



Deaf Wireless Canada Consultative Committee
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VIA EMAIL DISTRIBUTION and GC KEY

September 30, 2025

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

Reference: [11011-NOC2025-0094](#) and [1011-NOC2025-0180](#)

Dear Secretary General,

Re: Procedural Request – CRTC 2025-94 and CRTC 2025-180 (Deaf-Blind Accessibility)

[TBNC CRTC 2025-94](#) Call for comments - **A new approach to funding public interest participation in Commission proceedings**

[TBNC CRTC 2025-180](#) Call for comments – **Improving the public alerting system**

1. The Deaf Wireless Canada Consultative Committee – Comité pour les Services Sans fil des Sourds du Canada (DWCC-CSSSC or “**DWCC**”) writes to respectfully notify the Commission that it requests an extension for the Reply phase of the proceeding based on developments in relation to interventions submitted for this proceeding.
2. **DWCC** has submitted an intervention in the proceeding [TBNC CRTC 2025-94](#), **A new approach to funding public interest participation in Commission proceedings**. The team has been reading each of the 52 interventions in depth to participate in the Reply phase, providing their comments.

3. In this specific proceeding regarding funding public interest participation, Bell, Inc. submitted an intervention by the proceeding's deadline of September 9, 2025.
4. On September 27, 2025, DWCC members read Bell's specific intervention document and discovered the following:
 - DWCC has been named 39 times.
 - DBPC has been named 22 times.
 - CNSDB has been named 19 times.
 - Jessica Sergeant has been named 3 times.
 - Leonor Vlug has been named 2 times.
 - Jeffery Beatty has been named 3 times.
5. While DBPC and CNSDB are not currently named as interveners in the proceeding, as they have not intended to participate in this proceeding, they are now aware of the Bell intervention document, which has changed their stance.
6. The scale and frequency of comments and mentions of the two organizations by Bell in its intervention have heightened the awareness of the letter among the two organizations and prompted their involvement.
7. It is essential to note that this matter was initiated by Bell's approach in responding, and would not have been brought forward otherwise.

Comment

8. **DWCC** believes it is unfair to participate and make comments on behalf of the DBPC and CNSDB without providing them with the opportunity to comment or provide input on how to respond to interveners who mention their organizations. **DWCC** will not make comments in the absence of the two organizations.
9. **DBPC** and CNSDB have now been made aware of Bell's intervention submission.
10. After reading it, **DBPC** and **CNSDB** believe they must join the **DWCC** to respond to and address the comments where they are specifically mentioned.
11. **DWCC** has agreed to form a partnership with DBPC and CNSDB for the reply phase. Each of the organizations, commenting as CDBC.VRS, will respond after this letter has been submitted.

12. Unfortunately, Bell has failed to acknowledge the challenges of people with dual disabilities, such as Deaf-Blind individuals, who live with both deafness and blindness and who rightfully participate in public interest groups.
13. Deaf-Blind Canadians, specifically members of the DBPC and the CNSDB, have an interest in the outcome of the proceeding because various topics influence decisions regarding accessibility in Canadian telecommunications and broadcasting policies, and they must therefore provide input on their participation in society.

Request for CRTC 2025-94

14. **DWCC** formally requests that the Commission grant permission to include the DBPC and CNSDB in the proceeding BTNC 2025-94, allowing them to participate and provide a joint response in the Reply phase. This permission will allow them to respond to the Bell intervention.
15. With Deaf and Deaf-Blind members of DBPC and CNSDB, it necessitates time to read the 64-page document, allows for translanguaging and discussions, and some other relevant interventions, thus requiring an extension.
16. **DWCC** formally requests that the Commission extend the Reply deadline for **BTNC 2025-94** to **November 9, 2025**.

Chilling effect for CRTC 2025-180

17. **DWCC** is participating in [TBNC CRTC 2025-180](#), and as of September 27, 2025, there is a historic count of **104 Deaf-Blind responses** for the survey on improving the National Public Alerting System.
18. DWCC has a Deaf-Blind Community Connector consultant working hard to promote the survey, including collecting paper copies, to be completed with intervenor access. With Bell's letter, **DWCC** now feels a chilling effect as a direct impact of Bell's response in this concurrent proceeding.
19. The Committee discussed with the Deaf-Blind consultant, who recommended doing a separate survey report with a Deaf-Blind focus, separating the Deaf-Blind survey respondents from the Deaf and Hard of Hearing participants, and this would require a deadline extension to allow the Deaf-Blind author a chance to learn the regulatory process and format for an evidential report.

20. The Deaf-Blind community faces distinct and intersectional barriers that differ substantially from those experienced by Deaf, Hard of Hearing, or blind communities alone. Preparing a dedicated report ensures that their lived experiences, accessibility requirements, and policy priorities are fully recognized rather than being generalized within broader disability categories.
21. Deaf-Blind Canadians often require unique accessibility measures, such as intervenor support, tactile communication, and specialized technologies, which are rarely addressed in mainstream policy discussions.
22. By producing a report focused explicitly on Deaf-Blind perspectives, regulators, policymakers, and service providers can gain a clearer understanding of these intersectional challenges and develop targeted, equitable solutions.
23. This approach affirms the principle of “Nothing About Us Without Us,” ensuring that Deaf-Blind voices are represented in their own right and that decisions reflect their specific realities, **particularly when they are the last to know and isolated in emergencies.**
24. **DWCC** is deeply concerned that Bell Canada’s filing once again singles out our organization, portraying necessary accessibility measures as “excessive” or “abusive.” This is not an isolated critique but part of a recurring and systematic pattern of discrimination against equity-seeking groups whose participation requires accessibility support. The Accessible Canada Act empowers the Commission to identify, remove, and prevent such barriers in its regulatory and policymaking functions.
25. By permitting industry to frame accessibility costs as unreasonable, the Commission risks reinforcing attitudinal barriers that the ACA and the 2023 Policy Direction were explicitly designed to dismantle. The Commission must do a better job of upholding its statutory obligations, ensuring that equity-seeking communities are not chilled or dissuaded from participating because their accessibility needs are mischaracterized as burdens. **DWCC** is being administratively burdened by responding to these systemic barriers, taking time away from our consultative and policy development work. This burden is itself a barrier under the Accessible Canada Act, one that the Commission has a duty to recognize and prevent.

Request specifically for 2025-180

26. **DWCC** formally requests that the Commission extend the Intervention deadline to **November 21, 2025.**

27. This change enables the DWCC team to complete our work on 2025-94 and then turn to assist the new report writer with the Deaf-Blind Public Alerting Survey Analysis Report.

Closing Summary

28. To recap:

- a. For CRTC 2025-94 **DWCC** seeks approval for the **joint submission** in the Reply to Interventions phase, as well as an extension to **November 9, 2025**, for the Reply document to be submitted with the inclusion of Deaf-Blind participants.
- b. For CRTC 2025-180, DWCC seeks an extension of the intervention Deaf-Blind Analysis Report on Public Alerts to **November 21, 2025**.

29. **DWCC** appreciates a response by Friday, October 3, 2025, confirming that the above timelines are approved, so DWCC can proceed with separating the Deaf and Hard of Hearing survey data from the Deaf-Blind survey data.

30. Please do not hesitate to contact us if you require any further clarification.
Administratively burdened

Respectfully submitted,

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

CC:

Megan McHugh, President, CNSDB

Terri Nolt, Chairperson, Chair, DBPC

Nanao Kachi, CRTC

Laura LeClerc, Legal Counsel, CRTC

Leila Wright, Vice-President, Telecommunications, CRTC

Adam Scott, Vice-Chairperson, Telecommunications, CRTC

Phillip Gauvin, Bell, Inc.

Stephanie Cadieux, Chief Accessibility Officer, Office of Accessibility

Melanie Joly, Ministry of Innovation, Science and Economic Development (ISED)

Monica Auer, Forum for Research and Policy in Communications (FRPC)

Geoff White, Public Interest Advocacy Centre (PIAC)

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