



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

Nov 17, 2025

Mr. Marc Morin

Secretary-General

Canadian Radio-telecommunications and Telecommunications Commission (CRTC)

sec-gen@crtc.gc.ca

Public record: [1011-NOC2025-0094](https://www150.comptons.gc.ca/150.noc/150.noc.do?method=showRecord&recordId=1011-NOC2025-0094)

Dear Secretary General,

Re: [BTNC 2025-94](#) Call for comments – A new approach to funding public interest participation in Commission proceedings - Procedural Support – Request to Reopen CRTC 2025-94 (Ontario Library Association)

1. The **Deaf Wireless Canada Consultative Committee (DWCC)** received a procedural letter from the **Ontario Library Association (OLA)** on November 15, 2025, concerning Telecom Notice of Consultation CRTC 2025-94.
2. The DWCC is writing in support of this procedural request submitted by the OLA concerning the developments that occurred after the close of record on October 9, 2025, including the **Broadcasting Participation Fund (BPF) ceasing intake after October 24, 2025**. The record introduced new considerations that materially affect public interest participation, particularly for accessibility organizations, Indigenous intervenors, and small non-profit sectors.
3. DWCC agrees that these new circumstances warrant **reopening the consultation** and adding a **Final Comments stage**, as the structural and financial barriers exposed by the shutdown of the BPF could not have been fully addressed earlier in the proceeding. DWCC outlines the rationales as follows:

1. Impact of BPF Shutdown on Accessibility Intervenors

4. The abrupt cessation of BPF intake created immediate risks and barriers for accessibility organizations. Many public interest groups, including DWCC, now have to rely exclusively on the CRTC's **telecommunications expense claim process**, which has:
 - a **30-day filing deadline**,
 - the possibility of **respondent challenges**, and
 - unfamiliar administrative requirements for organizations that previously used the BPF.
5. This represents a significant shift in risk and cost exposure that was not foreseeable during the original comment and reply phases.

2. Need to Extend the Cost-Claim Deadline to 60 Days

6. The **30-day deadline** in the telecommunications expense process presents a substantial accessibility barrier, particularly when several CRTC proceedings overlap. For small, under-resourced organizations supporting the Deaf, DeafBlind, and Hard of Hearing (DDBHH) community, this timeline is not workable.
7. DWCC supports OLA's request to adopt a **minimum 60-day deadline**, which is more consistent with capacity realities and accessibility obligations under federal frameworks, including:
 - the **Accessible Canada Act**,
 - the **CRTC 2023 Policy Direction** (items 2(d) and 17(c)), and
 - principles of genuine equity for public participation.

3. Removing Respondent Challenges to Prevent Conflict-Based Deterrence

8. DWCC supports the request to remove the role of respondent companies in challenging public interest cost claims.
9. Allowing regulated entities to challenge the cost recovery of intervenors who oppose their positions creates:
 - a **structural conflict of interest**,
 - a deterrent effect similar to **SCAPP-style challenges**, and

- disproportionate pressure on accessibility organizations that already face financial precarity.

10. A cost-claim process intended to support equitable participation should not permit mechanisms that undermine it.

4. Supporting the Need for a Premium / Surcharge to Reflect Financial Risk

11. DWCC also supports exploring a **premium compensation mechanism**, as proposed by OLA, to reflect:

- debt servicing costs,
- delayed reimbursement timelines,
- partial payment or non-payment risks, and
- administrative burdens not borne by respondent companies.

12. These real-world financial impacts disproportionately harm Indigenous, disability-led, and public-interest groups.

5. Importance of Meaningful Consultation for Indigenous and Accessibility Intervenors

13. Given the limited stages in this proceeding and the profound change in reimbursement conditions after the close of record, reopening the consultation to include a **Final Comments stage** is consistent with the principles of:

- procedural fairness,
- accessibility, and
- the Crown's duty to consult Indigenous representatives in good faith.

14. This additional stage would allow intervenors, including those representing DDBHH and Indigenous communities, to respond to new developments that directly affect their ability to participate.

Conclusion

15. DWCC respectfully supports the OLA's Procedural Request to:

- 1. Reopen CRTC 2025-94,**
- 2. Introduce a Final Comments stage,**
- 3. Extend cost-claim deadlines to 60 days,**

4. **Remove the role of respondent companies in challenging cost claims, and**
5. **Consider a premium or surcharge to reflect real financial risk borne by public interest intervenors.**

16. These changes would strengthen fairness, accessibility, and the integrity of the public participation process, particularly for the communities that the DWCC serves.

Respectfully submitted,

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

cc: Participating parties

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