



Telecom Decision CRTC 2026-72

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Reference: Part 1 application posted on 23 May 2025

Gatineau, 22 April 2026

Public record: 8665-D112-202502708

Deaf and Hard of Hearing Coalition – Application to review and vary Telecom Regulatory Policy 2025-54

Summary

Video relay service (VRS) is a telecommunications service that allows sign language users and voice telephone users to communicate through an interpreter. The Commission requires telecommunications service providers to fund VRS. In Telecom Regulatory Policy 2025-54, the Commission updated its VRS policy. Specifically, it ensured that the service is more inclusive and diverse and enhanced its usability.

In May 2025, the Newfoundland and Labrador Association of the Deaf and the Ontario Association of the Deaf, collectively, the Deaf and Hard of Hearing Coalition (DHH Coalition), requested that the Commission review and vary its updated VRS policy. The DHH Coalition argued that the Commission made errors in the policy, specifically, that it did not go far enough in making VRS equivalent to the telephone service available to hearing persons.

Based on the record of this proceeding, the Commission finds that the applicant has not established a substantial doubt as to the correctness of the updated VRS policy. As a result, the Commission declines to review and vary the updated VRS policy.

The Commission values the opinions and views of the DHH Coalition, other Deaf and Hard of Hearing advocacy organizations, and VRS users. It notes that their comments regarding VRS were instrumental to Telecom Regulatory Policy 2025-54. The Commission invites the DHH Coalition and all VRS users to continue sharing their feedback through the available channels, including through the [Canadian Administrator of VRS \(CAV\), Inc.'s \(CAV\) Outreach Team](#), the [CAV's Consumer Consultation Panel](#), and the members of the [CAV's Board of Directors](#).

Background

1. The Commission published Telecom Regulatory Policy 2025-54 in February 2025. In that regulatory policy, the Commission confirmed that video relay service (VRS) remains a basic telecommunications service that must be made available in Canada and funded by

telecommunications service providers. In addition, the Commission updated its VRS policy to, among other things:

- ensure the service is more inclusive and diverse and to enhance its usability;
- give the Canadian Administrator of VRS (CAV), Inc. (CAV) the flexibility and resources to enhance the service to meet the ever-evolving needs of its users and to make use of advances in technology; and
- ensure that the CAV continues to be transparent and accountable to the Commission and Canadians who rely on it.

Review and vary application

2. In May 2025, the Commission received an application from the Newfoundland and Labrador Association of the Deaf and the Ontario Association of the Deaf, collectively, the Deaf and Hard of Hearing Coalition (DHH Coalition) requesting that the Commission review and vary Telecom Regulatory Policy 2025-54.
3. The DHH Coalition submitted that, by maintaining minimum requirements and a funding cap on the CAV, Telecom Regulatory Policy 2025-54 limits the development and expansion of VRS, thus preventing it from being truly accessible and barrier-free. In their view, the policy prevents parity between VRS users and hearing individuals.
4. The DHH Coalition argued on this basis that the Commission is not meeting its legal obligations, including those set out in the 2023 Policy Direction,¹ the *Canadian Charter of Rights and Freedoms* (the Charter), the *Canadian Human Rights Act*, the United Nations' *Convention on the Rights of Persons with Disabilities* and the *Accessible Canada Act*.
5. In response to the application filed by the DHH Coalition, the Commission received interventions from the CAV, the Canada Deaf Grassroots Movement (CDGM), the Canadian Telecommunications Association (CTA), and Quebecor Media Inc. (Quebecor).

Review and vary criteria

6. Under section 62 of the *Telecommunications Act* (the Act), the Commission can review and, if necessary, vary its decisions.

¹ *Order Issuing a Direction to the CRTC on a Renewed Approach to Telecommunications Policy*, SOR/2023-23, 10 February 2023.

7. The Commission can use this authority, either on application or on its own motion, to revisit a past decision and make changes to correct any errors or oversights, or to reflect changed circumstances.
8. The Commission's framework for assessing review and vary applications is set out in Telecom Information Bulletin 2011-214. This is a well-established framework that contributes to regulatory certainty and predictability by allowing the Commission to revisit a past decision and make corrections for any errors, oversights, or changes in circumstances.
9. Based on the record before it, the Commission assesses whether there is substantial doubt as to the correctness of the decision. If there is a substantial doubt, the Commission can consider varying a decision.
10. The Commission will typically assess whether an applicant has established substantial doubt resulting from:
 - an error in law or in fact;
 - a fundamental change in circumstances or facts since the decision;
 - a failure to consider a basic principle which had been raised in the original proceeding; or
 - a new principle that has arisen as a result of the decision.

Issue

11. The issue to be addressed in this decision is whether there is a substantial doubt as to the correctness of the Commission's determinations in Telecom Regulatory Policy 2025-54.

Positions of parties

12. The CDGM supported the DHH Coalition's application, stating that the Commission has a legal obligation to provide functionally equivalent telephony for Deaf and hard of hearing (DHH) individuals. The CDGM also supported the DHH Coalition's assessment that the funding cap blocks innovation and the development of VRS.
13. The CAV, the CTA, and Quebecor each submitted that the Commission should deny the DHH Coalition's application since the applicant did not demonstrate that the Commission made an error in fact or law, or that there have been any fundamental changes in circumstances since Telecom Regulatory Policy 2025-54. They added that the applicant mainly expressed dissatisfaction or disappointment with outcomes of Telecom Regulatory Policy 2025-54 and repeated issues that were already addressed by the Commission in the original decision. The CTA also submitted that the DHH Coalition did not provide any new information or evidence in support of its views.

14. In response to the comments made by the CAV, the CTA, and Quebecor, the DHH Coalition expanded on its original submission by arguing that:

- the Commission failed to consider a basic principle by not mandating a truly DHH-friendly and accessible VRS, as required by its legal obligations to prevent and remove accessibility barriers; and
- the Commission made an error in fact in Telecom Regulatory Policy 2025-54 when it assumed that VRS is accessible when, according to the DHH Coalition, it is not.

15. In addition, the DHH Coalition maintained that removing the funding cap would increase the funding of the CAV and help guarantee that VRS users have access to a service that is equivalent to their hearing peers.

Commission's analysis

16. In Telecom Information Bulletin 2011-214, the Commission explains that it will generally only vary its decisions if the applicant has demonstrated a substantial doubt that they are correct.

17. Regarding the review and vary application, while the DHH Coalition expressed dissatisfaction with certain aspects of Telecom Regulatory Policy 2025-54 and reiterated many of the recommendations it made in the proceeding that led to the regulatory policy, it did not demonstrate an error, a fundamental change, a failure to consider a basic principle, or a new principle that would raise a substantial doubt as to the correctness of the decision.

18. With respect to the DHH Coalition's submission that the Commission failed to meet its legal obligations, Appendix 1 to Telecom Regulatory Policy 2025-54 describes in detail how the Commission considered the relevant legal framework to inform its decision. This includes the telecommunications policy objectives under the Act, the Charter's values and human rights principles, as well as the principles set out in the *Accessible Canada Act* and the 2023 Policy Direction.

19. The Commission must take into account the fundamental values of equality established in the Charter in its decision-making. In addition, the 2023 Policy Direction requires the Commission to consider how its decisions enhance and protect the rights of consumers, including those related to accessibility. The *Accessible Canada Act* also sets out accessibility principles (including that all persons are to have barrier-free access to full and equal participation in society) and is based on a model of progressively preventing and removing barriers.

20. The Commission has discretion in terms of how to implement and apply these values, principles, and policy objectives, as well as how to balance these with the objectives set out in the Act.

21. The Commission notes that Telecom Regulatory Policy 2025-54 was the result of an extensive public consultation that included the participation of DHH individuals and groups representing

members from DHH communities, including the DHH Coalition. Comments from these groups regarding VRS were instrumental to Telecom Regulatory Policy 2025-54. As such, Telecom Regulatory Policy 2025-54 puts forth a solution that the Commission considered the best way forward to prevent and remove barriers to accessibility in light of the record before it.

22. The Commission has already taken measures to help address the specific concerns raised by the DHH Coalition in its review and vary application. For instance, 9-1-1 calls are already treated on a priority basis, and the CAV is required to include 9-1-1 and 9-8-8 response times in its annual report, so that these can be monitored transparently and effectively. The Commission also required the CAV to consider interoperability with other jurisdictions' VRS systems to the extent possible to facilitate direct calls internationally.
23. The Commission also set out to update the requirements for VRS to ensure that it remains accessible for users, given the changes that have taken place since it was first launched. The CAV must now meet or exceed these updated requirements, and it will have a significantly increased funding cap to help it do so. Telecom Regulatory Policy 2025-54 raised the cap from \$30 to \$41 million.
24. The Commission encourages the DHH Coalition and all VRS users to continue to share their experiences and perspectives on VRS. The Commission is committed to facilitating ways in which people from DHH communities may provide feedback to the CAV and the Commission on VRS, outside the context of a review and vary application.
25. To that end, the Commission notes that there are many ways VRS users can provide feedback to the CAV. For example:
 - The CAV Outreach team holds several virtual and/or in-person events across Canada to connect with DHH communities.
 - The CAV holds biannual discussions with its Consumer Consultation Panel. Members of the panel include nominated representatives and American Sign Language (ASL) and langue des signes québécoise (LSQ) registered stakeholder groups.
 - The CAV has a customer service that provides telephone and live chat support to all VRS users across Canada, available five days a week.
 - The CAV Board of Directors has members who represent the ASL- and LSQ-using communities.
26. The DHH Coalition and other groups representing DHH communities are also encouraged to provide feedback to the Commission in any of the following ways:

By mail:

Canadian Radio-television and Telecommunications Commission

Gatineau, Quebec K1A 0N2
Canada

By telephone (toll-free) via VRS:
1-877-249-2782

By live chat via our website at crtc.gc.ca/eng/contact:
Service hours: Monday to Friday, 8:30 a.m. to 12 p.m. and 1 p.m. to 4:30 p.m. (Eastern time)

By email at infotelecom@crtc.gc.ca:
In your email, give a clear explanation of why you are writing, so we can direct you to the appropriate place.

27. In addition, the Commission encourages groups representing the DHH community to consult the ASL and LSQ videos available on the Commission’s website, including the videos entitled “[Your Roadmap to CRTC processes in ASL](#)” and “CRTC Guidelines for Review and Vary Applications – ASL.”

Conclusion

28. In light of all of the above, based on the record of this proceeding, the Commission finds that the applicant did not establish a substantial doubt as to the correctness of the original decision. The Commission therefore denies the DHH Coalition’s application to review and vary Telecom Regulatory Policy 2025-54.

Secretary General

Related documents

- *Review of video relay service*, Telecom Regulatory Policy CRTC 2025-54, 21 February 2025
- *Revised guidelines for review and vary applications*, Telecom Information Bulletin CRTC 2011-214, 25 March 2011