



# **BCE Accessibility Progress Report 2025**

# BCE Accessibility Progress Report 2025

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## 1.0 General

This Accessibility Progress Report, which applies to BCE Inc. (BCE or Bell) as defined in the footnote below,<sup>1</sup> has been prepared in accordance with the requirements of the Accessible Canada Act (S.C. 2019, c. 10) and its regulations (ACA).

BCE has a process for receiving and responding to feedback, including feedback on how services are delivered to persons with disabilities.

Our Accessibility Plan, Progress Reports and a description of our accessibility feedback process are available in the following alternate formats: print, large print, braille, audio, electronic or other agreed-upon formats.

You can provide accessibility feedback or request an alternate format of our Accessibility Plan, Progress Reports and description of our feedback process in a number of ways, including by:

Completing an [online form](#)

Phone: 1 866 313-1092

TTY: 1 800 268-9242

Email: [accessible.feedback@bce.ca](mailto:accessible.feedback@bce.ca)

Regular mail: P. O. Box 8787 Downtown Station, Montréal, Québec H3C 4R5

Social Media Channels

For more information, visit [bce.ca/Accessibility](https://bce.ca/Accessibility)

The person responsible for receiving accessibility feedback at BCE is the Vice President, Experience Advisory and Operations Care.

Feedback can be provided anonymously.

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<sup>1</sup> BCE, along with the words "we", "us", "our" refer to the BCE group of companies and brands as they exist over time, as well as any successor companies as a result of corporate reorganizations or restructurings, to the extent that those companies and brands are subject to and not exempt from the requirements of the ACA (the entities referred together as "BCE"). Those companies and brands may include, but are not limited to: Acanac, Agincourt Productions Inc., Axia Fibrenet, Ballecourbe, BarDown, Bell Aliant, Bell Canada, Bell ExpressVu LP (Bell TV), Bell Media, Bell Media Radio Atlantique Inc., Bell Media Regional Radio Partnership, Bell Media Studios Inc., Bell Mobility, Bell Mobility Holdings Inc., Bell MTS, Bell Technical Solutions Inc., Bell Wholesale Services, Bell Wireless Alliance Services Inc., BCE Global, Bimcor Inc., BNN Bloomberg, CABLEVISION, Cablevision du Nord, canal-d, canal-investigation, canal-vie, CFTK TV, CJDC TV, CP24, Crave, CTVNEWS, CTV Specialty Sports Holding Inc., CTV Specialty Television Enterprises Inc., CTV Specialty Television Inc., Distributel Communications Limited, DMTS, EBOX Telecommunications Inc., ESPN Classic, Exploration Distribution Inc., Expertech, Exploration Production Inc., Feature Publishing Ltd., KMTS, Le Réseau des Sports (RDS) Inc., Les Éditions Musicales L.M.S. Limitée, Les Éditions Studio V Inc., Lucky Mobile, Maskatel, Navigata Communications Limited, NorthernTel, Northwestel Inc., noovo, noovo info, noovo moi, Ontera, ORBYT, Primus, RDS, RDS JEUX VIDEO, Solo Mobile, The Sports Network Inc., Télébec, ThinkTel, TotalTV Inc., TSN, Virgin Plus, VOX, VRAK, Xittel telecommunication and Z.

## 2.0 Executive Summary

BCE's dedication to advancing our accessibility capabilities has resulted in meaningful progress since we published our Accessibility Plan in April 2023 and our initial progress report in May 2024. Our ongoing consultations with persons with disabilities, coupled with valuable feedback from Bell team members, our advisory panel of internal and external stakeholders, and the public have been instrumental in shaping our efforts towards becoming a more accessible organization.

Our feedback process also enables us to conduct regular reviews of our progress and prioritize actions to address identified barriers to accessibility.

Some of the most significant progress made since publishing our Accessibility Plan includes the following:

- BCE team members are embracing our comprehensive mandatory training and education program, which is designed to raise awareness and create a deeper understanding of accessibility across the company.
- Enhanced annual accessibility training for thousands of customer service agents, supporting significant service level improvements for persons with disabilities. This training is separate from the mandatory training outlined above. It educates customer service agents on best practices for managing accessibility related inquiries and updating customers about the support available through our Accessibility Services Centre.
- Developed a plan to improve recruitment and equitable employment practices and processes, leveraging insights from our employee stakeholders group.
- Enhanced our frequently accessed customer-facing digital applications and our software development lifecycle process, making online experiences more accessible and inclusive.
- Received the 2024 REmmy Award for leadership in accessibility for workspace renovations at our Creekbank campus in Mississauga. This award recognizes Bell Canada's ongoing commitment to exceed building code requirements for accessibility when renovating our office buildings.
- Significantly enhanced our TV services to make them more accessible, including improving WCAG 2.1 level AA conformance and introducing or enhancing features such as voice command, screen reader compatibilities and described video on select devices.
- Updated document templates and guidelines to improve accessibility of communications materials and documents.

- Partnered with Canadian Hearing Services for our on-demand, virtual sign language interpreter program in corporate stores.

BCE remains committed to treating all people in a way that allows them to maintain their dignity and independence through a proactive and evolving approach. This Progress Report highlights our efforts to foster inclusivity and fulfill our purpose to advance how Canadians connect with each other and the world.

### 3.0 Status of Progress in Key Areas

This Progress Report aligns with the key areas outlined in our Accessibility Plan and provides an update on the actions we have taken thus far to advance accessibility. It also includes additional learnings and challenges identified that we aim to address over time as part of our long-term and ongoing efforts.

To ensure a balanced and focused approach across each key area, responsibilities to prioritize, action and address accessibility barriers are spread across various operational teams. Their efforts are guided by our cross-functional Accessibility Executive Steering Committee to ensure we are meeting targets in a timely manner.

This approach also provides more flexibility to consult persons with accessibility needs for direct feedback on how we can improve in each key area. Consultation groups include our employee stakeholders group, our customers and others who can provide insights into the accessibility experiences they have had with many different organizations, including Bell.

#### Employment

Following our initial progress report, we've continued to strengthen our commitment to fostering an inclusive and accessible workplace. In addition to an active awareness program for team members, the company also actively engages with team members who are impacted by disabilities and support awareness, education and advocacy. This direct feedback is helping us make informed progressive improvements on our accessibility initiatives, ensuring our approach remains responsive and effective in creating a truly supportive and inclusive environment for all.

Key Achievements and Progress:

- **Accessibility Training:** As of March 31, 2025, 91% of Bell Canada team members have completed our enhanced accessibility training. This has helped increase understanding, empathy and the usage of accessibility best practices in meetings and communications. We also began introducing this same training to other BCE companies late in 2024.
- **Employee Events:** Significantly increased team member participation in human resources-led initiatives such as Red T-Shirt Day, National Disability Employment

Awareness Month, Global Accessibility Awareness Day, and International Day of People with Disabilities.

- **Diversability at Bell Employee Resource Group (ERG):** Since its introduction in 2022, the Diversability at Bell ERG has grown by 60%, reflecting heightened interest in accessibility and inclusion across the company. Our members volunteer at company events throughout the year, raising awareness for accessibility across Bell.
- **Talent Acquisition:** Our talent acquisition teams have been trained on inclusive recruitment practices and provided with educational resources to help hiring managers foster inclusive experiences. The training and resources emphasize accommodation and accessibility needs and is designed to proactively support candidates from the very beginning of the recruitment process.
- **Streamlined Accommodation Processes:** Developed and delivered three training sessions on accessibility and accommodation procedures for people leaders and human resources team members. The training is supported by informed policies, improved processes and additional resources that include a checklist and inclusive interview questions.
- **Improved Feedback Mechanisms:** Formal mechanisms are in place, enhancing our process for gathering feedback from team members and persons with disabilities. This feedback is key to making ongoing improvements to our internal practices and for developing new resources.

This multifaceted approach demonstrates our continued commitment to creating a truly accessible and inclusive workplace.

## The Built Environment

Our commitment to fostering inclusive and barrier-free built environments in our offices, buildings and retail spaces remains a top priority. We continue to improve accessibility during renovations and new construction, proactively addressing barriers through clear communication and close collaboration with Bell Canada team members and external partners.

Key Achievements and Progress:

- **Significant Workspace Transformations:** We were proud to receive the 2024 REmmy Award for leadership in accessibility for workspace renovations at our Creekbank campus in Mississauga. Since 2022, we have renovated more than 1 million square feet of office space across Canada, addressing identified barriers to accessibility for nearly 14,000 Bell Canada team members. As part of

this process, diversity and accessibility groups visited a newly renovated office space and provided valuable insights and feedback for future projects.

- **Retail Space:** Since our Accessibility Plan was published in 2023, we have enhanced accessibility while renovating 66 retail locations. We have also engaged the Rick Hansen Foundation (RHF) to conduct comprehensive accessibility assessments of select retail stores and kiosks. These assessments, chosen based on a variety of designs and locations, achieved certification scores exceeding national building code requirements. These assessments identified several improvement opportunities that we plan to implement over the next three years. This experience also gave us valuable insights for future store designs and renovations by broadening our understanding of other accessibility factors such as the journey to get to the store, materials and finish impacts.
- **Universal Design Principles:** We continue to adopt universal design principles in new builds and actively incorporate accessibility improvements in office and retail renovations. Examples include adjustable lighting, counters and desks, noise-reducing materials, adequate circulation and aisle widths in stores, universal washrooms with hands-free fixtures, quiet spaces, and enhanced colour contrast and textural elements.
- **Improved Processes and Procedures:** We are revising store manuals and operating procedures to emphasize the importance of barrier-free pathways and accessible service counters. Accessibility checklists are also being developed to support regular inspections with retail store representatives.

Moving forward, we remain committed to ensuring accessibility is integral to all planned retrofits for our office buildings and retail stores. We are also developing and integrating wayfinding and signage standards into our building renovation plans and are in the process of implementing quiet zones and wellness rooms in many of our office areas.

## Information and Communication Technologies (ICT)

BCE is dedicated to leveraging technology advancements to achieve the highest standards of accessibility for our customers and team members. Our commitment involves identifying and removing barriers in our websites, mobile applications, computer systems, products and services. We continuously assess and monitor our digital offerings and actively solicit feedback from Canadians with diverse accessibility needs through a specialized third-party organization. This feedback directly informs our operational teams and supports their efforts to develop solutions that address accessibility challenges in information and communication technologies (ICT).

Key Achievements and Progress:

- **Significant Remediation and Process Improvements:** We have exceeded targets, making remediation updates to 227 customer-facing websites and

applications and more than 300 documents. Our strengthened operational processes include continuous monitoring and reporting of remediated assets and establishing a robust process for ongoing maintenance and improvement.

- **Enhanced Accessibility Across Platforms:** We've continued to significantly enhance the accessibility of our TV services on the web, mobile and connected TV devices. This includes ensuring we have closed captioning, screen reader and described video (DV) capabilities across most applications.
- **Expanded Training and Support:** We've continued to invest in education, training, job aids and support materials related to digital accessibility across BCE. This includes providing team members with the tools and resources they need to meet ICT accessibility guidelines.
- **Proactive Accessibility Integration:** We've proactively integrated accessibility considerations into all new technology projects from the outset. We also encourage accessibility adherence during each step in the development process.
- **Automated Accessibility Testing:** We are actively integrating automated accessibility scans into our software development lifecycle (SDLC). This helps to identify and address accessibility issues before code reaches production, improving efficiency and ensuring higher quality accessibility.
- **Ongoing Assessment and Improvement:** We continued to partner with a world-class leader in digital accessibility to conduct accessibility testing and research. This ensures ongoing improvement and alignment with best practices. We've also continued to remediate external and internal documents for accessibility and updated our brand guidelines to promote clear, concise and simple language in all communications.
- **Established Accessibility Framework:** We have established and implemented robust digital accessibility guidelines, policies and practices for self-serve web and mobile applications. This ensures a consistent and streamlined approach to digital product development and includes ongoing collaboration with content providers to improve systems and increase the availability of described video content.

Going forward, we will continue to address digital barriers across our employee-facing applications and incorporate universal design principles and best practices into our online platforms. Through our operational program, we continue to monitor our digital assets for accessibility concerns.

We will also actively monitor evolving ICT standards and plan to update our digital accessibility policies and directives.



## Communication, other than ICT

We have taken steps to address communication-related barriers experienced by our customers and our Bell team members. These include aligning our guidelines to improve document accessibility and applying these criteria when developing promotional and communication materials for our products and services.

Key Achievements and Progress:

- **Accessible Documents:** Continued to make more existing documents accessible for the public and Bell team members. We also maintain our commitment to make these documents available in alternate formats upon request.
- **Clearer Guidelines:** Our communications guidelines were further refined to include more comprehensive accessibility tips for creating simple, concise and easy-to-understand content.
- **Document Templates:** Bell's suite of accessible document templates was expanded with updated best practices, covering a wider range of communication needs.
- **Accessible Document Requests:** Strengthened our vendor partnership, making it quicker and easier for Bell Canada team members to request accessible documents in various alternate formats.
- **Increased Awareness:** Made promotional materials more comprehensive to better highlight accessibility options in our products and services. We also increased visibility of our detailed instructions on when to use and how to request communications in alternate formats.
- **Training:** Developed and rolled out online training that helps Bell Canada team members create their own accessible documents.

Going forward, we will continue to seek opportunities to further integrate accessibility into our practices and raise awareness with team members about the options available for making existing and new communications more accessible.

## The Procurement of Goods, Services and Facilities

We remain committed to promoting supplier inclusivity and addressing accessibility barriers. While we understand that fostering accessibility and inclusivity in procurement processes is evolving and ongoing, we continue to communicate the importance of accessibility to our suppliers.

Key Achievements and Progress:

- **Accessible Policies:** Following up on our 2023 assessment, we continue to ensure accessibility in working relationships with suppliers and vendors through ongoing contract reviews and further strengthening of our procurement policies, processes and tools.
- **Awareness:** We expanded procurement accessibility training beyond the initial information sessions in 2023, reinforcing policy standards and key obligations with more Bell team members who support our procurement process.
- **Tracking Adherence:** Enhanced our internal contracting tool to systematically track accessibility requirements throughout the lifecycle of our contracts for more consistent adherence.
- **Contracts:** Continued to collaborate with partners, manufacturers and vendors to enhance accessibility, further updating accessibility commitments in all future contracts and most existing agreements.

Going forward, we will continue our focus on integrating accessibility practices into our vendor and partner agreements.

## The Design and Delivery of Programs and Services

Improving access to our systems and networks while enhancing the customer experience remains central to our ongoing efforts to better understand and remove barriers experienced by persons with disabilities.

Key Achievements and Progress:

- **Agent Training:** Updated our annual accessibility training for customer service representatives to continue driving awareness on accessibility-related inquiries and the Accessibility Services Centre, which is a dedicated call centre supporting eligible customers with accessibility needs. All Bell Canada customer service agents completed this training in 2024.
- **Improved Service Levels:** Improved our Accessibility Service Centre service level to 94% for customers with disabilities. This was achieved by adding agents to our Accessibility Services Centre and improving visibility of accessibility offers on Bell.ca, VirginPlus.ca and LuckyMobile.ca.
- **Privacy a Priority:** Introduced clearer instructions, privacy and consent statements with links to relevant privacy policies.
- **Better E-chat Experience:** Further enhanced and expanded the use of our virtual chat assistant with natural language understanding, making it even easier for online users to provide feedback on accessibility, request material in alternate formats and access support resources.

- **Feedback Monitoring:** Continued to thoroughly monitor our feedback process to acknowledge all requests in a timely manner, while proactively collaborating with key stakeholders to optimize our processes, products and services.
- **Virtual Sign Language Interpretation:** Partnered with Canadian Hearing Services for our on-demand, virtual sign language interpreter program in corporate stores.

Going forward, we will continue to review and monitor the development of Accessibility Canada Standards, specifically in design and delivery of accessible programs and services. Through this process, we will also look for new ways to improve our systems and processes.

## Transportation

Transportation does not currently apply to BCE's operations.

## 4.0 Consultations

Since the development and publication of our Accessibility Plan and initial Progress Report, we have continued to learn a great deal about each of our key priority areas by consulting directly with persons with disabilities. These consultations have helped us identify and understand the impact of barriers experienced by persons with disabilities. Our consultation activities included:

- Ongoing engagement with our Advisory Panel and employee stakeholders group for feedback and suggestions about how we can improve accessibility in our recruitment and accommodation processes, employment opportunities, products and services and more. They also provided valuable feedback on our Accessibility Plan and Progress Reports.
- Held numerous virtual consultation sessions and interviews with persons with disabilities across Canada, supported by a leading vendor in the field of accessibility. This includes direct feedback on our products and services, customer service options, digital communications channels, built environments, employment and hiring practices, and general feedback. All feedback is shared directly with the operations teams responsible for the key areas of our Accessibility Plan and Progress Report.
- Participation in the Canadian Telecommunications Association virtual wireless accessibility consultation sessions, which included persons with disabilities and organizations and advocates working within the disability community.

BCE is proud of our ongoing progress to improve accessibility for persons with disabilities and we recognize that there will be more opportunities to improve in key areas as we continue to integrate new leading-edge technologies.

As leading technologies mature, our accessibility features will continue to advance.

## **5.0 Feedback**

We appreciate the feedback we have received, which continues to be submitted through various established channels with most feedback being shared over the phone or through our web form, which allows for anonymous input. We continue to acknowledge the receipt of all feedback, except for feedback submitted anonymously, through the same medium in which it was received.

In 2024, we received and acted upon valuable feedback in several key areas. This includes:

- Further enhancing screen reader capabilities for media applications and increasing availability for closed captioning and descriptive video.
- Continuing to improve customer service agent knowledge of accessibility products and services.
- Making our website and mobile application navigation more accessible.
- Improving the onboarding process for new customers with accessibility needs.
- Finding more opportunities to accommodate team members in the workplace.

The feedback we receive is instrumental in supporting our continued efforts to identify, remove and prevent barriers to accessibility, prioritize and develop solutions, and further our ongoing work to reduce and remove barriers. Incorporating feedback from persons with disabilities is central to our commitment to inclusivity, which ensures our approach to supporting accessibility remains dynamic and responsive to the evolving needs of our diverse community.

## **6.0 Regulatory Conditions**

As required by section 42(1) and section 51(1) of the ACA, we have set out the following applicable conditions and provisions:

### **Licence Conditions under Part II of the Broadcasting Act**

Licence conditions that relate to the identification and removal of barriers and the prevention of new barriers are set out in Appendix A.

### **Provisions of any Order made under subsection 9(4) of the Broadcasting Act**

Provisions of any order that relate to the identification and removal of barriers and the prevention of new barriers are set out in Appendix A.

## **Provisions of any Regulations made under subsection 10(1) of the Broadcasting Act**

Provisions of any regulations that relate to the identification and removal of barriers and the prevention of new barriers are set out in Appendix A.

## **Conditions under section 24 or 24.1 of the Telecommunications Act**

Conditions that relate to the identification and removal of barriers and the prevention of new barriers are set out in Appendix B.

## **Provisions of any Regulations made under the Telecommunications Act**

Provisions of any regulations that relate to the identification and removal of barriers and the prevention of new barriers are set out in Appendix B.

## **7.0 Conclusion**

We are proud to report that we are continuing to make meaningful progress in our ongoing commitment to enhance accessibility in products, services, employment practices, built environment, information and communications technologies (ICT), procurement and communications other than ICT.

Our consultation efforts, feedback process, new partnerships and dedicated Bell team members have helped us to identify and address barriers to accessibility. As we continue our work to reduce and eliminate accessibility barriers, we recognize the importance of maintaining a dynamic and responsive plan that evolves with the changing needs of our accessibility community.

Our next Accessibility Plan will be released on or before June 1, 2026.

## **8.0 Appendices**

### **Appendix A – Broadcasting Act Requirements**

As required by section 42(1) of the ACA, this Appendix sets out:

- 42(1)(b) - the conditions imposed by licence, issued under Part II of the Broadcasting Act, to which some or all BCE broadcasting undertakings are subject that relate to the identification and removal of barriers and the prevention of new barriers;
- 42(1)(c) - the provisions of any order made under subsection 9(4) of the Broadcasting Act that relate to the identification and removal of barriers and the prevention of new barriers and that apply to some or all BCE broadcasting undertakings; and
- 42(1)(d) - the provisions of any regulations made under subsection 10(1) of the Broadcasting Act that relate to the identification and removal of barriers and the

prevention of new barriers and that apply to some or all BCE broadcasting undertakings.

This Appendix does not include requirements that have not been in force for at least three months before the day on which the Progress Report must be published<sup>2</sup> or expectations/encouragements, which do not rise to the level of imposed conditions.

## **A. Accessibility Requirements – Broadcasting Distribution Undertakings (BDUs) and On-demand Services (OS)**

### **1. Distribution of Programming Services**

- In the small basic package, BDUs are required to distribute AMI-Audio and AMI-tv in Anglophone markets, as well as AMI-télé and Canal M in Francophone markets.<sup>3</sup> This applies to licensed BDUs as well as exempt BDUs with more than 2,000 subscribers.<sup>4</sup>

### **2. Closed Captioning (CC), Audio Description (AD) and Described Video (DV)**

- Pass-through of CC and DV: BDUs cannot alter the content or format of a programming service or delete a programming service in the course of its distribution.<sup>5</sup>
- Community Channels:
  - BDUs shall provide AD of all key elements of information programming and appropriate training to hosts/access producers.<sup>6</sup>
- OS Services:
  - BDUs must ensure that 100% of English and French programs in inventory are CC (except community access TV programming).<sup>7</sup>
  - BDUs must implement a monitoring system to ensure that the correct signal is captioned, captioning is included in the broadcast signal, and captioning reaches the distributor of that signal in original form.<sup>8</sup>

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<sup>2</sup> See the Accessible Canada Act (S.C. 2019, c. 10), section 42(6) with respect to Accessibility Plan. This approach adopted for Progress Report.

<sup>3</sup> Broadcasting Order CRTC 2018-320, Distribution of AMI-audio by licensed broadcasting distribution undertakings; Broadcasting Order CRTC 2018-321, Distribution of AMI-tv by licensed broadcasting distribution undertakings; Broadcasting Order CRTC 2018-322, Distribution of AMI-télé by licensed broadcasting distribution undertakings; Broadcasting Order CRTC 2018-308, Distribution of Canal M by licensed broadcasting distribution undertakings.

<sup>4</sup> Broadcasting Distribution Regulations (SOR/97-555), section 17(1)(g); and Broadcasting Regulatory Policy CRTC 2017-319; and Broadcasting Order CRTC 2017-320, Revised exemption order for terrestrial BDUs serving fewer than 20,000 subscribers, Appendix, paragraph 15.

<sup>5</sup> BDR (SOR/97-555), section 7; and BRP 2017-319 and BO 2017-320, Appendix, paragraph 11.

<sup>6</sup> Appendix 1 to Broadcasting Decision CRTC 2020-356, Various terrestrial broadcasting distribution undertakings – Licence renewals, COL 10 and 11.

<sup>7</sup> Appendix to BRP 2017-138, Standard requirements for on-demand services, COL 21.

<sup>8</sup> Ibid., COL 22.

- When providing CC, English- and French-language OS must meet quality standards about, among other things, lag time and accuracy.<sup>9</sup>

### **3. Equipment that Supports Accessibility**

- BDUs must provide equipment, software or other technology for customers with visual or fine motor skills disabilities to identify and have access to programming services.<sup>10</sup>
- BCE BDUs' Canadian Radio-television and Telecommunications Commission (CRTC) Annual Returns must include information on the following: availability of accessible set top boxes (STBs), remotes and accessibility features, penetration of accessible STBs and remotes, and number of accessibility-related queries received/resolved.<sup>11</sup>
- BCE BDUs must provide at least one simple means of accessing described programming (open or embedded) requiring little or no visual acuity.<sup>12</sup>

### **4. Customer Service Related**

- Promotion and Customer Service:
  - BCE BDUs shall promote disability-specific services/products in an accessible manner.<sup>13</sup>
  - BCE BDUs shall make their general call centres accessible to the point of providing a reasonable accommodation to persons with disabilities by training customer service representatives to handle calls from persons with disabilities and familiarizing them with products and services for persons with disabilities, and by making their Interactive Voice Response systems accessible.<sup>14</sup>
- Trial Period and Alternative Formats:
  - BDUs, as television service providers (TVSPs), must offer a 30-day trial period to a customer/member of a household who self-identifies as having a disability. If service/equipment does not meet the customer's needs for any reason, a customer must be able to cancel the service within the trial period without penalty, installation fees or early cancellation fees if they have returned any gift with purchase and any equipment provided (in near new condition).<sup>15</sup>

<sup>9</sup> Ibid., COL 23. Quality standards for French-language services are set out in BRP 2011-741-1, Quality standards for French-language closed-captioning – Enforcement, monitoring and the future mandate of the French-language CC Working Group. Quality standards for English-language services are set out in BRP 2019-308, English-language CC mandatory quality standards relating to the accuracy rate for live television programming.

<sup>10</sup> BDR (SOR/97-555), section 7.3.

<sup>11</sup> Appendix 1 to BD 2020-356, COL 9.

<sup>12</sup> Ibid., COL 12.

<sup>13</sup> Ibid., COL 13.

<sup>14</sup> Ibid., COL 18.

<sup>15</sup> Television Service Provider Code, Provision VIII: 1-3; also enforced by COL in BD 2020-356 and by the exemption order in BRP 2017-319 and BO 2017-320 for BCE exempt and affiliated BDUs, paragraph 27.

- BDUs, as TVSPs, must provide alternative formats of written agreements and the Critical Information Summary, upon request, at no charge, at any time.<sup>16</sup>
- Accessibility plans, progress reports, and descriptions of feedback processes published under the ACA must be made available, upon request, in print, large print, braille, audio format, electronic format that is compatible with adaptive technology that is intended to assist persons with disabilities, or any other format that the person and the regulated broadcasting entity agree upon and for which there is proof of the agreement.<sup>17</sup>

## **5. Website Accessibility**

- BCE BDUs must have an easy-to-find home page link to a section of their websites “dealing with the needs of persons with disabilities”.<sup>18</sup>
- BCE BDUs must make information on their websites accessible to the point of providing a reasonable accommodation for persons with disabilities.<sup>19</sup>
- Where customer service functions on their websites are not accessible, BCE BDUs must ensure that persons with disabilities will not incur a charge or otherwise be disadvantaged if they use an alternate avenue of customer service.<sup>20</sup>
- BCE BDUs shall make accessible any customer service functions that are available solely over their websites.<sup>21</sup>
- Accessibility plans, progress reports, and descriptions of feedback processes published under the ACA must be published in a way that meets W3C Web Content Accessibility Guidelines (WCAG) guidelines.<sup>22</sup>

## **B. Accessibility Requirements – Programming Undertakings**

### **1. Offering CC**

- Television Stations (TS) requirements:
  - TS must caption 100% of English- and French-language programs broadcast over the broadcast day.<sup>23</sup>

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<sup>16</sup> Ibid., Provision VII: 3 and IX: 4d 3; also enforced by COL in BD 2020-356 and by the exemption order in BRP 2017-319 and BO 2017-320 for BCE exempt and affiliated BDUs, paragraph 27.

<sup>17</sup> Canadian Radio-television and Telecommunications Commission Accessibility Reporting Regulations (SOR/2021-160), sections 8, 11, and 15.

<sup>18</sup> Appendix 1 to BD 2020-356, COL 14.

<sup>19</sup> Ibid., COL 15; Examples of what the CRTC consider to be reasonable accommodations are listed in paragraph 66 of Broadcasting and Telecom Regulatory Policy CRTC 2009-430, Accessibility of telecommunications and broadcasting services.

<sup>20</sup> Ibid., COL 16.

<sup>21</sup> Ibid., COL 17.

<sup>22</sup> CRTC Accessibility Reporting Regulations (SOR/2021-160), sections 4, 10, and 14.

<sup>23</sup> Appendix 1 to Broadcasting Regulatory Policy CRTC 2016-436, Standard requirements for television stations, discretionary services, and on-demand services, COL 9.



- TS must ensure that advertising, sponsorship messages and promos in English and French languages are closed captioned.<sup>24</sup>
- TS must implement a monitoring system to ensure that, for any signal that is closed captioned, the correct signal is captioned, the captioning is included in its broadcast signal, and this captioning reaches the distributor of that signal, in its original form.<sup>25</sup>
- When providing CC, English- and French-language TS must meet quality standards about, among other things, lag time and accuracy.<sup>26</sup>
- Discretionary Services (DS) requirements:
  - DS must caption 100% of English- and French-language programs broadcast over the broadcast day.<sup>27</sup>
  - A DS operating in its first licence term shall ensure that advertising, sponsorship messages and promos in the English and French languages are closed captioned by no later than the fourth year of the licence term. For a DS operating in its second or subsequent licence term, it shall ensure that advertising, sponsorship messages and promos in the English and French languages are closed captioned.<sup>28</sup>
  - DS should implement a monitoring system to ensure that, for any signal that is closed captioned, the correct signal is captioned, the captioning is included in its broadcast signal, and this captioning reaches the distributor of that signal, in its original form.<sup>29</sup>
  - When providing CC, English- and French-language DS must meet quality standards about, among other things, lag time and accuracy.<sup>30</sup>
- OS requirements:
  - OS must caption 100% of English- and French-language programs in its inventory.<sup>31</sup>
  - OS should implement a monitoring system to ensure that, for any signal that is closed captioned, the correct signal is captioned, the captioning is included in its broadcast signal, and this captioning reaches the distributor of that signal, in its original form.<sup>32</sup>

<sup>24</sup> Ibid., COL 10; and BTRP 2009-430.

<sup>25</sup> Ibid.

<sup>26</sup> Appendix 1 to BRP 2016-436, Standard conditions of licence, expectations and encouragements for television stations, COL 11 a) b); Quality standards to be met are set out in BRP 2011-741-1 (French-language services) and in BRP 2019-308 (English-language services).

<sup>27</sup> Appendix 1 to BRP 2023-306, Standard conditions of service, expectations and encouragements for discretionary services, COL 11.

<sup>28</sup> Appendix 1 to BRP 2023-306, COL 12; and BTRP 2009-430.

<sup>29</sup> Appendix 1 to BRP 2023-306, COL 13.

<sup>30</sup> Ibid., COL 14; Quality standards to be met are set out in BRP 2011-741-1 (French-language services) and in BRP 2019-308 (English-language services).

<sup>31</sup> Appendix 3 to BRP 2016-436, Standard conditions of licence, expectations and encouragements for on-demand services, COL 21.

<sup>32</sup> Appendix 3 to BRP 2016-436, COL 22; and BTRP 2009-430.

- When providing CC, English- and French-language OS must meet quality standards about, among other things, lag time and accuracy.<sup>33</sup>
- Mainstream Sports Services (MSS):
  - MSS shall caption 100% of programs over the broadcast day.<sup>34</sup>
  - When providing CC, MSS shall adhere to quality standards about, among other things, lag time and accuracy.<sup>35</sup>
  - MSS must implement a monitoring system to ensure that, for any signal that is closed captioned, the correct signal is captioned, the captioning is included in its broadcast signal and this captioning reaches the distributor of that signal in its original form.<sup>36</sup>
- National News Services (NNS):
  - NNS shall caption 100% of its programs over the broadcast day.<sup>37</sup>
  - When providing CC, NNS shall adhere to quality standards about, among other things, lag time and accuracy.<sup>38</sup>
  - NSS shall ensure that advertising, sponsorship messages and promos in the English and French languages are closed captioned.<sup>39</sup>
  - NSS shall implement a monitoring system to ensure that, for any signal that is closed captioned, the correct signal is captioned, the captioning is included in its broadcast signal and this captioning reaches the distributor of that signal in its original form.<sup>40</sup>

## 2. Offering AD

- “Audio Description” or “AD” refers to announcers reading aloud the textual and graphic information that is displayed on the screen during information programs.
- TS and DS shall provide AD for all the key elements of Canadian information programs, including news programming.<sup>41</sup>
- MSS shall provide AD for all the key elements of information programs, including news programming.<sup>42</sup>

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<sup>33</sup> Appendix 3 to BRP 2016-436, COL 23; Quality standards to be met are set out in BRP 2011-741-1 (French-language services) and in BRP 2019-308 (English-language services).

<sup>34</sup> Appendix 3 to Broadcasting Regulatory Policy CRTC 2023-306, Conditions of service, expectations and encouragement for mainstream sports discretionary services, COL 6.

<sup>35</sup> Ibid., COL 7; and BTRP 2009-430; Quality standards to be met are set out in BRP 2011-741-1 (French-language services) and in BRP 2019-308 (English-language services).

<sup>36</sup> Appendix 3 to BRP 2023-306, COL 7; and BTRP 2009-430.

<sup>37</sup> Appendix 2 to BRP 2023-306, COL 7.

<sup>38</sup> Ibid., COL 8; Quality standards to be met are set out in BRP 2011-741-1 (French-language services) and in BRP 2019-308 (English-language services).

<sup>39</sup> Appendix 2 to BRP 2023-306, COL 9; and BTRP 2009-430.

<sup>40</sup> Appendix 2 to BRP 2023-306.

<sup>41</sup> Appendix 1 to BRP 2016-436, COL 13; and Appendix 1 to BRP 2023-306, COL 16.

<sup>42</sup> Appendix 3 to BRP 2023-306, COL 8.

- NNS shall provide AD for all the key elements of information programs, including news programming.<sup>43</sup>

### 3. Offering DV

- Television Stations:
  - BCE television stations shall provide DV for all English- and French-language programming that is broadcast during prime time (i.e., from 7 p.m. to 11 p.m.) and that is drawn from specific program categories<sup>44</sup>, with the exception of U.S. programming received without described video less than 24 hours prior to air. Such programs will be broadcast with described video for any repeat airings scheduled greater than 24 hours from delivery. In such cases, a logo is to be displayed at the start of the first airing and an audio notification is to be provided indicating that repeat broadcasts will be aired with full DV at a future time.<sup>45</sup>
- Discretionary Services:
  - BCE discretionary services shall provide DV for all English- and French-language programming that is broadcast during prime time (i.e., from 7 p.m. to 11 p.m.) and that is drawn from specific program categories<sup>46</sup> with the exception of U.S. programming received without described video less than 24 hours prior to air. Such programs will be broadcast with described video for any repeat airings scheduled greater than 24 hours from delivery. In such cases, a logo is to be displayed at the start of the first airing and an audio notification is to be provided indicating that repeat broadcasts will be aired with full DV at a future time.<sup>47</sup>

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<sup>43</sup> Appendix 2 to BRP 2023-306, COL 10.

<sup>44</sup> This requirement applies to the following program categories set out in Item 6 of Schedule 1 to the Television Broadcasting Regulations, 1987, as amended from time to time: 2(b) Long-form documentary, 7 Drama and comedy, 9 Variety, 11(a) General entertainment and human interest and 11(b) Reality television, and/or is programming targeting preschool children (0-5 years of age) and children (6-12 years of age).

<sup>45</sup> Appendix 3 to Broadcasting Decision CRTC 2017-149, Bell Media Inc. – Licence renewals for English-language television stations and services, COL 1; and Broadcasting Regulatory Policy CRTC 2019-392, Amendment proposed by Bell Media Inc., Corus Entertainment Inc. and Rogers Media Inc. to their condition of licence that requires prime time programming to be broadcast with described video, paragraph 40.

<sup>46</sup> This requirement applies to the following program categories set out in Item 6 of Schedule 1 to the Discretionary Services Regulations: 2(b) Long-form documentary, 7 Drama and comedy, 9 Variety, 11(a) General entertainment and human interest and 11(b) Reality television, and/or is programming targeting preschool children (0-5 years of age) and children (6-12 years of age).

<sup>47</sup> Appendix 4 to BD 2017-149, COL 1; and BRP 2019-392, paragraphs 40 and 41.

- National News Services:
  - NNS subject to DV requirements prior to renewal or that belong to a vertically integrated entity shall provide DV for programming broadcast between 7 p.m. and 11 p.m., seven days a week, drawn from specific program categories.<sup>48 49</sup>

#### **4. Filing reports with the CRTC**

- For French-language services, every two years broadcasters must provide the CRTC with a report describing their efforts made in-house and requests to captioning providers in order to improve the accuracy rate.<sup>50</sup>
- For English-language services, every year, broadcasters must provide the Commission with a report describing their efforts made in-house and requests to caption providers to improve the English-language CC accuracy rate for live television programming during the broadcast year.<sup>51</sup>
- Bell Media must file the Described Video Working Group Report every six months.<sup>52</sup>

#### **5. Alternative Formats and Website Accessibility**

- Accessibility plans, progress reports, and descriptions of feedback processes published under the ACA must be made available, upon request, in print, large print, braille, audio format, electronic format that is compatible with adaptive technology that is intended to assist persons with disabilities, or any other format that the person and the regulated broadcasting entity agree upon and for which there is proof of the agreement.<sup>53</sup>
- Accessibility plans, progress reports, and descriptions of feedback processes published under the ACA must be published in a way that meets WCAG guidelines.<sup>54</sup>

### **Appendix B – Telecommunications Act Requirements**

As required by section 51(1) of the ACA, this Appendix sets out:

- 51(1)(b) - the conditions imposed under section 24 or 24.1 of the Telecommunications Act to which some or all of BCE is subject that relate to the identification and removal of barriers and the prevention of new barriers; and

<sup>48</sup> Those specific categories are the following: 2(b) Long-form documentary, 7 Drama and comedy, 9 Variety, 11(a) General entertainment and human interest and 11(b) Reality television, set out in item 6 of Schedule I to the Specialty Services Regulations, 1990 (the Regulations), as well as programming targeting children.

<sup>49</sup> Appendix 2 to BRP 2023-306, COL 11; and Broadcasting Regulatory Policy CRTC 2015-104, Let's Talk TV - Navigating the Road Ahead - Making informed choices about television providers and improving accessibility to television programming.

<sup>50</sup> Appendix to BRP 2011-741-1, paragraph 4.

<sup>51</sup> Appendix 1 to BRP 2019-308, paragraph 4.

<sup>52</sup> Broadcasting Decision CRTC 2023-245, Various television programming services and networks, and broadcasting distribution undertakings – Administrative renewals; BRP 2019-392, paragraph 43.

<sup>53</sup> CRTC Accessibility Reporting Regulations (SOR/2021-160), sections 8, 11, and 15.

<sup>54</sup> Ibid., sections 4, 10, and 14.

- 51(1)(c) - the provisions of any regulations made under the Telecommunications Act that relate to the identification and removal of barriers and the prevention of new barriers and that apply to some or all of BCE.

This Appendix does not include requirements that have not been in force for at least three months before the day on which the Progress Report must be published<sup>55</sup> or expectations/encouragements, which do not rise to the level of imposed conditions.

## **1. Offering and Promotion of Accessible Products and Services**

- Wireless Service Providers (WSPs) must offer mobile wireless service plans that meet the needs of Canadians with disabilities.<sup>56</sup>
- WSPs must promote and publicize their disability-specific products and services on their websites and using other methods.<sup>57</sup>
- WSPs must offer at least one type of wireless mobile handset that will provide access for persons who are blind and/or have moderate-to-severe mobility or cognitive disabilities.<sup>58</sup>
- Telecommunications Service Providers (TSPs) must make general call centres accessible to the point of providing a reasonable accommodation by training customer service representatives to handle questions from persons with disabilities and familiarizing customer service representatives with accessible products and services.<sup>59</sup>
- Internet Service Providers (ISPs) subject to the Internet Code must ensure that customer service representatives receive training on rights and responsibilities under the Internet Code, including accessibility needs.<sup>60</sup>
- TSPs must make their interactive voice response (IVR) systems accessible. A service provider with a disability call centre could meet this requirement by developing and implementing a process for the appropriate transfer of calls to that call centre.<sup>61</sup>
- A Critical Information Summary, provided under either the Internet Code or the Wireless Code, must set out information, including about the extended trial period for customers who self-identify as having a disability.<sup>62</sup>

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<sup>55</sup> See the Accessible Canada Act (S.C. 2019, c. 10), section 51(6) with respect to Accessibility Plan. This approach adopted for Progress Report.

<sup>56</sup> Telecom Regulatory Policy CRTC 2016-496, Modern telecommunications services – The path forward for Canada's digital economy, paragraph 212.

<sup>57</sup> Ibid., paragraphs 56 and 214.

<sup>58</sup> BTRP 2009-430, paragraph 44.

<sup>59</sup> Ibid., paragraph 69.

<sup>60</sup> Telecom Regulatory Policy CRTC 2019-269, The Internet Code, paragraph 463.

<sup>61</sup> BTRP 2009-430, paragraph 69.

<sup>62</sup> TRP 2019-269, Appendix 1 C.1(iii); and Telecom Regulatory Policy CRTC 2017-200, Review of the Wireless Code, Appendix 1 C.1(iii).

- ISPs subject to the Internet Code must file compliance reports including a description of how they are ensuring that their customer service representatives are knowledgeable about rights and responsibilities under the Internet Code, including those related to persons with disabilities.<sup>63</sup>
- Certain WSPs must create and promote videos in American sign language (ASL) or langue des signes québécoise (LSQ) to promote the Wireless Code and explain common terminology.<sup>64</sup>
- ISPs subject to the Internet Code must create and promote videos in ASL/LSQ to promote the Internet Code, including the extended trial period for persons with disabilities, and explain common terminology.<sup>65</sup>
- TSPs that will transition to ten-digit local dialing in order to implement 9-8-8 must provide information about the transition to ten-digit local dialing in ASL and LSQ.<sup>66</sup>
- WSPs must engage in regular, at least yearly, consultations with persons with disabilities and groups representing their interests.<sup>67</sup>
- WSPs must file annual reports in an accessible format regarding accessible plans and ongoing consultations. These annual reports must include certain types of information specified by the Commission.<sup>68</sup>

## **2. Message Relay Service (MRS)**

- All local exchange carriers (LECs) must provide teletypewriter (TTY) and Internet protocol (IP) Relay services to their telephone customers 24 hours a day, 7 days a week.<sup>69</sup>
- WSPs must provide IP Relay to their retail customers 24 hours a day, 7 days a week.<sup>70</sup>
- MRS Providers<sup>71</sup> providing IP Relay and MRS Providers with an obligation to provide TTY must meet the minimum requirements set out in Appendix 1 to TRP 2018-466.<sup>72</sup>

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<sup>63</sup> TRP 2019-269, paragraph 469.

<sup>64</sup> TRP 2017-200, paragraphs 377 and 382.

<sup>65</sup> TRP 2019-269, paragraph 466.

<sup>66</sup> Telecom Regulatory Policy CRTC 2022-234, Introduction of 9-8-8 as the three-digit abbreviated dialing code for mental health crisis and suicide prevention services and Northwestel Inc.'s application for modified implementation of ten-digit local dialing, paragraph 142.

<sup>67</sup> Telecom Regulatory Policy CRTC 2023-41, Mobile wireless service plans that meet the needs of Canadians with various disabilities, paragraph 140.

<sup>68</sup> TRP 2023-41, paragraphs 141 to 142.

<sup>69</sup> BTRP 2009-430, paragraphs 11 and 21.

<sup>70</sup> Telecom Regulatory Policy CRTC 2018-466, Review of the regulatory framework for text-based message relay services, paragraph 31.

<sup>71</sup> As defined in *ibid.*, paragraphs 9 to 12.

<sup>72</sup> *Ibid.*, paragraphs 153 and 156, and Appendix 1.

- Certain TSPs must file annual reports on quality of service data, as set out in Appendix 2 to TRP 2018-466.<sup>73</sup>
- TSPs must fund video relay service (VRS) via the National Contribution Fund.<sup>74</sup>
- Bell Canada and certain affiliates must equip certain of their payphones with TTY.<sup>75</sup>
- WSPs must take steps to ensure that Deaf and Hard of Hearing sign language users are able to make and receive calls through VRS in a comparable way to hearing users accessing voice services.<sup>76</sup>

### **3. Trial Periods**

- If a customer self-identifies as a person with a disability, then ISPs subject to the Internet Code must offer an extended trial period of at least 30 days, and the permitted usage amounts must be at least double the service provider's usage limits for the standard trial period.<sup>77</sup>
- If a customer self-identifies as a person with a disability, then WSPs must offer a 30 day extended trial period, and the permitted usage amounts must be at least double the service provider's usage limits for the standard trial period. WSPs must also promote the extended trial period in the accessibility section of their website.<sup>78</sup>

### **4. 9-1-1**

- MRS providers must provide access to 9-1-1 service.<sup>79</sup>
- WSPs and incumbent local exchange carriers (ILECs) must provide Text with 9-1-1 service.<sup>80</sup>

### **5. Alternative Formats**

- TSPs must provide paper bills upon request at no charge to customers who self-identify as a person with a disability.<sup>81</sup>
- Canadian carriers must provide bills, bill inserts, and information setting out the rates, terms and conditions in alternative accessible formats, such as in braille or large print, for people with a visual disability.<sup>82</sup>

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<sup>73</sup> Ibid., paragraph 163 and Appendix 2.

<sup>74</sup> Telecom Regulatory Policy CRTC 2014-187, Video relay service.

<sup>75</sup> Telecom Decision CRTC 2004-47, Access to pay telephone service, paragraphs 144 to 148.

<sup>76</sup> TRP 2023-41, paragraph 146.

<sup>77</sup> TRP 2019-269, Appendix 1 G.2.

<sup>78</sup> TRP 2017-200, Appendix 1 G.4(iv) and paragraph 327.

<sup>79</sup> TRP 2018-466, paragraph 229.

<sup>80</sup> Telecom Decision CRTC 2013-22, CISC Emergency Services Working Group – Consensus report regarding Text Messaging with 9-1-1 trial and service implementation.

<sup>81</sup> Telecom and Broadcasting Decision CRTC 2022-28, When and how communications service providers must provide paper bills.

<sup>82</sup> Telecom Order CRTC 98-626; TD 2002-13, Extending the availability of alternative formats to consumers who are blind; and, TO 2001-690, Alternative formats for a person who is blind.

- ISPs subject to the Internet Code must provide a copy of the contract, related documents, and Critical Information Summary in an accessible format for persons with disabilities upon request, at no charge.<sup>83</sup>
- WSPs must provide a copy of the contract, related documents, and Critical Information Summary in an accessible format for persons with disabilities upon request, at no charge.<sup>84</sup>
- ILECs/TSPs, as applicable, must provide the following documents in alternative formats to persons with visual impairments, upon request: information on the National Do Not Call List, information on Bill Management Tools, retail quality of service information, notification of the removal of the last payphone in a community, the incumbent local exchange carriers' communications plans on local forbearance, and information on dialing plan changes.<sup>85</sup>
- Accessibility plans, progress reports, and descriptions of feedback processes published under the ACA must be made available, upon request, in print, large print, braille, audio format, electronic format that is compatible with adaptive technology that is intended to assist persons with disabilities, or any other format that the person and the regulated entity agree upon and for which there is proof of the agreement.<sup>86</sup>

## **6. Website Accessibility**

- TSPs must make the information on telecommunications and broadcasting services and products on their websites accessible to the point of providing a reasonable accommodation for persons with disabilities.<sup>87</sup>
- TSPs must make customer service functions that are available solely over the service providers' websites accessible. If a customer service function on the service providers' website is not accessible, then persons with disabilities can not be charged or disadvantaged for using an alternate channel to access those functions<sup>88</sup>
- TSPs must have an easy-to-find home page link to the accessibility section of their websites, if their websites include such sections.<sup>89</sup>
- If a service provider subject to the Internet Code applies overage fees, the service provider must offer tools, at no charge, to help a customer monitor and manage their

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<sup>83</sup> TRP 2019-269, Appendix 1 B.4(i) and C.1(v).

<sup>84</sup> TRP 2017-200, Appendix 1 B.1(ii), B.2(v), and C.1(v).

<sup>85</sup> Telecom Regulatory Policy CRTC 2010-132, Follow-up to Broadcasting and Telecom Regulatory Policy 2009-430— Requirements for telecommunications service providers to communicate certain information in alternative formats.

<sup>86</sup> CRTC Accessibility Reporting Regulations (SOR/2021-160), sections 24, 27, and 31.

<sup>87</sup> BTRP 2009-430, paragraph 65.

<sup>88</sup> Ibid., paragraph 68.

<sup>89</sup> Ibid., paragraph 57.



data usage and any additional fees incurred during a monthly billing cycle. These tools must be accessible to customers with disabilities.<sup>90</sup>

- MRS providers must ensure that any IP Relay related web and mobile interfaces meet W3C Web Content Accessibility Guidelines (WCAG).<sup>91</sup>
- Accessibility plans, progress reports, and descriptions of feedback processes published under the ACA must be published in a way that meets WCAG guidelines.<sup>92</sup>

## **7. Passing On Obligations**

- Canadian carriers, as a condition of offering and providing telecommunications services to non-carriers,<sup>93</sup> must include in their tariffs and in service contracts or other arrangements with these non-carriers, the requirement that the non-carriers and all of their wholesale customers and subordinate wholesale customers, abide by certain obligations, including those set out in the Appendix to TRP 2017-11 related to accessibility and the removal of barriers.<sup>94</sup>

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<sup>90</sup> TRP 2019-269, Appendix 1 E.2(i).

<sup>91</sup> TRP 2018-466, paragraph 151.

<sup>92</sup> CRTC Accessibility Reporting Regulations (SOR/2021-160), sections 21, 26, and 30.

<sup>93</sup> As defined in Telecom Regulatory Policy CRTC 2017-11, Application of regulatory obligations directly to non-carriers offering and providing telecommunications services, paragraph 29.

<sup>94</sup> Ibid.