



**Deaf Wireless Canada Consultative Committee, Canadian National Society of Deaf-Blind,
Deaf-Blind Planning Committee**

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VIA EMAIL DISTRIBUTION and GC KEY

November 17, 2025

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Secretary-General

Canadian Radio-telecommunications and Telecommunications Commission (CRTC)

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Reference: Public record: [1011-NOC2025-0094](https://public.gc.ca/record/1011-NOC2025-0094)

Subject: [BTNC 2025-94-1](#) Call for comments - A new approach for funding public-interest participation in Commission proceedings - **REPLY Comments**

Reply Comments

1. On October 10, 2025, the Commission accepted the request by the Deaf Wireless Canada Consultative Committee – Comité pour les Services Sans fil des Sourds du Canada (DWCC-CSSSC, or 'DWCC') to include the Canadian National Society of the Deaf-Blind (CNSDB) and the Deaf-Blind Planning Committee (DBPC) in the Reply phase of this proceeding. The Commission determined that granting an extension would strengthen the public record and serve the public-interest.
2. The deadlines were revised to 9 November 2025 for the filing of replies. The Commission then further extended the deadline to 17 November 2025, after the DHH Coalition submitted a procedural request asking that the extension apply to all parties. **Henceforth, the DWCC, in joint submission with the CNSDB and DBPC, will participate as "DWCC et al".**
3. DWCC et al. respectfully submits this final reply in response to Broadcasting and Telecom Notice of Consultation CRTC 2025-94. This submission presents DWCC et al.'s positions, observations, and recommendations concerning the review of the Commission's costs-awards process as well as the broader framework for the funding of public-interest and accessibility participation in telecommunications and broadcasting proceedings. Before it begins to address the reply to interventions, DWCC et al. would like to introduce the CNSDB and DBPC, with brief descriptions of their respective mandates.

4. The CNSDB was registered in 1985 as a national consumer-run advocacy association dedicated to helping Canadians who are Deaf-Blind achieve a higher quality of life. They advocate for new and improved services for people who are Deaf-Blind, promote public awareness of Deaf-Blind issues and gather and distribute information that will help people who are Deaf-Blind to become full members of society.
5. The DBPC was created in 2012 to develop activities and programs for the community of Deaf-Blind adults and youth whose social, communication and support service needs were not being met by other agencies or programs in the Greater Vancouver area of British Columbia. The DBPC members are Deaf-Blind, Deaf, and hearing persons, all of whom have connections to the Deaf-Blind community as allies, consumers, family, or interpreters/intervenors.

Context of Participation and Terminology Clarifications

6. As referenced in paragraphs 5 through 8 of DWCC's Intervention for BTNC 2025-94, the proceedings initially unfolded with DWCC as the primary advocate for the Deaf-Blind community's concerns. At that stage, organizations such as the DBPC and the CNSDB had not yet joined the process. Their participation came later, in the Reply phase, bringing additional regional perspectives and expertise to the consultation. This timeline highlights the evolving coalition within the intervention, gradually building a stronger, more representative voice for Deaf-Blind Canadians in telecommunications policy.
7. The DWCC advocates for the full inclusion of diverse members within the Canadian **Deaf, Deaf-Blind, and Hard of Hearing (DDBHH)** community in Canadian society. There is a broad spectrum of DDBHH life experiences, including those who are Indigenous, 2SLGBTQIA+, or persons with neurodiversities or additional disabilities. Also part of the DDBHH community are immigrants learning English or French as a second language, individuals with varying degrees of hearing loss, those with the unique "double" disability as Deaf-Blind, and culturally rooted ASL/LSQ users. Furthermore, DWCC upholds the principle that Indigenous DDBHH have the right to request distinctive support, including Indigenous Sign Language interpreters. When DWCC uses the term *DDBHH*, it encompasses all individuals with intersectional identities.
8. DDBHH is intentionally written in this order, based on guidance from the 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*.

9. Spelling and terminology preferences also vary regionally across Canada. In British Columbia, organizations such as the DBPC and the Deaf, Deaf-Blind and Hard of Hearing Well-Being Program use the hyphenated form “Deaf-Blind,” as does the national CNSDB.
10. In contrast, some regions in BC, Alberta, and elsewhere prefer the single-word form “DeafBlind.” Both terms reflect the same lived experience; these variations simply express evolving language, regional identities, and organizational histories.

DWCC et al.’s Participation in the Funding Framework

11. DWCC et al. appreciate the Commission’s initiative to modernize and strengthen its participation funding framework, so that equally open opportunities are provided to support under-resourced, equity-seeking, and disability-led organizations to make valuable contributions to the public record.
12. As an accessibility-driven intervenor with ten consecutive years of participation, DWCC et al. submits that accessible and sustainable funding forms the basis for preserving the quality, diversity, and integrity of evidence presented before the Commission.
13. This proceeding is an opportunity to address systemic imbalances that have persisted in the current model. The review by the Commission can ensure that organizations representing DDBHH Canadians are not disadvantaged due to procedural complexity or uncertainty regarding timelines and insufficiency in accounting for accessibility-related expenses.
14. A modern, more transparent funding framework, designed with accessibility, equity, and accountability principles in mind, will enable the continued participation of diverse perspectives, which are essential to effective regulatory decision-making.
15. Without the DWCC, the DBPC and CNSDB, there would have been no Deaf-Blind input in this Reply document, and henceforth collectively replies as DWCC et al.
16. DBPC and CNSDB appreciate the inclusion in the Reply phase and thank the Commission for allowing them to participate and giving the Deaf-Blind consultant time to read through selected documents guided by the DWCC to contribute.
17. Accordingly, DWCC et al. hereby submits the following Reply Comments to address issues raised in the interventions of other parties, clarify its positions, and advance practical, evidence-based recommendations toward the creation of a fair, unified, and accessibility-centred participation funding system.
18. In preparing this Reply, DWCC et al. has considered the interventions to the record filed by various parties, with particular attention to those filed by Bell Canada and other

telecommunications service providers. A number of these interventions express concerns or include characterizations that, in the view of DWCC et al., have the potential to mislead the purpose of this proceeding and unduly devalue the contribution made by accessibility and public-interest organizations, whose participation is both legitimate and necessary.

19. Accordingly, the following section responds directly to Bell Canada's intervention, addressing its misrepresentations about DWCC et al.'s applications for an award of costs, elucidating the rationale and transparency of its participation practices, and reaffirming the critical role that accessibility organizations play in ensuring equitable and informed regulatory outcomes for all Canadians.
20. DWCC et al.'s response is structured in thematic sections, beginning with a response to Bell Canada's intervention, followed by the analyses related to funding system models, cost structures, processing timelines, accessibility-related expenses, and systemic barriers to participation. At the end of each section, practical recommendations are provided to guide the Commission in establishing a unified, accessible, and equitable framework for participation funding.

Executive Summary

ES1: This reply, prepared for the CRTC and the public record in [Telecom Notice of Consultation CRTC 2025-94](#), expresses DWCC et al.'s support for implementing a single funding system for participation in both telecommunications and broadcasting proceedings.

ES2: DWCC et al. bring essential, lived, and community-rooted expertise on accessibility issues affecting DDBHH Canadians. Since 2015, DWCC has consistently acted in good faith across numerous proceedings, with its "Ten Years of Participation and Lessons for Funding Reform" documenting its key achievements.

ES3: On October 25, 2025, DWCC was honoured with the prestigious 2025 Henry Vlug award by the Canadian Association of the Deaf – Association des Sourds du Canada (CAD-ASC). This recognition underscores DWCC's role as a trusted, ethical, and community-driven accessibility leader in Canadian telecommunications and broadcasting.

ES4: Bell Canada's portrayal of DWCC et al.'s cost applications as "excessive" is misleading, selective, and ignores both the systemic challenges faced by both accessibility organizations and the valuable contributions DWCC et al. have made to CRTC proceedings. Its characterization of DWCC et al. as abusing the cost award system is **creating a chilling effect on public-interest participation**.

ES5: Deaf-Blind individuals and organizations were excluded from the original Video Relay Services (VRS) policy development in TNC 2013-155. As a result, considerable time and resources were required in the review proceeding to assess it and make VRS more accessible to Deaf-Blind users whose distinct communication needs had not been adequately considered at the outset.

ES6: Bell Canada's roots in Alexander Graham Bell's legacy reflect a history of suppressing sign languages and Deaf culture, dating back to the 1880 Milan Congress. Its current opposition to equitable cost recovery for accessibility participants mirrors this historical exclusion. In contrast, DWCC et al. participate transparently, drawing on lived experience to ensure equitable access for all DDBHH Canadians.

ES7: The budget disparity between Canada's largest broadcasting and telecommunications companies and public-interest groups is stark, leaving smaller participants at a severe resource disadvantage, an actual David-versus-Goliath scenario that functions as a modern regulatory gatekeeper to cost recovery.

ES8: DWCC et al. submit that a single funding framework would ensure consistent cost allocation, thereby improving fairness and transparency across all participants. Furthermore, it would reduce unnecessary administrative burdens on public-interest participants.

ES9: DWCC et al. firmly oppose the use of the telecommunications costs award system as the basis for a single funding framework. Under the current system, costs applications face aggressive scrutiny and legitimate administrative work is often contested, creating significant barriers for public-interest participants.

ES10: DWCC et al. believe an efficient, adaptable, and approachable funding body would help remove barriers for equity-seeking and public-interest participants, enabling them to participate fully and meaningfully in Commission proceedings. This requires the use of an independent third-party administrator, with a model similar to the Broadcasting Participation Fund to reduce administrative burdens and create an accessible, streamlined process for equity-seeking participants.

ES11: The average annual cost awards for broadcasting proceedings were \$391,795 and \$454,468 for telecommunications proceedings, amounting to roughly one cent per wireless subscriber to fund public-interest participation.

ES12: DDBHH Canadians have been historically excluded from policy decision-making, contributing to the systemic barriers they now face in the telecommunications sector. The *Accessible Canada Act* requires the proactive identification, removal, and prevention of such barriers. Bell Canada's current approach perpetuates this cycle, continuing to deny DDBHH Canadians communication equity.

ES13: Public-interest funding must be accessible to support participation, predictable so funding can be expected in a timely manner, and adequate to reimburse costs at appropriate rates fully.

ES14: A monthly living accessibility retainer would provide a modest, predictable support for accessibility experts and consultants for the duration of regulatory proceedings. It would cover basic living expenses, enable continuous engagement throughout lengthy processes and reduce financial strain and burnout.

ES15: Current consultant and analyst rates are outdated and no longer reflect today's economic realities. A comprehensive rate adjustment process, including per diem rates, is required to address the prolonged rate stagnation.

ES16: Clear and transparent timelines for cost awards are essential. DWCC et al. assert that timely disbursement is critical to maintaining an accessible and inclusive regulatory process. Interim costs should be issued within 15 days, and final cost awards should be issued within 60 days, to ensure that funding is accessible, predictable, and adequate.

ES17: Accessibility expenses are essential for equitable access to participation and must be automatically covered at the outset of the process without delay or extensive justification. They should be treated as fully recoverable costs and not subjected to arbitrary caps.

ES18: A dedicated section for accessibility-related expenses should be included in cost applications to improve clarity, streamline the review process, and ensure such costs are correctly identified and prioritized. This would promote consistency and reinforce their legitimacy as necessary expenditures.

ES19: Cost challenges from telecommunications companies resemble a court-like process, creating a stressful and intimidating environment for public-interest participants, particularly those with limited resources. They also impose financial risk and have a chilling effect on participation.

ES20: Submitting meaningful interventions often requires significant upfront costs. Advance funding is crucial to mitigate financial risks. DWCC et al. incurred accessibility-related costs in advance, which were not reimbursed until several months after the proceeding concluded.

ES21: The CRTC's 30-day intervention period and overlapping deadlines create significant barriers for equity-seeking and accessibility-focused participants. Preparatory work before the Notice of Consultation leaves public-interest participants uncompensated. Meaningful participation requires additional time and timely support for accessibility coordination.

ES22: Dismissing administrative labour as non-compensable ignores the real work required for regulatory participation. Well-resourced companies can absorb these costs, but smaller public-interest participants cannot. Denying compensation creates structural barriers for underrepresented voices, particularly for DDBHH communities.

ES23: Repeated follow-ups and time spent tracking payments from telecommunications companies divert limited resources away from substantive policy engagement, disproportionately affecting smaller public-interest participants.

ES24: Funding restrictions create a chilling effect on public-interest participants, risking underfunding or overfunding participation due to the unpredictable nature of proceedings. They also hinder the ability to retain senior consultants or analysts needed to represent the interests of DDBHH communities effectively.

ES25: Requiring a formal request to intervene and submit a detailed budget at the outset creates procedural barriers for equity-seeking participants with limited resources. This risks marginalizing DDBHH communities, as the full scope of a proceeding is often not known at the outset.

ES26: DWCC et al. note that there is no guaranteed pool of DDBHH individuals available to fulfil junior roles. Mandating reliance on such individuals could unintentionally exclude or disadvantage DDBHH participants, limiting meaningful contribution to regulatory processes.

ES27: DWCC et al. fully support centralizing the administration of costs awards under an independent, arm's-length body to reduce administrative burden and improve consistency in the processing of cost applications. However, the funding body must apply an Accessibility Lens in all aspects of governance and decision-making. DWCC et al. also support renaming the Broadcasting Participation Fund to Communications Participation Fund (CPF) to reflect the inclusion of telecommunications proceedings.

ES28: There should be no mechanism for the industry to challenge costs after the fact. Adversarial elements in cost applications create unnecessary barriers and divert resources from substantive engagement.

ES29: DWCC et al. supports expanding the CPF board to include representatives from telecommunications, broadcasting, and a neutral Chairperson to ensure transparent oversight and funding integrity. A dedicated Accessibility Director should also be appointed to oversee the automated processing of accessibility-related expenses and serve as a key accessibility resource.

ES30: Regular indexing to reimbursements, per diem rates, and other rates is essential to ensure they remain fair and reflective of current economic conditions. To prevent another decade-long gap in updates, rates should be reviewed on a biennial or triennial basis to keep pace with the rising cost of living.

ES31: Informal activities are essential to meaningful public-interest participation and must be eligible for funding. Industry participants are resourced for this work, while public-interest groups are not, creating inequities that begin before formal proceedings. Funding should support accessibility-related conferences, honoraria for community connectors, and participation in technical bodies. Without such financial support, critical DDBHH perspectives risk being excluded from early policy development and decision-making.

ES32: A funding model similar to Foundation to Assist Canadian Talent on Records (FACTOR) provides a stable and sustainable structure for public-interest participation in CRTC proceedings. However, DWCC et al. believe that government funding should generally be avoided, as shifting political priorities could compromise its long-term sustainability and independence.

ES33: Funding models should ensure that major market entities contribute through revenue-based or threshold-based mechanisms across broadcasting, streaming, and telecommunications. Contributions should reflect each entity's market influence and financial capacity, pooled into a single fund.

ES34: A combined annual total of \$2,665,947, with a three-year stability amount of \$7,997,841, is recommended to be pooled into a single fund. This includes a 15% allocation for accessibility-related costs, ensuring disability-focused groups, including DDBHH communities, can participate equitably in CRTC proceedings without financial barriers.

ES35: DWCC et al. assert that Accessibility Sovereignty, ensuring DDBHH Canadians have access to and control over technologies, policies, and data, should be a core principle in Canada's digital and communications systems. Embedding it in the funding framework reinforces inclusive policy, accountability, and the *Accessible Canada Act*.

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A. Responding to Bell Canada's Intervention

i. DWCC et al.'s Responsible Participation

21. DWCC et al. bring essential, lived, and community-rooted expertise on accessibility issues affecting DDBHH individuals, a population that has historically been marginalized in regulatory and policy-making spaces. Its participation ensures that the unique communication needs and systemic barriers faced by DDBHH communities are meaningfully considered in proceedings that directly impact their digital and communications access.
22. DWCC et al. has consistently acted in good faith across numerous proceedings to prevent accessibility concerns from being sidelined and to promote equitable and inclusive outcomes for all users. This track record underscores the organization's credibility and reliability as a public-interest participant.
23. Since its founding in 2015, DWCC has participated or is currently participating in over 36 telecommunications and broadcasting proceedings and produced more than 300 filings, including 14 surveys and research reports that have informed key policy reforms - most notably the 2019 CRTC Policy Direction on Accessibility, the review for the evolution of Video Relay Services (VRS) in Canada, and its ongoing efforts to ensure that the national 9-8-8 mental health crisis line is fully accessible in American Sign Language (ASL) and Langue des signes québécoise (LSQ).
24. For additional context, DWCC et al. refer the Commission to its *Ten Years of Participation and Lessons for Funding Reform* report, filed on the public record of this proceeding. The report documents DWCC et al.'s sustained contributions since 2015 and provides a longitudinal record of how cost awards have translated into measurable accessibility outcomes.
25. Collectively, these efforts illustrate DWCC et al.'s decade-long commitment to evidence-based, Deaf-led accessibility advocacy and to advancing systemic reforms in telecommunications and broadcasting policy, reinforcing its credibility as a consistent, transparent, and responsible public-interest participant before the Commission.

ii. Recipient of Canadian Association of the Deaf's Prestigious Henry Vlug Award

26. In recognition of its decade of leadership and impact, on October 25, 2025, members of the DWCC and its three co-founders: Lisa Anderson, Jeffrey Beatty, and Darryl Hackett,

were honoured with the 2025 Henry Vlug Award, presented by the Canadian Association of the Deaf – Association des Sourds du Canada (CAD-ASC).

27. The award is named after Henry Vlug, K.C., whose pioneering advocacy secured captioning, interpreter access, and telecommunications equality for Deaf Canadians, and it acknowledges DWCC's continued advancement of those same principles in the modern era. This recognition underscores DWCC's role as a **trusted, ethical, and community-driven accessibility leader in Canadian telecommunications and broadcasting**, and its tangible role in shaping policy and accessibility outcomes.

iii. Challenging the Misleading Portrayal of DWCC et al.'s Cost Applications

28. Bell Canada's portrayal of DWCC et al.'s cost applications as "excessive" is misleading, selective, and ignores both the systemic challenges faced by both accessibility organizations and the valuable contributions DWCC et al. has made to CRTC proceedings.
29. DWCC et al. has always filed its cost applications in good faith, with detailed justifications, and in accordance with the *CRTC Rules of Procedure and Guidelines for Cost Awards*.
30. Bell Canada's characterization of DWCC et al. as abusing the cost award system is an example of creating a **chilling effect on public-interest participants**, particularly those representing marginalized communities. Increased scrutiny and procedural challenges have disproportionately impacted DWCC et al. as an under-resourced organization, risking the erosion of the very principles the Commission has affirmed: equity, accessibility, and inclusive participation.
31. This concern is echoed by PIAC in its support letter to DWCC et al.'s review and vary application. PIAC wrote that it is "... *gravely concerned that the Commission's decision in Telecom Regulatory Order 2025-97 will set a harmful practice to justify inequitable treatment of people with disabilities at future proceedings.*"
32. Moreover, Bell Canada's comments also fail to account for the additional accessibility-related costs that DWCC et al. must incur to ensure equitable participation. For example, survey design, distribution, and analysis must be conducted in ways that are accessible to DDBHH communities. This includes:
- Plain language formatting and technical configurations for clickable boxes
 - Retyped skip-logic instructions for DeafBlind participants who prefer emailed document or paper copies
 - Survey translations into ASL, LSQ, and French, and
 - Individualized outreach through Community Connectors.
33. Participation also depends on the Deaf-Blind and senior communities having access to support staff such as intervenors, Support Service Providers, Deaf Interpreters, and

volunteers who may transport these individuals to accessible settings for assistance.

34. These elements are not optional and are essential to ensure that DDBHH Canadians can fully understand and respond to policy questions affecting their rights and access. Such work is resource-intensive and time-consuming, often requiring specialized expertise and additional coordination.
35. By failing to recognize these necessary accessibility measures, Bell's position overlooks the realities faced by equity-seeking organizations and underestimates the cost of conducting inclusive, community-informed research. These additional efforts are what make participation meaningful and legitimate.
36. The *Ten Years of Participation and Lessons for Funding Reform* report substantiates DWCC et al.'s long-standing record of responsible participation and accountable use of public-interest funds. It details how DWCC et al.'s research, consultations, and filings have directly informed key regulatory milestones, including the 2019 CRTC Policy Direction on Accessibility and improvements to Video Relay Services (VRS). These documented achievements demonstrate that DWCC et al.'s cost applications are not excessive, but rather essential investments that deliver measurable, system-wide accessibility gains for DDBHH Canadians.
37. In [Appendix B](#), there is a snapshot of the survey costs for a few proceedings.

iv. Interim Costs for TBNC CRTC 2025-180

38. Bell Canada's assertion that DWCC et al.'s interim costs application for [TBNC CRTC 2025-180](#), including participation in the [Ottawa Deaf Expo](#) and the use of Community Connectors, is "excessive" reflects a limited understanding of inclusive community engagement practices, particularly with DDBHH communities.
 - a. The Ottawa Deaf Expo, a biennial event which coincided with the proceedings, provided a unique opportunity to connect with DDBHH community members in a culturally and linguistically appropriate setting. In-person engagement is essential for ensuring that marginalized voices are meaningfully included in policy consultations.
 - b. Community Connectors play a critical role in making regulatory proceedings accessible. They help bridge the gap between complex regulatory processes and community understanding. The honorariums recognize their time and effort and are critical for accessibility. This is not voluntary work, but skilled, culturally competent labour to support equitable participation.
39. Thanks to DWCC et al.'s effective use of Community Connectors, the survey achieved a historic high number of participants for TBNC CRTC 2025-180. The survey gathered responses of **1,204 Deaf and Hard of Hearing Canadians and 151 Deaf-Blind individuals**. This outcome marks the survey as a clear success in reaching and

engaging the community.

40. In contrast, the Neil Squire Society received a \$248,511 federal grant from the Accessibility Standards Canada Grants and Contributions Program to produce its “Study on Canadian Emergency Alert Accessibility: National Survey Results – Plain Language Summary” (June 10, 2024).¹ While DWCC et al. commend the contribution, that study itself acknowledged that DDBHH Canadians were underrepresented, and it lacked ASL/LSQ integration and cultural framing.
41. DWCC et al.’s interim application, less than 15% of that amount, produced over 1,300 survey responses, including 150 DeafBlind participants, and 22 interviews, with ASL/LSQ interpretation, translanguaging, and Deaf-led methodology at its core. It is unreasonable for Bell to challenge DWCC et al.’s modest cost application while staying silent on quarter-million-dollar grant-funded projects that failed to center the DDBHH community.

v. First review of Canada’s Video Relay Services (VRS)

42. Bell Canada’s characterization of the cost applications submitted by DWCC et al., DBPC, and CNSDB in [TNC CRTC 2021-102](#) lacks important context. It undermines the legitimate, equity-driven participation of accessibility organizations in complex regulatory proceedings.
43. TNC CRTC 2021-102 was a substantial and multifaceted proceeding, involving broad policy issues with direct and lasting impacts on DDBHH communities. It marked the first comprehensive review of Canada’s VRS since its implementation in 2016..
44. Notably, Deaf-Blind individuals and organizations were **excluded** from the original VRS policy development process in TNC 2013-155². As a result, considerable time and resources were required in the Review proceeding to meaningfully assess and advocate for changes that would make VRS more accessible to Deaf-Blind users, a population with distinct communication needs that had not been adequately considered at the outset. This underscores the importance of inclusive policy development from the beginning, as the absence of key stakeholder perspectives can lead to systemic barriers and the need for costly corrective efforts later.

vi. The Legacy of Exclusion in Deaf Education and Its Contemporary Implications

45. Notably, Bell Canada, a company whose origins are tied to Alexander Graham Bell, operates in a context shaped by historical approaches to Deaf education. Bell’s legacy

¹ Government of Canada, *Advancing accessibility standards research (program) Agreement No. ASC-24/25-069-G* [Grant record], December 15, 2024, Open Government Portal, https://search.open.canada.ca/grants/record/casdo-ocena%2CASC-24_25-069-G%2Ccurrent

² Telecom Notice of Consultation CRTC 2013-155, Issues related to the feasibility of establishing a video relay service, link: <https://crtc.gc.ca/eng/archive/2013/2013-155.htm>

encompasses both the invention of the telephone and his advocacy for the segregation of Deaf people and the suppression of sign languages following the 1880 Milan Congress. These historical approaches highlight the importance of inclusive participation in telecommunications and broadcasting decisions affecting Deaf communities.

46. In 1880, the Second International Congress on Education of the Deaf, held in Milan, Italy, adopted resolutions that declared speech superior to sign language and banned its use in schools worldwide.³ Dominated by hearing educators, the vote institutionalized oralism.⁴ Deaf teachers were dismissed, sign language was forbidden, and Deaf children were often punished for using their natural language.⁵ This history underscores why DDBHH public participants remain essential to ensuring meaningful participation in current regulatory processes.
47. Using his influence and reputation, Alexander Graham Bell promoted speech-only instruction⁶ and argued against the use of sign language, fearing that Deaf people forming social communities and marrying within them might lead to the creation of what he termed a “deaf variety of the human race,”⁷ thereby entrenching audist practices that denied Deaf children access to their own culture, language, and identity. The consequences of Milan persisted for over 110 years, creating what Deaf historians call the “Dark Ages” of Deaf education⁸, during which generations of Deaf people endured linguistic deprivation, cultural suppression, and systemic exclusion from full participation in society.
48. The International Congress on Education of the Deaf itself formally repudiated the 1880 resolutions in 2010, acknowledging that they had caused “deprivation of access to quality education” and “minimal equality in life for Deaf citizens.”⁹ This acknowledgement reinforces that language rights are inextricably linked to human rights.
49. More than a century later, Bell Canada’s continued opposition to equitable cost recovery for accessibility organizations reflects a similar disregard for Deaf agency and participation. By challenging the legitimacy of Deaf-led advocacy through procedural and financial barriers, Bell Canada reinforces the same systemic inequities its namesake

³ *Second International Congress on Education of the Deaf (Milan, 1880)*, Wikipedia, https://en.wikipedia.org/wiki/Second_International_Congress_on_Education_of_the_Deaf

⁴ “Milan Resolution (1880),” RIT InfoGuides, <https://infoguides.rit.edu/deafleader/milan>

⁵ “FlashBACK: Oral Method in Deaf Institutes (Post-Milan 1880),” deaffriendly.com, <https://www.deaffriendly.com/articles/flashback-oral-method-in-deaf-institutes-post-milan-1880>

⁶ “The Influence of Alexander Graham Bell,” Gallaudet University, <https://gallaudet.edu/museum/exhibits/history-through-deaf-eyes/language-and-identity/the-influence-of-alexander-graham-bell>

⁷ Alexander Graham Bell, “*Upon the Formation of a Deaf Variety of the Human Race*” (1884), in *A Deaf Variety of the Human Race*, Gallaudet University, <https://gallaudet.edu/museum/exhibits/history-through-deaf-eyes/language-and-identity/a-deaf-variety-of-the-human-race>

⁸ “Milan Congress of 1880: the infamous moment in Deaf history,” Handspeak, <https://www.handspeak.com/learn/238>

⁹ “2010: ICED, Apologies for Milan Conference,” Deaf History Europe, <https://deafhistory.eu/index.php/component/zoo/item/2010-apologies-for-milan-conference>

helped institutionalize, effectively continuing a legacy of exclusion in a modern regulatory context. This ongoing marginalization demonstrates why equitable cost recovery is essential to support Deaf-led advocacy.

50. Against this historical backdrop, **DWCC et al.'s responsible participation** in Commission proceedings stands in sharp contrast - grounded in transparency, lived experience, and a steadfast commitment to ensuring equitable access and inclusion for all DDBHH Canadians.

vii. David vs Goliath Battle

51. The Consumers Council of Canada (CCC) described the budget disparity between Canada's largest broadcasting and telecommunications companies and public-interest groups as a David-and-Goliath battle, with David unarmed and missing limbs. DWCC et al. fully agree with this powerful analogy, highlighting the significant imbalance in resources with large, well-funded companies that public-interest groups face in participating meaningfully in Commission proceedings.
52. The Manitoba Coalition stated that there is a disproportionate amount of resources between public-interest groups and large telecommunications and broadcasting companies. PIAC further added that public-interest participants have been consistently undervalued, and that their dignity is undermined when their expertise and contributions are not fairly recognized or compensated. DWCC et al. align with these perspectives, emphasizing that public-interest groups often lack the staffing capacity to manage the administrative burdens that large companies can readily handle.
53. Bell Canada's aggressive challenge to DWCC et al. in its intervention underscores the urgent need to create a unified funding system administered by an independent third party. Under the telecommunications model, costs applications are subject to selective scrutiny from large, well-resourced companies, creating a chilling effect on smaller, under-resourced public-interest organizations.

B. One Funding System

54. The BPF-FPR and PIAC align with the Commission's preliminary view that a single applicant process would be a better approach to funding broadcast, telecom, and ONA proceedings. DWCC et al. fully support this direction, as it would streamline the application process and significantly reduce the administrative burden associated with responding to cost award disputes from telecommunications companies. This would enable public-interest and equity-seeking organizations to devote more of their limited resources to substantive policy engagement rather than procedural matters.
55. A single, independent funding body system would help ensure fairness, reduce the administrative burden, and insulate the costs award process from challenges, thereby promoting equitable participation in Commission proceedings. Therefore, DWCC et al.

agree with PIAC that this proceeding is long overdue and urge the establishment of a fair and transparent policy for funding public-interest participation.

56. The Samuelson-Glushko Canadian Internet Policy and public-interest Clinic (CIPPIC) stated that a unified system would lower barriers to entry for public-interest participants, making the process fairer and more accessible. It would also reduce administrative burden on participants, allowing limited resources to be directed toward substantive engagement with the Commission rather than on bureaucracy.
57. The Manitoba Legal Clinic for the Arts has stated that all costs, both interim and final, should be covered through a streamlined process where funding is timely, predictable, and accessible. DWCC et al. agree that access to funding is essential for public-interest organizations to participate meaningfully in Commission proceedings. Without such support, these organizations face financial strain that can limit or prevent effective engagement. This would undermine the inclusivity and integrity of the regulatory process.
58. Bell Canada submits that a single system would “...*reduce administrative complexity, avoid unnecessary duplication, and provide greater certainty for all parties.*” Similarly, Rogers stated that a unified framework would reduce the administrative burden and complexity for cost applicants. The Canadian Association of Film Distributors and Exporters emphasized that a common framework would “*lower administrative burdens and enhance predictability in how applications are assessed.*”
59. The Canadian Anti-Monopoly Project (CAMP) submits that a unified “one-door” application model will improve accessibility, predictability, and timeliness for public-interest participants. DWCC et al. agree with this, as maintaining two separate cost applications creates unnecessary administrative burdens. A single framework would ensure consistent cost allocation, thereby improving fairness and transparency across all participants.

i. Telecommunications Costs Award Procedure

60. Bell Canada proposes that, for broadcasting proceedings, the funding model mirrors that used in telecommunications proceedings. It argues that financial responsibility should lie with entities that have a significant market presence and capacity. Bell also recommends that the Commission continue managing public-interest funding, rather than delegating this function to an external body.
61. Eastlink and Rogers oppose using the BPF-FPR for both telecommunications and broadcasting and support using the telecommunications model to improve accountability, transparency, procedural fairness, efficiency, and responsiveness. Cogeco and Telus also support the use of the telecommunications model for administering participation funding.

62. The Motion Picture Association - Canada echoes this, advocating for the telecommunications costs award procedure, including challenging each party's costs.
63. DWCC et al. fully oppose this approach. Challenging cost allocations creates unnecessary administrative burdens, delays, and uncertainty for public-interest organizations. Additionally, it could deter or undermine meaningful participation. A streamlined, non-adversarial funding process is essential to maintaining fair and inclusive access to Commission proceedings.
64. Without accessible processes - financial, physical, linguistic, and procedural- many individuals and communities will be excluded, regardless of relevant issues. Accessibility must also extend beyond Commission proceedings and be embedded into policy development to ensure equitable and inclusive outcomes.
65. Bell Canada claims that “*greater scrutiny would ensure that only justified costs are awarded and that the process remains fair and accountable.*” DWCC et al. strongly disagree. Based on their experience, increased scrutiny has resulted in a significant administrative burden, requiring them to respond to cost challenges without compensation and diverting time and resources from paid work to unpaid efforts. As a result, the process does not enhance equity and accountability for public-interest groups. Instead, it increases the risk that they will not be compensated during the cost challenge phase.
66. An example is the [Telecom Order CRTC 2025-97](#), in which a total of 183 hours was deducted from DWCC et al.'s cost application: 66 hours related to the cost application itself and 117 hours for work responding to requests for information (RFIs). To meet these demands, DWCC et al. members were required to restructure their schedules and forego paid employment opportunities in order to complete the application and respond to RFIs. It does not automatically lead to better accountability, but uncompensated administrative burden and barriers to meaningful participation. Similar deductions were made to Telecom Cost Orders for DBPC and CNSDB as follows: [CRTC 2025-100](#), and [CRTC 2025-102](#).
67. PIAC fully opposes the telecommunications model, describing it as overly litigious and forcing public-interest participants to expend scarce resources on lengthy battles to recover costs they are rightfully entitled to through responsible participation. DWCC et al. agree with this position.
68. DWCC et al. also agree with PIAC that funding for public-interest participants is essential to ensure balanced and informed Commission decisions. Without this support, industry players risk dominating proceedings, undermining fairness and inclusivity. Sustainable funding is crucial to maintain meaningful participation; however, DWCC et al. **FIRMLY OPPOSES the use of the telecommunications costs award system** as the foundation for such a framework.

69. Telecommunications companies particularly Bell Canada, Rogers, and Telus can be seen as a modern regulatory Cerberus, the three-headed hound of Greek mythology tasked with guarding the gates of the Underworld. These companies act as gatekeepers to cost recovery, challenging applications with aggressive scrutiny, and resisting the recognition of legitimate administrative labour. This creates significant barriers for public-interest participants in CRTC proceedings, forcing smaller, equity-seeking participants to confront a regulatory Cerberus armed with little more than the slingshot David used against Goliath.

ii. Independent Third-Party Fund

70. The Canadian Telecommunications Association has claimed that using a third-party to administer cost participation is “*costly, inefficient, and ineffective*.” DWCC et al. respectfully disagree with this perspective. Based on its direct and limited experience, DWCC et al. find that the BPF-FPR has offered an efficient, accessible, and responsive process for administering cost awards. Moreover, a third-party model significantly reduces the administrative burden on public-interest groups by minimizing the need to respond to cost challenges from telecommunications companies, thereby supporting more meaningful and focused participation in Commission proceedings.
71. The BPF-FPR stated that another third-party entity would require a transition period and a hand-off to avoid disruption to cost awards. DWCC et al. acknowledge this and further emphasize that, as part of this transition, the BPF-FPR must fully adopt an Accessibility Lens in its funding structure and decision-making processes. This includes proactively identifying, removing, and preventing barriers to the application process to ensure equitable access for all, particularly for equity-seeking and disability communities.
72. Sirius XM Canada Inc. opposes the use of an independent third-party to administer funding for public-interest participation, as it does not believe this is the most effective mechanism. Instead, it recommends that broadcasting costs awards be integrated into the existing telecommunications costs award framework. Furthermore, Rogers is strongly opposed to the continued use of the BPF-FPR and its potential expansion.
73. Robin Jackson stated that the BPF-FPR is the best-placed organization to administer participation funding, citing its relatively fast claims processing, its flexibility to adjust to new realities, and its direct and responsive customer service to its applicants. DWCC et al. agree with this assessment and add that these qualities are essential to ensuring accessibility. An efficient, adaptable, and approachable funding body helps remove barriers for equity-seeking and public-interest organizations, enabling them to participate fully and meaningfully in Commission proceedings.

iii. Broadcasting Participation Fund

74. Since its inception in 2011, the BPF-FPR has awarded over \$5.7M in costs to more than 40 public-interest and consumer groups. DWCC et al. is one such recipient, having

received funding that enabled its participation in essential proceedings, including those on closed captioning and *The Path Forward* proceedings. DWCC et al. expresses its sincere appreciation for this support, without which its meaningful participation in these critical processes would not have been possible. Sustainable funding is crucial to ensure DWCC et al.'s continued participation.

75. The BSO supports the continued role of BPF-FPR as the body responsible for administering participation funding, rather than creating a new entity. However, they expressed concern over the BPF-FPR's failure to provide timely notice when funds were running low or when reimbursements would be reduced, so it needs to improve its communication.
76. Telus stated, "*An efficient cost awards system requires one standardized process, clear timelines...*" Building on this, and based on its limited experience with BPF-FPR, DWCC et al. has found their process to be more effective.
77. CAMP reported that the BPF-FPR has faced challenges due to its reliance on sporadic, transaction-based contributions, making its funding sources limited and unpredictable. Additionally, the fund currently does not cover telecommunications and Online News Act proceedings.
78. The BPF-FPR indicated its balance is below \$430,000 with no confirmed future revenue sources, and that it will cease awarding cost claims effective December 31, 2025. The BSO expressed concern about the projected depletion of the Fund by 2026 and recommends that interim funds be allocated to the BPF-FPR to support public-interest participation until a final policy determination has been reached.
79. Telus stated that once the BPF-FPR is depleted, it should be eliminated in favour of a unified ad hoc costs award system similar to the telecommunications costs system that is administered by the Commission. DWCC et al. fully disagree with that position.
80. DWCC et al. are alarmed about the impending depletion of funds and urge the Commission to take immediate action to identify short-term sources of funding to ensure that the BPF-FPR continues its mandate until a final policy determination has been reached in this proceeding. DWCC et al. also support CAMP's position that there must be no hiatus in funding and that transitional measures should be implemented until a new, permanent funding structure is established.
81. BPF-FPR received \$650,000.00 from the Department of Canadian Heritage for the 2023-2025 period. DWCC et al. urge the Commission to explore securing additional funding from the Department, recommending an annual equivalent of at least \$325,000 until a regulatory policy decision is reached as a result of this proceeding.
82. The BPF-FPR has emphasized that a robust, predictable, and reliable source of funding must support the cost of public participation.. DWCC et al. strongly agrees. Without such

a mechanism, the ability of public-interest and equity-seeking organizations to participate meaningfully in broadcasting proceedings is at immediate risk. The absence of sustainable funding not only undermines procedural fairness but also jeopardizes the diversity of voices essential to informed and inclusive development of broadcasting policy.

83. DWCC et al. believe that establishing a single application system, based on a model similar to the BPF-FPR, would help alleviate administrative burdens and create a more accessible, streamlined process for equity-seeking groups. This model could also extend coverage to telecommunications and Online News proceedings.

84. However, DWCC et al. emphasize that funding sources must be timely and predictable. **A stable and accessible funding framework is essential** to maintaining inclusive and effective public participation before the CRTC.

C. Average Costs Awarded

i. Broadcasting from 2020 to 2024

85. Robin Jackson provided a table showing the CRTC broadcasting cost awards issued between 2020 and 2024, totalling \$1,958,972 awarded during that period. The breakdown is as follows:

Year	Broadcasting Cost Awards
2020	\$651,771
2021	\$569,891
2022	\$123,072
2023	\$189,601
2024	\$424,639
TOTAL	\$1,958,972
Yearly Average	\$391,795

ii. Telecommunications from 2020 to 2024

86. Bell Canada provided a table summarizing telecommunications cost awards issued between 2011 and 2024, showing a total of \$6,362,564.30 awarded over 14 years. The breakdown is as follows on the next page:

Year	Telecom Cost Awards
2011	\$500,948.83
2012	\$199,054.97
2013	\$552,160.81
2014	\$367,138.86
2015	\$429,288.75
2016	\$212,705.68
2017	\$1,499,072.57
2018	\$503,830.11
2019	\$670,431.78
2020	\$21,094.95
2021	\$293,282.92
2022	\$374,065.81
2023	\$349,418.13
2024	\$390,070.13
TOTAL	\$6,362,564.30
Yearly Average	\$454,468.88

iii. One Cent Per Mobile Subscriber

87. Bell Canada states, “...the avoidance of administrative burden on applicants is, in practice, a financial burden on respondents and subscribers.” DWCC et al. challenge this framing, as it overlooks the significant resource imbalance between large telecommunications providers and equity-seeking public-interest groups. For community-based organizations representing DDBHH individuals, administrative burden is not a matter of convenience, but a structural barrier to participation.

88. As of June 23, 2025, there were 37.23 million mobile subscribers in Canada¹⁰. The average annual amount of \$454,468.88 in telecom cost awards, which Bell Canada has



¹⁰ [Communications Market Reports - Current trends - Mobile wireless | CRTC](#)

expressed significant concern over, would amount to roughly **one cent per subscriber**.

89. DWCC et al. submit that if such cost awards are considered an unsustainable burden by large telecom providers, a minimal adjustment of **one cent per subscriber** would be sufficient to support these public-interest costs.
90. Given the scale of Canada's telecommunications market, this would have a negligible impact on consumer bills. Yet, it would provide essential support for the continued participation of underrepresented and equity-seeking groups in regulatory proceedings that shape communications access for all Canadians, particularly **DDBHH Canadians who have been historically excluded from policy decision-making processes that contributed to the systemic barriers they now face in the telecommunications sector**.
91. The *Accessible Canada Act* requires the proactive identification, removal, and prevention of barriers. Rather than advancing these obligations, Bell Canada perpetuates the cycle of systemic barriers that continue to deny DDBHH Canadians communication equity in the telecommunications sector.
92. It is notable that the Commission has been designated as one of the federal government's "no wrong door" agencies for receiving complaints or comments related to accessibility. However, there is a certain irony in the government tasking the CRTC with enforcing accessibility standards and conducting related analyses, effectively placing the Commission in the position of policing its own practices. Experience to date suggests there is considerable room for improvement.
93. For the Commission to uphold its mandate in a fair and credible manner, it must more rigorously integrate the *Accessible Canada Act* into all policy decisions, acting in genuine defense of accessibility organizations and the communities they represent. Strengthening this commitment will ensure that the Commission meets not only the latter, but the spirit of its accessibility responsibilities.

D. Cost Structure

94. CAMP reported that the current rates lag behind actual project costs and that both interim and final cost decisions often arrive too late to support ongoing work effectively. DWCC et al. further add that the per diem rates are also outdated.

i. Ensuring Fair Access Through Interim Costs Funding

95. The Indigenous Connectivity Institute recommended automatic interim and advance payments for cash-strapped public-interest groups. DWCC et al. fully support this recommendation, as it ensures that funding remains aligned with the economic needs of CRTC proceedings and helps public-interest groups participate without financial barriers.

96. The Manitoba Coalition stresses that the Commission's participation funding must be **accessible** to support participation, **predictable** so funding can be expected in a timely manner, and **adequate** to reimburse costs at appropriate rates fully. DWCC et al. wholeheartedly support this position, as these principles are essential to ensuring meaningful participation by public-interest groups.
97. The First Mile Connectivity Consortium emphasized that Indigenous and smaller public-interest groups cannot absorb year-long payment delays in receiving cost awards, and that interim funding and advances should be available to ensure their continued participation.
98. CAMP emphasizes that interim and advance costs awards should be used more frequently to alleviate cash-flow pressures faced by public-interest participants during lengthy proceedings. DWCC et al. agree that interim and advance costs awards are essential tools to ensure equitable participation by smaller, equity-seeking organizations that often lack the financial reserves to sustain engagement in complex, multi-phase regulatory proceedings. Providing timely and predictable access to funding not only alleviates cash-flow barriers but also strengthens the overall quality of the public record by enabling meaningful, evidence-based contributions from those directly representing accessibility and consumer interests.
99. The FRPC considers the granting of interim costs in CRTC proceedings to be a reasonable and responsible approach, particularly since many CRTC proceedings take several months to complete. It further recommends that the Commission allow public-interest participants to apply for reimbursement of costs already incurred, recognizing the financial challenges faced by underresourced public-interest groups during lengthy regulatory processes.
100. DWCC et al. agree with the Manitoba Coalition, CAMP, and the FRPC that upfront costs pose a significant barrier to meaningful participation for resource-strapped public-interest groups in Commission proceedings. Therefore, it recommends providing a monthly living accessibility retainer stipend of up to \$2,000 a month for the duration of the proceeding to help minimize this barrier.
101. DWCC et al. recommends a **Monthly Living Accessibility Retainer** to provide modest, predictable support for accessibility experts and consultants in regulatory proceedings. Unlike per diem or project-based models, this retainer reflects the ongoing nature of accessibility work. It covers basic living expenses, not profit, and supports continuous engagement throughout lengthy processes. This approach reduces financial strain, prevents burnout, and values lived expertise as essential to equitable participation. It ensures contributors aren't forced to choose between living expenses and sustained involvement. See [Appendix A](#) for a full definition.
102. In fact, DWCC et al. experienced significant delays in receiving cost awards: 18 months for [BTNC CRTC 2020-81](#); and 17.5 months for [TNC CRTC 2021-102](#). Such

extended delays place an unsustainable financial burden on organizations with limited resources and threaten the ability of equity-seeking groups to engage meaningfully in Commission proceedings.

103. The FRPC stated that participants who must wait for payment for past CRTC work are unable to apply those funds to new proceedings. Similarly, the First Mile Connectivity Consortium (FMCC) stated that public-interest groups should be allowed to request interim funding to cover airfare and hotel expenses for in-person public hearings.

104. DWCC et al. fully agree with the FRPC and the FMCC and add that, without such interim costs, it would not have been able to participate in the in-person public hearings for these proceedings:

- a. [BNC CRTC 2024-288](#) - *The Path Forward - Defining “Canadian program” and supporting the creation and distribution of Canadian programming in the audio-visual sector*
- b. [TNC CRTC 2024-318](#) - *Making it easier for consumers to shop for Internet Services*

105. Access to such interim funding was essential to enabling DWCC et al.’s meaningful participation in these critical Commission proceedings. This type of support must be maintained and strengthened to ensure that financial barriers do not prevent diverse and underrepresented voices from being heard in regulatory processes. DWCC et al., therefore, recommend that the Commission implement this practice of granting interim costs on a permanent basis.

106. CAMP has proposed integrating funding applications directly into the intervention submission process, a proposal that DWCC et al. fully support. On the [BTNC CRTC 2025-94](#) page, the deadline to apply for interim costs is listed as June 11, 2025. DWCC et al. see this as a positive first step that could be further enhanced by making the deadline a clickable link, directing applicants to a simple template for submitting interim cost applications. Such a feature would streamline the process and make funding more accessible and timely.

107. To further emphasize this, CAMP stated that decision timelines for interim costs applications must be expedited. The CIPPIC added that interim funding should follow a fast-track process, with decisions rendered within 15 to 30 days of the application. DWCC et al. agree and further recommend establishing a short timeline for disbursing approved costs, proposing that payments be issued within 10 business days.

ii. Current Rates for Consultants and Analysts

108. PIAC reported that the current reimbursement rates for public-interest participants are significantly lower than those provided by other Canadian regulatory bodies.

109. Robin Jackson's review of tariff rates for legal services, consultants/analysts and expert witnesses used by other public utilities boards found that the CRTC fee rates are, on average, 34% lower than those established by comparable bodies.

110. The FRPC noted that the public-interest rate structure has remained stagnant in the past 18 years, having not been updated since 2007. CIPPIC also stated that current reimbursement rates are unsustainable, as inflation has eroded their value.

111. The following rates represent the current compensation levels by the CRTC for consultants and analysts. These rates are used for reimbursement for professional services provided by public-interest participants in regulatory proceedings.

Years of Experience	Hourly Rate
0-4	\$110.00
5-8	\$165.00
9+	\$225.00

112. DWCC et al. agree that the current rates are outdated and no longer reflect the realities of today's economic environment. Over time, factors such as inflation, increased operational costs, and evolving market conditions have significantly impacted the sustainability of the existing rates. It is essential that the pricing framework be reviewed and adjusted accordingly. Therefore, DWCC et al. urge the Commission to undertake a comprehensive rate adjustment process to address the prolonged rate stagnation.

iii. Proposed Rates for Consultants and Analysts

113. Robin Jackson shared the Ontario Energy Board's tariff rates for consultants and analysts, which are significantly higher than those used by the CRTC. The OEB rates are as follows:

Years of Experience	Hourly Rate
1	\$196.00
6	\$253.00
11	\$303.00
> 20	\$359.00

114. PIAC has called for the doubling of consultant and analyst rates. If a complete doubling is not feasible, PIAC recommends that the rates at least be raised to match those by comparable provincial regulators, such as the OEB. A table of the proposed doubled rates is provided below, while the OEB's rate table is referenced in the paragraph above.

Years of Experience	2x Hourly Rate
0-4	\$220.00
5-8	\$330.00
9+	\$450.00

115. The FRPC shared a table of rates prepared by Sepulveda Consulting Inc., which was commissioned to determine appropriate current consultant and analyst rates. The rates are as follows:

Years of Experience	Hourly Rate
0-5	\$180.00
5-10	\$250.00
11-19	\$310.00
> 20	\$360.00

116. Fédération culturelle canadienne française (LCCF) presented a table of recommended rates, and they are as follows:

Years of Experience	Hourly Rate
0-4	\$160.00
5-8	\$245.00
> 9	\$330.00

117. Option consommateurs stress that the rate increases should reflect the Average Weekly Earnings by Industry index from Statistics Canada, dating back to 2010. By aligning reimbursement rates with this index, the resulting hourly rates would closely match those used by other Canadian regulatory bodies. To support this proposal, they presented a table outlining the adjusted rates.

Years of Experience	Hourly Rate
0-4	\$175.00
5-8	\$260.00
> 9	\$355.00

118. The discrepancy in rates highlights the need for the Commission to review and update its own tariff structure to ensure that public-interest organizations can retain consultants and analysts at competitive rates. Aligning rates used by comparable regulatory bodies, such as Sepulveda Consulting Inc. and the Average Weekly Earnings by Industry index, would support public-interest groups' capacity to engage meaningfully in CRTC proceedings.

119. DWCC et al. support the proposals put forward by both Robin Jackson and the FRPC, and agree that a four-tier rate system would be a fairer approach. However, DWCC et al. emphasize that consultants and analysts with higher education degrees should not begin at the lowest rate tier. Rather, they should be placed at the second or third tier, depending on their educational qualifications.

120. This reflects the reality that individuals with advanced education bring a higher level of expertise and analytical capacity to their work from the outset, reducing the learning curve and increasing the quality and efficiency of their contributions. Aligning compensation with qualifications also supports equitable recognition of professional value and helps attract and retain skilled individuals within the cost award framework.

iv. Current Per Diem Rates

121. Currently, the per diem rates are limited to \$48.00. The table below outlines these rates as established by the CRTC for use in cost applications:

Breakfast	\$10.00
Lunch	\$12.00
Dinner	\$26.00
TOTAL	\$48.00

v. Proposed Per Diem Rates

122. The First Mile Connectivity Consortium (FMCC) has recommended that per diem rates be updated to align with those used by the Government of Canada¹¹. The table for these rates is as follows on the next page:

¹¹ [Daily Total - Meals and Incidentals](#)

Breakfast	\$29.05
Lunch	\$29.60
Dinner	\$60.75
Incidentals	\$17.30
TOTAL	\$136.70

123. The \$88.70 difference in per diem rates reflects a significant disparity. This gap creates an uneven playing field, where public-interest and equity-seeking organizations are expected to operate under outdated and insufficient funding parameters. The current per diem does not accurately reflect the actual costs of meals.
124. Rogers stated “...it may be appropriate to adjust the rates for certain costs, such as private residence accommodation fixed rate, travel by auto per km rate, and meal costs.”
125. DWCC et al. support the FMCC’s recommendation and agree that the daily total of \$136.70 is reasonable and better reflects today’s costs of meals and incidental expenses. Updating the per diem rates would help ensure that public-interest and equity-seeking organizations are not financially disadvantaged when participating in Commission proceedings.

E. Timelines for Processing Cost Claims and Awards

i. Importance of Deadlines

126. The FRPC has stated that the CRTC’s cost award process lacks transparency and accountability and is frequently subject to significant delays.
127. Several parties emphasized the need for a timely and predictable funding process. The FRPC proposed that a public report be published quarterly to track timelines. PIAC urged the Commission to provide clear and transparent timelines, and further recommended the establishment of an explicit deadline for applying for interim costs for each specific proceeding. This would increase certainty and incentivize greater public-interest participation in proceedings. DWCC et al. wholeheartedly support this position.
128. Rogers noted that under the *CRTC Rules of Practice and Procedures*, an application for final costs must be filed no later than 30 days after the deadline for final submissions. It also indicated that as of January 1, 2021, the BPF-FPR has a 12-month deadline to file cost claims.
129. The BSO proposed a 90-day period, from the conclusion of a proceeding, within which organizations may file their cost award applications. DWCC et al. support this

proposal, recognizing that it provides participating organizations sufficient time to gather expenses and prepare thorough applications, without causing undue delay to the overall cost award process. The current 30-day period is too short and may disadvantage public-interest participants with limited administrative capacity.

130. Rogers recommended that the Commission establish deadlines for when cost respondents must issue payments. DWCC et al. respectfully submit that **greater attention should be placed on the length of the decision-making process, including the issuance of costs awards.**

ii. Current Average Timelines

131. The BPF-FPR reports an average turnaround of 45 and 60 days for receiving, processing, and paying cost claims. This is significantly faster than the average processing time under the Telecommunications Cost Awards system.
132. As noted by Robin Jackson, the telecommunications cost award system has an average processing time of 232.5 days. Similarly, FRPC research shows that public-interest participants wait an average of 9.3 months for a CRTC decision after submitting cost applications in telecommunications proceedings.
133. CAMP reported that the current telecommunications cost model has, at times, been delayed due to challenges from cost respondents, resulting in slower reimbursements to public-interest participants. Similarly, PIAC noted that over the past five years, the time required to issue cost orders has more than doubled from an average of 3.7 months to 9.6 months.
134. DWCC et al.'s four longest wait times for its costs awards occurred under the telecommunications costs award system. These examples clearly illustrate that prolonged delays are unacceptable and impose unnecessary financial strain on public-interest participants. The table below provides an example.

Longest wait for cost awards	
BTNC 2020-81	18.0 months
TNC 2021-102	17.5 months
TNC 2022-65	15.5 months
TNC 2016-116	11.5 months

135. To illustrate the scope of DWCC's contributions, the team conducted a cumulative review of all proceedings it has participated in from 2015 to 2025 and compiled the total

number of documents, reports, and cost applications into a summary table. The Commission may find this table in [Appendix D](#).

136. DWCC et al. assert that it is unacceptable that public-interest organizations are required to wait several months to receive their cost awards. Such delays create financial uncertainty and place an undue burden on organizations with limited resources. This, in turn, risks discouraging meaningful participation in Commission proceedings, particularly from equity-seeking and underrepresented communities. The timely disbursement of cost awards is essential to maintaining an accessible and inclusive regulatory process.

iii. Why Timely Cost Awards Matter: Case Studies from DWCC et al.

137. An example of the importance of issuing timely costs awards is DWCC et al.'s participation in the [BNC CRTC 2024-288](#) proceeding. It was essential for DWCC et al. to contribute meaningfully to the definition of "*Canadian program*" and to support the creation and distribution of Canadian programming in the audio-visual sector.
138. DDBHH Canadians have historically been excluded from broadcasting policy decision-making processes, and DWCC et al. were committed to ensuring their inclusion in this critical process. As ASL and LSQ are the primary languages of Deaf people in Canada, it is vital that the Canadian broadcasting system reflects and supports these languages and that DDBHH individuals are meaningfully represented on-screen.
139. However, the 17.5-month delay in receiving its cost order for [TNC CRTC 2021-102](#) has had a cascading financial impact. With its funds nearly depleted, DWCC et al. was forced to request interim costs from the BPF-FPR to attend the public hearing on May 15, 2025. Without that support, DWCC et al.'s participation would not have been possible, and DDBHH Canadians would have remained excluded from a critical policy discussion, further perpetuating their historical marginalization.
140. The interim costs process for [CRTC 2025-180](#) illustrates the systemic delays that place undue strain on community-based accessibility organizations. In this proceeding, DWCC et al. submitted its Interim Costs Application on August 12, the CTA responded on September 2, and DWCC filed its reply the next day on September 3. Despite the file being fully complete in early September, no decision was issued for over two months. As of November 14, when the Commission finally released a bulletin indicating that the interim ruling would be issued this week, the application had been pending for **approximately three months**. Such delays are unacceptable, particularly given the upfront and ongoing expenses, such as transcription services from Eversa, with a cost of \$25,007 that DWCC must pay while awaiting reimbursement. This timeline underscores the need for a more efficient, predictable, and equitable interim costs process to prevent financial hardship for small accessibility organizations participating in regulatory proceedings.

141. Setting and adhering to firm timelines for processing and distributing funds is essential to ensuring timely access to resources and reducing financial uncertainty for public-interest and equity-seeking organizations in Commission proceedings.

iv. Proposed Timelines

142. CIPPIC proposed that cost decisions be issued within 30 days of the final submission deadline, with firm timelines and straightforward access to interim funding. Similarly, the FMCC, ICI, and PIAC recommended that the Commission establish a clear 30-day deadline for issuing funding decisions and reviewing cost claims, to ensure timely processing and reduce financial strain on participants.
143. The FRPC also recommended implementing a 60-day timeframe and paying cost awards to public-interest participants, aligning with the BPF-FPR's typical decision-making period of 1.5 to 2 months. CAMP echoed this recommendation, supporting the adoption of a 60-day decision-making process. Sirius XM Canada Inc. similarly supported a 60-day service standard for CRTC decisions, along with an internal 45-day target for issuing payments. CDGM proposed that decisions on interim cost applications be issued within 15 days, and final payments within 60 days.
144. DWCC et al.'s four shortest wait times for its cost awards were all from the BPF-FPR, ranging from one to two months. These examples clearly demonstrate that significantly shorter timelines are both achievable and necessary. The table below illustrates these cases.

Shortest wait for cost awards	
BNC 2025-48	1.0 month
BNC 2025-2	1.0 month
BNC 2024-288	1.5 months
BNC 2024-137	2.0 months

145. DWCC et al. consider this to be a reasonable and efficient timeline. As noted in its intervention, DWCC et al. recommends that a maximum of 60 days be established for the issuance of final cost awards to ensure timely and predictable support for participating organizations. Furthermore, DWCC et al. recommend that interim costs awards, particularly those related to accessibility expenses, be issued within 15 days.
146. The Ontario Library Association (OLA) recommended a two-stage invoicing option, consisting of an initial claim for the first phase of the proceeding, followed by a final cost claim upon its completion. DWCC et al. agree with this recommendation, noting that it

would help support both the interim and final phases of cost recovery. This approach would ensure that funding remains **accessible**, **predictable**, and **adequate**, principles emphasized by the Manitoba Coalition.

v. Communication on Costs Awards

147. FRPC noted that in the telecommunications costs award process, public-interest applicants lack a designated point of contact, resulting in long delays and uncertainty as months or even years pass without updates on their application status. In contrast, the BPF-FPR model is a timely process with a dedicated Cost Officer whom applicants can contact for updates and assistance, enhancing transparency and predictability.
148. Robin Jackson confirmed that BPF applicants can communicate directly with the Cost Officer, while telecommunications applications are submitted directly to the Secretary-General without an established follow-up contact.
149. DWCC et al. agree that the telecommunications process suffers from inadequate communication and transparency, which undermines participants' ability to plan and engage in new CRTC proceedings. Adopting the BPF-FPR's approach would significantly improve confidence and participation in the costs award system.

F. Accessibility-Related Expenses

i. Accessibility is a Legitimate Expense

150. CAMP stated that eligible costs should extend beyond the traditional categories of legal fees, consultant and analyst time, and disbursements. They should also include accessibility-related expenses such as ASL/LSQ interpretation, translation, and community consultation costs to prepare a representative intervention.
151. Robin Jackson emphasized that being able to claim costs for ASL and LSQ interpreters and translators is essential.
152. The Manitoba Legal Clinic for the Arts further recommended that all costs associated with any private ASL/LSQ interpretation for preparatory work, community consultations, and advisory support be fully recovered. Similarly, the Canadian Association of Film Distributors and Exporters (CAFDE) supported expanding reimbursable costs to include translation, interpretation, and accessibility services. CIPPIC also stressed that all accessibility-related costs must be reimbursable.
153. DWCC et al. align with these positions and further emphasize that essential accessibility supports must be considered as fully recoverable costs.
154. CDGM highlighted that small equity-seeking groups should not be expected to front accessibility-related costs for extended periods. DWCC et al. agree, as this practice

creates a significant financial barrier to meaningful participation in regulatory proceedings.

155. CDGM also recommended that the Commission explicitly recognize accessibility-related expenses as compensable, including:

- a. ASL/LSQ interpreters
- b. Captioning (CART)
- c. ASL/LSQ video production
- d. Deaf Interpreting (DI)
- e. Support Service Provider (SSP)
- f. Administrative and accounting time

156. DWCC et al. support this recommendation and **add that translanguageing must be included in that list of eligible accessibility-related expenses**. Translanguageing ensures informed participation through linguistic and communication equity supports. This term refers to the dynamic and integrative use of multiple languages and modalities, such as ASL, LSQ, written English, and written French, to achieve equitable communication. This is not an auxiliary or optional practice but a **core accessibility process** that requires time, coordination, and multimodal support. As such, translanguageing should be recognized as a standard, reimbursable accessibility cost, eligible for both interim and final cost awards.

157. **DWCC et al. urge the Commission to formally enshrine accessibility supports as fully reimbursable costs.** This is essential to ensuring equitable participation by DDBHH communities and other equity-seeking groups in Commission proceedings. It also aligns with the Commission's statutory obligations under the *Accessible Canada Act* and the CRTC's *2023 Policy Direction*.

ii. Not Optional, But Critical to Equitable Participation

158. Accessibility services are not optional, but are critical to equitable participation, and must therefore must be **automatically covered at the outset of the process without delay or extensive justification**. This includes all interpretation and translation services between:

- a. English and ASL,
- b. ASL and English,
- c. French and LSQ,
- d. LSQ and French,
- e. ASL and LSQ,
- f. LSQ and ASL, and
- g. translanguageing¹²

¹² DWCC et al. (2024, March 15). *Joint Applicants – Cost Applications – Joint Applicants' Reply to Telco Respondents (File 1011-NOC2021-0102)*. Submitted to the Canadian Radio-television and Telecommunications Commission (CRTC).

159. The Manitoba Legal Clinic for the Arts recommended that eligible costs be as inclusive as possible and that recovery costs for accessibility services be enabled. DWCC et al. fully support this recommendation and reiterate that **cost recovery for accessibility services must be automatic upon request, without lengthy approval processes**. This is essential to ensure that people with disabilities can participate equitably in CRTC proceedings.

iii. Intervenor and Support Service Providers (SSPs): Another Form of Accessibility for Deaf-Blind Participants

160. An Intervenor, also referred to in some regions as a Support Service Provider (SSP), is a trained professional who provides essential accessibility and communication support to individuals who are Deaf-Blind. Although terminology and funding models vary across provinces, the core function remains the same: to facilitate Deaf-Blind Canadians' access to information, interaction with others, and navigate environments safely.
161. The extent of support available varies significantly across provinces due to differing provincial funding models. In some provinces, individuals receive as little as nine (9) hours per month of Intervenor service, while in others, access may extend to fifteen (15) hours per week. This uneven landscape creates systemic inequities, as the level of access and independence available to Deaf-Blind Canadians depends largely on their province of residence.
162. Intervenor adheres to a Code of Ethics, emphasizing confidentiality, autonomy, and cultural respect. Their work is highly individualized, tailored to the person's preferred communication mode, whether tactile sign language, print-on-palm, Pro-Tactile, or other systems. This individualized approach demands time and specialized skill, which must be recognized and compensated within accessibility frameworks.
163. Navigating written or technical materials, such as regulatory filings, poses additional barriers for many Deaf-Blind participants. In these cases, an Intervenor (or SSP) acts as both a bridge and interpreter, reading documents, describing visuals, summarizing key points, and translanguaging information into the person's preferred communication mode to ensure comprehension.¹³ These activities are not optional supports; they are prerequisites for meaningful participation in complex policy consultations like those of the Canadian Radio-television and Telecommunications Commission (CRTC).¹⁴

¹³ DWCC et al. (2024, March 15). *Joint Applicants – Cost Applications – Joint Applicants' Reply to Telco Respondents (File 1011-NOC2021-0102)*. Submitted to the Canadian Radio-television and Telecommunications Commission (CRTC).

¹⁴ Canadian Radio-television and Telecommunications Commission. (2024, March 15). *Call for comments – Review of video relay service, Telecom Notice of Consultation CRTC 2021-102 (11 March 2021), 2021-102-1 (26 April 2021), 2021-102-2 (30 June 2021), 2021-102-3 (14 March 2022) and 2021-102-4 (19 September 2023) ("the 2021-102 proceeding") – Cost applications – Joint Applicants' reply to Telco Respondents (File 1011-NOC2021-0102)*. <https://crtc.gc.ca>

164. Unfortunately, the limited number of available service hours and inconsistent funding mechanisms make it extremely difficult for Deaf-Blind Canadians to participate effectively in Commission proceedings. This lack of structural accommodation often necessitates deadline extension requests, which are not discretionary but essential to ensuring accessibility compliance.
165. DWCC et al. therefore urge the Commission to explicitly recognize Intervenor and SSP services as eligible accessibility-related expenses under the costs-awards framework and to treat time extensions requested on these grounds as valid accessibility accommodations.
166. Accessibility supports, including Intervenor, SSPs, and translanguaging, must be viewed not as ancillary costs, but as integral requirements for equitable engagement under the *Accessible Canada Act* and the CRTC's *2023 Policy Direction*.

iv. Automatic Approval for Accessibility Expenses

167. **Accessibility-related costs must never be subject to arbitrary caps**, as they are essential to ensuring full and equitable participation by equity-seeking and disability communities. CTA's proposal reflects an attitudinal and systemic barrier that DWCC et al. have continually worked to dismantle through its Accessibility Lens. The Commission must recognize that accessibility is not an optional cost, but a fundamental right, and funding models must reflect this principle.
168. DWCC et al. further urge the Commission to ensure all parties adhere to the *Accessible Canada Act* and the *2023 Policy Direction*. Treating accessibility as discretionary rather than mandatory risks perpetuating harmful audist practices. The Commission's own regulations require proactive measures to remove barriers, not reinforce them. The CRTC must hold the telecommunications and broadcasting industries accountable and enforce compliance with accessibility organizations' requirements in both spirit and practice.
169. DWCC et al. recommend that the Commission establish a fast-track process for accessibility cost applications, with applications processed immediately and approved and disbursed within 10 days. This would ensure equity-seeking communities are not delayed or prevented from participating due to the additional accessibility costs.
170. Implementing a fast-track mechanism would recognize the urgent and essential nature of accessibility supports, reduce administrative burdens for both applications and the Commission, and send a clear message that inclusive participation is a priority. Timely disbursement would also prevent situations in which organizations must choose between financial risk and participating in policy processes that affect their communities.

v. Dedicated Section for Accessibility in Costs Applications

171. DWCC et al. recommends that the Commission add a dedicated section for accessibility-related expenses in cost applications. This would improve clarity, streamline the review process, and ensure that these essential costs are correctly identified and prioritized. Currently, such expenses may be overlooked or delayed due to a lack of clear categorization. A dedicated section would help ensure consistency in how these costs are treated, reinforce their legitimacy as necessary expenditures, and support the Commission's broader goals of equity, inclusion, and accessibility.

G. Barriers to Participation

a. Current Barriers

i. Cost Challenges from Telecommunications Companies

172. Cogeco stated that cost challenges allow service providers to be informed about how funds are being utilized and to review, access, and comment on cost awards. It further argued that the process must provide industry with an opportunity to scrutinize and respond to cost claims to "ensure a fair process" and "have a say in the cost awards they fund". DWCC et al. respectfully disagree, noting that while transparency is essential, the current process can become unnecessarily adversarial, creating additional burdens and potentially discouraging participation by public-interest participants.
173. CACTUS observed that cost challenges from telecommunications companies often resemble a **court-like process**, creating a stressful and intimidating environment for public-interest participants, particularly those with limited resources. PIAC similarly stated, "*...repeated battles against telecom corporations that exhaust resources that could be directed to strengthening needed advocacy efforts.*" DWCC et al. fully agree with this interpretation and underscore the need for a process that is accessible, non-adversarial, and supportive of meaningful public-interest engagement.
174. CCC noted that challenges to cost applications introduce financial risk as appellate review processes outside of the Commission are not covered under the CRTC's cost award framework. DWCC et al. agree and emphasize that this creates a chilling effect on public-interest participation, especially for smaller, equity-seeking organizations that already operate with limited capacity.
175. Based on its experiences with the telecommunications model, DWCC et al. have faced frequent challenges to its applications, which have significantly increased its administrative burden and created high levels of uncertainty. Extending this system to broadcasting proceedings would perpetuate the cycle of barriers and further discourage the participation of equity-seeking groups, including DDBHH communities, in both policy spaces.

176. PIAC stated, *“The adversarial process for telecommunications costs has been used by the industry to punch down on public-interest intervenors, including PIAC, but in particular groups representing Canadians with accessibility needs.”* DWCC et al. fully agree with this assessment, especially in light of Bell’s blatant attacks on DWCC et al., DBPC, and CNSDB in their intervention for this proceeding.
177. Another recent example is [TNC CRTC 2021-102](#), where DWCC et al. were forced to respond to a cost challenge that appeared to have been dropped by the telecommunications companies. However, it was only after DWCC et al. received significant cost reductions in all of their Telecom Cost Orders: DWCC: [CRTC 2025-97](#); DBPC: [CRTC 2025-100](#); CNSDB: [CRTC 2025-102](#), that each of the organizations applied to review and vary these decisions. These outcomes remain pending.
178. In its letter of support, PIAC expressed grave concern, stating it is *“...puzzled that the Commission would take this unilateral move to set a new costs procedure outside of the review process that is currently underway in one of its telecom costs orders. The decision to tilt the scale further toward massive corporations and away from financially-weak groups that represent vulnerable Canadians comes as quite a shock.”*
179. The CCC has expressed concern that telecommunications companies are aware that prolonged cost challenges increase the financial burden on public-interest groups, reducing the likelihood that they will challenge such practices in the future. DWCC et al. wholeheartedly agree with this assessment. This dynamic undermines fair and equitable participation in Commission proceedings, highlighting the urgent need for procedural reforms to protect public-interest groups.
180. The FRPC noted that telecommunications companies may challenge the cost applications of public-interest participants, and that participants are not reimbursed for the time spent responding to such challenges. DWCC et al. echoes this concern, as the additional uncompensated administrative burden disproportionately affects under-resourced organizations and can discourage continued participation in regulatory proceedings.
181. CDGM states that administrative hurdles represent a systemic barrier that must be removed to enable meaningful participation. At the same time, PIAC notes that the litigious nature of the telecommunications costs process has placed an ongoing burden on public-interest participants. Responding to cost challenges has been a persistent and significant systemic barrier for DWCC et al. since its inception.

ii. Financial Risk

182. The Consumers Council of Canada (CCC) has noted a decline in its participation in CRTC proceedings due to financial risks and uncertainty surrounding cost recovery, compounded by the limited funding available through the Broadcasting Participation Fund. DWCC et al. share this concern and urge the Commission to implement a

sustainable, reliable cost-recovery model to support continued public-interest participation.

183. CCC stated that submitting meaningful interventions often requires significant upfront costs for research and consultants, which can exceed \$100,000. Advance costs are crucial to mitigate the financial risks. DWCC et al. agree, having had to operate for months without upfront funding for its participation in CRTC proceedings.
184. CCC has reported that it has been ghosted by consultants unwilling to work on a cost-recovery basis, due to delays in payment until after the conclusion of a proceeding. Similar challenges have arisen with survey companies, which require payment upfront. These immediate costs cause financial barriers that can prevent participation altogether. DWCC et al. shares this concern, having faced comparable challenges, particularly with accessibility-related expenses that had to be paid in advance and were not reimbursed until several months later.
185. According to research by the FRPC, of the 76 parties that applied for reimbursement of their CRTC costs between 2013 and 2025, only 8 (10.5%) participated in proceedings during half or more of those years. These public-interest groups are:
- a. Public-interest Advocacy Centre (PIAC)
 - b. Forum for Research and Policy in Communications (FRPC)
 - c. Canadian Association of Community Television Users and Stations (CACTUS)
 - d. Union des consommateurs (UDS)
 - e. Media Access Canada (MAC)
 - f. Canadian National Institute for the Blind (CNIB)
 - g. Deaf Wireless Canada Committee (DWCC et al.)
 - h. First Mile Connectivity Consortium (FMCC)
186. DWCC et al. are not surprised by these findings. Sustained participation requires ongoing financial and human resources that many public-interest groups simply cannot maintain under the current recovery system. This highlights the urgent need for a more **accessible, predictable, and adequate** funding model to ensure continued public-interest engagement.

iii. Meeting Deadlines Timely

187. The Consumers Council of Canada (CCC) has stated that the CRTC's 30-day intervention period constitutes a significant barrier, as it provides insufficient time for comprehensive research, analysis, and drafting. DWCC et al. agree, emphasizing that this limited timeframe is particularly challenging for equity-seeking groups that rely on part-time consultants, volunteers, or community contributions. Accessibility-focused public-interest participants also require additional time to coordinate input, ensure accessible communication, and engage meaningfully in complex regulatory processes.

188. The FRPC noted that concurrent deadlines within the same regulated sector increase the burden of participation on under-resourced public-interest participants. DWCC et al. echo this concern. While timelines have improved modestly in 2025, meeting overlapping deadlines remains difficult for accessibility-focused organizations like DWCC et al., which may be involved in multiple proceedings simultaneously.
189. The FRPC also pointed out that cost reimbursement only begins once the CRTC officially announces a consultation or application. As a result, public-interest groups often begin preparatory work, such as research, consultation, and accessibility coordination, without compensation, or forced to scramble to meet tight deadlines after a proceeding is announced. DWCC et al. strongly align with this concern, noting that meaningful accessibility engagement requires continuous readiness, which should be supported and compensated.

iv. Uncompensated Labour in Regulatory Processes

190. Bell Canada stated that time spent completing costs applications should not be reimbursed, as it is merely an administrative task, while Rogers argued that it is “... *an administrative requirement to access public funding, not substantive participation in the proceeding itself.*” DWCC et al. respectfully disagree. Administrative work is an essential and unavoidable part of participating in CRTC proceedings, especially for community-based and equity-seeking groups, who often lack dedicated administrative staff and must divert limited resources to meet funding requirements.
191. Preparing a costs application is not a minimal or automatic task. It involves creating detailed timesheets if required, drafting cover letters, coordinating documents from multiple participants, and accurately completing CRTC forms. For organizations with limited capacity, this administrative work represents a significant investment of time and effort.
192. Moreover, responding to cost challenges and requests for information (RFIs) is often a burdensome and time-consuming process. It requires substantial unpaid labour and is far from a routine formality. In DWCC et al.’s case, members have had to **forgo paid employment opportunities and dedicate time to responding to cost challenges.**
193. An example is the [Telecom Order CRTC 2025-97](#), in which a total of 183 hours was deducted from DWCC et al.’s cost application, where 66 hours related to the cost application itself and 117 hours for work responding to requests for information (RFIs). Similar deductions were made to the Telecom Cost Orders for DBPC and CNSDB as follows: [CRTC 2025-100](#), and [CRTC 2025-102](#). That’s a trade-off that highlights the structural inequities built into the current system.
194. Dismissing this work as non-compensable overlooks the real labour required for regulatory participation, labour that larger, well-resourced entities can absorb, but which smaller organizations like DWCC et al. must manage with extreme care. Denying

compensation for these efforts creates yet another structural barrier to underrepresented voices, particularly for DDBHH communities.

195. This directly undermines the spirit of the *Accessible Canada Act*, which mandates the proactive identification, removal, and prevention of barriers to full participation in all aspects of life. It also contradicts the Commission's stated commitment to equitable and inclusive engagement in its processes. Since the 2012 VRS proceeding, Deaf organizations and the DWCC have repeatedly advised the Commission that the administrative burden placed on DDBHH groups exists because the CRTC has not yet established a dedicated Accessibility Office staffed with DDBHH professionals. Such a unit would allow stakeholder groups to engage directly with the Commission and reduce unnecessary procedural barriers. Because this has still not been implemented, the administrative load continues to fall on under-resourced DDBHH public-interest organizations. It is therefore critical that the Commission recognize and compensate this administrative work, including the preparation of cost applications, to make regulatory participation genuinely accessible and equitable.

196. Therefore, DWCC et al. submit that it is essential for administrative labour to be explicitly recognized and reimbursable under the costs framework.

v. Chasing After Telecom Respondents for Payments

197. CDGM stated they had to "chase multiple telecom respondents" for payment and often received payments without any reference to the relevant proceeding. DWCC et al. agree with this concern. Collecting payments from telecom respondents is an uncompensated administrative burden.

198. An example of this issue is DWCC et al.'s experience with [Telecom Order CRTC 2024-305](#). Although the order was issued on November 27, 2024, and DWCC et al. promptly contacted the costs respondents, it did not receive payment from Rogers until March 14, 2025, more than three and a half months later. DWCC et al.'s chairperson ultimately had to escalate the matter to a Vice President at Rogers in order to secure the payment.

199. Additionally, on August 7, 2025, in [Telecom Order CRTC 2025-198](#) related to this proceeding, the Commission directed that "... *the award of interim costs to the DWCC et al. be paid forthwith by Rogers Communications Inc., Telus Communications Inc., Bell Canada, and Quebecor Media Inc.*" Despite the "**forthwith**" requirement, DWCC et al. received the funds from the telecommunications companies on inconsistent dates, as outlined below:

- a. Rogers - August 25, 2025
- b. Bell Canada - August 29, 2025
- c. Quebecor Media Inc. - September 10, 2025
- d. Telus - September 11, 2025

200. These delays created an unnecessary administrative burden for DWCC et al., requiring repeated follow-ups and additional time spent tracking and reconciling payments. Such burdens divert limited resources away from substantive policy engagement and disproportionately affect smaller public-interest participants. Additionally, collecting payments from telecom respondents remains time-consuming and resource-intensive, diverting limited capacity away from meaningful policy engagement.

b. Potential Barriers

i. Funding Restrictions Create a Chilling Effect on Equity-Seeking Participants

201. The Canadian Association of Broadcasters (CAB) has proposed that the Commission consider capping the amount a public-interest participant may receive in a proceeding, based on the type of process.

202. Bell Canada proposed a fixed costs cap of \$15,000 per participant, regardless of the nature or complexity of the proceeding. At the same time, Sirius XM Canada Inc. suggested using adjustable funding caps, with provisions requiring justifications for any requests to exceed the established limit. Bell Canada further suggested that participants anticipating costs claims exceeding \$15,000 should be required to submit a detailed budget at the outset of the proceeding.

203. The Canadian Telecommunications Association (CTA) added that fee caps would encourage efficiency and define the extent of available funding.

204. DWCC et al. acknowledge the importance of responsible cost management but caution that rigid caps risk undermining meaningful participation, particularly in complex proceedings that demand extensive research, stakeholder consultation, and specialized expertise. Such limitations would disproportionately affect equity-seeking and under-resourced groups, weakening the diversity of voices in regulatory processes.

205. As PIAC noted in its letter of support for DWCC's recent review and vary, "*This arbitrary barrier to access may disproportionately affect the ability of Deaf and DeafBlind advocacy groups to effectively participate in telecommunications proceedings.*"

206. Rogers proposed a maximum total cap per proceeding, scaled by complexity, ranging from \$1,500 to \$225,000. DWCC et al. is deeply concerned that this would create a "Hunger Games"-style competition among participants, which would be fundamentally disadvantageous to smaller public-interest participants and directly counter [to] the Commission's objectives of inclusive participation.

207. In contrast, CIPPIC strongly opposes a flat-fee or block funding model, arguing they risk underfunding or overfunding participation due to the unpredictable nature of proceedings.
208. DWCC et al. **fully oppose fixed or capped funding models**. They would arbitrarily limit the ability of equity-seeking groups to participate meaningfully, especially in complex regulatory proceedings. They would also hinder DWCC et al.'s ability to retain senior consultants or analysts with the expertise required to represent the community's interests effectively. The suggestion that junior or less experienced personnel be the default expectation is inappropriate and inconsistent with the principles of effective representation.
209. While cost reasonableness is important, rigid caps risk undermining meaningful participation. This must not come at the expense of accessibility, equity, or effectiveness. Cost management measures must be flexible, transparent, and inclusive, not restrictive.
210. Finally, DWCC et al. express significant concern regarding the **chilling effect created by the following Telecom Orders: [CRTC 2025-97](#), [CRTC 2025-100](#), and [CRTC 2025-102](#)**. This order has caused renewed calls for cost restrictions, increasing financial uncertainty and discouraging public-interest participation. In its letter of support for DWCC et al.'s review and vary application, PIAC warned that *"this decision will have a significant 'chilling effect' on future public-interest participation and on the participation of accessibility groups in Commission proceedings."*

ii. Formal Requests to Intervene

211. Bell Canada proposes that the Commission require participants to submit formal requests to intervene at the outset of a proceeding and that they meet the eligibility criteria as a prerequisite for costs eligibility.
212. DWCC et al. oppose the requirement to formally request to intervene, as it would create additional procedural barriers for equity-seeking participants. Public-interest groups often have limited resources and capacity to navigate formal intervention processes at the outset of a proceeding. This requirement risks excluding marginalized groups, such as DDBHH communities, from participating meaningfully in regulatory processes that directly impact them.

iii. Streamlining Eligibility: Multi-Year Model

213. Eastlink recommends confirming proceeding-specific eligibility in advance to limit funding requests that are likely to be ineligible. It proposes reviewing eligibility criteria at three intervals: annual registration, proceeding-by-proceeding assessments, and at the time of funding application.

214. Telus urges the Commission to consider implementing an annual eligibility review, allowing applicants to demonstrate their cost eligibility once a year instead of every proceeding.
215. CAMP argues that public-interest participants should not be required to repeatedly demonstrate cost eligibility in every proceeding, as this imposes unnecessary administrative burdens on applicants and the Commission. It recommends a standing eligibility model where frequent participants have eligibility established annually or biennially.
216. Robin Jackson noted that the Ontario Energy Board defines “Frequent Intervenor”, allowing a person or organization to file organization information once or every two years. PIAC further suggests the Commission consider implementing a process similar to the OEB’s Frequent Intervenor Form.
217. The BSO highlighted that requiring smaller public-interest participants to establish basic eligibility adds undue administrative burden. Similarly, CIPPIC described the process of demonstrating eligibility for every proceeding as “*an inefficient and redundant process*,” recommending a multi-year eligibility model, perhaps spanning three to five years that enables participants to focus on substantive contributions.
218. The FRPC concurs, emphasizing that individuals and public-interest groups should not be required to prove eligibility with every application, provided that their previous submissions raised no concerns. Parties already known to the CRTC should only be asked to provide such information again if a complaint arises.
219. DWCC et al. supports these positions, noting that it would support a more efficient and less burdensome application process for trusted public-interest groups, allowing them to demonstrate how their involvement will further the record and their need for financial assistance.
220. Collectively, adopting a flexible, multi-year eligibility framework would enhance procedural efficiency, reduce unnecessary burdens, and promote inclusive, meaningful participation in CRTC proceedings, advancing the Commission’s commitment to fairness and accessibility.

iv. Budget Pre-Condition

221. Bell Canada submits that a detailed budget should be required at the outset of each proceeding as a precondition for costs eligibility, with the option to request additional funds by updating budgets as the proceeding evolves. DWCC et al. oppose this proposal, as it would impose an unnecessary and disproportionate burden on equity-seeking organizations, particularly those representing DDBHH communities.

- 222.** While DWCC et al. have submitted interim cost applications in the past, these have typically represented only a fraction of the total costs. The applications were narrowly focused on essential, time-sensitive disbursements, including invoices for accessibility-related services, monthly living accessibility retainers, participation costs for the Ottawa Deaf Expo, and honoraria requiring upfront payment. These requests were submitted to enable equitable and accessible participation and should not be mischaracterized as comprehensive budgets.
- 223.** Crucially, the full scope of a proceeding and its procedural demands are often not known at the outset. Requiring detailed budgets in advance assumes a level of predictability and administrative capacity that many public-interest participants lack. Such a requirement risks excluding or discouraging participation from precisely the very groups the Commission has committed to include in its regulatory processes.
- 224.** Bell Canada claims that setting a budget at the outset of proceedings would enhance accountability and clarify financial expectations. DWCC et al. strongly disagree. In its intervention, Bell Canada was sharply critical of DWCC et al.'s request for interim costs related to the [Ottawa Deaf Expo](#) (September 20, 2025) and the use of community connectors in the context of [TBNC CRTC 2025-180](#). As outlined in paragraphs 11 and 12, this criticism illustrates how rigid budget requirements can be weaponized to challenge and undermine accessibility-focused participation.
- 225.** Establishing fixed budget expectations at the outset does not inherently lead to greater accountability; scrutiny over expenditures will remain regardless. What is truly needed is a flexible, transparent process that recognizes the realities of community-based accessibility work, particularly from historically excluded groups such as DDBHH communities.
- 226.** Bell Canada further proposes that budgets be mandatory when the applicant plans to conduct surveys or research reports. While Bell Canada acknowledges that the survey study may be appropriate in certain cases, it argues that the specific methodology, approach, and associated costs, may not be justified. DWCC et al. unequivocally reject this position.
- 227.** To date, DWCC et al. have conducted over 13 surveys, each survey uniquely tailored to the specific issues and context of the proceeding. These surveys are developed using plain language and made accessible in both ASL and LSQ to ensure meaningful participation from DDBHH communities. Imposing a detailed budget at the outset of each proceeding would create an undue administrative burden and limit the flexibility to adapt survey design as proceedings evolve. Such flexibility is essential for relevance, accessibility, and effectiveness.
- 228.** Over the past five years, DWCC has transitioned from undertaking large, resource-intensive national research projects to implementing a more coordinated, digitally enabled, and cost-efficient model of Deaf-led regulatory participation. During this

period, the organization invested 1,600 consultant hours and \$309,532 in professional fees to strengthen internal systems, shorten project timelines, and reduce disbursement spending, from more than \$26,000 in 2020 to approximately \$3,000 in 2025. DWCC has increased its efforts in scoping out other Deaf community members in Canada to become junior consultants. To optimize the allocation of expertise and resources, DWCC has strategically assigned certain tasks to junior consultants. Tasks that are well-suited to junior level, such as preparatory research, data entry, documentation, and producing initial drafts, are delegated accordingly. This enables senior consultants to focus their efforts on activities that require specialized knowledge or advanced analytical skills, such as policy analysis, regulatory strategy, and complex stakeholder engagement. By aligning each team member's responsibilities with their experience level, DWCC ensures efficient project workflows, maximizes the impact of expert contributions, and supports the professional development of junior consultants through targeted assignments and mentorship.

- 229.** These developments reflect increased governance maturity, enhanced documentation and reporting practices, and strengthened audit readiness. Concurrently, DWCC expanded its accessibility impact through bilingual and signed surveys, promoting equitable participation of Deaf, DeafBlind, and hard of hearing Canadians in federal policy processes. Collectively, these outcomes demonstrate that DWCC has evolved into an efficient, accountable, and influential leader in accessibility policymaking, balancing fiscal responsibility with community-driven public interest objectives. To read our new junior consultants' neutral analysis of the spreadsheet in [Appendix B](#), read the written analysis in [Appendix C](#).
- 230.** Finally, DWCC et al. support the BSO position that prior acceptance of cost applications should provide standing for reimbursement in all future consultations. This would reduce procedural repetition, bring greater clarity to cost processes for public-interest participants, and help ensure that underrepresented communities are not excluded due to procedural red tape.

v. Requirement to use Junior Consultant and Analysts

- 231.** Bell Canada submits that applicants should be required to rely on junior counsel, consultants, and analysts to the greatest extent possible, as a codified standard for responsible participation. DWCC et al. strongly disagree. Such a requirement would impose significant barriers to participation for DDBHH communities and is inconsistent with principles of equity and accessibility.
- 232.** DWCC et al. notes that there is no guarantee of a sufficient pool of interested DDBHH individuals, particularly those with the necessary experience in accessibility issues, who could reliably fulfill junior roles. Mandating reliance on such individuals may unintentionally exclude or disadvantage DDBHH participants, limiting their ability to contribute meaningfully to regulatory processes. Rather than fostering responsible

participation, this standard risks narrowing the scope of representation and undermining the quality, accessibility, and inclusivity of the Commission's processes.

233. A key barrier to developing and retaining junior accessibility consultants is the financial precarity many individuals in this field face. As demonstrated in TNC CRTC 2024-294, DWCC et al.'s survey results revealed that:

- a. **36%** have an income of \$35,000.00 or less, and
- b. **72%** of those without paid employment rely on government benefits, such as CPP-D, PWD, OAS, or EI.¹⁵

234. These programs impose strict income thresholds that cap what recipients can earn through stipends or honoraria before clawbacks, jeopardizing an individual's eligibility for essential income support. This creates a chilling effect for potential consultants who may be forced to choose between crucial financial stability and participating in Commission processes.

235. For junior consultants operating without financial reserves, a months-long delay in cost reimbursement worsens this financial stress, making sustained involvement in extended CRTC proceedings impractical. As a result, DWCC et al. and others face ongoing challenges in recruiting and retaining a trained, stable pool of accessibility consultants and analysts.

236. This reality creates an unintended but powerful disincentive for persons with disabilities and lived-experience experts to engage in accessibility advocacy or regulatory participation, even in junior roles. Rather than mandating the use of junior personnel, the Commission should prioritize flexibility, equitable compensation, and timely reimbursement practices that support meaningful, sustainable participation from equity-seeking groups.

H. The Path Forward

a. Building on the Broadcasting Participating Fund

237. The BSO noted that if the BPF-FPR were to assume responsibility for administering telecommunications cost awards in addition to broadcasting, it would be necessary to change the entity's name to reflect its expanded mandate.

238. PIAC supports this expansion and recommends renaming the BPF-FPR to the Broadcasting and Telecommunications Participation Fund. Under this model, the fund would receive and process all cost claims for public-interest participants in both Broadcasting and Telecommunications proceedings. This approach would centralize and

¹⁵ DWCC et al., *Survey Report V2 – TNC CRTC 2024-294-3* (March 12, 2025), p. 32, available at: https://bit.ly/DWCC_et_al.surveyreport2024294 (retrieved on October 8, 2025).

unify the funding regime, with independence, transparency, and efficiency as core guiding principles.

- 239.** The FRPC proposes using the BPF-FPR as a model to establish a new organization responsible for managing cost applications, including incidental costs related to CRTC proceedings. This new body, tentatively named the Communications Participation Fund (CPF), would be designed to support and strengthen public-interest participation across both sectors.
- 240.** DWCC et al. fully support centralizing the administration of costs awards under an independent, arm's-length body. The unified fund would enhance transparency, reduce administrative burden, and improve consistency in the processing of cost applications.
- 241.** However, DWCC et al. emphasize that any such funding body must operate in full compliance with the CRTC's statutory obligations, particularly under the *Accessible Canada Act* and the *2023 Policy Direction*. These obligations must be extended to the administration of costs awards to ensure that accessibility barriers are proactively identified, removed, and prevented.
- 242.** Doing so would promote consistency, accountability, and equitable treatment across all proceedings, aligning the funding process with the Commission's broader commitments to inclusion and accessibility. To that end, the funding body must adopt an Accessibility Lens in all aspects of governance and decision-making.
- 243.** Finally, DWCC et al. underscore that public-interest participants must be meaningfully consulted before any new rules or procedures are established. In Telecom Orders [2025-97](#), [2025-100](#), [2025-102](#), the Commission unilaterally imposed a 24-hour cap on cost applications, despite the proceeding already being underway.

b. Communications Participation Fund (CPF)

i. DWCC et al.'s Endorsement of the CPF

- 244.** DWCC et al. fully support the FRPC's recommendation to rename the BPF-FPR to the Communications Participation Fund (CPF). This title more accurately reflects its broader mandate to support public-interest participation across both broadcasting and telecommunications. The change is minimal, replacing a single word, yet meaningful and memorable.
- 245.** CAMP noted that the BPF-FPR has provided valuable support for broadcasting proceedings and demonstrated that an arm's-length entity can distribute funds effectively. DWCC et al. are confident that the proposed CPF can successfully assume the mandate of distributing costs awards for both broadcasting and telecommunications proceedings.

246. The FRPC noted that the purpose of the CPF would be to administer a fund that receives annual and predictable contributions to reimburse qualified public-interest participants for their costs in CRTC broadcasting and telecommunications proceedings. The fund would operate efficiently, in a timely and businesslike manner, and also provide financial support for research, expertise development, and conferences.
247. DWCC et al. believe that the CPF would streamline the costs application process, significantly reduce the administrative burden on public-interest participants, and allow for more timely reimbursements.
248. DWCC et al.'s *"Ten Years of Participation and Lessons for Funding Reform"* report, already filed on the record, provides clear evidence of the public-interest value produced through modest, well-administered cost awards. Over the past decade, these funds have enabled DWCC et al. to conduct national research, coordinate Deaf-led consultations, and produce over 300 evidence-based submissions that have advanced accessibility policy across both the telecommunications and broadcasting sectors. The demonstrated impact of these activities underscores why a sustainable, unified, and accessibility-centred funding framework, such as the proposed CPF, is critical to maintaining and expanding meaningful Deaf-led participation in future Commission proceedings.
249. Additionally, CPF funds would allow public-interest participants to be reimbursed for work outlined in the CRTC's three-year plan, regardless of whether or not a related proceeding is currently active. The fund would provide for automatic disbursement of accessibility-related expenses within 10 business days and support equitable participation and inclusive innovation, particularly in relation to accessibility in telecommunications and broadcasting.

ii. Supporting a Non-Adversarial, Accessible Cost Awards System

250. The Consumers Council of Canada has stated that **there should be no mechanism for industry to challenge costs after the fact**. At the same time, PIAC strongly recommends that the Commission eliminate the adversarial element from all cost applications. PIAC emphasizes that the current process creates unnecessary barriers for public-interest participants and diverts resources away from substantive engagement.
251. DWCC et al. fully support this position. Eliminating post-decision cost challenges would significantly reduce the administrative burden on equity-seeking groups. These challenges consume valuable time and resources, often without compensation, that could otherwise be directed toward meaningful participation in regulatory proceedings.
252. A recent example illustrates this burden: On October 17, 2025, Bell Canada submitted comments challenging DWCC et al.'s costs application for the [TNC CRTC 2024-318-4](#) proceeding. Responding to Bell Canada's letter required several hours of DWCC et al.'s limited capacity, time that would have otherwise been spent on two active

proceedings: [BTNC CRTC 2025-94](#) and [TBNC CRTC 2025-180](#). This diversion of effort toward unpaid administrative work highlights the disproportionate burden placed on smaller public-interest participants.

253. Such challenges not only delay the process but also undermine the effectiveness of public-interest participation. For these reasons, DWCC et al. urge the Commission to eliminate mechanisms that allow for post-decision cost challenges.

iii. Board Structure of the CPF

254. Robin Jackson stated that an expanded BPF-FPR would require an enlarged board of directors: at least two from broadcasting/online news, two from telecommunications, and an impartial chairperson. On the other hand, the FRPC proposed that the CPF be governed by a seven-member board composed of a neutral Chairperson, three members with telecommunications expertise, and three members with expertise in broadcasting.
255. Both Robin Jackson and the FPRC recommended hiring a full-time Executive Director to oversee the cost awards process and provide outreach and education to public-interest participants.
256. DWCC et al. support expanding the CPF Board. A balanced board with representatives from both telecommunications, broadcasting, and a neutral Chairperson ensures transparent oversight and funding integrity.
257. To strengthen this framework, DWCC et al. recommend appointing a dedicated Accessibility Director to the board. This individual should bring lived experience or professional expertise in disability and accessibility issues, helping to ensure that the fund's policies and operations are grounded in accessibility principles.
258. The Accessibility Director would oversee automated processing of accessibility-related expenses: ASL/LSQ interpretation, captioning, accessible formats, and communication supports, reducing delays, improving predictability, and ensuring consistent treatment of costs. Additionally, the Accessibility Director would serve as a key accessibility resource, guiding expense guidelines, monitoring performance, and supporting outreach alongside the Executive Director.
259. Appointing an Accessibility Director would embed accessibility at the CPF's core, ensuring disability-led organizations are supported equitably. This structure would enshrine the principle of *Nothing About Us Without Us*, making inclusive participation a built-in, not optional, feature of the public-interest funding system.

iv. Indexing rates to Inflation

260. Numerous public-interest participants emphasized in their interventions that the reimbursement rates must be indexed to inflation to ensure they remain fair and reflective of current economic conditions. Without regular adjustments, the real value of these rates erodes over time. DWCC et al. fully agree with this position, as regular indexing is essential to ensuring that equity-seeking groups can continue to contribute effectively to regulatory proceedings.
261. Robin Jackson noted that regular adjustments would also be necessary for the contributions made by telecommunications and broadcasting companies to the independent third-party fund, to keep pace with inflation.
262. To avoid another decade-long gap in rate updates, CAMP recommends implementing a periodic review, such as a triennial review tied to inflation or cost-of-living indices. Similarly, PIAC proposed that rates be automatically indexed to the Consumer Price Index (CPI) every two years to ensure they keep up with the cost of living.
263. Option consommateurs suggested that future rate increases should be based on Statistics Canada's *Average Weekly Earnings by Industry* index, with adjustments retroactive to 2010.
264. DWCC et al. urge the Commission to adopt a transparent and predictable approach to adjusting reimbursement rates on an annual basis, ensuring they remain fair, effective, and reflective of current economic conditions. Less frequent updates risk allowing rates to lag behind the rising cost of living, undermining meaningful participation.

v. Ensuring Accessible and Responsive Support under the CPF

265. Robin Jackson, former Chair of the BPF-FPR, noted that the fund offers direct and responsive customer service to its applicants through the Cost Officer, who is available to answer questions about the application process and to notify applicants if any information is missing.
266. OLA stated that “... *the administrators of the fund were accessible for answering questions and dealing with irregular issues.*” The DSO reported positive experiences, while CACTUS noted that their claims were paid in full and in a timely manner in the early years.
267. DWCC et al. agree that having a dedicated contact person is essential for timely communication throughout the application process. This level of accessibility is critical for smaller public-interest participants that may require guidance or clarification when navigating cost award procedures.
268. Based on DWCC et al.'s limited experience with BPF-FPR in 2025, the process has been seamless. The Cost Officer provided communication regarding the requirements

for the costs application, including which hours were disallowed, the need for individual timesheets, and the expected disbursement dates.

vi. Informal CRTC Activities

- 269.** CIPPIC believes that funding must be available for all Commission-led activities, including informal consultations and technical committees, with the guideline that any Commission-convened policy development activity is eligible for funding. They note that modern policymaking is not confined solely to formal writing.
- 270.** Similarly, CAMP emphasized that Commission-organized workshops, technical committees, policy roundtables, and other consultative sessions that directly contribute to the Commission's policy development or decision-making should be considered part of the broader regulatory process and eligible for funding.
- 271.** PIAC argues that any work undertaken outside or before the Commission proceeding on issues under its jurisdiction should generally be reimbursable, including any quantitative and qualitative surveys and research before or outside formal Commission proceedings. The FRPC echoes these concerns, stressing the importance of democratic participation and fair access to regulatory processes.
- 272.** In contrast, CAB reported that, given the financial challenges of the broadcast sector, expanding the scope of public participation funding must be avoided to minimize the need for additional funds. The Canadian Telecommunications Association argued that the telecommunications costs recovery model should not be used to support activities outside CRTC proceedings. Cogeco and Bell Canada echoed these concerns, asserting that funding should remain strictly limited to formal proceedings to align with the original intent of costs awards. Rogers further stated that informal activities do not constitute official proceedings and thus do not qualify for funding under the current legal framework.
- 273.** DWCC et al. respectfully disagree. Informal CRTC activities often provide the most accessible forums for equity-seeking groups and DDBHH participants to engage meaningfully. Without funding for participation in these activities, marginalized voices risk further exclusion, undermining the Commission's commitment to inclusive, equitable, and representative participation.
- 274.** DWCC et al. emphasize that activities outside of CRTC proceedings benefit the Commission by enhancing its regulatory effectiveness, informing its policy development, and reinforcing its leadership in promoting accessibility within Canada's broadcasting and telecommunications systems. Providing financial support for attendance helps remove barriers related to travel, accommodation, and registration fees, enabling broader and more inclusive participation.

- 275.** A recent example of this is DWCC et al.'s participation in the Ottawa Deaf Expo on Saturday, September 20, 2025. DWCC et al.'s attendance was explicitly intended to support the Commission's efforts to engage with the DDBHH community. Two tables were booked: one focused on educating attendees about DWCC et al.'s mandate and activities, laying the groundwork for community members to complete the survey at the other table related to TBNC CRTC 2025-180, *Improving the National Public Alerting System*. The goal was to better understand the barriers to the system and identify changes that would make it more accessible to DDBHH communities. As such, costs related to travel, accommodation, and meals were essential and should be eligible for reimbursement.
- 276.** CIPPIC stated that it is a matter of procedural fairness and parity to include activities that occurred in informal settings where stakeholders define problems and frame the scope of future proceedings. While industry representatives are compensated by their employers to participate in these meetings, public-interest participants typically are not.
- 277.** Additionally, CIPPIC noted that this imbalance risks tipping the scales in favour of corporate interests before a formal proceeding even begins. Providing funding for such activities is essential to ensure a level playing field and enable a more balanced, inclusive dialogue.
- 278.** OLA stated that any meeting where the Commission benefits from the public-interest groups should be compensable, including roundtables, consultations, and capacity-building related to public consultations and new regulations that impact their communities. CAMP also added that activities such as Commission-organized workshops, technical committees, policy roundtables, and other consultative sessions directly contribute to the Commission's policy development or decision-making.
- 279.** DWCC et al. entirely agree with OLA's and CAMP's position. public-interest groups should not be expected to subsidize the Commission's work. If the work has value to the public-interest, participants must be fairly compensated. DWCC et al. additionally emphasize that early-stage funding would help integrate community perspectives earlier in the regulatory process and reduce the exclusion of valuable insights from public-interest groups who are unable to participate without financial support.

Relevant Foundational Work

- 280.** The Quebec English-language Production Council (QEPC) reported that funding is needed for research conducted outside of formal CRTC proceedings, as this research provides essential context for those proceedings.
- 281.** The OLA added that such funding is essential to prepare key public-interest participants in advance of Public Notices. Similarly, PIAC emphasizes the importance of reimbursing background work performed outside formal processes, noting it is often highly relevant to the issues under consideration.

- 282.** DWCC et al. entirely agree with QEPC, OLA, and PIAC on the necessity of compensating preparatory and contextual work that occurs outside of proceedings. For equity-seeking and accessibility-focused public-interest participants, this type of work is crucial to building capacity, ensuring meaningful participation, and producing informed interventions once a proceeding is launched. Without funding for such early-stage efforts, public-interest input risks being delayed, incomplete, or excluded altogether.
- 283.** To date, DWCC et al. has conducted 13 nationwide surveys, each tailored to the specific issues and context of a relevant proceeding. The most recent survey was conducted for TBNC CRTC 2025-180, *Improving the Public Alerting System*. It ran for approximately six weeks, from August 27, 2025 to October 6, 2025, and engaged over 1,300 DDBHH Canadians, supported by seventeen community connectors across the country.
- 284.** This experience underscores the importance of providing adequate timeframes for public consultations. High-quality, representative surveys require sufficient time not only for outreach and data collection, but also for thoughtful analysis and report writing, a process can take up to three weeks.
- 285.** DWCC et al. urge the Commission to recognize all work, whether conducted outside or within the formal dates of a proceeding, as reimbursable. Without adequate compensation for this foundational work, meaningful participation is significantly hindered, and critical perspectives risk being excluded from the regulatory process.

Conferences and Events

- 286.** The FRPC stated that a small portion of the CPF could be allocated to support the public-interest equivalent of educational events. DWCC et al. fully support this proposal. Accessibility-related conferences or events are essential to ensuring the equitable participation of DDBHH communities and advancing knowledge about emerging technologies that directly impact the lives of DDBHH Canadians.
- 287.** DWCC et al. believes that participation in relevant conferences and events is essential for staying informed on accessibility issues and emerging best practices, knowledge that ultimately enhances the quality of input provided to the Commission and supports more informed, inclusive decision-making over the long term.

Honoraria

- 288.** CAMP urges the Commission to consider allowing modest honoraria for those who contribute their time and expertise, noting that this support assists public-interest participants in preparing a representative intervention. DWCC et al. fully agree with this position. Honoraria are critical for accessibility, as this work is not voluntary, it is skilled, culturally competent labour that supports equitable participation.

289. Fourteen community connectors were a key factor for DWCC et al. achieving its historic high number of engagement for TBNC CRTC 2025-180, with **1,204 Deaf and Hard of Hearing Canadians and 151 Deaf-Blind individuals** participating in its national survey. Connectors were assigned to each province, where they engaged directly with their respective communities to support participation in the survey.
290. Given that the current National Public Alerting System (NPAS) is not fully accessible to DDBHH Canadians, it was essential for DWCC et al. to engage meaningfully with these communities. This outreach will ensure that DWCC et al.'s upcoming intervention is both representative and fulsome, enabling the Commission to better understand the barriers DDBHH Canadians face with NPAS and to make informed recommendations for improving the system.
291. DWCC et al. recommend that the Commission formally recognize and fund community connector roles as eligible costs, through honoraria or other appropriate compensation mechanisms, starting with TBNC CRTC 2025-94 and continuing in all future proceedings where targeted community engagement is essential.

CRTC Interconnection Steering Committee (CISC)

292. Rogers opposes funding participation in CISC meetings as its task is related to technological, administrative, and operational issues on matters assigned by the CRTC or initiated by the public, outside of the Commission's jurisdiction. Cogeco added that the CISC consists of industry groups that would be of little benefit to include public-interest groups.
293. PIAC reported that a lack of funding has prevented them from participating in the CISC, despite the direct impact such technical matters have on Canadian end-users. DWCC et al.'s chairperson has voluntarily served on the Emergency Services Working Group (ESWG) for seven years, offering vital accessibility expertise.
294. DWCC et al. support PIAC's position that participation in CISC should be compensated. Given the Commission's statutory obligations under the *Accessible Canada Act* and the CRTC's *2023 Policy Direction*, DWCC et al. play a key public-interest role in ensuring RTT 9-1-1 Next Generation is developed with a strong accessibility lens. This is a monthly commitment that leverages the chairperson of DWCC et al.'s extensive knowledge and expertise.
295. Due to financial constraints, the chairperson was unable to attend the National Emergency Number Association - Ontario Chapter (NENA Ontario) conference and workshops held in London from September 8-12, 2025. This also meant missing out on valuable networking opportunities that could have further advanced accessibility in Canada's 9-1-1 systems for DDBHH Canadians.

296. CIPPIC emphasized that participation in CISC is a matter of procedural fairness and parity. At the same time, the FRPC stressed that it is essential to ensure democratic participation and equitable access to regulatory processes. Leaving CISC participation unfunded has tipped the scales in favour of industry, whose representatives are already compensated by their respective employers.

297. DWCC et al., therefore, urge the Commission to make funding available to support meaningful public-interest participation in CISC and related technical activities.

c. Funding Structure

i. Foundation to Assist Canadian Talent on Records (FACTOR)

298. The CCC recommends that the Commission consider adopting a funding model similar to *FACTOR*¹⁶, which is supported by contributions from Canada's private broadcasters, the Canadian music industry, and the Government of Canada through the Department of Canadian Heritage's Canada Music Fund. Such a model could provide a stable and sustainable funding structure for public-interest participation in CRTC proceedings.

299. The FRPC noted that *FACTOR*, established in the early 1980s, is funded by private broadcasters, artists, and the federal government to support the production of Canadian audio programming.

300. On November 9, 2023, the Government of Canada directed the CRTC to "*consider the need for sustainable and predictable funding to support participation by persons, groups of persons or organizations representing the public interest in proceedings before the Commission under the Act.*"¹⁷

301. DWCC agrees that *FACTOR* represents an ideal model to support public interest participation. However, it cautions that government funding should generally be avoided, as reliance on it could undermine the fund's long-term sustainability and independence due to changing political priorities. Public funds may serve as a last resort if other sources are insufficient, as exemplified by Canadian Heritage's \$650,000 contribution to the BPF-FPR when the fund was nearing depletion.

ii. Ensuring Stable Funding Through Sector Contributions

302. CAMP stated that all major sectors, broadcasting, telecommunications, and large online undertakings, should make regular, mandatory contributions to support the fund,

¹⁶ [Foundation to Assist Canadian Talent on Recordings \(FACTOR\)](#)

¹⁷ [Order Issuing Directions to the CRTC \(Sustainable and Equitable Broadcasting Regulatory Framework\): SOR/2023-239](#)

structured to provide stable and predictable funding and avoid the uncertainty that has affected the BPF-FPR.

- 303. PIAC further recommended that annual lump-sum payments could help ensure the continued availability of funds.
- 304. The CIPPIC emphasized that the funding system be structurally sound, accessible, efficient, and financially sustainable. CIPPIC noted that a pooled fund would provide greater stability and help insulate public interest participants from financial uncertainty and cost challenges from industry players.
- 305. CAMP submits that this approach would “*create a sustainable, equitable funding stream capable of supporting meaningful, diverse participation over the long term.*”
- 306. DWCC agrees, emphasizing that public interest participants must have confidence in the stability and availability of funding to ensure diverse perspectives are not excluded.

iii. Who Should Contribute / Eligibility

- 307. TLN and CAB point out that Canadian broadcasters are facing financial difficulties, and WildBrain has exited the market entirely. TLN adds that independently owned and ethnic-owned services face even greater challenges.
- 308. Cogeco reports that Canadian broadcasters incurred cumulative losses of over \$2 billion since 2015, with commercial radio profitability reaching an all-time low. CAB emphasizes that the industry cannot absorb additional regulatory or financial obligations.
- 309. Against this backdrop, several public interest participants have proposed approaches for funding public interest participation. QEPC suggests that all broadcasting, streaming, and telecommunications companies in the Canadian communications market make annual contributions.
- 310. The FRPC recommends that the five largest Canadian telecommunications and broadcasting groups operating in Canada be required to contribute, given their substantial operating revenues, with a small fraction of one percent of their annual revenues remitted each January 2nd to fund the CPF.
- 311. PIAC submits that only large Canadian telecommunications companies, BDUs, and streaming platforms should contribute, reflecting their significant interest in regulatory proceedings. Bell Canada and CAB propose proportional contributions based on revenue market presence, with a \$25 million annual threshold for broadcasting and online undertakings.
- 312. DWCC supports these approaches, emphasizing that contributions should reflect market influence and financial capacity, while ensuring that large telecommunications and online undertakings bear a proportionately greater share of the responsibility.

iv. Contribution Method

- 313.** Rogers proposed that, should the Commission establish an independent third-party fund for telecommunications and broadcasting, contributions to this fund could be drawn from the existing obligations through annual contributions to the National Contribution Fund. Similarly, Sirius XM Canada Inc. suggested that a portion of the 5% contribution required from foreign online streaming undertakings under [Broadcasting Regulatory Policy 2024-121](#) could instead be pooled to help finance public interest participation.
- 314.** DWCC fully opposes these recommendations, as public interest funding serves a distinct and essential function that ensures equity-seeking and consumer-focused voices can meaningfully participate in regulatory proceedings. Furthermore, it is not appropriate to allow deductions from existing obligations, as it undermines the core intent of these other mechanisms.
- 315.** Telus recommends that cost allocations be based on companies' annual reported operating revenues and the specific topic under consideration. Broadcasting revenues (from BDUs and online undertakings, respectively) would be used for broadcasting-related topics, while telecommunications revenues would be applied to telecommunications-related topics. This approach would create two contributor groups: one for telecommunications and one for broadcasting.
- 316.** CAMP, however, advocates pooling contributions from all sectors into a single fund, allowing the administrator to allocate funding based on the needs and merits of each application rather than tying it to the source of contribution. This approach, which DWCC supports, recognizes the increasing overlap of issues across telecommunications, broadcasting, and online platforms. DWCC adds that separating the two sectors would be less efficient and more administratively burdensome.
- 317.** Cogeco proposes calculating contributions using Telecom Operating Revenue, Wireless Operating Revenue, or Broadcasting Operating Revenue. CIPPIC argued that allocating a fixed percentage of a company's annual Canadian revenues is the fairest and proportional method and recommends that the Commission set this percentage at a level that ensures the fund's adequacy and stability.
- 318.** CAMP further suggests excluding very small players from contribution requirements to ensure fairness, focusing instead on dominant or large market participants with the greatest influence on proceedings. Similarly, PIAC proposes that larger companies contribute a percentage of their total revenues so that they bear a proportionately greater share of funding public interest participation.
- 319.** DWCC recommends a single pooled fund supported by telecommunications, broadcasting, and online undertakings to ensure equitable participation for all public interest participants.

v. Funding the CPF

320. Robin Jackson has proposed that each of the 15 Canadian telecom and broadcasting companies pay \$100,000 annually into the third-party fund, generating a total of \$1.5 million per year.
321. The FRPC further proposes that the CPF maintain financial stability by covering at least two years' worth of the previous year's operating budget and cost claims. The base fund would be \$1,471,215, with \$250,000 for research and development, and \$660,000 for board and staff expenses, bringing the **annual total to \$2,318,215, with an overall stability amount of \$7,143,645.**
322. The FRPC emphasized that the CPF must be able to absorb unexpected fluctuations from year to year, minimizing the risk of underfunding.
323. DWCC supports the FRPC's proposal, noting that it creates a stable and predictable funding source, streamlines the cost award application process, and reduces the administrative burden on public interest participants, while eliminating the need to respond to cost award challenges from companies.

vi. Allocate 15% for Accessibility-Related Costs

324. DWCC recommends that an additional **15% (\$347,732)** of the CPF be set aside specifically for accessibility-related costs. This allocation would ensure disability-focused groups, including DDBHH communities, can participate equitably in CRTC proceedings without financial barriers.
325. Eligible costs may include ASL, LSQ, CART, translation services, accessible document formatting, translanguaging, and other accommodations required to prepare submissions, attend hearings, or engage in consultations.
326. This targeted funding would enhance inclusivity, improve stakeholder engagement, and ensure that all voices are effectively represented.
327. Setting aside a defined portion of the fund would provide predictability and demonstrate the Commission's commitment to inclusion, in alignment with its obligations under the *Accessible Canada Act* and the broader objective of equitable public participation.
328. Including the accessibility allocation, the **combined annual total would be \$2,665,947, with a three-year stability amount of \$7,997,841.** DWCC recommends that this **15% allocation be reviewed on a biennial basis** to ensure it reflects the evolving accessibility landscape and the rising costs of inclusive practices, and inflation.

I. Conclusion

329. DWCC et. al values the opportunity to contribute to this critical review of the Commission's costs awards framework. With over a decade of active involvement in telecommunications and broadcasting proceedings, DWCC et al. know what works, and where the system falls short. Our experience and the evidence shared in this Reply point to a clear takeaway: equitable participation in regulatory processes is impossible without **funding that is accessible, predictable, and adequate**. Without that foundation, commitments under the *Accessible Canada Act* and the *2023 Policy Direction* remain goals, not guarantees.
330. The current costs process, marked by adversarial challenges, long reimbursement delays, and heavy administrative demands disadvantage smaller and equity-seeking public-interest participants. DWCC et al. support a unified, independent funding model such as the CPF, to ensure a fairer, faster, and more transparent system.
331. Accessibility must be built into the CPF's design. Supports like ASL/LSQ interpretation, Deaf-Blind intervenor services, and translanguaging must be recognized as essential and automatically reimbursable. Cost application forms should be updated to include a dedicated Accessibility section to capture and tabulate these efforts.
332. DWCC et al.'s *Ten Years of Advocacy and Accessibility in Action* report, demonstrate how Deaf-led participation has driven national accessibility outcomes, from the 2019 Policy Direction on Accessibility to improvements in Video Relay Services (VRS) and wireless accessibility, and share experiences by bringing lived experience to the forefront. Continued participation from organizations like DWCC et al. depends on modernizing a funding system that is no longer fit for purpose.
333. DWCC et al. urges the Commission to adopt an accessibility-centred funding model that reflects Canada's legal and moral commitments, values equity and transparency, and respects the real costs of inclusive engagement. Doing so will remove barriers, strengthen public participation, and ensure that DDBHH Canadians are recognized as equal contributors to Canada's accessible communications future.

J. Accessibility Sovereignty

334. DWCC et al. submit that equitable participation in the Commission's processes requires recognizing accessibility as a sovereign principle within Canada's digital and communications systems. Accessibility Sovereignty ensures that DDBHH Canadians have both access and agency over the technologies, policies, and data that shape their communication rights.
335. This principle extends the Government's broader commitments to digital, cultural, and informational sovereignty, positioning accessibility not as an afterthought or mere accommodation, but a core pillar of national governance and accountability.

336. By embedding Accessibility Sovereignty within the modernized funding framework, the Commission would reinforce Canada’s leadership in inclusive policy development, uphold the intent of the *Accessible Canada Act* and the *2023 Policy Direction*, and ensure that accessibility and accountability advance together.

Respectfully submitted,

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

Terri Nolt, Chair
Deaf-Blind Planning Committee (DBPC)

Megan McHugh, President
Canadian National Society
of the Deaf-Blind (CNSDB)

Appendix A

Accessibility Retainer

337. To address these persistent gaps, DWCC et al. propose the establishment of a **monthly living accessibility retainer**, a modest, predictable form of ongoing support provided to individuals and organizations engaged in accessibility-related participation and coordination. The “monthly” component signifies continuity and regularity, recognizing that accessibility work is sustained over time rather than episodic. The

“living” component reflects that such funding is intended to cover essential living and operational expenses directly tied to accessibility engagement, not discretionary compensation.

338. Modelled after a professional consulting retainer, the purpose-specific accessibility retainer ensures that accessibility professionals, consultants, and community representatives remain available to contribute their expertise, maintain readiness, and fulfill accessibility obligations across multiple CRTC proceedings. It ensures that accessibility professionals, consultants, and community representatives are consistently available to contribute their expertise, maintain readiness, and fulfill accessibility obligations across multiple proceedings or initiatives.
339. Per diem or project-based models fail to capture this ongoing commitment. They often leave consultants covering costs upfront, waiting months for reimbursement, going into debt with credit card bills, and without income during work for filings. Unlike per diem or project-based reimbursements that apply only to discrete deliverables, a retainer acknowledges that accessibility engagement in each proceeding is continuous. Consultants and community experts must monitor developments, analyze filings, respond to requests for information, and advise on accessibility implications throughout extended regulatory cycles. This structure provides predictability and stability, enabling equitable, informed participation by persons with disabilities and their representative organizations.
340. Embedding a monthly accessibility retainer within the Commission’s funding framework is crucial to ensuring consistent, equitable participation by accessibility-focused organizations and individuals. Sustained and equitable involvement of accessibility-focused organizations and individuals requires ongoing support. The current episodic, one-time nature of traditional cost awards does not reflect the continuous, year-round accessibility work required to engage meaningfully in CRTC proceedings. Accessibility consultation, policy analysis, stakeholder coordination, and translanguaging support all occur between proceedings and require ongoing readiness.
341. Without a stable retainer mechanism, organizations must repeatedly rebuild their capacity, resulting in the loss of expertise, inconsistent representation, and an increased administrative burden for both applicants and the Commission. Recognizing a Monthly Accessibility Retainer as a reimbursable, standing cost category would enable sustained participation, continuity of expertise, and compliance with the **Accessible Canada Act** and the **2023 Policy Direction to the CRTC**, which together call for proactive removal of systemic barriers to full and effective participation by persons with disabilities.
342. To ensure fiscal accountability, **the final cost application submitted at the conclusion of a proceeding should deduct the total monthly retainer payments from the overall costs once the actual hours have been tabulated and verified.** This approach maintains transparency while acknowledging that the retainer serves as an advance mechanism, bridging the gap between the commencement of accessibility work

and the delayed reimbursement timeline typical of CRTC cost awards. The retainer, therefore, functions as both an equity measure and an administrative efficiency tool, reducing financial precarity for accessibility participants while maintaining accurate reconciliation of final costs.

Appendix B

*Tables of DWCC Survey Costs for
TNC 2020-178, BNC 2024-137, TNC 2024-293,
TNC 2024-294, TNC 2024-295*

WIRELESS SECTION									
Name / Item	Level of Consultant	Total Hours	Hourly Rate (CAD)	Total Cost (CAD)	Project Type	Document Type / Evidence Reference	Date Range of Work	Form Type	Notes / Rationale
Lisa Anderson	Senior Consultant	458	\$225.00	\$103,050.00	Wireless Survey + Mystery Shopper Reports	Form III	Oct 2020 – Feb 2022	Consultant Fee	Lead consultant; authored reports, interventions, RFI replies
Jeffrey Beatty	Senior Consultant / Analyst	99	\$225.00	\$22,275.00	Wireless Survey + Mystery Shopper	Form III	Sept 2020 – Feb 2022	Consultant Fee	Data visuals, charts, covers, tech reviews
Gary Malkowski	Consultant (Accessibility Policy)	4	\$225.00	\$1,017.00	Wireless Survey	Form III	2021-11	Consultant Fee	Advisory input
Eileen Edinger	Consultant (Website Research)	4	\$110.00	\$440.00	Website Research (WSP Accessibility)	Form III	Mar 2021 – Mar 2022	Consultant Fee	Research support
Brian Foran	Consultant	2	\$110.00	\$220.00	Wireless Survey	Form III	2021-03	Consultant Fee	Brief input on survey
Michael J. Stewart	Data Analyst	66	\$110.00	\$7,260.00	Wireless Survey + Mystery Shopper Data	Form III	July 2020 – Nov 2021	Analyst Fee	Data extraction and quantitative analysis
Total Hours		633							
Subtotal – Consultant & Analyst Fees				\$134,262.00					
MYSTERY SHOPPER PROJECT									
Name / Item	Level of Consultant	Total Hours	Hourly Rate (CAD)	Total Cost (CAD)	Project Type	Document Type / Evidence Reference	Date Range of Work	Form Type	Notes / Rationale
Project Coordinator #1	Mystery Shopper Coordinator			\$1,000.00	Mystery Shopper Project	001-2020-178			Oversight of participant recruitment and data tracking
Mystery Shoppers #1–30	Individual Mystery Shopper Participants			\$4,500.00	Mystery Shopper Project	002–031-2020-178			Field testing and survey feedback collection
Project Coordinator #2	Mystery Shopper Coordinator			\$1,000.00	Mystery Shopper Project	032-2020-178			Coordination of final regional testing
Deaf-Blind Coordinator Assistant	Deaf-Blind Assistant Coordinator			\$250.00	Mystery Shopper Project	033-2020-178			Support for DeafBlind participant coordination
Atlantic Regional Assistant Liaison	Atlantic Assistant Liaison			\$250.00	Mystery Shopper Project	054-2020-178			Regional liaison support
Subtotal – Mystery Shoppers				\$7,000.00					
Translations & Consultations									
Name / Item	Level of Consultant	Total Hours	Hourly Rate (CAD)	Total Cost (CAD)	Project Type	Document Type / Evidence Reference	Date Range of Work	Form Type	Notes / Rationale
Christine Roschaert	Deaf-Blind ASL–LSQ Consultant			\$150.00	Translations & Consultations	034-2020-178			
TraduSigne	ASL–LSQ Translation (SI-7110)			\$124.30	Translations & Consultations	035-2020-178	2020-07-01		
TraduSigne	ASL–LSQ Translation (SI-7124)			\$124.30	Translations & Consultations	036-2020-178	2020-08-11		
TraduSigne	ASL–LSQ Translation (SI-7165)			\$124.30	Translations & Consultations	037-2020-178	2020-10-10		
Rachel Filion	French Translation (April – Nov 2020)			\$700.00	Translations & Consultations	038-2020-178	April–Nov 2020		Survey letters and templates
Great Lakes Interpreting Services (GLIS)	ASL, LSQ & Video Editing			\$7,910.00	Translations & Consultations	039-2020-178			Multiple interpreters and editors paid separately
TraduSigne	ASL–LSQ Translation (SI-7187)			\$124.30	Translations & Consultations	042-2020-178	2020-10-26		
TraduSigne	ASL–LSQ Translation (SI-7242)			\$135.60	Translations & Consultations	043-2020-178	2020-12-28		
TraduSigne	ASL–LSQ Translation (Facebook Live, SI-8076)			\$135.60	Translations & Consultations	044-2020-178	2021-04-19		
Rachel Filion	French Translations (Dec 2020 – Apr 2021)			\$300.00	Translations & Consultations	055-2020-178	Dec 2020 – Apr 2021		Further French translation work
Subtotal – Translations & Consultations				\$9,828.40					
Survey Work or Report Work									

Name / Item	Level of Consultant	Total Hours	Hourly Rate (CAD)	Total Cost (CAD)	Project Type	Document Type / Evidence Reference	Date Range of Work	Form Type	Notes / Rationale
Lisa Anderson	Survey Monkey 2020 Expense			\$408.00	Survey or Report Work	000-2020-178			Online survey platform licence
Darryl Hackett	Prizes for Survey – Samsung Smartphone			\$849.19	Survey or Report Work	040-2020-178			Incentive for survey participants
Darryl Hackett	Prizes for Survey – Apple iPhone 11 Black			\$1,185.37	Survey or Report Work	041-2020-178			Second survey incentive
Darryl Hackett	Survey Monkey 2021 & Prize #3			\$2,043.03	Survey or Report Work	044-2020-178			Platform renewal and third prize
Jessica Sergeant	Quantitative Analysis into Infographics			\$3,575.00	Survey or Report Work	050-2020-178			Data visualization and reporting for Mystery Shopper and Wireless
Nancy Zavaglia	Photography & Models			\$550.00	Survey or Report Work	051-2020-178			Photography for reports and social use
Eileen Edinger	Website Research & Writing (WSP Accessibility)			\$600.00	Survey or Report Work	053-2020-178			Research on website accessibility
Lindsay Carroll	Word Clouds – Qualitative Analysis			\$500.00	Survey or Report Work	056-2020-178			Textual data visualization
Subtotal – Survey or Report Work				\$9,810.59					
Total Hours:		633							
Total Consultant & Analyst Fees:				\$134,262.00					
Total Disbursements:				\$26,638.99					
Grand Total:				\$160,900.99					

Name / Item for TNC CRTC 2024-137	Level of Consultant	Total Hours	Hourly Rate	Total Cost (CAD)	Project Type	Document Type / Evidence Reference	Date Range of Work	Form Type	Funding Source	Notes / Rationale
Jeffrey Beatty	Senior Consultant (Regulatory Lead)	200	\$225.00	\$45,000.00	Broadcasting Consultation	Schedule C (Form BPF) * Timesheet	Aug – Feb 2025	Consultant Fee	DWCC	Lead consultant: oversaw survey design, reply comments, procedural letters, and data analysis
James Roots	Senior Consultant (Policy & Research)	21	\$225.00	\$4,725.00	Broadcasting Consultation	Schedule C (Form BPF)	Oct – Dec 2024	Consultant Fee	DWCC	Drafted policy sections and edited survey interpretation and intervention documents
Megan McHugh	Intermediate Consultant (Deaf-Blind Accessibility)	25	\$165.00	\$4,125.00	Broadcasting Consultation	Schedule C (Form BPF) * Timesheet	Aug 2024 – Feb 2025	Consultant Fee	DWCC	Drafted procedural letters, reviewed interventions, and edited Deaf-Blind terminology
Louis Belleau	Junior Consultant (French / LSQ Translation)	20	\$110.00	\$2,200.00	Broadcasting Consultation	Schedule C (Form BPF) * Timesheet	Oct – Dec 2024	Consultant Fee	DWCC	Translated and reviewed LSQ survey content and French interventions
Rachel Fillon	Junior Consultant (French Translation)	13	\$110.00	\$1,430.00	Broadcasting Consultation	Schedule C (Form BPF) * Timesheet	Oct – Nov 2024	Consultant Fee	DWCC	Translated survey and emails into French for Québec partners
Terri Nolt	Junior Consultant (Procedural and Editing)	15	\$110.00	\$1,650.00	Broadcasting Consultation	Schedule C (Form BPF) * Timesheet	Aug 2024 – Feb 2025	Consultant Fee	DWCC	Reviewed procedural letters and draft documents for accuracy
Michael J. Stewart	Intermediate Analyst (Data Analysis)	21	\$165.00	\$3,465.00	Broadcasting Consultation	Schedule C (Form BPF) * Timesheet	Nov 2024	Analyst Fee	DWCC	Survey data processing and quantitative analysis for report
Jessica Sergeant	Junior Analyst (Infographics & Reporting)	78	\$110.00	\$8,580.00	Broadcasting Consultation	Schedule C (Form BPF) * Timesheet	Oct – Dec 2024	Analyst Fee	DWCC	Designed infographics and co-authored survey report and cost application
Subtotal – Consultant & Analyst Fees										
				\$71,175.00						
Zoom Canada Pro Account	Online consultation hosting (6 months)			\$180.00	Disbursement	Schedule D (Invoice D-001-2024-137)	2024–2025	Invoice	DWCC	Video meetings for team and CRTC coordinations
Canva Pro	Infographic and poster design license			\$190.00	Disbursement	Schedule D (Invoice D-002-2024-137)	2024–2025	Invoice	DWCC	Visual design software for reports and graphics
Adobe Acrobat Pro	PDF editing and report layout			\$210.00	Disbursement	Schedule D (Invoice D-003-2024-137)	2024–2025	Invoice	DWCC	Document preparation and accessibility formatting
Descript Inc.	Caption editing and video transcription			\$125.00	Disbursement	Schedule D (Invoice D-004-2024-137)	2024–2025	Invoice	DWCC	Used to caption DWCC's video submissions
Google Workspace	Cloud storage and shared document hosting			\$168.00	Disbursement	Schedule D (Invoice D-005-2024-137)	2024–2025	Invoice	DWCC	Team collaboration and archival
Infographics (Contract – Jessica Sergeant)	Visual summary development			\$875.00	Disbursement	Schedule D (Invoice D-006-2024-137)	2024–2025	Invoice	DWCC	Infographic graphics for public report
Translation (LSQ / French – Louis Belleau and Rachel Fillon)	Professional translations of interventions			\$650.00	Disbursement	Schedule D (Invoice D-007-2024-137)	2024–2025	Invoice	DWCC	Two contracts combined
Accessibility Review (Eileen Edinger)	ASI and caption content check			\$375.00	Disbursement	Schedule D (Invoice D-008-2024-137)	2024–2025	Invoice	DWCC	Reviewed accessibility of submitted videos
Website Hosting & Domain Renewal	DWCC.ca updates & backup			\$290.00	Disbursement	Schedule D (Invoice D-009-2024-137)	2024–2025	Invoice	DWCC	Maintaining public CRTC submission access
Subtotal – Disbursements and Invoices				\$3,063.00						
Grand Total				\$74,238.00						

TNC CRTC 2024-293									
Name / Item for TNC CRTC 2024-293	Level of Consultant / Analyst	Total Hours	Hourly Rate (CA Total Cost (CAD))	Project Type	Document Type / Evidence Reference	Date Range of Work	Form Type	Funding Source	Notes / Rationale
TNC CRTC 2024-293 — Jeffrey Beatty	Senior Consultant	76	\$225.00	Consultant Fees	Form V; Form III	Nov 23, 2024 – Mar 2025	Form III	CRTC Costs	Per Form V; levels per Participants
TNC CRTC 2024-293 — Lisa Anderson	Senior Consultant	70	\$225.00	Consultant Fees	Form V; Form III	Nov 23, 2024 – Mar 2025	Form III	CRTC Costs	Per Form V; levels per Participants
TNC CRTC 2024-293 — Gary Malkowski	Senior Consultant	21	\$225.00	Consultant Fees	Form III	Jan-Feb 2025	Form III	CRTC Costs	Per Form III
TNC CRTC 2024-293 — Jessica Sergeant	Junior Analyst	121	\$110.00	Analyst Fees	Form III	Dec 2024 – Mar 2025	Form III	CRTC Costs	Per Form III
TNC CRTC 2024-293 — Michael J. Stewart	Intermediate Analyst	23	\$165.00	Analyst Fees	Form III	Feb 2-6, 2025	Form III	CRTC Costs	Per Form III
TNC CRTC 2024-293 — Disbursements (none claimed)	—	0	\$0.00	Disbursement	Form V		Form V	CRTC Costs	Total disbursements \$0.00 per Form V
SUBTOTAL — Total Hours / Fees / Disbursements		311							Total Disbursements: \$0.00
TNC CRTC 2024-294									
Name / Item for TNC CRTC 2024-294	Level of Consultant / Analyst	Total Hours	Hourly Rate (CA Total Cost (CAD))	Project Type	Document Type / Evidence Reference	Date Range of Work	Form Type	Funding Source	Notes / Rationale
TNC CRTC 2024-294 — Lisa Anderson	Senior Consultant	53	\$225.00	Consultant Fees	Form III (Apr 13, 2025)	Dec 2024 – Mar 2025	Form III	CRTC Costs	
TNC CRTC 2024-294 — Jeffrey Beatty	Senior Consultant	31	\$225.00	Consultant Fees	Form III	Dec 2024 – Mar 2025	Form III	CRTC Costs	
TNC CRTC 2024-294 — Rachel Filion	Consultant (French Translation)	9	\$110.00	Consultant Fees	Form III	Mar 2025	Form III	CRTC Costs	
TNC CRTC 2024-294 — Jessica Sergeant	Junior Analyst	73	\$110.00	Analyst Fees	Form III	Dec 2024 – Apr 2025	Form III	CRTC Costs	
TNC CRTC 2024-294 — CB Linguistic Services	—	0	\$0.00	Disbursement	Schedule D (INV-1275)		Schedule D	CRTC Costs	Translation services
TNC CRTC 2024-294 — TraduSigne	—	0	\$0.00	Disbursement	Schedule D (DEVIS1137)		Schedule D	CRTC Costs	LSQ translation
TNC CRTC 2024-294 — Eversa INC.	—	0	\$0.00	Disbursement	Schedule D (INV-1345)		Schedule D	CRTC Costs	Captioning / media production
SUBTOTAL — Total Hours / Fees / Disbursements		166							Total Disbursements: \$3,224.12
TNC CRTC 2024-295									
Name / Item for TNC CRTC 2024-295	Level of Consultant / Analyst	Total Hours	Hourly Rate (CA Total Cost (CAD))	Project Type	Document Type / Evidence Reference	Date Range of Work	Form Type	Funding Source	Notes / Rationale
TNC CRTC 2024-295 — Lisa Anderson	Senior Consultant	34	\$225.00	Consultant Fees	Form III; Form V	Apr 2025	Form III	CRTC Costs	
TNC CRTC 2024-295 — Jeffrey Beatty	Senior Consultant	31	\$225.00	Consultant Fees	Form III; Form V	Apr 2025	Form III	CRTC Costs	
TNC CRTC 2024-295 — Jessica Sergeant	Junior Analyst	42	\$110.00	Analyst Fees	Form III; Form V	Apr 2025	Form III	CRTC Costs	
TNC CRTC 2024-295 — Disbursements (none claimed)	—	0	\$0.00	Disbursement	Form V		Form V	CRTC Costs	Total disbursements \$0.00 per Form V
SUBTOTAL — Total Hours / Fees / Disbursements		107							Total Disbursements: \$0.00
GRAND TOTAL — All Proceedings		584							Total Disbursements: \$3,224.12 GRAND TOTAL (Fees+Disb): \$107,319.12
Total Consultant Hours & Analyst Fees:		107		All Project Phases	Form V – Summary of Fees and Disbursements	Dec 2024 – Apr 2025	Form V / Schedule C	CRTC Telecom Costs	Certified April 13 2025 by Jeffrey Beatty (Chairperson).
Total Disbursements:			\$0.00	N/A	Form IV – Affidavit of Disbursements	—	Schedule D	CRTC Telecom Costs	No disbursements claimed for this proceeding.
Grand Total			\$19,245.00	All Phases	Certified Form V – April 13 2025 Submission	Dec 2024 – Apr 2025	Form V / Schedule E	CRTC Telecom Costs	Represents all necessary and reasonable costs incurred for TNC 2024-295.

Appendix C: Comparative Report

Comparative Report: Consultant Hours, Disbursements and Observations (2020–2025) By Crystal Jones, Junior Consultant

Executive Summary

From 2020 to 2025, the Deaf Wireless Canada Committee (DWCC) transformed how Deaf-led organizations engage with national regulators. What began as large, community-based accessibility research evolved into a streamlined, digital approach to policy development and cost recovery. Over five major CRTC proceedings, DWCC recorded more than 1,600 consultant hours, with total professional fees of \$309,532 and disbursements of \$32,926 across a combined period of 31 months.

This five-year progression reflects more than improved numbers. Disbursement costs dropped by nearly ninety percent as projects became faster, more coordinated, and more transparent. The Committee strengthened its governance systems, modernized its workflows, and expanded its influence in accessibility policymaking. Through this shift, DWCC demonstrated how a Deaf-led organization can balance fiscal responsibility with meaningful public impact, setting a national example for accountability and accessibility leadership within Canada's regulatory landscape.

1. Overview

This report presents a comparative analysis of consultant hours, disbursements, and procedural performance across five CRTC proceedings conducted by DWCC between 2020 and 2025. The purpose is to evaluate trends in cost efficiency, accessibility outcomes, and governance maturity to strengthen future project planning and reporting.

The analysis draws on verified consultant documentation and CRTC compliance guidelines to ensure transparency and reliability. It highlights DWCC's progression from field-based

community research to streamlined, digital regulatory submissions aligned with national accessibility objectives.

2. Methodology

The analysis drew on multiple verified data sources, including Forms III, IV, and V cost applications, consultant invoices, disbursement receipts, project timesheets, version history logs, and relevant CRTC Cost Orders. All expenditures and professional service claims were reviewed for necessity, reasonableness, and direct relevance to the preparation of interventions, research reports, and accessibility deliverables.

Each record was cross-verified against financial documentation and archival evidence to ensure consistency, traceability, and compliance with Telecom Information Bulletin 2016-188. This approach provided a reliable foundation for assessing cost efficiency, procedural integrity, and comparative outcomes across all five proceedings.

3. TNC 2020-178 – Wireless Accessibility & Mystery Shopper Surveys (January 2020 – April 2021)

Scope and Activities – Consultant Summary

This project represented DWCC's first large-scale national study on wireless accessibility for Deaf, DeafBlind, and hard of hearing Canadians. Consultants led survey design, data validation, and cross-analysis of wireless service accessibility. Senior consultants coordinated report authorship and policy framing, while analysts conducted technical research, measured compliance indicators, and examined user experiences. The collaboration brought together community-driven insight and professional analysis to produce a reliable evidence base for federal accessibility policy.

Consultant Summary Table

Role	Total Hours	Fees (CAD)	Notes
Senior Consultants (Anderson, Beatty, Malkowski)	582	\$123,067	Report authorship, coordination, and data review
Analysts & Researchers (Stewart, Edinger, Foran)	51	\$11,195	Quantitative and website accessibility research
Total	633	\$134,262	

Scope and Activities – Disbursement Summary

Disbursement activities focused on accessibility and participant inclusion. Mystery shopper honoraria supported equitable involvement across provinces, while translation and interpretation ensured ASL, LSQ, French, and DeafBlind access. Additional expenses covered survey software, prizes to encourage participation, and infographic design for public dissemination. These costs, though high compared with later years, directly supported accessibility equity and established a benchmark for transparent, inclusive research spending.

Disbursements Summary Table

Category	Amount (CAD)	Description
Mystery Shopper Payments	\$7,000	Honoraria for 30 testers and regional coordinators
Translation & Interpretation	\$9,828	ASL-LSQ, French, Deaf-Blind translation
Survey Platforms & Prizes	\$9,811	SurveyMonkey, incentive devices, infographic design
Total	\$26,639	

Observations

This project was a major milestone in Deaf-led accessibility research. The national survey and mystery shopper program provided first-hand information on how Deaf, DeafBlind, and hard of hearing consumers experience wireless services. Translation and interpretation costs were higher than in later years, but they were essential to ensuring equal participation across all language groups. The project built strong teamwork between consultants, analysts, and regional participants, resulting in reliable, community-based data.

Public Interest and Accessibility Impact

Findings from this study contributed directly to CRTC Decision 2021-281, which improved oversight of wireless accessibility standards. It was also the first time Deaf Canadians influenced federal telecommunications policy through visual-language data collection. The project helped regulators understand barriers from a Deaf perspective and emphasized the importance of involving the community in future accessibility work.

Outcome

DWCC established a dependable model for conducting large-scale, inclusive research. The project strengthened its position as a credible organization able to combine community experience with regulatory expectations.

4. TNC 2024-137 – Broadcasting Accessibility Consultation (November 2023 – May 2024)

Scope and Activities – Consultant Summary

Consultants in this proceeding examined national broadcasting policies and accessibility obligations, with a focus on captioning, ASL and LSQ integration, and equitable on-screen representation. Senior consultants developed regulatory briefs and drafted policy submissions, while junior and intermediate members created visual materials, edited procedural text, and managed translation accuracy. The collective work combined policy expertise with accessible communication design to ensure Deaf and DeafBlind voices were embedded in every stage of consultation.

Consultant Summary Table

Role	Total Hours	Fees (CAD)	Notes
Senior Consultants (Beatty, Roots, McHugh)	236	\$51,805	Policy drafting, regulatory interpretation, accessibility strategy
Intermediate & Junior Consultants (Sergeant, Stewart, Filion, Belleau, Nolt)	147	\$19,370	Infographics, translation, procedural edits
Total	383	\$71,175	

Scope and Activities – Disbursement Summary

Disbursements in this proceeding supported digital production and accessibility presentation. Modest expenses covered essential software subscriptions, translation of key materials into LSQ and French, caption editing, and infographic development for public engagement. These investments maintained full accessibility while demonstrating efficient resource use through digital-first collaboration.

Disbursements Summary Table

Category	Amount (CAD)	Description
Software Subscriptions	\$1,023	Zoom, Canva, Adobe, Google Workspace
Accessibility & Translation	\$1,400	LSQ/French translation and caption editing
Infographics & Hosting	\$640	Visual summaries, DWCC.ca maintenance
Total	\$3,063	

Observations

This consultation used a digital approach that improved coordination and reduced costs. Team members collaborated through shared online platforms, which shortened editing time and reduced errors. The consultant team balanced policy analysis with accessibility design, preparing infographics and captioned summaries that made the material easier to understand for Deaf and DeafBlind audiences.

Public Interest and Accessibility Impact

The proceeding helped strengthen communication between broadcasters, regulators, and accessibility groups. By providing captioned and signed materials, DWCC made the consultation process more inclusive and encouraged greater participation. The work also raised awareness of accessibility responsibilities within broadcasting, influencing how information is presented to the public.

Outcome

DWCC demonstrated how digital collaboration can produce high-quality results with lower costs. The consultation improved policy awareness and confirmed DWCC's role as a reliable contributor to accessibility and broadcasting discussions.

**5. TNC 2024-293, 2024-294, and 2024-295 – Telecommunications Cost Proceedings
(November 2024 – April 2025)**

Scope and Activities – Consultant & Disbursements Summary

For these three interconnected cost proceedings, DWCC’s consultant team concentrated on procedural compliance, cost recovery, and overall regulatory efficiency. Senior analysts prepared and reviewed cost claims, verified hourly documentation, and ensured each filing met the standards set out in the CRTC’s cost-assessment framework. With a stable and experienced team in place, the proceedings were completed with strong continuity, reduced turnaround time, and clear consistency across all submissions. Disbursement spending remained minimal, as translation, formatting, and document production were handled internally. This combined approach demonstrated DWCC’s capacity to manage accessibility work independently, reinforcing both long-term sustainability and responsible financial oversight, accountability, and measurable improvements in cost management and internal oversight.

Consultant/Disbursement Summary Table

Proceeding	Total Hours	Fees (CAD)	Disbursements (CAD)
2024-293	311	\$54,680	\$0
2024-294	166	\$30,170	\$3,224
2024-295	107	\$19,245	\$0
Total	584	\$104,095	\$3,224

Observations

These combined cost proceedings showed significant improvement in project management and consistency. A stable consultant team allowed work to move quickly and with fewer revisions. Documentation, translation, and formatting were handled internally, reducing outside costs and

improving quality control. Overall, the process reflected a high level of organization and accountability.

Public Interest and Accessibility Impact

The proceedings supported fair cost recovery for accessibility organizations that participate in regulatory processes. They demonstrated that Deaf-led organizations can efficiently meet federal compliance standards while effectively representing community interests. This model promotes broader participation from groups that may face barriers in policy involvement.

Outcome

DWCC achieved strong financial control and dependable procedural results. These proceedings demonstrated sustainable governance and provided a framework for future filings that strike a balance between accessibility goals and responsible spending.

6. Comparative Summary

The table below provides a summary of consultant hours, fees, disbursements, and key project details from DWCC's five proceedings between 2020 and 2025. The comparison shows how the organization's work evolved from large, community-based research studies to smaller, digitally coordinated policy filings. It also highlights a steady decline in overall costs, shorter project durations, and greater use of internal expertise, all of which reflect DWCC's growing organizational maturity and efficiency.

Metric	2020–178	2024–137	2024–293–295	Totals
Total Hours	633	383	584	1,600
Consultant Fees (CAD)	\$134,262	\$71,175	\$104,095	\$309,532
Disbursements (CAD)	\$26,639	\$3,063	\$3,224	\$32,926
Duration	16 mo	6 mo	5 mo	-
Team Size	10+ consultants, 30 testers	8 consultants	5 recurring	-
Avg Cost/Hour	\$212	\$186	\$178	\$193 avg
Accessibility Deliverables	Surveys, vlogs, and national data	Captioned materials, infographics	Cost filings, bilingual forms	-
Cost Efficiency Trend	High outreach cost	Digital optimization	Full internal integration	-

Interpretation

The data indicate evident progress in how DWCC managed its projects and resources over the five years. Consultant hours varied depending on the scope of each proceeding, with the earliest study in 2020 involving extensive fieldwork and national coordination, and later projects requiring more focused and specialized work. As DWCC refined its internal systems, project timelines shortened, and operational costs decreased. Disbursements decreased from more than \$26,000 in 2020 to just over \$3,000 in 2025, reflecting the shift toward digital workflows and in-house production. Smaller consultant teams delivered efficient results, maintaining quality while reducing their reliance on external resources. Accessibility outputs also became more structured, transitioning from extensive survey-based studies to bilingual policy submissions that were designed for clarity and consistency. Overall, the data reflect DWCC’s steady progress toward a stronger organization, cost control, and leadership in accessibility-focused regulatory work.

7. Key Trends and Strategic Insights

1. Governance and Compliance

DWCC's filings continue to align with the Guidelines for the Assessment of Costs outlined in Telecom Information Bulletin 2016-188. The use of consistent recordkeeping, standardized forms, and carefully cross-referenced schedules demonstrates strong procedural transparency and apparent readiness for audit review. This structure reflects an organization that values accountability and ensures each submission meets national regulatory expectations.

2. Public Interest and Accessibility Outcomes

DWCC's work has broadened national awareness of accessibility challenges in telecommunications and broadcasting policy. By maintaining consistent participation in regulatory proceedings, the Committee has strengthened the presence of Deaf and DeafBlind Canadians in policy discussions. These efforts have advanced equitable representation and established DWCC as a trusted contributor to accessibility decision-making in Canada.

3. Operational Efficiency

Efficiency improved steadily over the five-year period. Disbursement ratios declined from nearly 20 percent in 2020 to below 3 percent in 2025. The use of cloud collaboration, in-house bilingual translation, and digital workflows reduced duplication, minimized delays, and accelerated approval processes. These measures demonstrate how digital tools can improve both cost control and productivity without compromising quality.

4. Transparency and Record Management

DWCC maintains a detailed archival system in which consultant timesheets, invoices, and project materials are stored, along with metadata tagging for long-term traceability. This structure provides clear documentation of financial activity, strengthens audit consistency, and supports ongoing transparency across all proceedings.

5. Knowledge Translation and Dissemination

The Committee produced more than ten American Sign Language (ASL) and Langue des Signes Québécoise (LSQ) vlogs, three captioned summary videos, and six infographic sets hosted on DWCC.ca. Materials were distributed across Facebook, YouTube, and in accessible PDF formats to ensure equal access to information. This commitment to sharing knowledge in multiple accessible formats reinforces DWCC's leadership in making policy information available and understandable to the wider Deaf and accessibility communities.

8. Recommendations (2026–2028)

Over the next few years, DWCC can continue to grow by enhancing its operational efficiency, fostering stronger partnerships, and effectively communicating its work. The organization can benefit from creating clear templates for accessibility reports and using the same formats for timesheets and translation records. Setting up an easy-to-read dashboard also helps track project timelines and overall progress.

Stronger partnerships with DeafBlind, Indigenous, and Francophone communities will help ensure that future projects reflect a wider range of experiences and perspectives. Working together with other accessibility organizations can also create a united approach to national advocacy, where knowledge and resources are shared for greater impact.

In the longer term, DWCC can continue to show leadership by being transparent about its results and sharing what it learns from each project. Regular reports, community updates, and accessible public materials can help build trust and foster a deeper understanding between policymakers and the communities DWCC represents. By maintaining this open and accountable approach, DWCC will continue to be a strong and respected voice for accessibility in Canada.

9. Conclusion

From 2020 to 2025, DWCC's work grew from large national research projects into a well-organized, digital approach to accessibility advocacy. The organization's filings now reflect strong governance, lower costs, faster completion times, and consistent innovation in Deaf-led policy work. Through this growth, DWCC has become a reliable model of accountability and accessibility leadership in Canada's telecommunications and broadcasting sectors.

Looking ahead to 2026–2028, DWCC plans to build on this foundation by expanding collaboration with Deaf-led organizations across the country. Future projects will explore new ways to use real-time ASL and LSQ data visualization, predictive analysis, and shared digital tools that strengthen communication and policy engagement. By continuing to combine technology, transparency, and community knowledge, DWCC will help ensure accessibility remains an essential part of Canada's digital policy landscape.

Appendix D

Document Counts & Time Waits

Tables of DWCC Historical Document Counts

DWCC Document Count 2015-2025		
Request for hearing accessibility	11	
Procedural Requests	51	
Interventions	38	
Reply to Interventions	25	
Supplementary/Infographics	20	
Evidence/Reports/Petitions	24	
Notes for Handout at hearing	9	
Powerpoint presentation	8	
Undertakings	4	
RFI Reply / Further Comments	34	
Final Reply	18	
Cost Application docs	76	
+ Review and Vary	2	
TOTAL	320	
*includes 2021-102 Review and Vary and stops at 2025-48, 2025-2, 2025-20		
Categories		
Interventions		84
First Intervention	38	
Supplementary/Infographics	20	
Evidence/Reports/Petitions	24	
Review and Vary	2	
Replies		77
Reply to Interventions	25	
RFI Reply / Further Comments	34	
Final Reply	18	
Hearing		32
Request for hearing accessibility	11	
Notes for Handout at hearing	9	
Powerpoint presentation	8	
Undertakings	4	
Regulatory		127
Procedural Requests	51	
Cost Application docs	76	
TOTAL	318	320
Minus 71 Cost Applications	74	74

Date tracking - Time Between & Wait Periods									
Proceeding #	Date	TRP or TD Date	Time between public proceeding open & Policy or Decision release	CRTC Policy Decision	Cost Application Submission Date	Cost Application Final RFI Response Date (to CRTC or telecoms)	Cost Order #	Cost Decision	Time btwn Cost Applo/ RFI & Cost Decision
1 TNC 2015-134	April 11, 2016	December 21, 2016	8 months	TRP 2016-486	July 11, 2016	January 20, 2017	TRO 2017-137	May 5, 2017	Applic: 10 months RFI: 5 months
2 TNC 2016-116	March 29, 2016	June 1, 2017	14 months	TRP 2017-182	March 3, 2017	July 5, 2017	TRO 2018-66	February 16, 2018	Applic: 11 months RFI: 7 months
3 TNC 2016-293	July 28, 2016	June 15, 2017	11 months	TRP 2017-200	April 12, 2017	June 30, 2017	TRO 2017-380	October 25, 2017	Applic: 11 months RFI: 7 months
4 TNC 2017-33	February 2, 2017	December 14, 2018	18 months	TRP 2018-466	December 7, 2017	March 8, 2018	TRO 2018-437	November 28, 2018	Applic: 12 months RFI: 9 months
5 TNC 2018-98	March 22, 2018	December 17, 2018	23 months	TD 2018-475	November 9, 2018	January 17, 2019	TRO 2019-164	May 21, 2019	Applic: 6 months RFI: 4 months
6 TNC 2018-246	July 16, 2018	April 3, 2020	21 months	Report	December 14, 2018	January 17, 2019	TRO 2019-336	September 25, 2019	Applic: 9 months RFI: 8 months
7 TNC 2018-422	November 9, 2018	July 31, 2019	9 months	TNC 2019-269	June 24, 2019	December 12, 2019	TRO 2019-415	December 12, 2019	6 months
8 TNC 2020-178	June 1, 2020	February 23, 2023	33 months	TRP 2023-41	April 8, 2022	June 1, 2022	TRO 2023-57	March 9, 2023	Applic: 11 months RFI: 9 months
9 BTNC 2020-81	March 3, 2020	February 10, 2022	23 months	TBNC 2022-28	August 21, 2020	N/A	TRO 2022-36	February 17, 2022	18 months
10 TBNC 2020-124	April 14, 2020	May 5, 2022	25 months	TBIB 2022-117	July 20, 2020	N/A	TRO 2021-174	May 13, 2021	10 months
11 TNC 2020-326	Sept 4, 2020	June 14, 2021	9 months	TRD 2021-199	December 4, 2020	N/A	TRO 2021-220	July 9, 2021	7 months
12 TBNC 2021-69	February 16, 2021	August 23, 2022	18 months	TBIB CRTC 2022-227	April 30, 2021	N/A	TRO 2021-355	October 29, 2021	5 months
13 TNC 2021-102	March 11, 2021	February 21, 2025	48 months	TRP 2025-54	December 4, 2023	March 15, 2024	TRO 2025-97	May 14, 2025	Applic: 18 months RFI: 14 months
14 TBNC 2021-191	June 3, 2021	August 31, 2022	15 months	TRP 2022-234	April 15, 2022	N/A	TRO 2022-306	November 7, 2022	7 months
15 TNC 2022-65	March 8, 2022	February 28, 2025	N/A	No Policy or Decision	August 1, 2022	N/A	TRO 2023-371	November 17, 2023	16 months
16 TNC 2023-39	February 22, 2023	No Policy or Decision?	N/A	No Policy or Decision	February 2, 2024	N/A	TRO 2024-305	November 27, 2024	10 months
17 BNC 2024-137	June 25, 2024	Too early for Policy Decision	N/A	Too early for Policy Decision	March 7, 2025	N/A	BPF 2024-137 (Chair) via email	April 30, 2025	2 months
18 BNC 2024-288	November 15, 2024	Too early for Policy Decision	N/A	Too early for Policy Decision	July 23, 2025	N/A	BPF 2025-288 (Chair) via email	Decision not yet released	
19 TNC 2024-293	November 22, 2024	Too early for Policy Decision	N/A	Too early for Policy Decision	April 13, 2025	N/A		Decision not yet released	
20 TNC 2024-294	November 22, 2024	Too early for Policy Decision	N/A	Too early for Policy Decision	April 13, 2025 & June 27, 2025	N/A		Decision not yet released	
21 TNC 2024-295	November 22, 2024	Too early for Policy Decision	N/A	Too early for Policy Decision	April 13, 2025	N/A		Decision not yet released	
22 TNC 2024-318	December 4, 2024	Proceeding still ongoing, policy will come after it closes.	N/A	Too early for Policy Decision	October 5, 2025	N/A		Decision not yet released	
23 BNC 2025-2	January 9, 2025	Proceeding still ongoing, policy will come after it closes.	N/A	Too early for Policy Decision	September 17, 2025	N/A	BPF 2025-2 (Chair) via email	October 22, 2025	1 month
24 TNC 2025-20	January 27, 2025	Too early for Policy Decision	N/A	Too early for Policy Decision	May 12, 2025	N/A	2025-216	Decision not yet released	3 months
25 BNC 2025-48	February 18, 2025	June 12, 2025	Four months	Broadcasting Decision CRTC 2025-140	April 18, 2025	N/A	BPF 2025-48 (Chair) via email	May 18, 2025	1 month
TOTALS = 25*									
*Note: Removed review and verays, and proceedings with no cost applications									
<div> <div>LEGEND</div> <div> <div>Proceeding Count</div> <div>Major proceeding - Survey Reports</div> <div>Marks "Still in waiting"</div> <div>No Policy decision, Too early for Policy Decision or Decision not yet released</div> <div>Cost Application Submission or Final Response to RFI or Answer to Telecoms</div> </div> </div>									

Document Counts - DWCC 2015-2025															
#	Proceeding #	DWCC webpage	CRIC webpage	Request for Hearing/ Accompanying	Procedural Requests	Interventions	Reply to Interventions	Supplementary/ Reimagining	Evidence Reports	Public Hearing/ Hearings/ Presentations	Public Hearing/ Presentation/ Hearings	Undertaking	RFI Reply/ Submission/ Comments	Final Reply/ Submission/ Comments	Totals per proceeding
1	1	1	1	1	2	3	0	1	2	1	1	0	2	3	12
2	2	1	1	0	0	0	1	0	0	0	0	0	0	0	28
3	3	1	1	0	0	0	0	0	0	0	0	0	0	0	1
4	4	1	1	0	0	0	0	0	0	0	0	0	0	0	1
5	5	1	1	0	0	0	0	0	0	0	0	0	0	0	3
6	6	1	1	0	0	0	0	0	0	0	0	0	0	0	21
7	7	1	1	0	0	0	0	0	0	0	0	0	0	0	19
8	8	1	1	0	0	0	0	0	0	0	0	0	0	0	14
9	9	1	1	0	0	0	0	0	0	0	0	0	0	0	8
10	10	1	1	0	0	0	0	0	0	0	0	0	0	0	18
11	11	1	1	0	0	0	0	0	0	0	0	0	0	0	14
12	12	1	1	0	0	0	0	0	0	0	0	0	0	0	14
13	13	1	1	0	0	0	0	0	0	0	0	0	0	0	33
14	14	1	1	0	0	0	0	0	0	0	0	0	0	0	3
15	15	1	1	0	0	0	0	0	0	0	0	0	0	0	7
16	16	1	1	0	0	0	0	0	0	0	0	0	0	0	4
17	17	1	1	0	0	0	0	0	0	0	0	0	0	0	4
18	18	1	1	0	0	0	0	0	0	0	0	0	0	0	22
19	19	1	1	0	0	0	0	0	0	0	0	0	0	0	3
20	20	1	1	0	0	0	0	0	0	0	0	0	0	0	9
21	21	1	1	0	0	0	0	0	0	0	0	0	0	0	5
22	22	1	1	0	0	0	0	0	0	0	0	0	0	0	2
23	23	1	1	0	0	0	0	0	0	0	0	0	0	0	14
24	24	1	1	0	0	0	0	0	0	0	0	0	0	0	14
25	25	1	1	0	0	0	0	0	0	0	0	0	0	0	9
26	26	1	1	0	0	0	0	0	0	0	0	0	0	0	10
27	27	1	1	0	0	0	0	0	0	0	0	0	0	0	9
28	28	1	1	0	0	0	0	0	0	0	0	0	0	0	11
29	29	1	1	0	0	0	0	0	0	0	0	0	0	0	13
30	30	1	1	0	0	0	0	0	0	0	0	0	0	0	15
31	31	1	1	0	0	0	0	0	0	0	0	0	0	0	2
32	32	1	1	0	0	0	0	0	0	0	0	0	0	0	0
33	33	1	1	0	0	0	0	0	0	0	0	0	0	0	0
34	34	1	1	0	0	0	0	0	0	0	0	0	0	0	0
35	35	1	1	0	0	0	0	0	0	0	0	0	0	0	0
36	36	1	1	0	0	0	0	0	0	0	0	0	0	0	0
37	37	1	1	0	0	0	0	0	0	0	0	0	0	0	0
38	38	1	1	0	0	0	0	0	0	0	0	0	0	0	0
39	39	1	1	0	0	0	0	0	0	0	0	0	0	0	0
40	40	1	1	0	0	0	0	0	0	0	0	0	0	0	0
41	41	1	1	0	0	0	0	0	0	0	0	0	0	0	0
42	42	1	1	0	0	0	0	0	0	0	0	0	0	0	0
43	43	1	1	0	0	0	0	0	0	0	0	0	0	0	0
44	44	1	1	0	0	0	0	0	0	0	0	0	0	0	0
45	45	1	1	0	0	0	0	0	0	0	0	0	0	0	0
46	46	1	1	0	0	0	0	0	0	0	0	0	0	0	0
47	47	1	1	0	0	0	0	0	0	0	0	0	0	0	0
48	48	1	1	0	0	0	0	0	0	0	0	0	0	0	0
49	49	1	1	0	0	0	0	0	0	0	0	0	0	0	0
50	50	1	1	0	0	0	0	0	0	0	0	0	0	0	0
51	51	1	1	0	0	0	0	0	0	0	0	0	0	0	0
52	52	1	1	0	0	0	0	0	0	0	0	0	0	0	0
53	53	1	1	0	0	0	0	0	0	0	0	0	0	0	0
54	54	1	1	0	0	0	0	0	0	0	0	0	0	0	0
55	55	1	1	0	0	0	0	0	0	0	0	0	0	0	0
56	56	1	1	0	0	0	0	0	0	0	0	0	0	0	0
57	57	1	1	0	0	0	0	0	0	0	0	0	0	0	0
58	58	1	1	0	0	0	0	0	0	0	0	0	0	0	0
59	59	1	1	0	0	0	0	0	0	0	0	0	0	0	0
60	60	1	1	0	0	0	0	0	0	0	0	0	0	0	0
61	61	1	1	0	0	0	0	0	0	0	0	0	0	0	0
62	62	1	1	0	0	0	0	0	0	0	0	0	0	0	0
63	63	1	1	0	0	0	0	0	0	0	0	0	0	0	0
64	64	1	1	0	0	0	0	0	0	0	0	0	0	0	0
65	65	1	1	0	0	0	0	0	0	0	0	0	0	0	0
66	66	1	1	0	0	0	0	0	0	0	0	0	0	0	0
67	67	1	1	0	0	0	0	0	0	0	0	0	0	0	0
68	68	1	1	0	0	0	0	0	0	0	0	0	0	0	0
69	69	1	1	0	0	0	0	0	0	0	0	0	0	0	0
70	70	1	1	0	0	0	0	0	0	0	0	0	0	0	0
71	71	1	1	0	0	0	0	0	0	0	0	0	0	0	0
72	72	1	1	0	0	0	0	0	0	0	0	0	0	0	0
73	73	1	1	0	0	0	0	0	0	0	0	0	0	0	0
74	74	1	1	0	0	0	0	0	0	0	0	0	0	0	0
75	75	1	1	0	0	0	0	0	0	0	0	0	0	0	0
76	76	1	1	0	0	0	0	0	0	0	0	0	0	0	0
77	77	1	1	0	0	0	0	0	0	0	0	0	0	0	0
78	78	1	1	0	0	0	0	0	0	0	0	0	0	0	0
79	79	1	1	0	0	0	0	0	0	0	0	0	0	0	0
80	80	1	1	0	0	0	0	0	0	0	0	0	0	0	0
81	81	1	1	0	0	0	0	0	0	0	0	0	0	0	0
82	82	1	1	0	0	0	0	0	0	0	0	0	0	0	0
83	83	1	1	0	0	0	0	0	0	0	0	0	0	0	0
84	84	1	1	0	0	0	0	0	0	0	0	0	0	0	0
85	85	1	1	0	0	0	0	0	0	0	0	0	0	0	0
86	86	1	1	0	0	0	0	0	0	0	0	0	0	0	0
87	87	1	1	0	0	0	0	0	0	0	0	0	0	0	0
88	88	1	1	0	0	0	0	0	0	0	0	0	0	0	0
89	89	1	1	0	0	0	0	0	0	0	0	0	0	0	0
90	90	1	1	0	0	0	0	0	0	0	0	0	0	0	0
91	91	1	1	0	0	0	0	0	0	0	0	0	0	0	0
92	92	1	1	0	0	0	0	0	0	0	0	0	0	0	0
93	93	1	1	0	0	0	0	0	0	0	0	0	0	0	0
94	94	1	1	0	0	0	0	0	0	0	0	0	0	0	0
95	95	1	1	0	0	0	0	0	0	0	0	0	0	0	0
96	96	1	1	0	0	0	0	0	0	0	0	0	0	0	0
97	97	1	1	0	0	0	0	0	0	0	0	0	0	0	0
98	98	1	1	0	0	0	0	0	0	0	0	0	0	0	0
99	99	1	1	0	0	0	0	0	0	0	0	0	0	0	0
100	100	1	1	0	0	0	0	0	0	0	0	0	0	0	0
101	101	1	1	0	0	0	0	0	0	0	0	0	0	0	0
102	102	1	1	0	0	0	0	0	0	0	0	0	0	0	0
103	103	1	1	0	0	0	0	0	0	0	0	0	0	0	0
104	104	1	1	0	0	0	0	0	0	0	0	0	0	0	0
105	105	1	1	0	0	0	0	0	0	0	0	0	0	0	0
106	106	1	1	0	0	0	0	0	0	0	0	0	0	0	0
107	107	1	1	0	0	0	0	0	0	0	0	0	0	0	0
108	108	1	1	0	0	0	0	0	0	0	0	0	0	0	0
109	109	1	1	0	0	0	0	0	0	0	0	0	0	0	0
110	110	1	1	0	0	0	0	0	0	0	0	0	0	0	0
111	111	1	1	0	0	0	0	0	0	0	0	0	0	0	0
112	112	1	1	0	0	0	0	0	0	0	0	0	0	0	0
113	113	1	1	0	0	0	0	0	0	0	0	0	0	0	0
114	114	1	1	0	0	0	0	0	0	0	0	0	0	0	0
115	115	1	1	0	0	0	0	0	0	0	0	0	0	0	0
116	116	1	1	0	0	0	0	0	0	0	0	0	0	0	0
117	117	1	1	0	0	0	0	0	0	0	0	0	0	0	0
118	118	1	1	0	0	0	0	0	0	0	0	0	0	0	0
119	119	1	1	0	0	0	0	0	0	0	0	0	0	0	0
120	120	1													