



11 September 2025

Filed online

Marc Morin
Secretary General
CRTC
Ottawa, ON K1A 0N2

Dear Secretary General,

Re: *Call for comments – Consumer protections in the event of a service outage or disruption, Telecom and Broadcasting Notice of Consultation CRTC 2025-227* (Gatineau, 4 September 2025) – Procedural request – Clarification regarding costs

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. FRPC intends to intervene in the above-noted proceeding that addresses matters within the CRTC's jurisdiction under both the *Broadcasting Act* and the *Telecommunications Act*.
3. The 2025-227 deadline for interventions is 13 November 2025 and final replies are due 15 December 2025.

BPF-FPR will not accept cost claim applications after 24 October 2025

4. Two working days before the CRTC issued 2025-227 the Broadcasting Participation Fund (BPF), Inc./Le fonds de participation à la radiodiffusion (FPR) [announced that it will stop accepting broadcast cost applications after 24 October 2025](#):

September 2nd, 2025

Please be advised that, in an effort to better manage fund exhaust, the Board of the BPF has voted to no longer accept interim claims effective September 2, 2025.

Additionally, the Board notes that until new funding has been identified, the next and final intake date for cost award claims will be October 24, 2025. We encourage all applicants to plan accordingly and ensure any final submissions are made within these timelines. Should you have any questions or require assistance, please don't hesitate to reach out.

5. Three working days after the Commission issued 2025-227 the BPF-FPR informed the Commission that because the Fund used to reimburse participation costs in CRTC broadcasting proceedings “**will be depleted by the end of 2025**” without new funding, it will not accept cost-claim applications after 24 October 2025.¹
6. Consequently, public-interest participants whose comments in the 2025-227 proceeding address television service providers – regulated under the *Broadcasting Act* – will be unable to apply for the reimbursement of their costs from the BPF-FPR, as it will have stopped accepting cost-claim applications seven weeks before the deadline for final replies in the 2025-227 proceeding.

Request for clarification

7. Earlier this year on 15 July 2025, the CRTC issued *Call for comments – Improving the public alerting system*, [Telecom and Broadcasting Notice of Consultation CRTC 2025-180](#). The Commission stated in that proceeding that all cost applications would be addressed through the telecom-costs process under the *Telecommunications Act*’s regime:

Applications for costs

For the sake of simplicity and ease of access, all costs applications in this proceeding will use the telecommunications costs process and be reviewed and assessed under the regime set out in the *Telecommunications Act*.

The Commission considers that active participation of individuals and groups that represent the public interest provide a valuable contribution to its decisions. These individuals and groups may require financial assistance to effectively participate in Commission proceedings. To understand how to apply for costs after the proceeding, please visit the Commission’s “[How to claim telecommunications proceeding expenses](#)” page.

[website link in original text]

8. TBNoC 2025-227, however, is silent regarding the costs process to be used in that proceeding.
9. The Forum is therefore submitting this two-part procedural request. FRPC asks first, that the Commission clarify whether it will also address all cost applications in the 2025-227 proceeding as set out in 2025-180.
10. Second, FRPC respectfully asks that the CRTC expedite or accelerate its answer to this procedural request to enable public-interest participants to plan their participation accordingly.

¹ *Ibid.*, at paragraphs 54 and 56, bold font in original text.



Thank you for your consideration of this request.

Monica Auer, M.A., LL.M.
Executive Director
Forum for Research and Policy in Communications (FRPC)
613-618-0224
execdir@frpc.net

cc. Leila Wright, CRTC (Leila.Wright@crtc.gc.ca)
Scott Shortliffe, CRTC (scott.shortliffe@crtc.gc.ca)
Scott Hutton, CRTC (scott.hutton@crtc.gc.ca)
Teresa Griffin-Muir (bpf@welchllp.com)
CIPPIC (mdupuis7@uottawa.ca)
Jeffrey Beatty, DWCC (chair@deafwireless.ca)
Ken Whitehurst (whitehurst@consumerscouncil.com)
Cori Ferguson (cori.ferguson@consumerscouncil.com)
Matt Hattfield (matt@openmedia.ca)
Alexandre Plourde (aplourde@option-consommateurs.org)
Maxime Dorais (mdorais@uniondesconsommateurs.ca)
Geoff White (gwhite@piac.ca)
Philippe Gauvin (bell.regulatory@bell.ca)
Mélanie Cardin (regaffairs@quebecor.com)
Marielle Wilson (regulatory.matters@corp.eastlink.ca)
Dean Shaikh (regulatory@rci.rogers.com)
Stephen Schmidt (regulatory.affairs@telus.com)