CBC Radio-Canada

2 February 2026 Filed via Intervention Comment Form

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

Re: Broadcasting Notice of Consultation CRTC 2025-272
Call for comments – Removing barriers to identifying and accessing programming

Dear Marc Morin,

1. CBC/Radio-Canada ("the Corporation") is pleased to submit reply comments in the consultation on Removing barriers to identifying and accessing programming.

I) Scope of the Proposed Requirements

2. The Commission is proposing to amend section 7.3 of the Broadcasting Distribution Regulations to remove the existing exception for unavailable or incompatible technology and to require BDUs to make available the equipment, software or other technology necessary to enable individuals who are blind, partially sighted, or who have fine motor disabilities to identify and access programming services, including programs with described video.[1]

3. The Commission is also proposing a new condition of service requiring online undertakings to provide comparable accessibility technology by 16 October 2026, and to amend the exemption order for terrestrial BDUs serving fewer than 20,000 subscribers so that those serving more than 2,000 subscribers would be subject to the same requirement by that date.[2]

4. The Corporation supports the Commission's efforts to enhance accessibility within the Canadian broadcasting system for persons with disabilities. We note that user groups have highlighted the need for user interfaces to be compatible with screen readers and voice or remote controls.

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[1] Broadcasting Notice of Consultation CRTC 2025-272, para. 10.
[2] *Ibid.*, para 14.

They also seek labeled and identifiable access to described video, customizable captions, and searchable features for accessible content.[3]

5. In its Notice, the Commission has also invited 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.[4] For the reasons set out below, CBC/Radio-Canada agrees with Intervenors that the Commission's proposed new requirements should only apply to traditional broadcasting distribution undertakings ("BDUs") and to online BDUs, namely online undertakings that offer third-party programming services and serve as the direct interface with the audience. These requirements should not be extended to other online streaming undertakings, as these services are not distribution platforms and lack control over the distribution hardware.

II) Limits on Hardware and Consumer Equipment

6. The Corporation supports the position raised by several stakeholders regarding the practical reach of the proposed regulations. In particular, we agree that it remains unclear how the proposed obligations would apply to services that do not provide the means by which users access programming online.[5] We share the view that online streaming undertakings function differently than traditional distributors. As Corus noted, these services lack a 'material connection'[6] to distribution platforms, relying instead on third-party infrastructure to deliver their services.

7. For instance, CBC/Radio-Canada operates "online undertakings" as defined in subsection 2(1) of the *Broadcasting Act*, including CBC Gem, ICI TOU.TV, and various FAST channels. These online undertakings do not provide consumer hardware, nor do they control the proprietary accessibility features built into Smart TVs, set-top boxes, remote controls, laptops, mobile devices, and tablets. As such, obligations regarding hardware and consumer equipment should reside with the entities that manage those specific access points.

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[3] See examples, Interventions by CDGM at para 4, page 2; CNIB at para 34, page 9; DWCC at para 15, page 3; AEBC at para 26, page 8.
[4] *Supra* note 1, para. 28.
[5] Cable Public Affairs Channel Inc., Intervention at para 4, page 2.
[6] Corus Entertainment Inc., Intervention at para 4, page 2.

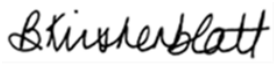
8. Furthermore, given that online services have limited control over the technology and user interfaces involved, the Corporation agrees with Intervenors who have proposed narrowing the scope of the proposed order. Specifically, CBC/Radio-Canada supports Independent Broadcast Group's ("IBG") proposal to tailor the requirements to apply only to those online services that exercise direct control over the hardware or software interfaces used by consumers to access programming[7] as these entities are the ones positioned to implement the required technology.

III) Conclusion

9. CBC/Radio-Canada collaborates with user groups and industry partners to provide content that is inclusive and accessible to all Canadians.

10. We appreciate this opportunity to submit these reply comments in this important proceeding.

Sincerely,



Bev Kirshenblatt
Executive Director, Corporate & Regulatory Affairs

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[7] IBG, Intervention, page 2.