



## Deaf Wireless Canada Consultative Committee

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### VIA EMAIL DISTRIBUTION and GC KEY

August 7, 2025

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

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

### [Telecom Notice of Consultation CRTC 2024-318-4](#)

Dear Mr. Morin,

**Re: [TNC CRTC 2024-318-4](#) - Making it easier for consumers to shop for Internet services -  
Response to Requests for Information**

The DWCC thanks the Commission for its participation in the public hearing held in June 2025. The DWCC is pleased to present its response to the CRTC's requests for information. Please see our responses as follows:

### **Question 1: Peak Periods**

**Many parties have taken the view that a 7 pm to 11 pm window (local time) constitutes an adequate and simple definition for the residential (consumer) peak period.**

**a. Do you agree with this definition? Explain your rationale.**

- 1.** Yes, **DWCC** agrees that the 7-11 PM local time is a reasonable and simple definition of peak period for residential Internet users. This timeframe has the highest concentration of real-time video communication, entertainment streaming, and remote socializing. Deaf,

DeafBlind, and Hard of Hearing users rely heavily on video relay services, FaceTime, Zoom, and other video-based communication platforms.

**b. If setting a specific time window is not the most meaningful way to present this information to consumers, is there a cost-effective way to produce localized peak period-related measurements (for example, the continuous 4-hour period when the most residential Internet traffic is observed on an ISP's network)?**

- 2. DWCC** supports the use of localized peak period-related measurements, particularly in rural, northern, and indigenous communities where usage patterns may differ. A cost-effective method would be to anonymously aggregate 4-hour peak periods from passive ISP traffic logs, reflecting actual local network usage without requiring complex data collection. **DWCC** also recommends that this data be publicly disclosed and accompanied by ASL and LSQ summaries to ensure accessibility.

## **Question 2: Typical download and upload speeds**

Many parties consider “typical download and upload speeds” to approximately mean the end-to-end download and upload speeds subscribers should experience most of the time when using the Internet. Commission staff proposes that “typical download and upload speeds during peak periods” could be more clearly defined as the download and upload speed a subscriber will receive during the peak period discussed above when deploying a speed test to an off-net test server in the closest tier one city, at least 95% of the time.

- a. Would you agree with the elements of this proposed definition? Please explain your rationale.**
- 3. DWCC** supports the 95% threshold during peak periods as a meaningful consumer protection benchmark, as it ensures consistency for DDBHH users relying on real-time video communication. Video calls in ASL/LSQ require steady upstream and downstream performance. A 95% uptime definition is more enforceable and consumer-friendly than a vague “average” speed.
- b. Should the CRTC instead define typical download and upload speeds as being the average download and upload speeds subscribers should expect to receive, as opposed to 95% of the time? Are there any limitations or problems with this proposed definition?**
- 4. DWCC** does not support redefining typical download and upload speeds solely on average values as they do not reliably reflect users’ actual experiences, particularly during peak periods. Relying on averages may obscure significant variability, particularly in underserved rural, northern, and indigenous communities, where performance may be inconsistent.

5. Defining typical speeds as those experienced at least 95% of the time provides a more robust and consumer-protective standard. It ensures that users can consistently access advertised service levels, not just under optimal conditions. This approach is more transparent and better aligned with the expectations of end users.
- c. **If you have a definition for “typical download and upload speeds” that differs significantly from the two presented above, please propose it and explain the rationale behind this alternative definition.**
6. **DWCC** proposes defining “typical download and upload speeds” as the minimum speeds that users can reasonably expect to receive at least 80% of the time during peak hours over a monthly period. This definition focuses on the periods that matter the most to consumers, when networks are under the greatest demand, while remaining achievable for ISPs. It provides a realistic and consumer-centric measure of service quality and better captures disparities in performance, particularly in rural, northern, and indigenous regions, where peak-hour degradation is more common.
- d. **If a more flexible definition is chosen, how should ISPs be held to account if subscriber experience differs from reported typical download and upload speeds?**
7. **DWCC** believes that if a more flexible definition of typical speeds is adopted, it is essential to establish clear accountability measures to ensure that users are not misled. ISPs should be required to regularly validate reported typical speeds using independent variable data, including performance during peak hours. Regulatory audits and third-party testing should be used to monitor compliance.
8. Where consistent discrepancies between reported and actual user experiences are identified, particularly in rural, northern, indigenous, or underserved areas, ISPs should be required to disclose the variance, offer remediation, and submit a corrective action plan to the Commission. This ensures transparency, protects consumers, and maintains public trust in reported metrics.
- e. **Parties have mentioned that the various technical elements of this hearing (such as landing on a definition for typical download and upload speeds and determining a measurement methodology) should be referred to the CRTC Interconnection Steering Committee (CISC). What are the potential benefits and risks of this approach?**
9. **DWCC** believes that referring technical issues to the CRTC Interconnection Steering Committee (CISC) can leverage industry expertise and promote consensus on implementable standards. However, this approach risks lengthy delays and may underrepresent consumer and rural, northern, and indigenous community interests. To mitigate these risks, the Commission should ensure balanced representation, maintain oversight, and set clear timelines to protect consumer interests and promote timely outcomes.

- 10.** DWCC emphasizes the importance of the inclusion of DDBHH members on the CISC working groups to ensure that DDBHH views are represented, as video calling remains a prioritized form of communication. DWCC members are qualified to participate with their expertise on priority issues for consensus on standards, and their experience

### **Question 3: Right amount of information to be provided to consumers.**

**On the record of this hearing, different parties have argued for different information to be made available to consumers.**

**Please indicate which of the following types of information should be provided to consumers by sorting them into the provided table, and add any additional information that you think should be included. Furthermore, please do not add more rows to the provided table.**

| <b>Most Relevant</b>                                                              | <b>Somewhat Relevant</b>                                                                | <b>Less Relevant</b>                 |
|-----------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------|--------------------------------------|
| Quality of Service (QoS)                                                          | Peak period                                                                             | Minimum guaranteed download speed    |
| Technology type                                                                   | A graph that shows the measured hourly average speeds                                   | Typical download                     |
| Minimum guaranteed upload speed                                                   | A QR code for additional information                                                    | Typical upload speed                 |
| Maximum upload speed as advertised                                                | A line referencing the Commission for Complaints for Telecom-television Services (CCTS) | Maximum download speed as advertised |
| All-in prices, before or after promotional discounts                              |                                                                                         |                                      |
| A link to American Sign Language (ASL)/ Langue des signes québécoise (LSQ) videos |                                                                                         |                                      |

11. **DWCC** believes that Quality of Service (QoS) is the most relevant type of information to provide to consumers. For DDBHH consumers, who often rely heavily on video calls for both everyday communication and emergencies, consistent and reliable service quality is essential. High-quality video is not optional - it is critical for communication access.
12. Metrics such as latency, jitter, and packet loss directly impact the usability of these services. **These must be kept as close to zero as possible to support reliable, real-time video communication.** Ensuring transparency around QoS is therefore not only a technical issue but a matter of accessibility, equity, and safety.
13. Poor QoS can mean the difference between accessible communication and exclusion for DDBHH consumers. Transparent reporting and minimizing network disruption are essential to **communication equity** comparable to that of voice call users. This is not just a technical concern - it is a matter of communication equity, accessibility, and public safety.

#### Question 4: Iconographic representations

Some parties have suggested that, should a broadband label were to be required, some form of contextualizing information be included. Others were concerned that too much information would clutter a “consumer broadband label” and take away from the clarity of the information it is trying to convey. One way this concern may be addressed is to use icons to represent activities, like gaming, schoolwork, work, streaming music, and streaming audio-visual content.

a. **Would this be beneficial to consumers? Explain your rationale.**

14. **DWCC** strongly believes that including icons to represent common online activities would be highly beneficial. DDBHH consumers, visual indicators can make broadband labels more accessible and easier to understand. Icons provide an intuitive, language-independent way to communicate how a plan supports specific uses such as video calling, streaming, remote work, and other essential online activities.

b. **Is there a standard set of icons that could be used to represent different activities?**

15. While there is currently no universally mandated set of icons for broadband labels, a standardized and intuitive set could be developed to represent activities like video calling, streaming, gaming, schoolwork, and remote work.
16. **DWCC** recommends that the Commission endorse or develop a consistent set of accessible icons to enhance consumer understanding. This process should include meaningful consultation with DDBHH communities and other equity-seeking groups to ensure that icon design and usage meet diverse accessibility needs. Icons should follow best practices for

visual clarity, including appropriate contrast, sizing, and the inclusion of alternative text for screen readers.

- c. **If there isn't a standard set of icons, would it be a viable solution for the Canadian Telecommunications Association (CTA) to coordinate industry efforts in this regard so that there is no duplication of efforts and an industry standard set of icons?**

**17. DWCC** believes it would be a viable approach for the CTA to coordinate industry efforts to develop a standard set of icons, provided the process is transparent, inclusive and avoids duplication. To ensure the icons are truly accessible and meaningful, this effort must involve meaningful consultation with DDBHH consumers and other equity-seeking groups. While CTA can play a coordinating role, the Commission should retain oversight to ensure that the resulting icon set meets national accessibility standards and serves the public interest.

## **Question 5: Critical Information Summary (CIS)**

**The possibility of making the CIS required by the Internet Code more persistently and readily available, such as through the consumer portal of the ISP, was raised at the hearing by multiple parties.**

- a. **Please comment on this proposal, including cost and feasibility, and elaborate on your position. For ISPs without a consumer portal, is an equivalent obligation (such as emailing the CIS within 24 hours of a request) feasible?**

**18. DWCC** supports the proposal to make the CIS more persistently and readily available, including through consumer portals where they exist. Easy, simple, consistent, and accessible access to the CIS is essential for transparency and enables all consumers, including DDBHH users, to understand and compare service terms. This should include ASL/LSQ video formats for DDBHH users to review before making decisions. Centralizing the CIS accessible in a clearly visible location reduces confusion, supports informed decision-making, and strengthens provider accountability.

- b. **Similarly, if the Commission were to impose a “consumer broadband label”, should it be persistently and readily available in a similar manner? Should it be included in the CIS? Please elaborate on your positions.**

**19. DWCC** fully supports making the broadband label persistently and readily available, similar to the CIS. It should be clearly accessible through customer portals or alongside billing and service details. While the label and CIS serve different purposes, they should be presented together or in close proximity. The label must be accessible, including ASL/LSQ videos and screen reader-compatible formats, to ensure all consumers, especially DDBHH and equity-seeking groups, can make informed choices.

c. **Finally, if a “consumer broadband label” were to be required, there may be challenges for consumers to keep track of the information found in a “consumer broadband label” versus what is already provided in a CIS. How would you suggest that the Commission address this situation?**

**20. DWCC** submits that to avoid confusion between the proposed consumer broadband label and the CIS, the Commission should ensure the two documents are clearly linked, visually distinct, and presented together in the same location.

**21.** Each document should have a defined purpose: the broadband label for a quick, standardized, easy-to-read snapshot for comparing technical performance, pricing, and key service features. The CIS should continue to be a contract-specific summary where key terms, fees, limitations, and conditions are clearly outlined and tied to the specific service agreement.

**22.** Clear headings, consistent formatting, and accessible layouts, including ASL/LSQ summaries and screen reader compatibility, will help consumers, including DDBHH users, to navigate the information more easily. This also includes having it in plain language and accessible formats being available upon request. This will uphold the Commission’s obligations under the Accessible Canada Act and its commitment to universal design.

**23.** Ensuring that the broadband label and CIS are co-located and functionally differentiated will support informed decision-making.

#### **Question 6: Application to smaller ISPs**

**The application of or exemption from any new rules to small providers and wholesale-based competitors was a topic of discussion during the hearing.**

a. **As an alternative to outright exemption, should smaller players still be subject to providing standardized network metrics (such as latency, jitter, packet loss, etc.), but given more flexibility as to how they measure to obtain these metrics, and, if so, what form of flexibility would be appropriate?**

**24. DWCC** does not support full exemption of smaller providers or wholesale-based competitors from reporting standardized network metrics. All consumers, regardless of provider size or location, deserve access to accurate and comparable information about service quality.

**25.** However, **DWCC** supports allowing smaller providers greater flexibility in how they collect and report these metrics. This approach maintains transparency and consumer protection while acknowledging the limited resources of smaller providers. Any flexibility granted should still ensure data is reliable, accessible, and reflective of users’ real-world experiences, particularly in rural, northern, indigenous communities, and any other underserved communities where smaller providers often operate.

**b. With respect to typical download and upload speeds, should smaller players still be subject to providing measurements on typical download and upload speeds, but given more flexibility as to how they measure typical download and upload speeds, and, if so, what form of flexibility would be appropriate?**

**26. DWCC** believes that smaller players should still be required to provide measurements on typical download and upload speeds, as all consumers deserve transparency and comparability regardless of provider size. This information is essential for assessing Quality of Service and overall network performance.

**27. DWCC** supports offering flexibility in how smaller players conduct these measurements, provided it reduces administrative burden without compromising data accuracy or consumer protection. This flexibility is especially important for consumers in rural, remote, northern, and indigenous communities, areas where smaller providers often operate, who rely on trustworthy information to make informed choices about their internet service.

**c. How should they be held accountable for reported performance metrics where flexibility has been given in how they have been measured?**

**28. DWCC** believes that where flexibility is granted in how smaller providers measure and report publicly the metrics, either on providers' and/or CRTC's website, accountability remains essential to maintain trust and protect consumers. Providers should be required to document and disclose their chosen measurement methodology, including its limitations.

**29.** The Commission should establish clear baseline standards for data integrity, regardless of the method used, and retain the ability to audit or request verification if discrepancies arise. Furthermore, providers should immediately correct inaccurate data or misleading information and update consumers if performance claims are not met. This ensures that flexibility does not come at the expense of transparency or consumer protection, particularly in rural, northern, and indigenous communities.

## **Question 7: Wholesale**

**Wholesale ISPs have expressed concern over their ability to provide consumers with, or be held accountable for, network metrics that, in substantial part, only their upstream service suppliers have the ability to control.**

**a. If you are a wholesale ISP, do you find yourself in this situation? If so, would the inability for you to perform passive network measurements on your upstream service suppliers be a hindrance in light of the proposed definition of typical download and upload speeds above?**

**30.** Not Applicable to DWCC.

**b. How would existing arrangements and procedures between wholesale ISPs and their upstream providers be impacted by the introduction of the labelling requirement and any related accountability requirements? Will complaint mechanisms need to be revamped?**

**31.** While **DWCC** is not party to the commercial arrangements between wholesale ISPs and their upstream providers, **DWCC** is concerned about the potential accountability gaps that could undermine consumer trust. The introduction of broadband labelling and performance measurement requirements should not lead to confusion or finger-pointing between providers when service quality falls short.

**32.** **DWCC** urges the Commission that it must be clear to consumers who is responsible for performance and how to file a complaint. This clarity is especially important for DDBHH consumers, who require accessible and barrier-free communication channels to navigate complaint and support systems effectively.

**c. Are there any implications on existing Commission policies or requirements with regard to wholesale services?**

**33.** **DWCC** recognizes that introducing broadband labelling and accountability requirements may necessitate reviewing existing Commission policies concerning wholesale services to ensure alignment and avoid conflicting obligations. However, any new measures must enhance transparency, accessibility, and consumer protection without imposing undue burdens that could reduce service availability in wholesale-dependent markets.

**34.** **DWCC** urges the Commission to ensure that wholesale service requirements remain clear and that consumers, including those in underserved, rural, northern, indigenous, and DDBHH communities, continue to receive reliable information and have access to effective, accessible complaint mechanisms, regardless of whether their provider operates on a wholesale or facilities-based model. Equity and accessibility must be central considerations to ensure all Canadians can make informed choices and have their concerns addressed fairly.

## **Question 8: Improving on the Federal Communications Commission (FCC) labels**

On line 520 of the hearing transcript, Cogeco Connexion Inc. (Cogeco) mentioned during their appearance at the hearing that only 2% of their American online consumers navigated to the FCC-required labels Cogeco provides on their website, as a proxy for the usefulness of the FCC-required label.

Assuming that this measurement is an accurate proxy for the labels' usefulness, is there any way to make them more useful or otherwise improve on their consumer adoption?

- 35. DWCC** questions whether Cogeco's reported 2% engagement with FCC-required broadband labels accurately reflects their overall usefulness and suspects that the current approach may not effectively reach or engage most users. To improve their impact, broadband labels should be made more accessible, visible, and easy to understand. Including a plain-language glossary would further support consumer understanding by clarifying technical terms and key metrics.
- 36. DWCC** recommends integrating labels directly within billing statements, customer portals or at the point of sale to increase visibility and consumer engagement. Incorporating icons that represent common online activities would assist consumers in quickly and easily understanding how the reported speeds and service quality relate to their everyday usage. Additionally, consumers should be able to provide timely feedback to share what information they find useful or confusing, enabling continuous improvement.
- 37.** Furthermore, **DWCC** believes that outreach and education campaigns tailored to diverse communities, including DDBHH, would increase awareness and understanding. Ensuring that labels and supporting materials are fully accessible via ASL/LSQ videos and screen reader compatibility is critical for equitable adoption.

## Closing Remarks

- 38. DWCC** urges the Commission to prioritize accessibility, transparency, and equity in the implementation of broadband labelling. Ensuring that DDBHH consumers can access, understand, and rely on Internet performance information is essential to fulfilling the goals of the Internet Code and the 2023 Policy Direction.
- 39.** Above all, the Commission must **recognize and support video-based communication as equivalent to voice calling**, both in policy and in practice. For DDBHH consumers, video communication is not optional; it is the primary, and often only, accessible means of real-time communication. Ensuring that video is treated on par with voice is essential to ensuring communication equity, securing access to essential services, and enabling full participation in society.
- 40.** Should the Commission have any further questions, the DWCC will be pleased to respond.

Respectfully submitted,

Jeffrey Beatty

Chairperson, Deaf Wireless Canada Consultative Committee – DWCC

Président, Comité pour les Services Sans fil des Sourds du Canada – CSSSC

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