



Deaf Wireless Canada Consultative Committee

% 405-15 Wellings Dr. Picton Ontario K0K 2T0
E-mail: www.deafwireless.ca X: [@DeafWirelessCAN](https://twitter.com/DeafWirelessCAN)

VIA EMAIL DISTRIBUTION and GC KEY

August 18, 2025

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

Reference: Public record: [1011-NOC2025-0002](#)

Broadcasting Notice of Consultation CRTC 2025-2

Subject: The Path Forward - Working Towards a sustainable Canadian broadcasting system

Dear Mr. Morin,

On behalf of the Deaf Wireless Canada Consultative Committee (DWCC), please find enclosed our responses to the Commission's Requests for Information (RFIs) issued on 23 July 2025 in connection with Broadcasting Notice of Consultation CRTC 2025-2, The Path Forward – Working Towards a Sustainable Canadian Broadcasting System.

DWCC is committed to ensuring that the perspectives of Deaf, DeafBlind, and Hard of Hearing (DDBHH) communities are fully represented in the development of a modernized broadcasting framework. Our responses address Questions 30 through 33 on data collection related to equity-deserving groups, ownership, and diversity reporting. We emphasize the importance of embedding accessibility and Deaf-led perspectives in the Commission's data collection processes to ensure inclusivity and accountability.

We thank the Commission for the opportunity to contribute and look forward to continuing to engage in this important proceeding.

Respectfully submitted,

Jeffrey Beatty
Chairperson
Deaf Wireless Canada Consultative Committee (DWCC)

Q30. Data Collection on Equity-Deserving Groups – Does your organization collect information about equity-deserving groups?

If yes, please answer the following:

a) Data: What types of data related to equity-deserving groups does your organization currently collect, if any?

- 1.** DWCC does not currently collect data on equity-deserving groups. However, it monitors participation of Deaf, DeafBlind, and Hard of Hearing (DDBHH) individuals and organizations in regulatory processes, accessibility initiatives, and telecom or broadcasting policy consultations. This includes tracking barriers encountered, accommodations requested, and existing accessibility gaps. DWCC also conducts nationwide surveys tailored to specific proceedings to gather relevant data.

b) Definition: How does your organization define “equity-deserving groups,” and which specific groups are included in that definition in your data collection?

- 2.** DWCC defines *equity-serving groups* as those who experience structural barriers in telecommunications and broadcasting systems, including:
 - a. DDBHH communities
 - b. Indigenous Peoples
 - c. Persons with disabilities
 - d. Racialized groups
 - e. 2SLGBTQIA+ communities
 - f. Women and gender-diverse persons

c) Guidelines: What are some guidelines or protocols put in place for the collection and publication of such data?

- 3.** DWCC emphasizes that data collection must:
 - a. Respect cultural and linguistic identity (ASL and LSQ users)
 - b. Be gathered with free, prior, and informed consent
 - c. Be available in accessible formats including plain language and ASL/LSQ videos

d) Privacy: Several parties have expressed concern about privacy and sensitivity issues with regards to collecting information about the diversity of ownership. How could these concerns be mitigated?

4. Privacy concerns should be mitigated by collecting only aggregate and anonymized data whenever possible, ensuring confidentiality, and allowing participants to opt-in or decline providing sensitive demographic data.

e) Challenges: If applicable, what challenges has your organization encountered while trying to collect data on equity-deserving groups and what steps have been taken to counter them?

5. DWCC believes that there is a lack of standardized definitions of equity-deserving groups across government bodies. Additionally, chronic underfunding of accessibility-focused organizations has limited their capacity to collect, analyze, and report disaggregated data. The small population size of some groups further increases the risk of identification, compounding privacy concerns.

Q31. Third party: Should the Commission initiate the collection of ownership data on equity-deserving groups?

a) If so, should the Commission collect the information itself, or should the task be assigned to a third party?

6. DWCC supports the Commission in initiating ownership and equity data collection. However, relying solely on industry self-reporting risks inconsistent and incomplete data. To ensure accountability and data integrity, stewardship should be assigned to a third party with demonstrated accessibility expertise.

b) In the latter case, which third party would be best suited, and why?

7. A third-party approach ensures independence, reduces conflicts of interests, and provides credibility, but must incorporate Deaf-led and disability-led organizations. Potential stewards could include Accessibility Standards Canada (ASC) or a coalition of community-based organizations, such as DWCC.

Q32. Data Collection on Equity-Deserving Groups by the Commission: Several parties have expressed interest in the Commission or a third party collecting and publishing data to assess the diversity of ownership in broadcasting.

a) Equity-Deserving Groups: Which communities or equity-deserving groups should be considered to monitor the evolution of diversity in ownership?

- 8.** The equity-deserving groups that should be monitored to track the evolution of diversity in ownership include the Deaf, DeafBlind, and Hard of Hearing (DDBHH) communities, Indigenous Peoples, persons with disabilities, racialized communities, 2SLGBTQIA+ communities, women, gender-diverse persons, and other communities that experience systemic barriers in broadcasting and telecommunications.

b) Position: Which position having decision-making power should be considered?

- 9.** The positions that should be considered in monitoring diversity in ownership are those with decision-making authority, including executive leadership roles such as CEO, President, and COO, as well as members of the Board of Directors.

c) Information on Control and Ownership: For entities with multiple shareholders and publicly traded companies, controlled by their board of directors, how could the Commission effectively collect their data?

- 10.** c.i. For entities with multiple shareholders and publicly traded companies, the Commission could collect data by requiring standardized equity and diversity disclosure reports at all levels of ownership, similar to annual shareholder filings, but specifically tailored to diversity and accessibility representation.

c.ii. Yes, the Commission should collect data about Boards of Directors, as they play a central role in governance and oversight.

c.iii. Yes, the Commission should collect information on CEOs, as they are the ultimate decision-makers responsible for corporate accountability, culture, and inclusion policies.

d) Should the Commission collect data about the boards of directors?

- 11.** Yes, data should be collected at all levels of ownership (licensees, parent corporations, controlling shareholders) because concentration at upper levels can negate diversity that appears at lower levels. A complete picture of ownership is necessary to assess true representation and influence.

e) Should the Commission also collect information about the CEO?

- 12.** Challenges include resistance from industry citing privacy or administrative burden, inconsistencies in definitions of equity-deserving groups, and the risk of tokenism in reporting. These can be addressed through clear definitions, mandatory standardized reporting frameworks, strong privacy safeguards (anonymized/aggregate data), and enforcement measures tied to registration or licensing obligations.

f) Ownership: Should data be collected on all levels of ownership (i.e., licensee, parent corporations), and why?

- 13. f.i.** Yes, the Commission should collaborate with organizations such as the Canadian Media Fund (CMF) to collect relevant information, but it should also partner with accessibility and equity-focused organizations to ensure inclusion of underrepresented voices.

f.ii. The best-positioned organizations would be those with independence, credibility, and experience in equity monitoring, such as Accessibility Standards Canada, the Indigenous Screen Office, or a coalition including DDBHH-led organizations like DWCC.

f.iii. Safeguards should include strict privacy protection for small communities, accessible data formats, third-party oversight to prevent bias, and transparent publication of aggregate results. The information collected should include representation across leadership, ownership, governance, and equity participation, disaggregated where possible by disability, linguistic identity, gender, and race.

g) Challenges: What challenges can you see with this proposal, and how could they be addressed?

- 14.** The challenges with this proposal include resistance from industry stakeholders who may cite administrative burden or confidentiality concerns, inconsistencies in the definitions of equity-deserving groups across sectors, and the heightened risk of re-identification for small populations such as Indigenous Deaf communities. These challenges can be addressed by establishing clear and standardized definitions, implementing mandatory but streamlined reporting requirements, anonymizing and aggregating sensitive data, and ensuring strong privacy safeguards. Additional support should also be provided to smaller organizations and equity-deserving communities to build capacity for meaningful participation in the reporting process.

Q33. Point of Contact: In order to gather data for evaluating the diversity of ownership in broadcasting, which individual within a company or entity would make the most suitable point of contact to report the data?

- 15.** The most suitable point of contact within a company or entity to report diversity of ownership data should be a Senior Accessibility Officer or a Diversity and Inclusion Officer, since these roles are designed to ensure accountability for equity and accessibility outcomes. Where such positions do not exist, the responsibility should fall to the Chief Executive Officer (CEO) or President, as ultimate accountability for diversity and accessibility must rest with top leadership. This approach ensures that reporting is overseen by individuals with both authority and responsibility to act on the findings.

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