



Telecom Decision CRTC 2026-73

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Reference: Part 1 application posted on 23 May 2025

Gatineau, 22 April 2026

Public record: 8665-C423-202502723

Canada Deaf Grassroots Movement – 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 Canada Deaf Grassroots Movement (CDGM) requested that the Commission review and vary its updated VRS policy. The CDGM asked the Commission to revisit some of the determinations it made in the policy, grouped under six main categories: VRS reliability, competition in the VRS market, expanding VRS functionalities, accessibility for marginalized users, removal of the funding cap, and governance reform.

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 CDGM, 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 CDGM 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 Canada Deaf Grassroots Movement (CDGM) requesting that the Commission review and vary Telecom Regulatory Policy 2025-54.
3. The CDGM's application requested the Commission to revisit some of its determinations set out in Telecom Regulatory Policy 2025-54 related to the following areas:
 - VRS reliability – The CDGM claimed there are persistent reliability issues (e.g., ongoing outages, technical failures, interpreter shortage) undermining the accessibility of VRS.
 - Competition in the VRS market – The CDGM submitted that allowing multiple VRS providers would drive improvements, spur technological advancements, and result in more consistent, accessible services for VRS users.
 - Expanding VRS functionality – The CDGM submitted there is a need to include Video Remote Interpreting, integration with Next-Generation 9-1-1 services, and accessibility for crisis hotlines such as 9-8-8.
 - Accessibility for marginalized users – The CDGM submitted there is a need to improve accessibility for Deaf-Blind and Deaf Indigenous users.
 - Removal of the funding cap – The CDGM advocated for expanded financial resources to improve service infrastructure, interpreter availability, and outreach programs.
 - Governance reform – The CDGM advocated for a user-centric decision-making process with more engagement from VRS users, more transparency within the CAV, and increased communication of its governance actions and an enhanced representation from Deaf-Blind and Indigenous communities on the CAV's Board of Directors.

4. In response to the application filed by the CDGM, the Commission received interventions from the CAV, the Canadian Telecommunications Association (CTA), the Deaf and Hard of Hearing Coalition (DHH Coalition), and Quebecor Media Inc. (Quebecor).

Review and vary criteria

5. Under section 62 of the *Telecommunications Act* (the Act), the Commission can review and, if necessary, vary its decisions.
6. 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.
7. 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.
8. 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.
9. 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

10. 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

11. The DHH Coalition supported the CDGM's application to review and vary Telecom Regulatory Policy 2025-54 and urged the Commission to review its VRS policy to ensure a barrier-free,

accessible VRS that meets the everyday communication needs of DHH individuals equally and without limitations.

12. The CAV, the CTA, and Quebecor each submitted that the Commission should deny the CDGM'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 the outcomes of Telecom Regulatory Policy 2025-54 and repeated issues that were already addressed by the Commission in the original decision.
13. In response to the comments made by the CAV, the CTA, and Quebecor, the CDGM reiterated that its application outlined clear grounds to demonstrate a substantial doubt as to the correctness of the Commission's decision. In particular, the CDGM mentioned that its application outlined ongoing structural and systemic barriers and a failure to adhere to accessibility principles and obligations set out in the *Accessible Canada Act*, the *Canadian Charter of Rights and Freedoms* and the United Nations' *Convention on the Rights of Persons with Disabilities*.

Commission's analysis

14. 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.
15. Regarding the review and vary application, while the CDGM 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.
16. In its reply, the CDGM cited a failure by the Commission to uphold accessibility principles and legal obligations. The Commission notes that Appendix 1 to Telecom Regulatory Policy 2025-54 describes in detail how the Commission considered the applicable legal framework, including the *Canadian Charter of Rights and Freedoms* and the *Accessible Canada Act*.
17. 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 CDGM. Comments from these groups 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.
18. The Commission has already taken measures to help address the specific concerns raised by the CDGM 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.

19. 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.
20. The Commission encourages the CDGM 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 Commission and the CAV on VRS, outside the context of a review and vary application.
21. 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.
22. The CDGM 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/](https://www.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.

23. 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

24. 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 CDGM'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