



## Telecom Notice of Consultation CRTC 2023-39-1

PDF version

Reference: 2023-39

Ottawa, 11 September 2023

*Public record: 1011-NOC2023-0039*

### **Call for comments – Development of a regulatory framework to improve network reliability and resiliency – Mandatory notification and reporting about major telecommunications service outages – Changes to procedure**

#### **Changes to procedure to enable submission of sign language video interventions**

**Deadline for the submission of interventions in sign language: 3 October 2023**

**Deadline for the submission of replies to sign language interventions: 10 days from posting of sign language intervention transcripts on the Commission's website. Interveners will be advised when the transcripts have been posted on the Commission's website.**

1. The Commission issued *Call for comments – Development of a regulatory framework to improve network reliability and resiliency – Mandatory notification and reporting about major telecommunications service outages*, Telecom Notice of Consultation CRTC 2023-39, 22 February 2023 (Telecom Notice of Consultation 2023-39), in which it initiated a proceeding to set a requirement for all Canadian carriers to (i) notify the Commission, Innovation, Science and Economic Development Canada (ISED), and other relevant authorities of major service outages, and (ii) submit a comprehensive post-outage report to the Commission.
2. On 20 March 2023, the Commission received a procedural request from the Deaf and Hard of Hearing Coalition (DHH Coalition), which is composed of the Deafness Advocacy Association Nova Scotia, the Newfoundland and Labrador Association of the Deaf and the Ontario Association of the Deaf, to amend the procedure in the proceeding initiated by Telecom Notice of Consultation 2023-39. Specifically, the DHH Coalition requested that the Commission
  - issue Telecom Notice of Consultation 2023-39 in sign language format;
  - modify this proceeding to allow interested parties to submit their interventions and replies in sign language;

- provide interested parties sufficient time to create videos in sign language, and ensure that all parties have the opportunity to review the transcripts of these videos; and,
  - modify the deadlines for interventions and replies to interventions accordingly.
3. The DHH Coalition submitted that in Telecom Notice of Consultation 2023-39, the Commission is seeking comments on matters related to notification and reporting requirements for Canadian carriers in connection with major service outages; this includes requirements for the release of information on disrupted services, their causes and relevant timelines, all of which affect Deaf and Hard of Hearing consumers. The DHH Coalition therefore submitted that the modifications included in its procedural request will result in a fulsome public record forming a strong basis for the Commission's eventual determinations.
  4. On 22 March 2023, the Commission received letters from the Canada Deaf Grassroots Movement and the Public Interest Advocacy Centre in support of the DHH Coalition's request.
  5. The Commission recognizes that certain issues raised in Telecom Notice of Consultation 2023-39, including those pertaining to accessibility services in the event of a service outage, are of particular interest for Canadians who are Deaf or Hard of Hearing. The Commission considers that adopting certain measures that would facilitate participation in this proceeding would help develop a fulsome record on these particular issues.
  6. Accordingly, the Commission is modifying the procedure of this proceeding to facilitate participation by Canadians who are Deaf or Hard of Hearing, and to enable the submission of interventions in American Sign Language (ASL) and Langue des signes québécoise (LSQ) in video format. In addition, the procedure is being amended to allow for the submission of reply comments by all interveners to the ASL and LSQ video interventions only.
  7. The following key information, of particular interest for Canadians who are Deaf or Hard of Hearing, is being issued with this notice in ASL and LSQ video format:
    - A summary of Telecom Notice of Consultation 2023-39;
    - Paragraph 24 of Telecom Notice of Consultation 2023-39, which contains all of the questions on which the Commission is seeking comments;
    - The procedure for ASL and LSQ video intervention submissions; and
    - The deadline for the submission of reply comments by all interveners to the ASL and LSQ video interventions
  8. These videos are now available in ASL and LSQ on the Commission's [website](#).

9. The Commission invites Canadians who are Deaf or Hard of Hearing, and their representatives, to present their comments on the issues under consideration in ASL or LSQ in video format if they so choose. The Commission will transcribe the ASL and LSQ interventions filed for this proceeding and the transcripts will be posted on the Commission's website to facilitate the reply comments process for all interveners.

### **Revised deadlines**

10. Interventions may be filed in ASL or LSQ by Canadians who are Deaf or Hard of Hearing, or their representatives by **3 October 2023**. Interventions may only address the matters outlined in paragraph 24 of Telecom Notice of Consultation 2023-39.
11. All parties may file a reply to interventions filed in sign language within 10 days from the date of posting the transcripts of video interventions on the Commission's website. All interveners will be advised when the transcripts have been posted on the Commission's website.
12. Replies must respond only to the ASL or LSQ interventions (video or transcripts) submitted pursuant to this procedure and may not address interventions or replies previously filed pursuant to the original procedure set out in Telecom Notice of Consultation 2023-39.
13. Submissions must be filed by sending them to the Secretary General of the Commission using **only one** of the following means:

**by completing the**  
[\[Intervention form\]](#)

or

**by mail to**  
CRTC, Ottawa, Ontario K1A 0N2

or

**by fax to**  
819-994-0218

or

**by ASL or LSQ video using the**  
[\[Intervention form\]](#)

### **Revised procedure for video submissions**

14. The Commission will accept interventions and replies in ASL and LSQ for this proceeding. Interested persons must provide a working link to a publicly viewable version of their video in the comments box in the "Submit an intervention" section of

the Intervention form. All other submission procedures are the same as for written interventions, which are set out in Telecom Notice of Consultation 2023-39.

15. The Commission will post English transcripts of ASL videos and French transcripts of LSQ videos on its website. These transcripts, along with the corresponding videos, will constitute the intervention or reply as the case may be. Links to videos will be made public when the transcripts are posted on the Commission's website. Intervenors may choose to submit written transcripts with their videos to facilitate the process.
16. For videos longer than 15 minutes, a brief summary should be provided at the beginning of the video.
17. The information that parties provide to the Commission as part of this public process is entered into an unsearchable database dedicated to this specific public process. In the case of information submitted via ASL or LSQ videos, the transcripts of these videos will also be entered into the unsearchable database. This database is accessible only from the web page of this particular public process. As a result, a general search of the Commission's website with the help of either its search engine or a third-party search engine will not provide access to the information that was provided as part of this public process. However, because individuals who submit an ASL or LSQ video intervention or reply must submit a working link to a publicly viewable version of their video to the Commission, depending on where the video was uploaded, any intervention or reply submitted via ASL or LSQ video may be searchable by a third-party search engine.

Secretary General