



Telecom Order CRTC 2025-314

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Gatineau, 25 November 2025

File numbers: 8000-P114-202404929 and 4754-791

Determination of costs award with respect to the participation of the Public Interest Advocacy Centre in the proceeding initiated by the Province of British Columbia Ministry of Citizens' Services

Application

1. By letter dated 23 June 2025, the Public Interest Advocacy Centre (PIAC) applied for costs with respect to its participation in the proceeding initiated by the Province of British Columbia Ministry of Citizens' Services (the proceeding). In the proceeding, the Commission considered whether to disclose certain current and future Annual Facilities Survey data such as updates collected from Internet and wireless telecommunications service providers (TSPs).
2. The Commission did not receive any interventions in response to the application for costs.
3. PIAC 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. Specifically, PIAC submitted that it represents the interests of all Canadian consumers, including those living in underserved and/or rural areas, who would benefit from the disclosure of broadband infrastructure data on the available options and services in their area.
5. PIAC also submitted that it assisted the Commission in developing a better understanding of the matters that were considered in the proceeding by advocating for nation-wide disclosure of broadband service provider data for the benefit of all Canadians, highlighting that such data is much more available to consumers in other countries. Furthermore, PIAC submitted that it had participated in a responsible way by complying with the Commission's Rules of Procedure and by respecting deadlines and processes.
6. PIAC requested that the Commission fix its costs at \$835, consisting entirely of legal fees. PIAC filed a bill of costs with its application.

7. PIAC claimed one day for in-house counsel at a rate of \$600 per day for conducting legal research and preparing and drafting submissions. PIAC also claimed one day for an in-house articling student at a rate of \$235 per day to review the file and prepare interventions.
8. PIAC submitted that TSPs are the appropriate parties to be required to pay any costs awarded by the Commission (the costs respondents). PIAC added that the responsibility for payment of costs should be divided among the costs respondents on the basis of their gross revenues.

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, PIAC has demonstrated that it meets this requirement. PIAC represents the interests of all Canadian consumers, including consumers who live in underserved and/or rural areas that would benefit from the disclosure of broadband infrastructure data on the available options and services in their area.
11. PIAC also satisfied the remaining criteria through its participation in the proceeding. In particular, PIAC's submissions, especially its explanations regarding the benefit of nation-wide disclosure of broadband service provider data for consumers and its analysis of the confidentiality/disclosure regime set out in the *Telecommunications Act* (the Act) assisted the Commission in developing a better understanding of the matters that were being considered. Furthermore, PIAC participated in a responsible way.
12. The rates claimed in respect of legal 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 PIAC was necessarily and reasonably incurred and should be allowed.

13. 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;¹ Bragg Communications Inc., carrying on business as Eastlink; the Independent Telecommunications Providers Association; Quebecor Media Inc., on behalf of its affiliates Videotron Ltd. and Freedom Mobile Inc.; Rogers Communications Canada Inc., including Groupe Shaw Group and Shaw Telecom G.P.;² Saskatchewan Telecommunications; TELUS Communications Inc.; and Xplore Inc.
14. 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.³
15. Accordingly, the Commission finds that Bell Canada is the appropriate costs respondent to PIAC's application for costs.⁴

Directions regarding costs

16. The Commission approves the application by PIAC for costs with respect to its participation in the proceeding.
17. Pursuant to subsection 56(1) of the Act, the Commission fixes the costs to be paid to PIAC at \$835.
18. The Commission directs that the award of costs to PIAC be paid forthwith by Bell Canada.

Secretary General

¹ Bell Canada, on its own behalf and on behalf of its affiliates Bell Mobility Inc.; Group Maskatel Québec L.P.; NorthernTel, Limited Partnership; Northwestel Inc.; and Télébec, Société en commandite.

² The Commission notes that since the 2023 TORs were reported, ownership transactions have changed the makeup of Rogers. As a result, Shaw Group's and Shaw Telecom G.P.'s telecommunications operating revenues have been added to Rogers'.

³ TORs consist of Canadian telecommunications revenues from local and access, long distance, data, private line, Internet, and wireless services.

⁴ In this order, the Commission has used the TORs of the costs respondent based on its most recent audited financial statements.

Related documents

- *Guidance for costs award applicants regarding representation of a group or a class of subscribers*, Telecom Information Bulletin CRTC 2016-188, 17 May 2016
- *Revision of CRTC costs award practices and procedures*, Telecom Regulatory Policy CRTC 2010-963, 23 December 2010