



**BCE**

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**Accessibility**

**Plan**

**2026 – 2029**

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# 1.0 General

## 1.1 Application

This Accessibility Plan has been prepared in accordance with the requirements of the Accessible Canada Act (S.C. 2019, c. 10) and its regulations (ACA). This Plan applies to BCE, as defined in the footnote below.<sup>1</sup>

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<sup>1</sup> BCE, along with the words "we", "us", "our" refer to the BCE group of companies and brands as they exist over time, as well as any successor companies as a result of corporate reorganizations or restructurings, to the extent that those companies and brands are subject to and not exempt from the requirements of the ACA (the entities referred together as "BCE"). Those companies and brands may include, but are not limited to: Bell Aliant, Bell Canada, Bell ExpressVu LP (Bell TV), Bell Media Inc., Bell Media Radio Atlantique Inc., Bell Media Regional Radio Partnership, Bell Media Studios Inc., Bell Mobility, Bell Technical Solutions Inc., Bell MTS, Bell Satellite TV, Bell Wholesale Services, Bell Wireless Alliance Services Inc., BCE Global, Bimcor Inc., BNN Bloomberg, Câblevision du Nord de Québec Inc., Crave, CTV Specialty Television Inc., CTV Specialty Sports Holding Inc., CTV Specialty Television Enterprises Inc., Distributel Communications

It builds on the progress made since our 2023-2026 Accessibility Plan and subsequent Progress Reports and follows the structure of the ACA.

## 1.2 Accessibility Statement

Accessibility is essential to how BCE connects people, communities, and businesses across Canada. As technology continues to evolve and customers' expectations and needs change, we will continue to keep accessibility at the core of how we design, build, and deliver our products and services.

This Accessibility Plan was shaped through consultations with persons with disabilities, including employees, customers, and community organizations. Their insights

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Limited, DMTS, EBOX Telecommunications Inc., Expertech, Groupe Maskatel Québec, iTel Networks Inc., KMTS, Le Réseau des Sports (RDS) Inc., Les Éditions Studio V Inc., Les Éditions Musicales L.M.S. Limitée, Lucky Mobile, Navigata Communications Limited, noovo info, noovo moi, noovo, NorthernTel, Northwestel Inc., Ontera, ORBYT Media, Primus, Réseau des sports (RDS), Solo Mobile, Télébec, The Sports Network Inc. (TSN), and Virgin Plus.

helped us identify where barriers persist and where meaningful improvements are needed. Our Accessibility Plan outlines the actions we will take to identify, remove, and prevent barriers, and reflects our ongoing effort to make our products, services, retail stores, and workplaces more inclusive for everyone.

### 1.3 Feedback

BCE appreciates the feedback we receive from customers, employees, and members of the public. This Plan reflects input gathered through our feedback process, summarized in our 2024 and 2025 Accessibility Progress Reports.

BCE has a process for receiving and responding to feedback, including feedback on how services are delivered to persons with disabilities.

Our Accessibility Plan and a description of our accessibility feedback process are available upon request in the following alternate formats: print, large print, braille, audio format, electronic format, or other agreed-upon formats.

You can submit your accessibility feedback (including feedback on this plan) or request an alternate format of

our Accessibility Plan or description of our feedback process in a number of ways, including by:

Completing an [online form](#)

Phone: 1 866 313-1092

TTY: 1 800 268-9242

Email: [accessible.feedback@bce.ca](mailto:accessible.feedback@bce.ca)

Regular mail: P. O. Box 8787 Downtown Station,  
Montréal, Québec H3C 4R5

Select Social Media Channels

For more information, visit [bce.ca/Accessibility](https://bce.ca/Accessibility)

The person responsible for receiving accessibility feedback at BCE is the Vice President, Customer Operations, Bell Canada.

Feedback can be provided anonymously. We acknowledge all feedback, except for anonymous submissions, in the same way it was submitted.

## 1.4 ACA Principles

This Accessibility Plan has been prepared in accordance with the principles set out in section 6 of the ACA, which are:

- (a) all persons must be treated with dignity regardless of their disabilities;
- (b) all persons must have the same opportunity to make for themselves the lives that they are able and wish to have regardless of their disabilities;
- (c) all persons must have barrier-free access to full and equal participation in society, regardless of their disabilities;
- (d) all persons must have meaningful options and be free to make their own choices, with support if they desire, regardless of their disabilities;
- (e) laws, policies, programs, services and structures must take into account the disabilities of persons, the different ways that persons interact with their environments and the multiple and intersecting forms of marginalization and discrimination faced by persons;
- (f) persons with disabilities must be involved in the development and design of laws, policies, programs, services and structures; and

- (g) the development and revision of accessibility standards and the making of regulations must be done with the objective of achieving the highest level of accessibility for persons with disabilities.

## **2.0 Areas Described Under Section 5 of the ACA**

The ACA outlines seven priority areas in which organizations must identify, remove, and prevent barriers. This Accessibility Plan addresses each of these areas:

- Employment
- The built environment
- Information and communication technologies (ICT)
- Communication, other than ICT
- The procurement of goods, services and facilities
- The design and delivery of programs and services
- Transportation

These priority areas form the backbone of our accessibility strategy and guide the commitments set out in this Accessibility Plan.

## 3.0 Consultations

Since publishing our 2023-2026 Accessibility Plan, BCE has consulted persons with disabilities, employees, and industry partners across Canada to inform the development of this Accessibility Plan. Our approach to consultation focused on identifying accessibility barriers experienced by persons living with different types of disabilities. We provided varied participation options to meet the needs of a diverse group of participants across Canada, including offering formats in the participant's preferred language of choice, such as English, French, ASL, and LSQ. The feedback we gathered helped prioritize the actions that are central to our Accessibility Plan.

As part of our consultation approach:

- We continue to collect feedback from our Diversability at Bell employee resource group (our Employee Resource Group), which is made up of:
  - team members who identify as persons with disabilities and have experience with accessibility barriers;

- team members experienced in the field of accessibility; and
- allies involved in supporting diversity, equity, inclusion and belonging;
- We maintain ongoing engagement with our External Advisory Panel, which is made up of internal and external stakeholders, including organizations who are experienced in the field of accessibility in Canada, representing varied geographies and accessibility needs;
- We partner with a leading accessibility vendor, who conducted a series of virtual consultation sessions and interviews with 40 participants who identify as having a wide range of physical, sensory, cognitive, and mental health disabilities. Participants were divided into four groups focused on experiences which included home services, self-install and self-repair, retail and call centre interactions, and Internet, Wi-Fi, and Fibe TV products. Before each session, participants completed tasks, including visiting select Bell Canada retail locations, to familiarize themselves with these services, using self-serve repair tools, exploring web and mobile applications, controlling Wi-Fi Pods, and installing or using Fibe TV accessibility features. Accessible participation options included ASL and LSQ

interpretation, live captioning, and chat-based input;

- We participate in Canadian Telecommunications Association (CTA) consultation activities, which includes virtual consultation sessions with persons with disabilities and organizations working within the disability community;
- We review and consider accessibility feedback that we receive through a number of channels, including through an online form, telephone call, TTY, email, regular mail, through our Accessibility Services Centre, through our call centres, in our retail stores, and on social media.

## **4.0 What We Have Accomplished**

This section sets out some of what we have accomplished since our 2023-2026 Accessibility Plan. Additional information on our progress is also set out in our 2024 and 2025 Progress Reports.

### **4.1 Employment**

Through targeted investments in training, recruitment, accommodation processes, and employee engagement,

BCE continued to strengthen the foundational elements of an inclusive and accessible workplace.

<b>Actions we committed to in the 2023-2026 Accessibility Plan</b>	<b>What we accomplished</b>
<ul style="list-style-type: none"> <li>• Begin and continue rollout of enhanced accessibility training.</li> <li>• Continue to create awareness of accessibility to foster a more inclusive workplace.</li> </ul>	<ul style="list-style-type: none"> <li>✓ Bell Canada and numerous affiliates and subsidiary companies in BCE have broadly adopted accessibility training.</li> <li>✓ The vast majority of Bell Canada employees have completed mandatory learning about accessibility.</li> </ul>
<ul style="list-style-type: none"> <li>• Encourage participation through our Employee Resource Group.</li> </ul>	<ul style="list-style-type: none"> <li>✓ Significantly grew our Employee Resource Group, which saw a 60% increase in membership.</li> </ul>
<ul style="list-style-type: none"> <li>• Promote forums for collaboration, information sharing, and discussion.</li> <li>• Continue to improve how we engage and</li> </ul>	<ul style="list-style-type: none"> <li>✓ Expanded accessibility awareness and engagement activities, including participation in National Disability</li> </ul>

<p>collaborate with persons with disabilities.</p>	<p>Employment Awareness Month (NDEAM), Red Shirt Day, Global Accessibility Awareness Day (GAAD), and the International Day of Persons with Disabilities.</p>
<ul style="list-style-type: none"> <li>• Increase awareness of BCE’s accommodation process for applicants, team members, and leaders.</li> <li>• Continue to enhance our accommodation processes.</li> <li>• Continue to evaluate how well our processes for workplace accommodation are performing.</li> <li>• Continue to support hiring managers and recruitment teams to broaden their perception and provide them with the information and</li> </ul>	<ul style="list-style-type: none"> <li>✓ Enhanced our accommodation processes by providing targeted training for Bell Canada’s Human Resources teams, and updating procedures, practical checklists, and inclusive interview tools.</li> <li>✓ Improved inclusive recruitment practices, including accessibility focused training for talent acquisition teams and guidance for leaders about offering accommodations to hiring candidates.</li> </ul>

resources they need to support a more inclusive and accessible workplace.	
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## 4.2 The Built Environment

Consistent with the commitments set out in our 2023-2026 Accessibility Plan, BCE advanced the accessibility of its corporate-owned retail stores and workplaces, with accessibility enhancements implemented primarily in locations undergoing renovations and retrofits.

<b>Actions we committed to in the 2023-2026 Accessibility Plan</b>	<b>What we accomplished</b>
Retail: <ul style="list-style-type: none"> <li>• Review retail layout designs to identify opportunities to improve accessibility and the retail shopping experience.</li> <li>• Ensure team members know all spaces must be clear of physical barriers</li> </ul>	<ul style="list-style-type: none"> <li>✓ Completed accessibility upgrades across multiple buildings and retail stores.</li> <li>✓ Worked with the Rick Hansen Foundation to get accessibility feedback and improve the accessibility of our retail locations (e.g.,</li> </ul>

<p>to enable customer mobility and encourage the use of a barrier-free ledge on checkout counters.</p> <ul style="list-style-type: none"> <li>• Review existing store operating procedures and manuals to ensure they promote barrier-free pathways; remove such barriers and proactively ensure these barriers do not occur in the future.</li> <li>• Continue efforts to include accessibility upgrades as part of building retrofits and renovation of existing retail locations.</li> </ul>	<p>clearer navigation, improved signage, seating availability in select locations including accessible back office and universal washroom in retail stores).</p> <ul style="list-style-type: none"> <li>✓ Ensured that accessibility is more consistently considered while building or renovating, with considerations including accessible design features and improved signage.</li> </ul>
<p>Workspaces (Office Buildings):</p> <ul style="list-style-type: none"> <li>• Include accessibility upgrades as part of building retrofits and renovation of existing</li> </ul>	<ul style="list-style-type: none"> <li>✓ Completed accessibility upgrades across multiple renovated buildings.</li> <li>✓ Bell Canada received a 2024 CoreNet Global Canadian Chapter REmmy Award for leadership in</li> </ul>

<p>workspace to address accessibility barriers for signage, noise levels, visual, physical access, neurodiversity, and speech.</p> <ul style="list-style-type: none"> <li>• Refer employees and leaders to the accommodation process if physical barriers are identified in the workplace.</li> </ul>	<p>accessibility, recognizing the inclusive design features incorporated into the Creekbank campus renovations.</p> <ul style="list-style-type: none"> <li>✓ Continued referring employees and leaders to the accommodation process if physical barriers are identified in the workplace.</li> <li>✓ Ensured that accessibility is more consistently considered while renovating, with considerations including accessible design features, improved signage, and wellness and neurodiversity-friendly spaces in select workplaces to support employee well-being.</li> </ul>
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## 4.3 Information and Communication Technologies (ICT)

BCE improved the accessibility of our digital products and advanced commitments we made in our 2023-2026 Accessibility Plan.

<b>Actions we committed to in the 2023-2026 Accessibility Plan</b>	<b>What we accomplished</b>
<ul style="list-style-type: none"> <li>• Adopt accessibility guidelines for information and communication technology.</li> <li>• Standardize digital accessibility guidelines, policies and practices.</li> <li>• Adopt universal design principles and best practices in digital accessibility.</li> <li>• Continuously improve training, tools, and support materials for team members to meet</li> </ul>	<ul style="list-style-type: none"> <li>✓ Developed, standardized, and implemented a digital accessibility policy and best practices to strengthen digital governance and testing processes.</li> <li>✓ Established a group dedicated to auditing and monitoring the accessibility of our websites and applications through automated scans and manual testing.</li> </ul>

<p>information and technology accessibility guidelines.</p> <ul style="list-style-type: none"> <li>• Develop an audit program to monitor the accessibility of information and communication technology.</li> <li>• Continue to evaluate the accessibility of the information and communications technologies we use when addressing both internal and external audiences.</li> <li>• Continue to simplify our processes and use language that is concise and easy to understand.</li> </ul>	<ul style="list-style-type: none"> <li>✓ Continue to regularly evaluate the accessibility of our information and communications technologies for both internal and external audiences.</li> <li>✓ Advanced our development practices by equipping teams with training modules, job aids, and checklists that support the early identification and resolution of accessibility-related bugs in our digital products.</li> </ul>
<ul style="list-style-type: none"> <li>• Make accessibility central in developing and buying devices and equipment.</li> <li>• Work with content providers, partners,</li> </ul>	<ul style="list-style-type: none"> <li>✓ Bell Canada continued standard inclusion of an accessibility clause to new and renewed vendor agreements.</li> </ul>

<p>manufacturers, and vendors to improve accessibility features and ensure they are maintained.</p>	<ul style="list-style-type: none"> <li>✓ Bell Canada provided consultation services, training and testing results to select vendors, partners and manufacturers, and worked with them to address issues.</li> <li>✓ Added tactile markers to ports on the new Wi-Fi 7 modem for Bell and Virgin Plus customers to improve usability for blind and low-vision customers, by enabling easier port identification and cable connection.</li> </ul>
<ul style="list-style-type: none"> <li>• Continue to improve websites and applications to enhance accessibility technologies we use when addressing both internal and external audiences.</li> </ul>	<ul style="list-style-type: none"> <li>✓ Updated hundreds of customer-facing websites, applications, and digital services across BCE between 2021 and 2026.</li> <li>✓ Delivered closed captioning and described video enhancements across FibeTV, Crave,</li> </ul>

	CTV and Noovo media platforms.
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### 4.4 Communication, other than ICT

BCE improved the clarity, accessibility, and consistency of our communications to both customers and employees.

<b>Actions we committed to in the 2023-2026 Accessibility Plan</b>	<b>What we accomplished</b>
<ul style="list-style-type: none"> <li>• Promote accessibility products, services, and alternate options and methods of communications to increase awareness and usage.</li> <li>• Improve customer awareness of the services provided by our Accessibility Services Centre.</li> </ul>	<ul style="list-style-type: none"> <li>✓ Updated accessibility pamphlets circulated in Bell and Virgin Plus retail stores to better inform customers of available accessible products, services, and support options.</li> <li>✓ Increased awareness of the Accessibility Services Centre by adding links to Accessibility to the top of our Virgin Plus and Lucky Mobile websites.</li> </ul>

	<ul style="list-style-type: none"> <li>✓ Updated more than 300 customer-facing and internal documents such as employee resources, templates, and operational guides to make them more accessible.</li> <li>✓ Developed a dedicated Video Relay Service (VRS) line for customers who rely on ASL and LSQ to communicate, which is directly connected to our Accessibility Services Centre.</li> </ul>
<ul style="list-style-type: none"> <li>• Develop accessibility guidelines for creating documents.</li> <li>• Continuously refine communication guidelines to create content that is simple, concise, and easy to understand.</li> <li>• Ensure accessibility needs receive</li> </ul>	<ul style="list-style-type: none"> <li>✓ Bell Canada established accessibility guidelines for creating and editing Word, PDF, and PowerPoint documents.</li> <li>✓ Bell Canada implemented document accessibility training courses to equip team members with the knowledge and awareness to create and</li> </ul>

<p>consideration in the development of marketing and advertising materials.</p>	<p>edit accessible Word, PowerPoint, PDF, and Excel documents, as well as emails.</p> <ul style="list-style-type: none"> <li>✓ Refined how we review our communications to make sure they are clear, consistent, and aligned with accessibility requirements before they are published.</li> <li>✓ Improved the Accessibility Services Centre onboarding materials to support our employees who interact with customers, which reinforces accessible communications practices.</li> </ul>
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## 4.5 The Procurement of Goods, Services and Facilities

BCE strengthened the integration of accessibility into its procurement practices.

<b>Actions we committed to in the 2023-2026 Accessibility Plan</b>	<b>What we accomplished</b>
<ul style="list-style-type: none"> <li>• Continue to evaluate current procurement policies, processes and tools to improve accessibility.</li> </ul>	<ul style="list-style-type: none"> <li>✓ Achieved 95% compliance with accessibility clause requirements in Bell Canada’s new vendor agreements.</li> <li>✓ Clarified accessibility expectations for Bell Canada’s suppliers.</li> <li>✓ Enhanced Bell Canada’s internal processes for reviewing the accessibility documentation of our vendors.</li> </ul>

## 4.6 The Design and Delivery of Programs and Services

BCE further reinforced accessibility within customer support and service delivery.

<b>Actions we committed to in the 2023-2026 Accessibility Plan</b>	<b>What we accomplished</b>
<ul style="list-style-type: none"> <li>• Explore expansion of virtual on-demand sign language interpreter program.</li> </ul>	<ul style="list-style-type: none"> <li>✓ Expanded access to Virtual Sign Language Interpretation to select Bell and Virgin Plus retail locations and added a sign language filter in the Bell and Virgin Plus Store Locators on our websites, so that customers can find in-store services that better suit their needs.</li> </ul>
<ul style="list-style-type: none"> <li>• Continue to monitor customer surveys and feedback to identify areas for improvement.</li> </ul>	<ul style="list-style-type: none"> <li>✓ Used feedback to inform this plan and identify areas for improvement.</li> </ul>
<ul style="list-style-type: none"> <li>• Continue to coach and train team members on best practices in customer service, for example: knowledge on how to send replacement equipment to customers</li> </ul>	<ul style="list-style-type: none"> <li>✓ Ensured increased uptake of accessibility training for Bell Canada call centre agents, i.e. Bell, Virgin Plus and Lucky Mobile.</li> <li>✓ Improved onboarding training, job aids, and</li> </ul>

<p>with accessibility challenges.</p>	<p>reference materials for Bell, Virgin Plus, and Lucky Mobile teams who interact with customers to reinforce that they need to communicate in an accessible way.</p> <p>✓ Refined our practices for field technicians conducting in-home and on-site visits so that customers can more easily confirm communications preferences and have quicker access to accessibility.</p>
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## 5.0 Priority Areas

The following sections outline the barriers we identified and the actions we will take to address them. Each action is categorized as short-, medium-, or long-term, or noted as ongoing work depending on required timelines for implementation.

Where opportunities for improvement remain from our 2023-2026 Accessibility Plan, we will continue to build on existing work and strengthen measures to support sustained progress.

## 5.1 Employment

### Identified Barriers

- More consistency is needed in the application of accessibility support across leadership and teams to enable inclusive practices for both visible and invisible disabilities;
- Digital tools for employees have gaps in accessibility and require improved assistive technology support;
- Accessibility information should be centralized to make it easier to find;
- Availability of accessibility supports could be better communicated during recruitment and onboarding.

### Actions and Timelines

#### Short-Term

- Expand Bell Canada's employee accessibility consultations so that employees have more opportunities each year to share their feedback;
- Use our existing communication channels to promote awareness and understanding of accessibility supports;
- Put accessibility information in one place on Bell Canada's HR platform to make information about hiring supports, available resources, and ways to give feedback easier to find;
- Monitor recruitment practices to identify potential new barriers and strengthen accessibility supports for candidates, including those with visible and invisible disabilities.

## Medium-Term

- Develop a guide for leaders with information on supporting employees with disabilities, applying consistent accessibility practices across different teams, and navigating the process with employees;
- Update the accessibility request process on Bell Canada's HR platform to help employees better understand their options, submit requests more easily, and access support.

## Long-Term

- Work towards ensuring that core digital tools used by employees support the use of assistive technologies.

## Ongoing

- Ensure accessibility remains embedded across HR policies, employment standards, hiring practices and employee experiences;
- Promote accessibility awareness of employees through our Employee Resource Group and communication campaigns;
- Continue to track completion of Bell Canada's training.

## 5.2 The Built Environment

### Identified Barriers

#### Retail Stores:

- Bright lighting, multiple screens, font size, and glare from reflective surfaces can cause discomfort and reduced focus;
- Display table heights are too high for some wheelchair users to access comfortably;

- Handsets on display tables are locked and can't retract, limiting the ways that customers can test devices;
- Our policy to lock the doors of Bell Canada retail stores is not always clearly communicated and can be difficult for customers to navigate;
- An elevator in a particular Bell Canada retail store was hard to identify and did not have sufficient signage;
- Although most Bell Canada retail stores have customer seating, prolonged standing can be difficult for persons with disabilities in retail stores that do not have customer seating;
- In shopping mall environments, some accessibility improvements related to common areas (e.g., entrances, elevators, pathways) are subject to third-party ownership and decision-making, which can limit the pace or scope of changes Bell can directly implement;
- In regions with unique environmental conditions, such as Northern and remote communities, accessibility in and around retail locations may be impacted by climate-related factors (e.g., snow and ice), including conditions in shared or third-party managed areas.

## Workspaces (Office Buildings):

- Accessibility features vary across office locations.

## Actions and Timelines

### Short-Term

- Improve the font size of signage indicating store's locked door policy that informs customers to use a door buzzer to request access;
- Ensure door buzzers are installed at a height that can be reached from a seated position;
- Add signs clearly indicating that a location has an elevator to ensure customers can easily locate it.

### Medium-Term

- Explore the use of sensory-friendly spaces in existing service areas in select Bell Canada stores.

### Long-Term

- Ensure that physical layouts, fixtures, and customer-facing elements of new Bell Canada retail stores are

developed from the start to better support a wide range of accessibility needs;

- Make seating available in select Bell Canada stores for customers who may not be able to stand for long periods of time;
- Explore implementing different ways of providing service in new Bell Canada retail stores to improve access and usability for customers;
- Research the development of interactive information hubs in future Bell Canada retail store designs, so that customers can intuitively access product information, support options, and accessibility-related resources.

## Ongoing

- Maintain regular accessibility audits of office buildings to help identify barriers and guide ongoing improvements across Bell Canada facilities as part of any new space renovation project;
- Continue to create neurodiverse spaces such as wellness and quiet rooms across office sites to support employees with a wide range of accessibility needs;
- Where feasible, Bell will continue to engage landlords, property managers, and partners to raise identified accessibility barriers and advocate for improvements within shared or third-party controlled retail environments;

- Where climate-related conditions (e.g., snow or ice) affect customer access, Bell Canada will ensure that accessible pathways are maintained for street-front retail locations under its control and will escalate identified access issues in shared or third-party-managed environments to retail facilities managers and relevant stakeholders for awareness and follow-up;
- Continue to integrate Rick Hansen Foundation design practices and accessibility considerations while planning renovations and new builds for Bell Canada retail store locations.

## 5.3 Information and Communication Technologies (ICT)

### Identified Barriers

- Fibe TV control bar is difficult for screen reader users to navigate effectively;
- Font size and contrast issues exist in bottom navigation areas across multiple mobile applications;
- Bell Canada store locator has issues with labels, zoom functionality, colour contrast, and TalkBack compatibility;

- Users experience difficulty identifying content that includes Described Video (DV) due to limited filtering and sorting options;

## Actions and Timelines

### Medium-Term

- Conduct accessibility scanning across mobile applications to improve accessibility, including font size, contrast, and navigation issues;
- Enable content filtering (search and sort) by DV in TV guide and review font sizes/icons for readability;
- Test the Bell Canada Store Locator for accessibility issues (including label stability on zoom, high-contrast selection indicator, and screen reader support) and implement required fixes;
- Expand the use of accessibility tools like scanners, checklists, and training to the internal teams that build new internal tools.

### Long-Term

- Ensure setting to increase how long the Fibe TV player control bar stays visible on the screen is available across all platforms;

- Provide refresher training on digital accessibility fundamentals to employees who help develop, maintain, and purchase digital technologies.

## Ongoing

- Continue to monitor accessibility issues, trends, and feedback to prevent accessibility issues from reoccurring;
- Regularly update and maintain accessibility training materials as technologies, tools, and accessibility standards evolve;
- Maintain ongoing improvements to accessibility testing and governance so that teams have consistent guidance, clear expectations, and reliable processes to follow.

## 5.4 Communications, other than ICT

### Identified Barriers

- In-store product and price information sometimes use small font sizes and low contrast text, making it difficult for some customers to read;

- Plain language is not used consistently across communications, which can make information harder to understand;
- Accessible or alternate formats for internal and external documents—including HR materials—are not always available.

## Actions and Timelines

### Short-Term

- Review any gaps in Bell Canada's current processes for producing accessible documents, including HR materials, and ensure documents are created, updated, and available in alternate formats.

### Medium-Term

- Where feasible, Bell will leverage relationships with accessibility organizations, advocacy groups, and community partners to increase awareness of accessibility services, supports, and resources.

## Ongoing

- Ensure key documents are available in alternate formats so that customers and employees can access information in the format that best meets their needs;
- Continue to provide alternative formats in a timely manner and clearly communicate turnaround times to requestors based on format and complexity;
- Regularly monitor customer and employee communications for accessibility gaps and address them proactively;
- Modernize Bell Canada's communications templates and workflows to ensure accessibility is built in from the start;
- Continue to apply plain language standards across customer and employee communications to ensure information is easy to read and understand. Where feasible, incorporate visual elements (e.g., icons, symbols, diagrams, and layout design) alongside plain language to improve clarity and make accessibility information easier to find and understand for diverse audiences.

## 5.5 The Procurement of Goods, Services and Facilities

### Identified Barriers

- Existing procurement practices can always be assessed for potential improvements to better support accessibility.

### Actions and Timelines

#### Ongoing

- Continue including accessibility clauses in Bell Canada vendor agreements and maintain ongoing governance practices and audits to ensure these requirements are consistently met.

## 5.6 The Design and Delivery of Programs and Services

### Identified Barriers

- Some customers reported limited awareness of accessible self-serve options (e.g., virtual reset for modems and set top boxes);
- Some users experience difficulty accessing hardware, such as identifying and connecting the correct cables to Wi-Fi pods;
- Long and/or rigid service windows create challenges for some customers with disabilities;
- Some customers may find information difficult to understand when plain language is not consistently used during call and chat interactions;
- Inconsistent staff awareness of accessibility supports (e.g., Virtual Sign Language Interpretation) was reported by some customers;
- At times customers must repeatedly explain their disability or alternate communication needs when interacting by phone or in-store.

## Actions and Timelines

### Short-Term

- Improve Bell Canada employee awareness and activation of Virtual Sign Language interpretation in select retail stores;
- Add a tactile marker to the ethernet port on Wi-Fi pods to make it easier for users to identify the correct connection point.

### Medium-Term

- Identify and address recurring gaps in staff awareness of accessibility services through structured review and targeted improvements;
- Promote the use of virtual repair and virtual reset services by customers, including promotion by virtual service agents;
- Conduct research on installation and returns (including packaging and accessibility experience) to identify barriers such as readability, placement of hardware labels, and physical access.

## Long-Term

- Investigate using plain language call and chat scripts for customer service agents, so that technical details are shared only when needed;
- Explore ongoing optimization in evolving technology projects related to customer service and compatibility with assistive technology.

## Ongoing

- Continue to promote our Accessibility Services Centre, which communicates with customers through a range of communication options including telephone, TTY, VRS, IP Relay, email, text, and mail;
- Continue to promote self-serve and self-repair digital tools by default during field visits and Bell Canada customer support interactions (e.g., virtual modem reset, remote diagnostics);
- Continue to train staff to provide clear, plain language guidance on accessibility discounts, device accessibility features, and existing service accommodations, with step-by-step support where appropriate, including when assisting caregivers or individuals supporting customers with disabilities;

- Maintain Virtual Sign Language Interpretation Service availability in select Bell Canada and Virgin Plus stores;
- Review opportunities to improve the accessibility awareness of employees and field technicians with clear job aids and escalation procedures;
- Monitor accessibility-related feedback and action as appropriate;
- Continue to offer Bell Canada customers with disabilities flexible service windows as an accommodation where feasible;
- Audit select transcripts to inform best practices, internal communications, and accessibility training;
- Sustain regular accessibility training focused on accessible communication practices, text-first workflows, and respectful customer interactions for all customer-facing staff, including field services technicians.

## 5.7 Transportation

BCE does not provide transportation services, and we did not receive actionable feedback specifically related to transportation. We will continue to monitor feedback for barriers raised specific to the area of transportation and report on addressing such barriers as they are identified.

## 6.0 Regulatory Conditions

As required by section 42(1) and section 51(1) of the ACA, we have set out the following applicable conditions and provisions:

### Licence Conditions under Part II of the Broadcasting Act

Licence conditions that relate to the identification and removal of barriers and the prevention of new barriers are set out in Appendix A.

### Provisions of any Order made under subsection 9(4) of the Broadcasting Act

Provisions of any order that relate to the identification and removal of barriers and the prevention of new barriers are set out in Appendix A.

## Provisions of any Regulations made under subsection 10(1) of the Broadcasting Act

Provisions of any regulations that relate to the identification and removal of barriers and the prevention of new barriers are set out in Appendix A.

## Conditions under section 24 or 24.1 of the Telecommunications Act

Conditions that relate to the identification and removal of barriers and the prevention of new barriers are set out in Appendix B.

## Provisions of any Regulations made under the Telecommunications Act

Provisions of any regulations that relate to the identification and removal of barriers and the prevention of new barriers are set out in Appendix B.

## **7.0 Conclusion**

BCE remains committed to advancing accessibility across all areas of our organization.

The actions outlined in this plan represent a combination of new commitments, corrective measures to address identified accessibility barriers, ongoing practices, and areas requiring further review. BCE will continue to consult with persons with disabilities, monitor progress, and publish annual updates to ensure transparency and accountability.

Our next Accessibility Progress Report will be released on or before June 1, 2027.

## 8.0 Appendices

### Appendix A – Broadcasting Act Requirements

As required by section 42(1) of the ACA, this Appendix sets out:

- 42(1)(b) - the conditions imposed by licence, issued under Part II of the Broadcasting Act, to which some or all BCE broadcasting undertakings are subject that relate to the identification and removal of barriers and the prevention of new barriers;
- 42(1)(c) - the provisions of any order made under subsection 9(4) of the Broadcasting Act that relate to the identification and removal of barriers and the prevention

of new barriers and that apply to some or all BCE broadcasting undertakings; and

- 42(1)(d) - the provisions of any regulations made under subsection 10(1) of the Broadcasting Act that relate to the identification and removal of barriers and the prevention of new barriers and that apply to some or all BCE broadcasting undertakings.

This Appendix does not include requirements that have not been in force for at least three months before the day on which the Accessibility Plan must be published<sup>2</sup> or expectations/encouragements, which do not rise to the level of imposed conditions.

## A. Accessibility Requirements – Broadcasting Distribution Undertakings (BDUs) and On-demand Services

### 1. Distribution of Programming Services

- In the small basic package, BDUs are required to distribute AMI-Audio and AMI-tv in Anglophone markets,

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<sup>2</sup> See the Accessible Canada Act (S.C. 2019, c. 10), section 42(6) with respect to Accessibility Plan. This approach adopted for Progress Report.

as well as AMI-télé and Canal M in Francophone markets.<sup>3</sup> This applies to licensed BDUs as well as exempt BDUs with more than 2,000 subscribers.<sup>4</sup>

## 2. Closed Captioning (CC), Audio Description (AD) and Described Video (DV)

- Pass-through of CC and DV: BDUs cannot alter the content or format of a programming service or delete a

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<sup>3</sup> Broadcasting Order CRTC 2018-320, Distribution of AMI-audio by licensed broadcasting distribution undertakings; Broadcasting Order CRTC 2018-321, Distribution of AMI-tv by licensed broadcasting distribution undertakings; Broadcasting Order CRTC 2018-322, Distribution of AMI-télé by licensed broadcasting distribution undertakings, Broadcasting Order CRTC 2018-308, Distribution of Canal M by licensed broadcasting distribution undertakings.

<sup>4</sup> Broadcasting Distribution Regulations (SOR/97-555), section 17(1)(g); and Broadcasting Regulatory Policy CRTC 2017-319; and Broadcasting Order CRTC 2017-320, Revised exemption order for terrestrial BDUs serving fewer than 20,000 subscribers, Appendix, paragraph 15.

programming service in the course of its distribution.<sup>5</sup>

- Community Channels:
  - BDUs shall provide AD of all key elements of information programming and appropriate training to hosts/access producers.<sup>6</sup>
  
- On-demand Services:
  - BDUs must ensure that 100% of English and French programs in inventory are CC (except community access TV programming).<sup>7</sup>
  - BDUs must implement a monitoring system to ensure that the correct signal is captioned, captioning is included in the broadcast signal, and captioning reaches the distributor of that signal in original form.<sup>8</sup>

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<sup>5</sup> BDR (SOR/97-555), section 7; and BRP 2017-319 and BO 2017-320, Appendix, paragraph 11.

<sup>6</sup> Appendix 1 to Broadcasting Decision CRTC 2020-356, Various terrestrial broadcasting distribution undertakings – Licence renewals, COL 10 and 11.

<sup>7</sup> Appendix to BRP 2017-138, Standard requirements for on-demand services, COL 21.

<sup>8</sup> Ibid., COL 22.

- When providing CC, English- and French-language On-demand Services must meet quality standards about, among other things, lag time and accuracy.<sup>9</sup>
- As of 17 December 2027, On-demand Services must provide DV for all English- and French-language new scripted pre-recorded original programs that they make available on their platforms.<sup>10</sup>
- As of 17 December 2027, On-demand Services must provide AD for all English- and French-language new original news and information programs that they make available on their platforms.<sup>11</sup>

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<sup>9</sup> Ibid., COL 23. Quality standards for French-language services are set out in BRP 2011-741-1, Quality standards for French-language closed-captioning – Enforcement, monitoring and the future mandate of the French-language CC Working Group. Quality standards for English-language services are set out in BRP 2019-308, English-language CC mandatory quality standards relating to the accuracy rate for live television programming.

<sup>10</sup> Appendix 2 to Broadcasting Regulatory Policy CRTC 2025-344

<sup>11</sup> Ibid.

- As of 17 December 2027, On-demand Services must provide an accessible search feature to find programs with DV.

### 3. Equipment that Supports Accessibility

- BDUs must provide equipment, software or other technology for customers with visual or fine motor skills disabilities to identify and have access to programming services.<sup>12</sup>
- BCE BDUs' Canadian Radio-television and Telecommunications Commission (CRTC) Annual Returns must include information on the following: availability of accessible set top boxes (STBs), remotes and accessibility features, penetration of accessible STBs and remotes, and number of accessibility-related queries received/resolved.<sup>13</sup>
- BCE BDUs must provide at least one simple means of accessing described programming (open or embedded) requiring little or no visual acuity.<sup>14</sup>
- Bell must provide one accessible set-top box to a customer requiring screen readers to whom the licensee

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<sup>12</sup> BDR (SOR/97-555), section 7.3.

<sup>13</sup> Appendix 1 to BD 2020-356, COL 9.

<sup>14</sup> Ibid., COL 12.

has not provided a set-top box capable of supporting screen reader technology<sup>15</sup>

## 4. Filing Reports to the CRTC

- Bell Canada must file a report by or before 1 June and 30 November every year on: (a) the status of the rollout of its new set-top box; and (b) the number and type of devices provided as an interim solution.<sup>16</sup>
- On-demand Services must file a report detailing the implementation strategies for the new regulatory policy for DV and AD with the CRTC by 17 September 2026.<sup>17</sup>
- On-demand Services must file a report confirming the implementation of the new regulatory policy for DV and AD with the CRTC by 17 December 2027.<sup>18</sup>
- On-demand Services must file annual reports starting November 30, 2028 including the DV quality standards followed; the number of new scripted pre-recorded original programs available with DV; the number of new

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<sup>15</sup> Appendix to Broadcasting Decision CRTC 2025-271-1

<sup>16</sup> Broadcasting Decision CRTC 2025-271, Barriers to accessibility when accessing programming via set-top boxes and other devices, paragraph 61

<sup>17</sup> Appendix 2 to Broadcasting Regulatory Policy CRTC 2025-344

<sup>18</sup> Ibid.

scripted pre-recorded third-party programs available with DV, and new scripted pre-recorded third-party programs received without DV and to which DV was added; the number of scripted pre-recorded legacy programs available with DV and the change year over year; and the number of complaints received about DV and AD.

## 5. Customer Service Related

- Promotion and Customer Service:
  - BCE BDUs shall promote disability-specific services/products in an accessible manner.<sup>19</sup>
- BCE BDUs shall make their general call centres accessible to the point of providing a reasonable accommodation to persons with disabilities by training customer service representatives to handle calls from persons with disabilities and familiarizing them with products and services for persons with disabilities, and by making their Interactive Voice Response systems accessible.<sup>20</sup>

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<sup>19</sup> Ibid., COL 13.

<sup>20</sup> Ibid., COL 18.

- Trial Period and Alternative Formats:
  - BDUs, as television service providers (TVSPs), must offer a 30-day trial period to a customer/member of a household who self-identifies as having a disability. If service/equipment does not meet the customer's needs for any reason, a customer must be able to cancel the service within the trial period without penalty, installation fees or early cancellation fees if they have returned any gift with purchase and any equipment provided (in near new condition).<sup>21</sup>
  - BDUs, as TVSPs, must provide alternative formats of written agreements and the Critical Information Summary, upon request, at no charge, at any time.<sup>22</sup>
  - Accessibility plans, progress reports, and descriptions of feedback processes published

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<sup>21</sup> Television Service Provider Code, Provision VIII: 1-3; also enforced by COL in BD 2020-356 and by the exemption order in BRP 2017-319 and BO 2017-320 for BCE exempt and affiliated BDUs, paragraph 27.

<sup>22</sup> Ibid., Provision VII: 3 and IX: 4d 3; also enforced by COL in BD 2020-356 and by the exemption order in BRP 2017-319 and BO 2017-320 for BCE exempt and affiliated BDUs, paragraph 27.

under the ACA must be made available, upon request, in print, large print, braille, audio format, electronic format that is compatible with adaptive technology that is intended to assist persons with disabilities, or any other format that the person and the regulated broadcasting entity agree upon and for which there is proof of the agreement.<sup>23</sup>

## 6. Website Accessibility

- BCE BDUs must have an easy-to-find home page link to a section of their websites “dealing with the needs of persons with disabilities”.<sup>24</sup>
- BCE BDUs must make information on their websites accessible to the point of providing a reasonable accommodation for persons with disabilities.<sup>25</sup>

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<sup>23</sup> Canadian Radio-television and Telecommunications Commission Accessibility Reporting Regulations (SOR/2021-160), sections 8, 11, and 15.

<sup>24</sup> Appendix 1 to BD 2020-356, COL 14.

<sup>25</sup> Ibid., COL 15; Examples of what the CRTC consider to be reasonable accommodations are listed in paragraph 66 of Broadcasting and Telecom Regulatory Policy CRTC 2009-430, Accessibility of telecommunications and broadcasting services.

- Where customer service functions on their websites are not accessible, BCE BDUs must ensure that persons with disabilities will not incur a charge or otherwise be disadvantaged if they use an alternate avenue of customer service.<sup>26</sup>
- BCE BDUs shall make accessible any customer service functions that are available solely over their websites.<sup>27</sup>
- Accessibility plans, progress reports, and descriptions of feedback processes published under the ACA must be published in a way that meets W3C Web Content Accessibility Guidelines (WCAG) guidelines.<sup>28</sup>

## B. Accessibility Requirements – Programming Undertakings and Online Undertakings

### 1. Offering CC

- Television Stations (TS) requirements:
  - TS must caption 100% of English- and French-language programs broadcast over the broadcast

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<sup>26</sup> Ibid., COL 16.

<sup>27</sup> Ibid., COL 17.

<sup>28</sup> CRTC Accessibility Reporting Regulations (SOR/2021-160), sections 4, 10, and 14.

- day.<sup>29</sup> TS must ensure that advertising, sponsorship messages and promos in English and French languages are closed captioned.<sup>30</sup>
- TS must implement a monitoring system to ensure that, for any signal that is closed captioned, the correct signal is captioned, the captioning is included in its broadcast signal, and this captioning reaches the distributor of that signal, in its original form.<sup>31</sup>
  - When providing CC, English- and French-language TS must meet quality standards about, among other things, lag time and accuracy.<sup>32</sup>
- Discretionary Services (DS) requirements:

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<sup>29</sup> Appendix 1 to Broadcasting Regulatory Policy CRTC 2016-436, Standard requirements for television stations, discretionary services, and on-demand services, COL 9.

<sup>30</sup> Ibid., COL 10; and BTRP 2009-430.

<sup>31</sup> Ibid.

<sup>32</sup> Appendix 1 to BRP 2016-436, Standard conditions of licence, expectations and encouragements for television stations, COL 11 a) b); Quality standards to be met are set out in BRP 2011-741-1 (French-language services) and in BRP 2019-308 (English-language services).

- DS must caption 100% of English- and French-language programs broadcast over the broadcast day.<sup>33</sup>
- A DS operating in its first licence term shall ensure that advertising, sponsorship messages and promos in the English and French languages are closed captioned by no later than the fourth year of the licence term. For a DS operating in its second or subsequent licence term, it shall ensure that advertising, sponsorship messages and promos in the English and French languages are closed captioned.<sup>34</sup>
- DS should implement a monitoring system to ensure that, for any signal that is closed captioned, the correct signal is captioned, the captioning is included in its broadcast signal, and this captioning reaches the distributor of that signal, in its original form.<sup>35</sup>

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<sup>33</sup> Appendix 1 to BRP 2023-306, Standard conditions of service, expectations and encouragements for discretionary services, COL 11.

<sup>34</sup> Appendix 1 to BRP 2023-306, COL 12; and BTRP 2009-430.

<sup>35</sup> Appendix 1 to BRP 2023-306, COL 13.

- When providing CC, English- and French-language DS must meet quality standards about, among other things, lag time and accuracy.<sup>36</sup>
- On-demand Services requirements:
  - On-demand Services must caption 100% of English- and French-language programs in its inventory.<sup>37</sup>
  - On-demand Services should implement a monitoring system to ensure that, for any signal that is closed captioned, the correct signal is captioned, the captioning is included in its broadcast signal, and this captioning reaches the distributor of that signal, in its original form.<sup>38</sup>

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<sup>36</sup> Ibid., COL 14; Quality standards to be met are set out in BRP 2011-741-1 (French-language services) and in BRP 2019-308 (English-language services).

<sup>37</sup> Appendix 3 to BRP 2016-436, Standard conditions of licence, expectations and encouragements for on-demand services, COL 21.

<sup>38</sup> Appendix 3 to BRP 2016-436, COL 22; and BTRP 2009-430.

- When providing CC, English- and French-language On-demand Services must meet quality standards about, among other things, lag time and accuracy.<sup>39</sup>
- Mainstream Sports Services (MSS):
  - MSS shall caption 100% of programs over the broadcast day.<sup>40</sup>
  - When providing CC, MSS shall adhere to quality standards about, among other things, lag time and accuracy.<sup>41</sup>
  - MSS must implement a monitoring system to ensure that, for any signal that is closed captioned, the correct signal is captioned, the captioning is

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<sup>39</sup> Appendix 3 to BRP 2016-436, COL 23; Quality standards to be met are set out in BRP 2011-741-1 (French-language services) and in BRP 2019-308 (English-language services).

<sup>40</sup> Appendix 3 to Broadcasting Regulatory Policy CRTC 2023-306, Conditions of service, expectations and encouragement for mainstream sports discretionary services, COL 6.

<sup>41</sup> Ibid., COL 7; and BTRP 2009-430; Quality standards to be met are set out in BRP 2011-741-1 (French-language services) and in BRP 2019-308 (English-language services).

included in its broadcast signal and this captioning reaches the distributor of that signal in its original form.<sup>42</sup>

- National News Services (NNS):
  - NNS shall caption 100% of its programs over the broadcast day.<sup>43</sup>
  - When providing CC, NNS shall adhere to quality standards about, among other things, lag time and accuracy.<sup>44</sup>
  - NSS shall ensure that advertising, sponsorship messages and promos in the English and French languages are closed captioned.<sup>45</sup>
  - NSS shall implement a monitoring system to ensure that, for any signal that is closed captioned, the correct signal is captioned, the captioning is included in its broadcast signal and this captioning

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<sup>42</sup> Appendix 3 to BRP 2023-306, COL 7; and BTRP 2009-430.

<sup>43</sup> Appendix 2 to BRP 2023-306, COL 7.

<sup>44</sup> Ibid., COL 8; Quality standards to be met are set out in BRP 2011-741-1 (French-language services) and in BRP 2019-308 (English-language services).

<sup>45</sup> Appendix 2 to BRP 2023-306, COL 9; and BTRP 2009-430.

reaches the distributor of that signal in its original form.<sup>46</sup>

## 2. Offering AD

- “Audio Description” or “AD” refers to announcers reading aloud the textual and graphic information that is displayed on the screen during information programs.
- TS and DS shall provide AD for all the key elements of Canadian information programs, including news programming.<sup>47</sup>
- MSS shall provide AD for all the key elements of information programs, including news programming.<sup>48</sup>
- NNS shall provide AD for all the key elements of information programs, including news programming.<sup>49</sup>
- As of 17 December 2027, Audio-visual Online Undertakings shall provide AD for all English- and French-language new original news and information programs that they make available on their platforms.<sup>50</sup>

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<sup>46</sup> Appendix 2 to BRP 2023-306.

<sup>47</sup> Appendix 1 to BRP 2016-436, COL 13; and Appendix 1 to BRP 2023-306, COL 16.

<sup>48</sup> Appendix 3 to BRP 2023-306, COL 8.

<sup>49</sup> Appendix 2 to BRP 2023-306, COL 10.

<sup>50</sup> Appendix 2 to Broadcasting Regulatory Policy CRTC 2025-344

### 3. Offering DV

- Television Stations:
  - BCE television stations shall provide DV for all English- and French-language programming that is broadcast during prime time (i.e., from 7 p.m. to 11 p.m.) and that is drawn from specific program categories<sup>51</sup>, with the exception of U.S. programming received without described video less than 24 hours prior to air. Such programs will be broadcast with described video for any repeat airings scheduled greater than 24 hours from delivery. In such cases, a logo is to be displayed at the start of the first airing and an audio notification

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<sup>51</sup> This requirement applies to the following program categories set out in Item 6 of Schedule 1 to the Television Broadcasting Regulations, 1987, as amended from time to time: 2(b) Long-form documentary, 7 Drama and comedy, 9 Variety, 11(a) General entertainment and human interest and 11(b) Reality television, and/or is programming targeting preschool children (0-5 years of age) and children (6-12 years of age).

is to be provided indicating that repeat broadcasts will be aired with full DV at a future time.<sup>52</sup>

- Discretionary Services:
  - BCE discretionary services shall provide DV for all English- and French-language programming that is broadcast during prime time (i.e., from 7 p.m. to 11 p.m.) and that is drawn from specific program categories<sup>53</sup>

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<sup>52</sup> Appendix 3 to Broadcasting Decision CRTC 2017-149, Bell Media Inc. – Licence renewals for English-language television stations and services, COL 1; and Broadcasting Regulatory Policy CRTC 2019-392, Amendment proposed by Bell Media Inc., Corus Entertainment Inc. and Rogers Media Inc. to their condition of licence that requires prime time programming to be broadcast with described video, paragraph 40.

<sup>53</sup> This requirement applies to the following program categories set out in Item 6 of Schedule 1 to the Discretionary Services Regulations: 2(b) Long-form documentary, 7 Drama and comedy, 9 Variety, 11(a) General entertainment and human interest and 11(b) Reality television, and/or is programming targeting

with the exception of U.S. programming received without described video less than 24 hours prior to air. Such programs will be broadcast with described video for any repeat airings scheduled greater than 24 hours from delivery. In such cases, a logo is to be displayed at the start of the first airing and an audio notification is to be provided indicating that repeat broadcasts will be aired with full DV at a future time.<sup>54</sup>

- National News Services:
  - NNS subject to DV requirements prior to renewal or that belong to a vertically integrated entity shall provide DV for programming broadcast between 7 p.m. and 11 p.m., seven days a week, drawn from

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preschool children (0-5 years of age) and children (6-12 years of age).

<sup>54</sup> Appendix 4 to BD 2017-149, COL 1; and BRP 2019-392, paragraphs 40 and 41.

specific program categories.<sup>55 56</sup>

- Online Undertakings:
  - As of 17 December 2027, Audio-visual online streaming undertakings shall provide DV for all English- and French-language new scripted pre-recorded original programs that they make available on their platforms.<sup>57</sup>
  - As of 17 December 2027, Audio-visual online streaming undertakings shall provide an accessible

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<sup>55</sup> Those specific categories are the following: 2(b) Long-form documentary, 7 Drama and comedy, 9 Variety, 11(a) General entertainment and human interest and 11(b) Reality television, set out in item 6 of Schedule I to the Specialty Services Regulations, 1990 (the Regulations), as well as programming targeting children.

<sup>56</sup> Appendix 2 to BRP 2023-306, COL 11; and Broadcasting Regulatory Policy CRTC 2015-104, Let's Talk TV - Navigating the Road Ahead - Making informed choices about television providers and improving accessibility to television programming.

<sup>57</sup> Appendix 2 to Broadcasting Regulatory Policy CRTC 2025-344

search feature to find programs with described video.<sup>58</sup>

## 4. Filing reports with the CRTC

- For French-language services, every two years broadcasters must provide the CRTC with a report describing their efforts made in-house and requests to captioning providers in order to improve the accuracy rate.<sup>59</sup>
- For English-language services, every year, broadcasters must provide the Commission with a report describing their efforts made in-house and requests to caption providers to improve the English-language CC accuracy rate for live television programming during the broadcast year.<sup>60</sup>
- Bell Media must file the Described Video Working Group Report every six months.<sup>61</sup>

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<sup>58</sup> Appendix 2 to Broadcasting Regulatory Policy CRTC 2025-344

<sup>59</sup> Appendix to BRP 2011-741-1, paragraph 4.

<sup>60</sup> Appendix 1 to BRP 2019-308, paragraph 4.

<sup>61</sup> Broadcasting Decision CRTC 2023-245, Various television programming services and networks, and broadcasting distribution undertakings – Administrative renewals; BRP 2019-392, paragraph 43.

- Bell Canada must file a report by or before 1 June and 30 November every year on: (a) the status of the rollout of its new set-top box; and (b) the number and type of devices provided as an interim solution.<sup>62</sup>
- Audio-visual Online Undertakings must file a report detailing the implementation strategies for the new regulatory policy for DV and AD with the CRTC by 17 September 2026.<sup>63</sup>
- Audio-visual Online Undertakings must file a report confirming the implementation of the new regulatory policy for DV and AD with the CRTC by 17 December 2027.<sup>64</sup>
- Audio-visual Online Undertakings must file annual reports starting November 30, 2028 including the DV quality standards followed; the number of new scripted pre-recorded original programs available with DV; the number of new scripted pre-recorded third-party programs available with DV, and new scripted pre-recorded third-party programs received without DV and to which DV was added; the number of scripted pre-

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<sup>62</sup> Broadcasting Decision CRTC 2025-271, Barriers to accessibility when accessing programming via set-top boxes and other devices, paragraph 61

<sup>63</sup> Appendix 2 to Broadcasting Regulatory Policy CRTC 2025-344

<sup>64</sup> Ibid.

recorded legacy programs available with DV and the change year over year; and the number of complaints received about DV and AD.

## 5. Alternative Formats and Website Accessibility

- Accessibility plans, progress reports, and descriptions of feedback processes published under the ACA must be made available, upon request, in print, large print, braille, audio format, electronic format that is compatible with adaptive technology that is intended to assist persons with disabilities, or any other format that the person and the regulated broadcasting entity agree upon and for which there is proof of the agreement.<sup>65</sup>
- Accessibility plans, progress reports, and descriptions of feedback processes published under the ACA must be published in a way that meets WCAG guidelines.<sup>66</sup>

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<sup>65</sup> CRTC Accessibility Reporting Regulations (SOR/2021-160), sections 8, 11, and 15.

<sup>66</sup> Ibid., sections 4, 10, and 14.

## Appendix B – Telecommunications Act Requirements

As required by section 51(1) of the ACA, this Appendix sets out:

- 51(1)(b) - the conditions imposed under section 24 or 24.1 of the Telecommunications Act to which some or all of BCE is subject that relate to the identification and removal of barriers and the prevention of new barriers; and
- 51(1)(c) - the provisions of any regulations made under the Telecommunications Act that relate to the identification and removal of barriers and the prevention of new barriers and that apply to some or all of BCE.

This Appendix does not include requirements that have not been in force for at least three months before the day on which the Accessibility Plan must be published<sup>67</sup> or expectations/encouragements, which do not rise to the level of imposed conditions.

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<sup>67</sup> See the Accessible Canada Act (S.C. 2019, c. 10), section 51(6) with respect to Accessibility Plan. This approach adopted for Progress Report.

# 1. Offering and Promotion of Accessible Products and Services

- Wireless Service Providers (WSPs) must offer mobile wireless service plans that meet the needs of Canadians with disabilities.<sup>68</sup>
- WSPs must promote and publicize their disability-specific products and services on their websites and using other methods.<sup>69</sup> WSPs must offer at least one type of wireless mobile handset that will provide access for persons who are blind and/or have moderate-to-severe mobility or cognitive disabilities.<sup>70</sup>
- Telecommunications Service Providers (TSPs) must make general call centres accessible to the point of providing a reasonable accommodation by training customer service representatives to handle questions from persons with disabilities and familiarizing customer service representatives with accessible products and services.<sup>71</sup>

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<sup>68</sup> Telecom Regulatory Policy CRTC 2016-496, Modern telecommunications services – The path forward for Canada’s digital economy, paragraph 212.

<sup>69</sup> Ibid., paragraphs 56 and 214.

<sup>70</sup> BTRP 2009-430, paragraph 44.

<sup>71</sup> Ibid., paragraph 69.

- Internet Service Providers (ISPs) subject to the Internet Code must ensure that customer service representatives receive training on rights and responsibilities under the Internet Code, including accessibility needs.<sup>72</sup>
- TSPs must make their interactive voice response (IVR) systems accessible. A service provider with a disability call centre could meet this requirement by developing and implementing a process for the appropriate transfer of calls to that call centre.<sup>73</sup>
- A Critical Information Summary, provided under either the Internet Code or the Wireless Code, must set out information, including about the extended trial period for customers who self-identify as having a disability.<sup>74</sup>
- ISPs subject to the Internet Code must file compliance reports including a description of how they are ensuring that their customer service representatives are knowledgeable about rights and responsibilities under

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<sup>72</sup> Telecom Regulatory Policy CRTC 2019-269, The Internet Code, paragraph 463.

<sup>73</sup> BTRP 2009-430, paragraph 69.

<sup>74</sup> TRP 2019-269, Appendix 1 C.1(iii); and Telecom Regulatory Policy CRTC 2017-200, Review of the Wireless Code, Appendix 1 C.1(iii).

the Internet Code, including those related to persons with disabilities.<sup>75</sup>

- Certain WSPs must create and promote videos in American Sign Language (ASL) or Langue des Signes Québécoise (LSQ) to promote the Wireless Code and explain common terminology.<sup>76</sup>
- ISPs subject to the Internet Code must create and promote videos in ASL/LSQ to promote the Internet Code, including the extended trial period for persons with disabilities, and explain common terminology.<sup>77</sup>
- TSPs that will transition to ten-digit local dialing in order to implement 9-8-8 must provide information about the transition to ten-digit local dialing in ASL and LSQ.<sup>78</sup>

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<sup>75</sup> TRP 2019-269, paragraph 469.

<sup>76</sup> TRP 2017-200, paragraphs 377 and 382.

<sup>77</sup> TRP 2019-269, paragraph 466.

<sup>78</sup> Telecom Regulatory Policy CRTC 2022-234, Introduction of 9-8-8 as the three-digit abbreviated dialing code for mental health crisis and suicide prevention services and Northwestel Inc.'s application for modified implementation of ten-digit local dialing, paragraph 142.

- WSPs must engage in regular, at least yearly, consultations with persons with disabilities and groups representing their interests.<sup>79</sup>
- WSPs must file annual reports in an accessible format regarding accessible plans and ongoing consultations. These annual reports must include certain types of information specified by the Commission.<sup>80</sup>

## 2. Message Relay Service (MRS)

- All local exchange carriers (LECs) must provide teletypewriter (TTY) and Internet protocol (IP) Relay services to their telephone customers 24 hours a day, 7 days a week.<sup>81</sup>
- WSPs must provide IP Relay to their retail customers 24 hours a day, 7 days a week.<sup>82</sup>

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<sup>79</sup> Telecom Regulatory Policy CRTC 2023-41, Mobile wireless service plans that meet the needs of Canadians with various disabilities, paragraph 140.

<sup>80</sup> TRP 2023-41, paragraphs 141 to 142.

<sup>81</sup> BTRP 2009-430, paragraphs 11 and 21.

<sup>82</sup> Telecom Regulatory Policy CRTC 2018-466, Review of the regulatory framework for text-based message relay services, paragraph 31.

- MRS Providers<sup>83</sup> providing IP Relay and MRS Providers with an obligation to provide TTY must meet the minimum requirements set out in Appendix 1 to TRP 2018-466.<sup>84</sup>
- Certain TSPs must file annual reports on quality of service data, as set out in Appendix 2 to TRP 2018-466.<sup>85</sup>
- TSPs must fund video relay service (VRS) via the National Contribution Fund.<sup>86</sup>
- Bell Canada and certain affiliates must equip certain of their payphones with TTY.<sup>87</sup>
- WSPs must take steps to ensure that Deaf and Hard of Hearing sign language users are able to make and receive calls through VRS in a comparable way to hearing users accessing voice services.<sup>88</sup>
- TSPs are expected to be active participants in VRS education and outreach by advertising VRS on their accessibility webpages, training customer service

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<sup>83</sup> As defined in *ibid.*, paragraphs 9 to 12.

<sup>84</sup> *Ibid.*, paragraphs 153 and 156, and Appendix 1.

<sup>85</sup> *Ibid.*, paragraph 163 and Appendix 2.

<sup>86</sup> Telecom Regulatory Policy CRTC 2014-187, Video relay service.

<sup>87</sup> Telecom Decision CRTC 2004-47, Access to pay telephone service, paragraphs 144 to 148.

<sup>88</sup> TRP 2023-41, paragraph 146.

representatives to handle VRS calls, and considering setting up a dedicated telephone number for VRS users to reach VRS-trained representatives.<sup>89</sup>

### 3. Trial Periods

- If a customer self-identifies as a person with a disability, then ISPs subject to the Internet Code must offer an extended trial period of at least 30 days, and the permitted usage amounts must be at least double the service provider's usage limits for the standard trial period.<sup>90</sup>
- If a customer self-identifies as a person with a disability, then WSPs must offer a 30-day extended trial period, and the permitted usage amounts must be at least double the service provider's usage limits for the standard trial period. WSPs must also promote the extended trial period in the accessibility section of their website.<sup>91</sup>

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<sup>89</sup> Telecom Regulatory Policy CRTC 2025-54, paragraph 161

<sup>90</sup> TRP 2019-269, Appendix 1 G.2.

<sup>91</sup> TRP 2017-200, Appendix 1 G.4(iv) and paragraph 327.

## 4. 9-1-1

- MRS providers must provide access to 9-1-1 service.<sup>92</sup>
- WSPs and incumbent local exchange carriers (ILECs) must provide Text with 9-1-1 service.<sup>93</sup>

## 5. Alternative Formats

- TSPs must provide paper bills upon request at no charge to customers who self-identify as a person with a disability.<sup>94</sup>
- Canadian carriers must provide bills, bill inserts, and information setting out the rates, terms and conditions in alternative accessible formats, such as in braille or large print, for people with a visual disability.<sup>95</sup>

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<sup>92</sup> TRP 2018-466, paragraph 229.

<sup>93</sup> Telecom Decision CRTC 2013-22, CISC Emergency Services Working Group – Consensus report regarding Text Messaging with 9-1-1 trial and service implementation.

<sup>94</sup> Telecom and Broadcasting Decision CRTC 2022-28, When and how communications service providers must provide paper bills.

<sup>95</sup> Telecom Order CRTC 98-626; TD 2002-13, Extending the availability of alternative formats to consumers who

- ISPs subject to the Internet Code must provide a copy of the contract, related documents, and Critical Information Summary in an accessible format for persons with disabilities upon request, at no charge.<sup>96</sup>
- WSPs must provide a copy of the contract, related documents, and Critical Information Summary in an accessible format for persons with disabilities upon request, at no charge.<sup>97</sup>
- ILECs/TSPs, as applicable, must provide the following documents in alternative formats to persons with visual impairments, upon request: information on the National Do Not Call List, information on Bill Management Tools, retail quality of service information, notification of the removal of the last payphone in a community, the incumbent local exchange carriers' communications plans on local forbearance, and information on dialing plan changes.<sup>98</sup>

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are blind; and, TO 2001-690, Alternative formats for a person who is blind.

<sup>96</sup> TRP 2019-269, Appendix 1 B.4(i) and C.1(v).

<sup>97</sup> TRP 2017-200, Appendix 1 B.1(ii), B.2(v), and C.1(v).

<sup>98</sup> Telecom Regulatory Policy CRTC 2010-132, Follow-up to Broadcasting and Telecom Regulatory Policy 2009-430– Requirements for telecommunications service providers to communicate certain information in alternative formats.

- Accessibility plans, progress reports, and descriptions of feedback processes published under the ACA must be made available, upon request, in print, large print, braille, audio format, electronic format that is compatible with adaptive technology that is intended to assist persons with disabilities, or any other format that the person and the regulated entity agree upon and for which there is proof of the agreement.<sup>99</sup>

## 6. Website Accessibility

- TSPs must make the information on telecommunications and broadcasting services and products on their websites accessible to the point of providing a reasonable accommodation for persons with disabilities.<sup>100</sup>
- TSPs must make customer service functions that are available solely over the service providers' websites accessible. If a customer service function on the service providers' website is not accessible, then persons with disabilities cannot be charged or disadvantaged for using an alternate channel to access those functions.<sup>101</sup>

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<sup>99</sup> CRTC Accessibility Reporting Regulations (SOR/2021-160), sections 24, 27, and 31.

<sup>100</sup> BTRP 2009-430, paragraph 65.

<sup>101</sup> Ibid., paragraph 68.

- TSPs must have an easy-to-find home page link to the accessibility section of their websites, if their websites include such sections.<sup>102</sup>
- If a service provider subject to the Internet Code applies overage fees, the service provider must offer tools, at no charge, to help a customer monitor and manage their data usage and any additional fees incurred during a monthly billing cycle. These tools must be accessible to customers with disabilities.<sup>103</sup>
- MRS providers must ensure that any IP Relay related web and mobile interfaces meet W3C Web Content Accessibility Guidelines (WCAG).<sup>104</sup>
- Accessibility plans, progress reports, and descriptions of feedback processes published under the ACA must be published in a way that meets WCAG guidelines.<sup>105</sup>

## 7. Passing On Obligations

- Canadian carriers, as a condition of offering and providing telecommunications services to non-

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<sup>102</sup> Ibid., paragraph 57.

<sup>103</sup> TRP 2019-269, Appendix 1 E.2(i).

<sup>104</sup> TRP 2018-466, paragraph 151.

<sup>105</sup> CRTC Accessibility Reporting Regulations (SOR/2021-160). sections 21, 26, and 30.

carriers,<sup>106</sup> must include in their tariffs and in service contracts or other arrangements with these non-carriers, the requirement that the non-carriers and all of their wholesale customers and subordinate wholesale customers, abide by certain obligations, including those set out in the Appendix to TRP 2017-11 related to accessibility and the removal of barriers.<sup>107</sup>

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<sup>106</sup> As defined in Telecom Regulatory Policy CRTC 2017-11, Application of regulatory obligations directly to non-carriers offering and providing telecommunications services, paragraph 29.

<sup>107</sup> Ibid.