

# MEDIAACCESS CANADA

THE VOICE OF ACCESS 2020 GROUP OF ACCESSIBILITY STAKEHOLDERS

Submitted electronically

31 May 2015

John Traversey  
Secretary General  
CRTC  
Ottawa, ON  
K1A 0N2

Dear Mr. Secretary General,

**Re:** Call for comments on proposed amendments to the Canadian Radio-television and Telecommunications Commission Rules of Practice and Procedure made under the Broadcasting Act and The Telecommunications Act, CRTC 2015-115 (Ottawa, 31 March)

## Introduction

- 1** Media Access Canada (MAC) is a not-for-profit bilingual organization with a mandate to increase the quantity and quality of accessible content in Canada's broadcasting and telecommunication industry sector. MAC's board of directors is elected, bi-yearly, by the Access 2020 Group of Stakeholders<sup>1</sup> (Access 2020) who with and through MAC act as one united voice on key issues, to ensure broadcast and telecommunications are completely accessible to all Canadians (including those who are blind, have low vision, are deaf, hard of hearing or have cognitive or mobility disabilities) by the year 2020.
- 2** Since its inception, MAC has worked with the broadcast and accessibility industries to develop harmonized and professional accessibility standards, to promote education and awareness and to undertake research and development.

---

<sup>1</sup> [www.mediac.ca](http://www.mediac.ca)

*2 Bellwoods Park, Toronto, Ontario, Canada, M6J 1S4, e-mail: [info@mediac.ca](mailto:info@mediac.ca)*

# MEDIAACCESS CANADA

## THE VOICE OF ACCESS 2020 GROUP OF ACCESSIBILITY STAKEHOLDERS

- 3 We are providing our comments on the CRTC's ongoing review of its *Rules of Procedure*, in this case the CRTC's approach to licence renewals.
- 4 We would like to state very clearly our position of support for the proposed amendments as it will make the licence renewal process more efficient and will ensure that Canadians are informed earlier about upcoming licence renewals.
- 5 The CRTC licence renewal process is effectively the only tool with which the Commission is able to establish compliance of conditions of licence, conditions that impact a disabled Canadian's ability to fully engage in Canadian society.
- 6 As a volunteer organization, MAC would prefer to work with licencees as they develop their licence renewal applications, rather than react to an application once gazetted, as this often leads to MAC having to oppose a licence renewal. If MAC could work with a broadcaster in the preparation of their accessibility priorities for their next licence term, they would be less likely to oppose. Further, the broadcaster would have an opportunity to refine the application in advance of application submission.
- 7 MAC represents Access 2020 as a singular voice for accessible media. Access 2020 is a consortia of national, regional and local disability organizations across Canada. Engaging them in the process requires accessibility services such as CART, ASL interpretation and other alternative formats which in turn take additional time and resources. Having additional time to brief Access 2020, get feedback and work with the licensee would be a positive step for accessibility in Canadian media.
- 8 We believe by informing Canadians and MAC earlier about up-coming licence renewals, we will have the necessary time to work with broadcasters to ensure our priorities are reflected in their applications at a point in the process where they can work with us.

Thank you for the opportunity to comment on your proposals for new procedural rules concerning licence renewals. We look forward to reviewing the submissions of other parties.

# MEDIAACCESS CANADA

THE VOICE OF ACCESS 2020 GROUP OF ACCESSIBILITY STAKEHOLDERS

Sincerely yours,



Beverley Milligan  
CEO  
bmilligan@mediac.ca  
239-529-8785

\*\*\*\*\* end of document \*\*\*\*\*

