
113. The **City of Calgary** advocates for labels to meet WCAG 2.1+ standards and explicitly include **ASL/LSQ content where** appropriate. **DWCC** agrees and encourages the Commission to adopt a **WCAG 2.2+ standard** while building **beyond WCAG** to incorporate Canada’s legal obligations under the **Accessible**

## Canada Act.

114. **DWCC** aligns with these organizations in concluding that technical accessibility alone is insufficient; **functional, linguistic, and visual accessibility** must be part of the broadband label's core design.

## DWCC and Deaf Groups Response

115. **CDGM, DHH Coalition, and DWCC** all explicitly call for content to be provided in **ASL/LSQ video, plain language, and interactive visual tools**.
116. It is **DWCC's** position that for the DDBHH community, these formats are not optional—they are the only accessible versions of important service data.
117. In contrast, several major ISPs resist expanded accessibility obligations as follows.

## DWCC's Reply to the Telco Industry,

118. **TELUS, Rogers, Cogeco, Bell, Eastlink, and Quebecor** support WCAG compliance but argue that additional accessibility features—such as **ASL/LSQ videos**, braille, or tactile print—should be **offered on request only**. They cite low demand, high cost, and flexibility concerns
119. These providers also claim that existing frameworks like the **Accessible Canada Act (ACA)** and Internet Code already contain sufficient guidance, and that the Commission should **avoid duplicating obligations**.
120. **DWCC** categorically rejects these positions. Accessibility that is only available “upon request” is **not true accessibility**—it is **accommodation**, and accommodations often come with delays, denials, or degraded service. This approach is insufficient under both the **ACA** and the spirit of the CRTC's 2023 Policy Direction, which mandates the proactive removal of systemic barriers.
121. The telcos' assertion that there is “low demand” for accessible formats ignores the structural exclusion that has long kept DDBHH consumers out of these processes. **The demand is there—but the access is not**
122. **SSi Canada** supports WCAG compliance and recommends limited obligations for smaller providers, again citing cost and practicality in remote regions. **DWCC** disagrees. The Commission can allow flexible implementation

**without compromising accessibility standards.** Scalable solutions such as embedded video players, icon sets, and visual toolkits can be used by ISPs of all sizes.

## **DWCC's Concluding Position to Q5**

123. **DWCC** urges the Commission to go beyond machine-readability and adopt a **comprehensive, national accessibility standard** for broadband consumer labels. This must include the following features:

1. **ASL and LSQ video formats**, embedded alongside all visual and written label versions
2. **Plain language summaries** to support users with lower literacy or cognitive disabilities
3. **High-contrast visual layouts** with clear icons, not dependent on audio or fine print
4. **Screen reader compatibility**, tested against WCAG 2.2 Level AA
5. **Braille and large print formats**, available upon request—but promoted, not hidden
6. **Icons indicating compatibility with VRS, RTT, captioning, and video apps**
7. **Redundant delivery channels**, including email, downloadable files, printed handouts, and in-store kiosks.

124. These standards must be applied universally and enforced through periodic audits and compliance reports.

125. **DWCC** reiterates that accessibility cannot be optional, request-based, or left to the goodwill of individual providers. The Commission must mandate **proactive, consistent accessibility standards** that reflect the needs of Canadians with diverse communication modes—not just hearing, English-literate users.

126. Anything less would violate the **Accessible Canada Act**, undermine the intent of the 2023 Policy Direction, and perpetuate exclusion in one of Canada's most essential service sectors.

## **REPLY TO Q6**

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

## DWCC's Position and Overview

127. The **DWCC** strongly supports the mandatory disclosure of network performance and service quality metrics that reflect real-world user experiences, not just theoretical speeds. These metrics are especially critical for **DDBHH consumers**, whose ability to communicate in ASL/LSQ, use captioned services or access emergency platforms relies on stable, low-latency, and high-bandwidth connections.
128. **DWCC** recommends that all broadband consumer labels include **five core metrics**:
1. Peak Period Speeds (download/upload)
  2. Latency (Ping Time)
  3. Jitter
  4. Packet Loss
  5. Service Reliability/Uptime
129. Each metric must be clearly explained in plain language, supported by **visual icons**, and, wherever possible, presented in **ASL/LSQ video format** to enable full accessibility and comprehension.
130. Telecommunications services are not merely commercial products—they are essential communication tools, particularly for **DDBHH** users. These five metrics **determine whether the internet can reliably support video calls, relay services**, remote education, telehealth, and emergency access.

## DWCC's Reply to Consumer Groups

131. **DWCC** is aligned with several consumer and public interest organizations that support the inclusion of practical, experience-based network performance indicators:
132. The **CCTS** supports publishing **expected** rather than **advertised** metrics, noting that the gap between provider claims and actual performance is a major source of consumer complaints. **DWCC** agrees and emphasizes the need for **signed and visual formats** that clearly present this data.
133. **PIAC** urges that metrics reflect **typical user performance** and recommends clarity in technical definitions. **DWCC** supports PIAC's recommendation and adds that explanations must also be **linguistically accessible**, especially for DDBHH

and low-literacy consumers.

134. The **Competition Bureau** supports the inclusion of latency, real speeds, and other performance measures to enhance competitive transparency. **DWCC** highlights that for accessibility-reliant users, these metrics are **not optional—they are core usability indicators**.
135. **Union des consommateurs** supports the inclusion of real-world usability data (e.g., suitability for streaming, Zoom, or telehealth), which **DWCC** echoes as a needed framing tool for accessibility comprehension.
136. The **Manitoba Coalition (CAC)** recommends performance metrics aligned with everyday use and fairness in comparing providers—something **DWCC** supports, particularly for **underserved and rural communities**.
137. **Pavlović et al.** recommend an SSL (Satisfactory Service Level) framework that includes contextual performance visuals, which **DWCC** sees as a useful accessibility aid for decision-making.
138. **DWCC** agrees with these organizations that the inclusion of meaningful, consumer-friendly performance metrics is critical to ensuring **trust, usability, and equity** in the broadband market.

## **DWCC and Deaf Groups Response**

139. **CDGM, DHH Coalition, and DWCC** emphasize that latency, jitter, and packet loss directly impact video clarity, caption synchronization, and communication reliability—especially for VRS, RTT, and video interpretation users.
140. **DWCC** fully supports and aligns with the positions of CDGM and the DHH Coalition in emphasizing that **latency, jitter, and packet loss are critical performance metrics** that directly affect the **clarity of video communication, synchronization of captions, and overall reliability of real-time communication tools** such as **VRS, RTT, and video interpretation services**. For DDBHH consumers, these metrics are not technical abstractions—they have **direct implications on accessibility, safety, and equitable participation in digital communication**.

## DWCC's Reply to the Telco Industry

141. Several ISPs, including **Bell, TELUS, Cogeco, Eastlink, Quebecor, and Rogers**, oppose the inclusion of detailed metrics such as latency, jitter, or packet loss. Their arguments include that these metrics are “too technical” for most consumers to understand; such data varies widely depending on in-home equipment (e.g., Wi-Fi setup); and the inclusion of these details could lead to confusion or misinterpretation
142. **DWCC** fundamentally disagrees with these positions. **Technical complexity is not a valid reason to exclude critical accessibility data.** These metrics can and must be translated into plain language, visual charts, and contextual examples to ensure users understand what they mean. The **real issue is not confusion—it's exclusion.** Without these metrics, DDBHH consumers are forced to guess whether their connection can support video calling apps, Zoom captioning, or emergency video communication.
143. **SSi Canada** recommends flexible approaches for remote providers, citing that granular metrics may be difficult to collect or communicate in satellite or low-bandwidth contexts. **DWCC** maintains that while flexibility in reporting tools is acceptable, the **requirement to report accessibility-critical metrics must remain.**

## DWCC's Concluding Position to Q6

144. **DWCC** strongly recommends that the Commission require ISPs to disclose, on all broadband consumer labels, the following **five mandatory network performance metrics**:
1. Peak Period Download and Upload Speeds
  2. Latency (Ping Time)
  3. Jitter
  4. Packet Loss
  5. Service Reliability/Uptime
145. Peak period Download / Upload Speeds reflects real-world speeds during 7:00–11:00 PM local time, when most users—including DDBHH individuals—depend on the internet for communication and media. Latency is critical for real-time signing, VRS, telehealth, and live captions. Latency or Ping Time of over 100ms degrades ASL video quality and captioning sync. Jitter affects video and audio fluidity. High jitter causes distortion in signing clarity during calls. Packet loss results in missed video frames or dropped captions.

Loss over 1% significantly reduces comprehension for video-based communication. Service reliability disproportionately impacts DDBHH users who cannot fall back on voice calls. Labels must disclose service outages and average repair times.

146. These metrics must be displayed with visual and color-coded aids, presented in plain language, **available in ASL/LSQ video format** and published in a way that enables regional and plan-based comparison
147. Network performance is the backbone of **functional accessibility**. When latency spikes or packet loss occurs, DDBHH users are disconnected from society—not just their internet. The Commission must ensure that consumers can assess broadband plans based on what they can do, not just what they claim to be.
148. **DWCC** also recommends that the Commission provide guidance on measurement methodology (e.g., third-party tools like CIRA/SamKnows), and standardize definitions across ISPs for comparability. The Commission should also mandate regular updates to maintain accuracy and consumer trust.

## REPLY TO Q7

### Q7. What challenges do ISPs face in providing network performance and service quality metrics?

#### DWCC's Position and Overview

149. The DWCC acknowledges that ISPs may encounter operational or technical challenges when collecting, standardizing, and reporting network performance metrics. However, **DWCC** firmly asserts that these challenges must not be used to justify withholding critical information from consumers—especially those in **accessibility-dependent communities** such as DDBHH Canadians.
150. **DWCC** emphasizes that the core issue is not whether reporting metrics is difficult—it is whether consumers deserve truthful, **accessible**, and standardized performance data that empowers them to make informed service decisions. ISPs have had decades to refine performance measurement tools, and existing third-party validation methods are well-established in Canada (e.g., **CIRA**, **SamKnows**, **M-Lab**). The Commission must require that ISPs overcome these operational concerns through standardized protocols, consumer-centric disclosures, and transparent methodologies.

## DWCC's Reply to Consumer Groups

151. **DWCC** sees strong alignment among consumer organizations and public interest groups regarding addressing ISP challenges without compromising consumer access to performance data.
152. The **CCTS** affirms that mismatches between advertised and actual performance are a major source of complaints. **CCTS** urges disclosure of expected speeds and consistent measurement protocols as part of consumer protection and complaint prevention.
153. **PIAC** states that inconsistent, unverifiable, or vague performance metrics mislead consumers and undermine public trust. It recommends enforceable accuracy thresholds, performance audits, and independent testing partnerships—all of which **DWCC** supports.
154. The **Competition Bureau** acknowledges implementation complexity but warns that consumer choice is impaired when accurate and comparable data is unavailable. The Bureau encourages disclosures even when variability exists, as long as proper context is provided.
155. **Pavlović et al.** highlight that performance inconsistencies are often a result of **internal ISP training gaps**, not insurmountable technical limitations. They call for standardized public information tools and recommend consumer testing to confirm label usability.
156. **DWCC** agrees with these groups that **the burden of transparency cannot fall on the consumer**. It is the responsibility of providers to deliver data in a **reliable, accessible, and user-friendly manner**, regardless of internal complexity.

## DWCC and Deaf Groups Response

157. **DWCC**, **CDGM**, and **DHH Coalition** all argue that failure to provide performance data results in **systemic exclusion**. For DDBHH users, metrics like latency, jitter, and packet loss are **essential to determining whether video communication, captioning, and remote access tools will function properly**.

158. **DWCC** strongly agrees with **CDGM** and the **DHH Coalition** that withholding performance data such as latency, jitter, and packet loss leads to systemic exclusion of DDBHH users. For our communities, **these metrics are not optional—they are essential indicators of whether video communication, captioning, and remote access tools will work reliably**. The absence of this information prevents informed decision-making and reinforces existing accessibility gaps in the telecommunications marketplace.

### **DWCC's Reply to the Telco Industry**

159. **DWCC** acknowledges that ISPs—including **Bell, TELUS, Cogeco, Eastlink, Quebecor, and Rogers**—have raised several common challenges regarding the disclosure of performance metrics. These include concerns that performance metrics can vary due to external factors such as Wi-Fi interference, building materials, and distance from the router. ISPs also point out that infrastructure differs by region and technology type (e.g., fibre, cable, or fixed wireless), making standardization of measurement protocols across all networks and platforms complex and potentially burdensome. Additionally, some providers argue that reporting too much technical data could confuse consumers rather than assist them.
160. **DWCC** responds by asserting that these are implementation details, not barriers to compliance. While the variability of consumer environments is real, transparency must prevail. Providing performance ranges, explaining conditions for maximum performance, and using plain language **and visual summaries** can address these concerns without sacrificing disclosure.
161. ISPs already possess sophisticated internal analytics tools, and many already participate in third-party measurement partnerships. **DWCC** sees **no legitimate barrier** to disclosing performance data in a standardized **and accessible format—especially when essential services like VRS, RTT 911, and ASL/LSQ video calls are at stake**.
162. **SSi Canada** argues that detailed performance reporting is impractical for rural and satellite-based ISPs and could impose unsustainable burdens. While **DWCC** recognizes regional constraints, **this cannot justify withholding essential accessibility information**. Instead, smaller providers should be given support and flexibility in reporting tools, but not exemptions from their transparency obligations.

## DWCC's Concluding Position to Q7

163. **DWCC** urges the Commission to adopt the following **principles and recommendations** in response to the challenges raised by ISPs.

DWCC urges the Commission to adopt the following principles and recommendations in response to the challenges raised by ISPs. First, **transparency must take precedence over complexity**, and ISP challenges should not justify the absence of performance disclosures. Second, standardized measurement protocols, such as those based on CIRA or SamKnows, must be adopted and required on a national level. While ISPs may provide contextual explanations and performance ranges, these must be **clearly defined and accessible**. Labels should also include plain-language definitions, visual indicators, and **signed language video explanations** for key metrics such as **latency, jitter, and packet loss**. Additionally, regional performance differences and variability should be acknowledged in the label rather than hidden or ignored. Finally, ISPs unable to implement in-house solutions should be required to use third-party validated tools and report performance accordingly.

164. **DWCC** concludes that **performance reporting is not a burden—it is a public obligation**. Especially for DDBHH users, the absence of real performance data is more than an inconvenience—it is a barrier to communication, access, and safety. By requiring ISPs to report performance metrics in a clear and accessible manner, the Commission will not only protect consumers but also fulfill its obligations under the **Accessible Canada Act** and the 2023 Policy Direction.

## REPLY TO Q8

**Q8. Should standardized information on network performance and service quality account for variations based on urban, rural, remote, and regional differences?**

### DWCC's Position and Overview

165. The **DWCC** strongly supports requiring ISPs to account for regional, urban, rural, and remote variations in their standardized broadband consumer labels. Canada's geography produces profound differences in network performance, infrastructure availability, and access to real-time communication tools. These disparities are particularly acute for **DDBHH** consumers who depend on reliable internet for **video calling, captioned communication, and emergency services**.

166. A single national average—or one-size-fits-all disclosure—masks the realities consumers face in underserved or hard-to-reach areas. Without disaggregated data, consumers are left to guess whether a service advertised as “fast” or “reliable” can truly support essential communication tools in their location. This erodes trust, undermines accessibility, and perpetuates systemic exclusion.
167. **DWCC** affirms regional transparency is a critical equity issue and must be embedded in the Commission’s labelling requirements.

### **DWCC’s Reply to Consumer Groups**

168. **DWCC** aligns with a broad consensus of public interest and consumer advocacy organizations who agree that regional performance differentiation is essential for transparency and fairness.
169. The **Competition Bureau** recommends regional performance reporting as a tool to reduce information asymmetry. It emphasizes that accurate comparisons must reflect where the service is being delivered—not just national averages.
170. The **CCTS** notes that many consumer complaints stem from mismatches between advertised performance and actual regional service levels, reinforcing the need for location-based disclosures.
171. **PIAC** strongly supports breaking down metrics by region, arguing that broad national data hides meaningful differences in quality and access, particularly in underserved and marginalized communities.
172. The **Manitoba Coalition**, **Option consommateurs**, and **Union des consommateurs** also support regional data disclosure to **empower rural users** and improve market accountability. **DWCC** agrees and adds that this data is especially needed for DDBHH consumers in remote and Indigenous communities.
173. **Pavlović et al.** call for disaggregated, regional data as a means to **map inequities**, evaluate market failures, and direct policy interventions more effectively. **DWCC** fully supports this view.
174. **DWCC** agrees with these organizations that consumers have a **right to know** how their region’s connectivity compares to national or provider-wide claims—especially when those claims impact accessibility and safety.

## DWCC and Deaf Groups Response

175. **DWCC** strongly agrees with the positions of the **DHH Coalition** and **CDGM** that regional performance metrics are **essential for ensuring accessibility** for DDBHH users. Labels that omit location-specific data are inaccessible by default. Without this information, users are left to assume service viability, which can jeopardize their ability to access crucial services such as video Zoom captions, VRS, or RTT 911. **Labels that omit location-specific data are inherently inaccessible, as they prevent DDBHH consumers from making informed decisions about their service options.**

## DWCC's Reply to the Telco Industry

176. Several large ISPs—including **Bell, Cogeco, Eastlink, Quebecor, TELUS,** and **Rogers** appear to collectively oppose mandatory region-specific reporting. These ISPs argue that regional breakdowns are overly complex due to diverse technology platforms and variable infrastructure across different areas. Moreover, these providers contend that such granular data might potentially confuse consumers or create unrealistic expectations about service performance. As an alternative, they prefer publishing a **single national benchmark** with generalized disclaimers that acknowledge potential regional variations.
177. **DWCC** firmly rejects these arguments. Complexity is not an excuse to obscure reality. Consumers—especially those in rural or remote areas—**already experience inconsistent service**; what they lack is **clarity and proof**. General disclaimers do not meet the standard of transparency or functional equivalency.
178. **DWCC** emphasizes that the harm caused by unclear, average-based labels far outweighs the administrative cost of reporting by region. National data that hides regional underperformance is a barrier to informed consent—**especially for DDBHH consumers who depend on stable video communication and high-quality streaming.**
179. **SSi Canada** raises concerns about the feasibility of detailed regional reporting in sparsely populated or satellite-dependent regions. **DWCC** acknowledges the operational challenges but maintains that basic regional transparency is still necessary. The Commission can define reasonable geographic zones (e.g., postal code groupings, service areas) and allow ISPs to use ranges or tiers without compromising the core principle of accessibility.

## DWCC's Concluding Position to Q8

180. **DWCC** urges the Commission to require ISPs to report **standardized network performance and service quality metrics** by region, using defined and scalable geographic groupings.

181. Specifically, **DWCC** recommends that:

1. **ISPs report regional data** broken down by:

- Urban, rural, remote, and northern zones
- Technology type (e.g., fibre, cable, DSL, fixed wireless, satellite)
- Postal code or CRTC-defined service areas

2. **Labels clearly display performance variation** with visual tools (e.g., heat maps, icon ratings, or drop-down selectors by location).

3. All regional performance data be:

- Presented in **plain language**
- Accessible in **ASL/LSQ**
- Available through both provider websites and a **centralized CRTC platform**

4. The Commission publish an **interactive**, bilingual, and **accessible national database** that allows consumers to compare performance metrics by region and provider, supported by video guides and plain language summaries.

182. **DWCC** stresses that regional reporting is not a “nice to have”—it is a **requirement for digital equity**. Without it, DDBHH users in underserved regions will remain invisible, unprotected, and disconnected.

183. The Commission must ensure that broadband labels reflect not just what a service promises in theory—but what it delivers in practice, where people actually live. Only then will consumers be able to make informed, accessible, and equitable decisions.

## REPLY TO Q9

**Q9. If network performance and service quality are measured over a peak usage period, how should that period be defined?**

## DWCC's Position and Overview

184. The **DWCC** strongly recommends that the Commission define a national peak usage period as 7:00 PM to 11:00 PM local time, Monday through Friday, across all ISPs and regions in Canada. This evening window reflects the **actual time of highest network demand** for most residential consumers and is consistent with international best practices (e.g., FCC in the U.S., Ofcom in the U.K., ACCC in Australia).
185. This period is also when **Deaf, Deaf-Blind, and Hard of Hearing (DDBHH) users** most frequently depend on internet access for **video calls, VRS, video calling apps, captioned streaming**, group chats, and telehealth or education platforms. Performance during this window is **not optional—it defines accessibility**.
186. Allowing each ISP to define its own peak period would lead to inconsistency, non-comparability, and potential manipulation of performance data. **DWCC** emphasizes that a clear, standardized definition is essential for transparency, consumer trust, and regulatory oversight.

## DWCC's Reply to Consumer Groups

187. **DWCC** acknowledges that many consumer and public interest groups have expressed support for establishing a **universal evening peak period** aligned with actual usage patterns:
188. The **CCTS, Competition Bureau, PIAC, Union des consommateurs**, and **Manitoba Coalition** all support defining peak hours as **7 PM to 11 PM**, citing alignment with household internet usage and consistency with global measurement norms.
189. **Pavlović et al.** emphasize that a shared national definition prevents misleading comparisons and creates accountability. **DWCC** fully supports this, particularly when data is used to assess accessibility viability for communication-based services.

## DWCC and Deaf Groups Response

190. **CDGM, DHH Coalition, DWCC**, as well as the **City of Calgary**, stress that **evening is the time** when DDBHH and equity-seeking communities rely most heavily on the internet. It is the time when users access:

- ASL/LSQ video chats with family
- Remote meetings or learning
- Emergency alerts or group calls
- Captioned content

191. **DWCC** agrees with these stakeholders that defining peak usage as the **evening residential window** ensures that performance metrics reflect real consumer experiences—not ISP-optimized marketing data.

### **DWCC’s Reply to the Telco Industry**

192. ISPs including **Bell, TELUS, Cogeco, Eastlink, Quebecor, and Rogers** acknowledge that 7–11 PM is a commonly recognized busy period. However, they argue that peak periods vary by customer type (e.g., business users), different technologies may have different congestion patterns, ISPs should have flexibility to define peak periods per product line or market segment.

193. **DWCC** rejects these arguments as **inconsistent with accessibility, transparency, and comparability**. Allowing each ISP to self-define peak usage would obscure real-world performance; undermine trust in published metrics; make provider comparisons meaningless; and disadvantage consumers who depend on stable, time-sensitive access, such as VRS or live captioning.

194. **SSi Canada** raises concerns that seasonal or geographic variability (especially in remote or satellite-based systems) might necessitate flexible peak definitions. **DWCC** recognizes regional infrastructure differences but maintains that consumers need a fixed benchmark to evaluate whether their internet will work when they actually use it most.

195. If additional peak periods are needed (e.g., business-hour peaks for enterprise plans), they can be reported as supplemental data—not as replacements for the standardized residential peak window.

### **DWCC’s Concluding Position to Q9**

196. **DWCC** urges the Commission to define peak usage nationally as: **7:00 PM – 11:00 PM local time, Monday through Friday**

197. This standardized definition ensures that performance metrics reflect the period during which most Canadians use the internet at home; DDBHH users access communication tools most heavily and network congestion impacts

real-time accessibility services.

198. **DWCC** further recommends that:

1. All ISPs measure and report key performance metrics (speed, latency, jitter, packet loss) during this defined window.
2. Performance data can be collected using wired or validated conditions to ensure consistency.
3. Labels include plain language and **visual explanations** of peak performance, accompanied by **ASL/LSQ video summaries**.
4. Supplemental metrics (e.g., daytime business usage) may be disclosed in addition to—but not in place of—this standardized evening period.

199. The peak usage window is not arbitrary—it is **central to digital inclusion**. If performance drops during the hours when consumers rely most on access, then the service fails its purpose. **DWCC** calls on the Commission to ensure that all performance measurements are anchored to the time that **matters most to Canadians**.

## REPLY TO Q10

**Q10. Are there approaches that have been taken in other countries that might be appropriate in Canada? If so, which country's approach and which metric(s) do you think the Commission should pursue?**

### **DWCC's Position and Overview**

200. The **DWCC** strongly supports the adaptation of international broadband labelling frameworks—particularly from the United States (FCC), United Kingdom (Ofcom), European Union (EU), and Australia (ACCC)—but with significant enhancements tailored to Canada's legal, linguistic, and **accessibility landscape**.

201. **DWCC** recommends that Canada adopt and improve upon these models by integrating plain language, visual design, **accessibility-first formatting, and signed language delivery (ASL/LSQ)**. International precedents provide a solid foundation—but Canada must lead by example in ensuring **functional equivalency** for **DDBHH** consumers.

202. This proceeding provides an opportunity to create a Canadian Broadband Label Standard that reflects the obligations of the Accessible Canada Act, the requirements of the 2023 Policy Direction, the **principles of digital equity**, transparency, and universal design.

### **DWCC's Reply to Consumer Groups**

203. **DWCC** aligns closely with consumer and advocacy organizations that recommend adapting global best practices to Canada's regulatory environment.
204. The **Competition Bureau** endorses the FCC's broadband "nutrition label" as a model for standardization, transparency, and consumer empowerment. **DWCC** agrees, especially with its format that includes pricing, speed, contract terms, and complaint pathways.
205. The **CCTS** supports adapting international examples (e.g., FCC and ACCC) to align with Canadian complaints data and consumer confusion trends. **DWCC** concurs that these models—if localized and **accessible**—can significantly improve clarity.
206. **PIAC** recommends building a "made-for-Canada" label that draws from U.S. and EU visual formats, while also incorporating real-world usability examples. **DWCC** supports this recommendation and calls for the addition of **signed language, visual contrast, and plain language summaries**.
207. **Pavlović et al.** propose an **SSL (Satisfactory Service Level)** framework based on international precedents, enhanced with visual indicators and consumer-facing performance benchmarks. **DWCC** supports this approach, especially for use by **accessibility-focused consumers who rely on service stability and reliability**.

### **DWCC and Deaf Groups Response**

208. **DWCC** fully supports the position of **CDGM** and the **DHH Coalition, as well as the City of Calgary, Manitoba Coalition, and Union des consommateurs**, in calling for the integration of global benchmarks with strong Canadian accessibility standards. **DWCC** emphasizes that any adopted framework must reflect **Canada's bilingual context, ensure signed language representation**, and address the specific needs of Indigenous and rural consumers.

209. **DWCC** strongly agrees with these groups that international models may be useful starting points but Canada must look outward for structural guidance—but look inward for cultural, linguistic, and accessibility integration with the regional realities of Canadian DDBHH communities.

### **DWCC’s Reply to the Telco Industry**

210. Major ISPs—including **Bell, TELUS, Cogeco, Eastlink, Quebecor,** and **Rogers**—are largely opposed to adopting international models. Their arguments include where the FCC model is “too regulatory” and inconsistent with Canada’s market structure; Canadian ISPs are already governed by the Internet Code, making a U.S.-style label redundant, and mandatory disclosure frameworks from other countries are too rigid and incompatible with Canadian provider diversity.
211. **DWCC** respectfully rejects these arguments. The FCC, Ofcom, and ACCC frameworks are not inflexible blueprints—they are principled foundations built on transparency, consumer protection, and accessibility. Canada’s own legislative and policy environment requires similar standards, particularly under the **Accessible Canada Act** and the CRTC’s public interest mandate.
212. **SSi Canada** expresses concern about the scalability of global models to remote or satellite-based systems. **DWCC** acknowledges this but believes that simplified versions of the Canadian label can still be deployed, provided that accessibility and usability are preserved. No provider should be exempt from delivering transparent and accessible service information, regardless of location.

### **DWCC’s Concluding Position to Q10**

213. **DWCC** recommends that the Commission **build a Canadian broadband label** that draws from the best aspects of international models, while addressing the unique needs of Canadian consumers. **DWCC** recommends the following integrations from various international examples as follows:

#### **214. From the FCC (United States):**

- “Nutrition-style” label format with:
- Download/upload speeds
- Latency and packet loss
- Pricing, discounts, and fees
- Contract length and cancellation
- Complaint channels

- Machine-readable and human-readable versions
- Mandatory implementation across all ISPs

**215. From the European Union:**

- Disclosure of typical, not just advertised, speeds
- **Usage examples (e.g., suitable for video calls, streaming, gaming)**
- Emphasis on data transparency and comparability

**216. From the ACCC (Australia):**

- Busy-hour speed metrics
- Plain-language explanations of expected performance
- Recognition of **cognitive accessibility** and interface simplicity

**217. From Ofcom (UK):**

- Required disclosure of speeds achievable by **50%+ of users**
- Emphasis on eliminating misleading advertising claims
- Guidance on consumer information hubs and performance guarantees

**218. Canadian Enhancements that DWCC urges:**

1. **ASL/LSQ video versions** of all label content
2. **Plain language summaries** across all platforms
3. **Visual-first layouts** with high-contrast and intuitive iconography
4. **Braille and large-print options available upon request**
5. Labels embedded into Critical Information Summaries, websites, and retail settings
6. Labels adapted for urban, rural, remote, and Indigenous contexts
7. Accessible through a centralized CRTC public platform

**219. DWCC further recommends that the Commission **consult DDBHH users, disability organizations, and usability experts** to co-design the label format and content. Lived experience must guide design.**

**220. Canada has the tools—and the obligation—to lead. In conclusion, DWCC urges the Commission to lead globally by creating a Canadian broadband label standard that is:**

- Informed by international practice
- **Built on accessibility and equity**
- **Designed for visual, signed, and multilingual access**

- Adaptable across infrastructure and provider types

## REPLY TO Q11

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

### DWCC's Position and Overview

221. The DWCC strongly supports the implementation of a standardized, national methodology for measuring network performance metrics across all ISPs. Without a consistent measurement framework, comparisons across providers become meaningless, misleading, or even manipulative—particularly for **DDBHH consumers**, who depend on reliable, high-performance connections for **video-based communication, VRS, captioning, and emergency access**.

222. **DWCC** maintains that a shared national testing standard is essential to ensure:

- Consumer confidence
- Transparency in performance claims
- Comparability across ISPs and plans
- **Equitable access to essential services**

223. This standard must be applied universally and include performance metrics like peak period speeds, latency, jitter, packet loss, and uptime. Testing conditions, data collection intervals, and validation procedures must be public, replicable, and independently auditable.

### DWCC's Reply to Consumer Groups

224. **DWCC** is aligned with multiple consumer advocacy organizations that emphasize the need for uniform, transparent, and enforceable methodologies in performance testing.

225. The **Competition Bureau** argues for a nationally consistent methodology that improves market transparency and empowers consumer choice. **DWCC** agrees that differing measurement tools and definitions currently obscure comparability and consumer understanding.

226. The **CCTS** emphasizes that many consumer complaints arise from unverifiable or inconsistent performance claims. A uniform methodology would

help resolve disputes and reduce reliance on anecdotal or misleading data.

227. **PIAC** recommends the use of **third-party tools** such as **SamKnows** or **CIRA**, as well as cross-industry standards to validate ISP claims. **DWCC** fully supports independent testing, especially to ensure that metrics affecting accessibility (e.g., jitter, latency) are accurate and enforceable.
228. **Pavlović et al.**, along with the **City of Calgary**, **Union des consommateurs**, and other groups, support the development of shared protocols, stating that a fragmented approach undermines both competition and consumer trust. **DWCC** concurs and emphasizes that **users with accessibility needs** require reliable and consistent performance data to determine whether a plan is functionally equivalent to others.

### **DWCC and Deaf Groups Response**

229. **CDGM**, **DHH Coalition**, and **DWCC** all call for the methodology to be developed in consultation with the accessibility community to ensure that **testing reflects real-world conditions experienced by DDBHH users**.
230. **DWCC** agrees with these organizations that consistency in measurement is essential for consumer protection, **accessibility enforcement**, and **equitable digital participation**.

### **DWCC's Reply to the Telco Industry**

231. Large ISPs—including **Bell**, **Rogers**, **TELUS**, **Eastlink**, **Cogeco**, and **Quebecor**—express opposition to mandatory uniform methodologies, arguing that ISPs argue that networks differ in architecture—for example, fibre, DSL, cable, or fixed wireless—and that a single methodology may not account for regional and technological differences. As such, they contend that providers should retain the flexibility to define and report their own performance metrics.
232. **DWCC** disagrees with these positions. While infrastructure differences exist, they do not justify using non-comparable testing methodologies that confuse or mislead consumers. ISPs should still be required to measure core metrics (speed, latency, jitter, etc.) using a shared testing standard—even if results are contextualized per technology or geography.
233. Allowing each ISP to define its own methodology risks enabling inflated or selectively measured results, “gaming” of peak performance windows, and misleading disclosures for DDBHH consumers who rely on precise,

time-sensitive performance.

234. **SSi Canada** expresses concern that a “one-size-fits-all” approach might not suit satellite or rural providers. **DWCC** acknowledges this but proposes a **core national baseline** with **contextual flexibility** (e.g., optional supplemental notes or technology-specific ranges) to ensure equity without erasing accessibility.

### **DWCC’s Concluding Position to Q11**

235. **DWCC** urges the Commission to require that all ISPs:

1. Adopt a standardized national testing methodology, based on third-party validated tools (e.g., CIRA, SamKnows).
2. Measure and disclose the same core metrics (speed, latency, jitter, packet loss, uptime) across all technologies and regions.
3. Publish testing conditions, including:
  - Type of connection (wired/wireless)
  - Peak time parameters
  - Hardware environment
  - Data collection intervals
4. Present all results in:
  - **Plain language summaries**
  - **Visual formats** (e.g., charts, icons)
  - **ASL/LSQ video versions**
  - **Accessible downloads (HTML, tagged PDF)**
5. Allow for complementary, ISP-specific data as supplemental content—but never as a substitute for standardized metrics.

236. **DWCC** emphasizes that transparency without consistency is not transparency. Canadians—**especially those with communication accessibility needs**—must be able to assess and compare broadband services on equal footing. A universal measurement methodology is the foundation of meaningful broadband labelling, regulatory compliance, and public trust.

### **REPLY TO Q12**

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

## DWCC's Position and Overview

237. The DWCC strongly supports the requirement that broadband performance measurements be disaggregated by geographic region—including urban, rural, remote, and northern areas. National averages alone obscure the **real and persistent service gaps** experienced by **Deaf, Deaf-Blind, and Hard of Hearing (DDBHH)** consumers, particularly those living in underserved regions.
238. For **accessibility-dependent users**, location-specific performance data is not optional—it is foundational to informed consent and service suitability. The Commission must ensure that metrics such as speed, latency, jitter, and reliability are reported in a manner that reflects regional realities, not just provider-wide claims.
239. **DWCC** asserts that disaggregated measurement:
- Enables meaningful comparisons
  - Empowers rural and remote consumers
  - Reveals service disparities
  - **Supports targeted accessibility planning and investment**
240. Without it, consumers in equity-seeking regions are left behind—forced to guess whether their internet service can support essential communications like **video calls, VRS, captioned content, or emergency access**.

## DWCC's Reply to Consumer Groups

241. **DWCC** aligns with multiple public interest organizations who have called for **region-specific performance disclosures** to enhance transparency and accountability:
242. **PIAC, Competition Bureau, and CCTS** all support disaggregated reporting as a way to highlight regional inequalities and build consumer trust. **DWCC** agrees that national averages **fail to tell the full story** and disproportionately benefit urban providers.
243. **Union des consommateurs, Manitoba Coalition**, and others argue that regional data is key to identifying **policy and funding gaps**. **DWCC** notes that this is especially relevant for **telecom accessibility initiatives** in Indigenous, northern, and remote communities.

244. **Pavlović et al.** recommend performance mapping tools and regional performance scorecards, which **DWCC** supports—especially if these tools are made **bilingual, accessible, and interactive**.
245. **DWCC** echoes these stakeholders in asserting that **geography matters**—and that accurate, accessible performance reporting must reflect this reality.

### **DWCC and Deaf Groups Response**

246. The **DHH Coalition**, and **CDGM**, emphasize that **performance variation is a direct accessibility issue**. DDBHH users need to know whether their location can reliably support video calling apps, Zoom, RTT, or captioned streaming—not whether someone in a large urban centre has strong service.
247. **DWCC's position is that performance variation is fundamentally an accessibility issue**. DDBHH consumers must have access to accurate, location-specific performance data to determine whether their internet service can **reliably support essential communication tools such as video calling apps**, Zoom, RTT, and captioned streaming. It is not sufficient to rely on generalized performance data from large urban centres that may not reflect the lived experience of users in other regions.

### **DWCC's Reply to the Telco Industry**

248. Several major ISPs, including **TELUS, Bell, Cogeco, Quebecor, Rogers, and Eastlink**, argue against region-by-region reporting. They claim that it is technically complex and operationally burdensome, that performance varies significantly due to uncontrollable factors such as geography, weather, or infrastructure age, and that regional data might confuse consumers or lead to unfair comparisons.
249. **DWCC** disagrees with these arguments. While infrastructure and environmental variables are real, they do not justify the **withholding of accurate information**. On the contrary, consumers—especially DDBHH users—**need clarity to evaluate whether a service can support essential tools like video calls, remote education, and telehealth**.

250. Label disclosures can—and should—include:

- Ranges or expected values

- Contextual explanations
- Regional overlays and maps

251. These can be presented in **plain language, visual formats, and ASL/LSQ video** to reduce confusion—not cause it.

252. **SSi Canada** warns that regional testing may be impractical in low-density or satellite-served areas. **DWCC** acknowledges the difficulty of hyper-localized testing in remote communities but maintains that broad regional groupings (e.g., postal code clusters, CRTC-defined zones) can still offer useful transparency without imposing excessive burden.

253. If smaller ISPs cannot provide precise data, they should at minimum offer clear service disclaimers, disclose performance expectations by region and technology type, and participate in third-party or collaborative measurement initiatives.

## **DWCC's Concluding Position to Q12**

254. **DWCC** urges the Commission to require that performance data be broken down by geographic region in all broadband labels and public reporting. This must include:

1. Urban, rural, remote, and northern classifications, using:
  - CRTC service zones
  - Postal code groupings
  - Provider-defined regions, subject to Commission approval
2. Technology-specific data, indicating whether service is provided via:
  - Fibre, cable, DSL, fixed wireless, or satellite
3. Clear regional disclosure on all labels, including
  - Typical performance metrics
  - Known service limitations
  - Visual and plain language indicators
  - ASL/LSQ video summaries for DDBHH access
4. Creation of a centralized, bilingual, and accessible national performance map maintained by the Commission, which allows consumers to:

- Search by postal code or provider
- Compare regional results
- Understand accessibility viability

5. Mandatory inclusion of regional data in:

- Contracts and Critical Information Summaries (CIS)
- Provider websites and customer portals
- Broadband comparison tools

255. **DWCC** emphasizes that regional transparency is not a regulatory luxury—it is an **accessibility necessity**. Without it, DDBHH users, Indigenous communities, rural families, and low-income households are denied their right to **equal access, informed choice, and digital participation**.

256. The Commission must act to ensure that performance labels reflect **not just what a provider offers—but where, and to whom**. Geographic equity is a cornerstone of digital justice.

## REPLY TO Q13

**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?**

### DWCC's Position and Overview

257. The **DWCC** recommends a hybrid, **accessibility-centered testing approach** that incorporates software-based testing using standardized, third-party validated tools such as CIRA, SamKnows, or M-Lab; hardware-based testing where applicable, including in controlled lab environments or at points of network congestion; and optional ISP-developed public tools, but only if these are open source, independently audited, and fully accessible.

258. No single testing method alone can capture the diversity of real-world network performance across Canada's urban, rural, remote, and accessibility-reliant populations. A multi-pronged approach ensures accuracy, accountability, and consumer empowerment.

259. Critically, any tool made public—whether software or hardware-based—must be designed for **accessibility**. For **Deaf, Deaf-Blind, and Hard of Hearing**

**(DDBHH) users**, this means the **inclusion of ASL/LSQ video instructions, visual-first interfaces, and compatibility with screen readers, high-contrast modes, and alternative input methods.**

### **DWCC's Reply to Consumer Groups**

260. **DWCC** is aligned with consumer advocacy organizations who support **combining multiple methodologies** for performance testing, while maintaining transparency and independence:
261. **PIAC, CIRA, Pavlović et al., and CCTS** all endorse a **hybrid approach** that integrates software-based testing with independent audits and user validation. **DWCC** supports this recommendation, especially to reflect conditions experienced by DDBHH and low-bandwidth communities.
262. These groups emphasize that no single method is sufficient. Software-based tools provide scale and real-time insights, while hardware-based testing offers verifiable benchmarks. Combined, they promote accuracy of claims, comparability across providers, and public trust.
263. **DWCC** further recommends that if ISPs develop their own testing tools, they must be open source, **accessible in ASL/LSQ**, and subject to external validation and compliance audits.

### **DWCC and Deaf Groups Response**

264. **CDGM, the DHH Coalition, and the City of Calgary** stress that user-friendly testing tools must include **accessibility overlays, explanatory visuals, and signed language versions**. This is essential to ensure that all consumers—not just digital experts—can interpret and use performance results.
265. **DWCC** fully supports this position and aligns with the view that **accessibility features** must be embedded into testing tools by design. These features are not enhancements—they are essential components that ensure **DDBHH users** and others with **accessibility needs** can independently assess the reliability and suitability of internet services.

### **DWCC's Reply to the Telco Industry**

266. Telecom industry stakeholders including **Bell, Rogers, TELUS, Cogeco, Quebecor, and Eastlink** generally prefer internal flexibility. They argue that

existing network telemetry is sufficient for measuring performance, that external tools do not reflect infrastructure-specific realities, and that hardware-based testing is costly and may not reflect typical consumer experience. They also contend that providers should retain the right to develop their own tools and decide which data to share.

267. **DWCC** disagrees with the notion that internal tools alone are sufficient or that ISPs should retain full discretion over testing methods. This approach leads to non-standardized results, selective reporting, and ultimately, consumer mistrust.

268. **DWCC** emphasizes that transparency requires external verification. ISP-developed tools must be open to public scrutiny, subject to common standards, and developed with **universal accessibility features**.

269. **SSi Canada** suggests that prescriptive testing may not work for satellite and remote contexts. **DWCC** recognizes this concern but maintains that software-based testing platforms can accommodate network-type-specific variations while still adhering to core standards.

### **DWCC's Concluding Position to Q13**

270. **DWCC** urges the Commission to mandate a **hybrid testing model** that combines:

1. **Software-based testing**, conducted continuously using third-party validated platforms such as:

- CIRA's Internet Performance Test
- SamKnows
- M-Lab

2. **Hardware-based testing**, conducted at ISP network nodes or retail service points, for baseline calibration

3. **Public-facing ISP apps or portals**, only if:

- They are WCAG-compliant
- Provide **ASL/LSQ video navigation**
- Are open source and independently audited
- Display metrics in **plain language and visual formats**

271. **DWCC** further recommends that ISPs be required to submit periodic testing results in standardized formats, that consumers be given access to these results in multiple accessible formats—including **signed language videos**—and that the Commission maintain a central repository of verified performance data for public comparison.:
272. Testing tools must be **accessible, transparent, and inclusive**. For **DDBHH users**, performance data that cannot be independently verified, visually interpreted, or explained in signed language is functionally inaccessible.
273. The Commission must ensure that all testing—regardless of methodology—**serves the public interest and upholds accessibility rights** under the **Accessible Canada Act** and the **2023 Policy Direction**.

## REPLY TO Q14

### Q14. How are maximum download and upload speeds measured?

#### DWCC's Position and Overview

274. The DWCC asserts that maximum download and upload speeds must be measured using standardized, transparent, and verifiable methods that are consistent across all ISPs and regions. Maximum speeds are often cited in marketing and on service agreements—but without clarity on how they are measured, these figures can mislead consumers, especially **Deaf, Deaf-Blind, and Hard of Hearing (DDBHH)** individuals who rely on consistent high-speed access for **video calling, captioned content, and emergency communication**.
275. **DWCC** emphasizes that “**maximum**” **speeds** represent a best-case scenario under ideal network conditions and are not reflective of actual day-to-day experience. These figures must be clearly defined, accompanied by “typical” or “real-world” performance metrics, measured under controlled, standardized conditions, and presented with **plain language, visual aids, and ASL/LSQ video explanations**.

## DWCC's Reply to Consumer Groups

276. **DWCC** is aligned with several consumer advocacy organizations that call for transparent, contextualized reporting of maximum speeds:
277. **PIAC**, **CCTS**, **Union des consommateurs**, and the **Competition Bureau** all recommend that maximum speed disclosures be measured using standardized methodologies, presented alongside typical or average speeds, and explained with plain language and real-world context.
278. **Pavlović et al.**, along with the **City of Calgary**, emphasize that consumers often misinterpret “up to” speeds as guaranteed performance. They recommend that ISPs be required to clarify the conditions under which maximum speeds are achievable and the likelihood of users experiencing those speeds in everyday use.
279. **DWCC** supports these groups' recommendations and stresses that **clarity in speed reporting is an accessibility right**, not just a matter of consumer protection.

## DWCC and Deaf Groups Response

280. The **DHH Coalition**, **CDGM**, and **DWCC** argue that “maximum speed” claims must be translated into formats that are **accessible to users who rely on visual language**, such as **ASL/LSQ**. A static number alone provides **no meaningful information** if it cannot be interpreted or contextualized.

## DWCC's Reply to the Telco Industry

281. ISPs, including **Bell**, **Rogers**, **TELUS**, **Cogeco**, **Quebecor**, and **Eastlink**, acknowledge that maximum speeds are theoretical, but argue that they are useful for marketing and tier differentiation, achievable under ideal lab conditions, and dependent on numerous variables such as distance from node, router quality, and network load.
282. These ISPs prefer to retain flexibility in how they define and report maximum speeds and caution against overregulation.

283. **DWCC** challenges this position. Without a standardized measurement protocol, ISPs may report inflated figures that are not functionally relevant to consumers—especially those relying on stable, high-quality internet for **accessibility purposes**.

284. Maximum speed claims that are not contextualized undermine consumer trust, confuse DDBHH users who rely on real-time video communication, and disadvantage rural and low-income consumers who may interpret “up to” as a promise rather than a possibility.

285. **SSi Canada** SSi Canada cautions that in satellite systems, maximum speeds vary due to atmospheric and technical factors. **DWCC** recognizes this but emphasizes that providers should still disclose the methodology, including the time of testing, network conditions, and hardware used.

### **DWCC’s Concluding Position to Q14**

286. **DWCC** calls on the Commission to mandate that ISPs:

1. **Standardize the measurement of maximum speeds**, using:

- Controlled testing environments
- Wired connections where applicable
- Nationally agreed-upon methodologies (e.g., CIRA, SamKnows)

2. **Disclose the following** with every maximum speed figure:

- Testing conditions (e.g., device type, time of day)
- Whether the speed is achievable at the point-of-sale address
- Whether the consumer is likely to experience those speeds regularly

3. **Present maximum speed information alongside:**

- **Typical speeds** during peak hours
- **Minimum guaranteed speeds**, if available
- Real-world use examples (e.g., “suitable for 4 video calls,” “may not support HD streaming”)

4. Ensure that speed disclosures are:

- Delivered in **plain language**
- Accompanied by **visual indicators or infographics**

- Available in **ASL/LSQ video format, screen-reader compatible HTML, and printable versions**

5. Educate consumers through:

- Interactive online tools that explain the difference between maximum and typical speeds
- **Bilingual and accessible guides** at the point of sale

287. **DWCC** emphasizes that **maximum speed data, without context, is inaccessible**. For DDBHH users, misleading or inflated performance claims can mean the **difference between connectivity and isolation**.

288. The Commission must ensure that all speed metrics—especially those used in marketing and contracts—are truthful, verifiable, **and accessible to everyone**.

## REPLY TO Q15

**Q15. What methodologies do ISPs currently use to measure the network performance metrics listed below?**

- Maximum speeds
- Average speeds
- Typical speeds
- Latency
- Jitter
- Any other metrics that consumers may find relevant

## DWCC's Position and Overview

289. The DWCC asserts that the methodologies used by ISPs to measure network performance metrics must be publicly disclosed, standardized, and validated through independent tools or processes. Without this transparency, consumers—particularly **Deaf, Deaf-Blind, and Hard of Hearing (DDBHH)** users—cannot rely on performance claims when choosing a service that meets their communication and accessibility needs.

290. Currently, there is wide variation in how ISPs define, collect, and present these metrics, leading to confusion and non-comparability. This inconsistency particularly harms accessibility-focused users, who depend on accurate metrics for **video calls app, VRS, RTT, captioning, and real-time digital**

**communication.**

291. **DWCC** emphasizes that consumers have a right to know how performance is measured, that providers must clearly distinguish between lab-based maximums and real-world performance, and that testing must reflect peak usage conditions and typical consumer experiences.

### **DWCC's Reply to Consumer Groups**

292. **DWCC** is aligned with consumer organizations calling for full public disclosure and standardization of performance measurement methodologies:
293. **PIAC, Pavlović et al., CCTS, Union des consommateurs, and the City of Calgary** support requiring ISPs to publish the test tools used, network conditions, frequency and timing of tests, and the method of calculating each performance metric.
294. **DWCC** adds that methodologies must be understandable, not buried in technical appendices. Clarity must be delivered through **plain language, visual aids, and signed language formats**, so that DDBHH users can interpret and apply the information equitably.
295. Together, these organizations call for a regulatory approach that places accountability and **accessibility at the forefront of performance disclosure.**

### **DWCC and Deaf Groups Response**

296. **The DHH Coalition and CDGM** emphasize that for DDBHH users, vague or misleading metrics can result in purchasing plans that fail to support core **accessibility needs**. This includes services like **video calling apps and Zoom video conversations, VRS interpreting, real-time captioned streaming, and emergency RTT communication.**
297. **DWCC** fully supports this position and adds that methodologies must be understandable—not buried in technical appendices. Clarity must be delivered through **plain language, visual aids, and signed language formats** so that DDBHH users can interpret and apply the information equitably.

## DWCC's Reply to the Telco Industry

298. Several large ISPs, including **Bell, Rogers, TELUS, Cogeco, Eastlink**, and **Quebecor**, resist prescriptive measurement frameworks. They argue that network infrastructure varies by region, making standardization difficult, that each ISP has internal tools suited to their systems, and that existing industry practices are sufficient under current codes.
299. **DWCC** disagrees. While infrastructure differences exist, these cannot justify a lack of public transparency or enable the continued use of non-equivalent or opaque measurement tools. Providers must be required to use common definitions (e.g., peak speeds, typical latency), follow CRTC-approved test methodologies, and submit methodologies for independent verification.
300. When ISPs use inconsistent tools or undefined test windows, it becomes impossible for consumers to compare services, and **accessibility planning** becomes unreliable.
301. **SSi Canada** argues that rigid standards may not reflect realities in satellite or remote areas. **DWCC** proposes a solution: allow some contextual flexibility in data interpretation but require all providers to report their measurement methodology using a shared disclosure format.

## DWCC's Concluding Position to Q15

302. **DWCC** recommends that the Commission require all ISPs to publicly disclose their methodologies for calculating:
- **Maximum speeds**: Indicate whether these are theoretical, lab-based, or field-tested; under what conditions; and how often measured.
  - **Average speeds**: Include the range of results across the day/week, and whether measurements include peak and off-peak periods.
  - **Typical speeds**: Report during peak hours (7–11 PM local time), based on actual observed data.
  - **Latency and jitter**: Define how and when these are measured, including endpoints, duration, and tools used.
- Packet loss and reliability**: Include failure thresholds, downtime events, and network recovery windows.
303. These disclosures must:

1. Use a standardized reporting template, accessible to both consumers and regulators

2. Be published on provider websites and **submitted to the Commission regularly**

3. Be presented in:

- **Plain language**
- **Visual formats**
- **ASL/LSQ video guides**
- **Screen-reader-compatible formats**

4. Be verified by independent organizations (e.g., CIRA, SamKnows), and subject to audit or random review

304. **DWCC** DWCC also recommends that the Commission create a national transparency portal that displays ISPs' performance methodologies side-by-side, allows consumer comparison and third-party research, and provides interactive tools to explain metrics with visual overlays and ASL/LSQ summaries.

305. Without common methodologies, consumers are left comparing **apples to oranges**, undermining informed decision-making—particularly for accessibility users who depend on network precision for equitable access.

306. The Commission must ensure that methodological clarity is mandated, not assumed. Accuracy without transparency is meaningless.

## **REPLY TO Q16**

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

### **DWCC's Position and Overview**

307. The DWCC strongly recommends that network performance metrics—such as speed, latency, jitter, and packet loss—be accompanied by **real-world contextual explanations** that make them **understandable, relevant, and usable** to all consumers, particularly **Deaf, Deaf-Blind, and Hard of Hearing (DDBHH)** individuals.

308. Technical terms such as “100 Mbps” or “25ms latency” are meaningless to many consumers unless placed within the context of daily communication,

accessibility services, or media use. **DWCC** emphasizes that performance data must be translated into **visual, plain language, and signed language explanations**, showing what these metrics mean functionally for activities like **video calling** in **ASL/LSQ**, streaming **captioned content**, using **VRS or RTT**, and accessing **real-time education or emergency services**.

309. Without this framing, broadband labels remain **opaque and inaccessible**, especially to users with limited technical literacy or who rely on **visual-first or language-modified interfaces**.

### **DWCC's Reply to Consumer Groups**

310. **DWCC** supports and builds on the recommendations of several public interest and consumer groups who advocate for contextual framing of performance data:
311. **PIAC, Pavlović et al., and Union des consommateurs** recommend incorporating use-case scenarios (e.g., “suitable for 3 HD video calls” or “may not support gaming with <100ms latency”) alongside speed metrics.
312. The **Competition Bureau** and **CCTS** emphasize that numeric-only metrics are inaccessible and must be complemented with layered visual tools and practical comparisons.
313. This kind of contextualization allows consumers—especially DDBHH users—to make decisions based on **usability**, not just advertised numbers.

### **DWCC and Deaf Groups Response**

314. **The City of Calgary, DHH Coalition, and CDGM** recommend that broadband labels present metrics using color-coded icons or performance indicators, include **signed video explanations** and **plain language narratives**, and show how metrics impact **accessibility-related services**.
315. **DWCC** fully supports this recommendation and agrees that functional impact framing is essential for accessibility. For example, a jitter rate above 30ms may cause **signing** or **captions** to appear choppy during a **video call**, while an upload speed under 5 Mbps may prevent **real-time video interpreting** from functioning reliably.

## DWCC's Reply to the Telco Industry

316. Many ISPs, including **Bell, TELUS, Rogers, Cogeco, Quebecor**, and **Eastlink**, express caution about regulator-mandated educational content. They argue that contextualizing metrics is subjective and difficult to standardize, that overloading the label with explanations could overwhelm consumers, and that each ISP should retain flexibility in how it presents service performance.
317. **DWCC** disagrees. While flexibility in design is welcome, **contextualization is not optional**. It is **critical to functional accessibility**, particularly for consumers who rely on stable and predictable performance for essential communication tools.
318. **SSi Canada** suggests that contextual tools may have limited usefulness in areas where there are few choices or in regions with limited service tiers. **DWCC** counters that **transparency is always useful**, especially in underserved or rural regions, where expectation management and **accessibility planning are vital**.
319. If anything, consumers in those regions need even more detailed explanations of what their connection can and cannot support.

## DWCC's Concluding Position to Q16

320. **DWCC** urges the Commission to require that all broadband consumer labels include contextual explanations for each performance metric, including:

### 1. Internet speed (download/upload)

- “10 Mbps upload = suitable for 1 high-definition ASL video call”
- “25 Mbps download = supports up to 3 captioned video streams simultaneously”

### 2. Latency

- “50ms latency = acceptable for video relay calls”
- “150ms latency = may cause delay in ASL signing or captioning sync”

### 3. Jitter

- “>30ms jitter = may disrupt video smoothness and caption readability”

#### 4. Packet loss

- “>1% = likely to result in dropped signs, incomplete captions, or frozen video”

321. **DWCC** also recommends the use of:

- **Color-coded visual scales** (e.g., green/yellow/red indicators)
- **Icons showing task suitability** (✓ or ✗ for streaming, video calls, telehealth, etc.)
- **Interactive web tools** that allow consumers to input household usage and see performance recommendations
- **ASL/LSQ video guides** embedded on provider sites and on the CRTC’s broadband label portal

322. These Many ISPs, including **Bell, TELUS, Rogers, Cogeco, Quebecor, and Eastlink**, express caution about regulator-mandated educational content. They argue that contextualizing metrics is subjective and difficult to standardize, that overloading the label with explanations could overwhelm consumers, and that each ISP should retain flexibility in how it presents service performance.

323. Performance data without context is useless to most, and **inaccessible to many**. The Commission must ensure that consumers can understand how internet metrics impact the **services they rely on for daily life**—particularly accessibility services.

## REPLY TO Q17

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

### DWCC’s Position and Overview

324. The DWCC affirms that in addition to speed, latency, and jitter, several other network performance metrics require contextualization to ensure that all consumers—especially **Deaf, Deaf-Blind, and Hard of Hearing (DDBHH)** users—can understand how these metrics affect **accessibility, communication reliability, and service suitability**.

325. Specifically, **DWCC** recommends that contextual explanations be provided for packet loss, service reliability and uptime, outage frequency and duration, congestion impact such as throttling or slowdowns, and burst latency or jitter spikes.
326. These performance indicators directly impact video-based and real-time communication, such as **VRS (Video Relay Service)**, **Video Calling apps** or **Zoom** in **ASL/LSQ**, **captioned content streaming**, **emergency RTT 911 messaging**, and **online interpreting** and **telehealth**.
327. Without a clear explanation, these metrics are often ignored, misunderstood, or misrepresented—leaving accessibility-focused users vulnerable to service failures and degraded **communication access**.

### **DWCC's Reply to Consumer Groups**

328. **DWCC** aligns with consumer organizations who call for greater contextualization of secondary but impactful network metrics
329. **PIAC**, **CCTS**, **Competition Bureau**, **Pavlović et al.**, and **Union des consommateurs** all recommend expanding contextual explanations to include lesser-known performance factors that affect user experience, reliability, and equity.
330. To support informed decisions, these metrics must be **demystified using language and visuals that connect directly to accessibility outcomes**.

### **DWCC and Deaf Groups Response**

331. **The City of Calgary**, **DHH Coalition**, and **CDGM** emphasize the need to explain what happens when packet loss exceeds 1–2%, why burst jitter causes **caption lag** or **ASL image breakup**, and how service reliability metrics should inform plan selection, particularly in underserved regions.
332. **DWCC** fully supports this position and agrees that these indicators are especially relevant to DDBHH users, who may be disproportionately impacted by issues like sudden call dropouts, frozen or **delayed signing during video calls**, and repetitive buffering that breaks the flow of communication.

## DWCC's Reply to the Telco Industry

333. Some ISPs—including **TELUS, Rogers, Bell, Cogeco, Eastlink,** and **Quebecor**—acknowledge that additional metrics like packet loss or reliability can be useful, but caution against overloading labels with too much data, confusing consumers with technical details, and mandating too many requirements across different infrastructure types.
334. **DWCC** disagrees with the suggestion that such metrics should be optional or buried in technical footnotes. For DDBHH users, metrics like packet loss and uptime are not secondary—they are **primary** determinants of whether communication services function at all.
335. Providers already track these indicators internally. The issue is not data availability—it is failure to present this information in **an accessible, usable form**. The Commission should mandate that these metrics be surfaced clearly and framed around their impact on user experience, especially for **accessibility users**.
336. **SSi Canada** suggests these metrics may be too granular for smaller ISPs to report. **DWCC** recommends flexibility in reporting methods or granularity, but not in whether the data is disclosed.

## DWCC's Concluding Position to Q17

337. **DWCC** recommends that the Commission require ISPs to **contextualize and publicly report** the following additional performance metrics:

### 1. Packet Loss

- 1% packet loss can lead to:
- Choppy or dropped signs during video calls
- Caption desynchronization or missing text
- Video freezing that breaks comprehension flow

### 2. Service Reliability / Uptime

- Should disclose:
- Frequency of service outages
- Duration of downtime events

- Time-to-repair averages
- Accessibility users often **cannot rely on voice-based backups**, making consistent uptime essential.

### 3. Congestion Impact

- Must indicate when throttling or slowdowns may occur (e.g., during peak hours or after data cap thresholds)
- DDBHH users may experience **disrupted access** to communication tools during congestion

### 4. Burst Latency or Jitter Spikes

Even brief spikes can:

- **Interrupt live interpreting**
- **Cause caption misalignment**
- **Break ASL video rhythm**

338. **DWCC** recommends presenting this information through:

- **Visual indicators** (e.g., traffic light-style risk charts)
- **Task icons** (✓ or ✗ for real-time video, captioned streaming, VRS, etc.)
- **ASL/LSQ video guides** that explain:
  - What these terms mean
  - How they impact communication quality
  - How to assess whether a plan meets accessibility needs

339. All of this should be integrated into:

- Broadband labels
- ISP websites and mobile apps
- Billing portals and Critical Information Summaries
- **A CRTC-hosted accessibility explainer hub**

340. These contextual explanations **empower DDBHH users to make informed, safe, and accessible service choices**. They also help providers understand the human impact of abstract technical metrics.

341. **Accessibility** cannot be achieved through raw numbers alone—it requires **interpretation, explanation, and design that reflects how people actually communicate**.

## REPLY TO Q18

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

### DWCC's Position and Overview

342. The **DWCC** strongly supports requiring that broadband consumer labels and all associated service performance and accessibility information be provided **at both the pre-sale and post-sale stages**—across all platforms and formats
343. For **Deaf, Deaf-Blind, and Hard of Hearing (DDBHH)** consumers, a full understanding of a broadband service's capabilities often depends on delayed review with family, **interpreters, or visual translation tools**. A one-time, point-of-sale disclosure is **insufficient** for ensuring informed, **accessible decision-making**.
344. **DWCC** emphasizes that true accessibility is not achieved at a single moment but through continued visibility, usability, and discoverability throughout the customer relationship. Both pre-and post-sale deliveries are required to uphold the principles of **functional equivalency**, consumer protection, and the **Accessible Canada Act**.

### DWCC's Reply to Consumer Groups

345. **DWCC** agrees with consumer advocacy organizations calling for multi-stage, persistent access to broadband labels and service performance disclosures:
346. **CCTS, PIAC, Union des consommateurs, and the City of Calgary** all support embedding performance and service quality information into pre-sale advertising, contracts and Critical Information Summaries (CIS), and post-sale billing portals and customer dashboards.
347. These groups recognize that consumers benefit from being able to revisit, compare, and challenge service terms after activation—especially when problems arise or plans change.

## DWCC and Deaf Groups Response

348. **The DHH Coalition, CDGM, and Manitoba Coalition** highlight that accessibility users may need to review service details more than once, often with the assistance of **ASL/LSQ interpreters**, family or support persons, or **visual and plain-language translations**.
349. **DWCC** fully supports this position and adds that persistent **access** is especially important for DDBHH users, who may miss key details at the point of sale due to lack of **signed or visual access**, require post-sale clarification for complaints, upgrades, or troubleshooting, and need to reference terms months later in billing or service disputes.

## DWCC's Reply to the Telco Industry

350. Major providers, including **Bell, Rogers, TELUS, Cogeco, Eastlink**, and **Quebecor**, argue that post-sale label duplication is unnecessary due to the existence of CIS and other documentation, that performance terms can be summarized once at the pre-sale stage, and that providing materials multiple times may create an administrative burden.
351. **DWCC** respectfully disagrees. While CIS documents contain some contractual terms, they are often not accessible—for example, they may lack **ASL/LSQ content, plain language formatting, or screen reader compatibility**. They also do not provide real-time performance data and are not designed to explain usability or accessibility implications.
352. Providers' preference for limiting disclosure frequency may reduce operational complexity—but it does so at the cost of equity, clarity, and trust.
353. **SSi Canada** suggests that smaller providers may lack the infrastructure to provide post-sale updates. **DWCC** recommends the use of centralized, **CRTC-hosted performance label repositories**, templated and simplified formats for small ISPs, and email or SMS-based delivery systems to ensure post-sale access.
354. No provider should be exempt from providing ongoing access to service terms and performance explanations—particularly those serving rural, northern, or Indigenous areas.

## DWCC's Concluding Position to Q18

355. **DWCC** strongly urges the Commission to mandate that **broadband consumer labels and all accessibility-related service information be available both pre-sale and post-sale.**

356. At a minimum, these materials must be:

**1. Presented before service is activated, at:**

- Provider websites and mobile apps
- In-store and retail interactions, with an accessible QR code scannable to access an on-demand sign language interpreter
- VRS or live chat interactions
- Third-party vendor locations

**2. Delivered after service activation, via:**

- Welcome emails with downloadable performance labels
- Monthly billing portals or dashboards
- Paper bills or summary inserts (if requested)
- Customer mobile apps or live chat interactions

**3. Updated as needed, when:**

- Network conditions change
- Speed tiers or data caps are modified
- New **accessibility features** or service limitations are introduced

**4. Provided in:**

- **Plain language summaries**
- **High-contrast visual formats**
- **ASL/LSQ video guides**
- **Screen-reader-compatible documents**

**5. Archived or downloadable in:**

- **A CRTC-hosted performance label portal**
- Provider account management pages
- Email links and renewal notices

357. **DWCC** emphasizes that accessibility depends on continuity. A label provided once is not sufficient to meet the needs of DDBHH consumers. Performance, pricing, and support details must be **accessible** when choosing a plan, when seeking help, when disputing charges, and when deciding whether to switch.

358. The Commission must ensure that **post-sale accessibility is not treated as optional. Equity does not expire after a contract is signed.**

## REPLY TO Q19

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

### DWCC's Position and Overview

359. The **DWCC** strongly recommends that all broadband performance and accessibility-related service information be presented on a standardized label and that this label be embedded in multiple consumer-facing locations and formats, including ISP websites next to plan descriptions, in-store signage and with an accessible QR code scannable to access an on-demand sign language interpreter for support interactions, mobile apps and customer portals, and contracts, Critical Information Summaries (CIS), and billing documents.

360. To ensure that **Deaf, Deaf-Blind, and Hard of Hearing (DDBHH) users**—and all **accessibility-dependent consumers**—have **equitable access**, this information must be highly visible, bilingual and **delivered in ASL/LSQ, available in screen-reader-compatible, plain language**, and **visual formats**, and consistently provided across all channels and platforms.

361. Information that is hidden behind hyperlinks, fine print, or inconsistent delivery methods creates systemic barriers to informed consent and service management.

### DWCC's Reply to Consumer Groups

362. **DWCC** aligns with numerous consumer and accessibility groups that support standardized labels and **multi-channel accessibility**.

363. The **Competition Bureau, CCTS, PIAC, Union des consommateurs**, and **City of Calgary** all call for labels to be displayed prominently during plan selection, integrated into customer service flows, and embedded in documents and dashboards that consumers already use, such as Critical Information

Summaries (CIS) and billing platforms. These groups caution against relegating labels to optional “learn more” pages, burying accessibility information in hard-to-find areas, or making key metrics accessible only via downloadable PDFs.

364. In conclusion, DWCC strongly agrees that standardized labels must be prominently displayed, integrated into core customer touchpoints, and **accessible across all service channels**. Burying critical information behind optional links or inaccessible formats undermines consumer rights and directly contradicts the goals of transparency, equity, and accessibility. To be effective, labels must be visible, actionable, and **inclusive by design**—not treated as optional add-ons.

### DWCC and Deaf Groups Response

365. **DHH Coalition, CDGM, and DWCC** highlight that accessibility users may need to review service details more than once, often with the assistance of **ASL/LSQ interpreters**, family or support persons, or **visual** and **plain-language translations**.
366. **DWCC** fully supports this position and adds that **persistent access** is especially important for DDBHH users, who may miss key details at the point of sale due to **lack of signed** or **visual access**, require post-sale clarification for complaints, upgrades, or troubleshooting, and need to reference terms months later in billing or service disputes. Ensuring consistent access to service information throughout the consumer journey is critical to **achieving functional equivalency**.

### DWCC’s Reply to the Telco Industry

367. Major ISPs—including **Bell, TELUS, Rogers, Cogeco, Eastlink**, and **Quebecor**—tend to oppose rigid display requirements. They argue that labels should be available upon request, that flexibility is needed to prevent clutter in retail environments, and that requiring in-context display, such as placing the label directly next to each plan, could limit design options or marketing flexibility.
368. **DWCC** rejects these arguments. Labels that are not visible by default—or that rely on consumers to request access—undermine the entire purpose of standardization and transparency.

369. Visual clutter is not a valid reason to sacrifice **accessibility** or informed consent. Instead, labels should be integrated into interfaces using **accessible design**—such as collapsible visual modules, hover details, or embedded video overlays—and supplemented by interactive and educational materials for those who need more context.
370. **SSi Canada** recommends minimalist implementations for bandwidth-limited or remote contexts. **DWCC** agrees that offline delivery (e.g., printed labels or SMS/email access links) should be made available—but not at the cost of removing mandatory access from core locations.

### **DWCC’s Concluding Position to Q19**

371. **DWCC** urges the Commission to require ISPs to present all broadband consumer label content in a standardized format, and to embed the label in the following locations and materials, with the following **mandatory Locations**:

1. **ISP websites**, directly next to:

- Every residential broadband plan listing
- Shopping cart or plan selection interface
- Support comparison pages

2. **Retail stores and kiosks**, including

- Printed copies in physical displays
- Tablet or screen-based signage with **ASL/LSQ playback**

3. **Mobile apps**, visible on:

- Plan overview pages
- Billing summaries
- Service change request flows

4. **Contracts and Critical Information Summaries (CIS)**, printed or emailed

5. **Billing statements or portals**, especially during renewals or changes

6. **CRTC-hosted public broadband label directory**, searchable by:

- Provider
- Region
- Plan type

- **Accessibility features**

**372. Accessibility Requirements:**

- Plain language summaries
- High-contrast, **icon-based visuals**
- Embedded **ASL/LSQ video descriptions**
- **Downloadable HTML and accessible PDFs**
- Available in Braille and large-print upon request

373. This level of standardized, persistent, and **accessible presentation** is necessary to ensure that all Canadians—regardless of hearing status, literacy, or digital fluency—can make informed, empowered choices.

374. **DWCC** reiterates: visibility, consistency, and redundancy are not optional—they are **core tenets of accessibility**. The Commission must ensure that broadband labels are not only well-designed but properly deployed across all consumer touchpoints.

## **REPLY TO Q20**

**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?**

## **DWCC's Position and Overview**

375. The **DWCC** strongly agrees that all ISPs currently subject to the Internet Code must also be fully bound by all new consumer protections established through this proceeding. This includes all mandatory requirements related to standardized broadband consumer labels, performance metric disclosures, **accessibility format standards**, pre-sale and post-sale information availability, and complaint resolution and enforcement obligations.

376. **DWCC** stresses that existing inclusion under the Internet Code must not serve as a loophole for avoiding new responsibilities. On the contrary, ISPs under the Code should be held to a higher standard of accountability and transparency, consistent with the expectations set out in the **Accessible Canada Act**, the 2023 Policy Direction, and the Commission's public interest mandate.

## DWCC's Reply to Consumer Groups

377. **DWCC** aligns with strong, consistent support from public interest organizations calling for complete regulatory alignment between the Internet Code and any new consumer protections emerging from this proceeding:
378. **PIAC, CCTS, Pavlović et al., Competition Bureau, Union des consommateurs**, and **Manitoba Coalition** all agree that ISPs under the Internet Code should be fully subject to new protections, and that exemptions or fragmented implementation would confuse consumers.

## DWCC and Deaf Groups Response

379. **DWCC, CDGM, DHH Coalition**, and the **City of Calgary** support **strong integration** of new broadband label rules into the existing Internet Code framework, particularly to ensure **equal accessibility** across providers, eliminate service-level **inequality** for DDBHH users, and prevent consumer protection gaps due to inconsistent ISP obligations.
380. **DWCC** fully aligns with this position and emphasizes that applying new protections only to some providers or plans would deepen systemic disparities—particularly for **accessibility-reliant users** who may be forced to choose between affordability and functionality. Ensuring uniform application of protections is essential to **achieving digital equity** and **upholding accessibility rights**.

## DWCC's Reply to the Telco Industry

381. **DWCC** notes that no formal opposition was raised by ISPs against aligning new broadband consumer label requirements with the Internet Code. However, some industry responses imply concern about the cost of retrofitting legacy systems, potential duplication of rules, and the need for flexibility for ISPs with different operating models.
382. **DWCC** firmly asserts that such concerns cannot override the regulatory imperative to create a coherent, enforceable, **and accessibility-centred consumer protection framework**.
383. The Internet Code already outlines minimum requirements for contract clarity and customer rights. This proceeding builds on those obligations to ensure that all consumers—not just some—receive the same baseline of transparency and

**accessibility.**

384. Fragmentation between “Internet Code obligations” and “label requirements” would confuse consumers, undermine enforcement, and create unequal experiences for those who rely on **accessibility features**, particularly DDBHH users.

### **DWCC’s Concluding Position to Q20**

385. **DWCC** strongly recommends that the Commission:

1. **Mandate that all ISPs currently subject to the Internet Code also be fully subject to any and all new protections** resulting from this proceeding.

2. **Amend or append the Internet Code** to explicitly reference:

- Standardized broadband consumer labels
- **Accessibility delivery requirements (ASL/LSQ, plain language, etc.)**
- Enforcement mechanisms tied to performance transparency

3. Apply these protections **uniformly** across:

- All sales channels (online, in-store, third-party)
- All service tiers (entry-level, premium, bundle plans)
- All contract formats (prepaid, postpaid, flanker brands)

4. Prohibit:

- Tiered implementation of label standards based on provider size or structure
- “Opt-outs” for subsidiaries or alternative marketing brands
- **Deferred timelines for accessibility-related compliance**

386. **DWCC** further recommends that the Commission **consult DDBHH consumers and accessibility advocates** as it integrates label standards into the Internet Code, to ensure that accessibility remains a **core regulatory principle—not an afterthought**.

387. In conclusion, **there can be no two-tiered system for consumer protection** in Canada’s internet marketplace. The Commission has a legal and ethical

obligation to ensure that all ISPs deliver the same rights, transparency, and **accessibility**—regardless of their structure or market segment.

## REPLY TO Q21

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

### DWCC's Position and Overview

388. The DWCC **strongly** supports the development of a more responsive, **accessible, and equity-based approach** to resolving consumer protection complaints. While the **CCTS** currently provides a neutral mechanism for dispute resolution, the system remains **inaccessible or ineffective for many Deaf, Deaf-Blind, and Hard of Hearing (DDBHH)** consumers.

389. **DWCC** affirms that consumer protection frameworks must be redesigned through an **accessibility lens**, recognizing that many individuals face **barriers to communication** during complaint intake, **lack plain language** or **signed language** options, and experience delays due to **systemic inaccessibility** or **service failures**.

390. Complaint processes must prioritize timeliness, **language access, communication accessibility**, and accountability. Resolving **accessibility-related** complaints should not require navigating a hearing-centric or text-heavy system.

### DWCC's Reply to Consumer Groups

391. **DWCC** aligns with the position of numerous consumer advocacy organizations who support enhancing the responsiveness and inclusiveness of telecom complaint frameworks.

392. **PIAC, CCTS, Pavlović et al., Competition Bureau**, and the **City of Calgary** call for more explicit service timelines, better transparency around complaint outcomes, accessibility enhancements, and stronger enforcement of resolution timelines.

## DWCC and Deaf Groups Response

393. **DWCC, DHH Coalition, CDGM, and Union des consommateurs** argue that DDBHH consumers frequently struggle to file and follow complaints due to language, literacy, and **cognitive access barriers**; that existing processes are often too slow, too complex, or not available in **signed** or **visual formats**; and that complaint pathways must reflect the reality of **intersectional disability** and **communication challenges**.

394. **DWCC** fully supports and aligns with these findings, and calls for systemic reforms to embed **accessibility** as a core operational principle of complaint handling.

## DWCC's Reply to the Telco Industry

395. Some ISPs acknowledge the importance of improving complaint responsiveness but express caution regarding mandating new requirements on the **CCTS**, public disclosure of complaint metrics, and **expanded accessibility formats** without further review.

396. **DWCC** believes that this position does not go far enough. Telecom providers benefit from the **existence of the CCTS as a reputational shield** but **must be held to higher accessibility standards and consumer respect**. If accessibility-related complaints are consistently underreported or unresolved, that reflects a **structural failure**—not an individual communication error.

397. Telecom providers should not only support enhancements to the **CCTS** framework, they should **co-fund and co-develop** the tools required to make it **accessible** for all users.

## DWCC's Concluding Position to Q21

398. **DWCC** recommends that the Commission **direct the CCTS and telecom providers to co-develop a new consumer protection complaints framework** that includes:

### 1. ASL/LSQ Access for Complaint Intake and Follow-Up

- Video intake forms
- VRS-compatible complaint pathways
- Interpreter-supported resolution calls

- **Direct ASL/LSQ video customer service**

## **2. Plain Language and Visual Complaint Summaries**

- **Accessible explanations of complaint rights, next steps, and outcomes**
- Flowcharts and visual guides (available in both English and French)

## **3. Accessibility-Based Complaint Tagging**

- Ability to file complaints under specific **accessibility issues (e.g., no ASL support, inaccessible website, dropped captioning, VRS failure)**
- Aggregate these issues into **quarterly accessibility reports** to the CRTC

## **4. Service Timelines and Escalation Protocols**

- Defined response time requirements for accessibility-related complaints (e.g., 3-day initial reply; 10-day resolution)
- Optional “**Accessibility Fast-Track**” stream for urgent issues (e.g., loss of VRS, emergency access failures)

## **5. Public Metrics and Reporting**

- Volume of complaints by accessibility category
- Time to resolution
- Provider-specific breakdowns for transparency and accountability

399. **DWCC** further recommends that the CRTC fund or require industry to fund an **accessibility working group** at the **CCTS**, ensure all complaint resources are available in **ASL/LSQ, plain language**, and **screen reader–friendly formats**, and **monitor accessibility complaint trends** and escalate enforcement actions for repeat offenders.

400. For DDBHH users, complaint accessibility is not about convenience—it is about **equal access to recourse**. A complaint system that is difficult to navigate, slow to respond, or hostile to visual language users **is not compliant with the Accessible Canada Act** or the 2023 Policy Direction.

401. The Commission must treat accessibility-based consumer protection not as a “special category,” but as a foundational right. **DWCC** stands ready to collaborate on building a more just, **accessible**, and responsive complaint system for all.

## REPLY TO Q22

**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?**

### DWCC’s Position and Overview

402. The **DWCC** strongly supports the collection and public reporting of data on ISP non-compliance and service failures, particularly those affecting performance, **accessibility**, and consumer rights. Transparent reporting promotes accountability, informed consumer choice, evidence-based policy development, and systemic improvement across the industry.
403. For **Deaf, Deaf-Blind, and Hard of Hearing (DDBHH)** users, public data on ISP failures is not only informative—it is essential to determine whether a provider has a **track record of meeting accessibility** and performance **obligations**.
404. **DWCC** urges the Commission to develop a national **ISP Compliance Dashboard**, updated quarterly, that includes detailed reporting on where providers fall short—and what action is being taken.

### DWCC’s Reply to Consumer Groups

405. **DWCC** supports these measures and stresses the importance of **accessibility-specific** indicators, including delays in **accessibility accommodation**, repeated failures to offer **ASL/LSQ support**, **poor responsiveness to VRS**, **RTT**, or **captioning issues**, and the use of inaccessible websites, apps, or documentation.
406. **DWCC** adds that standard compliance metrics are not sufficient—the Commission must include **accessibility compliance metrics**, aligned with the **Accessible Canada Act** and CRTC 2023 Policy Direction.

## DWCC and Deaf Groups Response

407. **CDGM** and the **DHH Coalition** support the call for greater transparency through mandatory public reporting on service quality and compliance issues.
408. **DWCC** fully aligns with this position and emphasizes that public access to ISP performance and complaint resolution metrics, publication of enforcement actions or systemic issues, and increased visibility into service delivery gaps are essential for holding providers accountable and empowering consumers—especially DDBHH users who have historically faced **barriers to accessing** clear, reliable information about their service experience.

## DWCC's Reply to the Telco Industry

409. ISPs, including **Bell, TELUS, Rogers, Cogeco, Eastlink, and Quebecor**, express concern about the reputational harm of public reporting, the burden of collecting and submitting detailed compliance data, and ensuring accuracy and context in public-facing data.
410. **DWCC** disagrees with these concerns. Consumers—including accessibility-reliant users—are entitled to transparency, particularly when selecting providers or filing complaints. If a provider is consistently failing to meet regulatory obligations, that **must be visible to the public**.
411. Transparency is not punishment—it is accountability.
412. **SSi Canada** raises concerns about privacy and fairness for small providers. **DWCC** recommends that small providers be included using scaled, proportional reporting frameworks; that confidential customer data be protected while aggregate, anonymized compliance metrics remain mandatory; and that the reporting system be structured with tiered obligations to avoid overburdening while still maintaining transparency.

## DWCC's Concluding Position to Q22

413. **DWCC** urges the Commission to develop and publish a **national ISP Compliance Dashboard**, with quarterly updates and filters for accessibility-specific metrics. At a minimum, this dashboard should include:

### A. Performance Failures

- % of connections falling below advertised or typical speeds

- Outages by region and duration
- Peak period degradation incidents

## **B. Accessibility Failures**

- % of **ASL/LSQ** requests not fulfilled within target time
- Number of unresolved accessibility complaints
- **Compliance with WCAG 2.2 for websites and apps**
- **Availability of signed videos**, plain language, and visual guides

## **C. Complaint Resolution Metrics**

- Complaint volumes (by category, including accessibility)
- Average resolution time
- Escalation rates
- Outcomes by provider

## **D. Enforcement and Monitoring**

- Notices of violation
- Administrative monetary penalties (AMPs)
- Remediation actions or audits underway
- **CCTS** referrals and feedback summaries

414. **DWCC** recommends the data be machine-readable and downloadable, accompanied by **plain language** and **ASL/LSQ** summaries, and viewable on a public, filterable CRTC dashboard by provider, region, and compliance area.

415. Consumers cannot make informed, equitable decisions if they do not know who is meeting obligations, who is falling short, and what happens when standards are violated.

416. Transparency must become a systemic expectation—not an exception. The Commission’s leadership on this file will shape how seriously **accessibility**, performance, and consumer trust are treated across Canada’s telecom industry.

## **REPLY TO Q23**

**Q23. What additional measures could the Commission implement if repeated complaints about pre-and/or post-sale information are received?**

## DWCC's Position and Overview

417. The **DWCC** strongly recommends that the Commission adopt a tiered enforcement framework for repeated violations of pre-sale and post-sale transparency obligations—particularly those related to **accessibility and functional equivalency**.
418. Repeated complaints—especially from **Deaf, Deaf-Blind, and Hard of Hearing (DDBHH)** consumers—signal not isolated customer dissatisfaction but systemic failure. When ISPs repeatedly fail to disclose accurate information, or when they disregard accessibility obligations, the Commission must respond with consequences that are meaningful, public, and enforceable.
419. Consumer trust cannot be maintained if repeated failures are met with inaction. The Commission must act not only as a regulator but as a guardian of **digital equity and accessibility rights**.

## DWCC's Reply to Consumer Groups

420. **DWCC** aligns with multiple consumer and public interest organizations that call for graduated, public-facing enforcement measures when ISPs fail to meet disclosure and accessibility requirements.
421. **PIAC, CCTS, Competition Bureau, Union des consommateurs, Pavlović et al., and the City of Calgary recommends** that the CRTC issue formal warnings for non-compliance, require public corrections or re-disclosures, impose administrative monetary penalties (AMPs) for repeat violations, and make complaint and enforcement records public and comparable.

## DWCC and Deaf Groups Response

422. **DWCC** supports these tools and further emphasizes that **accessibility failures**—especially related to pre-sale clarity or post-sale support—**must trigger a regulatory review**. Consumers with communication barriers face heightened risk when disclosures are incomplete, inconsistent, or misleading.

## DWCC's Reply to the Telco Industry

423. Some ISPs argue that enforcement should remain collaborative and caution against reputational damage from public non-compliance reports, “over-regulation” through penalties, and imposing rigid thresholds that don’t

account for operational complexity.

424. **DWCC** rejects these arguments. While cooperative compliance is always preferred, it is insufficient when a pattern of harm persists. Repeated failure to provide clear, **accessible**, and accurate service information erodes consumer rights, creates information asymmetry, and disproportionately harms equity-seeking groups, including DDBHH users.

425. The burden of inaccessibility should not fall on consumers. It must be met with proactive regulation and consequences for inaction.

### **DWCC's Concluding Position to Q23**

426. **DWCC** urges the Commission to adopt a **graduated enforcement model** for repeated failures in pre- and post-sale information disclosure, particularly when those failures affect **accessibility**, service comparability, or complaint resolution.

427. **DWCC** recommends the following measures be implemented:

#### **1. Trigger-Based Enforcement Framework**

- 3+ similar complaints in a defined period triggers an automatic review
- Accessibility-related complaints are **prioritized for investigation**

#### **2. Public Correction Notices**

- Providers must issue visible correction notices via:
- Website banners
- Account dashboards
- Emails to affected consumers
- **ASL/LSQ signed video versions**

#### **3. Administrative Monetary Penalties (AMPs)**

- Applied progressively based on severity and recurrence
- Funds earmarked for accessibility initiatives and digital literacy education

#### **4. Label Suspension or Service Hold**

- Repeated violations may result in temporary suspension of plan promotions, advertisements, or label listing on the CRTC's public site

#### **5. Accessibility Compliance Scorecard**

CRTC publishes quarterly accessibility compliance rankings for ISPs, metrics include:

- Disclosure accuracy
- Complaint resolution speed
- Accessibility failures and responsiveness
- Availability of **ASL/LSQ** and plain language materials

## **6. Independent Audit Requirement**

- Repeat offenders required to undergo third-party audit of:
- Pre-sale communication flows
- Contract summaries
- **Accessibility interface standards**
- Complaint-handling systems

## **7. Consumer Empowerment Tools**

- Notification to affected users when a provider is under investigation
- Explanation of rights and alternative complaint paths
- Education resources in **visual and signed formats**

428. **DWCC** further urges that **DDBHH-focused** complaint categories be formally tracked and used to trigger regulatory response when patterns emerge. The Commission should treat accessibility compliance as seriously as technical or pricing compliance.

429. To ensure accountability and trust, the Commission must publicly document its response to repeated violations—not behind closed doors, but through transparent, data-backed enforcement visible to consumers and communities.

430. This approach is not punitive—it is restorative. It aims to rebuild trust, prevent future harm, and protect the dignity and rights of consumers, especially those most often excluded.

## **DWCC Concluding Summary**

431. The **DWCC**-CSSSC respectfully submits that the CRTC 2024-318-2 proceeding must establish not just a standardized broadband label—but an enforceable, equity-driven disclosure system that integrates accessibility by design.

432. From Questions 1 to 23, we demonstrate that:

- DDBHH consumers are disproportionately harmed by unclear labels, missing metrics, and inaccessible service descriptions.
- The broadband label is more than a marketing tool—it is an accessibility rights instrument under ACA.
- Enforcement and transparency mechanisms are essential to build trust and protect vulnerable users.

433. We urge the Commission to:

- Adopt a **signed, plain-language broadband label standard**.
- Mandate regional and metric-based transparency.
- Ensure all label elements are offered pre-and post-sale.
- Require **ASL/LSQ-integrated complaint pathways**.
- Apply all consumer protections under the Internet Code to any new obligations.

434. The Commission has the **opportunity to create a telecommunications system that is inclusive by design—not reactive by exception**.

### Participation in the Proceeding

435. **DWCC** submits this final reply in the spirit of constructive collaboration, grounded in its extensive advocacy work and lived experience as an accessibility organization serving the Deaf, Deaf-Blind, and Hard-of-Hearing (DDBHH) communities. The Committee trusts that the record developed through **DWCC's** submissions provides meaningful, evidence-based contributions to Telecom Notice of Consultation CRTC 2024-318-2 which focuses on making it easier for consumers to shop for Internet services.

436. **DWCC** appreciates the Commission's thoughtful consideration of our reply which responds to both the input of consumer advocacy groups and the positions presented by telecommunications service providers.

437. It is essential that the voices, lived experiences, and **accessibility needs of DDBHH** and other equity-seeking communities are not only heard but meaningfully integrated into the development of inclusive, enforceable policies under this proceeding. **True accessibility requires direct representation and accountability in regulatory outcomes.**

Should you have any questions or require further 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**)

**\*\*\*\*END OF DOCUMENTS\*\*\*\***