



## Telecom Order CRTC 2025-183

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Gatineau, 23 July 2025

*File numbers: 1011-NOC2024-0318 and 4754-776*

### **Determination of costs award with respect to the participation of the Canada Deaf Grassroots Movement in the proceeding initiated by Telecom Notice of Consultation 2024-318**

#### **Application**

1. By letter dated 21 April 2025, the Canada Deaf Grassroots Movement (CDGM) applied for costs with respect to its participation in the proceeding initiated by Telecom Notice of Consultation 2024-318 (the proceeding). In the proceeding, the Commission sought comments on making shopping for home Internet services easier for Canadians.
2. The CDGM submitted that it had met the criteria for an award of costs set out in section 68 of the *Canadian Radio-television and Telecommunications Commission Rules of Practice and Procedure* (the Rules of Procedure) because it represented a group or class of subscribers that had an interest in the outcome of the proceeding, it had assisted the Commission in developing a better understanding of the matters that were considered, and it had participated in a responsible way.
3. In particular, the CDGM submitted that it represents the interests of Deaf, Deaf Indigenous, Hard of Hearing, and Deaf-Blind (DDIHHDB) consumers across Canada. The CDGM explained that DDIHHDB individuals are directly impacted by the accessibility and clarity of Internet service comparison tools and self-service platforms.
4. The CDGM requested that the Commission fix its costs at \$2,475, consisting entirely of analyst fees. The CDGM filed a bill of costs with its application.
5. The CDGM claimed 22.5 hours at a rate of \$110 per hour for two external junior analysts to conduct file review, prepare interventions and comments, prepare reply comments, and prepare the costs application for a total of \$2,475.
6. The CDGM submitted that the telecommunications service providers (TSPs) who participated in the proceeding are the most appropriate parties to be required to pay any costs awarded by the Commission (the costs respondents).
7. The Commission did not receive any interventions in response to the application for costs.

## Commission's analysis

8. The criteria for an award of costs are set out in section 68 of the Rules of Procedure, which reads as follows:
  68. The Commission must determine whether to award final costs and the maximum percentage of costs that is to be awarded on the basis of the following criteria:
    - (a) whether the applicant had, or was the representative of a group or a class of subscribers that had, an interest in the outcome of the proceeding;
    - (b) the extent to which the applicant assisted the Commission in developing a better understanding of the matters that were considered; and
    - (c) whether the applicant participated in the proceeding in a responsible way.
9. In Telecom Information Bulletin 2016-188, the Commission provided guidance regarding how an applicant may demonstrate that it satisfies the first criterion with respect to its representation of interested subscribers. In the present case, the CDGM has demonstrated that it meets this requirement. The CDGM submitted it represents the interests of DDIHHDB consumers and that this group has an interest in the proceeding. The CDGM also submitted that decisions affecting the accessibility and clarity of comparison tools and self-service online platforms and information have a direct impact on the ability of DDIHHDB consumers to independently and confidently make informed choices about Internet services.
10. The CDGM has also satisfied the remaining criteria through its participation in the proceeding. In particular, the CDGM's submissions provided information on how current Internet service shopping tools and self-service online platforms can be made more accessible for DDIHHDB consumers, which helped the Commission in developing a better understanding of the matters that were considered. The CDGM emphasized the importance of providing Internet plan details in accessible formats, so DDIHHDB consumers can independently choose Internet services that meet their needs without facing communication or technological barriers. The CDGM also submitted that it participated in a responsible way by submitting punctual, active, focused, and structured contributions that offered a unique point of view on the issues under consideration.
11. The rates claimed in respect of analyst fees are in accordance with the rates established in the *Guidelines for the Assessment of Costs*, as set out in Telecom Regulatory Policy 2010-963. The Commission finds that the total amount claimed by the CDGM was necessarily and reasonably incurred and should be allowed.

12. The Commission has generally determined that the appropriate costs respondents to an award of costs are the parties that have a significant interest in the outcome of the proceeding in question and have participated actively in that proceeding. The Commission considers that the following parties had a significant interest in the outcome of the proceeding and participated actively throughout the proceeding: Bell Canada; Bragg Communications Inc.; Cogeco Connexion Inc.; Quebecor Media Inc. on behalf of Videotron Ltd., Freedom Mobile Inc., and their brands Fizz and VMedia; Rogers Communications Canada Inc., including Shaw Telecom G.P. and Groupe Shaw Group (Rogers); Saskatchewan Telecommunications (SaskTel); TekSavvy Solutions Inc.; TELUS Communications Inc. (TELUS); and Xplore Inc.
13. The Commission considers that, consistent with its practice, it is appropriate to allocate the responsibility for payment of costs among costs respondents based on their telecommunications operating revenues (TORs) as an indicator of the relative size and interest of the parties involved in the proceeding.<sup>1</sup> However, as set out in Telecom Order 2015-160, the Commission considers \$1,000 to be the minimum amount that a costs respondent should be required to pay, due to the administrative burden that small costs awards impose on both the applicant and costs respondents.
14. Accordingly, the Commission finds that the responsibility for payment of costs should be allocated as follows:<sup>2</sup>

Company	Proportion	Amount
Rogers	54.09%	\$1,338.73
TELUS	45.91%	\$1,136.27

### Directions regarding costs

15. The Commission approves the application by the CDGM for costs with respect to its participation in the proceeding.
16. Pursuant to subsection 56(1) of the *Telecommunications Act*, the Commission fixes the costs to be paid to the CDGM at \$2,475.
17. The Commission directs that the award of costs to the CDGM be paid forthwith by Rogers and TELUS according to the proportions set out in paragraph 14.

Secretary General

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<sup>1</sup> TORs consist of Canadian telecommunications revenues from local and access, long distance, data, private line, Internet, and wireless services.

<sup>2</sup> In this order, the Commission has used the TORs of the costs respondents based on their most recent audited financial statements. However, the 2024 TORs are not readily available to the Commission, so the 2023 TORs were used.

## Related documents

- *Making it easier for consumers to shop for Internet services*, Telecom Notice of Consultation CRTC 2024-318, 4 December 2024, as amended by Telecom Notices of Consultation CRTC 2024-318-1, 14 February 2025, 2024-318-2, 28 February 2025, and 2024-318-3, 17 June 2025
- *Guidance for costs award applicants regarding representation of a group or a class of subscribers*, Telecom Information Bulletin CRTC 2016-188, 17 May 2016
- *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*, Telecom Order CRTC 2015-160, 23 April 2015
- *Revision of CRTC costs award practices and procedures*, Telecom Regulatory Policy CRTC 2010-963, 23 December 2010