



Deaf Wireless Canada Consultative Committee

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VIA EMAIL DISTRIBUTION and GC KEY

February 24, 2025

Mr. Marc Morin

Secretary-General

Canadian Radio-telecommunications and Telecommunications Commission (CRTC)

sec-gen@crtc.gc.ca

and

The CRTC Public Hearing Team

Public Hearings, Canadian Radio-television and Telecommunications Commission (CRTC)

Ottawa, ON K1A 0N2

hearing@crtc.gc.ca

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

Re: Intervention to participate in BNC CRTC 2025-2

Dear Secretary General,

1. The Deaf Wireless Canada Consultative Committee - Comité pour les Services Sans fil des Sourds du Canada (DWCC - CSSSC or "**DWCC**"), hereby submits its intervention and declares its wish and interest in participating in the proceeding, ***The Path Forward - Working towards a sustainable Canadian broadcasting system.***
2. This proceeding, which seeks to modernize the definition of "Canadian program" and address critical issues in Canadian programming, presents a unique opportunity to incorporate sign language accessibility as a core criterion. **DWCC** appreciates the opportunity to participate in this proceeding.
3. **DWCC** recognizes the significance of this consultation in ensuring equitable and inclusive policies for the diverse communities served by Canadian broadcasting, including the Deaf, Deaf-Blind, and Hard-of-Hearing (DDBHH) communities.

4. **DWCC** appreciates the opportunity to participate in this proceeding and recognizes the significance of this consultation in ensuring equitable and inclusive policies for the diverse communities served by Canadian broadcasting, including DDBHH communities.

About our Committee

5. **DWCC** advocates for the full inclusion of diverse members within the Canadian DDBHH community in Canadian society. The spectrum of DDBHH life experiences, including those that are Indigenous and 2SLGBTQIA+, and range from those with cognitive delay or have neurodiversity, immigrants learning English or French as a second language, those with various degrees of hearing loss, those with the unique “double” disability as Deaf-Blind, and finally native ASL/LSQ users. Additionally, **DWCC** supports that Indigenous have the right to ask for support, including requesting Indigenous Sign Language interpreters. When **DWCC** writes DDBHH, it is inclusive of all those with intersectional identities.
6. **DWCC's** mandate is to advocate for accessible wireless communications equity for DDBHH Canadians, including but not limited to:
 - a. Cost-reasonable accessible wireless data plans for ASL and LSQ users for two-way video calls.
 - b. Accessible industry-wide promotions of wireless services and products.
 - c. Removal of disparities in costs of the same accessible wireless products and services within each company.
 - d. Provision of functional equivalent wireless products and services, including wireless applications (apps).
 - e. Accessible wireless emergency services (including emergency alerts and direct text to 911).
 - f. Nationwide public awareness, education and outreach on currently accessible wireless and mobile communication products and services.

Q1: Should the Commission continue with the approach requiring all key creative positions to be filled by Canadians?

7. The Interviews Report emphasizes a significant gap in the representation of Deaf professionals in key creative roles within the Canadian media industry. Positions such as directors, writers, and showrunners remain largely inaccessible to Deaf individuals, limiting their opportunities to contribute to and shape the narratives being produced. This lack of representation not only affects the diversity of perspectives in media but also perpetuates the marginalization of the Deaf community within the broader entertainment landscape.
8. To address this issue, **DWCC** strongly advocates for a concerted effort to include Deaf professionals in these critical creative positions. By ensuring Deaf individuals are represented in roles that influence the storytelling process, Canadian programming can

foster more inclusive, authentic, and equitable media that reflects the lived experiences and voices of the Deaf community.

Q3: Does the Commission's preliminary view regarding key creative positions ensure Canadian creative control?

9. No, the Commission's preliminary view regarding key creative positions does not necessarily ensure Canadian creative control. While the inclusion of Deaf professionals in key roles is a step toward diversity, the approach may still overlook the broader need for accessibility in the creative process.
10. **DWCC** proposes a more comprehensive solution—integrating accessibility as a key requirement in creative decision-making. This would not only ensure that Deaf professionals are included but also make sure that programs are developed with an inclusive mindset from the start.
11. By embedding accessibility into every stage of creative development, we can guarantee that Canadian programming reflects the country's values of inclusivity, offering authentic and diverse representations of all communities. This approach would safeguard Canadian creative control by ensuring that all voices, including those of the Deaf community, are meaningfully represented and that accessibility is prioritized in the creative decisions that shape the content.

Q4: How should the Commission define the position of a showrunner?

12. A showrunner plays a critical role in shaping the overall vision and direction of a television show, and part of their responsibility should be to ensure accessibility is seamlessly integrated into the creative process. The report highlights a concerning lack of Deaf professionals in media leadership roles, which has resulted in a significant gap in authentic representation and the inclusion of accessible content. As influential decision-makers, showrunners must recognize the *importance of sign language accessibility, not just as an afterthought but as an integral part of the creative vision from the outset*.
13. **DWCC** recommends that the role of the showrunner be explicitly defined to include the responsibility for ensuring both *sign language accessibility and authentic Deaf representation*. This would mean that Deaf characters, stories, and culture are portrayed accurately and respectfully, and that the necessary accommodations—such as sign language interpreters or captioning—are prioritized to allow full access for Deaf audiences. By formalizing this responsibility, showrunners can help foster a media landscape where Deaf individuals not only have the opportunity to be represented but can also engage with the content in a meaningful way.

Q5: Should a showrunner position be occupied by a Canadian?

14. While showrunners must integrate accessibility into their creative vision, **DWCC** further recommends that showrunners be required to ensure the inclusion of ASL and LSQ accessibility within their productions. This responsibility goes beyond simply including Deaf representation on screen—it involves actively supporting and engaging with Canadian accessibility professionals to ensure that sign language services are properly incorporated into the content.
15. By requiring showrunners to work with qualified sign language interpreters and consultants, the industry can guarantee that ASL and LSQ are authentically represented and accessible, enabling Deaf viewers to fully engage with the narrative.
16. This recommendation not only supports the inclusion of Deaf professionals in the creative process but also promotes the growth of the accessibility sector in Canada. By prioritizing this level of accessibility, the Canadian media industry would demonstrate its commitment to inclusivity, ensuring that both Deaf and hearing audiences have equal access to high-quality, diverse programming.

Q6: Should cultural elements be included within the certification framework?

17. **DWCC** emphasizes the importance of recognizing ASL, LSQ, and Indigenous Sign Languages as integral cultural elements within Canadian programming. These sign languages are not simply communication tools; they are rich, distinct languages with their own histories, cultural significance, and communities.
18. By acknowledging and incorporating these sign languages as cultural assets, Canadian programming can offer a more authentic and nuanced representation of Deaf and Indigenous Deaf cultures. This recognition goes beyond mere inclusion of sign language—it involves understanding and respecting the cultural contexts in which these languages thrive. For Deaf individuals and Indigenous Deaf communities, the use of their native sign languages in media is a powerful affirmation of their identity, heritage, and presence in Canadian society.
19. **DWCC** advocates for the integration of ASL, LSQ, and Indigenous Sign Languages into the fabric of Canadian storytelling, ensuring that these languages are not only accessible but are portrayed in ways that reflect their cultural depth and importance. This approach would help Canadian programming to be more inclusive, diverse, and representative of the full spectrum of experiences within the Deaf and Indigenous communities.

Q8: Would the new flexible approach facilitate the exportability and discoverability of Canadian programming?

20. Yes. The report emphasizes that creating ASL and LSQ programming enhances discoverability both in Canada and internationally.

Q10: Should the 80% Canadian content requirement be maintained for key creative positions?

21. Yes, with flexibility for accessibility. Productions involving ASL, LSQ, or Indigenous Sign Languages should receive additional certification points even if they do not meet the 80% Canadian threshold.

Q18: How should expenditures support Canadian programming, particularly news programming?

22. Prioritizing accessible news is crucial, especially in a world where timely and accurate information can have a direct impact on individuals' health, safety, and well-being. The report highlights a significant gap in accessibility, particularly when it comes to urgent news and health information.
23. For Deaf audiences, the lack of ASL/LSQ interpretation and real-time captioning often makes it difficult, if not impossible, to access critical updates during emergencies or health crises. This gap in accessibility means that Deaf individuals are excluded from receiving life-saving information in the same way that hearing audiences do. In times of public health emergencies, natural disasters, or important political developments, this lack of access is not only a disservice but a violation of the principles of equality and inclusion.
24. **DWCC** calls for a concerted effort to ensure that real-time captioning and sign language interpretation are standard features in all urgent news broadcasts, especially those covering health-related topics or emergencies. This is in addition to Deaf broadcasters who use ASL and LSQ. By prioritizing accessible news, we can ensure that all Canadians, regardless of their hearing abilities, have equal access to essential information that affects their daily lives and well-being.

Q23: How should a modernized expenditure framework support Indigenous and equity-deserving groups?

25. Allocate funding to Deaf programming. The report calls for direct funding for Deaf-created content in ASL and LSQ, ensuring that productions hire Deaf professionals.

26. By providing financial backing for ASL and LSQ content, the industry can stimulate the creation of high-quality, culturally relevant media that is both accessible and engaging for Deaf audiences. Furthermore, this investment would help to create a sustainable ecosystem for Deaf creators, enabling them to build careers within the industry and develop stories that resonate with their community. This commitment to funding Deaf-created content is essential not only for promoting inclusivity but also for ensuring that Deaf professionals have the opportunity to shape and lead the narratives they are part of, fostering a more diverse and equitable media landscape.

Q24: What types of programming should be considered risky yet essential?

27. Accessible emergency broadcasts are an urgent and often overlooked need for Deaf communities across Canada. The report underscores the significant gap in ASL/LSQ interpretation during emergency news broadcasts, a deficiency that directly impacts the safety and well-being of Deaf individuals.
28. During critical situations—such as natural disasters, public health emergencies, or national crises—timely access to accurate information is essential. However, without proper ASL and LSQ interpretation, Deaf audiences are left in the dark, unable to receive the same urgent updates and instructions that hearing viewers can access. This gap in accessibility not only puts Deaf people at risk but also perpetuates inequities in public service delivery.
29. The report highlights that while the need for accessible emergency broadcasts is clear, it remains critically underfunded. To address this issue, it is crucial to allocate appropriate resources to ensure that ASL/LSQ interpretation is consistently available in all emergency broadcasts, making real-time information accessible to all Canadians, regardless of hearing ability. Proper funding and infrastructure are necessary to guarantee that Deaf individuals are not excluded in times of crisis, promoting equal access to life-saving information and contributing to the broader goals of inclusivity and public safety.

Q27: Should all broadcasting undertakings, including foreign online services, provide reporting on accessibility measures?

30. **DWCC** strongly recommends that all broadcasters be required to report on their accessibility compliance, with a specific focus on ensuring that Deaf audiences have access to ASL and LSQ interpretation. This recommendation is crucial for holding media organizations accountable and ensuring that accessibility is not an afterthought but a consistent and prioritized element of their programming.
31. By implementing regular reporting, broadcasters would be compelled to evaluate and improve their accessibility practices, ensuring that Deaf individuals are consistently provided with the necessary resources, such as real-time ASL/LSQ interpretation,

captions, and other essential accommodations. This transparency would also allow the public to assess the progress being made in creating more inclusive content and give Deaf communities the confidence that their needs are being met.

32. Moreover, by making accessibility a reporting requirement, broadcasters would be incentivized to invest in more inclusive programming, ensuring that Deaf audiences have equitable access to all types of media, from daily news to entertainment and emergency information. This proactive approach would contribute to a more inclusive and accessible media landscape, fostering broader cultural and social equity.

Q28: Should revenue and programming expenditures be publicly disclosed?

33. The report highlights that funding for accessibility in media, particularly for Deaf audiences, is often unclear or insufficiently allocated, leading to inconsistencies in the availability of essential services like ASL/LSQ interpretation and captioning. This lack of clarity around accessibility funding contributes to the ongoing challenges faced by broadcasters in meeting the needs of Deaf viewers.
34. To address this issue, **DWCC** recommends that all broadcasters be required to publicly report on their accessibility compliance, specifically in relation to Deaf audiences. By making accessibility reporting mandatory, broadcasters would not only increase transparency but also enhance accountability, ensuring that funding for accessibility is being effectively utilized.
35. Public reporting would provide a clear picture of how well broadcasters are meeting the needs of Deaf communities, and where improvements are necessary. This practice would also serve as a powerful tool for advocating for more dedicated funding to support accessibility initiatives, as it would allow policymakers and the public to see the gaps that still exist. With greater accountability through regular reporting, broadcasters would be motivated to allocate sufficient resources for accessibility, leading to more equitable access to media for Deaf individuals across Canada.

Q30: What should be included in production reports?

36. To further strengthen accessibility in media, **DWCC** recommends that accessibility data be included in regular reports from broadcasters. These reports should provide detailed information on the availability of captions, sign language access (including ASL/LSQ interpretation), and the hiring of Deaf professionals within the production process.

Q33: How should the Commission collect data on key creative positions and equity-deserving groups?

37. Self-identification surveys. The report emphasizes that the hiring of Deaf professionals must be tracked.

Q35: Should certain data be presumed confidential?

38. Only financial data, not accessibility information. Public transparency is crucial for ensuring accountability in accessibility efforts.

Q36: What is the best way to measure success in accessibility?

39. **DWCC** emphasizes the importance of tracking and measuring the success of accessibility efforts through clear metrics. Success should be evaluated not only by the quantity and quality of ASL/LSQ programming but also by the increase in the hiring of Deaf professionals across all areas of media production.
40. Monitoring the growth of ASL and LSQ content is essential for understanding the impact of accessibility initiatives and ensuring that Deaf audiences are receiving the representation and services they need.
41. Additionally, tracking the employment of Deaf professionals—whether in creative roles, production, or accessibility services—would provide a comprehensive measure of inclusivity and workforce diversity within the industry. These metrics should be used to assess progress over time, ensuring that accessibility efforts are genuinely effective and lead to meaningful change.
42. By establishing clear benchmarks for the growth of Deaf representation both on screen and behind the scenes, broadcasters can be held accountable for their commitment to creating accessible, inclusive content. This data would provide a solid foundation for continuous improvement, making it easier to identify areas that need further support and resources to ensure that Deaf professionals and audiences are fully integrated into the media landscape.

Final Takeaways:

43. **DWCC's** Interviews Report for 2024-288 provides substantial evidence to answer several of the 60 questions in the CRTC consultation. The most critical focus areas include:
- a. Mandating ASL/LSQ inclusion in the definition of “Canadian program”
 - b. Providing funding for Deaf professionals in key creative roles
 - c. Ensuring urgent news is accessible through sign language interpretation
 - d. Creating an incentive system for accessibility compliance
 - e. Funding a feasibility study for an ASL/LSQ broadcasting platform

Conclusion

44. The inclusion of an **Accessibility Lens** in Canada’s broadcasting framework is both a legal obligation under the Accessible Canada Act and a moral imperative. By

implementing these structural accessibility changes, the CRTC can foster an equitable, sustainable, and inclusive broadcasting system.

45. **DWCC** urges the Commission to integrate our recommendations into the regulatory modernization process.

46. We appreciate the Commission's consideration of our intervention and look forward to engaging in further discussions.

Participation in the Proceeding

1. **DWCC** respectfully requests the opportunity to present these findings and recommendations at the public hearing in Gatineau, Quebec. We request ASL and LSQ interpretation and CART services to ensure full accessibility for our panellists.
2. **DWCC** appreciates the Commission's commitment to accessibility and the inclusion of the DDBHH community in this critical consultation process. We look forward to contributing our insights and participating in the reply phase.
3. **DWCC** appreciates the Commission's consideration of its supplementary Interventions. Should you have any questions, please do not hesitate to contact all of us.

Best regards,

Sincerely,

Jeff Beatty

Chairperson

Deaf Wireless Canada Consultative Committee (DWCC)

Comité pour les Services Sans fil des Sourds du Canada (CSSSC)