



Deaf Wireless Canada Consultative Committee

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VIA EMAIL DISTRIBUTION and GC KEY

Sept 9, 2025

Mr. Marc Morin

Secretary-General

Canadian Radio-telecommunications and Telecommunications Commission (CRTC)

sec-gen@crtc.gc.ca

Reference: Public record: [1011-NOC2025-0094](#)

Dear Secretary General,

Re: [BTNC CRTC 2025-94](#): Call for comments – A new approach to funding public interest participation in Commission proceedings - Intervention

1. The Deaf Wireless Canada Consultative Committee - Comité pour les Services Sans fil des Sourds du Canada (DWCC - CSSSC or "DWCC"), hereby this intervention to participate in *Broadcasting and Telecom Notice of Consultation CRTC 2025-94, Call for comments – A new approach to funding public interest participation in Commission proceedings*.

Supplementary Investigative Report

2. Today, the DWCC supplements this first intervention with a detailed survey analysis report for Telecom Broadcasting Notice of Consultation 2025-94: *Ten Years Of Participation And Lessons For Funding Reform: Accessibility Costs And Equity In Public Interest Participation - A Decade Of Evidence*. The report provides an investigative analysis of ten years of participation in CRTC proceedings, with a focus on accessibility, equity, and the cost-award process. Drawing on documented filings, survey data, and community interviews, it highlights the barriers faced by small, equity-seeking organizations in sustaining meaningful participation, including lengthy reimbursement delays and the absence of dedicated funding mechanisms in Canada. The report concludes with recommendations for funding reform to ensure that lived-experience expertise from Deaf, DeafBlind, and Hard of Hearing Canadians can continue to inform telecommunications policy in the public interest.

About our Committee

3. The Deaf Wireless Canada Consultative Committee - Comité pour les Services Sans fil des Sourds du Canada (**DWCC** - CSSSC or "**DWCC**"), advocates for the full inclusion of diverse members within the Canadian Deaf, Deaf-Blind, and Hard of Hearing (DDBHH) community in Canadian society.
4. Building on nearly a decade of national accessibility advocacy, DWCC brings forward direct evidence and lived experience from Deaf, Deaf-Blind, and Hard-of-Hearing (DDBHH) communities to highlight longstanding barriers in the current cost awards regime. Our submission offers concrete, equity-based solutions to ensure permanent, inclusive, and community-led participation in CRTC processes by underfunded accessibility organizations.
5. The Committee advocates for the full inclusion of diverse members within the Canadian Deaf, Deaf-Blind, 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 that Indigenous users have the right to ask for support, including requesting Indigenous Sign Language interpreters. When **DWCC** writes DDBHH, it is inclusive of all those with intersectional identities.

Clarification Regarding Terminology

6. DWCC wishes to respectfully raise a concern regarding the use of the term "**DDIHHDB**" Deaf, Deaf Indigenous, Hard-of-Hearing, and DeafBlind (**DDIHHDB**) as it appears in CDGM submissions. DWCC has a strong concern as we want to ensure the Commission maintains its respectful wishes of DeafBlind/Deaf-Blind and Indigenous Deaf consultants who have worked with and advised the DWCC team on how they want to be represented at the government level.
7. DWCC uses the term **DDBHH** (Deaf, DeafBlind, and Hard of Hearing) with an **intersectional lens**, recognizing Indigenous individuals **within** that umbrella while always upholding Indigenous peoples' self-determination and cultural autonomy. This is consistent with the feedback of our Indigenous Deaf consultant, who has stated clearly that the term "Deaf Indigenous" is not acceptable. The consultant explained that it is for the reason "*Indigenous people are always Indigenous first before they are Deaf.*"
8. We strongly encourage the Commission and all participating groups to adopt respectful and inclusive terminology that reflects the lived realities and self-identification of the communities involved.

9. **DWCC's** mandate is to advocate for accessible wireless communications equity for DDBHH Canadians, including but not limited to:
- a. Cost-reasonable, 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.

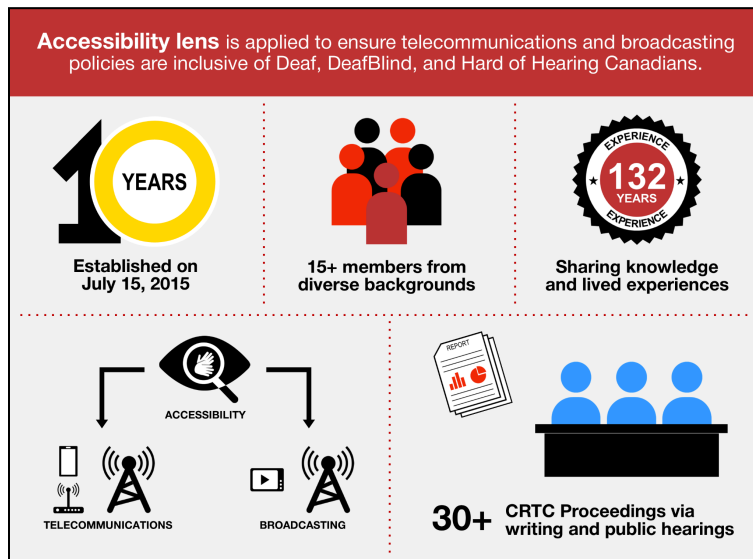
Proposed Amended Mandate 2025

- g. Increasing the quality and accessibility of closed captioning via traditional broadcasting and online streaming services
- h. Increasing accessible sign languages in telecommunications, streaming platforms, and broadcasting services
- i. 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

Background and DWCC's Experience in CRTC Participation

10. The **Deaf Wireless Canada Consultative Committee (DWCC-CSSSC)** is a Deaf-led national organization that ensures Deaf, DeafBlind, and Hard of Hearing (DDBHH) Canadians have an equitable voice in telecommunications and broadcasting policy. Through interventions in key proceedings—such as **TNC 2020-178** (wireless affordability), **TNC 2021-102** (cost inequities in RFI responses), **TNC 2021-191** (barriers in mobile wireless competition), and **TNC 2025-20** (future of broadcasting accessibility)—DWCC has brought forward perspectives grounded in lived experience. In broadcasting, DWCC contributed national survey evidence on captioning in **BNC 2024-137**, addressed affordability and access in **BNC 2024-288**, and advocated for stronger obligations in **BNC 2025-2**.
11. 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. 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. For this proceeding, the DWCC team collaborated to create infographics that communicate a summary of DWCC's decade of advocacy and consultative services



12. The purpose of this intervention is to present the perspectives of the Deaf, DeafBlind, and Hard of Hearing (DDBHH) community, drawing on a decade of active participation in more than 30 telecommunications and broadcasting proceedings. It also incorporates historical data from over 26 cost applications, together with insights from seven consultants who were interviewed about their experiences participating in public regulatory processes initiated by the Canadian Radio-television and Telecommunications Commission (CRTC).

Response to Commission Questions

One Funding System

The Commission recognizes that having to deal with two different organizations depending on the type of proceeding can be challenging for some individuals and public interest groups. Its preliminary view is that having a single application process for any Commission proceeding may be a better approach.

Q1. Should the application process for funding the participation of public interest groups be the same in both telecommunications and broadcasting proceedings?

13. Yes, DWCC believes that the application process for funding the participation of public interest should be similar between telecommunications and broadcasting proceedings. A united process would help ensure equitable access to public participation funding, particularly for under-resourced groups. It would also create greater consistency in regulatory frameworks, reducing unnecessary barriers and confusion. Simplifying and

standardizing the application process would make it easier for public interest organizations to engage meaningfully across both types of proceedings.

Q2. If so, should the Commission or an independent third party process the applications?

14. DWCC believes that the Commission itself should process all applications through a unified, accessible funding system. As the decision-making body, with statutory obligations under the *Accessible Canada Act* and the *2023 Policy Direction* to remove barriers and promote accessibility, the Commission is best positioned to ensure consistency, accountability, and equitable treatment across proceedings.
15. Establishing a single-window CRTC process would reduce confusion and administrative burden by eliminating the need to navigate multiple sets of rules and third-party mechanisms.

Q3. What are the barriers, if any, to using the same process in telecommunications and broadcasting proceedings. How can these be addressed?

16. Delegating responsibility to independent third parties has created barriers to using a consistent process across telecommunications and broadcasting proceedings. This delegation introduces systemic inconsistencies and a lack of accountability—particularly for accessibility organizations.
17. For example, the Broadcasting Participation Fund (BPF) does not cover the time required to prepare a cost application, whereas the CRTC's telecommunications cost awards process does. DWCC learned this through its application for the BNC 2024-137 proceeding. This inconsistency creates unequal access to funding and disincentivizes participation by equity-seeking groups, who may not have the financial flexibility to absorb unrecoverable costs.
18. Moreover, the BPF has not fully adopted an Accessibility Lens in its funding model. As a result, key accessibility-related costs are often underfunded, and accessibility organizations are rarely consulted in the design or reform of participation funding frameworks. DWCC was informed by the BPF that interim costs would no longer be permitted, effective as of September 2, 2025. This decision has led to policy blind spots—such as the absence of automatic support for accessibility-related costs or interim costs to attend hearings in person.
19. Furthermore, the BPF's decisions are constrained by funding availability, which can limit support even for eligible applicants. In contrast, the Commission's telecommunications cost awards process is subject to objections from other parties but not limited by a fixed funding pool.

20. To address these issues, the Commission should implement a unified and Commission-managed funding system for both telecommunications and broadcasting proceedings. This would improve consistency, reduce inequities, and ensure the application of accessibility standards across all public processes. As the regulator responsible for ensuring equitable access to public proceedings, the Commission is best positioned to unify and standardize the cost awards process to uphold accessibility and fairness.

Independent Third-Party Fund

If participation in Commission proceedings is funded through an independent third-party like the BPF, the Commission would need to identify a specific organization to administer the funds and decide how:

- **The organization is funded**
- **individuals and public interest groups could apply for funding; and**
- **funding would be made.**

Q4. If funding is managed by a single independent third-party fund, would the BPF be the right organization to administer funding?

21. DWCC is open to supporting the BPF as the unified funding body only if it fully adopts an Accessibility Lens in its funding structure and decision-making processes. This includes ensuring that public interest groups are consulted before new rules are established, and that barriers to participation are proactively identified and removed in alignment with the *Accessible Canada Act* and the CRTC's *2023 Policy Direction*. Additionally, it ensures that policies reflect lived experiences and diverse needs.
22. The BPF's recent decision to discontinue interim funding is harmful, as equity-seeking groups may lack the means to attend hearings in person without such support. For example, DWCC required interim funding to participate in the BNC 2024-288 proceeding after exhausting its available funds. Furthermore, the time required to prepare cost applications must be recoverable to ensure equitable participation.

Q5. If so, what changes would be required to broaden its mandate and funding processes?

23. If the BPF is to serve as a unified funding body for both telecommunications and broadcasting proceedings, it must undergo significant reforms to broaden its mandate and align with accessibility, equity, and public interest principles.
24. **DWCC** identifies the following critical changes:
- 1) **Formally integrate an Accessibility Lens across all aspects of its governance and funding**
 - a) Automatic funding for:

- i) Interpretation for:
 - (1) English ↔ ASL
 - (2) French ↔ LSQ
 - (3) ASL ↔ LSQ
 - (4) LSQ ↔ ASL
 - ii) Translation coordination
 - iii) Accessible formats
 - iv) DeafBlind accommodations
- b) Accessibility Lens must reflect intersectionality, ensuring that funding supports Deaf, DeafBlind, and Hard of Hearing communities equitably

2) Expand the funding criteria

- a) Time required to prepare cost applications and answer RFI's
- b) Travel, accommodation, local travel, and meal costs for hearing attendance
- c) Community outreach and engagement activities
- d) Data collection and policy analysis effort
- e) Monthly living accessibility retainer*

3) Inclusive governance reform

- a) Ensure funding decisions incorporate lived experience and diverse accessibility needs
- b) Decision-making processes must be informed by equity and accessibility obligations

4) Harmonize with CRTC's Accessibility and Equity Mandates

- a) The Accessible Canada Act
- b) CRTC's 2023 Policy Direction
- c) Canada's commitments under the UN Convention on the Rights of Persons with Disabilities (UN CRPD)

5) Ensure transparency, accountability, and co-design

- a) Develop clear, publicly available funding guidelines, with examples specific to accessibility-related participation
- b) Implement a co-design process with accessibility stakeholders to streamline the application process for diverse organizations

25. **DWCC** reserves the right to further expand on the concept of *the Monthly living accessibility retainer* in the Reply phase.

Q6. If a different organization would be more appropriate, how could the commission ensure that individuals and public interest groups continue to receive funding to participate in proceedings while this new organization is being established?

26. To ensure continuity and equitable participation during the transition to a new organization, DWCC recommends that the Commission extend the operational mandate of the BPF until the new funding organization is fully operational. This should include continuing to process and approve applications under current criteria and timelines, with added flexibility for accessibility-based submissions.

27. In parallel, the Commission should establish a temporary in-house mechanism to allocate interim funding for accessibility-related supports and procedural support for public interest groups with lived experience and subject-matter expertise. To prevent gaps in representation, the Commission should allow advance interim cost awards to eligible applicants upon filing participation notices or letters of intent.
28. This approach would enable small public interest groups to plan staffing and engagement with confidence—particularly in multilingual (English, ASL, French, and LSQ) and multi-format participation contexts.

Funding Availability

Q7. How can the Commission's eligibility criteria be streamlined or improved?

29. DWCC recommends the Commission to streamline and improve its eligibility criteria by adopting a system-wide Accessibility Lens, removing procedural barriers, and ensuring equity-based eligibility—particularly for small, under-resourced, and accessibility-focused organizations. These reforms would reduce gatekeeping, encourage broader participation, and uphold the *Accessible Canada Act's* mandate to eliminate systemic barriers.

30. DWCC **recommends** the following:

1) Adopt plain language and accessible eligibility guidelines

2) Broaden recognition of expertise in accessibility, digital inclusion, and equity issues

- a. Lived experience only
- b. Professional expertise only
- c. Both lived experience and professional expertise

3) Formally recognize participation by:

- d. Indigenous Deaf, DeafBlind, and Hard of Hearing individuals/communities
- e. Deaf, DeafBlind, and Hard of Hearing individuals/communities
- f. Volunteer-based organizations and groups
- g. Disability-led non-profits and accessibility think tanks
- h. Academic-community partnerships working on accessibility, language rights, or digital equity
- i. Remote, rural, and northern organizations or groups representing digital exclusion issues

4) Remove unnecessary administrative burdens, such as:

- j. Requiring detailed incorporation documents
- k. Demanding extensive justification of relevance for long-standing accessibility participants

5) Clarify cost eligibility for key activities, including:

- l. Preparation time for cost applications
- m. Interpretation/translation and accessibility coordination
- n. Community consultations
- o. Survey design in ASL/LSQ/plain language

31. DWCC stands ready to co-develop streamlined and inclusive eligibility criteria with the Commission and other equity-deserving groups.

Q8. How can the Commission make it easier for parties that have not historically participated in Commission proceedings to participate?

32. DWCC believes that to make it easier for individuals and groups who have not historically participated in Commission proceedings, the Commission should adopt a plain language approach in its notices, guidelines, and decisions. Legalistic or technical language can be a significant barrier to engagement, particularly for smaller, under-resourced, or equity-seeking organizations.

33. DWCC also supports the idea of holding an annual public feedback session where only individuals and organizations who have participated in CRTC proceedings during the previous year are invited to share their experiences. This would help strengthen institutional accountability, identify barriers to participation, and create a continuous improvement loop in the Commission's engagement practices. Importantly, this feedback mechanism should center the voices of those with lived experience navigating CRTC processes, rather than privileging large institutional parties.

34. The Commission should also strive to balance participation, ensuring no single group—whether industry, academia, or otherwise—dominates public engagement to the detriment of grassroots, lived-experience-based, and equity-deserving perspectives.

(a) Are there specific considerations pertaining to equity-deserving groups, Indigenous rights holders, OLMCs, or academics?

35. Yes, there are specific and urgent considerations that must be addressed to ensure meaningful and equitable participation from equity-deserving groups, including Deaf, DeafBlind, and Hard of Hearing communities who have been systematically excluded from regulatory processes.

36. These groups often face intersecting barriers that prevent or limit participation, such as:

- Lack of upfront funding for preparation and engagement
- Inaccessible processes, including the absence of ASL/LSQ interpretation, plain language materials, or screen-reader-friendly formats

- Administrative burdens in cost applications, particularly for under-resourced organizations
- Delays in cost reimbursement, which disproportionately harm small and grassroots groups

37. To address these barriers, the Commission must:

- Automatically cover all accessibility-related expenses, with reimbursement processed outside of lengthy approval cycles.
- Provide interim funding options to support participation before final cost awards are issued.
- Simplify all participation processes through plain language documents, multilingual support, and streamlined application forms.

38. Making equity real in Commission proceedings requires going beyond formal inclusion to address the material and structural barriers that keep equity-deserving groups on the margins. The Commission has both the authority and the responsibility, under the *Accessible Canada Act* and the *2023 Policy Direction*, to create accessible, inclusive, and barrier-free processes for public engagement.

Q9. Should individuals and public interest groups have to demonstrate that they meet the eligibility criteria every time they apply for funding? If not, at what intervals should they have to?

39. DWCC believes that while there is a reasonable basis for requiring public interest participants to demonstrate eligibility for each proceeding, doing so in every case can create unnecessary administrative burdens.

40. Many public interest groups operate with limited resources, and repeatedly verifying eligibility can discourage participation—particularly among smaller or equity-seeking organizations. The Commission should therefore allow eligibility to be “carried over” when:

- a) The organization or group has recently participated in a CRTC proceeding; and
- b) The current proceeding is on the same or a closely related topic.

41. For example, DWCC participated in the proceedings that established Video Relay Services (VRS). Based on that participation, DWCC should not be required to re-establish its eligibility in future proceedings related to the operation or funding of VRS.

42. At the same time, there should still be a simple mechanism to confirm alignment with the proceeding. Eligibility waivers should be conditional on a brief summary that outlines:

- The organization’s or group’s mandate, and
- How is its participation relevant to the proceeding?

43. An **exception principle** should apply in cases where an organization has been absent from Commission proceedings for an extended period of time, or where its membership, structure, or mandate has significantly changed. In such situations, it is reasonable for the Commission to require a renewed demonstration of eligibility and justification for consultant rates, ensuring accountability and consistency.
44. For example, the Ontario Video Relay Service Committee (OVRSC) had not participated in Commission proceedings for seven years, during which its consultant rate increased from 110 to 225. Without an ongoing record of participation or accountability, it is appropriate that the Commission require additional evidence before granting eligibility. This approach balances fairness—protecting against unjustified claims—while still supporting continuous participants such as DWCC, whose eligibility in related proceedings (e.g., Video Relay Services) should be carried forward without duplication of effort.
45. This approach balances procedural integrity with the need to reduce barriers for public interest groups.
46. An infographic, as referenced below, could help standardize this step and make the process more accessible.



Q10. Should funding be available for informal Commission activities that take place before or outside of formal Commission proceedings (for example, the CRTC Interconnection Steering Committee meetings, informal consultations, and roundtable meetings)? If so, which activities should be eligible for funding?

47. DWCC strongly believes that funding for informal CRTC activities should be made available, including for any accessibility-related conferences or events to ensure equitable participation and promote inclusive innovation in the telecommunications and broadcasting sectors.
48. These conferences play a critical role in advancing knowledge, best practices, and emerging technologies that directly impact the lives of DDBHH Canadians. By providing financial support for attendance, especially for DDBHH individuals, barriers such as travel costs, registration fees, and accommodation challenges can be reduced or eliminated.
49. Furthermore, accessibility-focused events foster cross-sector collaboration, spark policy development, and elevate the voices of DDBHH communities. Public funding in this area not only supports professional development and knowledge exchange but also reflects a tangible commitment to creating a more accessible and inclusive Canadian society for all.
50. Funding accessibility-related conferences directly benefits the CRTC by enhancing its regulatory effectiveness, informing policy development, and reinforcing its leadership role in promoting accessibility within Canada's broadcasting and telecommunications systems. These conferences serve as vital forums for engaging with DDBHH, accessibility experts, and industry stakeholders, offering the CRTC firsthand insight into emerging accessibility challenges, innovations, and user experiences.
51. By supporting and attending these events, the CRTC can stay ahead of technological trends, understand evolving community needs, and gather feedback to improve its accessibility policies and compliance frameworks. Furthermore, active participation demonstrates the CRTC's commitment to its mandate under the Accessible Canada Act, fostering public trust and showing leadership in building inclusive communications systems for all Canadians.

Examples:

- 1) World Federation of the Deaf (WFD) [World Congress](#)
- 2) [Canadian Telecom Summit](#) in Toronto, Ontario
- 3) [TDI for Access \(TDI\)](#) in Washington, D.C.
- 4) [WawaAbility](#) Conference
- 5) CRTC CISC Emergency Services Working Group (ESWG)
- 6) National Emergency Number Association Conference ([NENA Conference](#))
- 7) Local [NENA Ontario](#)
- 8) [ALL IN 2025](#) – Canada's Artificial Intelligence Event - Artificial intelligence (AI)
- 9) [M-Enabling Conference](#)
- 10) [Disability: In Conference](#)
- 11) [Accessibility Professionals Network Conference](#) (Rick Hansen Foundation)
- 12) Deaf, DeafBlind, and Hard of Hearing Expositions - e.g. [Ottawa Deaf Expo](#)
- 13) Other workshops and conferences

52. The Commission should encourage telecommunications companies to invest in a national telecommunications accessibility conference, led and organized by Deaf, DeafBlind, and Hard of Hearing (DDBHH) organizations. Such a forum would provide space for community-led dialogue on a wide range of accessibility topics, ensuring that solutions are shaped by those with lived experience rather than imposed from the outside.
53. At present, too many decisions are being made in settings designed and directed by others, such as the Canadian Telecommunications Association (CTA), where accessibility concerns are often considered after the fact rather than built into the design. A community-led conference would allow DDBHH organizations to set the agenda, identify emerging accessibility priorities, and propose solutions that reflect the realities of end-users across Canada. This approach would not only strengthen accessibility outcomes but also demonstrate genuine partnership between industry and equity-seeking groups.

Two Case Examples Demonstrating Systemic Exclusion

54. These examples highlight how industry and regulatory practices continue to marginalize Deaf, DeafBlind, and Hard of Hearing (DDBHH) Canadians by excluding their participation in key events and decision-making spaces.

1) Canadian Telecom Summit – Industry Gatekeeping of Accessibility Content

55. Despite DWCC's repeated efforts to propose accessibility-focused sessions—particularly on emerging communication technologies impacting the Deaf, DeafBlind, and Hard of Hearing (DDBHH) community—the **Canadian Telecommunications Association (CTA)** and its member companies have **consistently rejected these proposals** for inclusion in the **Canadian Telecom Summit**. While the event organizer, **McGregor Communications**, has expressed openness to such ideas, they are ultimately **constrained by the CTA's financial influence**, as **CTA members fund the Accessibility admission costs**.
56. As a result, **industry sponsors effectively gatekeep accessibility content**, blocking opportunities for DDBHH-led presentations on critical topics such as RTT, 5G+, AI-driven communications, and accessible emergency services. This exclusion **limits industry learning, reinforces structural audism, and marginalizes Deaf-led expertise** at a time when inclusive innovation is more necessary than ever.
57. Just this week, the **CRTC CISC ESWG TIF89/93** cancelled its scheduled monthly meeting to prioritize attendance at the **NENA Ontario Conference**—a major event in emergency communications planning. However, **no notice was provided to DWCC or its Chair**, despite DWCC's long-standing contributions to the 9-1-1 accessibility policy and its direct impact on the DDBHH community.

58. This lack of communication demonstrates how **accessibility organizations are sidelined**, even in areas where their participation is essential. It further underscores the **systemic audism** embedded in both **industry and regulatory practices**. These repeated patterns of exclusion deny DDBHH Canadians the right to fully participate in shaping the future of telecommunications and emergency services.

59. DWCC strongly believes that reimbursement rates must not only be increased, but also equalized to ensure that subject matter experts and spokespersons are compensated on par with lawyers. Favouring legal professionals over individuals with lived experience or specialized knowledge undermines equity and fairness in participation. The current cost eligibility framework should be expanded, modernized, and adjusted for inflation—especially to reflect the real and rising costs incurred by accessibility organizations, sign language users, and under-resourced public interest groups.

60. DWCC further recommends that eligibility for the next tier of reimbursement rates be based on hours of relevant CRTC experience, rather than years, to ensure a fairer and more accurate reflection of CRTC expertise. This approach ensures a fairer and more accurate assessment of a participant's CRTC-related expertise. Three distinct tracks for determining reimbursement rates are proposed as follows:

- Lived experience only
- Professional expertise only
- Both lived experience and professional expertise

61. The following table illustrates a proposed tiered rate structure based on hours of relevant experience within each track:

| Hours of CRTC Experience | Lived Experience Only | Professional Expertise Only | Both, Lived and Professional |
|--------------------------|-----------------------|-----------------------------|------------------------------|
| 2,500+ | \$350.00 | \$400.00 | \$500.00 |
| 2,000+ | \$300.00 | \$350.00 | \$450.00 |
| 1,500+ | \$250.00 | \$300.00 | \$400.00 |
| 1,000+ | \$200.00 | \$250.00 | \$350.00 |
| 500+ | \$150.00 | \$200.00 | \$300.00 |

62. Additionally, DWCC recommends that credentialed professionals—those holding degrees such as a B.A., M.A., J.D., Ph.D. or accessibility certifications—be eligible to start at a higher reimbursement tier, reflecting their advanced expertise and educational background. For example, a participant with an M.A. could start at two tiers higher than someone with only lived experience, recognizing the significant contribution their formal training brings to informed and effective participation.

63. This equalized, tiered rate system supports greater equity and inclusion by fairly compensating all contributors for their expertise and lived experience, ultimately strengthening the quality and diversity of participation in CRTC proceedings.

Q12. Should the Commission use a different way to determine how much a party should receive? If so, explain how and why.

64. DWCC recommends that the Commission adopt a different, more equitable method for determining funding amounts by implementing a tiered reimbursement system based on relevant expertise and lived experience, rather than defaulting to traditional categories that disproportionately favour legal professionals.

65. Specifically, DWCC proposes a three-track system that considers:

- a. Lived experience only
- b. Professional expertise only
- c. Both lived experience and professional expertise

66. Eligibility for tiers should be based on hours of relevant CRTC experience, rather than simply years or job title, to more fairly and accurately reflect a participant's engagement and knowledge of CRTC proceedings.

67. Furthermore, credentialed professionals holding advanced degrees or accessibility certifications should be eligible to start at higher reimbursement tiers, recognizing the value of their formal training alongside lived experience.

68. This approach replaces the existing method, which tends to prioritize legal expertise, with a more inclusive and nuanced system that values diverse types of contributions.

69. DWCC believes this shift is necessary because the current funding model:

- a. Creates inequities by undervaluing lived experience and accessibility expertise
- b. Discourages meaningful participation by under-resourced and equity-seeking groups
- c. Fails to reflect the true costs and complexity of participation from accessibility organizations and sign language users

70. By adopting this tiered, experience-based model, the Commission would:

- a. Promote fairness and equity in compensation
- b. Encourage broader and more diverse participation
- c. Improve the quality and relevance of contributions to its proceedings
- d. Align more closely with accessibility and equity mandates under the *Accessible Canada Act* and the CRTC's policy directions

71. In sum, DWCC urges the Commission to modernize its funding determination process to reflect the real-world expertise and lived experience necessary for inclusive, effective regulatory participation.

Q13. If the current costs model is maintained, how could the process be simplified?

72. If the Commission retains the current costs model, the focus must shift to simplifying the process by eliminating administrative burdens and enhancing accessibility while maintaining fairness and preventing procedural abuse. DWCC recommends:

1) Accessibility Enhancements

- a. Provide plain-language instructions alongside ASL/LSQ video guides to ensure DDBHH participants are not excluded by dense legal text.
- b. Include a dedicated section for accessibility-related costs—such as ASL/LSQ interpretation, captioning, accessible formatting, and DeafBlind supports—to ensure they are recognized explicitly, not hidden under “Other”.

2) Administrative Streamlining

- a. Introduce standardized templates for invoices, timesheets, and disbursements, plus a clear checklist of allowable expenses, for consistency and ease of use.
- b. Enable pre-approval of accessibility costs, allowing organizations to participate with financial certainty rather than uncertainty.

3) Timely Funding and Financial Stability

- a. Adopt a 60-day service standard from application to reimbursement for cost applications, protecting small public-interest groups from financial limbo.
- b. Require plain-language explanations for any reductions in requested costs, maintaining transparency and comprehension.

4) Fairness and Procedural Integrity

- a. Implement a simple and accessible appeal process in lieu of complex review procedures.
- b. Include safeguards to prevent procedural abuse—ensuring public interest groups are not overwhelmed or financially exhausted by repetitive or predatory tactics.

74. Together, these changes would make the cost awards process more accessible, efficient, and equitable—ensuring meaningful participation from all Canadians, especially those in underrepresented communities.

Q14. If funding is collected through a third-party fund like the BPF:

a) Who should be required to contribute to the fund?

75. DWCC believes that all telecommunications service providers and broadcasting distribution undertakings (BDUs) regulated by the CRTC should contribute to the participation fund. This obligation should also extend to online undertakings captured under the *Broadcasting Act* and *Online News Act*, reflecting the evolving media landscape.
76. Additionally, federal and provincial governments should be invited to contribute, given the public-interest nature of accessibility participation. Public-interest involvement strengthens the integrity, transparency, and legitimacy of the regulatory system—ultimately benefiting consumers, regulators, and industry alike. Therefore, its costs should not fall solely on consumers and accessibility organizations that already face significant resource constraints. A shared funding model would promote fairness, sustainability, and inclusive participation in all CRTC processes.

b) How should the Commission calculate who pays and how much they should pay?

77. DWCC recommends that if funding is collected through a third-party fund like the BPF, contributions should be calculated based on two key elements: (1) market share, and (2) volume of participation in the proceeding.
78. All interested parties, including telecommunications service providers, broadcasting distribution undertakings (BDUs), online undertakings regulated under the *Broadcasting Act* and *Online News Act*, as well as federal and provincial governments, should contribute to the fund.
79. Market share ensures that larger entities contribute proportionally based on their size, revenue, and influence in the communications ecosystem, promoting fairness and sustainability.
80. Volume of participation addresses behaviour during proceedings. For example, if a company like Bell repeatedly files requests for clarification or justification of claims made by a participant, Bell's contribution share for that proceeding should increase in proportion to its persistent questioning. The first such request would not count toward this calculation, recognizing every party's right to raise legitimate queries. This mechanism is intended to prevent tactics aimed at exhausting, demoralizing, or bullying participants by dragging out proceedings unnecessarily.
81. By combining these elements, the Commission can create a balanced and equitable funding model that discourages procedural abuse while ensuring all stakeholders contribute fairly to support meaningful and inclusive public-interest participation.

Q15. If the companies that are required to pay the costs awarded to public interest groups are identified on a proceeding-by-proceeding basis:

a) Who should be responsible for paying the costs in each proceeding?

b) Could the Commission's current process be simplified (for example, by increasing the minimum contribution any one company must pay; establishing at the outset which companies should pay and the amounts they could be expected to pay)? If so, on what basis should those amounts be calculated?

82. DWCC notes that Question 15 is substantively identical to Question 14. To avoid repetition, it refers the Commission to Q14 for a full response, which outlines a detailed position and recommendations.

Modernizing Cost Awards

Q16. In general, what can the Commission do to issue funding decisions more quickly?

83. DWCC urges the Commission to establish a predictable and reasonable timeframe for issuing cost award decisions. In one case, DWCC waited 18 months from the date of its initial cost application to the issuance of a cost order for the regulations to be made under the *Accessible Canada Act*. This significant delay is excessive and unacceptable for public interest organizations that depend on timely disbursement to support their ongoing participation.

84. In contrast, DWCC's three shortest wait times—all from the Broadcasting Participation Fund (BPF)—ranged from one to two months. These examples demonstrate that significantly shorter timelines are achievable and necessary. See the two tables below for a comparison of DWCC's four longest and four shortest wait times.

| Longest wait for cost awards | | Shortest wait for cost awards | |
|------------------------------|-------------|-------------------------------|------------|
| BTNC 2020-81 | 18.0 months | BNC 2025-48 | 1.0 month |
| TNC 2021-102 | 17.5 months | BNC 2024-288 | 1.5 months |
| TNC 2022-65 | 15.5 months | BNC 2024-137 | 2.0 months |
| TNC 2016-116 | 11.5 months | TNC 2025-20 | 3.5 months |

86. Since December 9, 2023, the *Federal Prompt Payment for Construction Work Act* has been in force, requiring the federal government to pay contractors within 28 days of receiving a proper invoice. This legislation was enacted to eliminate systemic delays in federal contracting, recognizing that such delays cause real harm to small and medium-sized organizations, workers, and subcontractors.

87. DWCC urges the Commission to apply a similar standard to cost award decisions. Given that the BPF has consistently issued cost awards within one to two months, the Commission should consider implementing a maximum timeline of 60 days for issuing cost orders. Doing so would support timely participation by public interest groups and uphold principles of fairness and accessibility.

Q17. How can the Commission simplify applications for interim costs so that applicants can obtain funding earlier in a proceeding?

88. DWCC recommends that the Commission simplify applications for interim costs by introducing a streamlined, one-page budget application form, accompanied by a two-week, forthwith review window. This approach would allow applicants to receive an initial decision on interim costs promptly and enable the Commission to coordinate with cost-supporting mechanisms to ensure parallel review processes and prompt advance disbursements.
89. This approach would mitigate upfront financial barriers to participation for equity-seeking and accessibility organizations. It aligns with the *Accessible Canada Act* mandate to proactively remove systemic barriers—including financial ones—in regulatory processes. It also supports the Commission's *2023 Policy Direction*, which emphasizes the removal of participation barriers. Delays in cost decisions often mean the difference between participating in or being excluded from critical public interest proceedings.

Q18. Should the Commission require that individuals and public interest groups provide an attestation that they and anyone who worked with them during the proceeding have not engaged in hate speech?

90. DWCC strongly supports the principle that hate speech has no place in regulatory proceedings. However, DWCC does not support requiring an attestation to this effect, as such a requirement would be largely symbolic and potentially harmful. It could be weaponized against marginalized individuals and communities, or lead to exclusion through accusation rather than evidence.
91. Those who engage in hate speech are unlikely to acknowledge it as such and may frame their statements as expressions of opinion or free speech. In practice, they may still be able to obtain legal support and support attestations, rendering the requirement ineffective. Instead of relying on attestations, the Commission should focus on enforcing clear, evidence-based standards of conduct within proceedings.

Q19. What other mechanisms can the Commission put in place to ensure that public interest funding does not support hate speech?

92. DWCC recommends that the Commission adopt a targeted, transparent, and procedurally fair framework grounded in three pillars: clear definitions, remedy-based enforcement, and collaborative accountability.

Indigenous and Official Language Minority Communities

20. Should the Commission establish different processes to fund the participation of Indigenous groups, such as Indigenous organizations and governments, in Commission proceedings? If so, what should those processes be?

93. DWCC acknowledges that, as a non-Indigenous organization, they are not in a position to define specific funding processes on behalf of Indigenous Peoples. However, DWCC affirm that the Commission must recognize Indigenous governments and organizations as distinct rights-holders and ensure that they are supported through dedicated and culturally appropriate participation funding mechanisms.
94. DWCC urges the Commission to consult directly with Indigenous governments and organizations on how such funding streams should be structured, consistent with Canada's commitments under *UNDRIP* and the *Accessible Canada Act*.

Q21. Should the Commission establish different processes for funding for OLMCs? If so, what should those processes be?

95. Yes, users of American Sign Language (ASL), Langue des signes québécoise (LSQ), and other recognized sign languages, must be recognized as part of Canada's linguistic minorities. The Commission should establish funding processes that ensure these communities can participate fully and equitably in proceedings.
96. DWCC aligns with the view that these measures should be integrated into the Commission's standard procedures, rather than treated as separate or "exceptional" processes. True equality requires that every proceeding be accessible by default with sign language interpretation, captioning, and translation resources funded and consistently available.
97. To ensure equitable participation of Deaf, DeafBlind, and Hard of Hearing individuals, DWCC recommends the following:
- 1) Automatic accessibility supports - funding for interpretation, captioning, and translation without requiring additional applications;
 - 2) Dedicated funding for language equity - protected enveloped with participation funding to ensure it is not diluted by competition with larger, better-resourced organizations
 - 3) Embed accessibility supports - integrated into the Commission's processes as the norm rather than optional or ad hoc accommodations;

- 4) Alignment with legal obligations - guided by the *Accessible Canada Act* and the *2023 Policy Direction (sections 2d and 17c)*

98. For participation in a proceeding, all interpretation and translation services between English and ASL, ASL and English, French and LSQ, LSQ and French, as well as between ASL and LSQ, should be directly covered by the Commission. As these are essential accessibility supports, their costs must be considered fully recoverable.

99. Additionally, any vendors contracted during the proceeding to provide these services must be paid promptly upon completion of their work, to ensure timely compensation and maintain accessible participation throughout the process. Reimbursement for these services must be automatic, without requiring lengthy approval processes.

Online News Act

Q22. Should the Commission establish processes to fund participation in proceedings under the Online News Act? If so, what should those processes be?

100. DWCC's expertise is rooted in telecommunications and broadcasting accessibility, and do not yet have direct experience with proceedings under the Online News Act. All new media and content that falls under the Commission's mandate should be included in the costs claim application process. However, there are accessibility considerations that should be universal across all regulatory processes:

- 1) **Cost Awards Coverage** - accessibility groups should be eligible to claim costs in Online News Act proceedings on the same terms as in broadcasting and telecommunications
- 2) **Accessibility Standards Apply Equally** - ASL/LSQ interpretation, captioning, plain language, and accessible formatting must be mandated as they are for regulated broadcasting
- 3) **Barrier-Free Participation** - Without integration of accessibility obligations and funding into Online News Act proceedings, DDBHH communities risk exclusion from shaping how news content is distributed online

Participation in the proceedings

101. DWCC is filing this Intervention on its own. The submission responds to the Commission's 22 consultation questions, supplemented by an investigative historical analysis of DWCC's participation over the past decade, *Ten Years Of Participation And Lessons For Funding Reform: Accessibility Costs And Equity In Public Interest Participation - A Decade Of Evidence*. Including quantitative historical data from past cost applications, as well as responses from six consultant interviews. These findings are further detailed in the attached **Investigative Research Report**, which provides additional evidence for the Commission's consideration. Please note that the Report has

been filed without a Table of Contents and with certain letter documentation missing from Appendix C, with the intention to re-file a complete version after the submission deadline.

102. We respectfully submit this contribution to **Broadcasting and Telecom Notice of Consultation CRTC 2025-94: A new approach to funding public interest participation in Commission proceedings**. DWCC looks forward to participating in the reply phase and providing further input as required.

103. DWCC trusts that the evidence accumulated through its accessibility expertise and lived-experience research significantly and meaningfully contributes to this critical proceeding. We appreciate the Commission's consideration of our Intervention and the supporting Report. Should you have any questions, please do not hesitate to contact us.

Sincerely,

Jeffrey Beatty

Jeffrey Beatty, Chair
Deaf Wireless Canada Consultative Committee -
Comité pour les Services-Services Sans fil des Sourds du Canada (DWCC-CSSSC)

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