**DWCC Oral Hearing Presentation – CRTC 2024-318**

**Telecom Notice of Consultation CRTC 2024-318 – Making It Easier for Canadians to Shop for Internet Services**

**Public Hearing Date: June 10, 2025**

**Duration: 20 minutes | Final Oral Notes**

**Presented by: Jeffrey Beatty, Chairperson, DWCC-CSSSC**
**Lisa Anderson, Past Chair & Consultant**
**Jessica Sergeant, Consultant**

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## 1. Opening Remarks

Good morning/afternoon, Commissioners, Commission staff, and fellow stakeholders. Thank you for the opportunity to appear before you and contribute meaningfully to the Telecommunications Notice of Consultation CRTC 2024-318 proceeding.

DWCC advances for the full inclusion of Deaf, DeafBlind, and Hard of Hearing (DDBHH) Canadians in all aspects of the telecommunications system. Our work is rooted in the principle of **communication equity** and guided by a strong Accessibility Lens, a framework that ensures accessibility is integrated from the start, not added as an afterthought.

## 2. Accessibility Lens

### *Definition*

The Accessibility Lens[1] is a practical tool that helps policy makers and program designers assess how decisions impact persons with disabilities. When applied to internet services, it reveals persistent structural barriers such as inaccessible information, limited customer service, unclear labels, data caps that restrict communication, and inaccessible complaint systems.

### *2023 Policy Direction*

CRTC's 2023 Policy Direction, particularly sections 2(d) and 17(c), mandates the proactive identification and removal of accessibility barriers. These are not aspirational values; they are binding regulatory obligations as ISED recommendation under section 8 of the Telecommunications Act.

### *Accessible Canada Act*

This is reinforced by the Accessible Canada Act (ACA). Under Section 5, American Sign Language (ASL), Langue des signes québécoise (LSQ), and Indigenous Sign Languages (ISLs) are recognized as the primary languages of Deaf people in Canada.

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[1] Accessibility Lens definition: https://www.deafwireless.ca/index.php/terminology/accessibility-lens/

***A Legal Right***
Access to internet services in sign language is a legal right, not a courtesy. Consumer code must embed support for sign languages at every consumer touchpoint, ensuring DDBHH Canadians as equal participants in the digital economy, built into the foundation, not added after the fact.

***Recommendation***
DWCC calls on the Commission to officially recognize and integrate ASL, LSQ, and ISLs across all CRTC's policies and communications. Accessibility must be a regulatory standard.

## 3. Accessible Broadband Labels – Designed for Real Use

DWCC supports a Canadian version of the FCC's broadband nutrition label but only if built in from the start, through a Canadian accessibility lens. Labels must be available at every stage of the consumer journey - plan shopping, selection, support, and complaints.

For the DDBHH community, "shopping" is not just about comparing price and speed. Our core question is: Can this plan support accessible communications? We need to know:

- Can I make a clear video call without throttling or pixelation?
- Will Zoom work smoothly to teach ASL or attend a job interview?
- Can I reach 9-1-1 through Video Relay Services without freezing or dropped calls?

DWCC calls for broadband labels that are:

- Visual and icon-based
- Delivered in ASL and LSQ via QR codes or embedded video
- Written in plain language
- Compatible with screen readers and tactile devices

Labels must reflect real-world usability, not just technical specs. Consumers need clarity like:

- "✓ Accessibility Plans"
- "✓ Good for three-way simultaneous HD video calls - VRI, VRS"
- "✗ May cause captions to lag during video chat"

DWCC recommends that the Commission mandate the following five key performance metrics on every broadband label:

1. Download and upload speeds (**ACTUAL**, not advertised) - 100 Mbps 100 - 200+ GB/mo for Accessibility
2. Latency (ping)
3. Jitter
4. Packet loss
5. Uptime and reliability

And critically: **NO THROTTLING**. **NO DATA CAPS**. Lag and pixelation are accessibility barriers, not minor inconveniences. Without reliable high-speed service, DDBHH users are shut out of essential communications.

***Oversubscription Ratios***
Oversubscription ratios and low upload speeds do not account for this evolving reality. DWCC urges the Commission to require ISPs to disclose device-load assumptions behind their service offerings, and adopt an Accessibility Lens that reflects the communication needs of modern households, not outdated singular-user assumptions.

## 4. Systemic Accessibility Gaps

There are three key accessibility gaps that still block equitable access:

- Accessibility Plans
- Promotions and Outreach
- Complaint System

### *A. Accessibility Plans*

For many DDBHH consumers, home Wi-Fi is a communication lifeline. They use it to:

- Use Video Relay Services
- Communicate via direct video in ASL/LSQ

Yet today:

- Internet accessibility plans are rare to non-existent
- When they do exist, they're hard to find, poorly labeled, or buried deep on provider websites

**If a plan has data caps or is throttled, basic communication becomes impossible.**

DWCC recommends the Commission require:

- Unlimited, unlimited, high-data internet accessibility plans tailored to DDBHH users
- Clear, easy-to-find information about accessibility features and eligibility
- Plans must be visible, trackable, and built into comparison tools

### *B. Promotions and Outreach*

We hear this all the time: “We held an information session, we provided interpreters, but no Deaf people came. But when you look closer:

- No ASL or LSQ promotions
- No accessible materials
- No promotion within DDBHH networks

The issue isn't a lack of interest. It is a lack of access. Deaf consumers go to stores and:

- Find no interpreter
- No signage in ASL or LSQ
- No mention of available of accessible or discounted plans

If we don't know a plan exists, we can't choose it.

Promotions must be:

- Clearly labeled as accessible or affordable
- Available in ASL and LSQ via video and signage
- Promoted through channels that reach DDBHH communities

So, as we say: *"If you build it, we won't come unless you make it accessible, and tell us in our language."*

### *C. Complaint Systems*

Many in our community do not use the CCTS, not because there are no problems, but because the system is inaccessible.

Current systems assume:

- You can hear
- You can speak
- You can read and write complex English
- You can navigate formal complaint forms and paperwork

That's not the reality for many DDBHH Canadians. If the system isn't built with us in mind, we won't come. Not because we don't care but because we can't participate.

Equity is not achieved by simply offering access. It's achieved when people can actually find it, understand it, and use it, especially in our language and on equal terms.

DWCC are calling for:

- Direct ASL and LSQ video support for complaint intake
- Support for Video Relay Services, live chat, and visual guides
- A 10-day resolution process for accessibility-related complaints

## 5. Regional Equity & Disparities

Broadband performance can vary dramatically between urban, rural, and remote areas. A plan that works in downtown Montreal may be unusable in Nunavut or northern Manitoba.

For DDBHH consumers, these gaps aren't just inconvenient. They are communication cutoffs. When service is poor, video calls fail, Video Relay Services breaks down, and emergency access disappears.

DWCC urges the Commission to:

- Ensure broadband labels include reflect regional performance, not just national averages
- Clearly state the technology type (fibre, DSL, satellite, fixed wireless)
- Provide visual maps and ASL/LSQ explanations to show regional differences

Why this matters:

If a DDBHH consumer chooses a plan based on a national performance label but then finds it unusable in their community, that's not an informed choice. It is a systemic failure.

Geographic equity must be built into every aspect of broadband labeling. When your internet connection is your phone line, your classroom, and your emergency lifeline, reliability is not optional. That's why geographic equity is not just good policy, it is a cornerstone of accessibility.

## 6. Integration into the Internet Code

DWCC urges the Commission to fully integrate the outcomes of this proceeding into the Internet Code without delay, carve-outs, or "guidance-only" language.

Why? Because consistency = access.

DDBHH consumers rely on predictable, enforceable standards to navigate an already complex and often inaccessible telecommunications market.

If critical protections like broadband labels, ASL/LSQ delivery, or performance metrics are treated as optional or "guidance," that creates:

- Confusion
- Unequal treatment
- And ultimately, exclusion by design.

DWCC recommends to the Commission that the Internet Code be amended to include:

- Mandatory, standardized broadband labels for all providers
- Required delivery in ASL/LSQ, plain language, icon-based formats, and screen reader compatibility
- Enforcement mechanisms, not suggestions

A Deaf consumer choosing a plan based on a label, only to find out later that the provider wasn't required to follow the same rules. That's not consumer protection. That's systemic failure.

Clear, enforceable inclusion in the Internet Code ensures accessibility is not a patchwork, but a uniform standard for equity across the industry.

DWCC thanks CTA for producing ASL and LSQ videos for the Wireless and Internet Codes. To boost accessibility and reuse, especially on telecom websites, DWCC urges editing these into short, terminology-specific clips. The refusal to provide ASL/LSQ translations for CRTC 2024-293 to 295 hindered outreach and use within surveys. **Individual short clips instead of playlists** would improve community engagement and reduce duplication across stakeholders.

## 7. Conclusion

DDBHH Canadians are not asking for special treatment. We are asking for equal access, intentionally designed with accessibility at the centre.

DWCC's major recommendation to CRTC is to have **Accessibility by Design, Not Accommodation**. This means accessibility must be:

- Proactive, not reactive
- Built-in, not bolted on
- Enforced, not optional

"Accessibility by design" means DDBHH Canadians don't have to fight for equal access in internet services and that they get it from the start. That's equity. That's what this proceeding must deliver.

## 8. Closing Remarks

Commissioners, you should have a one-page handout that elaborates on what "Accessibility by Design, Not Accommodation means". It summarizes our overall points of our presentation today.

Thank you and the DWCC looks forward to working with the Commission on the next steps toward digital equity for DDBHH Canadians.

## Accessibility by Design, Not Accommodation means:

1) **Accessible Information from the Start**
    a) Broadband labels must be designed to be:
        i) Visual, icon-based (speed, weak/strong network indicators as visuals)
        ii) In ASL/LSQ via QR code or embedded video
        iii) In plain language with real-world usability
        iv) Screen-reader and tactile device compatible
    b) Accessible plan information must be available before and after purchase, across all platforms

2) **Inclusive Communication Systems**
    a) Complaint systems must allow:
        i) Direct ASL/LSQ video intake, not just written forms
        ii) Support for VRS, live chat, visual guides
        iii) A 10-day resolution window for accessibility-related complaints
    b) Promotions/outreach must:
        i) Be clearly labeled
        ii) Be delivered in ASL/LSQ
        iii) Be shared through DDBHH networks and organizations
        iv) Be available in-store with interpretation or video access

3) **Equitable Internet Services**
    a) No throttling or data caps for DDBHH consumers - these block access to video-based communication
    b) Unlimited, high-data plans must be labeled and promoted as accessibility options
    c) Labels must include:
        i) Actual, not advertised performance metrics
        ii) Regional data, not national averages
        iii) Technology type
        iv) Visual/signed explanations of usability impacts

4) **Built into Policy and Enforcement**
    a) All requirements must be formally embedded in the Internet Code
        i) No carve outs
        ii) No delays
        iii) No Voluntary options
    **b) ASL, LSQ, and ISLs formally recognized as the primary languages of Deaf, DeafBlind, and Hard of Hearing consumers**
    c) Accessibility delivery - (ASL/LSQ, plain language, icons, screen reader) must be mandatory
    d) CRTC must require:
        i) Regional public reporting of accessibility plan uptake
        ii) A CRTC-hosted dashboard to track and compare accessibility options
    e) All Rules must have clear enforcement mechanisms, not just “best practices”

# Exhibit 1
# Deaf Wireless Canada Consultative Committee Response

***Oversubscription Ratios***

The average Canadian household now operates over 10+ connected devices, including phones, tablets, laptops, smart TVs, and accessibility tools. For Deaf, DeafBlind, and Hard of Hearing (DDBHH) households, this figure carries even greater heavier weight. In these homes, **multiple devices are frequently used at the same time for essential, real-time video communications**, such Video Relay Services (VRS), remote interpreting, or direct video calls. This simultaneous usage places a significantly higher demand on bandwidth and device interoperability, making robust connectivity and reliable hardware not just a convenience, but a necessity for daily communication and independence.

Yet, oversubscription ratios and limited upload speeds fail to account for the evolving connectivity demands of modern households, particularly for DDBHH users. Legacy network planning models are still based on outdated assumptions of a single user engaging in passive internet use. These models no longer reflect the reality of modern households, where multiple high-bandwidth applications operate concurrently and real-time communication is central to daily functioning.

It is also essential to distinguish between passive streaming and two-way video communication. While streaming services primarily consume download bandwidth, two-way communication, especially as used in DDBHH communities, is interactive and bandwidth-intensive in both directions. For DDBHH individuals, real-time video communication is not entertainment; it is the primary, and often only, method for accessible, real-time conversation. As such, consistent high-quality upload speeds are just as critical as download speeds. Any network design or service quality standard that overlooks this distinction **risks leaving accessibility users behind and jeopardizing public safety**.

DWCC urges the Commission to require ISPs to transparently disclose the device-load assumptions that underpin their service offerings. Furthermore, DWCC calls for the adoption of an **Accessibility Lens**, a regulatory approach that recognizes the communication infrastructure needs of diverse households, including DDBHH communities, and ensures that service standards are inclusive, equitable, and future-ready.

In particular, this Accessibility Lens must treat video communication with the same regulatory priority as voice calls. For many DDBHH users, video is not a supplement. It is the primary means of real-time communication. Therefore, network standards must be designed to support multiple, simultaneous, high-quality video streams in both directions, just as they are currently expected to support reliable voice services.

## Response to the WSPs and ISPs companies:

For hearing users, **voice calls are never throttled, deprioritized, or capped** because voice communication is recognized as an essential service.

But for Deaf, DeafBlind, and Hard-of-Hearing (DDBHH) Canadians, video communication is our voice. We depend on real-time video communication for American Sign Language (ASL) or Langue des signes québécoise (LSQ) to communicate. This is not entertainment traffic - it is essential and must not be subject to throttling, data limits, or deprioritization.

If the voice isn't throttled, neither should the video. Equity, accessibility, and public safety demand consistent protection across all forms of essential communication. For DDDBH Canadians, real-time video is not optional or recreational. It is our primary, functional means of communication. Whether accessing emergency services, contacting health providers, participating in public life, or simply staying in touch with family or friends, we rely on high-quality uninterrupted video the same way hearing Canadians depend on voice calls.

The Commission has already affirmed in Telecom Regulatory Policy CRTC 2023-41, particularly in paragraphs 41 and 140, which state that accessibility must be proactively embedded into service design, network quality, and consultation processes.

Yet despite this, ISPs continue to treat accessibility-critical video traffic such as Video Relay Services (VRS), direct sign language video calls, and remote interpretation, as secondary or "entertainment-class traffic", subject to:

- Throttling
- Data limits
- Deprioritization

DWCC urges the Commission to require ISPs to publicly disclose:

- Whether and how real-time video communications used for accessibility purposes are being throttled, capped, or prioritized;
- How such video traffic is treated compared to voice calls;
- What safeguards are in place to ensure equitable, reliable access for DDBHH users.

If the Commission protects voice calls from throttling because they are essential, it must extend the same regulatory protections to real-time video communication used by DDBHH Canadians.

This is not a request for special treatment. It is a request for equal access to functionally equivalent communication, in accordance with the Accessible Canada Act and the Commission's own policy direction on equity and the removal of systemic barriers.

# Broadband Facts

**Provider Name**

**Service Plan Name and/or Speed Tier**

[Fixed or Mobile] Broadband Consumer Disclosure

| **Monthly Price** | **$00.00** |
|---|---|
| This monthly price is an introductory rate | Yes / No |
| Time the introductory rate applies | YY months |
| Monthly price after the introductory rate | $00.00 |
| Length of contract | YY months |

Link to Terms of Contract
https://www.example.com/terms-of-contract

**Additional Charges & Terms**

| | |
|---|---|
| Provider Monthly Fees | |
| Fee description | **$00.00** |
| Fee description | **$00.00** |
| Fee description | **$00.00** |
| Fee description | **$00.00** |
| One-Time Purchase Fees | |
| Fee description | **$00.00** |
| Fee description | **$00.00** |
| Early Termination Fee | **$00.00** |
| Government Taxes **Included/Varies by Location/** | **$00.00** |

**Discounts & Bundles**

Visit the link below for available billing discounts and pricing options for broadband service bundled with other services like video, phone, and wireless service, and use of your own equipment.

https://www.example.com/discounts

**Speeds Provided with Plan**

| | |
|---|---|
| Typical Download Speed | **000 Mbps** |
| Typical Upload Speed | **000 Mbps** |
| Typical Latency | **00 ms** |

| | |
|---|---|
| **Data Included with Monthly Price** | **000 GB** |
| Charges for Additional Data Usage | **$/GB** |

https://www.example.com/data-usage

**Network Management Policy**

https://www.example.com/network-management

**Privacy Policy**

https://www.example.com/privacy

**Customer Support**

Phone: (555) 555-5555
Website: https://www.example.com

Learn about the terms used on this label. Visit the Federal Communications Commission's Consumer Resource Center.

fcc.gov/consumer

Unique Plan Identifier: F0005937974123ABC456EMC789

# Accessibility Labels

**< This includes Accessibility Plans Y/N**

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