



Telecom Order CRTC 2025-218

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Gatineau, 26 August 2025

File numbers: 1011-NOC2025-0020 and 4754-788

Determination of costs award with respect to the participation of the Canada Deaf Grassroots Movement in the proceeding initiated by Telecom Notice of Consultation 2025-20

Application

1. By letter dated 30 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 2025-20 (the proceeding). In the proceeding, the Commission sought comments on how to improve the routing of 9-8-8 calls and texts.
2. The Commission did not receive any interventions in response to the application for costs.
3. 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.
4. In particular, the CDGM submitted that it represents the interests of Deaf, Deaf Indigenous, Hard of Hearing, and Deaf-Blind (DDIHHDB) Canadians. The CDGM also submitted that its contribution did not duplicate that of the other public interest parties because it is the only party that raised issues and provided evidence of the diversity of concerns of DDIHHDB persons.
5. With respect to the group or class of subscribers that the CDGM has submitted it represents, the CDGM explained that this group or class consists of an estimated 370,000 DDIHHDB Canadians across the country. With respect to the specific methods by which the CDGM has submitted that it represents this group or class, the CDGM explained that it works with public, private and non-profit sectors to remove old barriers and prevent new barriers faced by DDIHHDB Canadians.
6. The CDGM requested that the Commission fix its costs at \$4,400, consisting entirely of external consultant fees. The CDGM filed a bill of costs with its application.
7. The CDGM claimed 33.5 hours for an external consultant at a rate of \$110 per hour to review the file, prepare the intervention and comments, prepare reply comments

and prepare the costs application, and 6.5 hours at a rate of \$110 per hour to review the file, prepare the intervention and comments, complete other preparation work and prepare the costs application.

8. The CDGM submitted that the telecommunications service providers who participated in the proceeding are the appropriate parties to be required to pay any costs awarded by the Commission (the costs respondents).

Commission's analysis

9. 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.
10. 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 represented the interests of an estimated 370,000 DDIHHDB Canadians.
11. The CDGM has also satisfied the remaining criteria through its participation in the proceeding. The CDGM provided substantial comments regarding how improvements to the routing of 9-8-8 suicide crisis calls and texts can ensure equitable access for DDIHHDB individuals in Canada. The CDGM emphasized the importance of trauma-informed, culturally appropriate, and accessible communication support, particularly through routing methods that properly account for the unique communication needs of DDIHHDB individuals and their proximity to appropriate local services. Accordingly, the Commission finds that the applicant meets the criteria for an award of costs under section 68 of the Rules of Procedure.
12. The rates claimed in respect of consultant 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.

13. This is an appropriate case in which to fix the costs and dispense with taxation, in accordance with the streamlined procedure set out in Telecom Public Notice 2002-5.
14. 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 in the proceeding: Bell Canada, including Bell Mobility Inc.; Bragg Communications Inc., carrying on business as Eastlink; Quebecor Media Inc., on behalf of its affiliates Videotron Ltd. and Freedom Mobile Inc. and their brands Fizz and VMedia; Rogers Communications Canada Inc., including Shaw Cablesystems G.P. and Groupe Shaw Group (Rogers);¹ Saskatchewan Telecommunications; TBayTel; and TELUS Communications Inc. (TELUS).
15. 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.²
16. 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.
17. Accordingly, the Commission finds that the responsibility for payment of costs should be allocated as follows:³

Company	Proportion	Amount
Bell Canada	38.91%	\$1,712.04
Rogers	33.12%	\$1,457.28
TELUS	27.97%	\$1,230.68

¹ Since the 2023 telecommunications operating revenues (TORs) were reported, ownership transactions have changed the makeup of Rogers. As a result, Shaw Cablesystems G.P.'s TORs have been added to Rogers'.

² TORs consist of Canadian telecommunications revenues from local and access, long distance, data, private line, Internet, and wireless services.

³ In this order, the Commission has used the TORs of the costs respondents based on their most recent audited financial statements.

Directions regarding costs

18. The Commission approves the application by the CDGM for costs with respect to its participation in the proceeding.
19. Pursuant to subsection 56(1) of the *Telecommunications Act*, the Commission fixes the costs to be paid to the CDGM at \$4,400.
20. The Commission directs that the award of costs to the CDGM be paid forthwith by Bell Canada, Rogers Communications Canada Inc., and TELUS Communications Inc. according to the proportions set out in paragraph 17.

Secretary General

Related documents

- *Call for comments – Improving the routing of 9-8-8 calls and texts*, Telecom Notice of Consultation CRTC 2025-20, 27 January 2025, as amended by Telecom Notice of Consultation CRTC 2025-20-1, 7 March 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
- *New procedure for Telecom costs awards*, Telecom Public Notice CRTC 2002-5, 7 November 2002