

Canadian Radio-television and Telecommunications Commission

Ottawa, Canada K1A 0N2

Ottawa, 27 April, 2022

Our reference: 1011-NOC2020-0124 and 1011-NOC2021-0069

BY EMAIL

TO: Distribution list

Guidance for notifying the Canadian Radio-television and Telecommunications Commission (CRTC) when you publish documents required under the Accessible Canada Act (ACA) and the CRTC Accessibility Planning and Reporting Regulations¹ (the Regulations).

Dear Service Provider:

We are writing to provide guidance on how to notify the CRTC when you publish each version of your feedback process description, accessibility plans and progress reports required under the ACA and the Regulations.

The first relevant deadline under the Regulations is 1 June 2022, by which date the largest broadcasting and telecom entities will have to publish their feedback process descriptions.

As you may be aware, you must notify the Commission within **48 hours** of publishing each version of a feedback process description, accessibility plan or progress report on your website, and include in your notice **a hyperlink to the URL**.²

Please use **My CRTC Account (GCKey)** to submit your notice to the CRTC. Also, please use the format provided below to fill out the **Description of Information** field in your notice. Consistency of format enables efficiency and discoverability that benefits all stakeholders, given the volume of ACA submissions to the Commission anticipated over time.

Using GCKey to submit your notice to the Commission

Most broadcasting and telecommunications service providers who interact regularly with the CRTC are familiar with GCKey as the means for making submissions.

However, new service providers may need to set up an account, and instructions for this are provided when you access <u>the cover page of GCKey</u>.



¹ <u>SOR/2021-160</u>. Announced in Telecom and Broadcasting Regulatory Policy <u>CRTC 2021-215</u>, The Canadian Radio-television and Telecommunications Commission Accessibility Reporting Regulations, 7 July 2021.

² See: sections 7, 12, 17, 22, 28, and 33 of the Regulations.

Click <u>here</u> to access the cover page (Forms and My CRTC Account). Click on the **Broadcasting Cover Page** or **Telecom Cover Page** as applicable, log in to your GCKey account, and enter the relevant information for your organization (name, address, etc.) as necessary.

Format for description of information

You must then select the **relevant type of submission** from the menu provided. In this instance, you should be selecting **Other document(s)**.

In the **Submission** screen that follows, use the **Description of Information Submitted:** (required) field to enter your information in the below format.

| ACA <document Name></document | <entity name=""></entity> | <date></date> | Version <#> | Amended <#, Date> |
|---|---------------------------|---------------|-------------|----------------------|
|---|---------------------------|---------------|-------------|----------------------|

Legend:

- 1. ACA <document name> would be one of the following as appropriate to your notice:
 - ACA, Feedback process description,
 - ACA, Initial accessibility plan,
 - ACA, First progress report,
 - ACA, Second progress report, or
 - ACA, Updated accessibility plan.
- 2. **<Entity Name>** is the name of your organization. Please include the legal name of the entity and, if different, the business or brand name used to market services to the public. In this instance, the format would be **<Legal Name** (Brand Name)**>**.
- 3. **<Date>** is the due date (deadline) of the plan or report as established by the Regulations. The format for the date should be YYYY-MM-DD.
- 4. **Version <#>** is the version of the plan or report starting with "1." Increment as necessary (2, 3, 4, etc.) for subsequent versions.
- 5. **Amended <#, Date>** is an optional field for future use in specific circumstances when the Commission requests amendment of a specific version of a plan or report. Use "1" to identify the first amendment and increment as necessary (2, 3, 4, etc.) for subsequent amendments. The format for the date should be YYYY-MM-DD.

Entities that offer both broadcasting and telecommunications services

Entities that offer both broadcasting and telecommunications services may have chosen to address both of these in a consolidated single submission.

In this case, we ask that you submit the same information in GCKey using both **Broadcast Cover Page** and the **Telecom Cover Page**. Having this information in both places will help with downstream processing, clarity, and discoverability. It would also be helpful if you mention that this is the case in your notice.

The Accessible Canada Regulations

Note that the Regulations apply to areas within the Commission's purview. You may have additional obligations to notify the Accessibility Commissioner under the <u>Accessible Canada</u> <u>Regulations (justice.gc.ca)</u> when you publish each version or amendment of any accessibility plan or progress report and feedback process. Any such obligations would not be enforced by the Commission.³

If you have any questions, please feel free to contact Jennifer Porteous, Manager Social and Consumer Policy at engagement@crtc.gc.ca. Please continue to monitor the CRTC's website as more information will be coming.

Commission staff is sending this letter to help you understand your obligations, and is written in a less formal way than the Regulations. It is meant to complement the Regulations, not replace or override them. If anything in this letter conflicts with the ACA or the Regulations, they must take precedence. Nothing in this letter should be considered legal advice, and you are responsible for ensuring your compliance with the ACA and the Regulations. You are encouraged to read the Regulations and the associated Commission policy via the above links.

Sincerely,

Nanao Kachi Director, Social and Consumer Policy

³ Employment and Social Development Canada (ESDC) created complementary regulations under the ACA, namely the <u>Accessible Canada Regulations SOR/2021-241</u>. The Accessibility Commissioner, a member of the Canadian Human Rights Commission, will have authority for administering the Accessible Canada Regulations, SOR/2021-241, which also apply to broadcasting and telecommunications entities for areas outside of the purview of the Commission, e.g., employment, built environment, and transportation. For more information on the Accessible Canada Regulations, you may wish to consult the <u>website</u> of Employment and Social Development Canada.