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BEGIN PRODUCER’S NOTE:

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April 24, 2019

Standing Senate Committee Social Affairs, Science and Technology

The Senate of Canada,

Chambers Building, Room 1051

Ottawa, Ontario, Canada, K1A 0A4

# Re: Bill C-81: Accessible Canada Act - ASL and LSQ Recognition

The Executive of the Deaf Wireless Canada Consultative Committee - Comité consultatif sur les Services Sans fil des Sourds du Canada (**DWCC-CSSSC**) is writing on behalf of its 26 ASL & LSQ users/members residing in eight provinces. DWCC is concerned that the momentous and historical Bill C-81, the Accessible Canada Act, will ensure Canada is accessible to all persons with disabilities except Deaf people of Canada who use ASL and LSQ. This group faces communication barriers and challenges gaining access to information on a daily basis.

# About DWCC-CSSSC

By means of an introduction, DWCC is a standing committee of the Canadian Association of the Deaf-L’Association des Sourds du Canada (**CAD-ASC**) and is a group of Deaf, Deaf-Blind, and Hard of Hearing (**DDBHH**) consultants, analysts and committee volunteers across Canada.

**DWCC-CSSSC**’s mandate is to advocate for accessible wireless communications equality for DDBHH Canadians including but not limited to:

1. Affordable and accessible wireless data plans for ASL and LSQ users for two-way video calls.
2. Accessible industry-wide promotions of wireless services and products.
3. Removal of disparities in costs of the same accessible wireless products and services within each company.
4. Provision of functional equivalent wireless products and services including wireless applications (apps).
5. Accessible wireless emergency services (including emergency alerts and direct text to 911).
6. Nationwide public awareness, education and outreach on current accessible wireless and mobile communication products and services.

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We originate from and represent consumers from the 357,000 culturally Deaf who use ASL or LSQ, 3.21 million of Hard of Hearing Canadians (CAD-ASC) FOOTNOTE 1, and/or 69,700 Deaf-Blind Canadians (National Deaf-Blind Month/Junefest FOOTNOTE 2).

BEGIN FOOTNOTES:

1 Statistics on Deaf Canadians: <http://cad.ca/issues-positions/statistics-on-deaf-canadians/>

2 Statistics on Deaf-Blind Canadians: <http://junefest.ca/info/>

END FOOTNOTES.

DWCC is pleased to see Bill C-81 reach the Senate of Canada. Even after countless efforts by CAD-ASC and volunteers to have American Sign Language (**ASL**) and Langue des Signes Québécoise (**LSQ**) recognized as the languages of Deaf people of Canada, Bill C-81, pass the House of Commons **without ever mentioning our languages.**

Bill C-81 must be amended to explicitly include this recognition so that DDBHH Canadians may benefit from Bill C-81 at par with any other people with disabilities in Canada.

How would such recognition benefit DWCC members who participate in federal government activities - as in interacting with the Canadian Radio-television Telecommunications Commission (**CRTC**)? This recognition would enable these members (and by extension all DDBHH in Canada) to receive information, communication, and services from the federal government in ASL / LSQ.

Since 2015, DWCC members participated in at least eleven CRTC proceedings focusing on telecommunications accessibility for DDBHH Canadians. DWCC panelists appeared at the public hearings shared and discussed the lived experiences as DDBHH telecommunication consumers four times. DWCC conducted and gathered empirical qualitative and quantitative surveys in and submitted seven survey analysis reports sharing the telecommunications experiences of DDBHH Canadians. Links to these reports are listed in *Appendix A* FOOTNOTE 3 for your convenience. As a result of participating in all of the proceedings, DWCC made at least 99 recommendations describing how functional equivalency for these consumers may be achieved - in other words, how DDBHH consumers may use wireless services on an equal footing with their hearing peers. However, their participation in these proceedings has unfortunately **not** been barrier-free.

BEGIN FOOTNOTE 3:

3 Appendix A: Bookmark jump link: https://docs.google.com/

END FOOTNOTE 3.

# Barriers faced by DWCC-CSSSC members

Certain barriers continue to this day preventing DWCC-CSSSC members from participating in federal public hearings on an equal footing with their hearing counterparts.

# Information:

CRTC proceedings are released only in English and French - not in ASL / LSQ and that in and of itself poses a language barrier to DDBHH Canadians. ASL is distinct from English

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with its own grammar, syntax and idiomatic expressions. The same concept also applies to French / LSQ. DDBHH ASL / LSQ users, therefore, cannot follow or participate in these vital CRTC proceedings and inform CRTC how the telecommunication industry may better serve them as DDBHH consumers.

ASL and LSQ recognition in Bill C-81 would put in motion a requirement for ASL and LSQ videos of Key Information about released Notice of Consultations for telecom proceedings to allow groups such as DWCC to participate.

# Communication:

CRTC typically holds public proceeding hearings for five business days – open to everyone and anyone. Simultaneous English / French interpretation is provided throughout the whole public hearing. CRTC traditionally provided English / ASL interpreters and **CART** (Communication Access Real-time Translation) only for the half day when DDBHH panelists made their presentations in ASL. DDBHH panelists, therefore, were forced to miss all subsequent presentations. Members of the public were free to come and go anytime and anywhere during those five days of the public hearing.

CRTC traditionally expected DDBHH Canadians to follow a typical day in a public hearing by depending on English / French transcripts made available the next day. Problems with this practice include:

* The transcripts do not capture the emotional context behind the words spoken during the public hearing. DDBHH therefore missed this vital information when preparing subsequent documents (as in “final submissions”) for consideration by CRTC.
* The transcripts do not allow DDBHH Canadians to “hear” the evidence presented at the public hearings at the same time as their hearing peers.
* The transcripts do not allow DDBHH Canadians to informally approach other panelists to exchange information or opinions as their hearing counterparts do.
* The transcripts do not allow members of the public to approach DDBHH panelists with their feedback on the information DDBHH panelists brought forward to CRTC.
* The transcripts do not allow DDBHH panelists to track (and respond) in real time how other subsequent panelists reacted to the information they themselves brought forward earlier.
* Even the disseminated videos produced by the CPAC of the participating parties in CRTC proceedings are not available in ASL / LSQ – the languages used by many DDBHH, nor are closed-captioned.

Enshrining recognition of ASL / LSQ in Bill C-81 as the languages of Deaf people in Canada will resolve all the issues described above and will permit DDBHH Canadians to fully participate in CRTC public hearings on an equal footing with their hearing peers when

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appropriate and of ASL and LSQ interpreters and CART are requested some time in advance.

# Services:

Members of the public may directly contact CRTC in English or French with questions, comments or complaints. CRTC does not have staff fluent in either ASL or LSQ to receive similar calls from DDBHH Canadians. In contrast and since 2001, DDBHH Americans have been contacting the Disability Rights Office (**DRO** FOOTNOTE 4) of the Federal Communications Commission (**FCC** FOOTNOTE 5) in the United States should they wish to express their telecommunication concerns or opinions in ASL.

BEGIN FOOTNOTES:

4 FCC’s Disability Rights Office <https://www.fcc.gov/accessibility>

5 Federal Communications Commission (FCC): <https://www.fcc.gov/>

END FOOTNOTES.

These service-related issues would be resolved once Bill C-81 is amended to recognize ASL and LSQ as the languages of Deaf people in Canada.

# BACKGROUND RATIONALES

DWCC-CSSSC now describes and elaborates on fivelaws or court decisions to demonstrate why a mandatory Bill C-81 amendment must be made before Royal Assent.

# Canadian Charter of Rights and Freedoms

Firstly, the Constitutional Act, the *Canadian Charter of Rights and Freedoms,* established in 1982 FOOTNOTE 6 reads in part as:

BEGIN FOOTNOTE 6:

6 Constitution Act 1982: <https://laws-lois.justice.gc.ca/eng/const/page-15.html>

END FOOTNOTE 6.

# Interpreter

**14.** A party or witness in any proceedings who does not understand or speak the language in which the proceedings are conducted or who is deaf has the right to the assistance of an interpreter.

# Equality Rights

Section 15(1) clearly explicitly and implicitly establishes equality before and under the law and equal protection and benefit of law as shown below:

* 1. Every individual is equal before and under the law and has the right to the equal protection and equal benefit of the law without discrimination and, in particular, without discrimination based on race, national or ethnic origin, colour, religion, sex, age or mental or physical disability. FOOTNOTE 7

BEGIN FOOTNOTE 7:

7 Constitution Act: Canadian Charter of Rights and Freedoms: <https://laws-lois.justice.gc.ca/eng/const/page-15.html>

END FOOTNOTE 7.

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The Charter mentions Deaf people and every resident of Canada having the right to accessibility and equality without discrimination. Translation: The Charter enshrines Deaf people’s right to participate in Canadian society at equal footing with their hearing counterparts.

# Canadian Association of the Deaf v. Canada

Secondly, the Canadian Association of the Deaf v. Canada, [2007] decision sees the judge stating:

"*As Canadians, deaf persons are entitled to be full participants in the democratic process and functioning of government," Judge Richard Mosely wrote. "It is fundamental to an inclusive society that those with disabilities be accommodated when interacting with the institutions of government.*" (The Federal Court Decision FOOTNOTE 8)

BEGIN FOOTNOTE 8:

8 Federal Court Decisions - 2006: Canadian Association of the Deaf v. Canada: <https://decisions.fct-cf.gc.ca/fc-cf/decisions/en/item/52788/index.do>

END FOOTNOTE 8.

The case decision reads as:

* + 1. *Accordingly, I will issue a declaration that professional sign language interpretation services are to be provided and paid for by the Government of Canada, upon request, where a deaf or hard-of-hearing person participates in programs administered by the Government of Canada and the nature of communication with the person requires such services. This last limitation is intended to recognize that many communications between the government and members of the public will take place in writing or through other means that do not require oral communication.*
    2. *Further, I will declare that where the Government of Canada engages in public or private consultations with non-governmental organizations in the development of policy and programs in which the deaf and hard-of-hearing Canadians have identifiable interests and the nature of communications requires such services, visual interpretation services are to be provided and paid for by the Government of Canada to allow the meaningful participation of organizations representing the deaf and hard-of-hearing communities.*
    3. *It should be recognized that meaningful participation may be achieved through means other than visual interpretation services, such as in writing or through electronic media.*

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JUDGMENT

THIS COURT HEREBY ORDERS AND ADJUDGES that:

1. *Professional sign language interpretation services are to be provided and paid for by the Government of Canada, upon request, where a deaf or hard-of-hearing person receives services from or participates in programs administered by the Government of Canada and the nature of communication between the government and the person requires such services;*
2. *Where the Government of Canada engages in public or private consultations with non‑governmental organizations in the development of policy and programs in which the deaf and hard-of-hearing Canadians have identifiable interests and the nature of communications requires such services, visual interpretation services are to be provided and paid for by the Government of Canada to allow the meaningful participation of organizations representing the deaf and hard-of-hearing communities*; FOOTNOTE 9

BEGIN FOOTNOTE 9:

9 Canadian Assn. of the Deaf v. Canada, [2007] 2 FCR 323, 2006 FC 971 (CanLII): <https://www.canlii.org/en/ca/fct/doc/2006/2006fc971/2006fc971.html>

END FOOTNOTE 9.

Therefore federal government departments and agencies must ensure that consultations with the deaf and hard-of-hearing community, including face to face meetings, are not precluded by the failure to plan and budget for interpretation services where they are necessary to allow access to consultation processes.

**Eldridge v British Columbia (Attorney General)**

Thirdly, ***Eldridge v British Columbia (Attorney General)***, [[1997] 3 SCR 624](https://en.wikipedia.org/wiki/Case_citation#Canada), is a leading decision by the [Supreme Court of Canada](https://en.wikipedia.org/wiki/Supreme_Court_of_Canada) that expanded the application of the [*Canadian*](https://en.wikipedia.org/wiki/Canadian_Charter_of_Rights_and_Freedoms)[*Charter of Rights and Freedoms*](https://en.wikipedia.org/wiki/Canadian_Charter_of_Rights_and_Freedoms) under [section 32](https://en.wikipedia.org/wiki/Section_Thirty-two_of_the_Canadian_Charter_of_Rights_and_Freedoms) of the *Charter* FOOTNOTE 10. Parts of the decision reads as:

BEGIN FOOTNOTE 10:

10 Judgements of the Supreme Court of Canada:

<https://scc-csc.lexum.com/scc-csc/scc-csc/en/item/1552/index.do>

END FOOTNOTE 10.

“The appellants, Robin Eldridge and John and Linda Warren, are deaf and prefer to communicate through sign language. After a not-for-profit agency stopped providing free medical interpretation in 1990, they were unable to receive a similar service from the government. Without interpretation, they had difficulty communicating with their doctors, increasing their risk of misdiagnosis and ineffective treatment. Neither the Hospital Insurance Act nor the Medical and Health Care Services Act in British Columbia provided funding for sign language interpretation for the deaf. The appellants sought a declaration that the failure to provide sign language interpreters constituted discrimination on the basis of physical disability, and therefore violated

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the appellants’ equality rights under s. 15(1) of the Canadian Charter of Rights and Freedoms.

The Supreme Court of Canada (SCC) held that once a government undertakes to provide a benefit to the general population, it is required by s. 15(1) to ensure that disadvantaged members of society listed in s. 15(1) have the resources to take full advantage of that benefit. The SCC ruled that the appellants’ equality rights had been violated and the infringement could not be justified under s. 1 of the Charter.” FOOTNOTE 11

BEGIN FOOTNOTE 11:

11 Ontario Justice Education Network (OJEN):

<http://ojen.ca/en/resource/landmark-case-eldridge-v-british-columbia-attorney-general>

END FOOTNOTE 11.

In summary, the appellants contended that the absence of interpreters impaired their ability to communicate with their doctors and other health care providers, and thus increased the risk of misdiagnosis and ineffective treatment. The Supreme Court of Canada ruled that "sign language" interpreters must be provided in the delivery of medical services where doing so is necessary to ensure effective communication. FOOTNOTE 12

BEGIN FOOTNOTE 12:

12 Eldridge v. British Columbia: <https://en.wikipedia.org/wiki/Eldridge_v_British_Columbia_(AG)>

END FOOTNOTE 12.

The Eldridge case obligates governments and quasi governmental bodies to provide interpreting services when interacting with Deaf and hard of hearing people in Canada.

# United Nations (UN) Convention on the Rights of Persons with Disabilities (CRPD)

Fourthly, Canada ratified the UN Convention on the Rights of Persons with Disabilities (UNCRPD) in March 2010 and acceded to the Optional Protocol of the UNCRPD in December 2018 FOOTNOTE 13, Canadians will consequently have additional recourse to make a complaint to the UN Committee on the Rights of Persons with Disabilities, if they believe their rights under the Convention have been violated.

BEGIN FOOTNOTE 13:

13 Canada Acceedes to the Optional Protocol to the UN CRPD:

[https://www.canada.ca/en/employment-social-development/news/2019/01/canadaaccedes-to-the-optional-pro](https://www.canada.ca/en/employment-social-development/news/2019/01/canadaaccedes-to-the-optional-protocol-to-the-united-nations-convention-on-the-rights-of-persons-with-disabilities.html) [tocol-to-the-united-nations-convention-on-the-rights-of-persons-with-disabilities.html](https://www.canada.ca/en/employment-social-development/news/2019/01/canadaaccedes-to-the-optional-protocol-to-the-united-nations-convention-on-the-rights-of-persons-with-disabilities.html)

END FOOTNOTE 13.

CRPD **Article 2** puts spoken and sign languages on equal footing. CRPD **Article 21** expects nations to allow their DDBHH citizens “*to seek, receive and impart information and ideas on an equal footing*“ with their hearing counterparts.

As a signatory to the UN CRPD, Canada is obligated to adhere to the Convention and one significant mechanism to fulfill its obligation is by enshrining in Bill C-81 recognition of sign languages as the languages of Deaf people in Canada.

# UN CRPD Concluding Observations in the Initial Report of Canada

Fifthly, the *UN CRPD Concluding Observations on the Initial Report of Canada* FOOTNOTE 14 recommended that Canada:

BEGIN FOOTNOTE 14:

14 UN CRPD Concluding Observations in the Initial Report of Canada:

<http://cad.ca/wp-content/uploads/2017/04/CRPD-Concluding-Observations-on-the-initial-report-of-Canada.pdf>

END FOOTNOTE 14.

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*“39. (a) Recognize, in consultation with organizations of deaf persons, American Sign Language and Quebec Sign Language (Langue des Signes Québécoise) as official languages...”*

Therefore the only way Canada could and will meet this recommendation is by enshrining in Bill C-81 recognition of sign languages as the languages of Deaf people in Canada

# Summary

Sections 14 and 15 of the Charter of Rights and Freedoms enshrine Deaf people's right to interpreters in courts and clearly states that Deaf people have the same rights as their hearing counterparts.

The Canadian Association of the Deaf v. Canada and Eldridge v British Columbia (Attorney General) court decisions both ruled Deaf people have the right to interpreting services when interacting with governmental or quasi governmental departments, agencies, bodies or representatives.

Articles 2 and 21 of the UN CRPD and paragraph 39(a) of the UN CRPD Concluding Observations in the Initial Report of Canada clearly obligates Canada to recognize sign languages of Deaf people in Canada.

The best and in fact the only way to interpret the Charter of Rights and Freedoms, satisfy two significant court decisions and meet international obligations is by enshrining in Bill C-81 of sign languages as the languages of Deaf people in Canada. Once that amendment is made, DDBHH in Canada will access information, communications, and services at the federal level on an equal footing with their hearing counterparts.

Bill C-81 was originally designed to break down barriers for Deaf people and persons with disabilities to ensure an accessible and inclusive country for everyone living in Canada but that definitely will not happen if the bill is missing recognition of ASL and LSQ as the languages of Deaf people in Canada.

# Recommendations:

As a caveat, DWCC-CSSSC does not have legal expertise or experience. DWCC is simply a consumer advocacy committee. DWCC’s suggested wording is to be taken and interpreted in its spirit and not “to the letter” DWCC respectfully refers the Senate SOCI committee to CAD-ASC’s upcoming presentation and related brief(s) for the exact specific “legalese” wording when amending Bill C-81.

With that caveat in mind, DWCC-CSSSC therefore has two recommendations as follows.

## Preamble

**The following paragraph or similar wording with equal or better legal effect:**

Whereas UNCRPD, Article 2, Definition: “Language” includes spoken and signed languages...” as equal, Canada recognizes ASL and LSQ as the national sign

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languages of Deaf people in Canada and ensures their full accessibility for these Canadians’ equal participation in society.

be added after the following paragraph;

*Whereas Canada is a State Party to the United Nations Convention on the Rights of Persons with Disabilities and Canada has agreed to take appropriate measures respecting accessibility and to develop and monitor minimum accessibility standards;*

# Principles

**In the Principles section of Bill C-81, DWCC-CSSSC suggests that a new subsection 6(e) as follows be inserted between subsection (e) and (f)**

*(e) American Sign Language (ASL) and Langue des Signes Québécoise (LSQ) are recognized as the languages of Deaf people in Canada;*

And that subsections (e) and (f) be renumbered as (f) and (g) respectively.

# Conclusion

Amending Bill C-81 to recognize ASL and LSQ as languages of Deaf people in Canada will guarantee Deaf people will fully participate in all aspects of Canadian society and will have the same legal protections as their hearing counterparts. Such an amendment will fulfill Canada’s international obligations and satisfy the spirit and letter of legal decisions. After such recognition, Canada will proudly join 45+ countries ([WFD](https://www.facebook.com/Wfdeaf.org/posts/1276203495781848?__xts__%5b0%5d=68.ARCxBStjhvmuAhKaGUtbILOqfgpYa-HaQSwYuBVBa3_WpWP0NwWOgrtvtIGd5OXzvRsioKW2-4USdffKTF13_0-ySjxgBhNFg9fHzlLmI1amuQsnbZSHumDHyXC5ah_MEnIeKREKXWQQYR-tCNWa0xnT7gI3xDWHmeE09PoP0MphhA2jI5fXh-OazJkY6Neu1UQJCR_MY2HDXrPpBQ8yu1Bb7sUQlBf8ZnpmzDUulxwmj5Js-egkc3og9RRqFEIBRMl-WXM7ejR5VNYs6E8YeBdq7BCtfPJw7qTSAfhFHJ5q19jlKl1Rdsm3B8vqBi1xxZHpf4AijcBCWZ_43sjpMHJnn6f9hBAd&amp;__tn__=K-R)) who already afford such recognition to their own respective sign languages.

DWCC-CSSSC rightfully expects the Senate SOCI Committee not to leave Bill C-81 as is without the proper amendment(s) resulting in the exclusion of Deaf, Deaf-Blind and Hard of Hearing ASL and LSQ users in Canada.

Please do not hesitate to contact us at [regulatory@deafwireless.ca](mailto:regulatory@deafwireless.ca) should you have questions or require clarification.

Thank you,

Lisa Anderson-Kellett, Chair

Deaf Wireless Canada Consultative Committee (DWCC-CSSSC)

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## Appendix A

1. The DWCC produced 7 survey reports, some as joint organization submissions:
   1. TNC 2015-134 - [Deaf Wireless Survey Analysis](http://www.deafwireless.ca/wp-content/uploads/2016/05/Deaf-Wireless-Canada-Survey-Analysis-2016-REV02-APRIL-19-2016.pdf)
   2. TRP 2016-496 - [Follow-Up Report](http://www.deafwireless.ca/wp-content/uploads/2018/04/DWCC-CADASC-Response-TRP-2016-496-Accessibility-Reporting-FINAL.pdf)
   3. TNC 2016-116 - [Rede(a)fining Accessible 9-1-1: Saving Lives A Survey Analysis Report Examining Deaf Hard of Hearing and DeafBlind Issues](http://www.deafwireless.ca/wp-content/uploads/2017/01/RedeAfining-Accessible-9-1-1-Saving-Lives-Version2Feb202017-CADASCDWCCCNSDB.pdf)
   4. TNC 2017-33 - [Deaf, DeafBlind, Hard of Hearing TTY & IP Relay Services Survey Analysis](http://www.deafwireless.ca/wp-content/uploads/2017/07/DWCC-CADASC-CNSDB-TTY-IPRelay-Survey-Analysis-Report-27-June-2017_-FINAL.pdf)
   5. TNC 2018-98 - [Lower-cost data-only plans for mobile wireless services: A Deaf, Deaf-Blind and Hard of Hearing Canadian Perspective](http://www.deafwireless.ca/wp-content/uploads/2018/06/DWCC-et-al-TNC-2018-98-SURVEY-ANALYSIS-FULL-REPORT-12-June-2018.pdf)
   6. TNC 2018-246 - [Telecom Sales Experiences of Deaf, Deaf-Blind and Hard of Hearing Canadians](http://www.deafwireless.ca/wp-content/uploads/2018/10/DWCC-et-al-Report-for-DDBHH-Sales-Practises-Experiences-for-TNC-2018-246_ARIAL_FINAL.pdf)
   7. TNC 2018-422 - [An Accessible Internet Code for Deaf, Deaf-Blind and Hard of Hearing Canadians](http://www.deafwireless.ca/wp-content/uploads/2019/03/CAD-ASC-et-al-An-Accessible-Internet-Code-Survey-Analysis-TNC-2018-422_FINAL.pdf)
2. The DWCC participated in the following proceedings:
   1. TNC [2015-134](https://crtc.gc.ca/eng/archive/2015/2015-134.htm) - Review of basic telecommunications services
   2. TNC [2016-115](https://crtc.gc.ca/eng/archive/2016/2016-115.htm) - Participation by wireless service providers in the National Public Alerting System
   3. TNC [2016-116](https://crtc.gc.ca/eng/archive/2016/2016-116.htm) - Establishment of a regulatory framework for next-generation 9-1-1 in Canada
   4. TNC [2016-293](https://crtc.gc.ca/eng/archive/2016/2016-293.htm) - Review of the Wireless Code
   5. TNC [2017-33](https://crtc.gc.ca/eng/archive/2017/2017-33.htm) - Review of the regulatory framework for text-based message relay services
   6. TNC [2018-98](https://crtc.gc.ca/eng/archive/2018/2018-98.htm) - Lower-cost data-only plans for mobile wireless services
   7. TNC [2018-246](https://crtc.gc.ca/eng/archive/2018/2018-246.htm) - Report regarding the retail sales practices of Canada’s large telecommunications carriers
   8. TNC [2018-422](https://crtc.gc.ca/eng/archive/2018/2018-422.htm) - Call for comments – Proceeding to establish a mandatory code for Internet services

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