



26 June 2024

Marc Morin  
Secretary General  
CRTC  
Ottawa, ON K1A 0N2

Filed online

Dear Secretary General,

**Re: *Call for comments – Development of a regulatory policy for closed captioning provided by online streaming undertakings*, [Broadcasting Notice of Consultation CRTC 2024-137](#) (Ottawa, 25 June 2024) – complaints about captioning – procedural request by the Forum for Research and Policy in Communications (FRPC)**

1 The Forum for Research and Policy in Communications (FRPC) is a non-profit and non-partisan organization established in 2013 to undertake research and policy analysis about communications, including broadcasting and telecommunications.

2 On 25 June 2024 the CRTC invited comments in Broadcasting Notice of Consultation CRTC 2024-137 (2024-137) about developing a regulatory policy for closed captioning provided by online streaming undertakings. At paragraph 7 the Commission listed seven issues, including “availability of closed captioning”, “quality of closed captioning”, “reporting and compliance” and “addressing complaints”. At paragraph 28 2024-137 states that “Addressing and responding to complaints from viewers about closed captioning is critical to ensuring quality and reliability for those who need it.” At paragraph 29 the CRTC explained that it

... currently accepts complaints on closed captioning and it takes action based on those complaints. In general, when the Commission receives a complaint from a viewer, it requests a response from the broadcaster and shares that response with the complainant. It can also request that a broadcaster submit its monthly accuracy rate calculations, that it calculate the accuracy rate of a specific program that is the subject of the complaint, or ask for a copy of the program in question.

3 2024-137 then asks six questions related to complaints:

How should complaints about closed captioning of programs provided by online streaming undertakings be addressed?

Do online streaming undertakings have a method for viewers to file a complaint about closed captioning?

Should there be standards with respect to addressing these types of complaints?

How can complaints processes be made as transparent as possible?

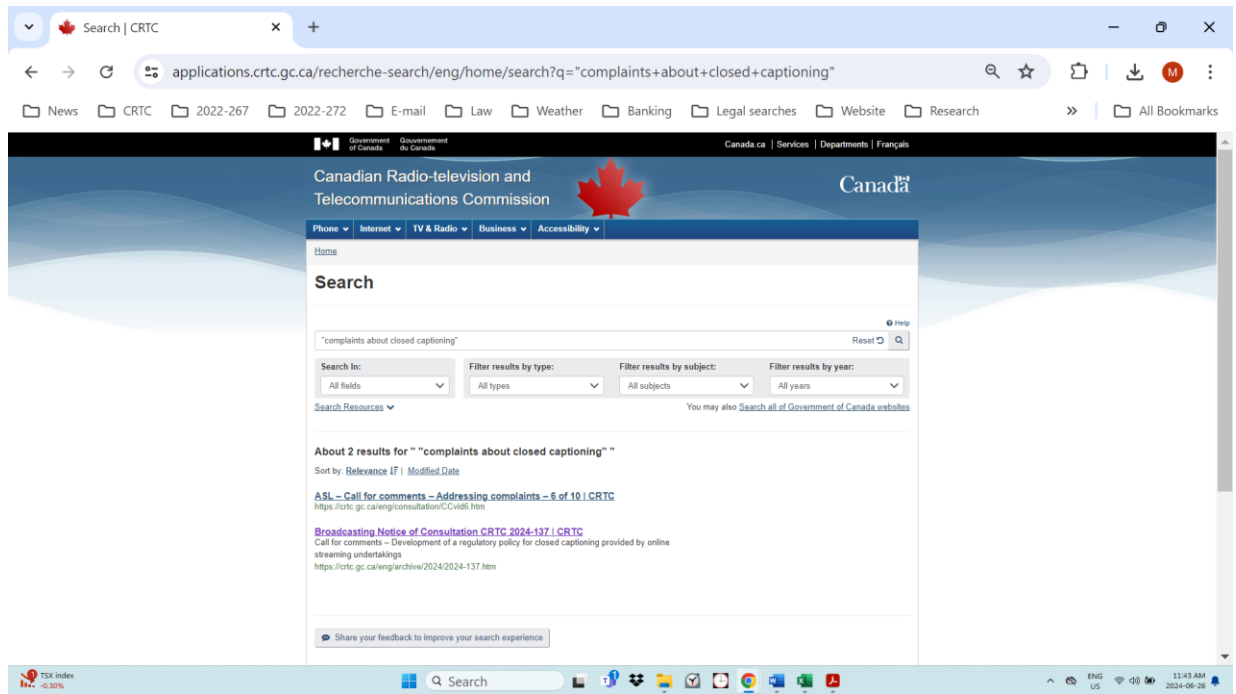
When should the Commission intervene, if at all?

Should online streaming undertakings be required to retain copies of captioned programs for the purposes of addressing complaints, particularly after the content has been removed from their platforms? If so, for how long?

[2024-137 numbering omitted]



- 4 The CRTC’s website states that it “accepts complaints about problems with closed captioning, and it can take action based on those complaints” (“[TV Access for People who are Deaf or Hard of Hearing: Closed Captioning](#)”: “[Registering a complaint about closed captioning](#)”). Yet 2024-137 does not include any information about the closed-captioning complaints the CRTC has received or the action it has taken in the event it believed compliance issues existed. A search undertaken on 26 June 2024 using the CRTC’s search engine did not disclose any quantitative information about the “complaints about closed captioning” available on the CRTC’s public website:



- 5 FRPC submits that evidence about the numbers of complaints the CRTC has received about closed captioning and its responses to these complaints are relevant to the issues set out by the CRTC in the 2024-137 proceeding including compliance, transparency and standards. FRPC asks that the CRTC publish summary information about closed-captioning complaints it has received since 1 January 2014 on the 2024-137 public record before the end of July 2024 so as to enable interveners to review and assess this information before the proceeding’s 19 August 2024 deadline.

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