

TEN YEARS OF PARTICIPATION AND LESSONS FOR FUNDING REFORM

**ACCESSIBILITY COSTS AND EQUITY IN
PUBLIC INTEREST PARTICIPATION -
A DECADE OF EVIDENCE**

REPORT

**INVESTIGATIVE RESEARCH
PREPARED FOR**

**DEAF
WIRELESS
CANADA
COMMITTEE**



**COMITÉ POUR LES
SERVICES
SANS FIL DES
SOURDS DU
CANADA**

**SUBMITTED FOR: BROADCASTING AND TELECOM
NOTICE OF CONSULTATION CRTC 2025-94**

SEPTEMBER 9, 2025

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Land Acknowledgement

“From coast to coast to coast, we acknowledge the ancestral and unceded territory of all the First Nations, Inuit, and Métis peoples that call this land home.”

The Deaf Wireless Canada Consultative Committee - Comité pour les Services Sans fil des Sourds du Canada, (DWCC-CSSSC) wishes to gratefully acknowledge the following individuals for their contribution to the Investigative Research Report.

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Executive Summary

Since 2015, the **Deaf Wireless Canada Consultative Committee (DWCC-CSSSC)** has served as a national Deaf-led voice in CRTC proceedings, filing more than 300 public documents across 32 proceedings and consistently applying an accessibility lens to telecommunications and broadcasting policy. Alongside community organizations, **equity-seeking DDBHH organizations and Deaf-owned businesses** have also played a role as social innovators, contributing lived experience and accessibility expertise that strengthen regulatory participation.

This report, filed in the context of **CRTC 2025-94**, contributes grounded, community-based evidence through a combined ten-year review of filings and interviews with six consultants. Together, these sources reveal systemic inequities in the cost award framework: inaccessible and overly legalistic instructions, ambiguity and repeated challenges around accessibility costs, disproportionate administrative burdens, unexplained cost reductions, delayed reimbursements, and inequitable consultant rate structures that undervalue public-interest expertise compared to corporate legal teams.

Delays in reimbursement remain one of the most significant barriers. Across twenty (20) cost applications filed over the past decade, DWCC has faced wait times averaging 8.9 months, with a median of 9.0 months. Decisions have ranged from as little as 1.0 month (BNC 2025-48) to as long as 18.0 months (BTNC 2020-81) — a 17-month spread that underscores the inconsistency and unpredictability of the current process. These barriers place disproportionate strain on small, equity-seeking organizations and Deaf-owned businesses, forcing them to shoulder financial risks that threaten both their contributions to the **Deaf Ecosystem** and their ability to sustain long-term participation — challenges that industry players, with deeper resources, are able to absorb.

The evidence makes clear that reforms are urgently needed: uniform review standards, explicit recognition of accessibility-related expenses as essential, adoption of merit-based consultant rates, greater transparency and fairness in cost decisions, timely reimbursement, and the embedding of accessibility into every aspect of the cost framework. These measures are not optional — they are necessary to bring the Commission's practices into compliance with the **Accessible Canada Act** and the **2023 Policy Direction**.

~ Lisa Anderson
Writer & Researcher

Note of appreciation: Special recognition is extended to **Jessica Sergeant**, who diligently created the infographics that capture the essence of DWCC's decade of participation. Her work translates complex evidence into clear, accessible visuals, ensuring that the findings of this report are not only documented but also communicated in ways that resonate across communities and stakeholders. Readers can find it throughout the report as well as full scale renderings in [Appendix A](#).

Table of Contents TOC

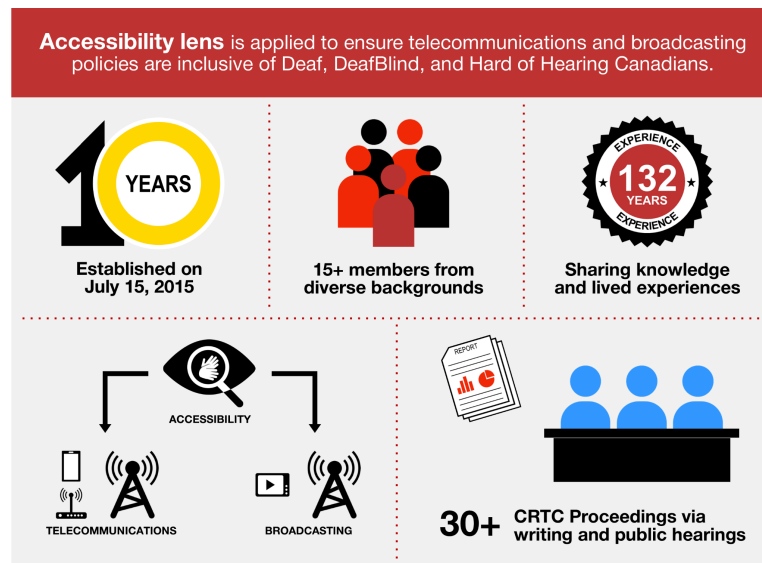
Executive Summary.....	4
About DWCC.....	7
DWCC's Mandate.....	9
Context of the Proceeding.....	11
Purpose of the Evidence Collection.....	12
Application of Methodology to the Proceeding.....	13
Researcher Positionality.....	15
Overall Experience with the Cost Application Process.....	16
Differences between Seasoned vs. Newer Participants.....	16
Shifting to the Numbers.....	17
DWCC's Record of Participation in CRTC Proceedings.....	17
DWCC Document Count (2015–2025).....	18
Volume of Cost Application Documentation.....	19
Nature of the Scrutinizations.....	20
TNC CRTC 2015-134.....	21
TELUS & Bell Joint Objection.....	21
DWCC Responses to the Telcos.....	22
Commission Ultimate Determination.....	23
TNC CRTC 2016-116.....	24
TELUS Objection to Survey Costs.....	24
DWCC Response.....	25
Commission Ultimate Determination.....	26
CRTC TNC 2016-293.....	27
TELUS Objection to Video Costs.....	27
DWCC Response.....	28
Commission Ultimate Determination.....	28
Early Proceedings – Systemic Lessons.....	30
Later Proceedings – Intensified Systematic Scrutiny.....	30
Historical Affiliations and Early Scrutiny.....	31
Uneven Standards and Structural Bias.....	31
Verification of Consultant Start Dates.....	32
Consistency in Application of Standards.....	32
Accountability, Fairness, and Consistency in Cost Awards.....	33
Delays with Cost Payments.....	35
Overall Distribution.....	36
Longest Delays.....	36
Shortest Delays.....	36
Middle Ground.....	36
Spread and Implications.....	36
Observations on DWCC's Participation and Treatment in Cost Applications.....	37

Holidays and Vacations – Accessibility and Fairness Concerns.....	38
Beyond the Numbers – Lived Realities of Cost Recovery.....	40
Issues of Awareness and Communication.....	55
Systemic Inequities and Procedural Barriers.....	56
Accessibility-Specific Challenges.....	56
Transparency & Fairness.....	57
Reimbursement Delays & Financial Impact.....	58
Case Example: TDI Conference 2023.....	59
Systemic Inequities – Unfair Service Charges.....	61
Legal Framework & Obligations.....	64
Deaf-Owned Businesses: Unique Accessibility Insights.....	65
Deaf tech solution businesses participate in proceedings.....	66
Case Study: Maple Communications – Documentation History (TNC 2017-33).....	67
Commission decision.....	67
Implications for Deaf-owned businesses.....	67
Qualification to Participate in CRTC Proceedings.....	68
Request for Participation.....	69
Final Reflections of the DWCC Chair.....	70
Recommendations.....	71
Accessibility and Plain Language.....	71
Recognition of Accessibility Costs.....	72
Transparency and Accountability.....	73
Timeliness and Reduced Administrative Burden.....	73
Deaf-owned businesses.....	74
Simplified Recommendations.....	75
1. Accessibility and Plain Language.....	75
2. Recognition of Accessibility Costs.....	75
3. Transparency and Accountability.....	75
4. Timeliness and Reduced Burden.....	76
5. Clear Communication Mechanism.....	76
6. Support for Deaf-Owned Businesses.....	76
Final Remarks.....	77
Appendix A:.....	79
Infographic Panels.....	79
Appendix B:.....	86
Interview Questions	
Senior Consultants and Accessibility Consultants.....	86
Senior Consultants.....	87
Accessibility Consultants.....	90
Appendix C:	
TDI Conference 2023	
Correspondence & Documentation.....	93

Correspondence Chronology: DWCC Sponsorship Requests for TDI Conference 2023.....	94
Exhibit A: DWCC Letter to CTA - April 27, 2022 - Page 1.....	96
Exhibit A: DWCC Letter to CTA - Page 2.....	97
Exhibit B: CTA Email Reply to DWCC.....	98
Exhibit C: Bell Response to DWCC - Sept 7, 2022.....	99

About DWCC

1. Since 2015, **DWCC** is a national consumer group representing Deaf, DeafBlind, and Hard-of-Hearing (DDBHH) communities, and is committed to ensuring that the voices of equity-seeking groups are directly reflected in the public record.
2. The Deaf Wireless Canada Consultative Committee - Comité pour les Services Sans fil des Sourds du Canada (**DWCC** - CSSSC or "**DWCC**"), advocates for the full inclusion of diverse members within the Canadian Deaf, Deaf-Blind, and Hard of Hearing (**DDBHH**) community in Canadian society.



3. The abbreviation "**DDBHH**" going forward is an umbrella term encompassing Deaf, DeafBlind, and Hard of Hearing communities, including Indigenous Deaf individuals. It ensures broad representation while recognizing that Indigenous people are always Indigenous first, before being Deaf.
4. The spectrum of DDBHH life experiences, including those that are Indigenous and 2SLGBTQIA+, and ranges from those with cognitive delay or have neurodiversity, immigrants learning English or French as a second language, those with various degrees of hearing loss, those with the unique "double" disability as Deaf-Blind, and finally native ASL/LSQ users.
5. Additionally, **DWCC** supports that Indigenous users have the right to ask for support, including requesting Indigenous Sign Language interpreters. When **DWCC** writes DDBHH, it is inclusive of all those with intersectional identities.

DWCC's Mandate

Advancing **full accessibility** by ensuring equitable access to information, communication, sign languages, network coverage, and emergency services.



COVERAGE

Advancing **digital inclusion** through accessibility plans, strong signal and speed, outage transparency, two-way sync, public alert access, and anti-throttling measures.



VIDEO RELAY SERVICES

Giving feedback on the Video Relay Services, including service delivery and budget utilization, to ensure accountability and **communication accessibility**.



DIRECT VIDEO COMMUNICATION

Accessible service delivery and complaint feedback processes in American Sign Language and la langue des signes québécoise.



CAPTIONING

Improving closed captioning by increasing accuracy, availability, and visual customization to ensure equitable **information accessibility**.



SIGN LANGUAGES-BASED BROADCASTING

Advancing **sign language accessibility** by supporting American Sign Language and la langue des signes québécoise content creation and **Deaf-led media**.

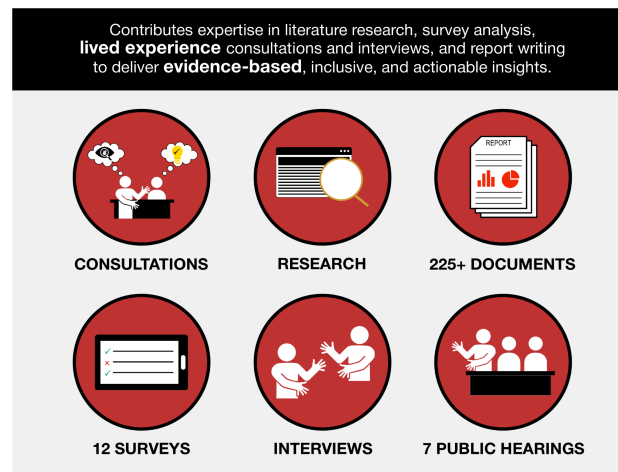


3-DIGIT CRISIS CALLS

Enhancing **emergency accessibility** of next-generation **9-1-1**, emergency network reliability, and **9-8-8** services for mental health crisis and suicide prevention.

6. DWCC's mandate is to advocate for accessible wireless communications equity for DDBHH Canadians, including but not limited to:
- a. Cost-reasonable, **accessible wireless data plans for ASL and LSQ users** for two-way video calls.
 - b. **Accessible** industry-wide **promotions of wireless services and products**.
 - c. Removal of disparities in the costs of the same accessible wireless products and services within each company.
 - d. **Provision of functional equivalent wireless products and services**, including wireless applications (apps).
 - e. **Accessible wireless emergency services** (including emergency alerts, 9-8-8, and direct text to 911) **and wireless data plans for ASL and LSQ users**.

- f. **Nationwide public awareness, education and outreach** on currently accessible wireless and mobile communication products and services.
 - g. **Broadcasting accessibility**, ensuring equitable representation and inclusion of DDBHH communities across television, online streaming, and digital media platforms.
- 7. **DWCC** consistently applies an accessibility lens to ensure telecommunications and broadcasting proceedings are inclusive of Deaf, DeafBlind and Hard of hearing Canadians.
- 8. **DWCC** is currently undergoing a strategic update of its name and mandate to reflect today's evolving social and regulatory priorities, with an increased emphasis on addressing accessibility challenges in **both** broadcasting and telecommunications. This aligns with the *Accessible Canada Act* (royal assent: June 21, 2019), which affirms a national commitment to building a barrier-free Canada by 2040.
- 9. **DWCC** members have a range of experience with CRTC, with the most senior member having 38 years of experience, to senior-junior members with as many as 17 years experience, and include several new members with three years of experience, having joined the VRS Review proceeding (NOC 2021-102) as their first participation in a CRTC process.
- 10. **DWCC** members have contributed literature research, survey analysis, lived experience consultations and interviews, and report writing to deliver evidence-based inclusive and actionable insights. This is done by submissions of research, including 12 surveys, interviews, the submission of over 225 documents and the participation in 7 public hearings as consultative and analyst insights provided by intensive questioning in the cost application process.



11. **DWCC** has a history of partnering with organizations such as the Canadian Association of the Deaf - Association des Sourds du Canada (**CAD-ASC**), Canadian National Society of the Deaf-Blind (**CNSDB**), and has a strong supportive network with regulatory public interest groups such as Public Interest Advocacy Centre (**PIAC**) and Forum for Research and Policy in Communications (**FRPC**).
12. **DWCC** has been called to participate in accessibility consultative and engagement committees for such organizations as the Canadian Administrator of VRS (**CAV**), Canadian Telecommunications Association (**CTA**), TELUS, Rogers, Freedom, Shaw, and Bell.
13. **DWCC** has participated in both CRTC regulatory proceedings and federal consultation processes advancing accessibility. This includes contributing to the Ministry of Industry's review of the Policy Direction to the CRTC, which resulted in the 2019 Policy Direction including accessibility and its 2023 update with further emphasis on access. **DWCC** also took part in the 2019 Broadcasting and Telecommunications Legislative Review (**BTLR**) panel and submission process. **DWCC** prides itself on its application of DDBHH accessibility lens when doing consultative and public participation in regulatory processes at the federal level. From time to time, it has been called to participate in provincial accessibility matters.

Context of the Proceeding

14. On May 12, 2025, the Canadian Radio-television and Telecommunications Commission (CRTC) launched Broadcasting and Telecom Notice of Consultation 2025-94 to modernize how it funds public-interest participation in its proceedings. The cost award framework has remained largely unchanged for more than a decade and, as the Commission itself has recognized, it often fails to adequately support smaller equity-seeking organizations, that include groups such as ours, those representing Deaf, DeafBlind, and Hard-of-Hearing (**DDBHH**) Canadians. Existing processes are widely viewed as overly complex, slow, and inconsistent across broadcasting and telecom domains.
15. The proceeding calls for evidence on several key issues: the development of a unified funding system, the possible use of an independent third-party fund, broadened eligibility criteria, clearer definitions of cost categories, timelier provision of funding, and greater administrative clarity. The Notice also introduces a simplified process for interim cost awards—already applied in cases involving the Public Interest Advocacy Centre and DWCC—to provide upfront financial

support, while instructing applicants to participate responsibly and incorporating telecom-style review procedures to improve efficiency.

16. This report contributes to the record of CRTC 2025-94 through a mixed-methods approach. There are quantitative and qualitative sections to this report.
17. The first stage is quantitative, drawing on a ten-year longitudinal review of CRTC filings by DDBHH organizations, drawing from particular groups such as the DWCC, CAD-ASC, CNSDB, and DBPC.
18. This review documents the volume and types of interventions, research studies, and cost applications submitted, the responses and interrogatories during cost application phase, providing a data-driven overview of participation trends and resource demands across more than thirty proceedings.
19. The second stage is qualitative, consisting of in-depth interviews with six experienced consultants and advocates who have navigated the cost application process. Their testimonies provide detailed insight into how the framework functions in practice, highlighting the systemic challenges, inequities, and barriers that the Commission's reform process must address.
20. By combining these two approaches, the report ensures that the evidence base is both broad—capturing the scale and frequency of participation—and deep—centering the lived experiences of those who have carried out this work on behalf of DDBHH communities.

Purpose of the Evidence Collection

21. The purpose of this evidence collection is to provide the CRTC with a comprehensive and grounded understanding of how the current cost application framework impacts Deaf, DeafBlind, and Hard of Hearing (DDBHH) organizations. By combining a ten-year review of filings and cost applications with in-depth interviews from six experienced consultants and advocates, the report captures both the quantitative scale of participation and the qualitative realities of navigating the system.
22. The intent is not only to document recurring challenges—such as complexity, delays, and inequities—but also to highlight patterns across multiple voices and years of engagement. In doing so, the evidence reinforces why reforms under **CRTC 2025-94** must embed accessibility and equity into the cost process, ensuring that DDBHH communities can participate on fair and sustainable terms.

Application of Methodology to the Proceeding

- 23.** This report applies its methodology in two complementary ways, supplemented by infographics to illustrate findings. First, the team conducted a detailed review of DWCC’s history of submissions, focusing on the number of cost application documents filed over its ten years of participation in CRTC proceedings. This quantitative review produced statistics and data that were then translated into infographics, visually demonstrating the scale of DWCC’s cumulative work. The documents were also organized to highlight exchanges between all parties, showing a level of scrutiny applied to DWCC that exceeded what could reasonably be anticipated.
- 24.** Second, the report is grounded in interviews with six consultants who have direct experience with CRTC proceedings and cost applications. These qualitative insights form a core evidence base, complementing the quantitative review. By drawing on both dimensions, the report situates personal experience alongside measurable data, providing a balanced analysis of the systemic challenges faced by accessibility-focused groups.
- 25.** The interview-based methodology directly supports the objectives of Broadcasting and Telecom Notice of Consultation CRTC 2025-94. By collecting testimony from consultants with varied levels of experience—from long-time participants with institutional knowledge to newer representatives navigating the process for the first time—the report provides grounded, real-world accounts of how the cost framework operates in practice. Their experiences illustrate the very challenges identified by the Commission in initiating this proceeding: complexity, inequity, inconsistent recognition of accessibility costs, lack of transparency, and prolonged delays in reimbursement.
- 26.** The findings also reinforce the need for reforms that embed accessibility as a core principle in line with Canada’s broader legal framework. These include the Charter of Rights and Freedoms¹, which guarantees equality rights; the Supreme Court of Canada’s decision in *Eldridge v. British Columbia (Attorney General)*,² which established that governments must provide sign language interpretation in medical settings; the Federal Court’s ruling in *Canadian Association of the Deaf v. Canada* (2006 FC 971),³ which affirmed accessibility obligations at the federal level; the Canadian Human Rights Act,⁴ which prohibits discrimination on the

¹ Charter of Rights and Freedoms, s. 15

² *Eldridge v. British Columbia (Attorney General)*, [1997] 3 S.C.R. 624

³ *Canadian Association of the Deaf v. Canada* (2006 FC 971)

⁴ Canadian Human Rights Act, RSC 1985, c H-6

basis of disability; the Accessible Canada Act,⁵ which requires the removal of barriers to accessibility; and the 2023 Policy Direction, which directs the CRTC to prioritize equity and inclusion in its regulatory frameworks.⁶

- 27.** In order to bring these systemic issues into focus, the report now turns to the six consultants who contributed their expertise and lived experience through interviews. Their perspectives provide both breadth and depth, offering insight into how the cost application framework has functioned across different roles, organizations, and timeframes.
- 28.** As part of this research, two complementary sets of questions were developed to capture a full range of perspectives on the cost application process.
- 29.** The first set was directed to senior consultants with extensive experience preparing or managing cost applications on behalf of organizations such as DWCC, CAD-ASC, and other public interest groups. These written questions focused on their roles and responsibilities, overall experience navigating the Commission's process, and the clarity of requirements.
- 30.** Senior consultants were also asked to identify challenges in compiling documentation, determining eligibility for costs—including accessibility-related disbursements such as interpretation or accessible document preparation—and to comment on instances where costs were disallowed or reduced. Additional questions examined whether the process adequately accounts for accessibility-related work, the impact of reimbursement outcomes on future participation, and what reforms they would recommend to improve fairness, transparency, and accessibility.
- 31.** The second set of questions was designed for accessibility consultants and subject-matter experts familiar with CRTC proceeding 2025-94. These interviews were more structured and organized thematically, covering background and experience with cost applications, process clarity, barriers and challenges, and specific issues related to accessibility and inclusion. Participants were asked about the availability and treatment of accommodations such as ASL/LSQ interpretation, captioning, and accessible documentation. They were also invited to assess the financial impacts of reimbursements or unrecovered costs, and to share lessons and recommendations for reform. The final reflections encouraged them to comment on whether the current framework supports or hinders public

⁵ Accessible Canada Act, SC 2019, c 10

⁶ Order Issuing a Direction to the CRTC on a Renewed Approach to Telecommunications Policy, SOR/2023-234.

interest participation and to consider whether the proposed changes under 2025-94 adequately address the barriers they identified.

- 32.** All of the questions, both written and interview-probed key challenges, including the eligibility of costs (especially accessibility-related expenses), experiences with unexpected reductions or disallowances, and whether the current framework genuinely supports accessibility-focused public interest groups. Participants were also asked how reimbursement outcomes shaped their ability to continue participating in future proceedings. To find the Interview questions, check [Appendix B](#).
- 33.** To complement these accounts, a structured interview guide was created for CRTC proceeding 2025-94. Organized around seven themes, the guide addressed: background and experience with cost applications; clarity of process and documentation requirements; barriers such as eligibility issues and timing; accessibility and inclusion of supports like ASL/LSQ interpretation and captioning; financial impacts of reimbursements or unrecovered expenses; lessons and recommendations for reform; and final reflections on whether the current framework supports or hinders public interest participation. Together, the written and interview components generated both detailed personal narratives and broader comparative insights from DWCC, CAD-ASC, and other public interest organizations to inform the record.

Researcher Positionality

- 34.** In preparing this report, I acknowledge the dual role I bring as both researcher and long-time participant in CRTC proceedings. With 17 years of direct experience in 28 cost application processes, I am uniquely positioned to contextualize and analyze the evidence presented by the consultants. This extensive background, however, carries the risk of bias, as my own experiences may shape the interpretation of themes and findings.
- 35.** To mitigate this risk, I have prioritized the voices and testimonies of the six consultants as the central evidence base. At the same time, my professional and lived expertise enables me to highlight systemic patterns across multiple proceedings and reinforce the significance of the challenges identified. This positionality statement is offered in the spirit of transparency, ensuring that both the strengths and limitations of my perspective are clear.
- 36.** With this context established, the report now turns from the researcher's positional lens to the lived realities of those who have navigated the cost application process themselves. The following section profiles six consultants

whose perspectives ground the analysis in first-hand experience, ensuring that the findings are not solely shaped by one researcher's interpretation but by a range of voices from within the community.

37. While these distinctions highlight how the process is experienced differently depending on one's level of familiarity, the qualitative accounts are further reinforced by quantitative evidence. DWCC's extensive record of filings and cost applications provides measurable confirmation that the barriers described by participants are not isolated incidents but consistent patterns observable across a decade of engagement.

Overall Experience with the Cost Application Process

Profile of Interviewees

38. To ground the analysis in real-world experience, this report draws on the insights of six consultants who have engaged directly with the CRTC's cost application process. Their perspectives, spanning long-standing experts to newer participants, offer a cross-section of how the framework has been experienced in practice.

Differences between Seasoned vs. Newer Participants

39. A clear distinction emerged between the experiences of seasoned participants and those of newer entrants to the CRTC cost application process. Long-time consultants, with over a decade of involvement, emphasized systemic patterns such as chronic delays, inequitable treatment of accessibility costs, and the imbalance of power with telecom companies, drawing on years of accumulated frustrations to illustrate how these barriers have persisted. In contrast, newer participants described feeling overwhelmed by the complexity of the forms, the high literacy level of instructions, and the reliance on peer mentorship to navigate the process for the first time. While both groups identified similar barriers, the difference lies in perspective: seasoned consultants highlight entrenched inequities that have discouraged participation over time, while newer voices underscore the steep learning curve and immediate accessibility challenges that deter broader engagement.
40. While the interviews provide essential qualitative insight into lived experiences with the cost application framework, these accounts are reinforced by a quantitative record of DWCC's sustained engagement at the CRTC. Over the past decade, DWCC has not only participated in dozens of proceedings but has also produced a significant body of submissions, interventions, surveys, and cost

applications. Examining this record offers a numerical foundation that complements the consultants' testimonies, demonstrating that the challenges they describe are not isolated incidents but patterns that have persisted across multiple proceedings. The following section summarizes DWCC's documented participation, providing the quantitative context that anchors the subsequent analysis of systemic issues.

41. While these distinctions highlight how the process is experienced differently depending on one's level of familiarity, the qualitative accounts are further reinforced by quantitative evidence. DWCC's extensive record of filings and cost applications provides measurable confirmation that the barriers described by participants are not isolated incidents but consistent patterns observable across a decade of engagement.
42. To place these testimonies in context, the report now turns to the documentary record. By tracing DWCC's participation across ten years of proceedings, the numbers confirm that the challenges identified by consultants are reflected in a sustained and extraordinary level of engagement with the Commission.

Shifting to the Numbers

43. The interviews highlight how consultants experience the cost application process in practice. To complement these lived experiences, the following section turns to the numbers: DWCC's documented record of submissions, interventions, and cost applications over the past decade. This quantitative evidence reinforces that the barriers identified in interviews are not isolated stories, but consistent patterns visible across years of participation.
44. Looking at DWCC's filing history also makes it possible to see the scale and diversity of our contributions — from procedural requests and accessibility motions to detailed reports, petitions, and final replies. These filings map the organization's evolution from a new participant to a recognized public interest body.

DWCC's Record of Participation in CRTC Proceedings

45. Since its inception in 2015, the Deaf Wireless Canada Consultative Committee (DWCC) has maintained a consistent and substantive presence in CRTC proceedings. Between 2015 and 2025, DWCC has participated in a total of thirty-two (32) proceedings, including Part 1 applications, Review and Vary applications, and other Notice of Consultation (NOC) processes. Of these, six proceedings were undertaken without submitting a cost application, leaving

twenty-six (26) proceedings in which DWCC filed a cost application in accordance with the Commission's procedures.

- 46. This record of appearances illustrates that DWCC has not been a peripheral actor, but a steady and recognized participant in the Commission's processes. The breadth of proceedings entered underscores both the range of accessibility issues addressed and the persistence required of a community-based organization to remain engaged.
- 47. To understand what this level of participation looks like in practice, the report catalogues DWCC's submissions by type. This tally underscores both the workload placed on a small community-based organization and the consistency with which it has contributed to Commission deliberations.
- 48. Counting filings also sheds light on the hidden labour behind each proceeding. Beyond a single intervention, participation typically generates multiple rounds of submissions, replies, and supporting materials, each requiring significant time and expertise.
- 49. To date, ending specifically on August 31, 2025, the DWCC has filed **over 300 documents** in CRTC proceedings, as outlined below.
- 50. The following breakdown illustrates the scope of DWCC's submissions, ranging from accessibility motions to technical interrogatory replies, reports, and supporting materials. Each category highlights a distinct form of advocacy, and together they build an extraordinary record of sustained engagement.

DWCC Document Count (2015–2025)

- 51. To compile this tally, the researcher reviewed the CRTC's online cost application archives and cross-referenced www.deafwireless.ca to verify the numerical record of DWCC's participation in Commission proceedings:
 - a. Requests for Hearing Accessibility: **10**
 - b. Procedural Requests: **48**
 - c. Interventions: **38**
 - d. Replies to Interventions: **23**
 - e. Supplementary Materials / Infographics: **18**
 - f. Evidence / Reports / Petitions: **25**
 - g. Notes for Handouts at Hearings: **8**
 - h. PowerPoint Presentations: **7**
 - i. Undertakings: **4**
 - j. Requests for Information (RFI) Replies / Further Comments: **31**

- k. Final Replies: **15**
- l. Cost Application Documentation: **71**
- m. Review and Vary Applications: **2**

- 52.** Cumulatively, in total, **300 documents** have been submitted to the CRTC record. This figure excludes confidential filings, counting only those published on the Commission's website and/or on and/or **DWCC** website.
- 53.** While a numerical tally cannot capture the full effort behind each filing, the breadth of categories, from infographics to interrogatory replies, demonstrates how DWCC has had to mobilize technical, legal, and community expertise at every stage of a proceeding.
- 54.** This record provides a measurable demonstration of DWCC's consistent and active engagement with the Commission over the past decade. The volume and diversity of documents, from procedural requests to substantive evidence and final replies, illustrate both the breadth and depth of DWCC's contributions. This sustained participation reinforces the legitimacy of DWCC's consultant and analyst rate claims and reflects the organization's ongoing capacity to represent the public interest effectively and knowledgeably.
- 55.** Such participation reflects DWCC's role as a dedicated and experienced contributor to the development of telecommunications and broadcasting policy, particularly on matters impacting Deaf, Deaf-Blind, and Hard of Hearing Canadians. Unlike organizations with intermittent appearances, DWCC's record demonstrates sustained engagement over a ten-year period.
- 56.** Within this broader record, the cost application phase of each proceeding stands out as particularly intensive. These filings are not limited to a single form but require extensive supporting documentation and repeated rounds of responses to both the Commission and telecommunications providers.

Volume of Cost Application Documentation

- 57.** In addition to its sustained participation across proceedings, DWCC's **twenty-eight (28)** cost applications have consistently involved a substantial amount of documentation. These filings extend well beyond the initial cost application forms, encompassing responses to interrogatories from telecommunications service providers, replies to Commission requests for information (RFIs), and supplementary submissions to address procedural or evidentiary issues.
- 58.** The **seven (7)** examples below illustrate the volume and complexity of cost application documentation DWCC has produced in several key proceedings:
- a. **Telecom Notice of Consultation 2015-134** – *12 cost application documents*, including procedural, multiple responses to

telecommunications providers and CRTC RFIs.

- b. **Telecom Notice of Consultation 2016-116** – 5 cost application documents, including responses to telecoms.
 - c. **Telecom Notice of Consultation 2016-293** – 6 cost application documents, including follow-up submissions.
 - d. **Telecom Notice of Consultation 2017-33** – 4 cost application documents, including replies to queries and clarifications.
 - e. **Telecom Notice of Consultation 2018-98** – 4 cost application documents, including replies to queries and clarifications.
 - f. **Telecom Notice of Consultation 2020-178** – 10 cost application documents, including multiple telecom responses and CRTC RFIs.
 - g. **Telecom Notice of Consultation 2021-102** – 6 cost application documents, including procedural clarifications and responses to interrogatories.
59. This brings the total to **47 cost application-related documents** submitted to the CRTC for these specific **7 proceedings**, an extraordinary level of participation concentrated in the cost application phase. These filings include both RFI answers to the Commission and detailed responses to telecommunications providers.
60. The record demonstrates not only the frequency of DWCC's cost applications but also the substantive workload involved in responding to inquiries from both the Commission and service providers. Each proceeding required the production of multiple, detailed documents, clear evidence of DWCC's diligence in meeting procedural requirements, addressing stakeholder concerns, and maintaining transparency in the cost award process. **Yet diligence alone did not shield DWCC from the heightened scrutiny that came to define its participation.**

Nature of the Scrutinizations

61. However, the volume of filings alone does not capture the full picture. The intensity and nature of the work reveal the significant burden placed on a small, community-based organization. Cost applications were never a routine administrative step; they became contested exercises that often drew further scrutiny from the Commission or objections from telecommunications providers. As a result, DWCC was forced to expend additional effort defending the legitimacy of its costs and the eligibility of its accessibility-related work.
62. These patterns became evident as early as DWCC's first major proceeding in 2015, when industry objections set the tone for the heightened examination that has characterized its participation ever since. To illustrate this history, the report

highlights **three initial proceedings: TNC CRTC 2015-134, 2016-116, and 2016-293**, where DWCC's applications were subjected to intensive challenges. These early cases not only defined DWCC's entry into the cost award framework but also established a precedent: that accessibility-focused organizations would be held to a higher threshold of proof than other participants. While burdensome, they revealed systemic dynamics that would reappear, often with greater severity, in later years. The following section then turns to **three later proceedings: TNC CRTC 2017-33, 2020-178, and 2021-102**, where the scrutiny reached its most severe form.

- 63.** To illustrate how these dynamics played out in practice, the report now turns to specific proceedings. The first example, TNC CRTC 2015-134, shows how DWCC's very legitimacy and consultant status were placed under close examination, setting the precedent for challenges that continued in later years.

TNC CRTC 2015-134

- 64.** The documentary record of DWCC's earliest cost applications shows how questions of legitimacy, eligibility, and consultant status were tested in detail. Beginning with TNC 2015-134, the Commission and telecommunications service providers scrutinized DWCC's filings line by line, raising objections not only about costs claimed, but also about the very basis of who could be recognized as a consultant or analyst. These exchanges provide a window into the systemic barriers DWCC encountered from its first participation in the cost recovery process, setting the tone for subsequent proceedings where similar challenges repeatedly arose.
- 65.** One of the most significant clashes in this proceeding centered on the telcos' attempt to redefine who counted as a legitimate consultant for cost recovery purposes.

TELUS & Bell Joint Objection

- 66.** At the outset, telecommunications service providers challenged the very foundation of DWCC's cost claims. TELUS and Bell argued that because DWCC's consultants began as volunteers, their work should not be compensable.⁷ They further claimed that DWCC had misapplied the consultant rate structure by categorizing members as external consultants rather than in-house resources, and even sought to deduct amounts raised through community fundraising. These objections reflect a narrow interpretation of the Guidelines⁸, one that discounted both lived expertise and the unique

⁷ CRTC *Telecom Order CRTC 2017-137*, 4 May 2017. Available at: <https://crtc.gc.ca/eng/archive/2017/2017-137.htm>

⁸ TELUS Communications and Bell Canada, *Joint Objection to Cost Application by DWCC*, 2016. (Paraphrased in CRTC Order 2017-137).

circumstances of equity-seeking groups:

- a. “The DWCC’s consultants were serving as volunteers. Therefore, since the DWCC did not actually incur the associated costs, it is not appropriate for those costs to be recovered under the Commission’s costs awards process and those costs should be removed.” — *TELUS & Bell* ⁹
- b. “DWCC had improperly claimed the external consultant rates. [...] The five individuals were in-house resources, and as such, the daily rate for in-house consultants, as established in the Guidelines, should have been used.”— *TELUS & Bell* ¹⁰
- c. “DWCC fundraised \$2,134.15 to support its participation [...] This amount should be deducted from the allowable costs claimed.” — *Bell* ¹¹

67. DWCC countered these arguments by emphasizing the extraordinary scope of work involved, the reliance on lived experience in lieu of legal counsel, and the need for recognition as external consultants. The Committee’s responses reframed volunteer beginnings as professional-level commitments, underlining the legitimacy of its consultants.

DWCC Responses to the Telcos

68. In reply, DWCC firmly defended the legitimacy of its consultants and their contributions. DWCC emphasized that the extraordinary number of hours invested, the reliance on lived experience in lieu of legal representation, and the growing demands of the proceeding justified recognition as external consultants under the Guidelines. The Committee clarified that while members initially entered the process voluntarily, the workload quickly escalated into sustained, professional-level commitments requiring appropriate compensation. In making these arguments, DWCC underscored that its analysts represented not only the organization but also the broader Canadian Deaf community in ensuring telecommunications accessibility:

- a. “These five people spent an extraordinary amount of hours. [...] As per Guidelines for the Assessment of Costs (23 Dec 2010), we feel it appropriate that we fit the definition of #3(d) [...] ‘consultant or analyst.’”

⁹ TELUS and Bell, Joint Objection, 2016.

¹⁰ TELUS and Bell, Joint Objection, 2016.

¹¹ BELL Response to Costs - DWCC Costs, in CRTC archives as DM#2671015 - 2015-134 - Responses to Costs - Bell Canada - 160729-Bell Canada - TNC 2015-134 - DWCC Costs - Response, 2016.

— DWCC reply to TELUS¹²

- b. “While other groups had lawyers, we had to use our internal knowledge relevant to our lived experiences.”— DWCC to TELUS¹³
- c. “We may have started out as volunteers, but as the proceeding progressed, it demanded more hours than expected.” — DWCC reply to Bell¹⁴
- d. “Lisa Anderson-Kellett and Jeffrey Beatty’s rates were determined based on experience.”— DWCC to Bell¹⁵
- e. “Our five consultants [...] represent DWCC members as a whole, as well as the Canadian Deaf Community. This makes us consultants in telecommunications accessibility for sign language-using Canadians.” — DWCC to Bell¹⁶

69. The Commission’s ruling provided a decisive resolution to this dispute, affirming that DWCC’s members qualified as external consultants and that their costs were both reasonable and necessary.

Commission Ultimate Determination

70. The Commission ultimately sided with DWCC, affirming that its members were acting as external consultants and that their expertise and experience qualified them for compensation at the external consultant rate. In Order 2017-137, the Commission concluded that the costs claimed had been “necessarily and reasonably incurred” and allowed the revised amount of \$78,241.51. This determination validated DWCC’s position and established an important precedent that lived and community-based expertise could be recognized on par with more conventional professional backgrounds in the cost award process:

- a. “The Commission considers that the DWCC’s members were acting as **external consultants**. [...] Given this, as well as their expertise and experience, their work was compensable under the external rate.” —

¹² DWCC Response to Telus queries regarding Costs, TNC CRTC 2015-134 in CRTC archives as #DM#2692161 - 2015-134 - Responses to Costs - DWCC - ResponsetoTelusqueriesregardingCosts, 2016.

¹³ DWCC, Response to TELUS queries, 2016.

¹⁴ DWCC Response to Bell queries regarding Costs, TNC CRTC 2015-134 in CRTC archives as DM#2692163 - 2015-134 - Responses to Costs - DWCC - ResponsetoBellqueriesregardingCosts FINAL, 2016.

¹⁵ DWCC, Response to Bell queries, 2016.

¹⁶ DWCC, Response to Bell queries, 2016.

- b. “Total revised amount claimed by the DWCC, **\$78,241.51**, was necessarily and reasonably incurred and should be allowed.” — *CRTC Conclusion*¹⁸

71. With as many as ten cost application documents submitted in a single proceeding, including multiple responses to CRTC requests for information and rebuttals to telecom arguments, TNC 2015-134 illustrates the heavy workload carried by a small, community-based organization. It also established a precedent that lived and community-based expertise could stand on equal footing with conventional professional representation in the cost award process. Yet the precedent set in 2015 did not prevent similar challenges from arising again the following year.”

TNC CRTC 2016-116

72. The Commission’s recognition of DWCC’s members as external consultants in TNC 2015-134 did not resolve the challenges the organization faced in subsequent proceedings. In TNC 2016-116, the same pattern of heightened scrutiny re-emerged.

73. Telecommunications service providers continued to question the legitimacy of DWCC’s cost claims, focusing again on consultant rates, time allocations, and the eligibility of accessibility-related work. As with the earlier proceeding, DWCC was required to devote substantial time and resources to defending the validity of its participation, highlighting a persistent imbalance in how cost applications from community-based organizations were treated compared to those of industry participants.

74. One of the central disputes in this proceeding focused on the treatment of survey-related costs.

TELUS Objection to Survey Costs

75. The heightened scrutiny extended beyond consultant rates and hours worked to the very evidence DWCC brought forward. In TNC 2016-116, TELUS singled out DWCC’s survey work, questioning both its eligibility and its relevance to the proceeding. The company argued that the costs associated with designing, conducting, and reporting on the survey should be disallowed, claiming the report was not part of the official record and therefore could not have assisted the Commission:

¹⁷ CRTC *Telecom Order CRTC 2017-137*, 4 May 2017. Available at: <https://crtc.gc.ca/eng/archive/2017/2017-137.htm>

¹⁸ CRTC, *Telecom Order CRTC 2017-137*, 4 May 2017.

- a. “The costs claimed by DWCC related to developing and conducting the survey and creating an associated report are ineligible for reimbursement because the report was not part of the record of the proceeding.” - *TELUS*¹⁹
- b. “Since interested parties were unable to comment on the survey report, the Commission could not have considered it. Therefore, the report could not have assisted the Commission in developing a better understanding.” — *TELUS*²⁰

76. In reply, DWCC defended the necessity and legitimacy of its survey and accessibility measures, stressing that the work had been undertaken at the Commission’s own request and was essential to Deaf and DeafBlind participation.

DWCC Response

77. In its reply, DWCC emphasized that the ASL and LSQ videos were created at the direct request of CRTC staff to ensure Deaf community members could engage meaningfully in the proceeding. The organization stressed that these were not promotional materials but vital accessibility tools. DWCC also explained the technical setback of a hard drive crash, which required personal funds to recover files. To deny reimbursement on this basis, DWCC argued, would unfairly penalize Deaf consultants and undermine sign language accessibility.

- a. “DWCC’s Survey was accepted and is listed in the record as ‘Presentations at hearing - Survey Analysis Report: Redefining Accessible...’ We consider this proof that the CRTC accepted the Survey as evidence.” — *DWCC response to TELUS*²¹
- b. “DWCC’s oral hearing presentation was based on this very survey. Without it, the Commission and all parties would not have understood the lived experience of DDBHH Canadians with 911 access barriers.” — *DWCC on necessity of survey*²²
- c. “The majority of the survey responses indicated that they were TELUS customers. It would be highly ironic if TELUS’s objections were upheld and their own customers were thereby excluded.” — *DWCC rebuttal to TELUS*²³

¹⁹ TELUS Response to DWCC Costs Claim in TNC 2016-116, in CRTC archives as *DM#2839873 - Answer to Costs - 170317 TELUS DWCC Costs Claim TNC 2016-116-pdf.pdf*, 2017.

²⁰ TELUS, Response to DWCC Costs, 2016-116, 2017.

²¹ DWCC Response to Telus queries regarding Costs, in CRTC archives as *#DM#2849956 - DWCC - Answer to Costs - DWCCResponse to TELUS Answer about TNC 2016-116 Cost Application - 23 March 2017 - FINAL*, 2017.

²² DWCC, Response to TELUS queries, 2017.

²³ DWCC, Response to TELUS queries, 2017.

78. DWCC highlighted the **significant efforts made to include DeafBlind participants**:

- a. Orientation, guidance, and accessible formatting for survey analysis
- b. Descriptive transcript of PowerPoint slides
- c. Customized formatting due to visual impairment
- d. Manual charting re-done due to software incompatibility across 7 provinces

79. Therefore DWCC defended their accessibility efforts with:

- a. “TELUS is literally invalidating the efforts of the DeafBlind persons involved and the Committee’s contributions based on a possible misinterpretation of procedural guidelines.” — *DWCC defense*²⁴

80. The Commission ultimately acknowledged the value of the survey while moderating the associated costs.

Commission Ultimate Determination

81. “The Commission confirms that the survey report was **added to the record** and parties had the opportunity to comment on it in their final submissions.” — *CRTC*²⁵

82. “The costs for the survey were **greater than any other applicant’s total claim**. While helpful, the **level of assistance was not proportional** to the costs. The Commission **reduced the survey-related costs by half**.” — *CRTC ruling*²⁶

83. While the Commission recognized the survey as part of the record, its decision to reduce the associated costs by half underscored the double burden placed on accessibility groups: not only must they innovate to include marginalized communities, but they must also defend the legitimacy of those efforts against both industry objections and the Commission’s own cost-benefit calculations. The following proceeding, TNC CRTC 2016-293, continued this pattern, with DWCC once again facing intensive challenges to its filings.

84. The survey disputes of 2016-116 showed that even when accessibility initiatives were undertaken at the Commission’s request, they were still subjected to industry objections and partial disallowances. The following proceeding, TNC

²⁴ DWCC, Response to TELUS queries, 2017.

²⁵ CRTC Telecom Order 2018-66, 16 February 2018, available at: <https://crtc.gc.ca/eng/archive/2018/2018-66.htm>

²⁶ CRTC Telecom Order 2018-66, 2018.

CRTC 2016-293, brought these tensions into sharper focus as DWCC's sign-language video work was placed under heavy scrutiny."

CRTC TNC 2016-293

- 85.** The 2016-293 proceeding marked another pivotal moment in DWCC's history of cost applications. While DWCC's efforts centered on making the process accessible to the Deaf community through ASL and LSQ video materials, its claims were again met with objections from telecommunications companies, particularly TELUS. These objections targeted not only the eligibility of video-related costs but also the broader question of how accessibility work should be valued within the Commission's framework.
- 86.** TELUS's position in this proceeding exemplified the recurring industry pushback against accessibility measures.

TELUS Objection to Video Costs

- 87.** At this stage, TELUS argued that DWCC's video costs should be disallowed, contending that the videos were not part of the public record and were uploaded after the proceeding concluded. TELUS further requested a \$44,784 reduction in DWCC's award, framing the videos as non-essential expenses rather than accessibility tools. This line of objection revealed the persistent tension between corporate intervenors and community groups over the recognition of accessibility-related costs
- a. "The video costs should be disallowed because the videos were not on the public record and were uploaded only after the proceeding concluded."
— *TELUS Joint Objection* (Implied in CRTC Order, paraphrased from Telecom Order CRTC 2017-380)²⁷
 - b. "We request the Commission reduce DWCC's award by \$44,784 associated with video production." — *TELUS Joint Objection*²⁸
 - c. "Costs should be allocated based on wireless market share, not general TORs." — *TELUS*²⁹

²⁷ CRTC Telecom Order 2017-380, 25 October 2017 available at: <https://crtc.gc.ca/eng/archive/2017/2017-380.htm>

²⁸ TELUS Answer to DWCC Application for Final Costs, 18 April 2018 in CRTC archives as #DM#2873093 - Costs - TELUS - 170428 - Answer to DWCC Final Costs Application, 2018.

²⁹ TELUS, Response to DWCC, 2018

88. DWCC rejected these claims, stressing that the videos had been created at the Commission's own request and were indispensable accessibility tools, not optional add-ons.

DWCC Response

89. In its reply, DWCC emphasized that the ASL and LSQ videos were created at the direct request of CRTC staff to ensure Deaf community members could engage meaningfully in the proceeding. The organization stressed that these were not promotional materials but vital accessibility tools. DWCC also explained the technical setback of a hard drive crash, which required personal funds to recover files. To deny reimbursement on this basis, DWCC argued, would unfairly penalize Deaf consultants and undermine sign language accessibility:

- a. "The ASL and LSQ videos were requested by CRTC staff to help the Deaf community engage. They were **not promotional**, but accessibility tools." — DWCC³⁰
- b. "We faced a hard drive crash during production. We used personal funds to professionally recover the files and submit them late. Penalizing us for that would be cruel." — DWCC³¹
- c. "Failure to recognize video accessibility work disproportionately punishes Deaf consultants and sign language access efforts." — DWCC³²

90. The Commission's ruling in this case not only validated DWCC's position but also set a precedent on the recognition of sign-language accessibility work.

Commission Ultimate Determination

91. The Commission ultimately sided with DWCC, recognizing its mandate to provide a national Deaf-led perspective on wireless accessibility. In Telecom Order 2017-380, the CRTC confirmed that the ASL and LSQ videos were not promotional but essential accessibility tools that directly enabled participation. While the Commission noted that the video costs were significant, it concluded they were necessarily and reasonably incurred, subject only to proportional reductions for reasonableness. In doing so, the Commission affirmed the unique expertise DWCC brought to the proceeding and acknowledged the central role of

³⁰ DWCC, *Response to TELUS Answer regarding Costs*, TNC CRTC 2016-116, 24 May 2017, filed in CRTC Archives.

³¹ DWCC Response to TELUS Answer, 24 May 2017.

³² DWCC Response to TELUS Answer, 24 May 2017.

sign-language access in fulfilling its mandate:

- a. “The Commission recognizes that the DWCC was established to provide a national Deaf-led perspective on wireless telecommunications accessibility. Its mandate is to ensure that Deaf, Deaf-Blind, and Hard of Hearing Canadians can engage meaningfully in regulatory proceedings that directly affect their communication rights.”
— CRTC Telecom Order 2017-380³³
- b. “The participation of the DWCC in this proceeding provided unique accessibility expertise that would not otherwise have been before the Commission. Their contributions ensured that the lived realities of sign-language users were incorporated into the record.”
— CRTC Telecom Order 2017-380³⁴
- c. “The Commission does not accept the argument that the ASL and LSQ videos should be disallowed. These materials were created at the Commission’s request to enable Deaf community members to engage in the proceeding. They were not promotional, but accessibility tools that assisted participation.”
— CRTC Telecom Order 2017-380³⁵
- d. “The Commission finds that, although the costs claimed for the videos were significant, they contributed to accessibility in the proceeding. Accordingly, these costs are allowed, subject to proportional reductions for reasonableness.”
— CRTC Telecom Order 2017-380³⁶
- e. “The Commission determines that the revised amount of costs claimed by DWCC, as adjusted for reasonableness, was necessarily and reasonably incurred and should be allowed.”
— CRTC Telecom Order 2017-380³⁷

92. TNC 2016-293 thus underscored two central points: that accessibility tools such as ASL and LSQ videos are essential, not optional, and that the Commission was willing to affirm this principle even in the face of industry resistance. Yet these victories came only after repeated disputes and extensive work from a small,

³³ CRTC Telecom Order 2017-380, 25 October 2017 available at:

<https://crtc.gc.ca/eng/archive/2017/2017-380.htm>

³⁴ CRTC Telecom Order, 2017-380.

³⁵ CRTC Telecom Order, 2017-380.

³⁶ CRTC Telecom Order, 2017-380.

³⁷ CRTC Telecom Order, 2017-380.

community-based organization. This pattern, recognition from the Commission paired with persistent industry opposition, became a defining feature of DWCC's early cost application history.

Early Proceedings – Systemic Lessons

- 93.** Overall, DWCC remains grateful to the Canadian Radio-television and Telecommunications Commission (CRTC) for its patience in the early years of our participation, when we first appeared on the scene as a small, community-based group. The Commission took time to understand our role and, for the most part, supported our efforts through fair cost determinations. That recognition was critical to enabling DWCC and its partners to bring forward the accessibility lens that was otherwise missing from these proceedings.
- 94.** Yet the support of the Commission contrasted sharply with the conduct of telecommunications service providers. The objections repeatedly advanced by the telcos reflected an audist and oppressive posture toward accessibility groups, often dismissing or minimizing the legitimacy of our contributions. Such responses should never have been permitted on the public record, given the discriminatory assumptions they carried about Deaf and accessibility-focused organizations.
- 95.** In the present regulatory environment, under the Accessible Canada Act and the 2023 Policy Direction, such treatment cannot be justified. Accessibility is a right, not a negotiable feature, and regulatory proceedings must reflect that standard. While DWCC could pursue further remedies through formal complaints, the broader point is clear: the Commission's processes must actively protect equity-seeking groups and ensure accessibility is built into every aspect of participation.
- 96.** These early proceedings illustrate how DWCC's legitimacy and costs were subjected to a higher threshold of proof than that applied to other groups. Far from being resolved in the formative years, this pattern became entrenched, with subsequent proceedings repeating the same heightened scrutiny..

Later Proceedings – Intensified Systematic Scrutiny

- 97.** In subsequent years, DWCC's involvement in CRTC proceedings continued to attract an unusually high level of examination. Cost applications were frequently met with significant challenges and reductions, including:

 - a. Telecom Notice of Consultation 2017-33**, in which DWCC's claimed costs were reduced by approximately 200 hours of labour;

- b. **Telecom Notice of Consultation 2020-178**, involving a large team of 15 professionals and 30 mystery shoppers, which faced extensive questioning; and
- c. **Telecom Notice of Consultation 2021-102**, in which DWCC collaborated with multiple organizations, incorporated accessibility measures, and ensured Deaf-Blind participation, yet still faced intensive review.

Historical Affiliations and Early Scrutiny

98. When DWCC first began participating in CRTC proceedings, its eligibility for cost awards was subject to unusually detailed scrutiny from both telecommunications service providers and the Commission. Early proceedings generated repeated interrogatories aimed at clarifying DWCC's status, qualifications, and legitimacy as a cost applicant. One key focus was DWCC's relationship with the Canadian Association of the Deaf – Association des Sourds du Canada (**CAD-ASC**).
99. In formal responses, DWCC emphasized its independence. CAD-ASC's Board of Directors had no authority over DWCC's decisions or membership, and DWCC did not rely on CAD-ASC's operational resources. The only connection was limited administrative alignment, use of CAD-ASC's bank account line and mailing address. Both organizations stressed that the cost process should be applied flexibly for small charitable and community groups, which lack the resources to participate effectively without compensation.
100. It is important to note that this relationship is no longer in effect. In 2022, DWCC formally separated from CAD-ASC and has since operated as a fully independent entity. Historical scrutiny directed at DWCC during its earlier affiliation underscores the need for consistent treatment across community organizations, ensuring that present-day independence is reflected in the record.

Uneven Standards and Structural Bias

101. Despite DWCC's minimal reliance on CAD-ASC, the affiliation was treated as grounds for questioning DWCC's legitimacy—a level of scrutiny not applied to other Deaf, DeafBlind, and Hard of Hearing organizations such as the DHH Coalition, CDGM, or OVRSC. DWCC was compelled to provide governance clarifications that comparable groups were never asked to supply, creating an uneven standard. Such disparities suggest that smaller Deaf-led groups may face higher procedural barriers to cost recovery than more established organizations, raising questions of structural bias and alignment with the accessibility lens mandated by the **Accessible Canada Act** and the **Policy Directions**.
102. This pattern of heightened examination did not end with DWCC's early participation. Later proceedings, including **TNC 2017-33**, **TNC 2020-178**, and

TNC 2021-102, repeated the same protracted questioning and delays. Viewed alongside 2015-134, 2016-116, and 2016-293, the evidence shows that this approach was not confined to DWCC's formative years but became entrenched, reinforcing the perception that DWCC faced a higher threshold of proof than comparable organizations.

Verification of Consultant Start Dates

103. The Commission has also gone beyond reviewing hours and rates to directly probe the professional timelines of DWCC's consultants. In the costs application associated with **TNC CRTC 2017-33**, Commission staff issued a letter on 26 February 2018 requiring DWCC to confirm the exact date on which **Ms. Anderson-Kellett (Lisa Anderson)** began offering services as a consultant.

104. The Commission noted an inconsistency in DWCC's filing: in its *Form III – Summary of Consultant and Analyst Fees*, her start date was listed as **November 2008**, while another part of the application stated **January 2008**, which DWCC cited as the basis for claiming the senior consultant rate of \$225 per hour. Staff stressed that this discrepancy was material, since the **Guidelines for the Assessment of Costs** tie consultant categories to completed years of experience.

105. In response, DWCC conducted a historical review and secured **letters from senior members of the BC Video Relay Services Committee**, confirming that Ms. Anderson began providing consultant services on **12 June 2008**. This evidence resolved the discrepancy and established June 2008 as the verified start date for cost award purposes. At the same time, the Commission required DWCC to demonstrate that its costs application had been served on all parties, reminding the organization that future filings must include explicit proof of service.

106. This episode illustrates how the Commission not only scrutinized the substance of DWCC's claims but also required **documentary verification of consultant biographies and start dates** to determine the appropriate rate band. For a small community-based organization, such requests imposed an additional administrative burden, often requiring archival research and third-party confirmation.

Consistency in Application of Standards

107. DWCC has struggled to understand why its applications have been subjected to such heightened scrutiny when new public-interest groups appearing before the Commission have not faced comparable examination. Standards should be applied consistently across all applicants, including Deaf organizations, with equal requirements to provide biographies and supporting documents verifying consultant start dates. The inconsistent approach suggests that the Commission has, in some cases, applied a more lenient standard.

108. Detailed interrogatories from both the CRTC and telecommunications service providers demanded comprehensive responses, requiring considerable time and resources from small public-interest groups like DWCC, resources far more limited than those of industry participants.

Accountability, Fairness, and Consistency in Cost Awards

109. Given the rigorous scrutiny historically applied to DWCC's cost applications, it is of concern that, in *Telecom Notice of Consultation 2021-102*, the Commission appeared to extend greater leniency to certain public-interest groups with only intermittent participation histories. For example, the **Ontario Video Relay Service Committee (OVRSC)** was active between 2012 and 2014, during the proceedings related to the feasibility (TNC 2013-155)³⁸ and the establishment and structure of the CAV organization (TNC 2014-188)³⁹ as evidenced in their cost decisions by the CRTC, *Telecom Order CRTC 2014-244*⁴⁰, and *Telecom Order CRTC 2015-160*⁴¹ and did not appear again for more than seven years thereafter until *Telecom Notice of Consultation CRTC 2021-102*, "Review of accessibility cost support and related process improvements"⁴² and received a determination with their costs in *Telecom Order CRTC 2025-99*.⁴³
110. By contrast, DWCC has maintained an accessibility lens across multiple telecom and broadcasting proceedings since 2015, yet was treated the same as a group with sporadic participation. Equating long-standing commitment with occasional involvement undermines the value of consistent contributions from Deaf-led organizations.
111. This inconsistency conveys a lack of respect for organizations that have invested years of expertise and labour, while extending the same recognition to groups with outdated or intermittent engagement. Such treatment undermines the credibility of the cost award process and risks discouraging long-term community involvement.

³⁸ CRTC, *Telecom Notice of Consultation CRTC 2013-155*, "Issues related to the feasibility of establishing a Video Relay Service," 2013. Available at: <https://crtc.gc.ca/eng/archive/2013/2013-155.htm>

³⁹ CRTC, *Telecom Notice of Consultation CRTC 2014-188*, "Framework for Video Relay Service," 2014. Available at: <https://crtc.gc.ca/eng/archive/2014/2014-188.htm>

⁴⁰ CRTC, *Telecom Order CRTC 2014-244*, "Determination of costs award with respect to the participation of the Ontario Video Relay Service Committee in the proceeding initiated by Telecom Notice of Consultation 2013-155," 20 May 2014. Available at: <https://crtc.gc.ca/eng/archive/2014/2014-244.htm>

⁴¹ CRTC, *Telecom Order CRTC 2015-160*, "Determination of costs award with respect to the participation of the Ontario Video Relay Service Committee in the proceeding initiated by Telecom Notice of Consultation 2014-188," 2015. Available at: <https://crtc.gc.ca/eng/archive/2015/2015-160.htm>

⁴² CRTC, *Telecom Notice of Consultation CRTC 2021-102*, "Review of accessibility cost support and related process improvements," 2021. Available at: <https://crtc.gc.ca/eng/archive/2021/2021-102.htm>

⁴³ CRTC, *Telecom Order CRTC 2025-99*, "Determination of costs award with respect to the participation of the Ontario Video Relay Services Committee — Comité Ontarien des Services de Relais Vidéo in the proceeding initiated by Telecom Notice of Consultation 2021-102," 2025. Available at: <https://crtc.gc.ca/eng/archive/2025/2025-99.htm>

- 112.** The *Guidelines for the Assessment of Costs*⁴⁴ state that “the hourly rate applicable to a particular consultant or analyst will be based on the number of completed years that person has been acting as consultant or analyst. Years shall be calculated as at the date of the commencement of the proceeding.”⁴⁵ Rate eligibility should be grounded in current and extensive experience, not sporadic appearances. Intermittent participation, interspersed with multi-year gaps, does not meet this standard.
- 113.** DWCC respectfully submits that the Commission should reinstate and enforce the requirement for cost applicants to declare consultant start dates. This measure would ensure that rates are assessed on the basis of both relevant experience and continuity of engagement. Absent such accountability, there is a risk of inflated rate claims, diminished integrity in the cost award process, and erosion of the principle that public funds should support active, credible, and sustained participation.
- 114.** The concerns outlined above regarding fairness in consultant rates connect directly to broader issues raised throughout the interview process. Participants emphasized that rate structures cannot be considered in isolation: they are part of a larger framework that determines who can participate, how contributions are valued, and whether accessibility is meaningfully embedded in regulatory practice.
- 115.** Building on these concerns, the next section of this report turns to the qualitative evidence gathered through interviews. These testimonies shed light on the lived realities of applying the CRTC’s cost framework, highlighting the burdens, inequities, and systemic barriers that persist despite years of community engagement. The insights provide context for why reforms to the cost structure, including the introduction of merit-based rates, are necessary to support equitable and sustainable participation.
- 116.** The link between consultant rates and broader accessibility issues is clear: fairness in compensation cannot be separated from the overall design of the cost application process. Interviewees consistently tied their experiences with rates to deeper challenges such as literacy barriers, unclear instructions, inequitable recognition of accessibility costs, and delays in reimbursement. The qualitative evidence that follows illustrates these systemic problems in detail, beginning with perspectives from seasoned consultants whose long involvement with the CRTC provides important historical context.
- 117.** At the same time, interviewees stressed that fairness is not just about recognition of costs or appropriate rates, it is also about when reimbursements are delivered. The question of fairness is not limited to how costs are challenged

⁴⁴ CRTC, *Guidelines for the Assessment of Costs*, Broadcasting Regulatory Policy CRTC 2010-963 and Telecom Regulatory Policy CRTC 2010-963, para. 13–15 (on consultant rates, criteria, and requirement to demonstrate experience).

⁴⁵ CRTC, *Guidelines for the Assessment of Costs*, Broadcasting Regulatory Policy CRTC 2010-963 and Telecom Regulatory Policy CRTC 2010-963, para. 13–15 (on consultant rates, criteria, and requirement to demonstrate experience).

or characterized; it extends equally to the timing of reimbursements. Recognition alone is insufficient if payment is delayed for months. For smaller, equity-seeking groups, these delays create a parallel barrier that threatens their capacity to participate on equal footing with industry players.

118. This leads naturally into the next area of analysis: timeliness. Beyond fairness in consultant rates, timeliness has emerged as an equally decisive factor. When reimbursements arrive unpredictably, the financial strain compounds existing inequities and erodes sustainability.

119. At the same time, interviewees stressed that fairness is not just about recognition of costs or appropriate rates—it is also about when reimbursements are delivered. The question of fairness is not limited to how costs are challenged or characterized; it extends equally to the timing of reimbursements. Recognition alone is insufficient if payment is delayed for months. For smaller, equity-seeking groups, these delays create a parallel barrier that threatens their capacity to participate on equal footing with industry players.

120. Historically, with the number of proceedings DWCC has participated in over the past decade, on average, the time between application and issuance of a cost decision has been approximately **8.9 months**, with a **median of 9.0 months**, ranging from as **short as 1.0 month** (BNC 2025-48) to as **long as 18.0 months** (BTNC 2020-81), a spread of 17 months that highlights the inconsistency and unpredictability of the current process. For community groups, these delays create real barriers: while industry players can absorb long waits, equity-seeking organizations are left carrying financial risk, uncertain whether the costs of their participation will ever be recovered. Full Infographics listing all of the cost applications submitted and the wait times are found in [Appendix A](#).

Delays with Cost Payments

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

Overall Distribution

121. The table shows that DWCC’s cost applications have waited anywhere between **1.0 month and 18.0 months** for decisions. The **average wait time is**

8.9 months, and the **median is 9.0 months**. This indicates that half of the decisions were made within about nine months, while the other half extended beyond that, with some significantly longer delays.

Longest Delays

- 122.** The longest delay recorded was **8.0 months** (BTNC 2020-81), with other protracted waits including **17.5 months** (TNC 2021-102), **15.5 months** (TNC 2022-65), and **11.5 months** (TNC 2016-116). These multi-year-scale delays highlight how unpredictable the system can be, particularly since such long waits are not rare outliers but part of a recurring pattern.

Shortest Delays

- 123.** The fastest decisions were **1.0 month** (BNC 2025-48) and **1.5 months** (BNC 2024-288), followed by **2.0 months** (BNC 2024-137) and **3.5 months** (TNC 2025-20). These short turnarounds demonstrate that expedited processes are possible, though inconsistently applied.

Middle Ground

- 124.** A large cluster of decisions fell in the **6–11 month range**, with many cases sitting at **10 months exactly** (TNC 2015-134, TNC 2020-178, TNC 2023-39). This “middle zone” represents the most typical experience for DWCC, yet it still forces equity-seeking groups to **shoulder nearly a year of financial risk before costs are recovered**.

Spread and Implications

- 125.** The spread is **17 months (18.0 – 1.0)**, a wide variance that reflects systemic inconsistency rather than a stable or predictable process. For organizations like DWCC, this uncertainty can deter participation in CRTC proceedings, as the timing of cost recovery is impossible to anticipate and directly impacts cash flow. By contrast, industry players with deeper resources can absorb such delays, creating a structural imbalance in the system.
- 126.** The statistical record of delays captures the scope of the problem, but it is through lived testimony that the full human impact becomes clear. Consultants describe the strain of waiting months, sometimes more than a year, for reimbursement, and the uncertainty this creates for small organizations operating without financial reserves. Their voices underscore how delayed payments translate into real barriers on the ground.
- 127.** Under the **Accessible Canada Act**, the CRTC has a clear responsibility to ensure accessibility is built into its processes; failing to reform cost recovery timelines risks leaving equity-seeking groups shut out of full participation, in direct contradiction to the Act’s mandate of barrier removal.

Observations on DWCC's Participation and Treatment in Cost Applications

- 128.** The following section situates DWCC's experience within this broader context, showing how systemic inequities become concrete in the organization's day-to-day interactions with the Commission. Unlike industry participants with salaried legal teams, DWCC's contributions come from a public-interest group representing its own members on a largely voluntary basis. The expectation to produce highly technical responses, while also defending accessibility-related costs against repeated objections, reflects not only a structural imbalance but also what many perceive as targeted and audist scrutiny. This dynamic has created a chilling effect on participation, forcing DDBHH organizations to devote disproportionate time and energy simply to defend their right to be heard.
- 129.** Heightened scrutiny of DWCC undermined the ability of smaller, Deaf-led organizations to contribute fully to Commission proceedings. This risked excluding key lived-experience perspectives at the very heart of accessibility policy-making. Unequal treatment between DWCC and other groups raised concerns of fairness, transparency, and procedural equity in the Commission's cost award process. Because standards were not applied consistently, credibility in the process may have been weakened. As Jeffrey Beatty noted, *"Consultant rates undervalue public-interest expertise compared to corporate lawyers, creating inequities for non-profit organizations and grassroots advocates."* There was a regulatory inconsistency.
- 130.** It should be emphasized that much of DWCC's participation in responding to RFIs has been carried out on a voluntary basis during evenings, weekends, and other unpaid personal hours. Members have been required to balance this highly technical and time-sensitive work alongside regular employment, creating significant strain compared to industry participants with dedicated legal and regulatory staff.
- 131.** The inequity became more pronounced in TNC 2021-102, when DWCC, CNSDB, and DBPC discovered that their attempt to claim RFI response hours was denied. This decision came despite encouragement from industry actors and other public-interest groups to seek recognition of this work. The denial forced DWCC et al. to file Review and Vary applications to challenge the outcome, deepening concerns about fairness and sustainability of participation.
- 132.** DWCC has filed and supported such Review and Vary applications, but the process itself is highly legalistic, resource-intensive, and inaccessible for small public-interest groups with limited budgets. Preparing these filings consumes scarce volunteer time, while the CRTC's own systems compound the challenge: Review and Vary applications are difficult to locate, not linked to their associated proceedings, and lack simplified file numbers. This lack of transparency makes the process unnecessarily tedious. An improved system, such as integrating Review and Vary materials into Part 1 application listings, would enhance accessibility and reduce barriers for equity-seeking organizations.

133. The imbalance is not limited to the overall workload; it also extends into how the Commission structures its timelines. Procedural requirements that may be manageable for industry players with dedicated staff can create disproportionate challenges for public-interest groups operating on volunteer or part-time capacity. This becomes especially visible when deadlines intersect with holidays or extended breaks, compounding the strain on organizations like DWCC.

Holidays and Vacations – Accessibility and Fairness Concerns

134. Public interest groups, including accessibility organizations such as the Deaf Wireless Canada Consultative Committee (DWCC), face repeated challenges when regulatory deadlines fall immediately after statutory holidays or long breaks. Examples include deadlines scheduled the day after Thanksgiving, mid-November, such as November 12, or in early January, such as January 8.
135. This pattern places an undue burden on community-based organizations, as it effectively requires consultants and volunteers to spend the holiday season working on complex regulatory filings while CRTC staff and industry participants are able to take extended breaks. The imbalance creates an unhealthy dynamic that fosters burnout and undermines the principle of meaningful participation.
136. DWCC recommends that the CRTC implement protected “quiet periods” in its annual calendar:
1. **One month in August:** A designated recess where no filing deadlines are scheduled, ensuring that all public interest groups have access to a dedicated period of rest.
 2. **Christmas/New Year period:** No deadlines should fall between December 20 and January 10, recognizing the importance of time spent with family during the holidays and the need for a fair recovery period at the start of the year.
 3. This approach should also extend to family-oriented holidays such as **Family Day (February)**, **Easter long weekends (March/April)**, as well as the days immediately following **Labour Day (September)**. Especially when the week after Labor Day, everyone is adjusting to a new school or college schedule for students, children, or educational staff.
137. By avoiding deadlines during these critical periods, the CRTC would ensure that public-interest groups are respected and have equitable access to a dedicated period of respite and vacation, without the risk of missing critical deadlines or leaving their communities unrepresented in regulatory proceedings.

- 138.** Further, delays in cost award payouts compound this problem. Public interest groups often find themselves waiting weeks or months for payment because the designated contacts within telecom companies are on extended vacation, sometimes three weeks to a month in August, with no alternate contact provided. Public interest groups are aware of this simply because of the automatic responses received on emails sent to the companies. This creates serious cash flow challenges and adds unnecessary stress for groups already operating with limited resources.
- 139.** To ensure fairness and prevent systemic burnout, DWCC urges the Commission to:
1. Avoid scheduling major deadlines immediately after statutory holidays.
 2. Establish a one-month quiet period in August each year for all public proceedings.
 3. Require telecom companies to designate alternate contacts for cost award payouts to ensure continuity during vacations.
- 140.** Without these measures, the current approach risks excluding accessibility groups and their communities from regulatory processes that directly affect them. This is why reforms to simplify applications, set clear service standards, and guarantee faster reimbursement timelines are essential, without them, community groups face unsustainable strain, and the principle of equitable participation becomes an empty promise.
- 141.** The variance in decision timelines underscores how systemic inconsistency can translate into practical challenges for organizations seeking cost recovery. To better understand the impact of these dynamics, interview responses were gathered from consultants and accessibility advocates. Their perspectives highlight how procedural delays and heightened scrutiny influence DWCC's participation, offering insight into the broader implications for equity-seeking groups within the Commission's processes.
- 142.** These patterns in decision timelines are more than abstract numbers; they translate into lived consequences for community-based organizations. The following section turns from statistical evidence to first-hand accounts from consultants, whose experiences reveal how unpredictable cost recovery directly affects the capacity of accessibility-focused groups to engage in Commission proceedings.

Beyond the Numbers – Lived Realities of Cost Recovery

- 143.** To understand how systemic inconsistencies translate into lived consequences, this report now turns to qualitative evidence gathered through interviews. These testimonies reveal the burdens, inequities, and systemic barriers that persist despite years of community engagement. They also explain why reforms to the cost framework, including merit-based rates, simplified applications, clear service standards, and faster reimbursement timelines, are necessary to support equitable and sustainable participation.
- 144.** These experiences set the stage for the interview findings that follow, where members describe in greater detail the impact of such decisions on their ability to sustain meaningful participation. The following profiles introduce each interviewee and situate their testimony within the broader evidence base of this report. The insights provide context for why reforms to the cost structure, including the introduction of merit-based rates, are necessary to support equitable and sustainable participation.

Interview Evidence and Analysis - Lived Realities of the Cost Application Process

- 145.** To ground this analysis in real-world experience, the report draws on the insights of six consultants who have engaged directly with the CRTC's cost application process. Their perspectives highlight how procedural delays and heightened scrutiny influence DWCC's participation, offering insight into the broader implications for equity-seeking groups within the Commission's processes.
- 146.** Collectively, these testimonies reveal that the challenges with consultant rates, reimbursement timelines, and recognition of accessibility costs are not isolated incidents but systemic flaws in the Commission's framework. The lived realities described by consultants underscore the human cost of these procedural inequities, making clear that the barriers are not abstract but deeply felt. Addressing them requires reforms that are both structural and practical: simpler applications, clearer standards, merit-based rates, and timely reimbursement. Without these changes, the principle of equitable participation remains out of reach, and equity-seeking groups will continue to struggle to participate on equal footing with industry actors.

Profile of Interviewees

- 147. James Roots** is a veteran Deaf consultant with decades of experience in CRTC proceedings on accessibility and cost applications in his former role as Executive Director of the Canadian Association of the Deaf-Association des

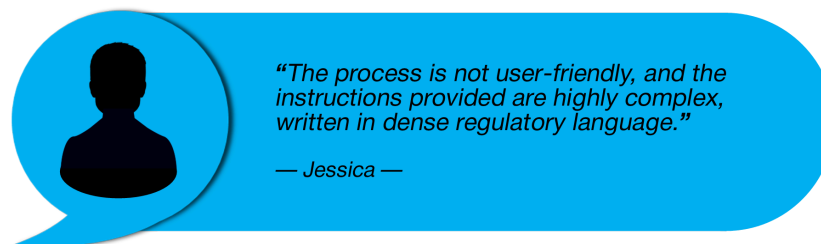
Sourds du Canada (CAD-ASC). His perspective underscores systemic inequities in the cost process, from literacy barriers to inconsistent recognition of accessibility expenses.

- 148. Jeffrey Beatty** is Chairperson of the Deaf Wireless Canada Consultative Committee (DWCC) and has overseen cost applications since 2015. His perspective emphasizes the burdens of documentation, the uncertainty around accessibility expenses, and the financial risks posed by delayed reimbursements.
- 149. Senior consultant** has participated in CRTC proceedings as an individual activist, in-house advisor, and freelance consultant, bringing varied perspectives to the cost application process. They highlight challenges with complex instructions, unclear treatment of accessibility expenses, and the need for greater transparency and fairness in cost awards.
- 150. Jessica Sergeant** brings the perspective of a newer consultant navigating the CRTC's complex cost framework, as she was assigned a part of the cost application writing team to assist in organizing the multiple people from multi organizations. She stresses the need for clear instructions, recognition of accessibility costs, and a merit-based rate system that values lived experience.
- 151. Leanor Vlug**, a member of the **Deaf-Blind Planning Committee (DBPC)** in TNC CRTC 2021-102, has graduate-level training and experience in accessibility policy, yet still found the CRTC's forms inaccessible without peer guidance. She identified the lack of ASL/LSQ resources and repeated challenges to reported hours as key barriers.
- 152. Terri Nolt**, Chair of the DBPC and herself Deaf-Blind, participated in the cost award process for the first time and encountered steep barriers due to complex language and inaccessible formats. With ASL support, she highlighted how Deaf-Blind participants are especially disadvantaged by digital platforms and unclear instructions, often relying on spreadsheets and manual workarounds to compile documentation.
- 153.** As newer participants in the cost award process, **both Leanor and Terri** described being overwhelmed by the complexity of the forms, relying heavily on peer mentors to guide them through the steps, and struggling with formats that were not screen-reader friendly. Their experiences reinforce that the current process places disproportionate burdens on Deaf, DeafBlind, and Hard of Hearing (DDBHH) groups—burdens that industry actors with paid staff and dedicated resources do not face.
- 154.** The interviewee profiles not only provide personal context but also reveal striking commonalities. Across differences in experience, role, and organizational affiliation, participants identified recurring obstacles in the CRTC's cost application framework, ranging from inaccessible forms and unclear rules on eligibility to inconsistent recognition of accessibility expenses and lengthy

reimbursement delays. These shared experiences point to systemic challenges that extend beyond individual cases, shaping how equity-seeking groups can participate in Commission proceedings.

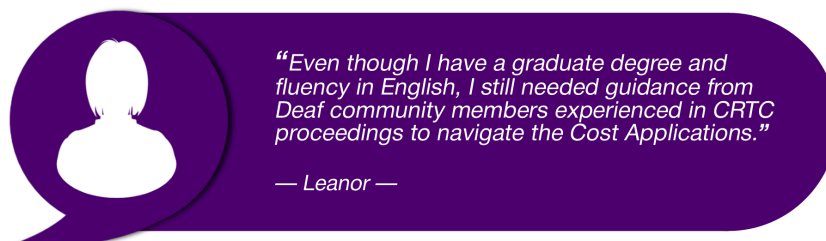
- 155.** Building on these narratives, the analysis that follows examines how DWCC's own treatment within the cost application process exemplifies these broader patterns. By comparing the lived realities of community representatives to the advantages afforded to industry participants, clear patterns of imbalance emerge, highlighting not only the technical and administrative burdens imposed on DWCC but also the deeper implications for accessibility, equity, and fairness in regulatory participation.

General Perceptions of Burden and Complexity



- 156.** Across all six interviews, participants described the CRTC cost application process as unnecessarily burdensome and complex. The forms and instructions were consistently characterized as dense, legalistic, and intimidating, designed in a way that seemed better suited to large organizations with legal staff than to community-based groups or individual consultants. Even those with years of experience reported that navigating the requirements was time-consuming and stressful, often diverting energy away from substantive policy work. For newer participants, the process felt overwhelming from the outset, with unclear terminology, inaccessible formats, and little practical guidance on how to complete the applications. Taken together, these perceptions reinforce the view that the framework is not user-friendly and creates systemic barriers to meaningful participation by Deaf, DeafBlind, and Hard of Hearing (DDBHH) organizations.

Role & General Experience

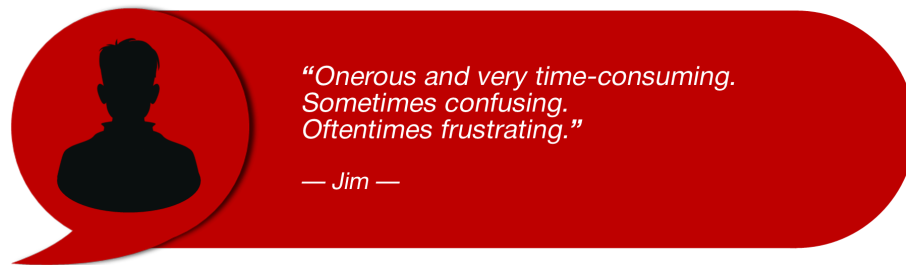


- 157.** The general burdens identified by participants become especially visible when focusing on two critical aspects of the process: the clarity of the Commission’s instructions and the recognition of accessibility-related expenses. These areas reveal how systemic barriers are embedded not only in procedure but in the very design of the cost application framework.
- 158.** These perceptions of burden and complexity were further reflected in how participants described their own roles and experiences with the cost application process. From seasoned leaders who have managed filings across multiple proceedings to newcomers navigating unfamiliar terminology for the first time, their testimonies illustrate the steep learning curve and the uneven demands placed on community-based organizations. The following perspectives highlight the range of experiences—from coordination and compliance at an organizational level to the personal challenges of understanding dense regulatory language without adequate support. To give a sampling of the profiles of the roles of the people when doing the cost application, we begin with three peoples’ descriptions of their roles, some which begin to delve into the challenges they faced in this phase of participating in the proceedings.
- 159.** As Chairperson of the Deaf Wireless Canada Consultative Committee (DWCC), **Jeffrey Beatty** has been preparing and managing cost applications since 2015, covering multiple proceedings in both broadcasting and telecommunications. In this role, he has overseen the tracking of hours, the categorization of expenses such as professional fees, disbursements, and accessibility supports, and the preparation of final filings in compliance with CRTC requirements. He has also served as the primary liaison with both the Commission and industry stakeholders throughout these processes.
- 160. Senior Consultant** – “Based on my experiences participating in CRTC proceedings as an individual activist, in-house consultant, and freelance consultant, I have encountered several challenges in navigating the CRTC cost application process.”
- 161. Leanor Vlug** emphasized that even with strong academic credentials—a graduate degree in education and fluency in English, the CRTC cost application process remained daunting without the guidance of experienced Deaf community members. She noted that peer support from those familiar with Commission procedures was essential to navigate the technical language and requirements, underscoring how inaccessible the process would be for individuals without such networks of assistance. Furthermore, she emphasized “...without guidance from Deaf community members experienced in CRTC proceedings and Cost Applications, it would have been even more challenging than it was.”
- 162. Terri Nolt** further explains her first-hand experience with her first cost application experience: “It was a completely new experience for me. I didn’t know

many of the words (high-level English) and was not familiar with the industry and regulatory process. I had to learn the rules and understand how things were supposed to be done. I needed to have everything explained to me in ASL and sometimes summarized in easier English.”

- 163.** Viewed collectively, these profiles provide more than individual stories. They reveal recurring themes across diverse experiences, pointing to systemic flaws in how the framework treats accessibility-focused organizations. The next section distills these shared insights into broader findings that highlight structural inequities in the cost application process.

Overall Experience and Process Burden



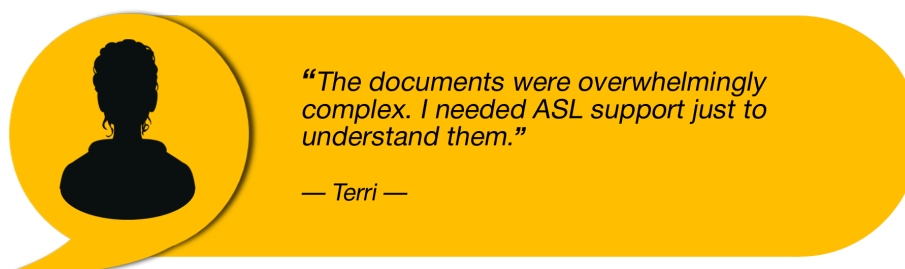
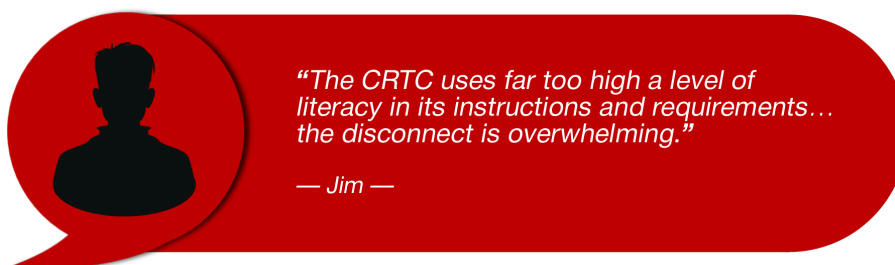
- 164.** Across all six interviews, participants described the CRTC cost application process as unnecessarily burdensome and stressful. The complexity of the forms, the dense legal language, and the detailed compliance requirements created significant barriers, particularly for smaller, community-based organizations without dedicated legal staff. Even seasoned consultants reported that navigating the system was time-consuming and frustrating, while newer participants described the process as overwhelming and intimidating from the outset.
- 165.** One experienced consultant summarized the process as “onerous and very time-consuming. Sometimes confusing. Oftentimes frustrating” (James Roots). He went on to describe the stress of responding to challenges from telecommunications companies, which left him “feeling disrespected” and feelings of “anger” and feeling unwilling to continue participating.
- 166.** A senior consultant echoed these concerns, noting that “the legal language in CRTC instructions and requirements is overly complex and difficult to follow” and that the absence of accessible formats such as ASL/LSQ or visual guides such as infographics compounded the burden.

- 167.** From an organizational perspective, Jeffrey Beatty highlighted the administratively heavy the process remains: “The process is structured but administratively burdensome. It “requires careful compliance with Commission guidelines.” For smaller accessibility-focused organizations like DWCC, the level of detail and documentation required diverts energy away from substantive policy work.”
- 168.** For newer participants, the barriers were especially steep. As Jessica Sergeant explained, “The accessibility of the CRTC’s cost application forms and process with the telcos has been frustrating, challenging, and time-consuming. The process is not user-friendly, and the instructions provided are highly complex, written in dense regulatory language that assumes a level of legal or procedural expertise that many applicants simply do not have.”
- 169.** Several interviewees emphasized that the cost application process is not only complex but actively discouraging to smaller organizations. The detailed forms, legalistic language, and lack of accessible guidance were repeatedly identified as barriers that diverted time away from substantive policy work.
- 170.** As Jessica Sergeant observed, *“In practice, the complexity and opacity of the process act as a deterrent. It gives the impression that the process may be deliberately designed to limit access to cost recovery, discouraging participation from smaller or less-resourced public interest organizations.”* Her comments underscore a broader concern raised across interviews: that the structure of the process itself may have the effect, intended or not, of filtering out equity-seeking groups and reinforcing the dominance of better-funded industry players.
- 171.** Taken together, these testimonies reinforce that the cost application framework not only imposes a disproportionate administrative burden but also discourages sustained participation by equity-seeking groups. This broader pattern of inaccessibility leads directly into the documentation and transparency issues raised by participants in the next section.
- 172.** The general burdens identified by participants become especially visible when focusing on two critical aspects of the process: the clarity of the Commission’s instructions and the recognition of accessibility-related expenses. These areas reveal how systemic barriers are embedded not only in procedure but in the very design of the cost application framework.

Language and Clarity of Instructions with Recognition of Accessibility Costs

- 173.** Participants consistently described the CRTC’s cost application instructions as inaccessible, overly complex, and poorly designed for equity-seeking groups. Several noted that the so-called “plain language” materials were written at a literacy level well above that of most Canadians, effectively excluding many community members from independent participation.
- 174.** The website and application forms were viewed as oriented toward corporate audiences, with dense text, unfamiliar terminology, and formatting that lacked clarity or visual guidance. For Deaf and Deaf-Blind participants, the absence of ASL/LSQ versions, small font sizes, and the need to rely on peers for explanation further compounded the burden.
- 175.** Even highly educated participants reported struggling without mentorship from those already familiar with CRTC processes. Taken together, these experiences point to a systemic gap: the Commission’s instructions are neither accessible nor inclusive, requiring significant additional effort from community-based organizations simply to navigate the process.

Instructions & Clarity



- 176.** Participants described the Commission’s instructions as dense, legalistic, and inaccessible for many community members. The materials were written at a literacy level too high for broad public use, lacked visual checklists or roadmaps, and often required peer support or translation into ASL/LSQ to be understood.

Even highly educated individuals found the process overwhelming without prior experience, highlighting how the current approach privileges corporate stakeholders over grassroots or equity-seeking groups.

- 177.** Despite claims of using “plain language,” interviewees emphasized that the Commission’s instructions are pitched at a literacy level far beyond what many Canadians can reasonably navigate. As James Roots explained, *“The CRTC uses far too high a level of literacy in its instructions and requirements... the so-called ‘plain language’ is actually Grade 10 literacy level, whereas some two-thirds of the Canadian populace read at a Grade 5 or 6 literacy level, and people with language disabilities... average a Grade 3 literacy level. The disconnect is overwhelming.”* This gap makes the process inaccessible not just for equity-seeking groups, but for a broad segment of the population.
- 178.** The problem is compounded by the way the Commission’s online materials are presented. One consultant observed that *“the CRTC website appears to be designed with a corporate audience in mind, rather than being user-friendly for individual consumers or grassroots participants.”* By privileging technical detail over clarity, the Commission’s platform reinforces the impression that the process is built for industry insiders rather than for community-based organizations or individuals trying to participate.
- 179.** These barriers are especially acute for those without formal academic training or for whom English or French is a second language. As another consultant noted, *“Several issues with the Commission’s instructions and requirements create barriers for individual and grassroots participants... particularly those without an academic background or for whom English or French is a second language.”* Taken together, these accounts underscore that the Commission’s instructions fail the accessibility test at multiple levels: literacy, format, and inclusivity.
- 180.** The design and structure of the cost application forms themselves were identified as a major barrier. Jessica Sergeant explained that *“the structure and layout of the CRTC cost applications were unclear and at times overwhelming. Key information was buried within dense text, making it difficult to quickly identify what was required for each section.”* For participants, this lack of clarity did not simply slow the process—it created unnecessary uncertainty about whether applications were being completed correctly.
- 181.** This confusion was compounded by the absence of basic navigational tools such as checklists or visual roadmaps. As Sergeant further observed, *“The absence of a clear checklist or visual roadmap added to the confusion, and*

navigating between different documents and sections led to uncertainty about whether the application was complete or compliant." Without these supports, even experienced participants found themselves second-guessing their filings, while newer applicants risked omissions that could jeopardize reimbursement.

182. Leonor Vlug highlighted the additional burden created by the lack of accessible resources from the Commission itself. *"The process took longer due to the lack of accessible resources from the CRTC itself. As a consequence, we had to spend more time instructing the newer team members and delegating the collection of hours worked, expenses, and other assignments to those who had more experience."* This need to redistribute tasks and provide peer support reflects how the shortcomings of CRTC's materials shift the responsibility for accessibility onto community organizations rather than the regulator.

183. For newcomers to the process, the sheer complexity of the documents created an immediate barrier. Terri Nolt reflected that *"the documents were overwhelmingly complex. I needed to have other Deaf team members explain them to me. These team members did the work on their own time or as part of their recorded timesheets in providing accessibility support."* Her experience illustrates how the lack of accessible design shifts the burden onto peers, requiring them to step in as informal interpreters of the process.

184. Beyond the overall complexity, the language itself was a source of exclusion. Nolt explained that *"the forms were in a high-level English, including words I had not seen before, or were used in a different way than I was familiar with."* For many Deaf participants, this kind of unfamiliar technical English demands additional explanation in ASL, further lengthening the process and raising the risk of misunderstanding key instructions.

185. Even basic formatting choices added to the accessibility challenges. As Nolt observed, *"No, the forms were not accessible. The font sizes were too small, and there were terms (words) that I was not familiar with – these terms and words had to be explained to me in ASL."* The absence of plain language, larger fonts, and integrated ASL/LSQ versions meant that simple design flaws compounded the already significant literacy barriers built into the process.

186. Both Terri Nolt and Leonor Vlug emphasized that the inaccessibility of the instructions extended well beyond individual difficulty to a systemic exclusion of entire communities. They noted that *"[instructions] were not in an accessible level for most Deaf and Deaf-Blind community members. Nor were the instructions in*

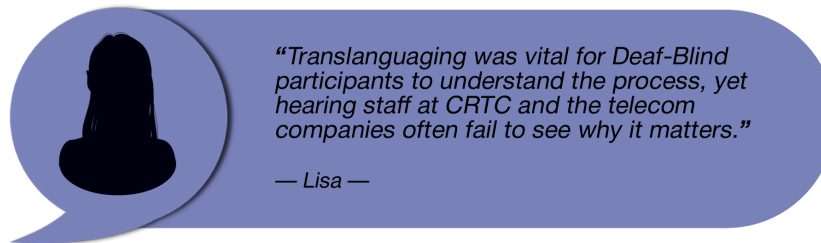
our Primary languages of ASL / LSQ.” This gap meant that Deaf and Deaf-Blind participants were forced to rely on ad hoc supports rather than having equal access built into the process.

187. Their shared perspective highlights how the absence of ASL and LSQ versions is not simply a design flaw but a fundamental barrier to participation that undermines the Commission’s commitment to accessibility.

Guidance on Accessibility Expenses

188. The lack of clarity was not limited to instructions on completing the forms; it also extended to guidance on how to properly claim accessibility-related expenses. As Terri Nolt and Leanor Vlug explained, *“We do not recall seeing any description or ‘caution’ in how to include accessibility related expenses or disbursements. CRTC needs to do better in providing Proceeding AND Cost-Application information. Generally, Canada needs to improve how government-related and regulatory information is provided.”* Their perspective illustrates how the absence of explicit direction leaves accessibility costs in a grey zone, forcing organizations to guess how to categorize essential supports, an issue that forms the basis of the following discussion on accessibility costs.

Accessibility Costs





"Accessibility services are not optional. They are essential components that allow equal participation."

— Jessica —



"Accessibility work is treated as an 'extra' rather than a recognized necessity."

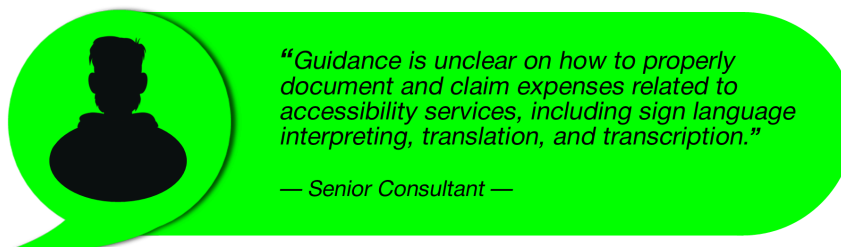
— Jeff —

- 189.** Participants emphasized that one of the most persistent gaps in the cost application framework is the treatment of accessibility-related expenses. Jeffrey Beatty noted that while the overall instructions appeared straightforward, *"there was ambiguity regarding accessibility-related costs. The framework does not explicitly identify these as recoverable, leaving applicants to argue eligibility each time."* This lack of explicit recognition means that accessibility supports, which are fundamental to enabling participation, are often treated as optional add-ons rather than integral requirements.
- 190.** The consequences of this ambiguity are felt directly by community groups who must defend their claims more rigorously than other intervenors. As Beatty explained, *"Accessibility costs remain in a grey area. While they are essential to enable DDBHH participation, the rules are not explicit in guaranteeing eligibility. This often requires us to over-explain or provide additional justification."* Instead of streamlining participation, the current framework burdens equity-seeking groups with additional layers of justification, reinforcing inequities and discouraging sustained involvement in regulatory proceedings.
- 191.** There were barriers to equitable participation: Heightened scrutiny of DWCC undermined the ability of smaller, Deaf-led organizations to contribute fully to Commission proceedings. This risked excluding key lived-experience perspectives at the very heart of accessibility policy-making. As Lisa Anderson observed, *"Translanguaging was vital for Deaf-Blind participants to understand the process, yet hearing staff at the CRTC and in the telecom companies often fail to see why it matters."*

- 192.** Taken together, Jeffrey Beatty's observations about the ambiguity of accessibility costs and Jessica Sergeant's experience of having to force those costs into an "other" category reinforce a common theme: accessibility is treated as incidental
- 193.** The ambiguity surrounding accessibility expenses is not just theoretical, it has direct, practical impacts on how applications must be prepared. Jessica Sergeant explained that *"there were no accessibility-related disbursements or costs on the cost application, as these expenses are not currently eligible under the existing guidelines. In order to account for these supports, an 'other' category had to be added specifically to reflect accessibility-related costs."* By forcing applicants to use a catch-all "other" box, the framework signals that accessibility supports are peripheral rather than recognized necessities.
- 194.** Sergeant further underscored the inequity of this treatment, stressing that *"accessibility services are not optional. They are essential components that allow individuals and communities who are DDBHH to participate in CRTC proceedings on an equal footing."* Her remarks highlight the disconnect between the Commission's stated commitment to inclusion and the lived reality of organizations that must justify the very supports that make participation possible. Without explicit recognition, accessibility remains vulnerable to challenge and reduction, undermining both fairness and compliance with the Accessible Canada Act.
- 195.** Jeffrey Beatty emphasized that the current cost framework sends a troubling message about the value of accessibility. He explained that *"accessibility work is treated as an 'extra' rather than a recognized necessity. This inequity forces accessibility groups to expend more effort than other intervenors just to justify their participation needs."* Instead of embedding accessibility as a baseline requirement, the process effectively penalizes those who must rely on it, creating additional hurdles for equity-seeking groups.
- 196.** This theme recurred throughout his testimony, as Beatty noted that *"accessibility-related work is not explicitly recognized or streamlined in the process. Instead, it is treated as an 'extra' that must be justified."* By placing accessibility supports in a separate, contested category, the framework treats them as discretionary rather than integral. This not only burdens applicants but undermines the very principle of equal access that the Accessible Canada Act is meant to enshrine.

197. James Roots highlighted that accessibility costs have long been poorly understood by both the Commission and industry parties. Reflecting on past applications, he explained that *“the Commission and the ‘parties’ did not always understand our accessibility and accommodation costs, and we struggled to understand why we couldn’t claim for some costs such as Deaf Interpreters... they didn’t comprehend their role.”* His experience illustrates how the lack of recognition for certain supports left organizations uncertain about what could be claimed and forced them to repeatedly justify essential accommodations.
198. This problem was not confined to cost applications but extended to the hearings themselves. Roots recalled “the Commission’s refusal to provide full interpretation for all of the public hearings,” an apparent reference to the early stages of DWCC’s participation in 2015. Such refusals underscored how accessibility was often treated as expendable rather than fundamental, placing Deaf and Deaf-Blind participants at a systemic disadvantage. His remarks demonstrate that the failure to explicitly recognize accessibility costs and support is part of a longer pattern of inequity in CRTC processes.
199. Across interviews, participants were unanimous in their concern that accessibility costs remain treated as incidental rather than essential. Jessica Sergeant described being forced to fit these expenses into an “other” category, while Jeffrey Beatty stressed that *“accessibility work is treated as an ‘extra’ rather than a recognized necessity,”* requiring greater justification than other costs. James Roots added that even basic supports, such as Deaf Interpreters, were once deemed ineligible, and early hearings lacked full interpretation altogether. Together, these accounts reveal a persistent pattern: accessibility-related work is consistently undervalued, misunderstood, or excluded. This inequity not only undermines compliance with the Accessible Canada Act but also compounds the administrative strain on community organizations. It is this additional burden of tracking, categorizing, and defending expenses that leads directly into the next area of concern: **documentation challenges**.

Documentation & Eligibility Challenges



- 200.** The broader documentation process was described as confusing and overly burdensome. A senior consultant observed that *“compiling documentation related to hours worked, disbursements, and supporting evidence is time-consuming and confusing due to the lack of clear instructions.”* For small public-interest groups, this level of detail requires near-legal precision, even though they lack the in-house staff that industry intervenors can rely upon.
- 201.** Accessibility-related services pose similar challenges, with little clarity on how they should be documented in cost applications. The same consultant explained that *“guidance is unclear on how to properly document and claim expenses related to accessibility services, including sign language interpreting, translation, and transcription.”* These supports are critical to participation, yet the lack of clear pathways for recognition forces organizations to expend extra effort on justification, often without assurance of recovery.
- 202.** This problem extends further to the treatment of travel and related expenses, where vague or inconsistent guidance creates uncertainty. As the consultant noted, *“ambiguities remain regarding the process for claiming mileage, rental cars, ride-share services (Uber, cabs), train fares, and airfare, making compliance and reimbursement difficult.”* Without clear rules, claimants must guess how to categorize routine expenses, which increases the likelihood of rejections or reductions. The same uncertainty has surrounded per diems, where, as Jeffrey Beatty explained, *“public interest groups have faced years of confusion around per diems. Many of us were still operating under the assumption of a \$48 daily rate, only to later discover that the Commission had shifted to the National Joint Council framework without directly informing participants.”* He added that *“the Commission’s failure to proactively communicate updates to per diem rates leaves accessibility-focused groups at a disadvantage. Without timely information, Deaf-led organizations risk under-claiming eligible expenses, while industry players with more resources remain fully informed.”*
- 203.** This uncertainty around travel and incidental claims is most visible in the treatment of per diems. What might appear to be a straightforward reimbursement has, in practice, become a recurring source of confusion for public-interest groups. Inconsistent communication about rates and eligibility has left organizations unsure of what can be claimed and under what conditions, with Deaf-led groups often learning of changes only after the fact.

Per diems for Meals while travelling for public hearings

204. The current per diem rate has been unclear to public interest groups for some time. We find that the Guidelines mention a total of \$48.00 per day and a [50km. as](#) the measure from a regular place of work as qualification to claim per diems.
205. Historically, the Commission's taxation officer relied on a flat per diem rate of **\$48.00 per day** for meals associated with appearances at hearings held more than 50 kilometres from a participant's regular place of work. Where the distance was less than 50 kilometres, the allowance was broken down into individual meal amounts, **\$10 for breakfast, \$12 for lunch, and \$26 for dinner**.⁴⁶ This earlier framework illustrates the Commission's recognition that hearing participation entails reasonable meal costs, although the methodology has since been updated to align with the National Joint Council Travel Directive.
206. At present, the Commission requires costs claimants to rely on the per diem allowances set out in the **National Joint Council (NJC) Travel Directive**, which provides standardized rates for meals and incidental expenses across Canada and abroad. Effective **April 1, 2025**, and still current as of today, the NJC rates (all amounts in CAD and tax-inclusive) allocate **\$20.65 for breakfast, \$20.90 for lunch, and \$51.25 for dinner**, with **incidentals set at \$17.30 per day**. This results in a combined **daily total of \$110.10** for meals and incidentals. In addition, the Directive provides a **\$50.00 per night allowance** for private non-commercial accommodation (for stays with family or friends, up to 120 days).² These updated benchmarks ensure consistency and transparency while reflecting the real costs faced by participants in Commission proceedings.⁴⁷
207. Confusion over per diem allowances further illustrates how unclear guidance creates unnecessary barriers for public-interest groups. Historically, the Commission's taxation officer applied a flat daily rate of \$48 for meals during hearings held more than 50 kilometres from a participant's workplace, with smaller allocations for meals when travel fell within that distance. While this approach acknowledged the reality of meal costs for participants, it was later replaced by a shift to the National Joint Council (NJC) Travel Directive framework, which provides standardized allowances for meals and incidentals across Canada and abroad.

⁴⁶ Canadian Radio-television and Telecommunications Commission, *Guidelines for the Taxation of Costs*. Available at: https://crtc.gc.ca/eng/forms/form_301.htm (accessed September 7, 2025).

⁴⁷ National Joint Council of the Public Service of Canada, *Travel Directive*. Available at: <https://www.njc-cnm.gc.ca/directive/d10> (accessed September 7, 2025).

208. The updated NJC rates, effective April 1, 2025, now set reimbursement at \$20.65 for breakfast, \$20.90 for lunch, \$51.25 for dinner, and \$17.30 for incidentals, creating a combined total of \$110.10 per day. A \$50 allowance for private non-commercial accommodations, such as staying with family or friends, is also included for up to 120 days. These rates are consistent and transparent on paper, but the challenge lies in ensuring that public-interest groups are fully aware of them and able to apply them correctly.
209. As Jeffrey Beatty explained, *“For years, many of us operated under the old \$48 flat per diem because no one at the Commission clearly communicated that the framework had shifted to the National Joint Council rates. This lack of proactive outreach leaves Deaf-led and accessibility-focused groups disadvantaged, sometimes under-claiming what we’re entitled to while larger, better-resourced stakeholders remain fully informed.”* His reflection highlights how communication gaps undermine fairness by disadvantaging groups that already face systemic barriers in navigating complex regulatory processes.
210. The absence of timely, accessible communication about policy updates compounds the workload of smaller organizations, forcing them to track down details that should be clearly provided by the Commission. Without consistent outreach in plain language and in ASL/LSQ, participants risk relying on outdated figures or misinterpreting eligibility rules, leading to financial losses. Addressing this gap is critical to ensuring equitable participation in CRTC proceedings and to preventing inadvertent under-claiming by those least able to absorb unreimbursed costs.

Issues of Awareness and Communication

211. A persistent challenge is that **public interest groups are often not made aware of these updates in a timely manner**, leaving many to rely on outdated figures such as the historic \$48 per diem previously used by the Commission’s taxation officer. This lack of proactive communication is particularly problematic for **Deaf-led organizations and other accessibility-focused groups**, which already face systemic barriers in navigating regulatory and financial processes. Without clear and regular notification of policy or reimbursement updates, these groups risk under-claiming eligible expenses or being disadvantaged in cost recovery compared to more established stakeholders. Greater transparency and direct outreach from the Commission is necessary to ensure equitable participation.

- 212.** This inequity is further underscored in how time and expertise are valued. James Roots questioned whether small increments of work were even considered claimable, asking, *“If it takes me less than ten minutes to read two or three emails... is that sufficient ‘work’ to record the ten minutes as billable hours? A lawyer would claim it, but I’m not a lawyer and therefore cannot charge by the rules and standards that apply to them.”* He contrasted this stricter scrutiny with the treatment of telecommunications companies, recalling that *“they argued against claiming staff time, as well as claims for the time and expertise of certain Board members. Yet they had no hesitation in claiming fees for their own staff lawyers, amounting to tens of thousands of dollars in comparison to the few hundred dollars CAD-ASC staff and directors claimed!”* Taken together, these reflections highlight a systemic imbalance: community consultants are held to higher standards while corporate lawyers enjoy unquestioned recognition of their time, perpetuating inequities in both credibility and compensation.
- 213.** These inequities are not limited to how time and expertise are valued; they extend into the very mechanics of participation. Barriers in technology, documentation, and submission systems add another layer of exclusion, particularly for Deaf-Blind participants. What should be routine administrative steps often become disproportionate hurdles, requiring extra support and unpaid labour simply to meet the Commission’s procedural requirements.

Systemic Inequities and Procedural Barriers

Accessibility-Specific Challenges

- 214.** Systemic inequities are embedded throughout the cost application process, creating both accessibility and procedural obstacles. For Deaf-Blind participants, even the act of submitting documents has been a barrier. As Terri Nolt and Leonor Vlug explained, *“digital submission platforms are definitely a challenge for Deaf-Blind persons. Through collaboration between DBPC, CNSDB, and the Deaf Wireless Canada Consultative Committee, Deaf-Blind groups enlisted sighted Deaf team members to submit online and via email the necessary documents, including Cost Applications and Procedural Requests.”* This reliance on additional support highlights how inaccessible systems force participants to find ad hoc workarounds, adding labour that should not be necessary.
- 215.** These inequities also extend to how the Commission scrutinizes hours of work. Leonor Vlug observed that *“the main issue we feel is that we have constantly been challenged on the amount of time we have reported working on this proceeding, as well as others.”* Such recurring challenges to reported time

create stress and a perception that accessibility-focused groups face more intense scrutiny than industry intervenors, undermining confidence in the fairness of the process.

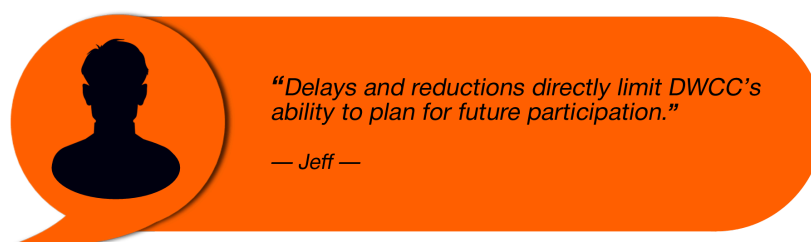
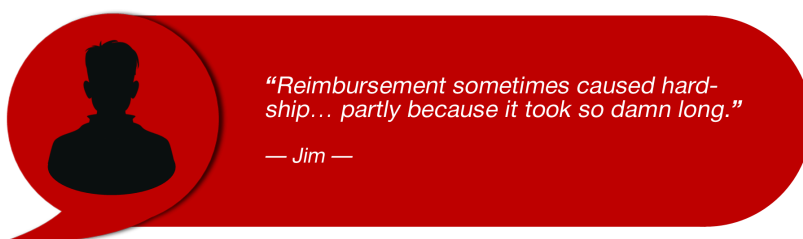
- 216.** Taken together, these procedural and accessibility barriers illustrate how systemic inequities reinforce one another, limiting equitable participation for DDBHH organizations. These challenges set the stage for another recurring theme identified by interviewees: the lack of transparency and fairness in how the Commission reviews, reduces, or disallows costs.

Transparency & Fairness

- 217.** Interviewees described how systemic barriers are reinforced by the Commission's lack of transparency in its cost decisions. A recurring frustration was the absence of clear reasoning when costs were reduced or disallowed. One senior consultant noted that *"unexplained reductions—certain costs were reduced by the CRTC without any explanation or supporting rationale."* Similarly, Jeffrey Beatty explained that *"some accessibility-related costs were reduced with limited or no explanation. The lack of transparency left DWCC uncertain about how to adjust in future filings."* Together, these experiences highlight how the opacity of the process undermines predictability and forces community organizations to operate under uncertainty about what will or will not be approved.
- 218.** This lack of transparency is compounded by inconsistent treatment of different categories of expenses. Beatty emphasized that *"legal and consulting fees are accepted as standard, while accessibility supports must be repeatedly justified."* Such an approach not only creates inequities in cost recovery but also signals that accessibility supports are considered optional rather than essential, placing additional burdens on Deaf, DeafBlind, and Hard of Hearing participants.
- 219.** To correct this imbalance, participants called for structural reforms that explicitly recognize the unique challenges faced by public-interest and accessibility-focused organizations. As one senior consultant argued, the Commission must *"recognize that public interest and accessibility-focused organizations have fewer resources compared to industry participants. Implement a 'public interest participation support fund' or enhanced cost recovery mechanism to ensure equitable participation."* This recommendation underscores that fairness requires not just transparency in decision-making, but also proactive measures to level the playing field between resource-constrained community groups and corporate intervenors.

- 220.** The absence of transparency and fairness in how costs are assessed is closely tied to the financial realities of cost recovery. When organizations cannot predict whether their expenses will be recognized or reduced without explanation, the uncertainty compounds the delays and financial risks already built into the reimbursement process. These challenges are explored in the next section on ***Reimbursement Delays & Financial Impact***.

Reimbursement Delays & Financial Impact



- 221.** For many accessibility-focused organizations, delays in receiving cost reimbursements create significant financial strain. Even when costs are eventually awarded, the lengthy timelines, often stretching months or even years, undermine the ability of smaller, community-based groups to plan, budget, and sustain their participation in CRTC proceedings. Unlike large telecommunications companies or well-funded public-interest groups, Deaf-led and accessibility organizations do not have reserve funds or salaried staff to bridge these gaps. The uncertainty of both timing and amount of reimbursement forces organizations to take personal financial risks or scale back their involvement, threatening the long-term sustainability of their contributions to regulatory processes.
- 222.** Interviewees repeatedly stressed that delays in reimbursement create not only financial obstacles but also a chilling effect on participation. James Roots recalled that *"reimbursement sometimes caused hardship... partly because it took so damn long for them to receive their desperately-needed money, and partly because the reimbursement procedure was so stressful that they did not want to participate in any subsequent Commission proceedings."* In some cases,

he explained, contributions were not even claimed for reimbursement despite the work being done, because the risk of triggering disputes with telecom companies felt too great. This reality demonstrates how uncertainty in the system can suppress engagement rather than encourage it.

223. Jeffrey Beatty echoed these concerns, noting that “delays and reductions in reimbursement directly limit DWCC’s ability to plan for future participation. Without certainty of recovery, we are forced to take financial risks or scale back participation.” For accessibility-focused organizations that rely on volunteers, unreimbursed time and expenses add yet another barrier. Beatty emphasized that “volunteer time remains uncompensated. Out-of-pocket expenses related to accessibility and preparation were also partially unrecovered, forcing DWCC to subsidize participation through unpaid labour.” These experiences underscore the inequities in a system that presumes intervenors have the financial flexibility to wait months, or even years, for repayment.

224. These systemic delays are not abstract frustrations but have tangible impacts on participation and representation. When reimbursement is uncertain or excessively slow, organizations are forced to either shoulder costs upfront or limit their engagement altogether. To illustrate how these barriers play out in practice, the following case study examines DWCC’s experience with the TDI Conference 2023.

Case Example: TDI Conference 2023

225. The challenges of reimbursement delays are not theoretical. A concrete example is the **TDI Conference 2023**, held July 27–29, 2023, in Maryland. DWCC recognized the importance of this fully accessible international event for Deaf, DeafBlind, and Hard-of-Hearing participants and sought sponsorship support from the three national carriers (Bell, Rogers, TELUS) as well as the Canadian Telecommunications Association (CTA).⁴⁸

226. Despite clear references to **Telecom Regulatory Policy 2023-41** in **paragraph 41**, and the **2023 Policy Direction**, which encourage service providers to financially support accessibility groups, all sponsorship requests were refused. **Paragraph 41** states that the “**Commission encourages the industry to explore methods of providing financial support** for community representatives participating in consultations with persons with disabilities, support that could include financing.”⁴⁹

⁴⁸ DWCC Letter of Request, April 27, 2023. (Lisa Anderson, Chair).

⁴⁹ CRTC, *Telecom Regulatory Policy CRTC 2023-41*, 23 February 2023, para. 41, available at: <https://crtc.gc.ca/eng/archive/2023/2023-41.htm>

227. Bell cited its funding restrictions to registered charities, Rogers provided only generic program information, and TELUS redirected DWCC to a quarterly portal review process that made timely support impossible.^{50 51 52} The Canadian Telecommunications Association (CTA, then operating under the Canadian Wireless Telecommunications Association [CWTA] name) similarly declined to provide sponsorship, despite its stated role as the unified industry voice for promoting accessibility and inclusion in telecommunications.⁵³ This collective refusal illustrates a systemic failure of industry actors to operationalize the accessibility commitments set out in TRP 2023-41 and the 2023 Policy Direction.
228. As a result, **DWCC members personally covered \$11,500 CAD** in travel, accommodation, and registration costs for four representatives, including an Indigenous consultant and a DeafBlind consultant. This demonstrates how industry neglect forces accessibility groups to take on significant financial risk, only to wait months, or years, for potential reimbursement through the cost award system.
229. This example underscores the systemic inequity: **without timely cost recovery or proactive financial support, accessibility organizations are left to subsidize their own participation**, while industry players face no such barriers. Embedding explicit recognition of accessibility-related expenses, along with clear service standards for reimbursement timelines, is essential to ensure equitable participation in future proceedings.
230. During a meeting with CRTC staff on November 15, 2023, Nanao Kachi explicitly advised DWCC to “include these costs in a future cost proceeding”⁵⁴ which is now 2025-94.
231. **DWCC** has compiled a Table of Correspondence outlining documents mentioned in this report, including sponsorship request letters, carrier responses, and CRTC staff meeting notes. These documents and materials are provided as supporting evidence to substantiate the financial impact and systemic barriers described herein.

⁵⁰ Bell Canada response, September 7, 2023 (Philippe Gauvin, Assistant General Counsel).

⁵¹ Rogers Communications response, September 7, 2023 (Ruth Altman, Director, Regulatory Consumer Policy).

⁵² TELUS response, August 24, 2023 (Eric Edora, Regulatory Affairs).

⁵³ CWTA (CTA) response, May 4, 2023, (Ursula Grant, Vice President, Industry and Consumer Affairs / Senior Director, Industry Affairs)

⁵⁴ Meeting with CRTC staff, November 15, 2023 (notes from discussion with Nanao Kachi).

Systemic Inequities – Unfair Service Charges

- 232.** For small public-interest organizations such as the Deaf Wireless Canada Consultative Committee (DWCC), cost awards are often the only mechanism to recover expenses for participation in CRTC proceedings. Yet, even when the Commission issues a Telecom Cost Order, organizations like DWCC are still subject to unfair deductions by the very service providers who are required to pay them.
- 233.** One clear example involves **Rogers Communications**, which has repeatedly processed cost award payments through its AMEX service system. Each transaction carried an additional “service fee” that directly reduced the funds awarded to DWCC, despite the Commission’s explicit approval of the full amounts. For example:
- a. **Telecom Order CRTC 2025-198:** Rogers was ordered to pay **\$8,815.96**. Again, an AMEX service fee reduced the award by **\$110.20**, leaving a net amount of **\$8,705.76**.⁵⁵
 - b. **Telecom Order CRTC 2025-216:** Rogers was ordered to pay **\$11,101.11**. Due to the AMEX service fee, DWCC lost **\$138.76** of that award, leaving a net amount of **\$10,962.35**.⁵⁶
- 234.** These deductions, while minor in corporate accounting, create a disproportionate burden for non-profit accessibility groups operating on limited budgets. DWCC is not a corporate vendor and should not be treated as such. The application of service fees effectively undermines the Commission’s decision by reducing the funds available for the work they were explicitly approved to support.
- 235.** Such practices highlight a systemic inequity: accessibility organizations are treated as if they were large businesses with the capacity to absorb financial losses, when in reality they are small, community-based groups ensuring that Deaf, DeafBlind, and Hard of Hearing Canadians have a voice in regulatory processes. These organizations should not have to subsidize their own participation through hidden transaction fees imposed by the very companies whose regulatory obligations they are helping to shape.
- 236.** The cumulative impact of reimbursement delays is stark: organizations are left to absorb costs upfront, shoulder personal risk, and weather long stretches of

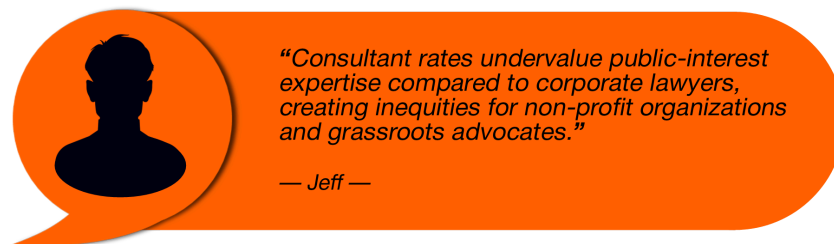
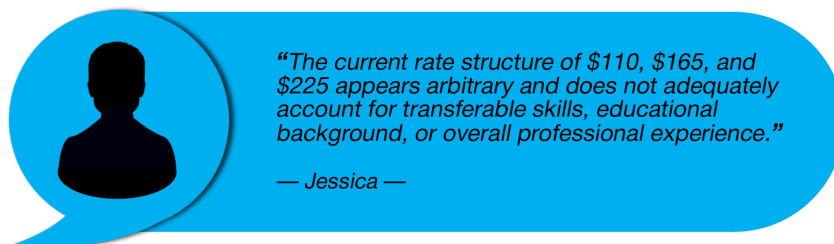
⁵⁵ Rogers Communications payment of cost award, Telecom Order CRTC 2025-198 (processed with AMEX Service Fee), August 2025.

⁵⁶ Rogers Communications payment of cost award, Telecom Order CRTC 2025-216 (processed with AMEX Service Fee), September 2025.

uncertainty while larger industry players move through the process unimpeded. For smaller, Deaf-led groups in particular, the inability to secure timely reimbursement undermines sustainability and perpetuates a cycle where only the most well-resourced actors can reliably participate.

- 237.** The inequities tied to transparency and reimbursement are compounded by how consultant rates themselves are structured. Interviewees stressed that the value of lived experience, professional expertise, and sustained participation is not adequately reflected in the Commission’s current framework. Without a rate system that properly recognizes these contributions, accessibility-focused groups remain undervalued compared to corporate legal teams. These concerns form the basis of the next section, which examines ***Rate Structure and Equity in Valuing Expertise***.

Rate Structure & Equity in Valuing Expertise



- 238.** Concerns about fairness in reimbursement naturally extend to how consultant rates are determined. Participants emphasized that the current tiered framework of \$110, \$165, and \$225 per hour is both arbitrary and inequitable. It fails to capture key factors such as lived experience, educational background, and the consistency of participation, while granting the same recognition to groups with sporadic involvement as to those with years of continuous contributions. This imbalance not only undervalues accessibility-focused consultants but also reinforces systemic inequities in how public-interest expertise is treated compared to corporate legal teams.

- 239.** The interviews revealed a consistent concern that the current rate structure undervalues the expertise of accessibility-focused consultants while rewarding corporate legal teams. James Roots argued that “reimbursement rates for expertise... should be made more equal. If nothing else, this could reduce the condescension with which the corporate lawyers regard our contributions.” His observation underscores how inequities in the system perpetuate not only financial disadvantage but also a hierarchy of credibility, where corporate professionals are automatically valued more highly than community-based experts.
- 240.** Participants emphasized that reform must align with Canada’s broader accessibility and equity commitments. Jeffrey Beatty recommended that the Commission “apply the Accessible Canada Act and the 2023 Policy Direction explicitly to the cost process, ensuring accessibility groups are not disadvantaged compared to larger, well-funded organizations.” Embedding these frameworks into the cost award structure would ensure Deaf, DeafBlind, and Hard of Hearing organizations are recognized for expertise and not penalized for limited financial resources.
- 241.** Several interviewees highlighted the arbitrary nature of the current consultant rate tiers. Jessica Sergeant noted that *“the current rate structure of \$110, \$165, and \$225 appears to be arbitrary and does not adequately account for key differentiators such as transferable skills, educational background, or overall professional experience.”* She argued for a more merit-based approach, explaining that *“rate progression should be based on a minimum number of hours actively contributed to CRTC proceedings, rather than sporadic involvement over an extended period.”* To address the diversity of qualifications within the public-interest community, Sergeant further suggested *“separate tracks for lived experience only, formal education only, or both - create three distinct but equitable progression paths.”* Together, these proposals point to a reimagined system where rates reflect both the quality and continuity of contributions, rather than arbitrary benchmarks.
- 242.** Taken together, these concerns illustrate that rate structures are not simply a technical issue of dollars per hour, but a reflection of how the Commission values different forms of expertise. When lived experience and continuous participation are sidelined in favour of arbitrary tiers, the system undermines both fairness and credibility. Addressing these inequities requires more than procedural reform; it calls for aligning cost awards with the Commission’s broader legal and policy obligations.

Legal Framework & Obligations



“In light of the Accessible Canada Act and the Policy Direction, DWCC has been unfairly targeted compared to other Deaf groups—especially around accessibility costs.”

— Lisa —

- 243.** Interviewees stressed that beyond procedural burdens, the Commission must also be held to its binding legal responsibilities. They underscored that the CRTC carries a clear duty to accommodate Deaf, DeafBlind, and Hard of Hearing (DDBHH) participants, a duty reinforced by the *Accessible Canada Act* (ACA). The Act explicitly recognizes ASL, LSQ, and Indigenous Sign Languages as primary languages of communication for Deaf Canadians, and requires federally regulated institutions to proactively identify, remove, and prevent barriers to accessibility.
- 244.** As one senior consultant emphasized, *“it is important to emphasize that the CRTC has a legal duty to accommodate Deaf, DeafBlind, and Hard of Hearing (DDBHH) individuals in order to ensure full participation at all levels of its proceedings.”* This duty is directly supported by the Charter of Rights and Freedom, Canadian Human Rights Act, Accessible Canada Act, which requires federally regulated institutions *“to proactively identify, remove, and prevent barriers to accessibility.”* These provisions make clear that accessibility is not a courtesy extended at the discretion of the Commission, but a legal requirement woven into Canada’s regulatory framework.
- 245.** Building on this framework, I have argued that, in light of the ACA and the 2023 Policy Direction, accessibility-related costs must be treated as integral to participation rather than as optional or incidental. Embedding these obligations into the cost recovery process would ensure that accessibility groups are not disadvantaged compared to larger, well-funded organizations, and would place the Commission’s practices in alignment with Canada’s statutory commitments to equity and inclusion.
- 246.** Viewed collectively, these obligations underscore that reforms to the cost application process are not discretionary but a legal necessity. Ensuring that accessibility costs are explicitly recognized, and that instructions and procedures are fully inclusive, is part of the CRTC’s duty to uphold both the ACA and its own mandate for equitable participation.

247. Ultimately, the legal framework makes clear that accessibility is not discretionary—it is a statutory requirement that must shape every aspect of the cost application process. Yet, as the interviews reveal, these obligations are not consistently translated into practice. Gaps between policy and implementation mean that community organizations continue to encounter systemic inequities in how their participation is treated. These disconnects between duty and reality, recognition and execution form the basis of the next section.

Deaf-Owned Businesses: Unique Accessibility Insights

248. Deaf-owned businesses are often born out of social innovation rooted in lived experience. They emerge directly from the barriers faced by Deaf individuals and are created with the purpose of addressing accessibility for the Deaf community.

249. What sets Deaf-owned businesses apart is the authenticity of their perspective. Led by individuals who have navigated these barriers themselves, they bring unique expertise to accessibility. Deaf, DeafBlind, and Hard of Hearing entrepreneurs understand first-hand the systemic challenges in communication and inclusion. This lived knowledge enables them to design solutions, customer service models, and workplace practices that are not only equitable and culturally aligned, but also forward-thinking and innovative.

250. Unlike traditional businesses that may treat accessibility as an afterthought or compliance requirement, Deaf-owned businesses integrate accessibility into every layer of their operations. Their leadership ensures that community equity, cultural awareness, and sign language access are prioritized. They also serve as powerful examples of how accessibility can drive broader social innovation, benefiting both Deaf and hearing customers alike.

251. By supporting Deaf-owned businesses, communities and partners gain more than just services - they gain collaboration with accessibility experts, who lead with empathy, cultural knowledge, and lived experience.

252. Often these Deaf businesses are subject matter experts because they have the lived experience as well as the technical background to address the accessibility of the product and offer a service as a solution to the barriers.

253. The **DWCC** has consistently partnered with Deaf-owned businesses to provide technical expertise for our submissions to various CRTC proceedings. Supporting Deaf-owned businesses is central to strengthening what is often referred to as “the Deaf ecosystem.” For more background on this concept, please see Convo’s resources elaborating on the term, [*The Deaf Ecosystem*](#).

- 254.** Historically, DWCC has engaged a number of Deaf-owned businesses to support its regulatory work, including **Eversa**, **Tradusigne**, **Cinéall**, **Maple Communications** (TNC CRTC 2017-33), **360 Direct Access** (TNC CRTC 2025-20), and **Convo Canada**. These partnerships provided technical expertise, document preparation, and communication accessibility solutions that were crucial for participation in CRTC processes. Often these businesses are subject matter experts (SME) because they combine lived experience with technical skills to deliver accessibility solutions that mainstream providers cannot.
- 255.** **DWCC**'s operations rely on cost awards to cover expenses such as communications, software, and travel for its Chairperson to attend out-of-town meetings. However, when it comes to cost applications, **DWCC** is placed at a disadvantage. The CRTC's delayed decisions on cost orders, combined with further delays in payments from telecommunications companies, force DWCC to borrow against its members' own payouts in order to pay Deaf-owned business service provisions or consultants in a timely manner.
- 256.** This situation places individual consultants and analysts, many of whom are Deaf-owned businesses, at a significant disadvantage. Already contending with the rising cost of living and fewer economic opportunities, they are forced to absorb financial strain while waiting for delayed cost reimbursements. Unlike larger organizations that may have reserves to cover expenses, these individuals often rely on timely payments to meet their basic living expenses. The current structure not only undermines their financial stability but also creates barriers to their continued participation in regulatory proceedings, effectively limiting the diversity and authenticity of Deaf perspectives represented.
- 257.** To ensure equitable participation, there should be a mechanism allowing these expenses, documented with pro forma invoices, to be reimbursed as interim disbursements, rather than requiring **DWCC** to wait until the final cost award is released and further putting individuals and businesses at a disadvantage for waiting for the cost payouts.

Deaf tech solution businesses participate in proceedings

- 258.** **DWCC** would also like for CRTC to allow Deaf businesses which offer unique subject matter expertise with communication accessibility to participate in relevant CRTC proceedings where there is no conflict of interest and not put groups such as **DWCC** at a disadvantage with the payments.
- 259.** Historically such Deaf businesses faced barriers and scrutiny by CRTC and the teleco's, **DWCC** uses as a *case study* as an example with Maple Communications, we do not want to see a repeat of this situation to any Deaf

businesses. DWCC would like to see Deaf owned businesses have the ability to participate in CRTC proceedings, and have it benefit the Deaf Ecosystem as a whole.

Case Study: Maple Communications – Documentation History (TNC 2017-33)

260. Maple Communications’ participation in Telecom Notice of Consultation 2017-33 *Review of the regulatory framework for text-based message relay services*, is instructive because it highlights how Deaf-owned businesses have been forced to navigate a disproportionate documentation burden to defend their eligibility and contributions.

- a. January 8, 2018 – Maple filed its cost application package, including a cover letter to the Commission, Form III (consultant and analyst fees), and Exhibit A (summary of disbursements).⁵⁷ Supporting invoices were attached, including a U.S.-denominated invoice later converted to Canadian dollars for cost recovery.
- b. January 21, 2018 – Maple replied to TELUS, correcting the company’s figures and confirming its total cost claim of \$5,614.35, split between \$2,820 in consultant fees and \$2,794.35 in disbursements.
- c. April 5, 2018 – Maple responded to Bell’s objections, clarifying the treatment of third-party consultant hours and reaffirming Maple’s distinct contribution.⁵⁸

Commission decision

261. In Telecom Order CRTC 2018-401, the Commission approved only \$2,794.35 for disbursements, declining to recognize Maple’s internal consultant fees as eligible. Payment was directed to be shared between Bell and TELUS.⁵⁹

Implications for Deaf-owned businesses

262. This outcome demonstrates three systemic problems that persist today:

- a. Ambiguous forms and categories: Maple’s use of Form III and disbursement schedules created confusion about how to classify third-party accessibility expertise.⁶⁰

⁵⁷ Maple Communications, Cost Application filing, January 8, 2018 (Form III – Summary of Consultant and Analyst Fees; Exhibit A – Summary of Disbursements).

⁵⁸ Maple Communications, Response to TELUS, January 21, 2018.

⁵⁹ Maple Communications, Response to Bell, April 5, 2018.

⁶⁰ Telecom Order CRTC 2018-401, approving \$2,794.35 in disbursements, declining consultant fees.

- b. High procedural overhead: Multiple rounds of replies to TELUS and Bell consumed significant resources for a small Deaf-owned company.
- c. Partial recovery despite valuable input: Although Maple's submissions helped strengthen the record on accessibility in text-based relay services, it recovered less than half of its requested costs.

263. For DWCC, Maple's experience shows why cost reform under 2025-94 must explicitly accommodate Deaf-owned businesses and consultants. Without clearer eligibility rules and predictable treatment of accessibility-related expertise, these organizations remain at a structural disadvantage, undermining the diversity of perspectives that the Commission requires to meet its accessibility obligations.

Qualification to Participate in CRTC Proceedings

264. One of the core issues raised in Maple's cost application was not the amount claimed, but whether Maple qualified to participate in the proceeding at all. Both TELUS and Bell argued that Maple, as a for-profit Deaf-owned business, should be ineligible for costs. They suggested that the cost process is not designed to subsidize private commercial interests and claimed Maple had not demonstrated that it represented a distinct group of class of subscribers, as required under **CRTC Information Bulletin 2016-188**.

265. Maple countered that excluding all private Deaf-owned companies from cost eligibility is misguided and risks silencing valuable perspectives. Maple emphasized that it was not an MRS provider and receives no revenues from relay service contracts. Its submissions were informed by grassroots connections to Deaf, DeafBlind, and Hard of Hearing communities, which it serves through accessibility expertise rather than commercial competition. Maple also highlighted that its contributions added unique value to the CRTC's process, aligning with Rule 66(1)(a)(i), which sets out that applicants must assist the Commission in developing a better record.

266. The experiences of Deaf-owned businesses such as Maple Communications demonstrate the systemic disadvantages faced by small accessibility-focused enterprises in the current cost framework. Despite adding measurable value to CRTC proceedings, they are often subjected to ambiguous rules, unnecessary scrutiny, and partial recognition of their contributions. Unless reforms are enacted, these inequities will persist, suppressing the full participation of Deaf, DeafBlind, and Hard of Hearing communities in regulatory decision-making. By embedding accessibility and equity into the cost award process, the Commission has the opportunity to ensure that lived expertise and technical social innovation

from Deaf-owned businesses are recognized as integral to Canada's communications system.

267. The broader concern is that current award rules and interpretations can put Deaf-owned micro-businesses, consultants and analysts at a structural disadvantage. By questioning their eligibility, telcos attempt to discredit their standing rather than address the substance of their expertise. This undermines diversity of participation and risks narrowing the CRTC's understanding of accessibility issues. For Deaf-owned businesses, participation in regulatory proceedings is not driven by commercial gain, but by a commitment to accessibility rooted in lived experience. Ensuring clear eligibility for such entities is essential to maintain authentic representation in regulatory processes.

268. To address these inequities, DWCC requests that the Commission explicitly allow Deaf-owned businesses, particularly those engaged in technology and accessibility innovation, to participate in telecommunications proceedings. These businesses offer unique contributions, combining lived experience with technical expertise, and their exclusion undermines the Commission's ability to fully understand accessibility barriers. Establishing clear eligibility for Deaf-owned businesses will ensure that their expertise is valued on par with traditional public-interest organizations, while also strengthening the authenticity and diversity of perspectives in the CRTC's record.

269. The experiences of Deaf-owned businesses such as Maple Communications demonstrate the systemic disadvantages faced by small accessibility-focused enterprises in the current cost framework. Despite adding measurable value to CRTC proceedings, they are often subjected to ambiguous rules, unnecessary scrutiny, and partial recognition of their contributions. Unless reforms are enacted, these inequities will persist, suppressing the full participation of Deaf, DeafBlind, and Hard of Hearing communities in regulatory decision-making. By embedding accessibility and equity into the cost award process, the Commission has the opportunity to ensure that lived expertise and technical innovation from Deaf-owned businesses are recognized as integral to Canada's communications system.

Request for Participation

270. To address these inequities, DWCC requests that the Commission explicitly allow Deaf-owned businesses, particularly those engaged in technology and accessibility innovation, otherwise termed as social innovation, to participate in telecommunications proceedings. These businesses offer unique contributions, combining lived experience with technical expertise, and their exclusion

undermines the Commission's ability to fully understand accessibility barriers. Establishing clear eligibility for Deaf-owned businesses will ensure that their expertise is valued on par with traditional public-interest organizations, while also strengthening the authenticity and diversity of perspectives in the CRTC's record.

- 271.** By adopting these measures, the Commission will embed accessibility into its cost framework, ensuring that Deaf-owned businesses can continue to contribute their technical and cultural expertise to regulatory proceedings.

Final Reflections of the DWCC Chair

- 272.** In reflecting on the interviews and the broader evidence presented, the Chair of DWCC underscored the urgency of reforming the cost application process. He explained that the burden of participation remains disproportionately high for accessibility-focused groups, stating that *"the process is highly detailed and requires careful compliance with Commission guidelines. While I am experienced in CRTC proceedings, the preparation remains administratively heavy for small, accessibility-focused groups like DWCC."*

- 273.** These administrative challenges are compounded by financial risks and inequities in recognition. Beatty stressed that *"delays and reductions in reimbursement directly limit DWCC's ability to plan for future participation. Without certainty of recovery, we are forced to take financial risks or scale back participation."* He also pointed to the recurring problem of per diems, noting that *"public interest groups have faced years of confusion around per diems. Many of us were still operating under the assumption of a \$48 daily rate, only to later discover that the Commission had shifted to the National Joint Council framework without directly informing participants."* The lack of proactive communication leaves accessibility groups at a disadvantage, further compounding structural inequities.

- 274.** A central theme of his reflections was the treatment of accessibility-related costs. As he explained, *"accessibility work is treated as an 'extra' rather than a recognized necessity. This inequity forces accessibility groups to expend more effort than other intervenors just to justify their participation needs."* He further emphasized that without reforms, the system continues to signal that accessibility supports are optional, despite their critical role in ensuring equitable participation.

- 275.** Finally, Beatty highlighted the need for transparency and accountability in cost decisions. *"Transparency in reductions: require the Commission to provide detailed explanations when disallowing or reducing costs,"* he argued, stressing

that without this accountability, organizations cannot plan or adjust in a predictable way. He concluded by calling for systemic alignment with Canada's accessibility commitments: *"Applying the Accessible Canada Act and the 2023 Policy Direction explicitly to the cost process [would ensure] accessibility groups are not disadvantaged compared to larger, well-funded organizations."*

276. Viewed collectively, these reflections highlight both the resilience of accessibility groups in navigating an inequitable framework and the unsustainable costs of continuing without reform. They provide a direct bridge to the recommendations that follow, which articulate concrete steps to embed fairness, accessibility, and accountability into the CRTC's cost recovery process.

277. The reflections above set the stage for what must come next. Drawing on interviews, evidence, and lived expertise, the following recommendations outline in detail the reforms needed to make participation in CRTC processes truly equitable.

Recommendations

Accessibility and Plain Language



"The CRTC needs to provide a parallel summary of its paperwork in simple language, at a Grade 5 literacy level, with ASL/LSQ versions."

— Jim —



"The CRTC staff must take up that responsibility by doing the following: prepare written materials with the assistance of Deaf and Deaf-Blind experienced consultants, provide the same information in ASL and LSQ videos, and host both live, in-person and virtual workshops."

— Leannor —

278. Interviewees highlighted that the Commission's communications must become both clearer and more accessible if equity in participation is to be achieved. James Roots stressed that *"the CRTC needs to provide a parallel summary of its paperwork in simple language, i.e., at a Grade 5 literacy level... Each public notice should be accompanied by the simple language version as*

well as ASL/LSQ versions.” His comments underline how the literacy gap and absence of sign-language resources create systemic barriers that exclude many from effectively navigating the process.

- 279.** Leonor Vlug added that this responsibility cannot rest solely on community groups. She explained that *“if the CRTC is going to challenge the number of hours consumer groups record and submit in their Cost Applications, then the CRTC staff must take up that responsibility by doing the following: prepare written materials with the assistance of Deaf and Deaf-Blind experienced consultants, provide the same information in ASL and LSQ videos, and host both live, in-person and virtual workshops.”* Her perspective makes clear that genuine accessibility requires proactive institutional support, not just higher demands on equity-seeking groups.

Recognition of Accessibility Costs



“There needs to be a dedicated section on cost forms for accessibility expenses, such as ASL/LSQ interpretation and accessible formatting.”

— Jessica —

- 280.** Interviewees agreed that accessibility-related costs must be recognized as integral to participation rather than treated as optional extras. Jeffrey Beatty summarized the priority simply: *“explicit recognition of accessibility costs as recoverable.”* Jessica Sergeant reinforced this by pointing out that *“there needs to be a dedicated section on cost forms for accessibility expenses, a specific, labelled section for accessibility-related services. Examples include ASL/LSQ interpretation, accessible document formatting, translanguaging, communication access support, etc.”*
- 281.** A senior consultant echoed this call for structural reform, recommending the Commission *“create a specific category of allowable costs for accessibility-related work (e.g., captioning, ASL/LSQ interpretation, accessible formatting, consultations with accessibility communities).”* Sergeant further stressed that stronger protections are needed to ensure these costs are not diminished or challenged, stating that *“to ensure the meaningful participation of equity-seeking groups, all accessibility-related costs submitted through the cost recovery process must be explicitly protected from objection, reduction, or*

excessive scrutiny.” Together, these recommendations highlight that accessibility supports are not supplementary, they are the foundation for equitable engagement in CRTC proceedings.

Transparency and Accountability

- 282.** Interviewees underscored that cost recovery must be accompanied by clear, reasoned decision-making. A senior consultant argued that the Commission should *“require the CRTC to provide written reasons whenever costs are reduced, disallowed, or deemed ineligible.”* Without such explanations, participants are left uncertain about how to adjust their practices, and equity-seeking groups are disproportionately disadvantaged by the opacity of the processes.
- 283.** Both Jeffrey Beatty and other consultants pressed for stronger safeguards to ensure accountability. Beatty emphasized the need for *“transparency in reductions: require the Commission to provide detailed explanations when disallowing or reducing costs.”*
- 284.** Beyond explanations, a senior consultant recommended the establishment of a formal mechanism to ensure fairness, stating that the Commission should *“introduce a formal appeal or review process for applicants to challenge cost reductions or disallowances.”* Together, these recommendations aim to replace uncertainty with predictability, ensuring that public-interest organizations can participate with confidence in a fair and.

Timeliness and Reduced Administrative Burden

- 285.** Interviewees highlighted that the cost recovery process is not only administratively heavy but also chronically slow, undermining fairness for smaller, accessibility-focused groups. Jeffrey Beatty stressed the importance of reducing unnecessary paperwork, calling for *“simplified documentation requirements, especially for recurring costs.”* He also emphasized the need to expedite reimbursements through *“faster reimbursement timelines,”* noting that delays in payment create significant financial risk and can discourage organizations from future participation.
- 286.** Jessica Sergeant reinforced this view, framing timeliness itself as a matter of accessibility. She explained that *“for the cost process to be truly accessible, timeliness must be treated as a core component of fairness. There needs to be clear service standards and maximum decision timelines for cost applications.”*

Together, these recommendations underscore that reducing administrative burdens and setting enforceable timelines are not secondary efficiencies but central requirements for equitable participation.

- 287.** To address the persistent gaps in awareness, interviewees emphasized that the Commission must take greater accountability for how it communicates policy and reimbursement updates. A **formal communication mechanism**, such as a periodic bulletin distributed to registered public-interest organizations, would provide clarity and consistency. As Jeffrey Beatty observed, *“the CRTC needs to establish a consistent communication mechanism, such as a regular bulletin in plain language, ASL, and LSQ, so that Deaf-led and equity-seeking groups are not left guessing about policy or reimbursement updates. Without this, we risk continuing outdated practices, like relying on the old \$48/day per diem, while industry players move ahead fully informed.”* Providing updates in multiple accessible formats would strengthen transparency, inclusion, and equity in the cost recovery process, ensuring that accessibility groups can participate on an equal footing.

Deaf-owned businesses

- 288.** The CRTC should explicitly recognize Deaf-owned businesses, particularly those specializing in accessibility technologies and services, as eligible participants in telecommunications proceedings. This recognition should include:
- Clear eligibility criteria affirming the value of lived and technical expertise from Deaf-owned businesses;
 - A protected category for accessibility-related consultant and disbursement costs (e.g., document preparation, translation, accessibility software, social innovation services);
 - Mechanisms for interim reimbursement of pro forma invoices to prevent financial hardship; and
 - Transparent and consistent treatment of consultant rates and cost recovery for micro-businesses and accessibility consultants.
- 289.** By adopting these measures, the Commission will embed accessibility into its cost framework, ensuring that Deaf-owned businesses can continue to contribute their technical and cultural expertise to regulatory proceedings.
- 290.** By adopting these measures, the Commission will embed accessibility into its cost framework, ensuring that Deaf-owned businesses can continue to contribute their technical and cultural expertise to regulatory proceedings.

291. When implemented together, these recommendations outline a coherent framework for reform that directly addresses the inequities identified throughout the interviews. Ensuring accessibility through plain-language materials and ASL/LSQ resources, explicitly recognizing accessibility-related costs, mandating transparency and accountability in cost decisions, and establishing clear service standards with reduced administrative burdens are mutually reinforcing measures. Implemented as a whole, they would create a fairer and more predictable system that values the expertise of public-interest groups, aligns with the Accessible Canada Act and Policy Directions, and upholds the Commission's duty to ensure equitable participation for Deaf, DeafBlind, and Hard of Hearing Canadians.

292. While the long-form recommendations provide full context, we also recognize the need for clarity and quick reference. The following simplified list distills the same priorities into plain language for decision-makers and community members alike.

Simplified Recommendations

1. Accessibility and Plain Language

- a. Every CRTC notice should include a plain-language summary (Grade 5 level).
- b. Provide ASL and LSQ versions of all public notices.
- c. CRTC staff should work with Deaf and Deaf-Blind consultants to prepare accessible materials and host workshops (in-person and online).

2. Recognition of Accessibility Costs

- a. Accessibility costs (e.g., ASL/LSQ interpretation, captioning, accessible formatting, translanguaging, consultant fees) must be fully recognized and protected in cost recovery.
- b. Create a dedicated, labelled section for accessibility costs in cost forms. Ensure accessibility-related expenses cannot be challenged, reduced, or dismissed.
- c. Direct service providers, consistent with TRP 2023-41 (para. 41), to allocate **\$11,500.00** to DWCC to reimburse individuals contributing telecommunications accessibility expertise to proceedings.

3. Transparency and Accountability

- a. When costs are reduced or rejected, CRTC must provide written reasons.

- b. Establish a formal appeal or review process for applicants to challenge reductions.
- c. Require detailed explanations for any cost disallowances to improve fairness.
- d. Prohibit Rogers and other service providers from charging service fees on payments from small non-profit organizations.

4. Timeliness and Reduced Burden

- a. Simplify paperwork, especially for recurring accessibility costs.
- b. Speed up reimbursements with clear service standards and maximum decision timelines.
- c. Treat timeliness as a core part of accessibility.
- d. **Scheduling and Continuity Measures:**
 - 1. Avoid scheduling major deadlines immediately after statutory holidays.
 - 2. Establish a one-month quiet period in August each year for all public proceedings.
 - 3. Require telecom companies to designate alternate contacts for cost award payouts to ensure continuity during vacations.

5. Clear Communication Mechanism

- a. Regularly update equity-seeking groups through bulletins in plain language, ASL, LSQ and potentially Indigenous Sign Languages.
- b. Use these updates to share policy changes, reimbursement rules, and per diem updates.

6. Support for Deaf-Owned Businesses

- a. Recognize Deaf-owned accessibility businesses as eligible participants in CRTC processes.
- b. Create protected categories for accessibility-related services and consultant rates.
- c. Allow interim reimbursement of invoices and honorariums to prevent financial hardship.
- d. Ensure consistent treatment of small businesses and accessibility consultants in cost recovery.

293. Rounded together, these recommendations highlight what is required for systemic reform. Yet recommendations alone are not enough. To conclude, the Final Remarks capture the urgency of the moment, why delay is no longer acceptable, and why action is required now.

294. The call for systemic reform in the cost and funding framework cannot be separated from the broader accessibility agenda. Public-interest participation is only sustainable when the resources to support it are secure, timely, and equitable. Without dedicated recognition of accessibility-related costs, even the strongest recommendations risk collapsing under the weight of unpaid labour and financial precarity. This is why the reforms outlined above are not simply administrative adjustments, they are the foundation for meaningful participation in Canada's communications system. With this context established, the Final Remarks highlight why the moment for action has arrived and why further delay is indefensible.

Final Remarks

295. Reforming the cost and funding framework is not a technical exercise but a matter of urgency. Without secure and timely reimbursement for accessibility-related expenses, equity-seeking groups remain trapped in cycles of financial strain that deter full participation. Each delay compounds inequities and signals that the contributions of Deaf, DeafBlind, and Hard of Hearing communities are treated as optional rather than essential. Embedding accessibility costs into the heart of the Commission's funding structure is not just about correcting administrative gaps, it is about ensuring Canada meets its obligations under the Accessible Canada Act and the 2023 Policy Direction. The urgency of this moment demands that reforms move beyond discussion into immediate implementation.

296. Canada cannot afford to continue trailing behind. We were 16 years late in implementing Video Relay Services compared to the United States, a gap that directly undermined equity for Deaf, DeafBlind, and Hard of Hearing Canadians. Instead of leading, we remain followers, despite having the technology, expertise, and social innovators right here at home.

297. Today, Canada should be five to ten years ahead, not lagging behind. The tools exist, and Deaf innovators and subject-matter experts are ready. The hesitancy to act has no technical justification, only systemic inaction. Every year of delay compounds inequities and signals to Deaf and Hard of Hearing communities that their participation is secondary.

298. For years, advocates have pressed for practical solutions such as in-store QR codes enabling Deaf, DeafBlind, and Hard of Hearing customers to connect directly with accessible communication support upon entering a wireless or internet store. Direct ASL and LSQ customer service is already available, yet companies continue to resist deploying it. This resistance is indefensible: it is neither a question of cost nor technology, but of will.

299. At the same time, telecommunications companies continue to fall short in public engagement. Accessible wireless plans, IP Relay apps, and accessibility features are rarely promoted, leaving many Canadians unaware they even exist. More troubling, innovations already standard in the United States, such as VRS interpreter integration directly into Zoom, have yet to be adopted in Canada. These gaps are not technical limitations but failures of leadership. The CRTC must step in and mandate these actions. Promotion and deployment of accessibility tools cannot remain optional or left to chance, they must be regulatory requirements.
300. Promotion alone, however, will not solve the problem. Cost and funding reforms are equally urgent. Accessibility-related expenses, ASL/LSQ interpretation, captioning, plain-language formatting, translanguaging, Deaf and Deaf-Blind consultant expertise, all of which must be recognized as recoverable and protected within the Commission's cost framework. Without clear mechanisms, equity-seeking groups cannot sustain their participation. A dedicated category for accessibility costs, explicit protection from reductions or challenges, simplified applications, and faster reimbursement timelines are not luxuries. They are preconditions for meaningful engagement.
301. If these measures had already been in place, there would be no need for us to return proceeding after proceeding, repeating ourselves like a squeaky wheel on an endless track. And yet, until reforms are made, we will not go away. We will continue pressing until our input is heard and genuine action takes hold.
302. Despite years of advocacy, the CRTC still has only one declared Deaf employee, and that individual is not tasked with engaging the public. There is no Accessibility Office to provide one-on-one support for new consultants and public-interest participants. There are no dedicated workshops or direct video communications in ASL and LSQ to guide consultants and analysts. Without such structural commitments, **the Commission risks remaining a follower rather than becoming a leader**, especially when compared to the United States, where the Federal Communications Commission has established a Disability Rights Office that sets the standard for accessibility and accountability.
303. Accessibility is no longer about catching up. It is about moving ahead with urgency, embedding accessibility as the foundation of telecommunications and broadcasting in Canada, and ensuring that Deaf, DeafBlind, and Hard of Hearing Canadians finally receive equitable treatment. **Enough delay - the time to act is now.**

Appendix A:

Infographic Panels

Accessibility lens is applied to ensure telecommunications and broadcasting policies are inclusive of Deaf, DeafBlind, and Hard of Hearing Canadians.



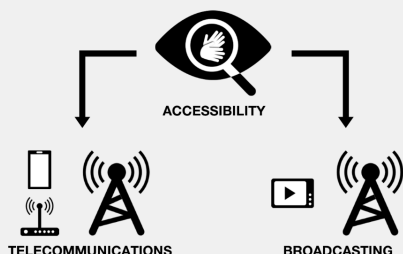
Established on
July 15, 2015



15+ members from
diverse backgrounds



Sharing knowledge
and lived experiences



30+ CRTC Proceedings via
writing and public hearings

Advancing **full accessibility** by ensuring equitable access to information, communication, sign languages, network coverage, and emergency services.



COVERAGE

Advancing **digital inclusion** through accessibility plans, strong signal and speed, outage transparency, two-way sync, public alert access, and anti-throttling measures.



VIDEO RELAY SERVICES

Giving feedback on the Video Relay Services, including service delivery and budget utilization, to ensure accountability and **communication accessibility**.



DIRECT VIDEO COMMUNICATION

Accessible service delivery and complaint feedback processes in American Sign Language and la langue des signes québécoise.



CAPTIONING

Improving closed captioning by increasing accuracy, availability, and visual customization to ensure equitable **information accessibility**.



SIGN LANGUAGES-BASED BROADCASTING

Advancing **sign language accessibility** by supporting American Sign Language and la langue des signes québécoise content creation and **Deaf-led media**.



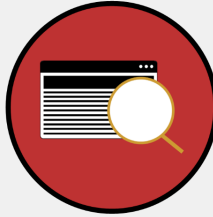
3-DIGIT CRISIS CALLS

Enhancing **emergency accessibility** of next-generation **9-1-1**, emergency network reliability, and **9-8-8** services for mental health crisis and suicide prevention.

Contributes expertise in literature research, survey analysis, **lived experience** consultations and interviews, and report writing to deliver **evidence-based**, inclusive, and actionable insights.



CONSULTATIONS



RESEARCH



225+ DOCUMENTS



12 SURVEYS



INTERVIEWS



7 PUBLIC HEARINGS

Deaf, Deaf-Blind, and Hard of Hearing experts/professionals were contracted for their **unique skillset** and to share their **lived experiences**.



ANALYSIS



CONSULTANCY



GRAPHIC DESIGN



TRANSLATIONS



Costs awards in 22 CRTC proceedings with **71 detailed submissions**



Highest cost awarded for **Wireless Accessibility** proceeding


BTNC 2020-81	18.0 months
TNC 2021-102	17.5 months
TNC 2022-65	15.5 months
TNC 2016-116	11.5 months
TNC 2017-33	11.5 months
TNC 2020-178	11.0 months
TNC 2015-134	10.0 months
TNC 2020-124	10.0 months
TNC 2023-39	10.0 months
TNC 2018-246	9.0 months
TNC 2020-236	7.0 months
TNC 2021-191	7.0 months
TNC 2016-293	6.5 months
TNC 2018-98	6.5 months
TNC 2018-422	5.5 months
TNC 2021-69	5.0 months
TNC 2025-20	3.5 months
BNC 2024-137	2.0 months
BNC 2024-288	1.5 months
BNC 2025-48	1.0 month

2015

1

TNC 2015-134

Review of basic telecommunications services




Application date: July 11, 2016
Cost award date: May 5, 2017

Time between: 10 months

2

TNC 2015-305

Matters related to the reliability and resiliency of the 9-1-1 networks



Application date: None
Cost award date: None


Did not apply

2016

3

TNC 2016-115

Participation by wireless service providers in the National Public Alerting System



Application date: None
Cost award date: None

Did not apply

4

TNC 2016-116

Establishment of a regulatory framework for next-generation 9-1-1 in Canada



Application date: March 3, 2017
Cost award date: February 16, 2018

Time between: 11.5 months

5

TNC 2016-293

Review of the Wireless Code



Application date: April 12, 2017
Cost award date: October 25, 2017


Time between: 6.5 months

2017

6

TNC 2017-33

Review of the regulatory framework for text-based message relay services




Application date: December 7, 2017
Cost award date: November 26, 2018

Time between: 11.5 months

7

BNC 2017-359

Governor in Council's request for a report on future programming distribution models



Application date: None
Cost award date: None

Did not apply

2018

8

TNC 2018-98

Lower-cost data-only plans for mobile wireless services



Application date: November 9, 2018
Cost award date: May 21, 2019

Time between: 6.5 months

9

TNC 2018-246

Report regarding the retail sales practices of Canada's large telecommunications carriers



Application date: December 14, 2018
Cost award date: September 26, 2019

Time between: 9 months

10

TNC 2018-422

Proceeding to establish a mandatory code for Internet services




Application date: June 24, 2019
Cost award date: December 12, 2019

Time between: 5.5 months

2019

11 **TNC 2019-57**

Review of mobile wireless services



Application date: None
Cost award date: None
Time between: None

2020

12 **BTNC 2020-81**

Provision of paper bills by communications service providers



Application date: August 21, 2020
Cost award date: February 17, 2022
Time between: 18 months

13 **TBNC 2020-124**

Regulations to be made under the Accessible Canada Act



Application date: July 20, 2020
Cost award date: May 13, 2021
Time between: 10 months

14 **TNC 2020-178**


Accessibility - Mobile wireless service plans that meet the needs of Canadians with various disabilities



Application date: April 8, 2022
Cost award date: March 9, 2023
Time between: 11 months

15 **TNC 2020-326**

Establishment of new deadlines for Canada's transition to next-generation 9-1-1



Application date: December 4, 2020
Cost award date: July 9, 2021
Time between: 7 months

2021

16 **TBNC 2021-69**

The Canada Radio-television and Telecommunications Commission Accessibility Reporting Regulations



Application date: April 30, 2021
Cost award date: October 29, 2021
Time between: 5 months

17 **TNC 2021-102**


Review of video relay service - Changes to procedure



Application date: December 4, 2023
Cost award date: May 14, 2025
Time between: 17.5 months

18 **TNC 2021-191**

Introduction of a three-digit abbreviated dialing code for mental health crisis and suicide prevention services




Application date: April 15, 2022
Cost award date: November 7, 2022
Time between: 7 months

2022

19 **TNC 2022-65**

Funding next-generation 9-1-1 access services through the National Contribution Fund




Application date: August 1, 2022
Cost award date: November 17, 2023
Time between: 15.5 months

2023

20

TNC 2023-39

Mandatory notification and reporting about major telecommunications service outage



Application date: February 2, 2024
Cost award date: November 27, 2024


Time between: 10 months

2024

21

BNC 2024-137

Development of a regulatory policy for closed captioning provided by online streaming undertakings



Application date: March 7, 2025
Cost award date: April 30, 2025

Time between: 2 months

22

BNC 2024-288

Defining "Canadian program" and supporting the creation and distribution of Canadian programming



Application date: July 23, 2025
Cost award date: September 8, 2025

Time between: 1.5 months

23

TNC 2024-293

Making it easier to choose a wireless phone or Internet service - Enhancing customer notification




Application date: April 11, 2025
Cost award date: Pending

Time between: Pending

24

TNC 2024-294

Making it easier to choose a wireless phone or Internet service - Removing barriers to switching plans



Application date: April 12, 2025
Cost award date: Pending

Time between: Pending

25

TNC 2024-295

Making it easier to choose a wireless phone or Internet service - Enhancing self-service mechanisms




Application date: April 13, 2025
Cost award date: Pending

Time between: Pending

26

TNC 2024-318

Making it easier for consumers to shop for Internet services



Application date: Not yet applied
Cost award date: Pending


Time between: Pending

2025

27

BNC 2025-2

The Path Forward - Working towards a sustainable Canadian broadcasting system




Application date: Not yet applied
Cost award date: Pending

Time between: Pending

28

TNC 2025-20

Improving the routing of 9-8-8 calls and texts




Application date: May 12, 2025
Cost award date: August 26, 2025

Time between: 3.5 months

29

BNC 2025-48

Notice of application received



Application date: April 18, 2025
Cost award date: May 18, 2025

Time between: 1 month

Appendix B:

Interview Questions

Senior Consultants and Accessibility Consultants

Senior Consultants

Written Questions for Email

- 1. Please describe your role in preparing or managing the cost application for CAD-ASC in this proceeding.**
- 2. How would you summarize your overall experience navigating the CRTC cost application process?**
- 3. Were the Commission's instructions and requirements clear at the outset?**
- 4. What challenges, if any, did you face in compiling documentation for hours worked, disbursements, and supporting evidence?**
- 5. Did you encounter any difficulty determining which costs were eligible, particularly for accessibility-related expenses such as interpretation or accessible document preparation?**
- 6. Were any costs disallowed or reduced unexpectedly? If so, what explanation, if any, was provided?**
- 7. How did the process account for accessibility-related work compared to other costs?**
- 8. In your view, does the current process adequately support public interest and accessibility-focused groups?**
- 9. How did the reimbursement outcome affect CAD-ASC's ability to participate in future CRTC proceedings?**
- 10. What specific improvements to the cost application framework would you recommend to ensure greater fairness, transparency, and accessibility?**

Senior Consultants

Interview Questions – Cost Application Process (2025-94)

1. Background & Context

1. Can you briefly describe your role in the cost application process for this proceeding?
2. How long have you been involved in preparing or managing cost applications for public interest participation at the CRTC?

2. Process Experience

3. How would you describe your overall experience navigating the cost application process for CAD-ASC?
4. Were the Commission's instructions and requirements clear from the outset?
5. How easy or difficult was it to compile and submit the necessary documentation (e.g., hours worked, disbursements, supporting evidence)?

3. Barriers & Challenges

6. What were the biggest challenges you faced during the cost application process?
7. Did you encounter any issues with understanding eligibility for certain costs (e.g., accessibility-related disbursements, RFI work)?
8. Were there any unexpected rejections, reductions, or disallowances of costs? If so, were explanations provided?
9. Did timing or procedural requirements create difficulties for your organization?

4. Accessibility & Inclusion

10. Were there sufficient opportunities to request and receive accommodations during the cost application process?

11. Did the process account for accessibility-related work (e.g., ASL/LSQ interpretation, captioning, accessible document preparation) in a fair and transparent way?
12. How did the Commission treat costs related to accessibility supports compared to other types of costs?

5. Financial Impact

13. How did the reimbursement (or lack thereof) affect your organization's ability to participate in future proceedings?
14. Were there out-of-pocket expenses or voluntary contributions of time that were not recovered?

6. Lessons & Recommendations

15. What changes would you recommend to the CRTC's cost application framework to better support public interest and accessibility-focused groups?
16. How could the process be made more predictable, transparent, and fair for smaller organizations?
17. Do you believe the proposed changes under CRTC 2025-94 will address the issues you experienced? Why or why not?

7. Final Reflections

18. In your view, does the current cost application process support or hinder meaningful public interest participation?
19. What would make you more confident in applying for costs in future CRTC proceedings?
20. Is there anything else from your experience that you think the record for 2025-94 should reflect?

Accessibility Consultants

Interview Questions – Accessibility of Cost Application Forms & Process (2025-94)

1. General Experience

- How would you describe your overall experience with the accessibility of the CRTC's cost application forms and process?
- Did you find the forms and instructions easy to navigate, or were there barriers?

2. Format & Usability

- Were the forms provided in accessible formats (e.g., screen reader-friendly, plain language, compatible with assistive technology)?
- Did you encounter any difficulties filling them out due to formatting, layout, or technical issues?
- If you needed alternate formats (e.g., large print, Word vs PDF), were they available or easy to request?

3. Instructions & Clarity

- Were the Commission's instructions written in plain, accessible language?
- Did you feel the guidance documents explained the requirements clearly, or were they overwhelming/complex?
- Were accessibility-related disbursements (e.g., interpretation, captioning, document preparation) explained clearly in terms of eligibility?

4. Support & Accommodations

- Were you aware of options to request accommodations while preparing or submitting the application?
- If you asked for support (e.g., clarification, help desk, CRTC staff guidance), was it accessible and responsive?
- Did you feel the CRTC anticipated the needs of Deaf and disability organizations in this process?

5. Barriers & Challenges

- What were the biggest accessibility-related challenges you faced in the process?
- Were there any steps where the process created unnecessary barriers (e.g., digital submission platforms, proof of hours, disbursement documentation)?

6. Recommendations

- What improvements would you suggest to make the forms and process more accessible for organizations like DWCC, CNSDB, DBPC, or even CAD-ASC?
- Would you recommend changes to the forms themselves, the guidance documents, or the submission process?
- Do you believe the proposed changes under CRTC 2025-94 will adequately address accessibility issues?

7. Final Reflections

- Do you feel the current cost application framework enables equitable participation for accessibility-focused organizations?
- Is there anything else from your experience with accessibility of the forms and process that should be part of the public record?

In other words - simplified:

ASL Interview Prompts – Accessibility of Cost Application Forms & Process

- Tell me about your experience using the CRTC cost application forms.
- Were the forms easy to use or did you find barriers?
- Did the forms work with accessibility tools (like screen readers, different formats, plain language)?
- Were the instructions clear or confusing?
- **How were accessibility-related costs (interpreters, captioning, accessible documents) explained?**
- Did you know how to ask for accommodations if you needed them?
- If you asked for help, was the support accessible and useful?
- **What parts of the process were the hardest for accessibility?**
- **What changes would make the forms and process easier for Deaf and disability groups?**
- **Do you think the CRTC's new plan (2025-94) will fix these issues? Why or why not?**
- **Do you feel the process supports equal participation, or does it create barriers?**
- **Anything else about your experience that should be shared?**

Reference Links

Proceeding: [Broadcasting and Telecom Notice of Consultation CRTC 2025-94](#)

ASL videos link : [click here](#)

Appendix C:
TDI Conference 2023
Correspondence & Documentation

Correspondence Chronology: DWCC Sponsorship Requests for TDI Conference 2023

Date	Sender	Recipient(s)	Summary of Correspondence
Apr 27, 2023	Lisa Anderson (DWCC)	Ursula Grant (CTA), cc: CRTC (Nanao Kachi), Bell, Rogers, TELUS	Initial sponsorship request to support DWCC attendance at TDI Conference 2023 .
May 4, 2023	Ursula Grant (CTA)	Lisa Anderson (DWCC), cc: CRTC, Bell, Rogers, TELUS	CTA declined funding; suggested DWCC attend the Canadian Telecom Summit instead .
Jul 21, 2023	Jeffrey Beatty (DWCC)	Rogers (Ted Woodhead, Regulatory), TELUS (Stephen Schmidt), Bell (Mirko Bibic, Philippe Gauvin), cc: CRTC	Follow-up sponsorship requests sent directly to carriers .
Aug 24, 2023	Eric Edora (TELUS)	Jeffrey Beatty (DWCC), cc: CRTC	TELUS required applications through sponsorship portal; quarterly review cycle .
Aug 25, 2023	Jeffrey Beatty & Leonor Vlug (DWCC)	Internal DWCC correspondence	Discussed TELUS's response; noted retroactive funding unlikely .
Sept 7, 2023 (AM)	Ruth Altman (Rogers)	Jeffrey Beatty (DWCC), cc: Regulatory contacts	Rogers declined support; referred DWCC to general community grant programs .

Sept 7, 2023 (PM)	Bell Regulatory (Philippe Gauvin)	Jeffrey Beatty (DWCC), cc: CRTC	Bell declined support; funding restricted to registered charities under <i>Bell Let's Talk</i> .
Nov 15, 2023	DWCC (Jeff Beatty, Lisa Anderson)	CRTC staff (Nanao Kachi, Sébastien Trottier)	Meeting confirmed DWCC spent \$11,500 out-of-pocket for TDI; Nanao advised costs should be included in a future cost proceeding .

Exhibit A: DWCC Letter to CTA - April 27, 2022 - Page 1



DEAF WIRELESS CANADA CONSULTATIVE COMMITTEE
COMITÉ POUR LES SERVICES SANS FIL DES SOURDS DU CANADA
OTTAWA, ONTARIO

Ursula Grant
Vice President, Industry and Consumer Affairs
Canadian Wireless Telecommunications Association (CWTA)
180 Elgin Street, Suite 1100
Ottawa, Ontario K2P 2K3

By email: ugrant@cwta.ca

April 26, 2023

Dear Ursula,

Re: Request for Sponsorship to attend an Accessible Conference on Telecommunications

We seek sponsorships for the DWCC to attend the upcoming [TDI Conference 2023](#), from July 27-29, 2023, in Maryland, United States. In full transparency, this letter is also being sent to the CRTC and the three most prominent Canadian companies, Rogers, Telus, and Bell.

About TDI, Inc.

Telecommunications for the Deaf and Hard of Hearing, Inc. ([TDI](#)) is the only telecommunications organization for the Deaf and hard of hearing in North America, with a fully operating board. This organization fully participates in FCC public policy processes and community involvement. The guiding purpose of the TDI is that Information and Communications Technologies need to provide DHH people with the level of access and ease experienced by the general population. TDI's Mission is to foster full accessibility, equity, and inclusion in information and communications technology (ICT). Its vision is that all individuals and communities have full access to and equitable participation in information and communication.

TDI Biennial Conferences

The 2023 Biennial Conference theme is "*Digital Inclusion for All*." It includes up to 9 Plenaries, 12 Presentations, and Over 100 speakers, including the FCC CEO and Chairperson, Jessica Rosenworcel. Topics include Telecommunications, Accessible Technology, Education, Government, Employment, and Health. It looks, once again, to be a very impressive lineup of presentations and opportunities to network and learn.

In the past, we have learned and benefited from these conferences, and the information we gain has direct benefits and applications to Canada's technology and telecommunications accessibility. We aim to create a dialogue for establishing a similar conference in Canada, and currently just seeking sponsorship for our junior and senior consultant members to attend this summer's conference.

Exhibit A: DWCC Letter to CTA - Page 2

Our organization promotes and advocates for accessibility for individuals with disabilities, specifically Deaf, Deaf-Blind, and Hard of Hearing Canadians. Attending this conference will offer our members invaluable opportunities to learn about new technologies, share ideas, and network with professionals in the field. As the DWCC has engaged more junior consultants, we face the challenge of getting them up to speed on telecommunication accessibility issues and updating the leads on current issues to bring back to Canada.

This letter will outline our group's issues and challenges as we continue our work. The CWTA is familiar with the Deaf Wireless Canada Consultative Committee (DWCC), its eight years of work, participation in 19 CRTC telecommunications and broadcasting proceedings, and submitting ten qualitative and quantitative surveys that provided recommendations to the CRTC on topics such as wireless accessibility and video relay services. Please visit our website's Mandate page for more information about our Committee.

In Canada, numerous telecommunications conferences take place. However, groups like the DWCC struggle to access these events due to [exorbitant](#) registration fees, lack of accessibility-related topics, and reluctance to provide accessibility measures such as sign language interpreters. It is time for the telecommunications industry to support our groups in obtaining and creating professional development opportunities, considering the [Accessible Canada Act](#) and the [2023 Policy Direction](#) with accessibility applications.

In return for your sponsorship, we will include your organization's logo in our conference materials and publicly acknowledge your support. Our team has applied to present a workshop topic to share the Canadian experience with public policy, and two junior consultants will attend for professional development. Our senior consultants will mentor junior consultants, including the Indigenous consultant. The DWCC intends to collect information and is willing to provide a presentation summary to share with all the sponsors.

We hope to secure sponsorship for registration and conference travel costs, including air travel, accommodations, and conference registration fees. We would be grateful if the CWTA, Rogers, Telus, and Bell agreed to contribute a sponsorship of **\$11,761.30**. If you would like a breakdown of this cost, please e-mail us, and we will be happy to supply details.

Thank you for considering our request. We believe that your support will make a real difference in the lives of individuals with disabilities, and we look forward to the possibility of working with you to make this venture a success and creating an opportunity to host a conference in Canada in the near future.

Sincerely,



Lisa Anderson

Chair, Deaf Wireless Canada Consultative Committee

Cc: Nanao Kachi, Director, CRTC Social and Consumer Policy
Howard Slawner, Vice President, Regulatory Telecom, Rogers Communications, Inc.
Stephen Schmidt, Vice President, Telus Telecom Policy & Regulatory Affairs
Jacques Brazeau, Bell Regulatory Affairs
Philippe Gauvin, Assistant General Counsel, Bell Mobility

Exhibit B: CTA Email Reply to DWCC



Ursula Grant

May 4, 2023 at 2:19 PM

RE: Sponsorship Request for TDI Conference 2023

To: Lisa Anderson, Cc: Nanao Kachi, Rogers-Telecom Regulatory, Regulatory, Bell Canada & 2 more

[Details](#)

Hi Lisa,

I hope you are keeping well.

The Association is not able to provide DWCC with funding to attend the TDI conference. As you are aware, we are a non-profit organization, so we plan and develop our budget annually based on identified projects and needs; our budget for the 2022/23 fiscal year has been fully allocated.

I would also note that the Association's focus is on the Canadian industry, including building knowledge and understanding of the industry. In my view, while it's helpful to know what may be occurring in the US, the regulatory environment is sufficiently different in Canada and, even when the topics may be the same, the information and approaches are not generally transferable. As it relates to accessibility, the ACA and CRTC regulations have identified service provider obligations that are relevant in Canada.

Your letter identifies that you are looking for opportunities "to learn about new technologies, share ideas, and network with professionals in the field". To that end, you may want to consider attending the Canadian Telecom Summit (CTS). I appreciate that you are trying to build expertise amongst your junior staff, and attending events like CTS might be an effective way of accomplishing that goal as it would allow you to build a stronger foundation concerning the Canadian context. In case cost is a concern, I will raise your letter with my colleague Katherine. She sits on the CTS advisory committee and may be able to help advocate for greater inclusion from CTS.

I would be happy to provide updates to you concerning CTS if you are interested. (It is currently scheduled for November 6-8, 2023 in Toronto.)

Kind regards,

Ursula Grant

VP, Industry and Consumer Affairs | Vice-présidente, Industrie et consommation

Canadian Telecommunications Association | Association canadienne des télécommunications

1100-180 rue Elgin Street, Ottawa, ON K2P 2K3

ugrant@canadatelecoms.ca | canadatelecoms.ca | (613) 233-4888 x 208

We've rebranded! CWTa is now the Canadian Telecommunications Association. Check out our press release [here](#) for more information. | Nous avons changé de nom ! L'ACTS est maintenant l'Association canadienne des télécommunications. Consultez notre communiqué de presse [ici](#) pour plus d'informations.

Exhibit C: Bell Response to DWCC - Sept 7, 2022



7 September 2023

Mr. Jeffrey Beatty
Acting Chairperson
DWCC – CSSSC Ottawa, Ontario

Via email: regulatory@deafwireless.ca

Subject: **TDI Conference Sponsorship**

Dear Mr. Beatty,

This letter acknowledges receipt and review of your sponsorship request for the TDI Conference.

Bell is committed to accessibility initiatives, including those outlined as part of our multi-year accessibility plan. Prepared in accordance with the *Accessible Canada Act* our accessibility plan reflects information acquired through our consultations with persons with disabilities, and details the actions we are taking to improve accessibility at Bell. You can learn more about our commitments to accessibility at the following link, where the plan is also available in ASL as an alternate format: https://bce.ca/Accessibility_services/Accessibility_plan.

Bell's community activities are focused on mental health projects in support of the Bell Let's Talk mental health initiative. The majority of our funding is directed to projects that support our four action pillars, anti-stigma, care and access, research and workplace mental health. In addition, any funding is directed towards registered charitable Canadian organizations and our policy excludes funding for advocacy groups.

As a result of our focus areas and current commitments, we are unable to support your funding request. You can learn more about the Bell Let's Talk initiative and the types of projects we have funded at this link: <https://letstalk.bell.ca/en/>.

Yours truly,

[Original signed by P. Gauvin]

Philippe Gauvin
Assistant General Counsel

c.c.: Nanao Kachi, CRTC

END OF DOCUMENT