



16 October 2025

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Marc Morin
Secretary General
CRTC
Ottawa, ON K1A 0N2

Dear Secretary General,

Re: *Call for comments – Removing barriers to identifying and accessing programming, Broadcasting Notice of Consultation CRTC 2025-272 (Gatineau, 16 October 2025) – FRPC procedural requests (Ottawa, 16 October 2025)*

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. FRPC intends to intervene in the above-noted proceeding.
2. FRPC is writing to seek clarification from the Commission regarding two aspects of the procedures in the 2025-272 proceeding: whether materials on the public record for two proceedings concerning related issues are incorporated by reference in this proceeding, and whether the CRTC intends that qualified public-interest participants be reimbursed for participating in the 2025-272 proceeding through its telecom costs process.
1. **Related CRTC proceedings**
3. BNoC 2025-272 states at paragraph 7 that the Commission is aiming “to align the regulatory requirements imposed on broadcasting undertakings with the policy objectives of the *Broadcasting Act* and the purpose and principles of the *Accessible Canada Act*, which aims to make Canada free from barriers for persons with disabilities by 2040....”. BNoC 2025-272 also states at paragraph 11 that “the Commission proposes to amend current accessibility requirements for licensees as set out in the appendices to this notice.”
4. On 25 June 2024 the CRTC issued Broadcasting Notice of Consultation CRTC 2024-137 and also Broadcasting Notice of Consultation CRTC 2024-138:

Call for comments – Development of a regulatory policy for closed captioning provided by online streaming undertakings, Broadcasting Notices of Consultation CRTC [2024-137](#) (Ottawa, 25 June 2024), [2024-137-1](#) (Ottawa, 10 September 2024) and [2024-137-2](#) (Ottawa, 18 November 2024);



Call for comments – Development of a regulatory policy for the distribution of described video and audio description, Broadcasting Notices of Consultation CRTC [2024-138](#) (Ottawa, 25 June 2024) and [2024-138-1](#) (Ottawa, 19 September 2024).

5. BNoC 2024-137 stated that the CRTC wished “to identify, remove and prevent barriers to access online content for persons who are Deaf or hard of hearing” by developing “a regulatory policy regarding closed captioning of programs provided by online streaming undertakings operating in Canada” (paragraph 6). BNoC 2025-138 stated that the CRTC wished to “identify, remove and prevent barriers to access to programming for persons who are blind or partially sighted” by developing “a new regulatory policy for described video and audio description in the Canadian broadcasting system” (paragraph 6).
6. While according to the CRTC’s “[Public proceedings](#)” page it has not yet issued decisions about either BNoC 2024-137 or BNoC 2024-138, the overarching objectives of these proceedings appear to overlap the objective of the 2025-272 proceeding – namely, to reduce or eliminate barriers to accessing broadcast programming content.
7. FRPC notes that in April 2025 the CRTC specifically invited parties to the 2025-52 proceeding to refer to submissions filed in another proceeding:
 4. The Commission is also examining issues regarding data collection, including reporting and confidentiality of collected data, as part of the proceeding initiated by Broadcasting Notice of Consultation 2024-288 regarding audio-visual services. Given certain similarities between the audio-visual and audio sectors regarding these issues, the Commission may consider applicable submissions filed in response to Broadcasting Notice of Consultation 2024-288 that address broad data-related issues, including reporting and performance measurement, as part of the present proceeding.
 5. Accordingly, the Commission invites interested persons and parties to include in their interventions comments on issues of confidentiality, safeguards and data collection for the audio sector. The Commission also invites interested persons and parties, when preparing their comments on these issues for the present proceeding, to refer to submissions filed in response to Broadcasting Notice of Consultation 2024-288 regarding data-related issues.

The Path Forward – Supporting Canadian and Indigenous audio content –Additional information to be considered in this proceeding, [Broadcasting Notice of Consultation CRTC 2025-52-3](#) (Gatineau, 15 April 2025)
8. FRPC therefore asks the CRTC to clarify whether parties may refer to submissions filed in the context of the 2024-137 and 2024-138 proceedings in their submissions to the current (2025-272) proceeding.



II. Mechanism for public-interest participants' costs

9. On 2 September 2025 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.

10. The deadline for replies in the current BNoC 2025-272 proceeding is 2 February 2026.
11. While the public-participation phase of the Telecom - Broadcasting Notice of Consultation CRTC 2025-94 proceeding ended on 9 October 2025, risks exist that the Commission may not issue its determination about the funding of public-interest participation in Commission proceedings before 2 February 2026 and that, even if it issues the 2025-94 decision before 2 February 2026, any new mechanism that it may approve may not be operational by 2 February 2026.
12. The Forum therefore asks that the Commission clarify whether qualified public-interest participants in the current proceeding should submit applications for costs through the CRTC's telecom costs process even though 2025-272 has been issued as a broadcasting proceeding.

The Forum appreciates and looks forward to the Commission's timely consideration of these requests.

Regards,

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