



Telecom Order CRTC 2025-353

PDF version

Gatineau, 18 December 2025

File numbers: 1101-NOC2024-0294 and 4754-772

Determination of costs award with respect to the participation of the Deaf Wireless Canada Consultative Committee in the proceeding initiated by Telecom Notice of Consultation 2024-294

Application

1. By letter dated 12 April 2025,¹ the Deaf Wireless Canada Consultative Committee (DWCC) applied for costs with respect to its participation in the proceeding initiated by Telecom Notice of Consultation 2024-294 (the proceeding). In the proceeding, the Commission called for comments to determine how it can amend the Wireless Code and the Internet Code (the Consumer Protection Codes) to ensure that Canadians can modify or cancel their plans without fees acting as a barrier. The Commission also addressed the amendments to the *Telecommunications Act* (the Act) set out in *An Act to implement certain provisions of the budget tabled in Parliament on April 16, 2024*, which require the Commission to prohibit fees whose main purpose is to discourage subscribers from modifying or cancelling their plans.
2. The Commission did not receive any interventions in response to the application for costs.
3. The DWCC 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. With respect to the group or class of subscribers that the DWCC has submitted that it represents, the DWCC explained that this group or class is a particular, specific, and distinct group, namely Deaf, Deaf-Blind, and Hard of Hearing (DDBHH) Canadians experiencing barriers to accessibility in broadcasting and telecommunications. The DWCC claimed to have assisted the Commission in developing a better understanding of the matters considered in the proceeding by providing clear, comprehensive, and organized submissions, which included the opinions of subject matter experts, and conducting a nationwide survey that gathered insights on the lived experiences of DDBHH Canadians. The DWCC also submitted that it

¹ The DWCC submitted an amended letter on 27 June 2025 to include an additional disbursement.

participated in a responsible way because it actively filed submissions and presented documents that highlighted the lived experience of DDBHH consumers as they relate to barriers to switching plans.

5. The DWCC requested that the Commission fix its costs at \$33,394.12, consisting of \$30,170 for consultant and analyst fees and \$3,224.12 for disbursements. The DWCC filed a bill of costs with its application.
6. The DWCC claimed a total of 94 hours at a rate of \$225 per hour for a senior external consultant (\$21,150) and 73 hours at a rate of \$110 per hour for an external analyst (\$8,030) to prepare interventions, replies, evidence, costs applications, and other submissions towards the proceeding. The DWCC also claimed six hours for an external consultant at a rate of \$165 per hour (\$990) to translate submissions into French when required, \$565 for a Langue des signes québécoise (LSQ) translation, \$302.28 for French LSQ translation, and \$2,356.84 for an LSQ video translation.
7. The DWCC submitted that the telecommunications services providers (TSPs) that participated in the proceeding are the appropriate parties to be required to pay any costs awarded by the Commission (the costs respondents).
8. The DWCC suggested that the responsibility for payment of costs should be divided among the costs respondents on the basis of their telecommunications operating revenues (TORs).²

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.

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

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 DWCC has demonstrated that it meets this requirement because it represents the interests of a particular, specific, and distinct group, namely DDBHH Canadians who experience accessibility challenges in broadcasting and telecommunications in the form of barriers to switching plans with wireless phone or Internet service providers. This group has an interest in the outcome of the proceeding because they could be affected by it.
11. The DWCC has also satisfied the remaining criteria through its participation in the proceeding. In particular, the DWCC's submissions, such as a survey report with infographics that capture and visually summarize key points regarding DDBHH Canadians' current experiences with barriers like activation charges, unexpected costs, and provider-switching fees, assisted the Commission in developing a better understanding of the matters that were considered. The DWCC also assisted the Commission by providing its unique point of view and participating in a responsible way as it actively filed submissions and presented documents that highlighted the experiences of DDBHH consumers with switching plans.
12. The rates claimed in respect of consultant and analyst fees are in accordance with the rates established in the *Guidelines for the Assessment of Costs* (the Guidelines), as set out in Telecom Regulatory Policy 2010-963. The Commission finds that the total amount claimed by the DWCC 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;³ Bragg Communications Inc., carrying on business as Eastlink; Bravo Telecom; Cogeco Communications Inc., on behalf of its subsidiary Cogeco Connexion Inc.; Iristel Inc.; Quebecor Media Inc., on behalf of its affiliates Videotron Ltd. and Freedom Mobile Inc. and their brands Fizz and VMedia (Quebecor); Rogers Communications Canada Inc., including Groupe Shaw Group and Shaw Telecom G.P. (Rogers); Saskatchewan Telecommunications; SSi Micro Ltd., carrying on

³ Bell Canada, on its own behalf and on behalf of the following companies or related divisions and brands: Bell Aliant Regional Communications, Limited Partnership; Bell Internet Companies Group (including B2B2C Inc.; Distributel Communications Limited [including Primus Telecommunications Canada Inc. and Acanac Inc.]; EBOX, a division of Bell Canada; and Oricom Internet Inc.); Bell Mobility Inc.; Bell MTS Inc.; Câblevision du Nord de Québec inc.; DMTS, a division of Bell Canada; Groupe Maskatel Québec LP; KMTS, a division of Bell Canada; Lucky Mobile; NorthernTel, Limited Partnership (including NorthernTel FibreOp); Northwestel Inc.; Ontera, a division of Bell Canada; Télébec, Société en commandite; and Virgin Plus.

business as SSi Canada; TekSavvy Solutions Inc.; TELUS Communications Inc. (TELUS); 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 TORs as an indicator of the relative size and interest of the parties involved in the proceeding.
15. 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.
16. Accordingly, the Commission finds that the responsibility for payment of costs should be allocated as follows:⁴

Company	Proportion	Amount
Bell Canada	36.63%	\$12,232.38
Rogers	30.08%	\$10,044.05
TELUS	25.53%	\$8,524.72
Quebecor	7.76%	\$2,592.97

Directions regarding costs

17. The Commission approves the application by the DWCC for costs with respect to its participation in the proceeding.
18. Pursuant to subsection 56(1) of the Act, the Commission fixes the costs to be paid to the DWCC at \$33,394.12.
19. The Commission directs that the award of costs to the DWCC be paid forthwith by Bell Canada, Rogers Communications Canada Inc., TELUS Communications Inc., and Quebecor Media Inc. according to the proportions set out in paragraph 16.

Secretary General

⁴ In this order, the Commission has used the TORs of the costs respondents based on their most recent audited financial statements. However, the TORs of 2024 were not readily available to the Commission when it made its determination, so 2023 TORs were used.

Related documents

- *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, as amended by Telecom Notices of Consultation CRTC 2024-294-1, 20 December 2024; 2024-294-2, 14 February 2025; and 2024-294-3, 28 February 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