



Deaf Wireless Canada Consultative Committee

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April 23, 2025

Mr. Marc Morin
Secretary-General
Canadian Radio-Television and Telecommunications Commission
Ottawa, Ontario K1A 0N2

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

Re: Interim Cost Application - [Telecom Notice of Consultation CRTC 2024-318](#) Making it easier for consumers to shop for Internet services

Dear Mr. Marc Morin:

1. In accordance with the CRTC **Guidelines on the CRTC Rules of Practice and Procedure, Broadcasting and Telecom Information Bulletin CRTC 2010-959**, in **section XIV**, the Deaf Wireless Canada Consultative Committee (DWCC) respectfully submits its Interim cost recovery application for its participation in the Telecom Notice of Consultation [CRTC 2024-318](#) **Making it easier for consumers to shop for Internet services**.
2. According to **Telecom Regulatory Policy [CRTC 2010-963](#)**, *Guidelines for the Assessment of Costs* Part IV: Allocation of Costs, item 47, DWCC considers it appropriate that the payment for the costs for its participation originate from the **telecommunication service providers** based on their TORs (telecommunications operating revenues).
3. **DWCC** wishes to remind the telecommunication service providers about the *2023 Order Issuing a Direction to the CRTC on a Renewed Approach to Telecommunications Policy*¹, particularly items 2d. and 17c. whereas accessibility is mentioned. **DWCC** is aware that CRTC finds value by having accessibility groups involved where they provide valuable contributions to the proceeding.
4. In referencing this interim costs application package, **DWCC** encloses a description of its activity, its required expenses for the participation in the public hearing, and its eligibility for the cost recovery.

About DWCC

5. **DWCC** is an independent, not-for-profit organization that spearheads efforts to achieve communication equity with an interest and focus on telecommunications and wireless

¹ Reference link: [Order Issuing a Direction to the CRTC on a Renewed Approach to Telecommunications Policy \(SOR/2023-23\)](#)

issues. It represents a **particular, specific, and distinct subset/group of Deaf, Deafblind, and Hard of Hearing (DDBHH) Canadians.**

6. The mandate of **DWCC** is to advocate for accessible wireless communications equality for DDBHH Canadians. This includes:
 - a. Advocating for affordable accessible wireless data plans for American Sign Language (ASL) and Langue des signes québécoise (LSQ) users for two-way video calls.
 - b. Accessible industry-wide promotions of wireless services and products.
 - c. Provision of functional equivalent wireless products and services including wireless applications (apps).
 - d. Accessible wireless emergency services (including emergency alerts and direct text to 911).
 - e. Nationwide public awareness, education and outreach on current accessible wireless and mobile communication products and services.
 - f. Championing accessible broadcasting and online streaming services, including closed captioning, sign language content, and equitable funding models to support ASL/LSQ programming on all platforms.
7. **DWCC** is currently in the process of updating its name and mandate to better reflect its expanded advocacy role in broadcasting and streaming accessibility and to align with today's evolving social and regulatory landscape. A key focus of this revision is addressing the accessibility challenges faced by DDBHH Canadians, particularly in relation to broadcasting and telecommunications. In light of the *Accessible Canada Act* receiving royal assent on June 21, 2019, DWCC is placing greater emphasis on ensuring equitable access to information, communication, and services in broadcasting and telecom for the Canadian DDBHH community.
8. **DWCC** Steering Committee (equal to the board of directors with decision-making power) members are volunteers with administrative costs depending solely on cost recovery through the CRTC's cost application process. Members of DWCC come from cross-intersectional backgrounds and their primary languages are:
 - a. American Sign Language (ASL)
 - b. Langue des signes québécoise (LSQ)
9. **DWCC** has been established since July 2015, however has members with 16 and 39 years of direct experience with CRTC processes, participating in over 25 CRTC proceedings as a Committee. The DWCC Committee's description, purpose, and function are still accurate as analyzed and produced in the cost analysis decision outlined in [Telecom Order 2017-137](#).

DWCC Operations

10. **DWCC** would like to clarify that it has **no paid staff** and has **not received financial support from any other source** to enable its participation in regulatory proceedings.

- 11.** At present, **DWCC is still awaiting the outcome of its cost application for Telecom Notice of Consultation CRTC 2021-102**, and no payment has been received to date. Our **last substantive funding** came from the cost award granted for **CRTC 2020-178**, which sustained our advocacy work for a limited period. However, those funds have now been fully depleted.
- 12.** As a result, **DWCC is currently out of funds** and operating at a severe financial disadvantage, despite its consistent contributions to ensuring the DDBHH community's voice is represented in public proceedings. Notably, the delay in the processing of several cost applications has significantly contributed to this financial challenge. The Committee respectfully requests that this be taken into consideration regarding our ongoing participation and cost recovery applications.

Participation in the Public Hearing

- 13.** In order to participate in this proceeding, including compensation for flight, hotel and per diem costs, the **DWCC** needs to request interim costs so that these expenses can be covered while lacking existing funds to cover for these expenses.
- 14.** For this proceeding, **DWCC** members had three (3) members collaborating to collate responses and information in a detailed and comprehensive manner, submitted and contributed in an **organized** manner and **with a distinct point of view**.
- 15. Participant A** (Vancouver-based) will have costs associated with her participation including flight, accommodation, and essential costs are covered such as food, refreshments, travel to and from the airport. Additionally the **Participant B** (Chairperson) needs to travel by VIA Rail, accommodations, refreshments and travel to and from the train station. Costs are also calculated for the transport from the hotel to the public hearing. **Participant C** (Ottawa-based) is local in Ottawa so no costs are needed for their participation.
- 16.** Here is a breakdown of the travel costs, such as air and rail transportation:

a. YVR - YOW: Participant A	Air Canada: \$328.72 [estimate \$400.00] for lv. June 6 23:30, arr. 09:14am.
b. YOW - YVR: Participant A	Air Canada: \$355.34 [estimate \$400.00] for lv. June 10th 21:55 arr. 00:11 June 11
c. BLV to OTTW RT: Participant B	Via Rail: \$300.00 estimated for round trip
Total Travel/Transportation Cost:	\$1,100.00

17. Hotel accommodation:

Participant A (Vancouver-based) \$850.00 per person for 2 nights	Sunday - Tuesday	Courtyard	Marriott:
Participant B (Chairperson) \$850.00 per person for 2 nights	Monday - Wednesday	Courtyard	Marriott:
Total Hotel Accommodation:	\$1,700.00		

18. Per diem/meals: B = \$10.00, L = \$12.00, D = \$26.00

a. Person #1: \$48.00 for full day x 3 days = \$144.00

b. Person #2: \$48.00 for full day x 3 days = \$ 144.00

Total Per Diem (Meals): \$288.00

19. Taxi/Uber intercity costs based on previous trip in 2024:

a. Person #1: \$45.00 one way from airport to Courtyard by Marriott Ottawa
x 2 = \$90.00

b. Person #2: \$20.00 one way from VIA Rail station to Courtyard by Marriott
Ottawa x 2 = \$40.00

c. Both persons, courtyard by Marriott to public hearing location: \$22.00 x 2 =
\$44.00

Total intercity travel meals: \$174.00

20. Total requested for interim costs:

Transportation/travel: \$1,100.00

Accommodation/hotel: \$1,700.00

Per diem: \$ 288.00

Ground transportation: \$ 174.00

Total interim cost estimate: \$3,262.00

21. Receipts will be provided when we submit for final costs, with any differences added to the final total. The hours as consultants and analysts spent preparing and participating for the public hearing will be included in the final cost application including the final reply after the hearing.

DDBHH Canadians from an accessibility viewpoint

22. DWCC, dedicated to fostering collaboration and cooperative policymaking among consumer groups and organizations representing DDBHH Canadians, is **interested in the outcome of the proceeding (either an order or a policy decision), which would impact DDBHH Canadians.**

23. DWCC had a **strong interest in the development of a regulatory policy for making easier for consumers to shop for Internet services.** The primary goal was to ensure the **accessibility for DDBHH Canadians** when it comes to shopping for internet services.

Responsible Participation

24. DWCC actively engaged in this currently 5-month long proceeding, actively filing submissions and presenting documents that highlighted the lived experiences of DDBHH consumers for a barrier-free internet services shopping experience. By

appearing at the public hearing, Committee members are incorporating perspectives and experiences of DDBHH customers.

- 25. DWCC** is consistently committed to ensuring that the needs, perspectives and experiences of DDBHH Canadians are meaningfully represented in regulatory processes. By engaging with CRTC, **DWCC** strives for inclusive decisions that reflect the realities of the Canadian DDBHH community.
- 26.** The Committee believes that the filing and participation, including the direct involvement and participation of subject matter experts who are Deaf, Deaf-Blind and Hard of Hearing, **with the goal and intent to responsibly provide the CRTC and stakeholder participating organizations with a clearer understanding of DDBHH's experiences.** The Committee will complete the responsibility by appearing at the public hearing.

Closing Comments

- 27. DWCC** extends its gratitude to the CRTC and participants of the TNC 2024-318 proceeding for engaging with the DDBHH community. The Committee believes its contributions have been meaningful and looks forward to participating in the public hearing.
- 28. DWCC** also recognizes and values the diverse insights and interpretations provided by various groups, agencies, and individuals from the DDBHH community in these proceedings, appreciating the wide range of perspectives added to the record.
- 29.** Receipts and supporting documentation will be submitted with the final cost application, as per standard CRTC requirements. DWCC remains committed to transparent accounting and will ensure that all interim and final cost claims are submitted in accordance with CRTC requirements.
- 30.** As this is the first time the DWCC is filing for interim costs, please do not hesitate to contact DWCC at **regulatory@deafwireless.ca** should you have questions or require clarifications.

Sincerely,

Jeffrey Beatty, Chairperson
Deaf Wireless Canada Consultative Committee (DWCC)

CC: Nanao Kachi, CRTC
CC: Jade Roy, Public Hearings
CC: Telus Regulatory
CC: Rogers Regulatory
CC: Bell Regulatory

***** END DOCUMENT *****