

Telecom Notice of Consultation CRTC 2024-295-1

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Reference: 2024-295

Ottawa, 20 December 2024

Public record: 1011-NOC2024-0295

Call for comments – Making it easier to choose a wireless phone or Internet service – Enhancing self-service mechanisms – Changes to procedure

Revised deadline for submission of interventions: 12 March 2025

Revised deadline for submission of replies: 26 March 2025

[Submit an intervention or view related documents]

Changes to procedure

- 1. On 23 November 2024, the Deaf Wireless Canada Committee (DWCC) submitted a procedural request for key elements of Telecom Notices of Consultation 2024-293, 2024-294, and 2024-295 (the notices) to be translated into American Sign Language (ASL) and Langue des signes québécoise (LSQ). The DWCC also requested to extend the intervention deadline of the notices by nine weeks from the time the ASL and LSQ videos are posted. It argued that this extension is necessary to allow it sufficient time to complete a survey of Deaf, Deaf-Blind, and Hard of Hearing (DDBHH) individuals on the issues raised in the notices and to submit a report of their findings.
- 2. On 28 November 2024, Bell Canada, Bragg Communications Inc., carrying on business as Eastlink, Cogeco Communications Inc., and Rogers Communications Canada Inc. (collectively, "the companies") submitted a procedural request supporting the DWCC's request for an extension. The companies requested that the intervention period for all parties for the notices be extended to 28 February 2025 and that the reply periods be extended to 14 March 2025. The DWCC supported this procedural request.
- 3. In the notices, the Commission launched proceedings to address pressing public policy issues that, given recent market activities, are having an immediate impact on Canadians struggling with the cost of living. It is important that this proceeding move forward in a timely manner because recent amendments to the *Telecommunications Act* require specific consumer protections to address the concerns of Canadians.



- 4. The Commission considers that an intervention period that is longer than originally planned is appropriate to ensure fulsome participation by all interested persons. However, this must be balanced with the need to address the pressing issues for Canadians raised in Telecom Notice of Consultation 2024-295. In fact, the Commission has already received significant interventions from the public as part of this proceeding.
- 5. The Commission values informed input from the DDBHH community. For this reason, the Commission's general practice is to translate information from its notices into Sign language when there are direct accessibility issues in the proceeding. Translation of notices is an important tool that can help Sign language users participate in the Commission's proceedings.
- 6. While important, Sign language translation is a complex and lengthy process. Even with the extended deadlines proposed by the companies, any Commission translation of the notices into ASL or LSQ may not be available in time. Setting a deadline that could be subject to additional changes or suspending the deadlines and then relaunching the proceedings would add regulatory complexity and uncertainty.
- 7. In this case, the DWCC indicated that it plans to create a survey and canvass the DDBHH community on the issues raised in this notice concerning enhancing self-service mechanisms, which raised specific accessibility-related issues. It also plans to translate its survey into Sign language. In other circumstances, this would simply be a supplement to the Commission's own Sign language translations. In these circumstances, however, the survey can be relied on to provide Sign language users with sufficient information to understand the issues and participate in the proceeding, while balancing the need to move forward with these pressing issues in a timely way. In its analysis of the substantive issues in this proceeding, the Commission will take into account the fact that the DWCC's survey was the principal means by which evidence from Sign language users was gathered.
- 8. In light of the above, the Commission extends the deadline to submit interventions in Telecom Notice of Consultation 2024-295 to **12 March 2025** and extends the deadline to submit replies to **26 March 2025**.

Secretary General

Related documents

- Call for comments Making it easier to choose a wireless phone or Internet service Enhancing self-service mechanisms, Telecom Notice of Consultation CRTC 2024-295, 22 November 2024
- Call for comments Making it easier to choose a wireless phone or Internet service Removing barriers to switching plans, Telecom Notice of Consultation CRTC 2024-294, 22 November 2024

• Call for comments – Making it easier to choose a wireless phone or Internet service – Enhancing customer notification, Telecom Notice of Consultation CRTC 2024-293, 22 November 2024