



# **BCE Accessibility Plan**

## **2023 – 2026**

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# 1.0 General

## Application

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

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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 Satellite Relay Distribution, 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

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

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

You can provide accessibility feedback (including feedback on this plan) or request an alternate format of our Accessibility Plan or description of our feedback process in a number of ways, including by:

Completing an online form

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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., Les Studios Telson 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., Telebec, ThinkTel, TotalTV Inc., TSN, Virgin Plus, VOX, VRAK, Xittel telecommunication and Z.

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,  
Montreal, Quebec 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, Customer Operations, Care.

Feedback can be provided anonymously.

Principles of the ACA

BCE's Accessibility Plan has been written in accordance with principles set out in the ACA (see Appendix A).

## **BCE Overview**

BCE is Canada's largest communications company, providing advanced Bell broadband wireless, Internet, TV, media and business communications services. With unmatched infrastructure investments in our world-class wireless and fibre networks, services and content, BCE delivers the world's best communications technologies for Canadians. Through Bell for Better, we are investing to create a better today and a better tomorrow by supporting the social and economic prosperity of communities across Canada.

Bell Media is Canada's leading content creation company with premier assets in television, radio, digital and out-of-home media. The company owns television stations that are part of the CTV and Noovo networks; specialty channels, including sports leaders TSN and RDS; direct-to-consumer streaming platforms including Crave, TSN, and RDS; digital destinations including CTV.ca and Noovo.ca.

## **Accessibility Statement**

BCE is committed to treating all people in a way that allows them to maintain their dignity and independence. Our purpose is to advance how Canadians connect with each other and the world – including persons with

disabilities. An important part of doing this is to identify, prevent, and remove barriers experienced by persons with disabilities.

## **2.0 Executive Summary**

When it comes to accessibility, every action counts. This includes how we engage with our team members, customers, and business partners.

We live in a diverse nation, serve a diverse customer base and work with a diverse group of people. That is why we are committed to fostering an inclusive, equitable and accessible workplace where all team members feel valued, respected and supported.

We strive to foster a working environment that increases knowledge and awareness on important topics such as diversity and accessibility, with an emphasis on creating positive change.

We have established an Accessibility Program Steering Committee that provides executive oversight of BCE's Accessibility Program. This steering committee is composed of senior executives. It plays an important role in enhancing the capacity and capabilities of BCE, driving our multi-year training strategy and supporting our feedback and consultation approach.



Committee members play an active role in project sponsorship, executive professional development, company-wide communications, employee engagement, and ensuring our Accessibility Program is a success.

We also strive to improve service for our customers, including persons with disabilities. For instance, Bell's industry-leading Accessibility Services Centre is a call centre dedicated to serving customers with disabilities.

To help create this Accessibility Plan, BCE consulted with persons with disabilities -- including customers, employees, and external organizations that specialize in accessibility. These consultations allowed us to outline opportunities to identify, remove and prevent barriers in:

- employment practices,
- built environment,
- information communication and technology (ICT),
- communication, other than ICT,
- procurement of goods, services and facilities,
- the design and delivery of programs and services.

In section 4, we outline various barriers we discovered and the actions we plan to take to resolve them.

### **3.0 Consultations**

Our consultation approach focused on identifying accessibility barriers experienced by persons living with many different types of disabilities. We provided varied methods for engagement to meet the needs of a diverse group of participants across Canada including language of choice (English and French) and preferred format for engagement.

The information we gathered enriched our learning experience and helped prioritize the actions that are central to our Accessibility Plan. As part of our consultation approach, we:

- Established an Employee Resource Group with team members who identify as persons with disabilities and have experience with accessibility barriers, team members experienced in the field of accessibility, and allies involved in supporting diversity, equity, inclusion and belonging.
- Established an Advisory Panel made up of internal and external stakeholders. This includes organizations and individuals who identify as persons

with disabilities or who are experienced in the field of accessibility in Canada, representing varied geographies and stakeholders with different accessibility needs.

- Conducted a series of virtual consultation sessions and one-on-one interviews with team members and members of the public who identified as persons with disabilities. A leading vendor in the field of accessibility facilitated the sessions.
- Participated in the Canadian Wireless Telecommunications Association (CWTA) consultation activities. These activities included surveying, data collection, and virtual consultation sessions with persons with disabilities and organizations working within the disability community or within the disability sector in Canada.

## 4.0 Key Areas

BCE's Accessibility Plan reflects barriers we identified as part of our consultation approach and details the actions we will take to identify, prevent and remove various barriers experienced by persons with disabilities. Our actions can be divided into three timeframes:

- short-term actions,

- medium-term actions,
- long-term actions.

There are also ongoing actions we must take to ensure we continue to make progress.

Our initial actions will focus on the areas outlined in the sections below. We will provide updates on our progress annually and adapt our plans as we identify new barriers and learn from our progress.

## **Employment**

Resolving employment-related barriers helps ensure everyone has the same employment opportunities at BCE. We are committed to a safe and supportive workplace and promoting a culture that values diversity, equity, inclusion and belonging.

Identified Barriers:

- There is a need for greater engagement, promotion, and communications to support accessibility, encourage self-disclosure and enhance a supportive workplace culture and community.

- Team members who self-identify as persons with disabilities or who see themselves as an ally would like a centralized, coordinated way to collaborate.
- Team members could have better awareness of the available accommodations – or the barriers experienced – by persons with disabilities.
- The process to accommodate for disabilities is considered cumbersome; there is a lack of awareness of the support available for employees and their managers during the accommodation process.
- There is a lack of clarity among job applicants, recruiters and hiring managers on the types of accommodations available for persons with disabilities who are applying, interviewing, and qualifying for jobs.

#### Actions and Timelines:

##### Short-Term:

- Begin rollout of enhanced accessibility training.
- Encourage participation through our Employee Resource Groups, such as Diversability at Bell.
- Promote forums for collaboration, information sharing, and discussion.

- Increase awareness of BCE's accommodation process for applicants, team members, and leaders.

#### Medium-Term:

- Continue rollout of enhanced accessibility training.
- Review and evaluate the effectiveness of training.
- Review and evaluate the effectiveness and team member experience of our Employee Resource Group.
- Review and adjust current processes to support an improved candidate experience. Processes must provide more information and guidance to recruiters, hiring managers, and candidates to support accessibility and accommodation requirements.

#### Long-Term:

- Further elevate leaders' familiarity with accommodation processes and practical ways to increase inclusion and accessibility in the workplace.
- Create a consolidated inventory of resources used to support accommodation.

- Use internal feedback and consultations and collaborate with persons with disabilities to ensure that accessibility standards are integrated across our business – including workplace policies, employment standards, programs, and work environments.

### Ongoing:

- Continue to create awareness of accessibility to foster a more inclusive workplace.
- Continue to support hiring managers and recruitment teams to broaden their perception and provide them with the information and resources they need to support a more inclusive and accessible workplace.
- Continue to enhance our accommodation processes.
- Continue to evaluate how well our processes for workplace accommodation are performing.
- Continue to improve how we engage and collaborate with persons with disabilities.

## **The Built Environment**

Addressing barriers related to the built environment helps us ensure that people using our offices, buildings, and retail spaces have barrier-free access. We will continue

our efforts to retrofit existing spaces and improve planning for new builds. We will work with our team members and external partners to better understand and address barriers experienced by persons with disabilities.

#### Identified Barriers:

- Product placements, counters and displays may create physical barriers or block pathways.
- Noise levels or lighting in certain spaces may create challenges for persons with disabilities.
- Wayfinding and signage is sometimes complex or difficult to navigate.
- Increasingly, team members do not have assigned office space in our offices and move from location to location. This may make it difficult for some team members to locate their colleagues as easily as they had before.

#### Actions and Timelines:

##### Short-Term:

- Ensure team members know all spaces must be clear of physical barriers to enable customer mobility and



encourage the use of a barrier-free ledge on checkout counters.

- Review existing store operating procedures and manuals to ensure they promote barrier-free pathways; remove such barriers and proactively ensure these barriers do not occur in the future.
- Refer employees and leaders to the accommodation process if physical barriers are identified in the workplace.

#### Long-Term:

- Review retail layout designs to identify opportunities to improve accessibility and the retail shopping experience.
- Explore implementation of workspace wayfinding and navigation including the use of mobile applications.
- Develop and include accessible signage standards when retrofitting buildings and renovating workspaces.

Ongoing:

- Continue efforts to include accessibility upgrades as part of building retrofits and renovation of workspaces and existing retail locations.
- While retrofitting spaces, we will continue to select materials such as soft surfaces to help reduce noise levels.

## **Information and Communication Technologies**

By addressing information and communication technology-related barriers, we can achieve a high standard for digital accessibility. We apply a continuous improvement approach that endeavours to keep pace with technology advancements in our society. Our actions include plans to identify and resolve barriers found in our websites, mobile applications, networks, and telecommunication and computer systems used by customers and team members.

Identified Barriers:

- Websites and mobile apps may not always be easy to navigate because of the large volume of information; also, the language used may be too complex and difficult to understand.

- Websites and mobile apps may not offer alternate methods of communication for transactions.
- Chat tools, drop-down menus, selection of options, and online forms are not consistently accessible.
- There are opportunities to expand the availability of video content with consistent and accurate Described Video (DV) and Closed Captions (CC).
- Our products and services can be enhanced to provide more accessibility features - such as varied activation methods, audio prompts, visual prompts, and tactile markers.
- The amount of information required during an online transaction can sometimes be challenging. More time to complete a transaction may be required.

#### Actions and Timelines:

##### Short-Term:

- Adopt accessibility guidelines for information and communication technology.
- Make accessibility central in developing and buying devices and equipment.

- Standardize digital accessibility guidelines, policies and practices.
- Adopt universal design principles and best practices in digital accessibility.

#### Ongoing:

- Continue to improve websites and applications to enhance accessibility.
- Develop an audit program to monitor the accessibility of information and communication technology.
- Work with content providers, partners, manufacturers and vendors to improve accessibility features and ensure they are maintained.
- Continue to simplify our processes and use language that is concise and easy to understand.
- Continue to evaluate the accessibility of the information and communications technologies we use when addressing both internal and external audiences.
- Continuously improve training, tools, and support materials for team members to meet information and technology accessibility guidelines.

## **Communication, other than ICT**

By addressing communication-related barriers, we will improve the accessibility of the documents that we create at Bell. Our brand guidelines will provide direction on how to create documents and advertising that promote our products and services in a way that meets accessibility requirements.

### **Identified Barriers:**

- Customers may not be aware that they can request certain types of documents (such as bills and other documents that contain critical information) in alternate formats to meet their accessibility needs.
- Document templates and communication guidelines may not always be accessible.
- Alternate options and methods of communication are not consistently mentioned in marketing materials or advertisements.

## Actions and Timelines:

### Short-Term:

- Develop accessibility guidelines for creating documents.
- Improve customer awareness of the services provided by our Accessibility Service Centre.

### Ongoing:

- Promotion of accessibility products, services, and alternate options and methods of communications to increase awareness and usage.
- Continuous refinement of communication guidelines to create content that is simple, concise, and easy to understand.
- Ensure accessibility needs receive consideration in the development of marketing and advertising materials.

## **The Procurement of Goods, Services and Facilities**

We endeavour to ensure our procurement practices address accessibility procurement barriers, and encourage the use of suppliers who are part of our supplier diversity program. When interacting with new and existing suppliers, we communicate our accessibility expectations and requirements.

### Identified Barriers:

- Existing procurement practices may not consistently meet accessibility requirements.
- Actions and Timelines:

### Ongoing:

- Continue to evaluate current procurement policies, processes and tools to improve accessibility.

## **The Design and Delivery of Programs and Services**

By addressing the design and delivery of programs and service-related barriers, we aim to ensure persons with disabilities have meaningful options. We want to ensure

they are free to make their own choices, with support if they desire, regardless of their disabilities. This includes improving the accessibility of our systems and networks, and improving our efforts to provide great customer experiences.

#### Identified Barriers:

- Team members have different levels of knowledge and awareness when it comes to the barriers experienced by customers with disabilities, such as how to respond to inquiries and requests for accommodations.
- Accessible products and services are not broadly promoted to customers.
- Large service windows (the timeframe when a technician will visit a customer), limited hours of operation, or long waits in line at retail stores can make it challenging for persons with disabilities to access support when it is needed. Situations such as arranging for an interpreter or a support person, and planning times for a pick-up or a return of equipment by courier or at stores, all need consideration.
- Alternate options and methods of communications are not consistently made available to persons with



disabilities when they try to complete certain transactions, or when requesting support.

#### Actions and Timelines:

##### Medium-Term:

- Explore expansion of virtual on-demand sign language interpreter program.
- Optimize virtual assistants to support products and services related to accessibility.

##### Long-Term:

- Identify ways to improve systems and processes for common transactions such as booking a technician appointment for installations and repairs.

##### Ongoing:

- Continue to monitor customer surveys and feedback to identify areas for improvement.
- Continue to coach and train team members on best practices in customer service, for example: knowledge on how to send replacement equipment to customers with accessibility challenges.

- Explore ways to further increase customer awareness of Bell's accessibility products and services and of our Accessibility Services Centre.

## **Transportation**

Transportation does not currently apply to BCE's operations.

## **5.0 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 B.

### **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 B.

## **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 B.

## **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 C.

## **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 C.

## **6.0 Conclusion**

We believe we can make a real difference for persons with disabilities by addressing the barriers described in our Accessibility Plan. Our products and services are powerful tools that can advance how all Canadians connect with each other and the world. We are motivated by the opportunity to improve accessibility for our customers and team members, and to do our part to realize a barrier-free Canada.

As we implement our plan, we will continue to work and consult with persons with disabilities. We will publish an updated Accessibility Plan every three years, and communicate updates by publishing interim progress reports every year in between, in accordance with the ACA.

## 7.0 Appendices

### Appendix A – ACA Section 6, Principles

In preparing this Accessibility Plan, we have taken into account the principles set out in section 6 of the ACA.

- (a) all persons must be treated with dignity regardless of their disabilities;
- (b) all persons must have the same opportunity to make for themselves the lives that they are able and wish to have regardless of their disabilities;
- (c) all persons must have barrier-free access to full and equal participation in society, regardless of their disabilities;
- (d) all persons must have meaningful options and be free to make their own choices, with support if they desire, regardless of their disabilities;
- (e) laws, policies, programs, services and structures must take into account the disabilities of persons, the different ways that persons interact with their environments and the multiple and intersecting forms of marginalization and discrimination faced by persons;

- (f) persons with disabilities must be involved in the development and design of laws, policies, programs, services and structures; and
- (g) the development and revision of accessibility standards and the making of regulations must be done with the objective of achieving the highest level of accessibility for persons with disabilities.

## Appendix B – 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 Accessibility Plan must be published<sup>2</sup> or

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<sup>2</sup> According to the Accessible Canada Act (S.C. 2019, c. 10), section 42(6).



expectations/encouragements, which do not rise to the level of imposed conditions.

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

### **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>

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<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.

## **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

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<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.

captioning reaches the distributor of that signal in original form.<sup>8</sup>

- When providing CC, English- and French-language OS services 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

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

<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.

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:

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<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.

- 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>
- 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

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<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.

<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.

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

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<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.

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>

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<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.

## **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>
  - 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>

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<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.

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

<sup>25</sup> Ibid.



- 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>

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<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 2 to BRP 2016-436, Standard conditions of licence, expectations and encouragements for discretionary services, COL 11.

<sup>28</sup> Appendix 2 to BRP 2016-436, COL 12; and BTRP 2009-430.

- 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

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<sup>29</sup> Appendix 2 to BRP 2016-436, 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.

reaches the distributor of that signal, in its original form.<sup>32</sup>

- 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>

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

<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 1 to Broadcasting Regulatory Policy CRTC 2009-562-2, Conditions of licence for competitive Canadian specialty services operating in the genres of mainstream sports and national news – Definition of “broadcast day” for mainstream sports 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

- 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>

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services) and in BRP 2019-308 (English-language services).

<sup>36</sup> Appendix 1 to BRP 2009-562-2, COL 7; and BTRP 2009-430.

<sup>37</sup> Appendix to BRP 2015-436, 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 to BRP 2015-436, COL 9; and BTRP 2009-430.

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

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<sup>40</sup> Appendix to BRP 2015-436.

<sup>41</sup> Appendix 1 to BRP 2016-436, COL 13; and Appendix 2 to BRP 2016-436, COL 16.

<sup>42</sup> Appendix 1 to BRP 2009-562-2, COL 8.

<sup>43</sup> Appendix to BRP 2015-436, COL10.

### 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>

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<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,

- 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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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>

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<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 to BRP 2015-436, 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.



- 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>

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

<sup>52</sup> Broadcasting Decision CRTC 2022-180, Various large English-language and French-language television ownership groups – Administrative renewals; BRP 2019-392, paragraph 43.

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

- 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>

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

## **Appendix C – 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
- 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 Accessibility Plan must be published<sup>55</sup> or expectations/encouragements, which do not rise to the level of imposed conditions.

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<sup>55</sup> According to the Accessible Canada Act (S.C. 2019, c. 10), section 51(6).

## **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>

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<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.

- 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>
- Bell Canada and Bell Mobility must use funds from Bell Canada's deferral account to implement certain initiatives to enhance access to telecommunications services for persons with disabilities. Bell Canada and

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

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

Bell Mobility must file annual reports about these initiatives until the deferral funds are fully used.<sup>62</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>63</sup>
- 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>64</sup>
- Certain WSPs must create and promote videos in American sign language (ASL) or langue des signes

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<sup>62</sup> Telecom Decision CRTC 2014-527, Bell Canada and Bell Mobility Inc. – Further proposals for the use of deferral account funds to improve access to telecommunications services for persons with disabilities; and Telecom Decision CRTC 2015-563, Bell Canada and Bell Mobility Inc. – Show cause proceeding concerning the use of deferral account funds to improve access to telecommunications services for persons with disabilities.

<sup>63</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).

<sup>64</sup> TRP 2019-269, paragraph 469.

québécoise (LSQ) to promote the Wireless Code and explain common terminology.<sup>65</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>66</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>67</sup>
- WSPs must engage in regular, at least yearly, consultations with persons with disabilities and groups representing their interests.<sup>68</sup>
- WSPs must file annual reports in an accessible format regarding accessible plans and ongoing consultations.

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<sup>65</sup> TRP 2017-200, paragraphs 377 and 382.

<sup>66</sup> TRP 2019-269, paragraph 466.

<sup>67</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>68</sup> Telecom Regulatory Policy CRTC 2023-41, Mobile wireless service plans that meet the needs of Canadians with various disabilities, paragraph 140.

These annual reports must include certain types of information specified by the Commission.<sup>69</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>70</sup>
- WSPs must provide IP Relay to their retail customers 24 hours a day, 7 days a week.<sup>71</sup>
- MRS Providers<sup>72</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>73</sup>
- Certain TSPs must file annual reports on quality of service data, as set out in Appendix 2 to TRP 2018-466.<sup>74</sup>

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<sup>69</sup> TRP 2023-41, paragraphs 141 to 142.

<sup>70</sup> BTRP 2009-430, paragraphs 11 and 21.

<sup>71</sup> Telecom Regulatory Policy CRTC 2018-466, Review of the regulatory framework for text-based message relay services, paragraph 31.

<sup>72</sup> As defined in *ibid.*, paragraphs 9 to 12.

<sup>73</sup> *Ibid.*, paragraphs 153 and 156, and Appendix 1.

<sup>74</sup> *Ibid.*, paragraph 163 and Appendix 2.



- TSPs must fund video relay service (VRS) via the National Contribution Fund.<sup>75</sup>
- Bell Canada and certain affiliates must equip certain of their payphones with TTY.<sup>76</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>77</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>78</sup>
- If a customer self-identifies as a person with a disability, then WSPs must offer a 30 day extended trial period,

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<sup>75</sup> Telecom Regulatory Policy CRTC 2014-187, Video relay service.

<sup>76</sup> Telecom Decision CRTC 2004-47, Access to pay telephone service, paragraphs 144 to 148.

<sup>77</sup> TRP 2023-41, paragraph 146.

<sup>78</sup> TRP 2019-269, Appendix 1 G.2.

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>79</sup>

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

- MRS providers must provide access to 9-1-1 service.<sup>80</sup>
- WSPs and incumbent local exchange carriers (ILECs) must provide Text with 9-1-1 service.<sup>81</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>82</sup>

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<sup>79</sup> TRP 2017-200, Appendix 1 G.4(iv) and paragraph 327.

<sup>80</sup> TRP 2018-466, paragraph 229.

<sup>81</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>82</sup> Telecom and Broadcasting Decision CRTC 2022-28, When and how communications service providers must provide paper bills.

- 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>83</sup>
- 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>84</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>85</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

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<sup>83</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.

<sup>84</sup> TRP 2019-269, Appendix 1 B.4(i) and C.1(v).

<sup>85</sup> TRP 2017-200, Appendix 1 B.1(ii), B.2(v), and C.1(v).

plans on local forbearance, and information on dialing plan changes.<sup>86</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>87</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>88</sup>

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<sup>86</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>87</sup> CRTC Accessibility Reporting Regulations (SOR/2021-160), sections 24, 27, and 31.

<sup>88</sup> BTRP 2009-430, paragraph 65.

- 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>89</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>90</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 data usage and any additional fees incurred during a monthly billing cycle. These tools must be accessible to customers with disabilities.<sup>91</sup>
- MRS providers must ensure that any IP Relay related web and mobile interfaces meet W3C Web Content Accessibility Guidelines (WCAG).<sup>92</sup>

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<sup>89</sup> Ibid., paragraph 68.

<sup>90</sup> Ibid., paragraph 57.

<sup>91</sup> TRP 2019-269, Appendix 1 E.2(i).

<sup>92</sup> TRP 2018-466, paragraph 151.

- Accessibility plans, progress reports, and descriptions of feedback processes published under the ACA must be published in a way that meets WCAG guidelines.<sup>93</sup>

## **7. Passing On Obligations**

- Canadian carriers, as a condition of offering and providing telecommunications services to non-carriers,<sup>94</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>95</sup>

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<sup>93</sup> CRTC Accessibility Reporting Regulations (SOR/2021-160). sections 21, 26, and 30.

<sup>94</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>95</sup> Ibid.