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Secretary General
Canadian Radio-television and Telecommunications Commission
Ottawa, Ontario K1A 0N2
Canada

Re: Telecom and Broadcasting Notice of Consultation CRTC 2020-124

Dear Secretary General,

1. The Voice on the Net (VON) Coalition appreciates the opportunity to provide comments for the Canadian Radio-television and Telecommunications Commission's ("CRTC's" or "Commission's") consultation on new regulations for the Accessible Canada Act ("ACA") – important legislation that will promote equality of opportunity and increase the inclusion and participation of Canadians with disabilities.
2. VON is the leading advocacy organization for the Internet communications industry, working with policymakers to develop policies that support the availability and adoption of Internet communications products and services. For more information see: www.von.org.

Timing of Publication of Accessibility Plans and Progress Reports

3. After publication of the accessibility plans, regulated entities should be afforded at least two years to publish initial progress reports. This will provide regulated entities adequate time to implement their plans and assess progress against those plans. VON Coalition members concur that the ACA's three-year default period for publishing accessibility plans is appropriate. A three-year cycle for publication of subsequent reports should be adopted to ensure progress reports are published at the same point in time after an updated accessibility plan is released.

Requests for Alternative Formats

4. The CRTC should provide regulated entities flexibility in responding to requests for documents in alternative formats. The amount of time needed to provide such documents will vary, depending on the particular format requested. Such flexibility would ensure that the requester's "needs are met in the most efficient way possible."¹

Substance of the Feedback Process

5. The CRTC should also give regulated entities flexibility in responding to feedback. The specific nature of the feedback and complexity of issues raised will impact the amount of time needed before a response can be provided.

Manner of Publication and Form of Preparation

6. It is common for companies to publish information about the accessibility of their products and services on their websites. This is well-known to consumers and the companies' websites will be the first place they go to look for such information. In light of this, the VON Coalition recommends that publishing accessibility plans, progress reports, and feedback process descriptions on a regulated entity's website should be an acceptable way to meet its obligations, without requiring alternative or additional forms of publication. As for the form of publication, the CRTC should not mandate technical specifications such as font size and file type. Instead, the VON Coalition recommends that the Commission suggest that regulated entities look to guidance provided by existing, widely used accessibility standards, such as the World Wide Web Consortium's Web Content Accessibility Guidelines.² Further, covered entities should be given a reasonable amount of time (for example, 30 days) to provide notice to the CRTC when a document is published.
7. In the Consultation, the Commission expresses the view that its reporting regulations under the ACA should broadly align with those of other regulatory bodies under that legislation in order to reduce duplication for regulated entities and to make reporting instruments more easily understandable to accessibility stakeholders. In addition to reviewing ACA-related consultations from the Governor in Council and the Canadian Transportation Agency, the VON Coalition suggests that the CRTC also review regulated entities' reporting obligations under provincial accessibility legislation (e.g., Ontario). Due to the combined reporting obligations of the ACA and provincial legislation, regulated entities will

¹ See para. 120 of the Rules Practice and Procedure, available at <https://crtc.gc.ca/eng/archive/2010/2010-959.htm#z69>.

² Available at <https://www.w3.org/WAI/standards-guidelines/wcag/>.

be required to produce multiple, and possibly duplicative, reports for different jurisdictions across Canada. This will be costly and burdensome, especially for small and medium enterprises that may need to divert resources that otherwise would have been used to implement plans and improve accessibility for people with disabilities.

8. To reduce these burdens, VON Coalition members urge that a single reporting instrument that satisfies all reporting requirements across Canada be developed in collaboration with the Governor in Council, the Canadian Transportation Agency, and individual provinces. Such a reporting instrument would reduce duplication of efforts by enabling regulated entities to prepare and publish one comprehensive accessibility plan and progress report. Such standardization would benefit all stakeholders by improving efficiency, providing uniformity and clarity, and reducing cost burdens on government agencies.
9. We would be pleased to discuss any element in greater detail.

Sincerely,

Glenn S. Richards
Counsel to the VON Coalition

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