



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 20, 2025

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

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

Subject: Final Reply of the DWCC to [Broadcasting Notice of Consultation CRTC 2025-2](#)

The Path Forward - Working Towards a sustainable Canadian broadcasting system

-
1. The **Deaf Wireless Canada Consultative Committee (DWCC)** submits this reply in response to Broadcasting Notice of Consultation CRTC 2025-2-4, *The Path Forward — Working Towards a Sustainable Canadian Broadcasting System*. DWCC represents the interests of Deaf, DeafBlind, and Hard of Hearing (DDBHH) Canadians and advances for the full recognition of American Sign Language (ASL) and Langue des signes québécoise (LSQ) as core components of Canada's broadcasting system. The *Accessible Canada Act*, the *Broadcasting Act*, and the *2023 Policy Direction* collectively mandate the removal of systemic barriers, the proactive inclusion of underrepresented communities, and the treatment of Canada's national sign languages.
 2. This submission addresses persistent gaps in accessibility, representation, and regulatory enforcement that prevent DDBHH Canadians from participating fully in Canada's cultural and civic life. **DWCC** urges the Commission to act decisively and without delay to ensure that ASL and LSQ content, Deaf-led media, and accessible platforms are embedded as non-negotiable pillars of Canada's broadcasting future.



Table of Contents

A. Accessibility and Sign Languages Inclusion	3
Regulatory and Legal Obligations for Accessibility	3
True Accessibility in Broadcasting	4
Inclusion in the Digital Era	5
Economic Inclusion, Cultural Development, and Public Service	5
B. ASL/LSQ and Deaf-Led Media	6
C. Funding and Investment Mechanisms	6
Systemic Funding Models and Policy Tools	6
Building Inclusion Through Dedicated Investment	7
Canadian Sign Languages Broadcasting Fund (CSLBF)	8
D. Discoverability and Platform Equity	8
Accessibility in Platform Design and Interface	8
Prioritizing Discoverability for Accessible Canadian Content	9
Preventing Cultural Erasure Through Policy	10
E. Children and Youth Programming	10
Equitable Access and Language Acquisition	10
Inclusive Representation and Accessible Discoverability for DDBHH Children	11
F. Community and Cultural Representation	13
Equity for Underrepresented and Intersectional Groups	13
Sign Language Inclusive Community Media	13
G. Structural Barriers and Market Power	15
Systemic Inequity	15
Regulatory Solutions for Equitable Access	16
H. Regulatory Modernization and Enforcement	17
Regulatory Inclusion and Obligations	17
Framework Design for Accessibility	18
I. Accessible News, Public Discourse, and Democratic Participation	20
Accessible News as a Democratic Right	20
Ensuring Visibility and Discoverability: Making Sign Language Media Unmissable	21
A Democratic Imperative	22
J. Strategic Recommendations and Policy Requests	22
K. Conclusion	23
L. Infographic of Four Recommendations	24



A. Accessibility and Sign Languages Inclusion

Regulatory and Legal Obligations for Accessibility

3. Ethnic Channels Group Limited states, “*We support a full, actionable policy review - and not in three to five years. We are on life support. It needs to happen now.*” **DWCC** echoes this urgency and emphasizes that timely action must also address the systemic exclusion of DDBHH communities. Immediate measures are required to close accessibility gaps — including robust support for ASL, LSQ, and Deaf-led media — as essential components of a truly inclusive Canadian broadcasting system. **This must happen in months, not years.**
4. BCE Inc.'s submission outlines a modernized vision for broadcasting, but fails to mention accessibility, ASL/LSQ, or obligations under the *Accessible Canada Act*. This omission is deeply concerning. A regulatory approach focused solely on market flexibility — without regard to human rights — risks further marginalizing DDBHH Canadians. **Accessibility is not a feature; it is a legislated right and must be central to any sustainable broadcasting future.** **DWCC** urges the Commission to reject models that sideline inclusion in favour of deregulation.
5. CDGM rightly asserts that true accessibility is key to inclusion for all Canadians. It must be integrated into all aspects of regulations, funding, and technology to ensure equitable access. **DWCC** strongly supports this approach and calls for a consistent accessibility lens across Canada’s broadcasting system.
6. Under *Section 5.1(2) of the Accessible Canada Act*¹, ASL and LSQ are recognized as the primary languages of Deaf persons in Canada. *CRTC Policy Direction 2023-2*, specifically *sections 2(d) and 17(c)*, mandates the proactive identification, removal, and prevention of barriers.
7. International obligations reinforce this. *Article 30(1)(b)*² of the *United Nations Convention on the Rights of Persons with Disabilities* affirms the right to participate in cultural life through accessible media. *Article 30(4)*³ recognizes the cultural and linguistic identity of persons with disabilities — including sign languages and Deaf culture — on an equal basis with others.
8. *Article 2 of the Convention on the Rights of Persons with Disabilities*⁴ recognizes and promotes the use of sign languages. It makes it clear that sign languages are equal in status to spoken languages.

¹ [Section 5.1\(2\), Accessible Canada Act](#)

² [Article 30\(1\)\(b\), United Nations Convention on the Rights of Persons with Disabilities](#)

³ [Article 30\(4\), United Nations Convention on the Rights of Persons with Disabilities](#)

⁴ [Article 2, United Nations Convention on the Rights of Persons with Disabilities](#)



9. The United Nation's *International Day of Sign Languages*⁵, celebrated on September 23rd, as an unique opportunity to support and protect the linguistic identity and cultural diversity of Deaf people and other sign language users. The Commission must follow this example by actively promoting Canada's sign languages, ASL and LSQ.
10. Yet, Canada lacks a national policy or regulatory mandating sign language programming. This critical gap highlights **the Commission's regulatory responsibility to ensure that these national sign languages are meaningfully embedded throughout the Canadian broadcasting system**—not treated as optional accommodations.

True Accessibility in Broadcasting

11. True accessibility requires more than captioning. It requires a clear, sustained commitment to sign language inclusion. This includes:
 - a. Creating ASL and LSQ content
 - b. Investing in Deaf-led media
 - c. Integrating of sign languages across platforms
 - d. Ensuring ease of discoverability of ASL and LSQ programming
 - e. Designing user-friendly platforms for sign language users
12. The City of Calgary illustrates accessibility with a powerful analogy: if your children want to play Frisbee and there's one on your counter, playing Frisbee is accessible. But if the Frisbee is on a neighbour's roof or buried in a cluttered storage unit, it's available — but not accessible without the right tools or help. **DWCC** echoes this message, emphasizing that Canadian broadcasting must go beyond mere availability of content to ensure true accessibility. This means removing barriers and providing programming in ASL and LSQ so DDBHH Canadians can fully participate in cultural and civic life.
13. **DWCC** strongly agrees with the City of Calgary's call for clear definitions of accessibility in broadcasting policy. Too often, availability is mistaken for accessibility. But from an equity standpoint, content that is merely available in English or French — even with captions — remains out of reach for many DDBHH Canadians.
14. Captions alone are insufficient. Equitable access requires content in ASL and LSQ, delivered through platforms that are intuitive and usable by sign language users. Like a Frisbee that's visible but unreachable, content without sign language access remains inaccessible — no matter how widely distributed.
15. Without these measures, DDBHH Canadians will continue to face systemic exclusion.

⁵ [International Day of Sign Languages on September 23rd](#)



Inclusion in the Digital Era

16. As Google notes, the digital era has transformed how content is created and accessed. **DWCC** agrees and adds that this shift has given sign languages unprecedented visibility. Intentional policy measures are necessary to ensure DDBHH Canadians are not left behind. ASL and LSQ content, Deaf-led media, and inclusive platforms must be central to Canada's digital broadcasting future.
17. Télé-Québec emphasizes that Canadian platforms must be as accessible as international ones. **DWCC** strongly supports this and stresses that true accessibility must include Canada's national sign languages — ASL and LSQ — across all services, digital and traditional.

Economic Inclusion, Cultural Development, and Public Service

18. Roberta Cordano, President of [Gallaudet University](#), notes in *How Sign Language is Driving a Multi-Billion Dollar inclusive Economy*⁶ that sign language drives employment for Deaf and hearing people across many sectors. **DWCC urges the Commission to support the development of a Canadian sign language economy within the broadcasting industry** — by investing in ASL and LSQ content, supporting Deaf-led media enterprises, and accessible infrastructure that benefits all Canadians.
19. The Canadian Association of Broadcasters highlights the economic contributions of broadcasters. **DWCC** adds that Deaf-led media can contribute equally — if given fair opportunity and regulatory support.
20. **DWCC** also supports the Documentary Organization of Canada's recognition that documentaries play a vital role in reflecting the Canadian and Indigenous diversity. Ensuring this content is accessible in ASL and LSQ is essential for inclusion of DDBHH audiences.
21. The City of Calgary notes the public service value of centralized broadcast channels for emergency communications, public alerts, and timing coordination. **DWCC** agrees and emphasizes that emergency communications must be accessible — including delivery in ASL and LSQ and other visual modes - to ensure safety for DDBHH Canadians.
22. **DWCC** commends Amazon Canada for its investment in French-language series, particularly in Quebec. **DWCC** now encourages it to extend its commitment to language diversity to accessibility — by expanding programming in ASL and LSQ and setting a new benchmark for inclusive digital programming.
23. **DWCC** strongly supports Timeless Inc./OneSoccer's advocacy for regulatory protections and equitable access for independent voices. The systemic exclusion they describe mirrors

⁶ [How Sign Language is Driving a Multi-Billion Dollar Inclusive Economy](#)



barriers faced by DDBHH Canadians. A sustainable system must guarantee inclusion, accessibility, and visibility — for all Canadians, not just those supported by major corporation entities.

B. ASL/LSQ and Deaf-Led Media

24. Ethnic Channels Group Limited rightly notes that audiences want choice, relevance, and 24/7 service in their own language. **DWCC** echoes this call and emphasizes that this must include sign languages — ASL and LSQ — to ensure DDBHH audiences are fully included in Canada’s diverse media landscape.
 25. Ethnic Channels Group Limited also warns that culturally specific broadcasters are being sidelined across platforms. **DWCC** draws a direct parallel: DDBHH communities face similar systemic exclusion due to the lack of ASL and LSQ content, and the absence of Deaf-led media. Like ethnic services, ASL and LSQ content must be recognized as essential to Canadian diversity — with structural protections, dedicated funding, and guaranteed visibility across platforms.
 26. **DWCC** recognizes AMI’s vital role as a 9.1(1)(h) service and its shared commitment to accessibility. While supporting services for persons with disabilities, **DWCC** emphasizes that true inclusion for DDBHH communities requires a dedicated platform for ASL and LSQ, alongside sustained investment in Deaf-led media that reflects DDBHH Canadians’ distinct cultural and linguistic identities.
 27. ASL and LSQ are not secondary formats or add-ons. They are primary languages, formally recognized under the *Accessible Canada Act*, and must be embedded at the core of an inclusive Canadian broadcasting system.
-

C. Funding and Investment Mechanisms

Systemic Funding Models and Policy Tools

28. Stingray notes that “*regulatory intervention will be essential in order for independent services to thrive. It will not happen on its own.*” This underscores the urgent need for intentional regulatory frameworks to ensure accessible and Deaf-led content not only survives but thrives alongside mainstream media.
29. **DWCC** aligns with Unifor’s call for strong regulations and sustainable supports to create equitable conditions. Without these, ASL and LSQ content, along with Deaf-led media, will remain marginalized and underresourced. **DWCC** also supports Unifor’s recommendation



that foreign broadcasters and BDUs contribute meaningfully to the Canadian broadcasting system, with dedicated support for ASL/LSQ content and Deaf-led programming—foundations of a truly inclusive media landscape.

- 30. Friends of Canadian Media stress the responsibility of online platforms to meaningfully support the Canadian system. **DWCC** proposes that 5% of suggested 30% contribution from online platforms be specifically allocated for ASL/LSQ content, Deaf-led programming, and accessibility technologies. This targeted investment is essential to ensure the equitable inclusion of DDBHH Canadians in the future of broadcasting.
- 31. **DWCC** strongly supports CDGM's call for an accessible-by-default Canadian broadcasting system, embedding accessibility not only in policy but also in funding models and implementation. For DDBHH Canadians, sign language content must be built into the system from the outset—not treated as optional.
- 32. Direct funding for DDBHH creators is essential. Without it, ASL, LSQ, and Deaf-led media will remain underdeveloped and underrepresented. Investment in DDBHH talent and stories is vital to equitable participation.
- 33. Access Communications Co-operative Limited has proposed a dedicated funding envelope to sustain community programming. **DWCC** echoes this call, proposing the creation of a \$10 million Canadian Sign Languages Broadcasting Fund (CSLBF). The Fund would provide sustained, targeted investment in accessible, culturally relevant ASL and LSQ content created by Deaf-led media, addressing a critical gap in equitable representation within Canada's broadcasting system.

Building Inclusion Through Dedicated Investment

- 34. Building on these systemic proposals, targeted investments in children's content are equally vital. **DWCC** supports the Youth Media Alliance's proposal that at least 15% of all funding contributions be mandated specifically for children's content, and further recommends that a minimum of 5% be allocated to accessible children's programming, including ASL and LSQ content. Without dedicated funding, DDBHH children will continue to face systemic exclusion from Canadian content ecosystems.
- 35. Similarly, **DWCC** endorses WildBrain's proposal for focused funding for Canadian children's programming on Canadian services, and emphasizes that a portion of this funding must be earmarked for ASL and LSQ content to effectively serve DDBHH children.
- 36. The Shaw Rocket Fund has noted that both BDUs and online undertakings benefit from Canadian audiences and therefore must contribute to Canadian programming. **DWCC** agrees, and underscores that these investments must explicitly support Deaf-led media and ASL/LSQ programming, and ensure equitable access for DDBHH communities.



Canadian Sign Languages Broadcasting Fund (CSLBF)

- 37.** CPAC supports the creation of a Strategic Economic Incentive Fund (SEIF) sourced from online platforms to sustain public interest media. **DWCC** reiterates its call for an annual \$10 million CSLBF to bolster ASL/LSQ content and Deaf-led media, which play key roles in civic engagement, linguistic rights, and equitable information access—yet remain vastly underfunded.
- 38.** To ensure effective oversight, **DWCC** recommends the Commission create a dedicated sign language-based commissioning body, modelled on the British Sign Language Broadcasting Trust (BSLBT), to administer the CSLBF. This body, led by DDBHH community members, would manage funding decisions, guarantee authentic representation, and uphold transparency and accountability through regular reporting on accessibility and community impact.
- 39.** Sustained investments and policy commitments are indispensable. Without decisive, sustained investment, Canada’s broadcasting future will fall short of its promise. Inclusion of DDBHH Canadians is not optional—it is a litmus test for whether our system truly reflects the diversity it claims to hold.
- 40.** **DWCC** urges the Commission to embed these recommendations in future funding policy decisions to ensure lasting equity and accessibility in Canada’s broadcasting future.
-

D. Discoverability and Platform Equity

- 41.** Over the past 14 years, audiences have rapidly shifted to global online platforms. As BCE Inc. notes, these foreign streaming services dominate viewership and revenue growth—often with minimal regulatory oversight. **DWCC** insists that any regulatory response must require these platforms to support not only the creation but also the discoverability of accessible content, particularly in ASL and LSQ.

Accessibility in Platform Design and Interface

- 42.** TFO articulates it well: “Access. Access. Access.” **DWCC** echoes this call and insists that platforms be intentionally designed with DDBHH users in mind, where ASL and LSQ content is core—not an afterthought or optional feature.
- 43.** Platforms such as Apple TV and YouTube are commended for their cross-device availability, but they fall short in linguistic accessibility. Truly accessible design must go further, including:
- Dedicated ASL/LSQ content sections,
 - Accessible search functions,
 - Comprehensive tagging of Deaf-led content.



44. Successful stories like [Deaf President Now!](#) (a landmark Deaf rights documentary) and [CODA](#) (an Oscar-winning film) exemplify the powerful and widely embraced impact of sign language content when properly featured. These examples prove that ASL content resonates widely—when platforms treat accessibility as a design principle, not a patch.
45. **DWCC** also recommends creating a centralized Canadian platform—a hub, similar to [LumoTV](#)—that aggregates sign language and Deaf-led programming. This would significantly simplify access for DDBHH audiences and promote cultural cohesion.
46. Additionally, platform interfaces must be equitable. As Télé-Québec noted, pre-installed platforms give platforms a significant competitive advantage. **DWCC** emphasizes that accessible platforms and content should be afforded the same treatment.
47. **DWCC** reinforces Toon-A-Vision’s concern over remote control bias, where branded buttons such as “YouTube,” “Netflix,” “Amazon,” and “Disney+” dominate while Canadian-regulated services are excluded. **DWCC** echoes this concern and urges that remote control interface designs be neutral and inclusive, ensuring visibility for ASL and LSQ programming.

Prioritizing Discoverability for Accessible Canadian Content

48. The Independent Broadcasting Group has called on all online distributors to make Canadian programming services prominent and easily discoverable. **DWCC** supports this and emphasizes that such discoverability must explicitly include ASL and LSQ programming. Without easy access, accessible media remains invisible, undermining Canada’s inclusion and accessibility goals.
49. The Canadian Association of Film Distributors & Exporters recommends that at least 30% of prime carousel slots on digital and streaming platforms be reserved for Canadian content—spanning both new releases and catalogue titles. **DWCC** supports this and further emphasizes that Deaf-led and ASL/LSQ programming must be explicitly included within that allocation to ensure cultural and linguistic equity.
50. **DWCC** also endorses CBC/Radio-Canada’s concern about the lack of regulatory requirements for connected TV platforms to feature or promote Canadian content. ASL/LSQ programming must be treated as core Canadian programming, with platforms required to:
- Promote accessible programming,
 - Publish annual discoverability plans,
 - Report visibility metrics for ASL/LSQ content.
51. Even distributors like Cogeco —though not content producers—shape visibility. Similarly, Amazon Canada’s curated carousels for Canadian content are promising, but must go further to feature Deaf-led media and ensure DDBHH audiences benefit fully from public and private investments.



Preventing Cultural Erasure Through Policy

- 52. Without targeted discoverability measures, ASL and LSQ content risks being erased from the Canadian media landscape.
- 53. TFO highlighted the urgency of improving discoverability and equitable access to French-language content, especially on connected devices and streaming platforms. **DWCC** fully supports this and insists that the same urgency apply to ASL and LSQ programming. Accessibility is not a luxury—it is a foundational principle of Canada's broadcasting system, as affirmed by the *Accessible Canada Act*.
- 54. **DWCC** echoes the Documentary Organization of Canada's call for diverse storytelling, asserting that DDBHH Canadians are integral to Canadian cultural diversity. ASL, LSQ, and Deaf-led stories must be positioned at the heart of Canadian media, not on its margins.
- 55. As AQPM warns, the immense volume of global audiovisual content threatens the visibility of Canadian programming. For ASL and LSQ content and Deaf-led media, the threat is even more severe. Without regulations that require promotion and visibility, Deaf-led media will continue to be sidelined.
- 56. **DWCC** strongly supports the Canadian Association of Broadcasters's recommendation that Canadian content be given pride of place on digital platforms. This must also apply to ASL and LSQ content, and Deaf-led programming. Platforms must publish annual, measurable plans with discoverability metrics for accessible content, ensuring DDBHH Canadians have equitable access to national stories, culture, and public discourse. Ensuring the visibility of ASL and LSQ programming isn't just a regulatory duty—it is a cultural imperative.

E. Children and Youth Programming

Equitable Access and Language Acquisition

- 57. Children and youth represent 18% of Canada's population. As the Youth Media Alliance notes, children's content is essential for the cultural and educational development of young Canadians. **DWCC** fully supports this view and emphasizes that such content must also be accessible in ASL and LSQ so that DDBHH children are not left behind. Early exposure to accessible media in sign language is critical for age-appropriate language acquisition and for preventing language deprivation⁷ in DDBHH children.
- 58. The Youth Media Alliance highlights that children aren't just another audience—they have unique developmental needs and limited purchasing power, a vulnerable group requiring

⁷ [Language Deprivation](#)



specific regulatory protections beyond general Canadian content measures. **DWCC** agrees and stresses that **DDBHH children are particularly vulnerable to language deprivation**. Accessible children's content in ASL and LSQ is essential to support early language acquisition and ensure equitable developmental opportunities.

59. Imagine a Deaf child sitting in the living room at home, watching an educational video that all their hearing counterparts understand—except them. With little to no ASL or LSQ programming available, and without the ability to read captions yet, the content remains inaccessible. This is not a rare occurrence—it's the everyday reality for many DDBHH children across Canada.
60. With intentional investment and accessible design, DDBHH children could grow up watching their favourite characters sign in their first languages—experiencing the same joy, learning, and belonging that hearing children take for granted. To address this gap, funding frameworks and licensing obligations must explicitly require the creation and distribution of children's programming in ASL and LSQ.
61. **DWCC** commends TVO for providing a safe and reliable Canadian-owned source of vetted educational programming, but is deeply concerned about the ongoing lack of accessible ASL and LSQ content for DDBHH youth. This exclusion is unacceptable. DDBHH children have a right to equitable, accessible educational programming that reflects and nurtures their cultural and linguistic identity. Immediate action is needed to close this persistent gap.

Inclusive Representation and Accessible Discoverability for DDBHH Children

62. Shaw Rocket Fund quoted CBC: *"We think it is important for diversity of voices that everyone participate."* **DWCC** wholeheartedly agrees and reiterates that DDBHH communities are an essential part of Canada's cultural diversity. Their voices, languages, and lived experiences must be represented equitably across Canada's broadcasting.
63. **DWCC** supports the Youth Media Alliance's call for quality, diverse content that reflects Indigenous Peoples, Official Language Minority Communities, and ethnocultural communities—recognizing children as a distinct population. **DWCC** supports this recommendation and adds that DDBHH children must be explicitly included in this vision. Programming in ASL and LSQ is vital to their linguistic, cognitive, social, and emotional development.
64. However, creation alone is not enough. For DDBHH children, meaningful inclusion requires that ASL and LSQ content also be easy to find and access. Without accessible discoverability, they are excluded from the very content intended to support their identity, education, and sense of belonging.



65. Shaw Rocket Fund states Canadian kids and youth content must be both made and found; **DWCC** echoes this, stressing that content in ASL and LSQ must be prioritized in platform searchability, user interfaces, and algorithmic promotion.
66. **DWCC** agrees with WildBrain's call to strengthen Canadian children's services that showcase programming primarily for Canadian audiences. However, inclusion from an early age means programming must be developed with and for DDBHH children, in their languages, ASL and LSQ.
67. Yet, as Big Bad Boo and Toon-A-Vision point out, dominant non-Canadian platforms like YouTube, TikTok, and Netflix increasingly shape young viewers' experiences. For DDBHH children, this growing reliance on global platforms compounds the problem: a severe lack of accessible, culturally relevant content.
68. Regulatory frameworks must therefore ensure that Canadian children's media includes ASL and LSQ programming—and that such content is visible, searchable, and easy to navigate across all major platforms and devices.
69. A child seeing characters signing in ASL can feel validated and inspired, fostering a deeper cultural connection and strong sense of identity. Representation in Canadian content—especially from an early age—not only nurtures belonging but also supports cultural continuity within DDBHH communities.
70. Shaw Rocket Fund warns, *"If we continue to allow BDUs to abandon Canadian kids and fail to require online platforms to serve this important audience, Canadian and Indigenous children and youth will lose access to their own voices, stories, languages, and culture."* **DWCC** concurs, emphasizing that DDBHH children also need guaranteed access to content in ASL and LSQ that reflects their unique languages, cultures, and experiences to foster identity, inclusion, and cultural continuity.
71. To ensure true equity and inclusion, Canadian media regulators, funders, and broadcasters must mandate the creation, funding, and accessible distribution of children's programming in ASL and LSQ. Immediate and sustained action is essential to close the accessibility gap and uphold the rights of DDBHH children. Such action nurtures their language development, identity, and sense of belonging within Canada's diverse media landscape, while preventing the harmful effects of language deprivation.
72. Multiple stakeholders, including the Youth Media Alliance, Shaw Rocket Fund, and Toon-A-Vision, emphasize that children's content must not only be created but also be easily discoverable across all platforms—from Smart TVs to app stores. **DWCC** strongly supports this and highlights the importance of ensuring accessible discoverability for ASL and LSQ content. Without accessible discoverability, DDBHH children are excluded from engaging with content made for them.



F. Community and Cultural Representation

Equity for Underrepresented and Intersectional Groups

- 73.** The Fédération des télévisions communautaires autonomes du Québec affirms the principle that equity must extend to historically underrepresented groups, including diverse cultural communities, who often face dual barriers: low visibility and limited resources. **DWCC** emphasizes that DDBHH communities face the same obstacles and that true equity requires accessible content in ASL and LSQ, alongside meaningful support for Deaf-led media initiatives.
- 74.** TLN Media Group Inc. calls for broadcasting to enable diverse ethnocultural communities to create their own content. Having championed this for decades, TLN calls for sustained support. **DWCC** stands firmly behind this vision and insists that meaningful inclusion must explicitly encompass DDBHH communities from these diverse backgrounds, with content available in ASL and LSQ.
- 75.** Ethnic Channels Group Limited noted that community media must reflect the culture, language, and lived experiences of the people it serves. **DWCC** agrees, adding that this inclusivity must also reach DDBHH individuals within these communities. By providing accessible programming in ASL and LSQ, all members, regardless of their hearing status, can fully engage with culturally relevant media that resonates deeply.
- 76.** The Forum for Research and Policy in Communications echoed the Chair's vision: *"Canadians have access to diverse programming that is both of the highest quality and representative of the Canadian population in all of its cultural and linguistic richness."* **DWCC** wholeheartedly supports this vision and stresses that true diversity must explicitly include sign languages—ASL and LSQ—and Deaf-led programming to guarantee equitable access and representation for DDBHH Canadians.
- 77.** The Canadian Association of Community Television Users and Stations expressed serious concern that community media's crucial role was overlooked in the consultation notice. They stated that community media is vital for serving equity-deserving groups, including DDBHH communities. **DWCC** concurs, noting that sidelining this element marginalizes DDBHH voices and limits opportunities for Deaf-led storytelling in ASL and LSQ. **DWCC** urges the Commission to explicitly recognize and support community broadcasting as a foundational pillar of an inclusive and sustainable Canadian broadcasting system.

Sign Language Inclusive Community Media

- 78.** TFO highlights that French is a minority language in Canada, a reality affirmed by the modernized 2023 Official Languages Act. Prioritizing French-language content—especially by and for Francophones in minority settings—is crucial. **DWCC** fully supports this priority and reminds the Commission that, under the *Accessible Canada Act*, accessibility must be



integrated into all aspects of content production and delivery, including ensuring content is accessible in ASL and LSQ for DDBHH audiences.

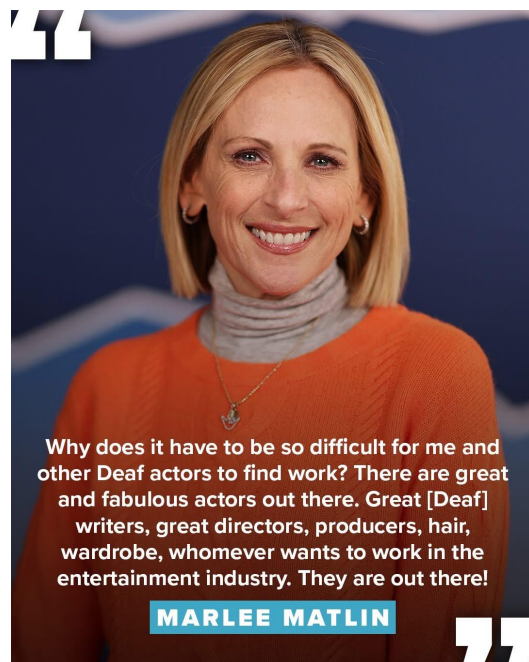
- 79.** Similarly, Aboriginal Peoples Television Network (APTN) stresses the importance of Indigenous Peoples hearing and using Indigenous languages in contemporary media. **DWCC** strongly agrees and insists that accessibility must also extend to DDBHH communities through the inclusion of ASL, LSQ, and Indigenous sign languages, enabling DDBHH individuals to **see and use sign languages**, just as spoken language users do.
- 80.** Documentaries play a crucial role in reflecting the diverse experiences of Canadians, often those overlooked in mainstream media. To ensure true inclusivity, the DDBHH community must be explicitly considered as an audience through the incorporation of sign language content in ASL and LSQ. Deaf filmmaker [Alvin Witcher's](#) work demonstrates the power of such accessible storytelling.
- 81.** **DWCC** acknowledges TVO's vital role in supporting Canadian content and championing independent producers, but urges this commitment to extend to linguistic diversity by including ASL and LSQ content. Priority carriage must also ensure DDBHH Canadians are represented through accessible, sign language programming.
- 82.** Emergency communication is another vital area where inclusivity matters. The Canadian Association of Community Television Users and Stations notes that a strong community media network supports Canada's Emergency Management Strategy by reaching local populations during crises. **DWCC** agrees and emphasizes that emergency alerts must be delivered in ASL and LSQ to ensure DDBHH communities are never left without critical information when it matters most.
- 83.** **DWCC** wholeheartedly supports Télé-Québec's position that public services with educational and cultural vocations should maintain privileged access to the broadcasting system to fulfill the Canadian Broadcasting Act's objectives. **DWCC** adds that this principle must also encompass DDBHH communities by ensuring content is available in ASL and LSQ. Providing such access is mandatory, as required by the *Accessible Canada Act*.
- 84.** Furthermore, **DWCC** aligns with the Canadian Communication Systems Alliance in recognizing that community programming offers Canadians valuable choices and local relevance. However, its sustainability depends on stable funding, which must include dedicated support for ASL and LSQ content to ensure that DDBHH communities are effectively represented and served by community media.
- 85.** As the Fédération des télévisions communautaires autonomes du Québec has affirmed, the future of the Canadian broadcasting system depends on our ability to preserve its core strengths: diversity, proximity, and authentic community voices. **DWCC** fully supports this vision and urges the Commission to enshrine ASL and LSQ content, along with DDBHH



communities' perspectives, as non-negotiable pillars of an inclusive, resilient Canadian community media landscape.

G. Structural Barriers and Market Power

86. Here is a [quote from Marlee Matlin](#) - *"Why does it have to be so difficult for me and other Deaf actors to find work? There are great and fabulous actors out there. Great [Deaf] writers, great directors, producers, hair, wardrobe, whomever wants to work in the entertainment industry. They are out there!"* - Parade Magazine, June 18, 2025



Systemic Inequity

87. Stingray states that *"rules designed to protect independent services and level the playing field in negotiations must be strengthened and vigorously enforced."* **DWCC** agrees and emphasizes that accessibility-focused and Deaf-led services must also benefit from these protections to ensure fair participation in the broadcasting system—this includes equitable access to distribution, funding, and visibility.
88. Corus Entertainment Inc. notes that independent programmers often lack access to owned distribution and face unfair treatment by both BDUs and foreign streamers. **DWCC** highlights that Deaf-led and accessible content providers face the same systemic exclusion. They are excluded from BDU systems, and digital platforms rarely support ASL/LSQ content or prioritize Deaf talent. Accessible, Deaf-led media are a vital form of independent Canadian content and must receive equal structural protections.



89. Cogeco argues that independent distributors face disadvantages compared to vertically integrated companies, which control both content and distribution. **DWCC** sees a parallel: ASL/LSQ content providers and accessibility-focused creators are similarly dependent on VI broadcasters and digital gatekeepers. Without regulatory safeguards, these voices remain shut out from mainstream platforms and denied the opportunity to reach broad audiences.
90. **DWCC** shares Anthem’s concern that VI entities limit room for diverse, independent voices—even in dominant spoken languages. This imbalance is even more acute for DDBHH communities. The current framework privileges VI-controlled English and French content while sign language programming remains sidelined. Without strong, enforceable policies, DDBHH and signing Canadians will continue to be excluded from equitable representation and full participation in Canadian broadcasting.
91. **DWCC** also echoes the Canadian Media Producers Association’s concern about the concentrated market power of a few buyers. For Deaf-led media and ASL/LSQ content producers, these barriers are even higher. They face limited access to buyers, little visibility on mainstream platforms, and few opportunities for funding. A more inclusive broadcasting system requires regulatory interventions that guarantee shelf space, discoverability, and funding for underrepresented creators.
92. Without immediate policy reform—such as mandatory carriage requirements, dedicated ASL/LSQ content funding, and accessibility standards—Deaf-led and accessible media will remain marginalized and systemic inequity will persist.

Regulatory Solutions for Equitable Access

93. *“We’re not asking for accommodation. We’re asking for recognition.”*
— **DWCC** CRTC Hearing, May 15, 2025
94. This principle must guide regulatory reform. Accessibility is not a courtesy—it is a right. And inclusion cannot depend on market goodwill. **DWCC** urges the Commission to adopt enforceable policies that guarantee access, visibility, and funding for ASL/LSQ content and Deaf-led media. Structural inequity will persist unless accessibility is mandated, resourced, and protected under the law.
95. **DWCC** supports Timeless Inc./OneSoccer’s call for enforceable carriage obligations and equitable treatment of independent services. DDBHH media faces similar systemic exclusion—despite its national and cultural significance. For instance, the Deaflympics⁸—an IOC-sanctioned event—receives little to no Canadian coverage, unlike the Paralympics. This absence reflects a broader failure to treat accessibility as an essential pillar of public broadcasting.

⁸ [Deaflympics](#)



96. Corus notes that dominant players like Rogers use their market power to de-prioritize or exclude content. **DWCC** draws a direct parallel: without regulation, Deaf media is at constant risk of being entirely excluded by major BDUs and digital platforms. These gatekeepers control not only what gets seen, but who gets to be seen.
97. Cogeco adds that VI companies lack incentive to work with independent distributors. The same applies to accessibility. When market forces alone dictate content priorities, accessibility features—like ASL/LSQ—are often labelled as “unprofitable” and cut. This reveals a critical truth: **accessibility will not happen unless it is mandated**.
98. Both the *Broadcasting Act* and the *Accessible Canada Act* affirm that accessibility and inclusion are legal obligations—not optional enhancements. These principles must be fully implemented across Canada’s broadcasting system. **DWCC** urges the Commission to ensure that accessibility is not left to chance or market forces—it must be regulated, funded, and enforced.
99. The Commission must act now—not only to advance equity, but to uphold its legal obligations under the *Broadcasting Act* and the *Accessible Canada Act*, which the current system is already failing to meet.
-

H. Regulatory Modernization and Enforcement

Regulatory Inclusion and Obligations

100. **DWCC** emphasizes the urgent need for stronger regulatory inclusion of DDBHH Canadians in broadcasting. Accessibility is not a market-driven luxury—it is a right enshrined in the *Accessible Canada Act* and the *Broadcasting Act*. When accessibility obligations are not embedded into regulatory frameworks, structural inequities persist. The next-generation broadcasting framework must explicitly prioritize equity, accessibility, and linguistic inclusion for ASL and LSQ users.
101. Quebecor Media Inc. argues against additional codes and calls for regulatory relief. **DWCC** respectfully disagrees. The *Accessible Canada Act* requires enforceable standards. A new CRTC TV and Digital Access Code is essential to ensuring an equitable and inclusive broadcasting system for DDBHH audiences.
102. TLN Media Group stresses the importance of regulatory intervention to secure the future of Canadian ethnic programming. **DWCC** agrees and adds that this future must also prioritize accessibility. Fully integrating ASL and LSQ will reflect Canada’s cultural and linguistic diversity while upholding the principles of equity and inclusion.



- 103. DWCC** rejects Rogers’ argument that market forces should dictate content distribution. Commercial priorities routinely exclude DDBHH communities. ASL and LSQ are protected language rights—not optional features or market-driven content.
- 104.** The Commission must maintain strong regulatory oversight and mandate the inclusion of ASL and LSQ as equity obligations. As the Forum for Research and Policy in Communications emphasized, access to Canadian programming cannot be left to market forces, which consistently label accessible content “unprofitable.” The *Broadcasting Act* prioritizes inclusion and diversity — not commercial metrics. ASL/LSQ must be treated as rights, not optional features.
- 105.** The Commission not only has the authority—but the responsibility—to act. As Friends of Canadian Media stated, “*Pay no mind to the cries of the streamers that you don’t have the jurisdiction or policy to proceed—you do.*” Accessibility — including ASL/LSQ content and Deaf-led media — must be meaningfully integrated into the regulatory framework. As the Canadian Communication Systems Alliance noted, the system doesn’t need fewer regulations — it needs the right regulation applied equitably. Enforceable accessibility standards must be central to that framework to ensure the full participation by DDBHH Canadians.
- 106.** Telus has emphasized that the Commission must act now to update the regulatory framework, noting key pillars of the existing framework were established over a decade ago. **DWCC** agrees, emphasizing that modernization must include clear, enforceable accessibility standards embedding ASL, LSQ, and Deaf-led content — all of which are essential to fulfilling the *Accessible Canada Act’s* mandate for a barrier-free Canada.
- 107.** ACCORD stated, “*Regulation is necessary to ensure that those benefit from access to Canadian audiences are contributing to the system.*” **DWCC** strongly agrees. That contribution must extend to ASL and LSQ content and Deaf-led media. The Commission must seize this opportunity to embed accessibility and equity as non-negotiable pillars in Canada’s broadcasting future — ensuring a truly inclusive media landscape for all Canadians.

Framework Design for Accessibility

- 108.** A broadcasting system that truly serves all Canadians requires more than regulation alone—it requires a framework built from the ground up for inclusion. **DWCC** urges the Commission to adopt a future-facing approach where ASL and LSQ content are seamlessly integrated into platform standards, measurement systems, funding models, and digital interfaces. A meaningful presence of Deaf-led media and ASL/LSQ content must be prioritized as a forethought, not treated as an afterthought. As technology evolves toward digital platforms, **accessibility must be embedded from the start.**



- 109.** Google LLC highlights the need for a regulatory approach that recognizes the distinct nature and significant contributions of online platforms like YouTube, rather than imposing outdated frameworks on a dynamic and evolving ecosystem. **DWCC** concurs, emphasizing that modern regulation must ensure accessibility, including explicit requirements for ASL and LSQ content to ensure DDBHH Canadians are fully included in this evolving media landscape.
- 110.** The call for must-carry status under section 9.1(1)(h) by Toon-A-Vision is vital. Guaranteeing carriage and visibility of essential Canadian services—especially those representing diverse communities such as DDBHH broadcasters—on all platforms is crucial to preserving Canadian culture and promoting inclusion. This commitment aligns with paragraph 3(1)(p) of the *Broadcasting Act*, which mandates programming accessible without barriers and opportunities for all Canadians to contribute their voices.
- 111.** AQPM has recommended implementing Codes of Practice to establish clear guidelines for rights and access to Canadian and foreign broadcasting services by independent producers, and further urged the Commission to ensure Canadian content is present on foreign platforms. **DWCC** supports these recommendations and adds that a new CRTC TV and Digital Access Code is essential to guarantee equitable inclusion of ASL/LSQ content, Deaf-led media, and accessible platforms—both domestically and on foreign platforms—to secure fair representation and access for DDBHH audiences.
- 112.** **DWCC** supports Magnify Digital’s call and emphasizes the importance of including accessibility data within modern engagement metrics. Without these metrics, understanding audience engagement remains incomplete. It is imperative that the Commission treats accessibility metrics as core metrics in both funding criteria and national media strategies.
- 113.** Blue Ant stated — “We support many of the proposals you’ve heard from independent broadcasters to extend the regulatory framework to include online platforms that function like virtual BDUs, particularly around access and discoverability.” **DWCC** agrees and emphasizes that this framework must treat sign languages equitably with spoken languages. ASL and LSQ content, Deaf-led media, and DDBHH audiences must have equal access and discoverability across all platforms. Sign languages are not optional—they are foundational to any inclusive broadcasting system.
- 114.** To build a truly accessible and equitable media landscape, the Commission must embed these principles into the design of a future-facing regulatory framework that guarantees the full participation of DDBHH Canadians, now and in the years ahead.
-



I. Accessible News, Public Discourse, and Democratic Participation

Accessible News as a Democratic Right

- 115.** **DWCC** agrees with News Forum Inc. that Canada's broadcasting system must reflect not only our diversity, creativity, but the very heart of our democracy. Now more than ever, the need for Canadian perspectives and diverse news are essential. **DWCC** emphasizes that these values must include accessible news in ASL and LSQ to ensure DDBHH communities are fully included in democratic dialogue.
- 116.** The News Forum Inc. notes that national news services, as recognized by the Commission, play a vital role in exposing Canadians to diverse viewpoints and informing them on matters of public concern. This diversity must include ASL and LSQ news, ensuring DDBHH Canadians can equally access critical public information. Beyond access, such services educate the broader public about sign languages and the lived experience of DDBHH people—fostering greater understanding and inclusion.
- 117.** CPAC argued that parliamentary coverage is essential to a healthy democracy and must be sustained by all players in the system. **DWCC** stresses that sign languages—through ASL and LSQ—enable civic engagement and linguistic rights, providing vital democratic content for DDBHH communities.
- 118.** CHEK Media Group emphasized that Canadians need access to reliable news, especially during times of crisis. **DWCC** strongly agrees and underscores that this access must include DDBHH individuals through news broadcasting in ASL and LSQ. Without ASL and LSQ news, emergency broadcasts can leave DDBHH individuals without life-saving information—undermining public safety, inclusion, and equality.
- 119.** On August 13, 2025, during a wildfire update in Newfoundland, CTV's on-screen banner blocked the ASL interpreter, leaving DDBHH Canadians without critical emergency information. This avoidable failure underscores a grave policy gap — and the urgent need for enforceable accessibility standards in broadcast and digital media that save lives.
- 120.** CHCO-TV recommended the Commission require platforms to prioritize content visibility based on civic impact rather than commercial scale. **DWCC** supports this approach to ensure that DDBHH communities are visible and valued—not sidelined by commercial algorithms. Prioritizing civic impact would improve discoverability of ASL and LSQ content and promote true equity in Canada's broadcasting system.
- 121.** The News Forum emphasizes the importance of protecting the public square to support democratic dialogue, diversity of thought, and participation by independent voices, stating: *"We try to cultivate a healthy public square - a safe space to have difficult conversations, and we are not here to win."* **DWCC** agrees and insists that this public square must be accessible to DDBHH Canadians. True public discourse requires equitable access through



ASL, LSQ, and Deaf-led media, ensuring all Canadians can meaningfully participate in shaping the national conversation.

- 122.** To uphold a truly democratic public square, the Commission must mandate accessible news services that centre ASL, LSQ, and Deaf-led journalism as core components of Canada’s media landscape.

Ensuring Visibility and Discoverability: Making Sign Language Media Unmissable

- 123.** In a digital era dominated by endless streaming options and foreign content, Canada’s 357,000 Culturally Deaf Canadians and 3.21 million⁹ hard of hearing Canadians risk being left behind—hidden in plain sight without meaningful access to news in their own languages. Without intentional policies to ensure visibility and funding for ASL and LSQ media, these essential voices face permanent exclusion from the national conversation.
- 124.** CHEK Media Group warned that without regulatory actions to ensure prominence on digital platforms, Canadian content and journalism risk being overshadowed by foreign programming. **DWCC** echoes this concern and emphasizes that ASL and LSQ content—already marginalized—faces an even greater risk of being excluded from digital discovery. Regulatory measures must explicitly include sign language programming to ensure ASL and LSQ content is visible, discoverable, and equitably represented.
- 125.** CHCO-TV stresses the importance of having local journalism discoverable by design, not by default. **DWCC** concurs and adds that this must apply to ASL and LSQ news content and Deaf-led media. Accessibility must be intentional, not incidental. DDBHH communities face ongoing barriers to timely, relevant information in their languages.
- 126.** Building on the need for discoverability, CHCO-TV recommended that the Commission mandate a “Canadian Basics” section on all major streaming platforms and smart TVs. **DWCC** supports this proposal and urges that this section must include ASL and LSQ content, alongside Deaf-led programming, to ensure DDBHH communities are equitably represented and can easily access content in sign languages.
- 127.** Local Independent Television Stations emphasized the importance of requiring foreign platforms—which now capture a significant share of Canadian revenues—to contribute meaningfully to local news. **DWCC** concurs and adds that these contributions must extend to ASL and LSQ news programming, helping to build a fully inclusive and accessible Canadian news ecosystem.
- 128.** Stable and predictable funding is the lifeline for independent media. RNC Media Inc. and Télé Inter-Rives Itée highlighted this need, emphasizing that local television stations require long-term financial support. **DWCC** demands that the Commission establish an annual \$10

⁹ [Statistics on Deaf Canadians - Canadian Association of the Deaf](#)



million Canadian Sign Languages Broadcasting Fund to guarantee the sustainable creation and nationwide distribution of ASL and LSQ content and Deaf-led media from coast to coast.

- 129.** The News Forum outlined the challenges faced by new independent services, including the disproportionate bargaining power held by legacy broadcasters, limited distribution, and the significant financial burden of producing national news. **DWCC** notes that Deaf-led media face similar structural challenges, with chronic underfunding and exclusion from mainstream systems. Dedicated financial support and regulatory protections are essential to ensure their sustainability and growth.

A Democratic Imperative

- 130.** Canada cannot afford to leave its DDBHH communities behind in the digital era.
- Without visibility, there is no access.
 - Without funding, there is no future.
 - Without inclusion, there is no democracy.
- 131.** This is not just a policy matter—it is a democratic imperative. Canada’s media must reflect the full diversity of its people—including those who sign. Anything less isn’t just exclusion—it’s a broken promise.
-

J. Strategic Recommendations and Policy Requests

- 132.** **DWCC calls on the Commission to embed a comprehensive Accessibility Lens at every level of Canada’s broadcasting regulatory framework.** By applying this lens systematically, the Commission will ensure that content created in ASL and LSQ is recognized as Canadian programming, that DDBHH creators receive equitable support, and that accessibility a core pillar of cultural policy—not an afterthought.
- 133.** **DWCC urges the Commission to lead with bold vision by placing sign language and Deaf-led media at the very heart of Canada’s broadcasting system.** As a foundational commitment within BNC CRTC 2025-2, this visionary strategy is crucial for shaping a truly inclusive, innovative, and sustainable future for Canadian media that reflects the full diversity and strength of our nation.
- 134.** **Key recommended actions include:**
- 1) Set and regulate a TV & Digital Access Code for Broadcasting**
 - Mandate a minimum of **5% quota** of Canadian content in ASL and LSQ
 - Set robust discovery, indexing, & accessibility standards for sign language
 - Clear visibility of ASL/LSQ interpreters during emergency broadcasts



2) Create a Sign Languages Commissioning Body (modelled after LumoTV)

- Empower DDBHH professionals in decision-making roles
- Commission DDBHH-led projects across platforms
- Develop and enforce ASL and LSQ content standards

3) Establish a Canadian Sign Languages Broadcasting Fund (CSLBF)

- Ensure DDBHH-led governance and administration of annual \$10 million
- Sustain and scale original ASL and LSQ programming
- Correct systemic underfunding of signing communities in Canadian media

4) Launch a CRTC Feasibility Study on Sign Language Broadcasting

- Model study on Telecom Decision 2009-430
- Map out sustainable funding models and content pathways
- Conduct meaningful consultation with DDBHH-led organizations

135. DWCC's recommendations are designed to guarantee that sign language users are equitably included and empowered in Canada's evolving broadcasting framework—ensuring no one is left behind as our media system grows and innovates. The time for incremental change has passed. Canada's media future must be inclusive by design-starting now.

K. Conclusion

136. Canada stands at a pivotal moment in shaping its broadcasting system for the next generation. The choices made now will determine whether DDBHH Canadians are equitably represented in our national landscape—or left once again on the margins. The *Accessible Canada Act* and the *Broadcasting Act* make clear that accessibility is a legal obligation, not an optional feature, and the *2023 Policy Direction* underscores the urgency of removing barriers across all sectors of the broadcasting system.

137. DWCC calls on the Commission to adopt our key recommendations: establish a regulated TV & Digital Access code, create a Sign Language Commissioning body, establish a Canadian Sign Languages Broadcasting Fund, and launch a feasibility study on sign language broadcasting. These measures will correct decades of systemic exclusion, safeguard Canada's cultural and linguistic diversity, and ensure that DDBHH Canadians can participate fully in civic, cultural, and democratic life.

138. A sustainable broadcasting system is one that is inclusive by design. The time for incremental change has passed—now is the moment for bold, enforceable action to ensure ASL, LSQ, and Deaf-led media are permanent pillars of Canada's broadcasting future.



L. Infographic of Four Recommendations

4 Recommendations for a sustainable Canadian Broadcasting system

1

Set and regulate a new CRTC TV & Digital Access Code

Mandate a minimum of 5% quota of Canadian content in:

- American Sign Language (ASL)
- Langue des signes québécoise (LSQ)



2

Create a Sign Language Commissioning Body

Empower Deaf, DeafBlind, and Hard of Hearing individuals to:

- Commission DDBHH-led projects across platforms
- Develop and enforce ASL and LSQ content standards



3

Establish a Canadian Sign Languages Broadcasting Fund (CSLBF)

A dedicated fund of \$10 million annually to:

- Support ASL and LSQ content and Deaf-led media
- Correct systemic funding of ASL and LSQ in Canadian media



4

Launch a feasibility study on a Sign Language-based broadcasting system in Canada

Model study on Telecom 2009-430 to:

- Have meaningful consultations with DDBHH-led organizations
- Map out sustainable funding and content pathways



*** END OF DOCUMENT ***

