DEAF WIRELESS CANADA COMMITTEE
COMITÉ POUR LES SERVICES SANS FIL DES SOURDS DU CANADA

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VIA EMAIL DISTRIBUTION and GC KEY

November 21, 2025

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

Public record: 1011-NOC2025-0180

Dear Secretary General,

Re: TBNC CRTC 2025-180 Call for comments – Improving the public alerting system - Intervention

About DWCC

1. The Deaf Wireless Canada Consultative Committee (DWCC) advocates for the full inclusion of diverse members within the Canadian Deaf, DeafBlind, and Hard of Hearing (DDBHH) community in Canadian society. The spectrum of DDBHH life experiences, including those that are Indigenous and 2SLGBTQIA+, ranges 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 the notion that Indigenous users have the right to request support, including the use of Indigenous Sign Language interpreters. When DWCC writes DDBHH, it encompasses all individuals with intersectional identities.

2. **DWCC**'s mandate is to advocate for accessible wireless communications equity for DDBHH Canadians, including but not limited to:

    a. Cost-effective, 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 the 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.

3. DWCC is currently undergoing a strategic update of its name and mandate to reflect today's evolving social and regulatory priorities, with greater emphasis on addressing accessibility challenges across broadcasting and telecommunications.

4. This change aligns with the *Accessible Canada Act*[1] (royal assent: June 21, 2019), which affirms a national commitment to building a barrier-free Canada by 2040. The proposed mandate is as follows:

    a. Increasing the quality and accessibility of closed captioning via traditional broadcasting and online streaming services
    b. Increasing accessible sign languages in telecommunications, streaming platforms, and broadcasting services
    c. Educate the Commission, telecom services providers, wireless service providers, internet providers, broadcasting service providers, streaming service providers, and innovative service providers about the employability of DDBHH and recruiting, training, hiring and retention of skilled and qualified DDBHH trainees and individuals in the Commission, telecommunications, broadcasting, and streaming industries.

5. As a national Deaf-led organization with more than ten years of experience in telecommunications accessibility, DWCC draws on national survey data, direct interviews, and community consultations to inform our submission. As a consumer group representing DDBHH communities, we remain committed to ensuring that the equity-seeking groups' voices are directly reflected in the public record.

6. Across these proceedings, DWCC's interventions have consistently provided unique community insights that industry actors alone could not supply, making accessibility and equity central to regulatory decision-making.

7. DWCC has also partnered with the Canadian National Society of the Deaf-Blind (CNSDB) and the Deaf-Blind Planning Committee (DBPC) to integrate Deaf-Blind perspectives and experiences, while working with an Indigenous Deaf consultant to ensure Indigenous perspectives are included.

[1] *Accessible Canada Act* (S.C. 2019, c. 10).

Inclusive Terminologies

8. DWCC urges the Commission and all participating groups to use terminology that is respectful and inclusive, reflecting the lived experiences and self-identification of the communities involved.

DDBHH Ordering

9. DDBHH is intentionally written in this order, based on guidance from the Canadian National Society of the Deaf-Blind (CNSDB) since its collaboration with DWCC during the TNC 2016-116 proceeding. The term *Deaf-Blind* is a deliberate choice, as individuals who self-identify as Deaf-Blind generally align culturally with the Deaf community rather than the Hard of Hearing community. Therefore, and as directed by the appropriate Canadian Deaf-Blind authority (CNSDB), the order must remain as *DDBHH*.

Deaf-Blind or DeafBlind (DB)

10. Across Canada, spelling and terminology vary. In British Columbia, for example, organizations such as the Deaf-Blind Planning Committee (DBPC) and the Deaf, Deaf-Blind and Hard of Hearing Well-Being Program use the hyphenated form “Deaf-Blind,” as does the Canadian National Society of the Deaf-Blind (CNSDB). Elsewhere in Canada, including parts of Alberta, Ontario, and other provinces, organizations and individuals prefer the single-word form “DeafBlind.” Both forms describe the same lived experience and reflect the evolution of language, regional identity, and organizational history.

Indigenous

11. DWCC uses the term DDBHH (Deaf, DeafBlind, and Hard of Hearing) with an intersectional approach, recognizing that Indigenous individuals are included within this umbrella. At the same time, we fully respect the self-determination and cultural autonomy of Indigenous peoples. Our Indigenous Deaf consultant has clearly stated that “Deaf Indigenous” is not appropriate, explaining that “Indigenous people are always Indigenous first before they are Deaf.” Accordingly, we recommend using “Indigenous Deaf” as the preferred terminology going forward.

Submission Context

12. DWCC’s objective is to help ensure the Commission’s review of the National Public Alerting System (NPAS) fully considers the barriers, safety concerns, and communication challenges that DDBHH Canadians face during emergencies, and that any new measures

support the goals of the Telecommunications Act[2], the Broadcasting Act[3], the Accessible Canada Act[4], and the Charter's equality rights.[5]

13. DWCC is pleased to submit this intervention for CRTC Proceeding 2025-180, which examines, among other key issues, the Commission wishes to address, how accessible the NPAS is for DDBHH individuals.

14. DWCC files this intervention alongside three supplemental documents:
    a. No One Left Behind: *Deaf community Interview Insights & Recommendations for accessibility in Canada's emergency public alerting system*
    b. Deaf and Hard of Hearing Survey Analysis Report
    c. DeafBlind Survey Analysis Report

15. DWCC now begins its responses to the Commission's questions for CRTC Proceeding 2025-180, entitled "Review of the accessibility of Canada's National Public Alerting System." In the following sections, we address each issue raised by the Commission, drawing on national survey data, community interviews, and lived experiences to inform our recommendations.

16. Different teams were responsible for the interview report and the survey reports, so responses to Commission questions and findings may be drawn from two separate sources, each prepared by distinct team members. Please note that answers may be inserted from either report based on the unique methodology and results of each. This ensures that both qualitative insights from interviews and quantitative data from surveys are appropriately represented.

[2] *Telecommunications Act* (S.C. 1993, c. 38), ss. 24, 24.1.
[3] *Broadcasting Act* (S.C. 1991, c. 11).
[4] *Accessible Canada Act* (S.C. 2019, c. 10).
[5] *Canadian Charter of Rights and Freedoms*, Part I of the Constitution Act, 1982, being Schedule B to the Canada Act 1982 (UK), 1982, c. 11.

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DWCC Responses to Commission Proceeding Questions

QUESTION 1

Q1. In light of the revised CLF guidelines on the dissemination of emergency alerts in both official languages, is it reasonable and appropriate for the Commission to take additional measures, within its regulatory authority in the Telecommunications Act and the Broadcasting Act, to require LMDs to relay alerts in both English and French when they are issued as such?

(a) If so, what regulatory measures should the Commission consider under the Telecommunications Act and the Broadcasting Act? For instance, should the Commission consider imposing new conditions of service under the Telecommunications Act and imposing new conditions of service and amended conditions of exemption orders under the Broadcasting Act?

17. **DWCC Response:** Interview evidence from Deaf, DeafBlind, and Hard of Hearing community members across Canada reveals significant and persistent gaps in accessible emergency alerts, particularly for French and sign language users. Alerts are often delivered only in English, even in bilingual regions, and access to sign language (ASL/LSQ) is absent. Francophone and LSQ participants described receiving delayed, text-only, or inconsistent alerts, and expressed universal frustration with the unreliable delivery of French and LSQ services.[6]
    a. Quebec (LSQ accessibility gap): Emergency alerts "rarely feature LSQ in real-time," despite the province's bilingual obligations[1]
    b. New Brunswick: Alerts are issued "only in written French or English," with no LSQ and inconsistent language coverage across borders [1]
    c. Ottawa: Even in the nation's capital, alerts are often "late or text-only," dominated by English, and lacking bilingual and sign-language equivalents [1]
    d. General findings: Francophone and LSQ users expressed "frustration that most messages appeared only in English, with minimal or no translation into LSQ or French"[1]

18. These findings show **clear systemic failures** in the delivery of alerts in both official languages across Canada.

19. Therefore, it is reasonable and appropriate, given the Commission's obligations under the:
    a. Telecommunications Act[7] (s. 24, 24.1 conditions of service)

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[6] Deaf Wireless Canada Committee (DWCC). (2025). *No One Left Behind: Deaf community interview insights & recommendations for accessibility in Canada's emergency public alerting system* (Prepared for TBNC, CRTC Proceeding 2025-180)
[7] *Telecommunications Act* (S.C. 1993, c. 38), ss. 24, 24.1.

b. Broadcasting Act[8] (conditions of licence and exemption orders)
c. Official Languages Act[9] policy alignment
d. updated CLF Guidelines

20. Require that LMDs relay alerts in both English and French when authorities issue them in both languages.

What Needs to Change: Telecommunications Act [7] (Sections 24 and 24.1)

21. **DWCC Response:** The Commission should require all wireless providers to relay bilingual alerts in both English and French, exactly as written by alerting authorities in the original Common Alerting Protocol (CAP) message. This addresses the issue of inconsistencies and English-only delivery shown in Quebec, New Brunswick, Ontario, and elsewhere.[10]

22. The mandate must go beyond introductory text by requiring the simultaneous delivery of plain-language content and multiple accessible formats, including ASL and LSQ videos, high-contrast text, and device vibrations for DeafBlind users, so that no one is excluded. To further support quick understanding, all alerts should include relevant emergency symbols or emojis (such as 🚨 for general emergencies, ⚠️ for warnings, ☢️ for hazardous materials, or 🌪️ for tornadoes) or employ clear infographic icons that visually signal the type of emergency at a glance. Incorporating both accessible formats and visual cues ensures every Canadian, regardless of communication needs, can understand and act on public alerts promptly and safely.[10]

23. Every mobile device must receive alerts in consistent, accessible formats, closing gaps caused by device or platform differences.

Why Accessibility Is Urgent

24. Across every province, interviewees reported that written alerts are inaccessible to ASL and LSQ users, who rely on sign language to understand urgent messages.[11]

25. Not one interviewee had ever seen an NPAS alert in ASL or LSQ on any platform (TV, radio, online, or mobile). The system's audio/text focus means Deaf people are excluded from life-saving information unless they depend on others or informal social networks.[8]

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[8] *Broadcasting Act* (S.C. 1991, c. 11).
[9] *Official Languages Act,* R.S.C., 1985, c. 31 (4th Supp.)
[10] Deaf Wireless Canada Committee (DWCC). (2025). *No One Left Behind: Deaf community interview insights & recommendations for accessibility in Canada's emergency public alerting system* (Prepared for TBNC CRTC Proceeding 2025-180).
[11] Deaf Wireless Canada Committee (DWCC). (2025). *No One Left Behind: Deaf community interview insights & recommendations for accessibility in Canada's emergency public alerting system* (Prepared for TBNC CRTC Proceeding 2025-180).

26. Broadcasters often omit interpreters or display them in a manner that prevents viewers from using them during emergencies. LSQ users face severe inequities.[3] In Quebec and New Brunswick, text-only alerts are the norm and regional differences mean unreliable LSQ access.[3]

27. ASL users reported a consistent pattern of exclusion from alerts, describing their reliance on hearing friends or community members for basic emergency information.[3] These failures are national, not local.

28. The system's audiocentric design excludes Deaf Canadians by ignoring their visual and linguistic communication needs.[3]

Broadcasting Act[12]: What Broadcasters Must Do

29. **DWCC Response:** Broadcasters must display alerts in both English and French onscreen, matching the official CAP message.

30. They must provide clear, visible ASL and LSQ interpretation, not just optional or minimized, but guaranteed. This includes minimum interpreter size, proper placement, and simultaneous display with the alert.

31. Updated conditions for broadcasters and exemption orders for digital and online platforms must require ASL/LSQ interpretation and bilingual text, and require adherence to visual accessibility standards (high-contrast text, clear, plain language, icons/infographics).

32. No matter how or where viewers receive alerts: TV, radio, mobile, web, standards must be the same.

National Alignment Is Essential

33. Partial, voluntary, or province-by-province approaches have failed.[3] People across Canada want unified, enforceable national standards for bilingual and accessible alerting, with ongoing compliance monitoring and consequences for providers who fail to meet these standards.

34. **DWCC Response:** Current law and practice do not guarantee timely, accessible emergency alerts for Deaf, DeafBlind, and Hard of Hearing Canadians. People using ASL and LSQ are routinely left out when it matters most. The Commission must adopt stricter rules under sections 24 and 24.1 of the Telecommunications Act[13] and update requirements for broadcasters under the Broadcasting Act[14]. Only a proactive, enforceable commitment,

[12] *Broadcasting Act* (S.C. 1991, c. 11).
[13] *Telecommunications Act* (S.C. 1993, c. 38), ss. 24, 24.1.
[14] *Broadcasting Act* (S.C. 1991, c. 11).

baked into regulation and governance, can ensure that all Canadians, regardless of language or communication modality, receive life-saving information when they need it.

Final Reflections:

35. Accessibility in emergency communication cannot depend on voluntary actions, fragmented provincial practices, or mere technology upgrades. The evidence shows that only enforceable standards, set by law and applied coast-to-coast, can prevent Deaf communities from being "**the last to know.**"[15] The Commission must establish mandatory requirements for bilingual and signed alerts under both the Telecommunications Act[6] and the Broadcasting Act,[16] ensuring accessible public safety is the rule, not the exception.

QUESTION 2

Q2. Can and should the NPAS technically or operationally support the distribution of public alerts in languages other than English and French, including Indigenous languages? Specifically:

36. **DWCC Response:** Interview participants consistently told us they have never received public alerts in ASL, LSQ, or Indigenous languages, only in English or French text. They emphasized that the current system excludes Deaf, DeafBlind, and newcomer communities from critical, potentially life-saving information. For example, every person we interviewed stated that they had never seen a public alert in sign language on any device or broadcast, regardless of where they live in Canada.[17]

37. LSQ users in Quebec and New Brunswick noted that alerts are sometimes available in French, but never in LSQ, even in officially bilingual or Francophone regions. This reveals fundamental gaps in access for French signers as well. Participants unanimously agreed that NPAS should offer alerts in more languages, including sign languages, to ensure that **no one is left out.**[17]

38. In DWCC's survey report, **55%** of the preferred languages for receiving public alerts among DHH respondents were primarily signed languages, while **45%** were written languages. For Deaf-Blind respondents, **54%** of preferred language selections were signed languages and **46%** were written languages.

39. The interviews and survey results highlight a significant accessibility gap in how DHH and Deaf-Blind individuals receive public alerts. As a result, they may miss critical safety

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[15] Deaf Wireless Canada Committee (DWCC). (2025). *No One Left Behind: Deaf community interview insights & recommendations for accessibility in Canada's emergency public alerting system* (Prepared for TBNC, CRTC Proceeding 2025-180

[16] *Broadcasting Act* (S.C. 1991, c. 11).

[17] Deaf Wireless Canada Committee (DWCC). (2025). *No One Left Behind: Deaf community interview insights & recommendations for accessibility in Canada's emergency public alerting system* (Prepared for TBNC, CRTC Proceeding 2025-180).

information, hindering their ability to respond quickly and navigate emergencies independently. Additionally, survey data suggests that preferences for signed (**55%**) versus written languages (**45%**) are almost equal. This indicates the need for multi-format alert systems to ensure equitable access for all members of DDBHH communities.

(a) Have EMOs considered whether, and how, to distribute public alerts in languages other than English and French using the NPAS? If not, why not? What challenges were identified in doing so?

40. **DWCC Response:** Based on interviews, emergency officials have not made serious efforts to provide alerts in ASL, LSQ, Indigenous, or newcomer languages. Participants described alerts as English-first, exclusively text-based, and inaccessible to many.[18]
    a. No interviewee, in any province, had ever received an ASL or LSQ alert.[7]
    b. Alice Dulude, an LSQ signer from Quebec, shared that alerts "rarely feature LSQ in real time," even in a bilingual province.[18]
    c. Wilma in New Brunswick received alerts only in English or French text, never in LSQ.
    d. ASL signers from Saskatchewan, Manitoba, and Ontario reported receiving tornado, weather, and Amber Alerts in English text, causing confusion and reliance on hearing family or friends for information.[18]
    e. Darryl Hackett from Ottawa often receives text-only alerts, mainly in English, and sometimes with delays, even in the national capital.[18]

41. Public alerting systems can be configured to support multiple language formats, including signed videos. Currently, public alerting systems offer wireless accessibility plans that ensure ASL and LSQ alerts are automatically delivered to those who have them. This ensures equitable access to and accessibility to preferred languages. However, DWCC is concerned by survey results indicating that 61% of DHH and 56% of Deaf-Blind respondents lack a wireless accessibility plan. This would leave a large portion of the community without reliable access to alerts, limiting their ability to receive them. *Full implementation requires expanding accessibility plans and effectively promoting them.*

(b) What is the feasibility, both technically and operationally, of the NPAS supporting additional languages? What technical barriers exist to supporting additional languages (e.g., language-specific character sets for alerting decoder devices, language-specific character sets for handsets, technical limitations of the NAAD System, Wireless Public Alerting [WPA] technical specifications, etc.)?
[The Commission is basically asking: "Is it technically possible to support more languages?]

[18] Deaf Wireless Canada Committee (DWCC). (2025). *No One Left Behind: Deaf community interview insights & recommendations for accessibility in Canada's emergency public alerting system* (Prepared for TBNC, CRTC Proceeding 2025-180).

42. **DWCC Response:** The interviews and examples indicate that NPAS can support additional languages and accessible formats; the barriers are organizational and policy-based, not technical.[19]
    a. A Deaf participant from BC described receiving a missile alert in South Korea, with immediate multilingual updates and clear visual instructions, proof that accessible, multilingual alert technology exists.[19]
    b. People expressed frustration with tiny, crowded, or unreadable text. Devices today can show images, videos, and Unicode text, so message design, not technology, is the fundamental limitation.[19]
    c. Several noted that TV broadcasters often shrink or omit sign language interpreters, despite picture-in-picture and video overlays being standard features on many devices.[19]
    d. Many interviewees requested ASL/LSQ videos, interpreter windows, and recognizable visual cues. These solutions are technically possible using existing technology and broadcaster tools.[19]

43. Overall, these accounts show that NPAS could efficiently deliver alerts in additional spoken and signed languages, plain-language visuals, and accessible formats. The obstacles are a lack of policy leadership and system design, not technical capability.[19]

44. Survey results demonstrate that 90% of DHH and 89% of Deaf-Blind respondents support a federal requirement to include sign language in all public alerts. 93% of DHH and 90% of Deaf-Blind respondents believe that sign language should be available in public alerts across all platforms.

QUESTION 3

Q3. What role can the Commission play in facilitating the distribution of alerts in languages other than English and French, including Indigenous languages? Should the Commission take additional regulatory measures to support the distribution of alerts in languages other than English and French, including Indigenous languages?

45. **DWCC Response:** Interview evidence makes it clear that without regulatory action, Canadians who rely on ASL, LSQ, Indigenous Sign Languages, and other languages will continue to miss out on timely and accurate emergency information. Across every province, participants shared that NPAS currently delivers alerts only in English and French text, lacking sign language content, Indigenous language options, and meaningful accessibility. Voluntary approaches have not worked. The Commission must act to ensure that multilingual and signed-language alerts are used, utilizing its authority under both the

[19] Deaf Wireless Canada Committee (DWCC). (2025). *No One Left Behind: Deaf community interview insights & recommendations for accessibility in Canada's emergency public alerting system* (Prepared for TBNC, CRTC Proceeding 2025-180).

Telecommunications Act[20] and the Broadcasting Act[21].

46. Findings show a fragmented system. LSQ users in Quebec face inconsistent access, while those in New Brunswick receive no LSQ at all. ASL users in Saskatchewan, Manitoba, and Ontario describe unreadable or delayed text-only alerts.[22] These gaps suggest that provincial emergency organizations are unable to reliably provide accessible, multilingual alerts independently.

47. The Commission can close these gaps by establishing national standards for multilingual and signed-language alerting. This will help ensure equal protection for Canadians regardless of province or language.

2. Imposing New Regulatory Measures for Alert Providers and Broadcasters

48. **Interview data points to the need for stronger rules. DWCC recommends new regulations because:**
    a. No participant had ever received NPAS alerts in ASL or LSQ.
    b. Broadcasters often omit interpreters or present them in cropped or unusable windows.
    c. LSQ users face unequal access depending on their province.
    d. Indigenous, newcomer, and multilingual Deaf participants reported receiving alerts only in English, often in difficult or inaccessible text.[22]

49. The Interview Report's "Final Reflections" stress that accessibility will not improve without mandatory standards and systemic change.[22]

50. **The Commission's powers allow for the following:**

    a. **Telecommunications Act[23]:** The Commission can require alert providers to support ASL, LSQ, and Indigenous sign-language video or linked content. The Commission can also standardize the delivery of multilingual and accessible formats. It ensures that alerts are provided in all languages issued by emergency authorities, not just English and French.

    b. **Broadcasting Act[24]:** The Commission can mandate clear, unobstructed interpreter windows for ASL, LSQ, and Indigenous Sign Languages. It can update exemption orders to ensure broadcasters meet accessibility rules and

[20] *Telecommunications Act* (S.C. 1993, c. 38), ss. 24, 24.1.
[21] *Broadcasting Act* (S.C. 1991, c. 11).
[22] Deaf Wireless Canada Committee (DWCC). (2025). *No One Left Behind.: Deaf community interview insights & recommendations for accessibility in Canada's emergency public alerting system* (Prepared for TBNC, CRTC Proceeding 2025-180)..
[23] *Telecommunications Act* (S.C. 1993, c. 38), ss. 24, 24.1.
[24] *Broadcasting Act* (S.C. 1991, c. 11).

require broadcasters to air multilingual audio, signed video, or visual summaries during emergencies.

51. These actions respond to real harm. Interviewees described being confused, uninformed, or dependent on others during emergencies.[25]

3. Set National Standards and Requirements for Sign Language Inclusion

52. The Commission can close these gaps by establishing national standards for multilingual and signed-language alerting. This approach helps ensure equal protection for Canadians, regardless of province or language. Just as the *Accessible Canada Act*[26] formally recognizes ASL, LSQ, and multiple Indigenous Sign Languages as valid languages for accessible communication, the CRTC can do its part by including these languages in its regulations.

53. The Commission should add ASL, LSQ, and Indigenous Sign Languages to the required list of languages for pre-recorded emergency alert videos, making them available alongside English and French. For example:
    a. a Deaf participant in Saskatchewan needed hearing relatives to explain tornado warnings due to missing ASL alerts.[25]
    b. LSQ users in Quebec and New Brunswick received no visual or signed emergency information.[25]
    c. a Deaf participant from BC highlighted how South Korea's system offers instant, multilingual, visually rich alerts, far surpassing Canada's current approach.[25]

54. These experiences show the need to make signed languages a core part of NPAS, not an optional feature. The Commission is best positioned to require this at the federal level.

4. Promoting Collaboration and System Modernization

55. The Interview Report confirms that NPAS's limitations lie in its system design, not in its technology.[25] CAP supports multimedia attachments, and modern devices can display video and Unicode. Broadcasters already have tools for interpreter windows.

56. **The Commission can do the following:**
    a. Require updates to the NAAD and WPA platforms to support linked ASL, LSQ, and Indigenous language content.
    b. Set deadlines for EMOs, alert providers, and broadcasters to comply.
    c. Foster partnerships with Indigenous Sign Language communities and Deaf representatives to create truly accessible emergency alerts.[25]

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[25] Deaf Wireless Canada Committee (DWCC). (2025). *No One Left Behind: Deaf community interview insights & recommendations for accessibility in Canada's emergency public alerting system* (Prepared for TBNC, CRTC Proceeding 2025-180).
[26] *Accessible Canada Act* (S.C. 2019, c. 10).

Conclusion

57. Yes, the Commission can and should take further regulatory steps to make sure emergency alerts reach Canadians in languages other than English and French, including ASL, LSQ, Indigenous Sign Languages, and other languages. Without enforceable national requirements, exclusion will persist. Making alerts multilingual and accessible in signed languages is essential to public safety, equality, and Canada's commitment to Deaf, DeafBlind, Hard of Hearing, Indigenous, newcomer, and multilingual communities.

QUESTION 4

Q4. Are there barriers to the accessibility of public alerts for persons with disabilities in Canada? If so, how can the NPAS be improved, and how can the Commission contribute to reducing or removing these barriers?

58. **DWCC Response:** Yes, participants described significant and widespread barriers that prevent many people from receiving clear, timely emergency alerts. Deaf, DeafBlind, Hard of Hearing, LSQ users, people who are blind or low-vision, and people with cognitive disabilities all shared stories of being excluded by the current system.[27] This is supported by survey results showing 56% of DHH respondents and 39% of Deaf-Blind respondents felt that the current public alerting system is not fully accessible. These challenges are present in every province and across all alerting platforms, including mobile phones, television, radio, and online.

Key Barriers Highlighted in the Interview Report

59. **No ASL or LSQ alerts anywhere in Canada** - Everyone interviewed reported never seeing a public alert in ASL or LSQ.
    a. Sign-language users are left out of life-saving information.[27]
    b. For example, ASL users in Ontario, Manitoba, Saskatchewan, and BC received only English text, so they had to rely on hearing people for details.[27]
    c. LSQ users in Quebec and New Brunswick had no LSQ access and less reliable French alerts, even in areas with an official language status.[27]

60. **Alerts rely on dense, English-heavy text, making them inaccessible.**
    a. NPAS alerts are filled with complicated, mostly English text, lacking plain language or alternative formats.
    b. Interviewees described small, cluttered, low-contrast text that is unreadable for users with low vision or cognitive differences.[28]

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[27] Deaf Wireless Canada Committee (DWCC). (2025). *No One Left Behind: Deaf community interview insights & recommendations for accessibility in Canada's emergency public alerting system* (Prepared for TBNC, CRTC Proceeding 2025-180).

[28] Deaf Wireless Canada Committee (DWCC). (2025). *No One Left Behind: Deaf community interview insights & recommendations for accessibility in Canada's emergency public alerting system* (Prepared for TBNC, CRTC Proceeding 2025-180).

c. Deaf newcomers from Syrian, African, and immigrant backgrounds found alerts impossible to understand because of written-language barriers.[29]

61. **Missing visual cues and iconography**
    a. Alerts rarely include images, symbols, colour codes, or recognizable icons for different emergencies.[29]
    b. Many could not tell if an alert was about weather, Amber Alerts, environmental hazards, or evacuations.[29]
    c. A DeafBlind participant noted that alerts "do not communicate urgency in any accessible way."[29]

62. **Broadcasts often lack visible or usable ASL/LSQ interpreters**
    a. TV alerts are often shown with no interpreters at all, or the interpreter is too small, cropped out, or hidden behind graphics.[29]
    b. Ontario and Quebec users reported that interpreters were cut off during emergency broadcasts.[29]
    c. Manitoba viewers said there were no sign interpreters or clear captions during crisis events, such as blizzards.[29]

63. **Alerts are mostly audio, excluding Deaf and DeafBlind users**
    a. Many alerts rely on sound, tones, radio announcements, or spoken instructions, with no visual or tactile options.[29]
    b. DeafBlind participants reported not receiving tactile or high-contrast alerts, so they relied on others for essential information.[29]
    c. ASL users in Saskatchewan explained they rely on friends to tell them about alerts, as the system is "sound-based first."[29]

64. **Rural, northern, and Indigenous communities often get late, missing, or English-only alerts.**
    a. People in rural and northern areas reported getting late or no alerts, and often only in English, even in Indigenous or multilingual regions.[29]
    b. Those in northern areas experienced delays or gaps in cell service.[29]
    c. Métis and First Nations Deaf participants saw no Indigenous-language or signed equivalents.[29]

65. **Survey results indicate that the four major barriers that DHH respondents face are:**
    a. Language accessibility is the most significant barrier - 58% respondents reported that the absence of public alerts in ASL or LSQ is a major barrier.
    b. 46% cite lack of visual notification, emphasizing that alerts must not rely solely on audio and this is especially important for those who rely on visual cues.
    c. 33% felt there were insufficient details.
    d. 31% highlighted no vibration or haptic alert as another barrier.

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[29] Deaf Wireless Canada Committee (DWCC). (2025). *No One Left Behind.: Deaf community interview insights & recommendations for accessibility in Canada's emergency public alerting system* (Prepared for TBNC, CRTC Proceeding 2025-180).

66. **Survey results indicate that the four major barriers that Deaf-Blind respondents face are:**
    a. Language accessibility is the most significant barrier - 58% respondents reported that the absence of public alerts in ASL or LSQ is a major barrier.
    b. 50% indicated that relying solely on audio is insufficient, highlighting the importance of visual cues.
    c. 38% identified the lack of tactile alerts (vibration or haptic) as a barrier.
    d. 38% reported the absence of images reduces the effectiveness of alerts.

67. DHH and Deaf-Blind respondents reported similar barriers, however, Deaf-Blind respondents placed greater emphasis on the lack of vibration and haptic alerts compared to the DHH respondents. Interestingly, Deaf-Blind respondents highlighted the lack of images for missing persons as a barrier, whereas DHH respondents focused more on insufficient details.

How NPAS Can Be Improved (Based on Interview Findings)

68. Integrate ASL and LSQ into every alert pathway
    a. Provide ASL/LSQ video translations for all alerts.
    b. Include embedded or linked sign-language content in digital alerts.
    c. Require broadcasters to display interpreters at a visible and usable size.

69. Adopt plain language and an accessible visual design.
    a. Use simple, easy-to-read text designed for people with cognitive disabilities.
    b. Display icons, symbols, and clear visuals to show alert type and urgency.
    c. Design with high contrast for low-vision users.[30]

70. Support tactile, vibration, and multi-modal delivery for DeafBlind users
    a. Use standardized vibration alerts.
    b. Offer high-contrast text and tactile cues.
    c. Integrate haptic notifications across broadcast and mobile alerts.[30]

71. Provide Indigenous language support and community-driven translation.
    a. Enable Indigenous-language text or audio overlays.
    b. Support Indigenous emergency organizations in issuing multilingual alerts.[30]

72. Ensure consistency across regions and platforms.
    a. Enable Indigenous-language text or audio overlays.
    b. Support Indigenous emergency organizations in issuing multilingual alerts.[30]

73. Establish mandatory national accessibility standards under both Act
    a. Impose requirements for ASL/LSQ interpretation on TV alerts, bilingual and sign-language support on mobile alerts, tactile and visual cues, and uniform

accessibility formatting.[30]

74. Mandate accessible design in alert specifications.

a. Require plain-language text, icons, and sign-language links in all alerts.[30]
b. Upgrade systems like NAAD and WPA to handle multimedia content and Indigenous languages.[30]

75. Monitor, enforce, and require compliance across all agencies.

a. Voluntary efforts have failed. Enforceable rules are necessary for real equality.[31]

76. Engage disability communities as permanent advisors.

a. Ongoing consultation with Deaf, DeafBlind, LSQ, Indigenous, and accessibility experts will ensure policies stay aligned with real needs.[31]

77. Interview evidence reveals overwhelming, systemic barriers, such as missing sign languages, unreadable text, inaccessible broadcasts, lack of tactile access, and significant regional disparities. These failures put people with disabilities at risk during emergencies. NPAS can be truly accessible by adopting an inclusive, multimodal, and multilingual design, robust sign-language integration, and consistent visual and tactile features. The Commission has a real opportunity to eliminate these barriers, establish robust national accessibility standards, and ensure that every alerting pathway is genuinely accessible to all.[3]

78. Survey results indicated that DHH and Deaf-Blind respondents selected similar accessible formats for public alerts, suggesting aligned accessibility needs across both groups. The four major results are shown below:
    a. 79% DHH respondents and 69% Deaf-Blind respondents selected text captions
    b. 75% DHH respondents and 68% Deaf-Blind respondents selected ASL and LSQ
    c. 69% DHH respondents and 64% Deaf-Blind respondents selected vibration alerts
    d. 59% DHH respondents and 49% Deaf-Blind respondents selected flashing-light alerts

79. Overall, 86% of DHH respondents and 86% of Deaf-Blind respondents reported having received a public alert. The most frequently received public alerts were AMBER alerts, system test alerts, and weather-related emergency alerts. The table below shows the percentage breakdowns of 2,736 responses from DHH respondents and 408 responses from Deaf-Blind respondents.

Type of Alerts	DHH	Deaf-Blind
AMBER	29%	26%

[30] Deaf Wireless Canada Committee (DWCC). (2025). *No One Left Behind.: Deaf community interview insights & recommendations for accessibility in Canada's emergency public alerting system* (Prepared for TBNC, CRTC Proceeding 2025-180).

Test	25%	24%
Weather	19%	18%
Natural Disaster	9%	10%
Civil Emergency	8%	9%
Emergency	7%	9%
Environmental/Technological	4%	4%

80. Survey results show that 39% of DHH and 34% of Deaf-Blind respondents expressed dissatisfaction with the information included in public alerts, highlighting gaps in clarity and accessibility. 84% of DHH respondents and 70% of Deaf-Blind respondents reported that having ASL or LSQ video explanations would enhance alert information. The emphasis highlights the importance of expanding language accessibility in public alerts.

81. Survey results also indicated additional information that DHH and Deaf-Blind respondents require in order to have greater satisfaction with the information provided in public alerts. 67% of DHH respondents wanted links to shelter and safety resources, 65% required a plain-language description of the emergency, 64% wanted contact information, and 64% needed to know where to access for ongoing updates. Deaf-Blind respondents reported different priorities: 66% wanted contact information, 66% required accessibility support information, 64% required plain-language description of the emergency, and 59% wanted links to shelter and safety resources.

QUESTION 5

Q5. How can the Commission help improve the availability of public alerts? Specifically:

- **(a) Where are the current gaps in accessing WPA in rural, remote, and Indigenous communities in Canada, and how can such gaps be efficiently tracked?**
- **(b) What is the feasibility, technically or otherwise, of creating and operating a national mobile application available for download across Canada, as a possible solution for reducing gaps in WPA?**
- **(c) Should WSPs be required to provide alerting over 3G networks? What technical or economic challenges exist to doing so?**
- **(d) How can the Commission improve the current reach of WPA to rural, remote, and Indigenous communities in Canada through regulatory measures? What other means should the Commission consider to support the distribution of public alerts to Canadians that WPA does not currently serve?**

82. Interview findings show that Canada's current alerting system leaves rural, remote, northern, and Indigenous communities with unequal, delayed, or missing access to Wireless Public Alerting (WPA). Participants in many provinces reported inconsistent cell coverage,

English-only alerts, missing visual formats, and a lack of alternatives when mobile alerts fail. DWCC submits that the Commission has a central role in improving WPA so that all Canadians have equal access to life-saving communication.

1. Current Gaps in WPA Access and How to Track Them

83. The Interview Report[31] highlighted persistent gaps in WPA access for rural and remote communities:

a. **Delayed or missing alerts.** Many participants in northern and rural areas received alerts late or not at all. Some people only learned of emergencies from social media or by hearing about them from others nearby.[31]
b. **English-only alerts in Indigenous regions.** Deaf and Hard of Hearing Indigenous interviewees received alerts only in English, without French, Indigenous languages, or ASL/LSQ support. This means important information can be missed just because of language barriers.[31]
c. **Weak or unreliable cellular infrastructure.** Several described rural areas with "patchy towers" and frequent alert failures due to weak wireless signals.[31]
d. **No accessible alternative when WPA fails.** Many said there were no backup options in visual, tactile, or offline formats, leaving their safety dependent on unstable mobile networks.[31]

Efficient Ways to Track These Gaps:

84. DWCC recommends that the Commission require:

a. Mandatory reporting whenever WPA delivery fails or service outages occur.
b. Geographic WPA performance mapping, focusing on rural and Indigenous regions.
c. **Community-based reporting mechanisms,** so Indigenous governments, rural municipalities, and DDBHH organizations can directly flag alert gaps.
d. Annual accessibility audits by Wireless Service Providers (WSPs) and broadcasters.

2. Feasibility of a National Alerting Mobile App

85. There is strong support from interviewees for more accessible alert channels that include visual, tactile, and sign-language formats. A national mobile app is entirely feasible and addresses many barriers:

a. **Feasibility** An interviewee[31] described South Korea's mobile alert system, which used symbols, plain language, and clear visuals to deliver multilingual alerts. This

[31] Deaf Wireless Canada Committee (DWCC). (2025). *No One Left Behind.: Deaf community interview insights & recommendations for accessibility in Canada's emergency public alerting system* (Prepared for TBNC, CRTC Proceeding 2025-180).

shows accessible technology is possible.[32]

86. A Canadian app could provide ASL/LSQ video, icons, high-contrast displays, and vibration alerts, features not currently available with WPA. Apps in other countries already deliver key warnings for weather, wildfires, or tsunamis.[32]

87. Operational Advantages - A national app could serve as:

a. A backup when WPA fails.
b. A central source for alerts in ASL, LSQ, and Indigenous languages.[32]
c. An accessible platform for DeafBlind tactile formats.
d. iv. A resource for plain-language summaries and visual infographics.[32]

88. Such an app would add to, not replace, WPA, and strengthen Canada's alerting system.

3. Should WSPs Provide Alerts Over 3G Networks?

89. DWCC Response: Yes, WSPs should provide alerts on 3G networks whenever these are still used in rural, remote, or Indigenous communities.

a. Interview data[32] show that many rely on older devices and networks because of affordability or unreliable coverage.
b. Many Indigenous communities still use 3G-only devices or Wi-Fi–limited devices.
c. Excluding those dependent on 3G would further widen safety gaps.

90. Technical and Economic Considerations:

a. WSPs may say maintaining older networks is expensive, but evidence shows 3G is still a lifeline in many remote areas.

b. The Commission could implement temporary requirements for 3G alerting, mandated notification periods before any sunset, and provide funding or partnership programs for device upgrades in Indigenous communities.

4. How the Commission Can Improve WPA Reach to Rural, Remote, and Indigenous Communities?

91. Interview data[32] highlight inequities in WPA's reach. The Commission can reduce barriers by:

a. **a. Mandating coverage and performance standards**
   i. i. Require WSPs to maintain minimum WPA availability in underserved regions.
   ii. ii. Link regulatory compliance to data that actually shows alerts are being successfully delivered.
b. **b. Supporting infrastructure expansion**

[32] Deaf Wireless Canada Committee (DWCC). (2025). *No One Left Behind.: Deaf community interview insights & recommendations for accessibility in Canada's emergency public alerting system* (Prepared for TBNC, CRTC Proceeding 2025-180).

i. i. Collaborate with Indigenous governments to identify coverage gaps.
ii. ii. Require WSPs to develop and submit regional WPA accessibility plans.

c. **Requiring multiple accessible alert pathways**
Interview data[33] show that WPA alone is not enough for:
i. Deaf, DeafBlind, and Hard of Hearing Canadians
ii. Newcomers[33]
iii. LSQ and ASL users
iv. Indigenous language users[33]
v. Rural residents with weak coverage[33]

92. **Therefore, the Commission should also require:**
a. TV and radio broadcasters to provide consistent ASL/LSQ interpretation and visual accessibility.[33]
b. Multilingual alerts, including Indigenous languages.
c. Mandatory sign-language video integration via CAP links or broadcaster overlays.[33]
d. Plain-language and visual icon standards.[33]

93. **d. Funding and support for Indigenous-led alerting**
i. Indigenous communities need the ability to send multilingual alerts via existing NPAS pathways.

ii. The Commission can enable this through partnerships with Indigenous emergency management organizations and funding for local alerting solutions.

94. Interview evidence[33] shows WPA availability is inconsistent and inaccessible in many rural, remote, and Indigenous communities. Late, missing, English-only, or unreadable alerts are compounded by weak wireless infrastructure and a lack of ASL, LSQ, tactile, and Indigenous-language options.[33]

95. Improving NPAS requires multiple alerting pathways, accessibility in various languages and formats, upgrades to rural infrastructure, and mandatory standards for all providers. DWCC believes the Commission can significantly enhance alert availability through robust regulations, accessible delivery channels, and ongoing collaboration with Indigenous and disability communities.

[33] Deaf Wireless Canada Committee (DWCC). (2025). *No One Left Behind.: Deaf community interview insights & recommendations for accessibility in Canada's emergency public alerting system* (Prepared for TBNC, CRTC Proceeding 2025-180).

QUESTION 6

Q6. Is the Commission's existing visible public alert testing framework, including the timing and frequency of visible test alerts, appropriate? Specifically:

- **(a) Is the biannual visible public alert test schedule still appropriate and in the public interest? Provide supporting rationale for why or why not and, if not, what changes are needed.**

96. **DWCC Response:** The current biannual visible public alert test schedule is insufficient to meet the accessibility needs of DHH and Deaf-Blind Canadians. Survey results show that 81% of DHH and 84% of Deaf-Blind respondents have received a test public alert. 77% of DHH respondents and 77% of Deaf-Blind respondents expressed a desire to provide feedback on these alerts through a button on alert notifications, email, and text messaging. While alerts are being delivered, there is no mechanism for users to report accessibility issues or improvements that would enhance the public alerting system.

97. The five main reasons in order of importance for respondents to be able to provide feedback are:

    <u>DHH Respondents</u>
    1) To ensure alerts are delivered in accessible formats
    2) To raise awareness about accessibility issues in emergency communication
    3) To verify that the alerts are effective for DHH individuals
    4) To support the development of more inclusive public safety system
    5) To educate about the specific needs of the DHH community

    <u>Deaf-Blind respondents</u>
    1) To ensure alerts are delivered in accessible formats
    2) To verify that the alerts are effective for DHH individuals
    3) To raise awareness about accessibility issues in emergency communication
    4) To support the development of more inclusive public safety system
    5) To educate about the specific needs of the DHH community

98. While reasons overlap, Deaf-Blind respondents placed greater emphasis on the effectiveness of alerts for their community, whereas DHH respondents focused more on accessibility barriers in emergency communications.

99. Due to the unique sensory needs of Deaf-Blind individuals, alerts must be delivered across all of their devices and vibration or haptic signals need to be strong and easily detectable so they can navigate the information effectively and independently. However, such technologies are not always widely available or standardized, which means they face a higher likelihood of missing alerts compared to DHH individuals. This is reflected in survey findings showing 5% of Deaf-Blind respondents reported receiving no alerts, compared to 3% of DHH respondents.

100. Most respondents, 87% DHH and 81% of Deaf-Blind individuals, have both Wireless and Internet access, indicating strong potential to reach these communities through accessible digital alerting. Their responses indicate they primarily rely on Apple iPhones, Androids, and Tablets.

	Deaf and Hard of Hearing	Deaf-Blind
Apple iPhone	51%	47%
Android	19%	20%
Tablet	16%	19%

101. Additional platforms include television, social media, email or text messaging from government sources, and Emergency Alert apps.

	Deaf and Hard of Hearing	Deaf-Blind
Television	22%	18%
Email/Text Messaging	19%	16%
Social Media	17%	16%
Emergency Alert app	16%	16%

102. Given the accessibility barriers and lack of current mechanism for user feedback, biannual testing does not provide sufficient opportunities to evaluate and improve accessibility features. A quarterly testing is necessary to:
    a. incorporate user feedback once such mechanisms are implemented
    b. evaluate and improve delivery in accessible formats such as sign language videos, enhanced vibration and haptics, and flashing-light alerts
    c. identify and address accessibility gaps in a timely manner

103. Increasing testing frequency and integrating feedback mechanisms is in the public interest, ensuring all Canadians, including DHH and Deaf-Blind individuals, can receive and respond to such alerts effectively, thereby enhancing the safety and inclusivity in Canada's public alerting system.

(b) Do EMOs, LMDs, and the NAAD System operator require further flexibility with regards to the timing and frequency of visible NPAS testing? If so, what new or modified regulatory measures are appropriate to enable that flexibility?

QUESTION 7

Q7. What are technical, regulatory, or other solutions that the Commission could implement to ensure that LMDs are connected to the NPAS and distribute alerts to the public? Specifically:

- **(a) What technical or other solutions could the Commission, the NAAD System, or the telecommunications and broadcasting industries implement to detect and validate LMD connection to the NPAS automatically?**

- **(b) What tools (including regulatory measures) should the Commission use to streamline the verification and monitoring of LMDs' NPAS requirements? For instance, what kinds of standardized forms or evidence should LMDs provide to the Commission to demonstrate that they have established and are maintaining a connection with the NAAD System and disseminating alerts to the public in accordance with any applicable requirements?**

104. **DWCC Response:** Our survey and interview evidence show that many Deaf, DeafBlind, and Hard of Hearing (DDBHH) Canadians either miss alerts altogether or receive alerts that are not accessible, indicating that last-mile distributors (LMDs) are not consistently connected to NPAS in a way that delivers usable alerts.

105. The DWCC, therefore, recommend that the Commission pair technical monitoring with clear regulatory obligations, using an accessibility lens.

(a) Technical or other solutions to detect and validate LMD connection to NPAS automatically

106. Centralized NPAS compliance and alert-history hub

a. Build the national emergency alert hub proposed in the DeafBlind report, and use it not only as an accessible archive for the public, but also as the system of record for LMD connectivity and performance.
b. Each LMD's alerting system should send automatic status "heartbeats" and delivery logs to this hub whenever an NPAS alert is issued, including timestamp, alert ID, platforms used, and any failures. This allows the Commission and Public Safety Canada to see, in real time, which LMDs are connected and which paths are failing.

107. Automated end-to-end testing and multi-disability test task force

a. Implement regular automated end-to-end test alerts that traverse NAAD, LMD systems, and end-user devices, with results reported back to the hub.
b. As proposed in the DeafBlind survey, create a multi-disability testing task force that includes DDBHH representatives to participate in these tests, review logs,

and flag gaps in delivery and accessibility that are not visible from network telemetry alone.

108. Standardized device-level feedback and delivery reporting

a. Our DHH and DeafBlind surveys show that roughly four-fifths of respondents have received test alerts and a large majority want to give feedback, with a strong preference for a simple button on the alert notification, followed by email or text.
b. LMDs should be required to support an “I received / I did not receive / accessibility problem” feedback button embedded in test alerts, which returns anonymized device-level delivery and accessibility data (for example, whether vibration fired, whether captions displayed) to the NPAS hub. This provides a user-side cross-check against LMD self-reporting.

109. Accessible alert archive and replay tools

a. As recommended in the DHH report, require LMDs to feed copies of all alerts and associated metadata into an accessible national archive with replay controls.
b. This allows the Commission to verify the exact content and format that was distributed, including whether ASL or LSQ links, captions, and visual cues were present.

110. Accessibility-aware quality-of-service (QoS) metrics

a. Technical monitoring should not only measure “whether something went out,” but also whether it went out in accessible formats.
b. Using our survey indicators of key accessibility features (text captions, ASL/LSQ video, vibration, flashing lights), regulators can define QoS metrics such as:
    i. percentage of alerts with working vibration and visual signals
    ii. percentage with ASL/LSQ links or videos
    iii. The percentage that remains available in the archive for later review.

(b) Regulatory tools and standardized evidence for verification and monitoring

111. To streamline verification and monitoring of LMDs’ NPAS obligations, the Commission should combine licence conditions, standardized reporting, and public accountability.

a. Conditions of service/conditions of licence linked to accessibility
    i. For broadcasting and telecom LMDs, NPAS connectivity and accessible alert delivery should be explicit conditions of licence or service, anchored

in the Accessible Canada Act[34] and the 2023 Policy Direction[35] items 2(d) and 17(c) on accessibility and barrier removal.

ii. Conditions should reference concrete obligations: connection to NAAD, support for visual and tactile alerting, and inclusion of ASL/LSQ content or links where mandated.

b. Standardized NPAS compliance form and annual certification.

112. The Commission could require each LMD to file a yearly NPAS Accessibility and Connectivity Compliance Report that includes:

a. Technical diagrams of how NPAS alerts flow through their systems to each platform (wireless, IPTV, cable, satellite, streaming)

b. Evidence that their systems have passed end-to-end NPAS tests, including logs from the national hub and test results from the multi-disability task force.

c. A checklist confirming support for key accessibility features identified in our DHH and DeafBlind surveys: captions, ASL/LSQ video or links, vibration and haptics, high-contrast visual design, and compatibility with screen readers and Braille devices.

d. Statistics on test alert delivery success, broken down by region, device class, and accessibility feature.

113. Standardized evidence templates for individual alert incidents

a. For significant failures or major emergencies, the Commission could require LMDs to submit a short incident template containing:

i. Alert ID and time received from NAAD

ii. Time is injected into each distribution system, and any delays or outages

iii. Copies or screenshots of the alert as actually displayed on representative devices and platforms, including ASL/LSQ components and accessibility features

iv. Summary of any complaints or user feedback received through the in-alert feedback button, email, or text, including accessibility complaints highlighted in our surveys.

114. Accessible national feedback and complaints portal

a. Implement the accessible feedback portal recommended in the DeafBlind report, where DDBHH users can report NPAS failures, missing alerts, and accessibility problems in ASL, LSQ, text, or braille-compatible formats.

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[34] *Accessible Canada Act* (S.C. 2019, c. 10).

[35] Government of Canada. (2023). *Order issuing a direction to the CRTC on a renewed approach to telecommunications policy (SOR/2023-23), ss. 17, 21.* https://laws.justice.gc.ca/eng/regulations/SOR-2023-23/FullText.html

b. The Commission can use these data, alongside LMD filings, as an independent cross-check on whether LMDs are actually meeting their NPAS obligations in practice.

115. Audits, enforcement and public reporting
    a. Conduct periodic accessibility-focused NPAS audits of selected LMDs, using logs from the hub, user feedback, and spot tests with DDBHH participants.
    b. Where serious gaps are found, the Commission should have the authority to impose corrective action plans, conditions, or administrative penalties.
    c. Publish an annual public NPAS Accessibility Performance Report that compares LMDs on connectivity and accessibility performance. This creates transparency and gives DDBHH Canadians a clear view of which providers are reliable partners in public safety.

116. In summary, monitoring whether LMDs are “connected to NPAS” must go beyond network pings and include accessibility outcomes. The combination of a centralized alert hub, automated testing, user feedback loops, and structured regulatory reporting would give the Commission a practical toolset to verify that LMDs are both technically connected and delivering alerts that DDBHH Canadians can actually receive, understand, and act on.

Final Closing Comments

117. With the interviews and surveys, Canadian DDBHH have now documented the problems, issues, and challenges they face in public alerting.

118. The CRTC should explicitly require Public Safety Canada (PSC), Pelmorex, and Alert Ready to jointly create a library of pre-recorded ASL and LSQ videos covering a comprehensive range of emergencies, with another set of videos with clear, step-by-step safety instructions tailored to different scenarios. This would address issues faced by individuals, such as someone from British Columbia unfamiliar with tornado safety in Ontario, by providing direct, situation-specific guidance. All public alerts could then include simple shortlinks (e.g., bit.ly links) that lead to YouTube videos on the PSC webpage for easy access by Deaf, DeafBlind, and Hard of Hearing users.

119. During the pandemic, the lack of consistent, accessible sign language interpretation on public broadcasts left many in the DDBHH community unable to access critical health and safety information. The failure to provide always-visible, appropriately sized interpreters needs urgent correction, especially now that recent surveys and interviews have documented the ongoing accessibility gaps.

120. Guided by this evidence, the CRTC must also open a proceeding to set national standards for on-screen interpreters, covering aspects such as visibility, size, and placement, especially with on-screen text overlays, and fund a pilot project to ensure accessible broadcasting and public alerting that includes all DDBHH Canadians.

121. The DWCC thanks the Commission for the time to read our submissions, which the team enjoyed collaborating to produce for your analysis. This was an important topic presented with an accessibility lens for which we wish the Commission to ensure that no one is left excluded from fully benefiting from accessible telecommunications and broadcasting services. The Commission must produce a regulatory policy that ensures that rejects audiocentric approaches and guarantees that ***"No one is left behind."***

Respectfully submitted,

Jeffrey Beatty,
Chairperson,
Deaf Wireless Canada Consultative Committee – DWCC

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