



Broadcasting Notice of Consultation CRTC 2025-272

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Gatineau, 16 October 2025

Public record: 1011-NOC2025-0272

Call for comments – Removing barriers to identifying and accessing programming

Deadline for submission of interventions: 15 December 2025

Deadline for submission of replies: 2 February 2026

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Summary

When the *Online Streaming Act* came into force, it amended the *Broadcasting Act* to include a policy objective for programs broadcasted in Canada to be accessible without barriers to persons with disabilities. The Commission is working on concrete ways to identify, prevent and eliminate barriers to accessibility.

In this public proceeding, the Commission is gathering views on whether it should update and expand certain accessibility requirements for broadcasting undertakings that were put into place in 2015. Strengthening these requirements will help the Commission continue to identify, remove and prevent barriers to accessing programs for persons with disabilities. This proceeding will also help make the broadcasting system more accessible, further the policy objectives of the *Broadcasting Act*, and help ensure consistency with the *Accessible Canada Act*.

The deadline for comments is **15 December 2025**. Only parties to this proceeding (which includes parties who file comments as well as any persons carrying on undertakings that may be affected by the changes proposed in this notice) may file a reply to matters raised during the comment phase. The deadline for the filing of replies is **2 February 2026**.

The Commission will accept video comments and replies in American Sign Language (ASL) and Langue des signes québécoise (LSQ) for this proceeding.

Introduction

Why is the Commission launching this consultation?

1. Persons with disabilities should be able to independently access programs, regardless of whether they are accessing programming online or through traditional television services.

2. In Broadcasting Decision 2025-271, the Commission determined that there are barriers to the accessibility of programming that negatively impact persons who are blind or partially sighted, that the current requirements are insufficient to fully address these barriers, and that voluntary removal of barriers does not appear to be enough to ensure equitable access.
3. Barriers to accessibility, like the provision of set-top boxes¹ without screen readers, are preventing individuals who are blind or partially sighted from independently accessing programming.
4. Many individuals who are blind or partially sighted rely on screen readers to access programming. Screen readers read aloud on-screen text and provide auditory descriptions. They remove barriers that would prevent users from independently identifying and selecting programming content and navigating between different menu options. Similarly, many individuals who have a fine motor skill disability rely on accessible remote controls or voice recognition features to access programming.
5. In both cases, such technologies remove barriers that would otherwise prevent these individuals from independently identifying and selecting programming content and navigating between different menu options.
6. The Commission first began requiring certain licensees to provide an accessible means of accessing programming approximately a decade ago.² The modernized *Broadcasting Act* (the Act) reinforces the importance of the provision of programming content that is accessible without barriers to persons with disabilities³ within Canadian broadcasting system.
7. In this consultation, the Commission aims 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. The *Accessible Canada Act* also states that all persons are to have barrier-free access to full and equal participation in society, that policies must take into account the disabilities of persons, and that persons with disabilities must be involved in the development of those policies. The Commission also aims to align its regulatory requirements to the

¹ Commonly understood to be a device that connects to a television and enables customers to select channels and programming offered by their service provider. It may also include features such as allowing customers to record programs.

² Section 7.3 of the *Broadcasting Distribution Regulations* (the Regulations) came into force on 1 December 2015. See section 5 and subsection 27(2) of the *Regulations Amending the Broadcasting Distribution Regulations* (SOR/2015-239).

³ When the *Online Streaming Act* came into force, it amended the *Broadcasting Act* to include, as a policy objective, that programs should be accessible without barriers to persons with disabilities. See, for example, paragraphs 3(1)(p), 3(1)(p.1) and 5(2)(e.1) of the modernized *Broadcasting Act*. The *Broadcasting Act* refers to individuals who are blind or partially sighted as persons living with a visual impairment.

realities of the market, such as advancements in technology and market availability of these more advanced technologies.

8. This consultation advances one of the Commission's key priorities of implementing the modernized Act, which includes holding consultations on accessibility for persons with disabilities.
9. Important information on how parties can participate in this proceeding can be found in this notice at paragraphs 29 to 52 (under the heading "What you need to know to participate in this proceeding").

What is the Commission examining?

10. Persons with disabilities should have accessible options to access programming content that is available to them within the Canadian broadcasting system. Therefore, the Commission proposes to amend current accessibility requirements for licensees as set out in the appendices to this notice. This amendment changes section 7.3 of the *Broadcasting Distribution Regulations* (the Regulations) as follows (additions in bold, deletions struck out):

7.3 Except as otherwise provided ~~under a condition of its licence by an order made under subsection 9.1(1) of the Act in respect of its distribution undertaking~~, a licensee shall make available to its subscribers such equipment, software or other technology that will allow any individual who is blind ~~visually impaired~~ **or partially sighted** or who has fine motor skills disabilities to identify and have access to its programming services, including programs with described video ~~if that equipment, software or other technology is available for purchase by the licensee and is compatible with its distribution system.~~

11. A licensed broadcasting distribution undertaking (BDU), such as a cable company, is required by section 7.3 of the Regulations, with some exceptions, to offer accessible set-top boxes (or alternatives) to persons with disabilities so that they can identify and access its programming services.
12. As an example of an alternative, a company that only provides software would meet this requirement so long as its subscribers can identify and access its programming. Similarly, providing a set-top box that is accessible but that is operated by a remote that is not accessible would not meet this requirement.
13. This requirement only applies to certain licensees (e.g., cable companies and other BDUs). However, licensees are not the only companies providing access to programming. For example, unlicensed BDUs are not subject to this accessibility requirement. Online undertakings are also not subject to this requirement. These

include the online streaming services⁴ that are playing an increasingly prominent role in the Canadian broadcasting system.

14. The Commission has received evidence that some broadcasters are working to provide barrier-free access to their programming, but also that barriers remain present.⁵ As such, the Commission proposes to impose new requirements comparable to section 7.3 of the *Broadcasting Distribution Regulations* on online undertakings subject to the *Online Undertakings Registration Regulations*, as well as certain exempt terrestrial BDUs (i.e., an undertaking that serves more than 2,000 subscribers). This would make certain that these undertakings and BDUs are required to ensure that persons with disabilities can independently identify and access their programming.
15. To avoid imposing a significant regulatory burden on smaller services, the Commission will also consider limiting how any new requirement would be applied.

Call for comments

16. To implement the policy objectives of the *Broadcasting Act* and the purpose and principles of the *Accessible Canada Act*, including by identifying, removing and preventing barriers to accessing programming for persons with disabilities, the Commission proposes amending and expanding the existing accessibility requirements for broadcasting undertakings.
17. More specifically, the Commission is seeking comments on the following issues:
 - proposed amendments to section 7.3 of the Regulations;
 - a proposed requirement comparable to section 7.3 of the *Broadcasting Distribution Regulations* for certain online services (i.e., those subject to the *Online Undertakings Registration Regulations*);
 - a proposed requirement comparable to section 7.3 of the Regulations for certain exempt terrestrial BDUs (i.e., those with more than 2,000 subscribers); and
 - whether any other services should have a new requirement comparable to section 7.3 of the Regulations.

⁴ Online streaming services are broadcasting undertakings, as per the definition of “online undertaking” in the Act at subsection 2(1). Some exclusions, including those related to user-generated content, apply by virtue of subsections 2(2.1), 2(2.2) and 2(2.3).

⁵ See the record for the proceeding addressing the Part 1 application [2024-0069-6](#), which resulted in the publication of Broadcasting Decision 2025-271 and the launch of this consultation.

Proposed amendments to section 7.3 of the *Broadcasting Distribution Regulations*

18. The Commission is considering whether to amend section 7.3 of the Regulations, as set out in Appendix 1 to this notice.⁶

19. More specifically, the Commission proposes to:

- make section 7.3 of the Regulations more effective by removing the final clause of the provision, which limits its application by requiring that accessible equipment, software or other technology is available for purchase by the licensee and is compatible with its distribution system; and
- update some of the wording (e.g., “condition of its licence” and “visually impaired”).

20. The Commission is of the preliminary view that it should be the licensee’s⁷ responsibility to ensure that remaining barriers are removed.

21. Regarding the proposed amended requirement to section 7.3 of the Regulations, as outlined in paragraph 10, the Commission notes that:

- any licensee that already provides the “equipment, software or other technology” specified in section 7.3 of the Regulations would already be in compliance; and
- any licensee that does not provide such “equipment, software or other technology” would be able to request an exception while working to come into compliance.⁸

22. The Commission acknowledges that the amended requirement could present challenges to licensees that have not yet fully removed barriers to accessibility. Therefore, to give licensees time to come into compliance without needing to request a short-term exception, the Commission will, in the interest of administrative efficiency, consider whether the amended requirement should come into effect within one year of the publication of this notice.

⁶ The proposed changes are summarized below (changes are in bold and deletions are struck out):

7.3 Except as otherwise provided **by an order made** under **subsection 9.1(1) of the Act in respect** of its **distribution undertaking**, a licensee shall make available to its subscribers ~~such~~ equipment, software or other technology that **allows** any individual who is blind **or partially sighted** or who has fine motor skills disabilities to identify and have access to its programming services, including programs with described video—~~if that equipment, software or other technology is available for purchase by the licensee and is compatible with its distribution system.~~

⁷ Under the Regulations, “licensee” is defined as “a person who is authorized by a licence or a regional licence to carry on one or more distribution undertakings.”

⁸ That is, any such licensee could submit a Part 1 application requesting a condition of service that provided an exception to that requirement or an extension to the deadline for coming into compliance, as applicable.

23. Accordingly, the Commission invites interested persons to respond to the following questions:

Q1. Which specific impacts, challenges or opportunities may result from deleting “if that equipment, software or other technology is available for purchase by the licensee and is compatible with its distribution system” from section 7.3 of the Regulations? Please explain.

Q2. Should the Commission make other changes to section 7.3 of the Regulations? Please explain.

Q3. Should this amended requirement come into effect by 16 October 2026? Please explain.

Proposed new requirement for certain online undertakings

24. The Commission invites comments regarding whether certain online undertakings should be required to ensure that persons with disabilities can independently identify and access their programming, as specified in the proposed new requirement set out in Appendix 2 to this notice.

25. To avoid imposing a significant regulatory burden on smaller services and for regulatory consistency, the Commission will consider whether, for online undertakings, any new requirement should only apply to operators carrying on online undertakings subject to the requirements of the *Online Undertakings Registration Regulations*.⁹

Q4. Which impacts, challenges or opportunities may result from the proposed new requirement? Please explain.

Q5. Should the Commission set different thresholds for which online undertakings would have to adhere to the proposed new requirement? If so, what would be appropriate? Please explain.

Q6. Should the Commission make any changes to the proposed order in Appendix 2 to this notice? Please explain.

Q7. Should any new requirement come into effect by 16 October 2026? Please explain.

Proposed new requirement for certain exempt terrestrial BDUs

26. The Commission invites comments regarding whether certain exempt terrestrial BDUs should be required to ensure that persons with disabilities can independently

⁹ At this time, certain online undertakings have been exempted from that requirement pursuant to the exemption order (Broadcasting Order 2023-330) set out in Appendix 2 to Broadcasting Regulatory Policy 2023-329, which establishes specific revenue thresholds (among other criteria).

identify and access their programming content, as specified in the proposed new requirement set out in Appendix 3 to this notice.

27. For exempt terrestrial BDUs,¹⁰ to avoid imposing a significant regulatory burden on smaller services and for regulatory consistency, the Commission will consider:

- whether any new requirement should apply to services with more than 2,000 subscribers; and
- if so, whether it should also apply to services with 2,000 or fewer subscribers that are affiliated with¹¹ any BDUs with more than 2,000 subscribers.

Q8. What are the impacts, challenges or opportunities that may result from the proposed new requirement set out in Appendix 3 to this notice? What are the impacts, challenges or opportunities that may result from also applying this requirement to exempt terrestrial BDUs with 2,000 or fewer subscribers that are affiliated with an undertaking serving more than 2,000 subscribers? Please explain.

Q9. Should the Commission set different thresholds for which exempt terrestrial BDUs would have to adhere to the proposed new requirement? If so, what thresholds would be appropriate? Please explain.

Q10. Should the Commission make any changes to the proposed addition to the exemption order under which these services operate? Please explain.

Q11. Should any new requirement come into effect by 16 October 2026? Please explain.

Possible new requirement for other services

28. The Commission invites comments on whether any other broadcasting service should be required to make available equipment, software or other technology that allows persons with disabilities to identify and have access to its programming services, including programs with described video.

Q12. Are there any impacts, challenges or opportunities that may result from the Commission requiring any other broadcasting service to ensure that any individual who is blind or partially sighted or who has fine motor skills disabilities can independently identify and access that service's programming? If

¹⁰ These services operate pursuant to the exemption order (Broadcasting Order 2017-320) set out in the appendix to Broadcasting Regulatory Policy 2017-319. That order distinguishes between services with 2,000 (or fewer) subscribers and services with more than 2,000 subscribers.

¹¹ In this context, "affiliated with" would mean in control of the smaller exempt BDU, controlled by the smaller exempt BDU or controlled by the same person as the smaller exempt BDU.

so, specify the service(s), whether any thresholds should be applied, and when any such requirement should be put into place. Please explain.

What you need to know to participate in this proceeding

Procedure

29. The [*Canadian Radio-television and Telecommunications Commission Rules of Practice and Procedure*](#) (Rules of Procedure) apply to this proceeding. The Guidelines on the CRTC Rules of Practice and Procedure (Broadcasting and Telecom Information Bulletin 2010-959) are meant to help members of the public understand the Rules of Procedure so that they can more effectively participate in Commission proceedings.
30. For information on accessibility and accommodations in Commission proceedings, please see Broadcasting and Telecom Information Bulletin 2025-95.

Submitting an intervention

31. The Commission invites comments that address the issues and questions set out above. The Commission will accept comments that it receives on or before **15 December 2025**.
32. The Commission invites individuals who are Deaf or hard of hearing and their representatives to present their comments on the issues under consideration in American Sign Language (ASL) and Langue des signes québécoise (LSQ) in video format if they so choose. Parties filing video comments must provide a working link to their video in the Intervention form. As these videos will inform the Commission's decision-making, they must be publicly accessible. For instance, a link that requires another party to request access to the video would not meet this standard.
33. The Commission will transcribe the ASL and LSQ interventions filed for this proceeding and the transcripts will be posted on the Commission's website to facilitate the reply comments process for all interveners.
34. For videos longer than 15 minutes, a brief summary should be provided at the beginning of the video.
35. Any party can request accommodations to participate in this Commission proceeding. This could be related to disability, or to other reasons, like religious observance, or to a combination of reasons. If you wish to request accommodations in filing your comments, you are encouraged to make your request **within the first 15 days** after this notice of consultation is posted on the Commission's website.
36. Parties who require assistance submitting comments can contact the Commission's Hearings & Public Proceedings group at hearing@crtc.gc.ca.

37. Interested persons who file an intervention automatically become a party to this proceeding. All persons carrying on undertakings that may be affected by the changes proposed in this notice are made parties to this proceeding, including all licensed broadcasting distribution undertakings, all registered online undertakings and all broadcasting distribution undertakings currently operating under the exemption order set out in Broadcasting Order 2017-320. Only parties to the proceeding can participate in further stages of the proceeding.
38. Submissions must be filed by sending them to the Secretary General of the Commission using only one of the following means:
- completing the Commission's [intervention form](#);
 - sending a fax to the Commission at 819-994-0218; or
 - writing to the Commission by mail to CRTC, Gatineau, Quebec K1A 0N2.
39. Submissions longer than five pages should include a summary. Submissions will be posted in the official language and format in which they are received.
40. The deadline to submit an intervention to the Commission is 5 p.m. Vancouver time (8 p.m. Gatineau time). Parties are responsible for ensuring the timely delivery of their submissions and will not be notified if their submissions are received after the deadline. Late submissions will not be considered by the Commission and will not be made part of the public record.
41. The Commission requests that, whenever possible, parties provide evidence in support of their comments or proposals. The questions in this notice are numbered, and the Commission asks that parties identify the number for each of the questions to which they are responding. In addition, the Commission may ask parties to respond to additional questions. These questions and the responses will be placed on the public record.
42. Interested persons are permitted to coordinate, organize, and file, in a single submission, interventions by other interested persons who share their position but do not wish to appear at the hearing. Information on how to file this type of submission, known as a joint supporting intervention, as well as a template for the covering letter to be filed by the parties, can be found in Broadcasting Information Bulletin 2010-28-1.

Submitting replies

43. Parties can file replies with the Commission by **2 February 2026**. Their replies can address any matters on the record of the proceeding.

Privacy notice

44. Please note the following:

- Documents will be posted on the Commission's website exactly as received. This includes any personal information contained in them, such as full names, email addresses, postal/street addresses, and telephone and fax numbers. Links to ASL or LSQ video submissions and the transcripts of these videos will also be put on the Commission's website.
- All personal information parties provide as part of this public process, except information designated as confidential, will be posted on the Commission's website and can be accessed by others.
- However, the information parties provide can only be accessed from the web page of this particular public process. As a result, a general search of the Commission's website using either its search engine or a third-party search engine will not provide access to the information that was provided as part of this public process.
- The personal information that parties provide will be used and may be disclosed for the purpose for which the information was obtained or compiled by the Commission or for a use consistent with that purpose.

Confidentiality

45. The Commission's proceedings are designed to allow members of the public to provide input so that it can make better, more-informed decisions. As a result, the general rule is that all information filed with the Commission is placed on the public record and can be reviewed by all parties and members of the public.

46. However, the Commission also often needs detailed information from the companies it regulates and supervises to make an informed decision. This information can be commercially sensitive, especially as the environment in which the companies operate becomes more competitive. The Commission will therefore accept certain information as confidential.

47. Parties can request that information be filed in confidence under section 25.3(1) of the Act with a detailed rationale as to why that information should be considered confidential. The Commission reminds parties that make such a request that when a document is filed with confidential information, an abridged version must also be filed so that it can be included in the public record.

Accessible formats for persons with disabilities

48. The Commission requires regulated entities and encourages all parties to file submissions in accessible formats (for example, text-based file formats that enable text to be enlarged or modified or read by screen readers) for this proceeding. To help

in this regard, the Commission has posted on its website [guidelines](#) for preparing documents in accessible formats.

49. If submitted documents have not been filed in accessible formats, you can contact the Commission's Hearings & Public Proceedings group at hearing@crtc.gc.ca to request that Commission staff obtain those documents in accessible formats from the party that originally submitted the documents in question.

Accessing documents

50. Links to interventions, as well as other documents referred to in this notice, are available on the Commission's "[Consultations and hearings: have your say](#)" page.

51. Documents are available upon request during normal business hours by contacting:

Documentation Centre
Examinationroom@crtc.gc.ca
Tel.: 819-997-4389
Fax: 819-994-0218

Client Services
Toll-free telephone: 1-877-249-2782
Toll-free TTY: 1-877-909-2782

52. Interested persons can find electronic versions of the documents by clicking on "[\[Submit an intervention or view related documents\]](#)" at the top of this notice.

Secretary General

Related documents

- *Complaint against Bell Canada and Bell Media Inc. – Barriers to accessibility when accessing programming via set-top boxes and other devices*, Broadcasting Decision CRTC 2025-271, 16 October 2025
- *Accessibility and accommodations guidelines*, Broadcasting and Telecom Information Bulletin CRTC 2025-95, 14 May 2025
- *Online Undertakings Registration Regulations* and exemption order regarding those regulations, Broadcasting Regulatory Policy CRTC 2023-329 and Broadcasting Order CRTC 2023-330, 29 September 2023
- *Revised exemption order for terrestrial broadcasting distribution undertakings serving fewer than 20,000 subscribers*, Broadcasting Regulatory Policy CRTC 2017-319 and Broadcasting Order CRTC 2017-320, 31 August 2017
- *Guidelines on the CRTC Rules of Practice and Procedure*, Broadcasting and Telecom Information Bulletin CRTC 2010-959, 23 December 2010

- *Changes to certain practices for filing interventions – Expansion of filing practices to include the filing of joint supporting comments for broadcasting policy proceedings*, Broadcasting Information Bulletin CRTC 2010-28-1, 10 December 2010

Appendix 1 to Broadcasting Notice of Consultation CRTC 2025-272

Regulations amending the Broadcasting Distribution Regulations

Amendment

1 Section 7.3 of the *Broadcasting Distribution Regulations*¹² is replaced by the following:

7.3 Except as otherwise provided by an order made under subsection 9.1(1) of the Act in respect of its distribution undertaking, a licensee shall make available to its subscribers equipment, software or other technology that allows any individual who is blind or partially sighted or who has fine motor skills disabilities to identify and have access to its programming services, including programs with described video.

Coming into Force

2 These Regulations come into force on the day on which they are registered.

¹² SOR/97-555

Appendix 2 to Broadcasting Notice of Consultation CRTC 2025-272

Proposed condition of service for certain online undertakings

Pursuant to subsection 9.1(1) of the *Broadcasting Act*, the Commission proposes to make an order imposing the following condition of service on the operators of online undertakings subject to the requirements of the *Online Undertakings Registration Regulations*.

Condition of service

1. Except as otherwise authorized by the Commission, the operator shall, by **16 October 2026**, make available to its subscribers equipment, software or other technology that allows any individual who is blind or partially sighted or who has fine motor skills disabilities to identify and have access to its programming services, including programs with described video.

Definition

For the purposes of this condition of service, “operator” means a person that carries on a broadcasting undertaking to which the *Broadcasting Act* applies.

Appendix 3 to Broadcasting Notice of Consultation CRTC 2025-272

Proposed condition for certain exempt terrestrial broadcasting distribution services

Pursuant to subsection 9(4) of the *Broadcasting Act*, the Commission proposes to amend the exemption order under which certain exempt terrestrial broadcasting distribution services operate,¹³ specifically, by inserting the paragraph below in that exemption order.

Accessibility of programming

29. If the undertaking serves more than 2,000 subscribers, it shall make available to its subscribers equipment, software or other technology that allows any individual who is blind or partially sighted or who has fine motor skills disabilities to identify and have access to its programming services, including programs with described video, by no later than **16 October 2026**.

¹³ These services currently operate pursuant to the exemption order set out in the appendix to *Revised exemption order for terrestrial broadcasting distribution undertakings serving fewer than 20,000 subscribers*, Broadcasting Regulatory Policy CRTC 2017-319 and Broadcasting Order CRTC 2017-320, 31 August 2017.