



Deaf Wireless Canada Consultative Committee

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VIA EMAIL DISTRIBUTION and GC KEY

September 5, 2025

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

Reference: [1011-NOC2024-0318](#)

Dear Mr. Morin,

Re: [TNC CRTC 2024-318-4](#) - Making it easier for consumers to shop for Internet services -
Final Reply Comments of the Deaf Wireless Canada Consultative Committee (DWCC)

Introduction

1. The Deaf Wireless Canada Consultative Committee (**DWCC**) files this final reply to address issues raised in interventions and responses to requests for information in Telecom Notice of Consultation CRTC 2024-318. DWCC represents Deaf, DeafBlind, and Hard of Hearing (DDBHH) Canadians and advocates for telecom services that are affordable, transparent, and accessible.
2. **DWCC** emphasizes that the Commission must ensure that any framework for consumer broadband labels, disclosures, and critical information summaries is standardized, enforceable, and **fully accessible**.

Cross-cutting Themes

3. DWCC highlights five essential requirements for consumer protection and accessibility:
 - a. **Standardized Broadband Label:** Plain language, clear comparability, mandatory inclusion of key metrics (all-in prices, typical speeds, technology type, minimum guarantees, data allowances, contract term).

- b. **Accessibility Requirements:** Labels available in ASL/LSQ video formats, WCAG-compliant portals, and plain-language text.
 - c. **Machine-Readable Data:** ISPs must provide data in open, machine-readable formats so that third-party comparison tools can empower consumers.
 - d. **Promo vs. Regular Pricing:** Transparent side-by-side display of promotional and post-promotional prices, including duration and conditions.
 - e. **Enforcement & Audits:** Independent audits, public scorecards, and penalties for non-compliance to ensure ISPs provide accurate information.
4. The five cross-cutting themes outlined above reflect DWCC's core requirements to ensure that broadband labels are transparent, accessible, and enforceable in practice. They establish the foundation for a consumer protection framework that addresses both regulatory objectives and the lived realities of consumers, particularly those who are Deaf, Deaf-Blind, and hard of hearing.
 5. In the following section, DWCC's responses to Questions 1 through 8 build on these requirements, applying them to the Commission's specific questions and demonstrating how these principles can be operationalized to achieve meaningful outcomes.

Responses to Q1–Q8

DWCC's Response to Q1: Peak Periods

6. While DWCC previously aligned with others on a 7:00–11:00 pm peak period using VRS, DWCC now defines peak periods as 6:00–11:00 pm local time, with flexibility for rural and Indigenous communities. This adjustment reflects the fact that many Deaf individuals, facing communication challenges at work, often wait until they are home to make video calls using their home internet. Accordingly, it would be valuable to investigate peak VRS usage hours with the CAV, as Deaf users from our Committee have reported being in the queue on the phone waiting as caller number 10 from as early as 4:00 pm until the end of the day.
7. DWCC recommends CRTC do a Request For Information to the CAV to get the data about calling for the final determination of what would be considered peak

times for usage of the internet, inclusive of DDBHH Canadians' phone call usage of VRS.

8. DWCC strongly recommends that data reporting must be provided in accessible formats (ASL/LSQ video, plain-language summaries).
9. DWCC supports the Commission's baseline window, noting broad consensus across parties. DWCC further urges localized reporting where network performance differs.
10. Having established peak usage periods, it is equally important to consider the minimum guaranteed download and upload speeds during these periods, as these directly impact the quality of video communication for DDBHH Canadians.

DWCC's Response to Q2: Typical Download and Upload Speeds

11. DWCC supports the adoption of the 95% off-net Tier 1 city definition with a requirement that ISPs provide minimum guaranteed speeds during peak periods (80% baseline), with audits and consumer redress.
12. DWCC observes that advocacy groups and CCTS strongly support the 95% definition while the carriers oppose it, citing cost. DWCC stresses that consumer protection outweighs cost claims and that the Commission already set precedents for Quality of Service (QoS) in [Decision 2018-241](#).
13. In addition to network performance metrics, transparency of consumer information is critical to ensure users can make informed choices about broadband services that meet their communication needs.

DWCC's Response to Q3: Consumer Information

14. DWCC urges the Commission to include all-in prices, typical and minimum guaranteed speeds, technology type, and quality-of-service metrics (latency, jitter, packet loss).
15. Including QoS metrics in consumer information is essential, as they directly affect the usability of services for DDBHH individuals relying on video communications.

16. Video calling is the primary means of communication for Deaf, Deaf-Blind, and Hard of Hearing individuals; latency, jitter, and packet loss are critical factors for ensuring uninterrupted video communication and full accessibility.
17. DWCC observes that carriers seek to limit labels to minimal metrics; DWCC disagrees with this approach, as it fails to meet consumer needs—particularly because QoS metrics are critical for video communications used by Deaf, Deaf-Blind, and Hard of Hearing (DDBHH) community members.
18. Alongside clear metrics, visual accessibility features, such as standardized icons, are necessary to ensure all users—including DDBHH and language-minority consumers—can easily understand service characteristics.

DWCC's Response to Q4: Icons

19. DWCC proposes a requirement for standardized, accessible icons co-developed with disability and Deaf community members. DWCC further recommends pairing these icons with plain text and ASL/LSQ.
20. DWCC notes that advocacy groups and CCTS support the concept of icons, while the carriers oppose. DWCC stresses icons are not “marketing junk” but accessibility features for DDBHH and language-minority consumers.
21. Building on the need for standardized, accessible icons, it is equally important that all consumer information—whether conveyed through icons, text, or other formats—is consistently available and integrated into the service experience. Persistent, clearly labelled information ensures that DDBHH and other consumers can make informed choices, compare services effectively, and resolve disputes when necessary. The use of icons and comprehensive labels is therefore a complementary measure to enhance transparency and accessibility in broadband services.

DWCC's Response to Q5: CIS / Broadband Labels

22. DWCC advocates for a mandate that labels are persistently available before and after sale, incorporated into the CIS, and thus part of the contractual obligation.
23. DWCC recognizes that CCTS and advocacy groups support persistent availability, while the carriers oppose, citing costs as a rationale. DWCC stresses that persistent labels empower consumers and aid in dispute resolution.

24. Having established the need for persistent, accessible broadband labels, it is equally important to ensure that these requirements apply consistently across all service providers. The benefits of clear, standardized information for consumers should not be limited by the size of the ISP, as small providers' customers are equally entitled to transparency, accessibility, and consumer protection.

DWCC's Response to Q6: Application to Small ISPs

25. DWCC underscores that there are no exemptions and that all ISPs must provide standardized labels, with flexibility only in methodology (sample sizes).
26. DWCC notes that small ISPs requested exemptions; however, DWCC insists and emphasizes that consumers deserve equal protection regardless of provider.
27. Ensuring that all ISPs, regardless of size, provide standardized labels highlights the broader need for accountability throughout the broadband service chain. Just as small ISPs must be transparent with consumers, wholesale ISPs also play a critical role in enabling accurate reporting and disclosure, as downstream providers rely on their data to meet labelling and consumer protection requirements.

DWCC's Response to Q7: Wholesale ISPs

28. DWCC affirms that wholesale ISPs must be accountable to consumers. It is the view that wholesale arrangements must include data-sharing obligations so downstream providers can disclose accurate metrics.
29. DWCC recognizes that carriers resist wholesale transparency while the consumer groups insist on accountability. With this, DWCC stresses clear lines of responsibility and disclosure.
30. Accountability and transparency in wholesale arrangements directly support the effectiveness of consumer-facing labels. Ensuring that downstream providers have accurate data from wholesale ISPs lays the foundation for labels that are not only visible but also meaningful. Building on these measures, attention must now turn to improving the design, accessibility, and education surrounding broadband labels to maximize their utility for consumers.

DWCC's Response to Q8: Improving on FCC Labels

31. DWCC rejects Cogeco's 2% claim as an inadequate proxy for label ineffectiveness. Canadian broadband labels must be **visible, accessible, and reinforced through targeted education campaigns to ensure meaningful consumer use.**
32. The FCC found that visibility, not utility, was the main barrier. DWCC stresses that well-designed labels, coupled with consumer education, are critical to ensuring widespread adoption.
33. Taken together, the experience of the FCC and the evidence in this proceeding underscore that labels are only effective when they are both visible and supported by consumer education. The measures proposed by DWCC—ensuring accessibility, clarity, and reinforcement through education—complement the broader need for standardized, enforceable consumer protections. These principles form the foundation for the Commission's final determination on broadband labels.

Conclusion

34. The record demonstrates a clear divide: advocacy groups and the CCTS support standardized, enforceable, and accessible consumer labels, whereas carriers and some small ISPs oppose prescriptive standards, citing cost and resisting accountability. DWCC urges the Commission to uphold the public interest by ensuring that broadband labels are transparent, accessible, and enforceable, thereby enabling all Canadians, including DDBHH and language-minority communities, to make informed decisions.
35. As emphasized in paragraph 39 of our RFI Reply dated August 7, 2025, DWCC urges the Commission to unequivocally recognize video-based communication as fully equivalent to voice calling, both in policy and in practice. For Deaf, Deaf-Blind, and Hard of Hearing (DDBHH) consumers, video is not optional—it is the primary, and often sole, means of real-time communication. Ensuring that video is treated on par with voice is imperative to uphold communication equity, guarantee access to essential services, and enable full participation in Canadian society.
36. DWCC expresses its gratitude to the Commission for the opportunity to submit these reply comments.

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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