



TELUS Communications Inc.

# Accessibility Plan 2023–2026



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# Message from Hilan Wong, Senior Vice President, Consumer Marketing & Channels

TELUS strives to be an industry leader with respect to social capitalism. We continue to use world-leading technology to create meaningful change. A central component of TELUS' social capitalism is actively promoting the values of diversity, inclusion and accessibility. We are committed as an organization to providing barrier-free experiences for our customers and our employees.

TELUS has made incredible strides in ensuring an inclusive and welcoming environment. We are proud to be listed as one of Canada's Best Diversity Employers a total of thirteen times, including the last four years in a row.

TELUS has been intentional in providing products and services for customers with varying disabilities. We take feedback from persons with disabilities very seriously. We offer many opportunities for customers to provide feedback on their experiences. We are proactive in implementing feedback received from those with lived experience of disability. TELUS is also proactive in conducting user testing of products, such as cell phones. We train TELUS employees to be aware of accessibility features of the products. We want our employees to understand which products are the best fit for people with different types of disabilities.

TELUS is also proud to offer philanthropic programs that promote equal access to technology, such as its Tech for Good program. Tech for Good supports people with disabilities who require specialized assistance to independently use or control their mobile device, regardless of their service provider. The program is primarily educational in nature. It provides customized training to enable persons with disabilities to independently use their smartphone or tablet. In some cases, the program also provides assistive technology, including hardware and software.

TELUS' new national partner, March of Dimes Canada (MODC), is providing this specialized training and support on behalf of TELUS. MODC's mission is to maximize the independence, personal empowerment and community participation of people with physical disabilities. TELUS is MODC's chosen partner because it is renowned for delivering lasting outcomes to clients.

TELUS demonstrates significant strengths in accessibility and strives to be a true leader in accessibility in Canada and the world. This TELUS Accessibility Plan shares our commitments to upholding the principles of the [Accessible Canada Act](#) (ACA). It outlines the actions we will take to remove and reduce barriers at TELUS for persons living with disabilities. I am confident that, through this Accessibility Plan, we will continue to build an even friendlier future for our customers and employees.

## Hilan Wong

Senior Vice President, Consumer Marketing & Channels  
Executive Sponsor for the Abilities Resource Group

# General

## Introduction

TELUS Communications Inc. (TELUS) is a Canadian national telecommunications company. It is a subsidiary of TELUS Corporation. TELUS Communications Inc. offers a range of telecommunications and broadcasting programs and services. This includes Internet, home phone, smart home security, mobility, television bundles and online security. TELUS is headquartered in Vancouver, British Columbia. It has over 65,000 employees across Canada.

This Accessibility Plan applies to accessibility within our broadcasting and telecommunications services provided through TELUS. It also applies to accessibility within other brands and affiliated companies, including Altima, GoCo, Koodo, Mascon by TELUS, Public Mobile and Start.ca.<sup>1</sup> This Accessibility Plan includes barriers to accessibility and actions we will take to remove barriers within each of these TELUS entities.

## Contact information

TELUS welcomes feedback on this Accessibility Plan. You may request an alternative format of this Plan. You can also request a description of the feedback process for accessibility at TELUS in an alternative format. To provide feedback or request an alternative format, please contact:

### **Accessibility prime**

Email: [accessible@telus.com](mailto:accessible@telus.com)

Phone: 1-866-558-2273

TELUS Relay Service: Dial 711 to reach a TTY operator

Mail:

TELUS Mobility Client Care  
200 Consilium Place, Suite 1600  
Scarborough, Ontario  
M1H 3J3

The following alternative formats are available upon request:

- Print
- Large Print
- Braille
- Other electronic formats that are compatible with adaptive technologies

For more information about the feedback process for accessibility at TELUS, please visit our [Accessibility Feedback Webpage](#).

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<sup>1</sup> TELUS, along with the words "we", "us", "our" refer to the TCCI 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 "TELUS"). Those companies and brands may include, but are not limited to: TCCI, Koodo Mobile, Public Mobile Inc., Altima Solutions Limited, Mascon Communications Corp. and GoCo Technology Limited.

## Accessibility Plan development process

To assist with creating this Accessibility Plan, TELUS engaged a third-party consulting firm (the “Consulting Firm”) to conduct a deep dive into TELUS’ existing accessibility practices and provide recommendations. Internal stakeholders provided key input in the shaping of this document. Stakeholders included the marketing, digital, regulatory, legal and other teams.

First, the Consulting Firm conducted a thorough review of TELUS’ documented processes and policies. The Consulting Firm examined accessibility in the seven priority areas outlined in the *Accessible Canada Act* (ACA). The Consulting Firm also conducted an accessibility assessment of TELUS websites. The Consulting Firm then interviewed key members of the teams responsible for the ACA priority areas. Lastly, the Consulting Firm conducted consultations with and reviewed feedback from persons with disabilities.

The accessibility assessments identified barriers to accessibility at TELUS. They also shaped the actions outlined in this Accessibility Plan to remove or reduce those barriers.

## Consultations

The Consulting Firm consulted with TELUS customers and employees using four methods in the creation of this Accessibility Plan.

1. The Consulting Firm interviewed key TELUS employees from each of the ACA priority areas. The Consulting Firm also interviewed key employees from the ACA priority areas within each of the TELUS entities.
2. The Consulting Firm held focus groups with the TELUS Accessibility Advisory Council. This Council includes employees who identify as having one or more disabilities and/or are caregivers of individuals with disabilities.
3. The Consulting Firm analyzed the feedback received from a 2022 employee survey that included responses from employees with disabilities.
4. The Consulting Firm sent a customer survey about accessibility in March 2023. In total, 539 customers completed the survey. Many of the respondents identified as having a disability.

The identified barriers and actions in this Accessibility Plan were created based on the feedback received from TELUS customers and employees.

## Definitions

### Accessibility

Accessibility refers to how services, technology, locations, devices, environments and products are designed with persons with disabilities in mind. Accessibility means giving people of all abilities equal opportunities to take part in life activities. The term implies conscious planning and effort to make sure something is barrier-free for persons with disabilities. Accessibility benefits everyone.

## Barrier

According to the ACA, a barrier is “anything – including anything physical, architectural, technological, or attitudinal, anything that is based on information or communications or anything that is the result of a policy or a practice – that hinders the full and equal participation in society of persons with an impairment, including a physical, mental, intellectual, cognitive, learning, communication or sensory impairment or a functional limitation.”

## Disability

According to the ACA, disability is “any impairment, including a physical, mental, intellectual, cognitive, learning, communication or sensory impairment – or a functional limitation – whether permanent, temporary or episodic in nature, or evident or not, that, in interaction with a barrier, hinders a person’s full and equal participation in society.”

## Principles of the Act

The Principles of the ACA are set out at [section 6](#) of that Act. They 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.

TELUS strives to create a friendlier future for everyone. The Principles of the ACA are embedded in our Accessibility Plan. They are also a part of our values and culture at TELUS.

The ACA Principles drove the process for creating our Accessibility Plan. Persons with disabilities were involved throughout the process. The perspectives of persons with disabilities guided the identification of barriers and recommended actions outlined in this Plan. We will continue to consult with customers and employees with disabilities as we develop progress reports and accessibility plans in the future.

TELUS aims to have a culture where everyone is treated with dignity and respect. We want everyone to have the same opportunities and to feel welcome and included. Our goal is to have a workplace culture where employees can bring their best self to work. This is evidenced throughout our Accessibility Plan.

We understand how important it is for employees and customers to make choices based on their individual needs and preferences. People interact with their environments in different

ways. People also have different situated experiences and intersectional identities. In our Accessibility Plan, we outline ways that we will continue to offer choices for our customers and employees.

TELUS is committed to continuous improvement. In our Accessibility Plan, we demonstrate how TELUS aims to achieve the highest level of accessibility possible for persons with disabilities. We will work towards becoming a barrier-free organization by taking the actions outlined in this Accessibility Plan.

# Areas described under section 5 of the Act

There are seven priority areas described under Section 5 of the ACA. These areas include:

- 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

This Plan outlines the priority areas for TELUS as well as each TELUS entity. Each priority area section will include:

- a short summary,
- what we are doing well,
- barriers to accessibility; and
- the actions we will be pursuing to reduce and remove barriers to accessibility at TELUS.



# TELUS Communications Inc.

## priority areas

### Employment

The Employment priority area covers an employee's entire experience at TELUS. It starts from the recruitment and onboarding process. It ends when the individual leaves the organization. It also includes accommodation and short- and long-term disability absences from work.

### What we are doing well

TELUS has implemented many practices to promote inclusivity and accessibility in the workplace. We attract candidates with disabilities through recruiting events and co-op and internship programs. We partner with disability advocacy organizations. Accessibility is built into our online application system. It allows candidates to self-identify as a person with a disability. TELUS recruiters receive accessibility and disability awareness training and ask non-discriminatory interview questions. We also offer accommodations during the recruitment process. We consider accessibility needs during performance management and career development.

TELUS offers extensive training for employees related to accessibility and inclusion. This includes a Workplace Mental Health Leadership Certificate Program and Psychological Safety Learning Circles. It also includes a neuroscience-based unconscious bias learning program.

TELUS asks for feedback from team members through a diverse range of listening mechanisms on many aspects of our culture and the inclusion experience, including accessibility. We have a multi-year program where we have been evolving our approach to self-identification data and analytics. This includes making improvements to the way we collect disability-related data. We have made changes to the surveys and campaign approaches to improve the accuracy of our data and enrich the related insights.

TELUS is committed to having a diverse and inclusive workplace. We collect feedback as a part of our annual Pulsecheck employee engagement survey. In 2022, 91% of team members agreed that TELUS values diversity of thought. 96% of team members believed TELUS respects team members with diverse backgrounds and identities. We have developed a comprehensive five-year plan with five pillars of opportunity to evolve Diversity, Equity, and Inclusion (DEI) at TELUS.

TELUS has a Multi-Year Accessibility Plan as required by Ontario's *Accessibility for Ontarians with Disabilities Act (AODA)*. The AODA applies in respect of certain provincially regulated portions of TELUS in Ontario. TELUS has also voluntarily applied the Multi-Year Accessibility Plan throughout Canada. We regularly review and audit our policies, practices and programs to ensure we are making progress towards inclusion and accessibility.

The Abilities TELUS Resource Group (TRG) is a volunteer organization that supports accessibility within the organization. The group has an active Executive Sponsor and is supported at the executive level. The Executive Sponsor holds a seat on our DEI Advisory Board. This Board consists of representatives from every business area at TELUS. It includes key portfolios where DEI is integrated into the related practices.

The Abilities TRG acknowledges and celebrates a wide range of accessibility awareness days throughout the year. These awareness days raise visibility to issues and concerns impacting people with disabilities.

## Barriers

- Awareness of TELUS' accommodation policy and process is uneven across the organization.
- There may be awareness gaps as it relates to the full range of disabilities.
- Team members with expertise in accessibility may lack visibility across the organization.
- Inconsistent leader awareness of tools, policies, programs and support resources

## Actions

- We will conduct further studies on the current state of the accommodations process at TELUS. This will include raising awareness of the process amongst team members.
- We will evaluate and refine metrics to track the success of workplace accommodation measures.
- We will continue to promote accessibility across the organization. We will ensure that accessibility events, activities, programs and support resources are promoted and available to all employees.
- We will continue to promote and support our Abilities Resource Group. We will work to extend the reach of this Group across TELUS.
- We will continue to partner with disability advocacy organizations to attract candidates of all abilities to our organization.
- We will continue to implement our DEI plan to further our efforts to create a diverse and inclusive workplace for persons with disabilities.

## The built environment

The built environment priority area refers to all TELUS physical spaces under federal jurisdiction. This includes considering accessibility features, such as automated door openers, accessible washrooms, lighting, signage, and noise.

## What we are doing well

TELUS works hard to ensure that our premises are accessible. We have set aside funds for repairs and replacements. We provide multiple ways for people to provide feedback on the accessibility of our physical spaces. We make changes and repairs based on the feedback received.

TELUS has emergency procedures, plans and public safety information available in accessible formats. We have developed individualized emergency response procedures for employees with disabilities. These procedures are communicated to the employees' respective managers and safety personnel. We regularly review and assess workplace emergency response procedures and individualized plans to ensure that new accessibility issues are reviewed and addressed.

TELUS retail stores have taken steps to go beyond meeting minimum accessibility requirements. Some stores are certified as accessible spaces by the [Rick Hansen Foundation](#), which lists TELUS as a [Leader in Rating and Certification](#) and has [certified TELUS Garden in Vancouver](#). Currently, thirty-four stores in British Columbia and twenty-one stores in Ontario have been audited for accessibility by the Rick Hansen Foundation. Learnings from these audits have been communicated to other retail stores.

## Barriers

- TELUS complies with building codes and requirements for physical accessibility in its office spaces. But office spaces are not audited for accessibility beyond meeting minimum codes.
- Interior wayfinding signage at TELUS office locations do not have Braille or tactile considerations.
- Some washrooms at office spaces do not have automated door openers. These features are controlled by the building landlords and not by TELUS.
- TELUS does not have any auditory or visual cues in our offices in the case of an evacuation.

## Actions

- TELUS employees who manage our office spaces will take further training related to accessibility in the built environment.
- TELUS will take steps to audit our office spaces for accessibility. We will consider expanding our partnership with the Rick Hansen Foundation to ensure our spaces are accessible for all.
- TELUS will ensure that all signage and office spaces include accessible wayfinding.
- We will more effectively partner with our landlords to work towards installing automated door opening buttons in all washrooms.
- We will explore the possibility of installing visual and/or auditory alarms in our office spaces.
- We will continue to budget for repairs and replacements related to accessibility.

## Information and communication technologies (ICT)

The ICT priority area relates to the technologies our employees and customers use. This includes hardware, software, assistive devices and all other aspects of technology.

## What we are doing well

At TELUS, we design our websites and apps to meet or exceed the latest accessibility standards. We regularly conduct accessibility reviews. We take steps to ensure that all websites and content conform with Website Content Accessibility Guidelines (WCAG) 2.0 Level AA. We also follow the *Accessibility for Ontarians with Disabilities Act* (AODA) regulations and Canadian Radio-television and Telecommunications Commission (CRTC) requirements (for details see Regulatory [Appendix A](#) and [Appendix B](#)).

We provide direction on accessibility in [TELUS' Brand Resource Centre](#) to all delivery roles (Content, Design, Development, Quality Assurance and Product Owners).

TELUS conducts comprehensive accessibility audits of all wireless devices that it offers for sale to the public. These audits include extensive user testing by persons with disabilities.

All team members at TELUS use Google Workspace, which provides a range of accessibility features. It allows team members to check their documents, emails and communications for accessibility.

## Barriers

- In April 2023, an external vendor reviewed key webpages for meeting certain WCAG 2.1 AA guidelines. The assessment outlined issues and accessibility barriers on those key webpages. This included recommendations to correct missing alternative text on some pages and apply correct heading levels and link descriptions.
- Not all employees are familiar with Google Workspace's accessibility features.
- TELUS can improve its remote-control design to better assist people with limited dexterity.

## Actions

- TELUS will correct issues and accessibility barriers found on our key websites.
- We will consider the user experience of screen reader users. We will make sure that screen reader users have a consistent experience across all key webpages.
- TELUS will provide further training and communications to employees on the accessibility features built into Google Workspace.
- TELUS will listen to feedback on remote controls designs so that it can better address the concerns for those with limited dexterity.

## Communication other than ICT

The Communication priority area relates to communication with employees and customers. This includes print materials and publications. It also includes digital communications such as websites, digital materials and e-newsletters. Presentations and other methods of communication are also covered.

## What we are doing well

Communication is fundamental to the work we do at TELUS. We are committed to meeting the communication needs of persons with disabilities. We demonstrate this commitment through our actions.

The TELUS [accessibility website](#) is a great resource for persons with disabilities. It provides clear, easy to navigate information. We also offer ways for persons with disabilities to provide feedback on accessibility.

The TELUS [Brand Resource Centre](#) has a large section dedicated to accessibility. It offers a wide range of tools and resources to publish accessible communications. We ensure that our colours, language, themes and text have accessibility in mind.

Our social media team follows accessibility guidelines. They write social media posts in plain language. They include alternative text on images and closed captioning on videos. Our social media team also works in partnership with TELUS Resource Groups to create posts for various days of significance for accessibility throughout the year.

At TELUS, we offer our accessible wireless rate plans and other service offerings for persons with disabilities. We provide videos in American Sign Language (ASL) with closed captioning and audio voiceover in accordance with regulatory mandates. We offer alternative formats upon request.

## Barriers

- Not all employees are aware of accessible communication best practices beyond those required by the CRTC.
- TELUS promotes our programs and services for persons with disabilities. But we can do more to create awareness of these programs and services for people who need them.
- There is no central repository for employees where they can find accessibility-related information.

## Actions

- TELUS will consider additional accessible ways to market its products and services to persons with disabilities.
- We will continue to maintain an internal webpage that provides information on accessibility events, activities and resources.
- We will continue to ensure that documents are offered in accessible formats.
- We will continue to ensure our social media content can be accessed by all.

## The design and delivery of programs and services

This priority area focuses on making all programs and services at TELUS accessible to all. It involves thinking about persons with disabilities when programs and services are being created. It also requires us to continuously improve our programs and services for persons with disabilities.

### What we are doing well

- TELUS is committed to providing goods and services in a way that respects the dignity and independence of persons with disabilities.
- We train all public-facing employees to provide excellent customer service to all customers, including those with disabilities. This training covers topics such as rate plans, product options based on customers' needs and applying accessibility discounts.
- TELUS has an Accessible Customer Service Policy and trains employees according to "Best Practices for Serving Customers with Disabilities" guidance documents. We also provide direction on accessibility to our developers, product owners and testers at [Accessibility for Content Creators](#).
- TELUS offers accessible support to customers by telephone. We accommodate customers with service animals or support persons. We provide prompt notification of any

service interruptions or facility issues. We also provide programs and services designed for persons with disabilities. This includes offering extended trial periods, TTY and alternative document formats.

- We welcome feedback from customers, especially from persons with disabilities. We regularly hold focus group sessions with people with disabilities. We conduct consultations with various associations relating to accessibility.
- TELUS has community investment programs benefiting persons with disabilities, including [Tech for Good™](#) and [Internet for Good™](#).

## Barriers

- Some customers expressed a desire for maintaining a more detailed record of customer accessibility challenges on their file that TELUS customer service representatives can access.

## Actions

- TELUS will investigate additional ways to mark a customers' accessibility needs in their file.
- TELUS will continue to engage in ongoing training of customer service representatives. We will consider enhancing such training to ensure that outstanding accessible customer support is provided to every customer receiving support in-store or by phone. This will allow our team to continue to support persons with disabilities in a manner that is respectful and meets their needs.
- We will continue to promote our community investment programs benefiting persons with disabilities.
- TELUS will continue to seek out and review feedback from customers with disabilities to improve our services.

## The procurement of goods, services, and facilities

The Procurement priority area relates to how goods, services, and facilities are purchased by TELUS. This includes the evaluation process leading up to making purchases. It also includes ensuring that all documents related to procurement are accessible and have accessibility considerations in mind.

## What we are doing well

TELUS is taking proactive steps to support diverse suppliers. We have a strong Supplier Diversity Program that aims to provide equal access to suppliers. We are members of the [Supplier Diversity Alliance of Canada](#) (SDAC). The SDAC was founded by various supplier diversity accreditation organizations. The SDAC includes the [Inclusive Workplace & Supply Council of Canada](#) (IWSCC). Our Supplier Code of Conduct states that suppliers are expected to incorporate accessibility design principles in their products or services. TELUS also has a Supplier Due Diligence Program. Diversity is built into our procurement scorecard.

## Barriers

- TELUS has a robust Supplier Diversity Program. Recently, TELUS initiated a corporate membership with the IWSCC. IWSCC supports the inclusion of disability-led and operated organizations as vendors.
- Currently, there is no identified member on the TELUS Procurement team who has specialized training on accessibility in procurement.

## Actions

- TELUS will become a corporate member of the IWSCC. This will help disability-led and operated organizations to be considered as vendors for TELUS.
- We will share our involvement with IWSCC to further promote inclusive procurement practices within the industry.
- We will provide procurement specific accessibility training to our procurement leaders.
- TELUS will review procurement-related documents and contracts to improve accessibility.

## Transportation

TELUS has limited involvement with transportation. Because of this, barriers and actions have not been identified in this priority area. If TELUS becomes more involved with any form of transportation, we will identify barriers and actions in this area.

# GoCo priority areas

## About GoCo

Created by TELUS in 2020, GoCo was born from the merger of six companies. GoCo provides businesses with simple and scalable solutions for unified communications, managed connectivity, and network security across Canada. We offer a fully managed approach that reduces expenditures on IT personnel and equipment. It increases the reliability and performance of the services that our clients offer. GoCo has a business-to-business approach. We have a dedicated team of over 330 employees working in Quebec, Ontario, Alberta, and British Columbia.

## Employment

### What we are doing well

- GoCo is proactive in ensuring the employee application process is accessible. GoCo offers remote interview options and accommodations during all stages of the application process.
- GoCo supports employee accommodation requests during the employee lifecycle.
- GoCo offers training on the Ontario Integrated Accessibility Standards Regulations to all employees.
- GoCo provides flexible work arrangements for employees.

### Barriers

- GoCo employees would benefit from increased accessibility training. Employees do not receive any accessibility training specific to their roles.
- GoCo does not have a process for consulting employees with disabilities. GoCo also does not have a way for employees to provide feedback on accessibility in the workplace.
- GoCo's job postings do not inform candidates that they can receive accommodations during the application process.
- GoCo does not have a documented accommodation process for employees.

### Actions

- GoCo will conduct a review of accessibility training needs within the organization. We will work to offer training based on accessibility best practices.
- GoCo will work to formalize an accessibility feedback and consultation process for employees. We will communicate this to all employees.
- GoCo will state on all job postings that candidates can receive accommodations at all stages of the application process.
- GoCo will leverage the work that TELUS is doing in supporting inclusive recruitment.
- GoCo will work to formalize and document the accommodation request process for employees. GoCo will communicate this process to employees.



## The built environment

GoCo is in the process of merging all physical locations with TELUS. The content presented in this section relates to GoCo's "legacy" physical spaces. The spaces have already merged or will merge with TELUS soon.

### What we are doing well

- GoCo's office space is an open-floor concept. This creates an environment that is easier to move around and navigate. This is helpful for individuals with mobility disabilities.
- GoCo has accommodated all ergonomic requests received from employees.

### Barriers

- Evacuation and emergency procedures do not adequately consider the needs of employees with disabilities at all legacy GoCo locations.
- GoCo legacy locations do not offer wall signs with Braille to assist individuals who are blind or partially sighted.
- A formal process for ergonomic assessments does not currently exist at GoCo.
- GoCo's legacy physical spaces have not been fully audited for accessibility.

### Actions

- GoCo is in the process of merging all physical spaces with TELUS. GoCo will adopt all accessibility practices in place at TELUS in the new shared spaces.

## Information and communication technologies (ICT)

### What we are doing well

- GoCo technicians ensure customers are comfortable with the services provided.
- GoCo works with employees on a case-by-case basis to ensure they have the appropriate ICT required to do their jobs.
- GoCo ensures that all Microsoft Office365 accessibility features are available to employees.

### Barriers

- GoCo has not assessed the website for accessibility against the most current Web Content Accessibility Guidelines (WCAG).
- GoCo does not provide training to employees on how to use the accessibility tools and features available to them.
- GoCo has a website dedicated to accessibility feedback and is developing a website on accessibility.

## Actions

- GoCo will work with TELUS to learn about the resources available for content creators and developers to make the website more accessible.
- GoCo will work to ensure the website aligns with Web Content Accessibility Guidelines (WCAG).
- GoCo will provide training to employees on the accessibility features within programs.
- GoCo will develop an accessibility page for our website. The website will share information about the accessibility of our programs and services.

## Communication other than ICT

### What we are doing well

- GoCo includes alternative text in most forms of online advertising.
- GoCo is working to adopt accessibility best practices, including checking colour contrast and including subtitles on videos.

### Barriers

- There are currently no resources available to employees for creating accessible communications. There are no guidelines on how to check communications for accessibility.
- GoCo does not have formal policies for using plain language, alternative text, and accessible colours on all advertisements.
- GoCo has brand guidelines, but the brand guidelines do not fully consider accessibility.

### Actions

- GoCo will provide accessible communications training to all employees. This training will help ensure employees understand how to make communications accessible. It will also ensure employees consider the needs of persons with disabilities.
- GoCo will learn from communications practices at TELUS to make its communications more accessible for its employees and customers.
- GoCo will develop communication policies that address the use of plain language, alternative text and accessible colours on all branding and advertisements.
- GoCo will review the current brand guidelines to support the needs of persons with disabilities within these guidelines.

## The design and delivery of programs and services

### What we are doing well

- GoCo employees make every effort possible to respond to customers' unique needs.

- GoCo provides a variety of options for customers to receive support including by email, phone, and a customer portal.
- GoCo is responsive to customer concerns. We typically provide responses within 24 hours.

## Barriers

- GoCo does not provide customers with the option to receive documents in alternative formats, such as large text or braille.
- There is currently no way for customers to provide feedback on the accessibility of services at GoCo.

## Actions

- GoCo will investigate if TELUS can support GoCo with providing documents to customers in alternative formats.
- GoCo will offer a feedback mechanism on the website for customers to provide feedback on accessibility.

# The procurement of goods, services, and facilities

## What we are doing well

- The procurement team is supportive of accessibility needs. The team works to procure goods that support the accessibility needs of employees.

## Barriers

- GoCo's procurement team lacks awareness of best practices for accessible procurement.
- GoCo does not have an accessible procurement checklist or an accessible procurement policy.

## Actions

- GoCo will work to offer training to all employees involved in the procurement process. This training will highlight best practices in supporting accessible procurement.
- GoCo will implement a procurement checklist that will ease accessible procurement decisions.
- GoCo will leverage TELUS' updated procurement policies, procedures, and processes that include accessibility considerations.

# Transportation

GoCo has limited involvement with the priority area of transportation. Because of this, barriers and actions have not been identified under this priority area. If GoCo becomes more involved with any form of transportation, barriers and actions will be added to the Accessibility Plan.

# Altima priority areas

## About Altima

TELUS acquired Altima Solutions Limited (“Altima”) in June 2022. Altima Telecom offers broadcasting, Internet and other telecommunications services.

## Employment

Altima currently leverages TELUS’ employment-related policies and processes. The TELUS People and Culture Team is consulted on any employment matters at Altima. Altima follows TELUS’ recruitment, hiring and onboarding practices. Therefore, the barriers and actions identified in the Employment section of the TELUS Accessibility Plan are applicable to Altima.

### Barriers

- Altima employees would benefit from increased accessibility training.

### Actions

- Post-acquisition integration activities include Altima leveraging TELUS’ policies and practices with respect to employee training on disability awareness, accommodations, products and services.

## The built environment

Altima has an office/warehouse in Montreal, as well as an office in Toronto. Most Altima employees work from home.

### Barriers

- Altima’s building spaces have not been fully audited for accessibility.
- While accommodations are provided, a formal process for ergonomic assessments does not exist at Altima.

### Actions

- Altima will explore the possibility of having a built environment assessment done to ensure the accessibility of the building spaces for employees and the public.
- Altima will explore TELUS’ ergonomic assessment process and seek to integrate all accommodations through TELUS’ process.

## Information and communication technologies (ICT)

As Altima becomes more integrated with TELUS, Altima's ICT will align more closely with TELUS. Once fully integrated, Altima will use all of TELUS' ICT infrastructure.

### Barriers

- Altima has not been fully assessed for Web Content Accessibility Guidelines (WCAG) compliance in areas of Altima's website that are not required by the CRTC to conform to Level AA.

### Actions

- Altima will work with TELUS to learn about the resources that are available for content creators and developers. Altima will identify which portions of the website that are not already required by the CRTC to conform to Level AA WCAG can be made more accessible.

## Communication other than ICT

TELUS offers a variety of services to support the accessibility of communications internally as well as externally. As integration continues with TELUS, internal and external communications at Altima will adopt TELUS' accessible communications practices.

### Barriers

- There is an opportunity to explore accessibility within Altima's communications beyond regulatory requirements.

### Actions

- Altima will learn from communications practices at TELUS to make Altima's communications even more accessible for our employees and customers.

## The design and delivery of programs and services

TELUS offers a variety of programs and services to customers to support persons with disabilities. As integration continues with TELUS, Altima will adopt TELUS' programs and services that relate to accessibility.

### Barriers

- Altima could extend alternative format availability to documents beyond what is required by the CRTC.

### Actions

- Altima will explore expanding the suite of alternative formats beyond regulatory requirements.

## The procurement of goods, services, and facilities

Altima is currently in the process of integrating with TELUS. As the integration process continues, Altima's procurement practices will align more closely with TELUS. Once fully integrated, Altima will use all of TELUS' procurement policies, procedures, and processes.

### Barriers

- Altima could improve its procurement process by contemplating accessibility considerations. This includes the use of tools, such as an accessible procurement checklist or accessible procurement policy.

### Actions

- Altima will continue to learn about TELUS' procurement practices and will explore using TELUS' procurement policies, procedures, and processes.

## Transportation

Altima has limited involvement with the priority area of transportation. Because of this, barriers and actions have not been identified under this priority area. If Altima becomes more involved with any form of transportation, barriers and actions will be added to the Accessibility Plan.

# Koodo priority areas

## About Koodo Mobile “Koodo”

Koodo Mobile (“Koodo”) is a TELUS brand that offers postpaid, prepaid, and wireless home phone services.

## Employment

As Koodo is a subsidiary of TELUS, Koodo leverages TELUS’ employment-related policies and processes. For example, if you click on the careers site on the Koodo website, it automatically directs you to the TELUS Careers Page. Koodo’s job postings display the company’s name in brackets beside the job title.

For information on barriers and actions in the Employment priority area for Koodo, please go to [TELUS Employment](#).

## The built environment

As Koodo is a TELUS brand, Koodo and TELUS share office spaces. Retail spaces were not included in the scope of this project and fall under provincial legislation and provincial building code requirements.

For information on barriers and actions in the Built Environment priority area for Koodo, please go to [TELUS Built Environment](#).

## Information and communication technologies (ICT)

While TELUS and Koodo have the same standards and policies for ICT, Koodo has a separate website that is monitored and developed by a separate team.

## What we are doing well

### Web and App Development

Like TELUS, Koodo has an [accessibility website](#). It is a great resource for persons with disabilities. It provides clear, easy to navigate information.

Following TELUS’ standards and policies:

- TELUS provides direction on accessibility to Koodo developers.
- TELUS also outlines the responsibilities of Koodo Product Owners and Product Testers. Koodo ensures that accessibility is part of the end to end (e2e) digital experience.
- Accessibility is considered on Android and iOS apps. Developers are given information and checklists regarding accessibility.

### **AODA-related practices – Koodo website**

Following TELUS' standards and policies as well as the *Accessibility for Ontarians with Disabilities Act (AODA)*:

- Koodo's websites are designed to meet or exceed the latest accessibility standards and best practices. The sites are also reviewed for accessibility.
- Koodo has taken the following steps to make all new websites and content on those sites conform with WCAG 2.0, Level AA:
  - All new Koodo's websites are assessed and evaluated for accessibility to ensure conformance with WCAG 2.0 Level AA.
  - Koodo has adopted internal standards to ensure the public websites are more accessible.
  - AODA compliance has been included as one of the criteria in selecting technology vendors for new website development initiatives.

### **Equipment, software, devices and other tech**

Following TELUS' standards and policies as well as the Canadian Radio-television and Telecommunications Commission (CRTC):

- Koodo complies with all CRTC regulations regarding the accessibility of its products. This includes:
  - Providing alternative formats and accurate captioning on the Koodo website (the Wireless Code of Conduct is provided in ASL).
  - Offering trial periods for services and equipment.
- Koodo has undertaken comprehensive audits of our wireless devices. This allows us to better understand which devices to recommend to users with specific disabilities. These audits have included extensive user testing by persons with disabilities.

## **Barriers**

- Not all team members are familiar with Google Workspace accessibility features and the training on accessibility features provided by Google.

## **Actions**

- Koodo will provide further training for employees on the accessibility features in Google Workspace. This training could either be provided in-house or could utilize Google's pre-existing and readily available training.

## **Communication other than ICT**

While Koodo does have a separate communications team, they follow the same standards and policies as TELUS. For information on barriers and actions in the Communications priority area for Koodo, please go to [TELUS Communication other than ICT](#).



## The design and delivery of programs and services

Koodo and TELUS utilize the same network. They provide the same mobile phone options to their customers. They do offer different cell phone plans and provide separate customer support.

### Action

- Koodo is committed to conducting a full accessibility review of the Design and Delivery of Programs and Services in year one.

For further information on barriers and actions in this priority area for Koodo, please go to [TELUS Design and Delivery of Programs and Services](#).

## The procurement of goods, services, and facilities

Koodo leverages TELUS' procurement policies, processes, and services. For information on barriers and actions in this priority area for Koodo, please go to [TELUS Procurement of Goods, Services and Facilities](#).

## Transportation

Koodo has limited involvement with the priority area of transportation. Because of this, barriers and actions have not been identified under this priority area. If Koodo becomes more involved with any form of transportation, barriers and actions will be added to the Accessibility Plan.

# Mascon by TELUS priority areas

## About Mascon

Mascon Cable Systems was acquired by TELUS in 2017. Mascon by TELUS provides High Speed Internet and TV service to communities in northern Alberta and British Columbia.

## Employment

In January 2017, Mascon by TELUS joined the TELUS family. As a result, Mascon by TELUS leverages TELUS' employment-related policies and processes.

Mascon by TELUS is currently in the process of integrating with TELUS. As Mascon by TELUS becomes more integrated with TELUS, their employment responsibilities will align more closely with TELUS. Once fully integrated, Mascon by TELUS will use all of TELUS' policies, procedures, and processes.

## What we are doing well

- The organizational structure enables accommodation requests and supports for persons with disabilities to be implemented quickly.
- Mascon by TELUS has a process to provide temporary or permanent accommodations to persons with disabilities.
- Mascon by TELUS' Careers webpage states that accommodations are offered during the recruitment process.
- Flexible work arrangements are offered for employees.
- A formal process for accommodations is in place at Mascon by TELUS and follows the TELUS Accommodations Policy and processes.

## Barriers

- There is a lack of accessibility awareness and training at Mascon by TELUS.

## Actions

- Mascon by TELUS will explore the possibility of offering more training to all employees on disability awareness, accommodations, and bias awareness training. To do this, Mascon will leverage training that TELUS offers.

## The built environment

Since the onset of the COVID-19 pandemic, Mascon by TELUS has reduced the number of physical spaces it uses.

### What we are doing well

- All ergonomic requests that have been received from employees have been accommodated.
- The building space has been reviewed for accessibility.

### Barriers

- While accommodations are provided, a formal process for ergonomic assessments does not exist at Mascon.

### Actions

- Mascon by TELUS will explore TELUS' ergonomic assessment process and seek to integrate all accommodations through TELUS' processes.

## Information and communication technologies (ICT)

Mascon by TELUS' current information and communication technologies (ICT) systems are not identical to TELUS'. As Mascon by TELUS becomes more integrated with TELUS in the next three to five years, their ICT will align more closely with TELUS'. Once fully integrated, Mascon by TELUS will use all of TELUS' ICT.

### What we are doing well

- Technicians retrieve equipment from customers who no longer subscribe to Mascon by TELUS services. Although this process will be changing and customers will be encouraged to return their equipment by mail, the option for a technician to retrieve the equipment from the customer's home will still be available.
- Mascon by TELUS technicians ensure that customers are comfortable with the systems installed in their homes and are aware how to use them.
- Mascon by TELUS works with employees on a case-by-case basis to ensure that they have all the ICT required to do their jobs.

### Barriers

- The Customer Relationship Management (CRM) system used by Mascon by TELUS could be more accessible.

### Actions

- Mascon by TELUS will continue to work with employees on a case-by-case basis to ensure that they have access to the systems required to do their jobs. Mascon will provide workarounds as necessary.

## Communication other than ICT

TELUS offers accessibility services to support communications internally as well as externally. As integration continues with TELUS, Mascon by TELUS could provide some of these accessibility services to support communications where possible.

### What we are doing well

- Mascon by TELUS' website has information about TELUS' Internet for Good™ and Tech for Good™ programs that support persons with disabilities.

### Barriers

- Mascon by TELUS could improve its social media posts by including alternative text or captions on videos.
- Mascon by TELUS' website has not been fully assessed for accessibility related to the most current Web Content Accessibility Guidelines (WCAG).

### Actions

- Mascon by TELUS will work with TELUS to learn about the resources and policies that TELUS has available for content creators to make social media posts more accessible.
- Mascon by TELUS will ensure that text in social media posts is written in plain language.
- Mascon by TELUS will work with TELUS to learn about the resources that are available for content creators and developers to make the website more accessible to align with the Web Content Accessibility Guidelines (WCAG).

## The design and delivery of programs and services

TELUS offers accessibility services to customers to help persons with disabilities access and use TELUS products and services. As integration continues with TELUS, Mascon by TELUS hopes to be able to provide some of these accessibility services where possible.

### What we are doing well

- The Connecting Canadians for Good Program helps ensure that everyone has access to technology. This program includes support in the provision of internet services to persons with disabilities.
- Mascon by TELUS employees make every effort possible to respond to customers' unique needs.
- Customers can contact Mascon by TELUS through a variety of different ways including email, phone, and social media.
- Mascon by TELUS mirrors TELUS' go-to-market efforts.

### Barriers

- Mascon by TELUS can extend availability of alternative formats to documents beyond what is required by the CRTC.

## Actions

- Mascon by TELUS will investigate if TELUS could support Mascon with providing customers documents in alternative formats, beyond what is required by the CRTC.

## The procurement of goods, services, and facilities

Mascon by TELUS is currently in the process of integrating with TELUS. As Mascon by TELUS continues towards becoming fully integrated with TELUS, our procurement practices will align more closely with TELUS. Once fully integrated, Mascon by TELUS will use all of TELUS' procurement policies, procedures, and processes.

It is important to note that, given the rural and remote geographical location that Mascon by TELUS operates in, there are procurement limitations. For example, the number of available suppliers from which Mascon by TELUS can procure goods and services is limited in some product and service categories.

## Barriers

- Mascon by TELUS could improve its procurement process by contemplating accessibility considerations. This includes the use of tools, such as an accessible procurement checklist or accessible procurement policy.

## Actions

- Mascon by TELUS will leverage and align with TELUS' procurement policies, procedures, and processes.

## Transportation

Due to Mascon by TELUS limited involvement with transportation, barriers have not been identified under this priority area. Mascon by TELUS commits to ensuring that all aspects of accessibility are being considered. If Mascon by TELUS becomes more involved with any form of transportation, a full accessibility review will be conducted.

# Public Mobile priority areas

## About Public Mobile

Public Mobile is a TELUS brand that offers wireless services throughout Canada. It serves customers online and does not have any retail stores.

## Employment

Public Mobile leverages TELUS' employment-related policies and processes. This includes recruitment, accommodations, and HR procedures. The TELUS team handles these aspects of employment for Public Mobile, ensuring consistency across both organizations. For information on barriers and actions in the Employment priority area for Public Mobile, please go to [TELUS Employment](#).

## The built environment

Public Mobile employees work remotely from their homes and do not occupy any office spaces. Because of this, Public Mobile does not have barriers and actions related to the built environment. If Public Mobile employees require ergonomic assessments, they use TELUS' Ergonomics Policy Program. They seek assistance from the TELUS ergonomic office support team.

## Information and communication technologies (ICT)

While TELUS and Public Mobile have the same standards and policies for ICT, Public Mobile does have a separate website. This website is monitored and developed by a separate team.

## What we are doing well

### Web and App Development

Public Mobile has an [accessibility webpage](#).

Following TELUS' standards and policies:

- TELUS provides direction on accessibility to Public Mobile developers. This includes following HTML5 standards and WAI-ARIA standards to produce well-structured code.
- TELUS also outlines the responsibilities of Public Mobile Product Owners and Product Testers. Public Mobile ensures that accessibility is part of the end to end (e2e) digital experience.
- Accessibility is considered on Android and iOS apps. Developers are given information and checklists regarding accessibility.

### **AODA-related practices – Public Mobile website**

Following TELUS' standards and policies as well as the *Accessibility for Ontarians with Disabilities Act* (AODA):

- Public Mobile's websites are designed to meet or exceed the latest accessibility standards and best practices. The sites are also reviewed for accessibility.
- Public Mobile has taken the following steps to make all new websites and content on those sites conform with WCAG 2.0, Level AA:
  - All new Public Mobile's websites are assessed and evaluated for accessibility to ensure conformance with WCAG 2.0 Level AA.
  - Public Mobile has adopted internal standards to ensure the public websites are more accessible.
- AODA compliance has been included as one of the criteria in selecting technology vendors for new website development initiatives.

### **Equipment, software, devices and other tech**

Following TELUS' standards and policies as well as the Canadian Radio-television and Telecommunications Commission (CRTC):

- Public Mobile complies with all CRTC regulations regarding the accessibility of its products. This includes:
  - Providing alternative formats and accurate captioning on the Public Mobile website (the Wireless Code of Conduct is provided in ASL).
  - Offering trial periods for services and equipment.
- Public Mobile has undertaken comprehensive audits of our wireless devices. This allows us to better understand which devices to recommend to users with specific disabilities. These audits have included extensive user testing by persons with disabilities.

## **Barriers**

- Not all team members are familiar with Google Workspace accessibility features and the training on accessibility features provided by Google.

## **Actions**

- We will provide further training for employees on the accessibility features in Google Workspace. This training could either be provided in-house or could utilize Google's pre-existing and readily available training.

## **Communication other than ICT**

While Public Mobile does have a separate communications team, we follow the same standards and policies as TELUS. For information on barriers and actions in the Communications priority area for Public Mobile, please go to [TELUS Communication other than ICT](#).

## The design and delivery of programs and services

Public Mobile and TELUS utilize the same network. We provide the same mobile phone options to their customers. We do offer different cell phone plans and provide separate customer support.

### Actions

- As Public Mobile differs from TELUS in that they are strictly an MVNO, a full accessibility review of the Design and Delivery of Programs and Services will be conducted in year one.

For information on barriers and actions in this priority area for Public Mobile, please go to [TELUS Design and Delivery of Programs and Services](#).

## The procurement of goods, services, and facilities

Public Mobile leverages TELUS' procurement policies, processes, and services. For example, if a Public Mobile employee requires a new computer, that individual would go through the TELUS procurement office. For information on barriers and actions in this priority area for Public Mobile, please go to [TELUS Procurement of Goods, Services and Facilities](#).

## Transportation

Public Mobile has limited involvement with the priority area of transportation. Because of this, barriers and actions have not been identified under this priority area. If Public Mobile becomes more involved with any form of transportation, barriers and actions will be added to the Accessibility Plan.



# Multiboard Communications Inc.

## priority areas

### About Multiboard Communications Inc.

Multiboard Communications Inc. (a.k.a. “Start”) was acquired by TELUS in 2023 and is now a subsidiary of Altima Solutions Limited. Start provides residential and business internet, phone, and TV services throughout Ontario. Start also offers residential and enterprise end-to-end fibre internet services in London, ON and surrounding areas.

### Employment

#### What we are doing well

- Start is proactive in ensuring that the employee application process is accessible. Start offers remote interview options and accommodations during all stages of the application process.
- Start has a process to provide temporary or permanent accommodations to persons with disabilities. This process has been modeled off best practices outlined by the Canadian Human Rights Commission.
- Start has implemented an “Employees’ Choice” model for most of its employees. This model allows employees the flexibility to work from home. Only employees who need to work on site as part of their role are required to be in person. This model has had positive effects on employee mental health, overall well-being and accessibility.

#### Barriers

- Start does not have a process for employees to provide feedback on accessibility in the workplace.
- Start does not currently have a strategy for actively recruiting persons with disabilities (PWD).

#### Actions

- Start will conduct a review of accessibility training needs within the organization and work to offer more training based on accessibility best practices.
- Start will work to formalize an accessibility feedback process for employees. We will ensure this is communicated to all employees.
- Start will leverage the work that TELUS is doing in supporting inclusive recruitment.

## The built environment

### What we are doing well

- Start's office space is designed with an open-floor concept. This creates an environment that is easier to maneuver and navigate for individuals with mobility impairments or assistive devices.
- Start retrofitted the two-story main office with an elevator to support employees with mobility impairments.
- Start has a dedicated accessible washroom that features braille signage, an automatic door opener and a push button door locking.
- As part of Start's legislated employment equity program review, a built environment assessment for accessibility was conducted in 2019. Start has worked to implement the recommendations put forward in this assessment.

### Barriers

- Evacuation and emergency procedures do not adequately consider the needs of employees with disabilities.
- Currently, there are no wall signs with braille available to assist individuals with visual impairments, aside from on washrooms.

### Actions

- Start will review and update evacuation and emergency procedures to incorporate necessary measures for individuals with disabilities.
- Start will work to implement braille signage throughout the physical spaces to assist in accessible navigation for employees.

## Information and communication technologies (ICT)

### What we are doing well

- Start's internal technology team responds quickly to accommodation requests. The team meets most requests in fewer than five days.
- Accessibility features and the "Ease of Access Center" are enabled on all workstations. This provides employees with a centralized location to adjust their personal accessibility settings.
- The new Start website was screened using auditing software such as SightImprove and Lighthouse to flag and address accessibility concerns.
- Start provides an annual Workplace Credit. Employees can use this to purchase furniture or equipment that works best for them.

## Barriers

- The current customer management system (CMS) can be improved by increasing the number of accessibility features and integration with external systems.

## Actions

- Start is in the process of replacing the legacy CMS system. We will continue to implement a system that supports more accessibility features and allows for greater integration with other systems.
- Start will begin developing a list of all accessibility software and hardware tools that employees can request to support accommodations.

## Communication other than ICT

### What we are doing well

- Start aims for consistent language usage across the organization. We have “Start Speak” that supports employees in using plain language.

## Barriers

- Start could improve the accessibility of its social media posts by including alternative text. Posts are currently not analyzed for accessible colour contrast.
- Start can provide more webpages related to accessibility.
- Start could extend alternative format availability to documents beyond what is required by the CRTC.

## Actions

- Start will work on including social media and brand guidelines updates to include alternative text and colour contrast considerations on future social media posts.
- Start will include a page on the website that links to the TELUS’ accessibility page.
- Once the current CMS is replaced, Start will explore the possibility of making available alternative formats of communications to other forms of communications beyond what is required by the CRTC.

## The design and delivery of programs and services

### What we are doing well

- Start offers customers online “how-to” videos that support flexible self-serve options. These videos include closed captioning.
- Start is launching a new Set Top Box with dial-in remote options. This will allow Start agents to support virtually instead of having to make an in-person visit to a home.

## Barriers

- Start could improve its online ordering process by making it more available to all products.
- Start can improve the accessibility of its chat function.

## Actions

- Start will work on improving its online ordering systems by increasing product availability for online purchasing.
- Start will look to expand communications options to have 24/7 chat available as well as SMS text options.

# The procurement of goods, services, and facilities

## Barriers

- Start could improve its procurement process by contemplating accessibility considerations. This includes the use of tools, such as an accessible procurement checklist or accessible procurement policy.
- Start could improve the awareness among its procurement team regarding best practices for accessible procurement.

## Actions

- Start will continue to learn more about TELUS' procurement practices. We will use TELUS' knowledge on accessible procurement to improve processes that support accessibility.
- Start will work to offer training to all employees involved in the procurement process. This training will highlight best practices in supporting accessible procurement.

# Transportation

Due to Start's limited involvement with transportation, barriers have not been identified under this priority area. Start commits to ensuring that all aspects of accessibility are being considered. If Start becomes more involved with any form of transportation, a full accessibility review will be conducted.

# Required headers for regulated entities

The information in the following section applies to all TELUS regulated entities and brands as identified in the Introduction section above. As required by section 42(1) and section 51(1) of the ACA, TELUS has set out information relating to the following headers:

The identification and removal of barriers, and the prevention of new barriers as it relates to ICT, procurement of goods and services, design and delivery of program and services, and communication other than ICT as required in 42(1)(a) and 51(1)(a) of the ACA

Please see priority areas above for policies, programs, practices and services in relation to the identification and removal of barriers, and the prevention of new barriers, in the areas of:

- Information and communication technologies (ICT);
- The Procurement of Goods, Services and Facilities;
- The design and delivery of programs and services; and
- Communication, Other than ICT as it relates to the Procurement of Goods, Services and Facilities, the Design and Delivery of Programs and Services, and employment equity where applicable.<sup>2</sup>

## Conditions of licence issued under Part II of the Broadcasting Act as it relates to barriers

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 as it relates to barriers

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 as it relates to barriers

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](#).

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<sup>2</sup> Please see Communication other than ICT sections.

Conditions imposed under section 24 or 24.1 of the Telecommunications Act as it relates to barriers

Licence 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 as it relates to barriers

Conditions that relate to the identification and removal of barriers and the prevention of new barriers are set out in [Appendix B](#).

# Reporting and implementation

The *Accessible Canada Act* (ACA) requires that TELUS publish annual progress reports.

These progress reports will share the work we are doing to implement the actions described in this Plan. TELUS will also publish updated accessibility plans every three years as required by the ACA.

Persons with disabilities will always be involved in the creation of progress reports and new accessibility plans at TELUS. We will continue to identify barriers to accessibility at TELUS.

We will keep taking action to remove barriers and become a leader in accessibility for persons with disabilities.

# 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 TELUS’ 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 TELUS’ 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 TELUS’ 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>3</sup> or expectations/encouragements, which do not meet the threshold for mandatory conditions for the provision of services.

## Accessibility requirements – Broadcasting distribution undertakings (BDUs)

### Distribution of programming services

- **Mandatory distribution:** In the small and first-tier basic package, BDUs are required to distribute certain programming services, including AMI-Audio and AMI-TV in Anglophone markets,<sup>4</sup> and AMI-télé in Francophone markets.<sup>5</sup> This applies to licensed BDUs,<sup>6</sup> as well as exempt BDUs with more than 2,000 subscribers.<sup>7</sup>

### Closed captioning (CC), audio description (AD), and described video (DV)

- **Pass through of CC, AD, and DV:** BDUs cannot alter or delete the content or format of a programming service in a licensed area in the course of its distribution, except in

<sup>3</sup> According to the Accessible Canada Act (S.C. 2019, c. 10), section 42(6).

<sup>4</sup> Broadcasting Order CRTC 2018-320, *Distribution of AMI-audio by licensed broadcasting distribution undertakings*, 27 August 2018; Broadcasting Order CRTC 2018-321, *Distribution of AMI-tv by licensed broadcasting distribution undertakings*, 27 August 2018.

<sup>5</sup> Broadcasting Order CRTC 2018-322, *Distribution of AMI-télé by licensed broadcasting distribution undertakings*, 27 August 2018.

<sup>6</sup> *Broadcasting Distribution Regulations*, SOR/97-555, s. 17(1)(g) [“BDRs”].

<sup>7</sup> Appendix to Broadcasting Regulatory Policy CRTC 2017-319 and Broadcasting Order CRTC 2017-320, *Terms and conditions of the exemption order for terrestrial broadcasting distribution undertakings serving fewer than 20,000 subscribers*, 31 August 2017, para. 15 [“Appendix to BRP 2017-319 and BO 2017-320”].



specified circumstances.<sup>8</sup> This means that content with existing CC, AD, and DV cannot be altered or deleted unless permitted under specified circumstances.<sup>9</sup>

- **Community channels:** TELUS' licensed BDUs must provide AD for all key elements of information programs, including news programming,<sup>10</sup> and the necessary training to hosts and access producers associated with its community programming concerning the provision of audio description.<sup>11</sup>

## Equipment that supports accessibility

- **Make available accessible technology where available and compatible:** Licensed BDUs must make available to their subscribers such equipment, software or other technology that will allow any individual who is blind, visually impaired or who has fine motor skills disabilities to identify and have access to its programming services – including programs with described video – if that equipment, software or other technology is available for purchase by the licensee and is compatible with its distribution system.<sup>12</sup>
- **Accessing DV:** TELUS' licensed BDUs must provide one or more simple means of accessing described programming, whether in open or embedded format, that requires little to no visual acuity.<sup>13</sup>
- **Annual returns with the CRTC:** TELUS' licensed BDUs must submit an annual return to the CRTC information relating to:
  - the availability of accessible set-top boxes and remote controls, and their accessibility features;
  - the penetration of accessible set-top boxes and remote controls with the licensee's customer base; and
  - the number of accessibility-related queries received by the licensee, and the number successfully resolved.<sup>14</sup>
- **Trial periods:**
  - When a customer who self-identifies as a person with a disability or who indicates that a member of the household to which the service is to be provided has a disability accepts an agreement, TELUS' licensed and affiliated BDUs<sup>15</sup> must offer the customer a trial period lasting a minimum of 30 calendar days from the date the service begins<sup>16</sup> to enable the customer to determine whether the service and equipment meet their needs.<sup>17</sup>
  - During the trial period, customers may cancel their agreement without penalty, installation fees or early cancellation fees if they have returned any gift with

<sup>8</sup> BDRs, s. 7; see also Broadcasting and Telecom Regulatory Policy CRTC 2009-430, *Accessibility of telecommunications and broadcasting services*, para. 117 ("BTRP 2009-430").

<sup>9</sup> See for example, Appendix to BRP 2017-319 and BO-320, para 11(f).

<sup>10</sup> Appendix 1 to Broadcasting Decision CRTC 2018-267, *Terms, conditions of licence and expectations applicable to all terrestrial broadcasting distribution undertakings renewed in this decision*, 2 August 2018, para. 6 ("Appendix 1 to BD 2018-267"); Appendix to Broadcasting Decision CRTC 2019-230, *Terms, conditions of licence and expectations for the terrestrial broadcasting distribution undertakings serving Baie-Comeau, Montmagny, Mont-Tremblant, Sainte-Marie, Saint-Georges and Sept-Îles, and their surrounding areas*, Quebec, 28 June 2019, para. 6 ("Appendix to BD 2019-230").

<sup>11</sup> Appendix 1 to BD 2018-267, para. 7; Appendix to BD 2019-230, para. 8.

<sup>12</sup> BDRs, s. 7.3.

<sup>13</sup> Appendix 1 to BD 2018-267, para. 8; Appendix to BD 2019-230, para. 9.

<sup>14</sup> Appendix 1 to BD 2018-267, para. 5; Appendix to BD 2019-230, para. 6.

<sup>15</sup> See Broadcasting Regulatory Policy CRTC 2016-1, *The Television Service Provider Code*, 7 January 2016; Appendix to BRP 2017-319 and BO 2017-320, para. 27.

<sup>16</sup> *The Television Service Provider Code, simplified*, provision VIII.2 ("TVSP Code"). Compliance with the TVSP Code is required pursuant to Appendix 1 to BD 2018-267, para. 2; Appendix to BD 2019-230, para. 2; Appendix to BRP 2017-319 and BO 2017-320, para. 27.

<sup>17</sup> TVSP Code, provision VIII.1.

purchase and equipment provided by TELUS' licensed or affiliated BDUs in near-new condition, including the original packaging, if applicable.<sup>18</sup>

## Related to customer service

- **Alternative formats:**

- TELUS' licensed and affiliate BDUs must provide a customer a copy of the agreement in alternative format for people with disabilities upon request, at no charge, at any time during the commitment period.<sup>19</sup>
- TELUS' BDUs, including affiliate BDUs, must ensure that the Critical Information Summary of an agreement can be provided in an alternative format for people with disabilities upon request at no charge.<sup>20</sup>
- A person with a disability or their designated representative may request that a party, including TELUS, whose documents are posted on the CRTC's website file the document with the CRTC in the alternative format specified by the person or representative. The request must be served on the party within five days after the day on which the document was posted.<sup>21</sup>
- Accessibility plans, progress reports, and descriptions of feedback processes published under the *Accessible Canada Act* must be made available, upon receipt of a compliant request,<sup>22</sup> 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>

- **Call centres:**

- TELUS' licensed BDUs must make its general call centres accessible to the point of providing reasonable accommodation to persons with disabilities by:
  - training customer service representatives in handling enquiries from persons with disabilities and familiarizing them with the service provider's products and services for persons with disabilities; and
  - making its Interactive Voice Response systems accessible.<sup>24</sup>

- **Customer service functions (not available over website):**

- Where customer service functions on its website are not accessible, TELUS' licensed BDUs must ensure that persons with disabilities do not incur a charge or otherwise be disadvantaged if they use an alternate avenue of customer service.<sup>25</sup>

- **Promotion of disability-specific products:**

- TELUS' licensed BDUs must promote information on all of its disability-specific services and products, in an accessible manner(s) of TELUS' choice.<sup>26</sup>

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<sup>18</sup> *Ibid*, provision VIII.3.

<sup>19</sup> *Ibid*, provision VII.3.

<sup>20</sup> *Ibid*, provision IX.4.d.

<sup>21</sup> *Canadian Radio-television and Telecommunications Commission Rules of Practice and Procedure*, SOR/2010-277, s. 14(1) ("CRTC Rules of Practice and Procedure").

<sup>22</sup> *Canadian Radio-television and Telecommunications Commission Accessibility Reporting Regulations*, SOR/2021-160, s. 8(2), 11(2), 15(2) ("CRTC Accessibility Reporting Regulations").

<sup>23</sup> *Ibid*, s. 8(1), 11(1), 15(1).

<sup>24</sup> Appendix 1 to BD 2018-267, para. 14; Appendix to BD 2019-230, para. 15.

<sup>25</sup> Appendix 1 to BD 2018-267, para. 12; Appendix to BD 2019-230, para. 13.

<sup>26</sup> Appendix 1 to BD 2018-267, para. 9; Appendix to BD 2019-230, para. 10.

## Website accessibility

- **Accessibility section on website:** TELUS' licensed BDUs must incorporate an easy-to-find home page link to the sections of its website dealing with the needs of persons with disabilities, if its website includes such sections.<sup>27</sup>
- **Making information on website accessible:**
  - TELUS' licensed BDUs must make information on its website accessible to the point of providing reasonable accommodation for persons with disabilities.<sup>28</sup>
  - Accessibility plans, progress reports, and descriptions of feedback processes published under the ACA must be published in a way that meets Web Content Accessibility Guidelines (WCAG) guidelines.<sup>29</sup>
- **Customer service functions (solely available over website):**
  - TELUS' licensed BDUs shall make accessible any customer service functions that are available solely over its website.<sup>30</sup>

## Accessibility requirements – Programming undertakings, including on-demand services

### CC, AD, and DV

- **Offering CC:**
  - TELUS' licensed on-demand services must caption 100% of the English- and French-language programs in its inventory, with the exception of community access television programming.<sup>31</sup>
  - TELUS' licensed on-demand services 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>32</sup>
  - TELUS' licensed on-demand services must meet a required quality of captioning for its French-language services and English-language services.<sup>33</sup> These quality standards include, among other things, lag time and accuracy.<sup>34</sup>

<sup>27</sup> Appendix 1 to BD 2018-267, para. 10; Appendix to BD 2019-230, para. 11.

<sup>28</sup> Appendix 1 to BD 2018-267, para. 11; Appendix to BD 2019-230, para. 12. See para. 66 of BTRP 2009-430 for examples of reasonable accommodation.

<sup>29</sup> CRTC Accessibility Reporting Regulations, s. 5, 10, 14.

<sup>30</sup> Appendix 1 to BD 2018-267, para. 13; Appendix to BD 2019-230, para. 14.

<sup>31</sup> Appendix to Broadcasting Regulatory Policy CRTC 2017-138, *Standard conditions of licence, expectations and encouragements for on-demand services*, 10 May 2017, para. 21 ("Appendix to BRP 2017-138"). Captioning must be consistent with the approach set out in Broadcasting Public Notice CRTC 2007-54, *A new policy with respect to closed captioning*, 17 May 2007.

<sup>32</sup> Appendix to BRP 2017-138, para. 22. The monitoring system must be consistent with BRP 2009-430.

<sup>33</sup> Appendix to BRP 2017-138, para. 23. For French-language services, the quality standards of captioning must adhere to requirements set out in Appendix to Broadcasting Regulatory Policy CRTC 2011-741-1, *French-language Closed Captioning Mandatory Quality Standards*, 21 February 2012, as amended from time to time ("Appendix to BRP 2011-741-1"). For English-language services, the quality standards of captioning must adhere to requirements set out in Appendix Broadcasting Regulatory Policy CRTC 2016-435, *English-language closed captioning mandatory quality standards*, 2 November 2016, as amended from time to time ("Appendix to BRP 2016-435").

<sup>34</sup> For more details, please see Appendix to BRP 2011-741-1 and Appendix to BRP 2016-435.

- **Filing reports with the CRTC**

- **Community channels:** TELUS' licensed on-demand services must keep, in a form acceptable to the CRTC, a program log or a record of programs offered as local expression in the licensed area and retain the log or record for a period of one year after the latest date on which the program is offered. The program log or record of programs must include information for each program including whether the program was offered with closed captioning, audio description or described video.<sup>35</sup>
- **All other on-demand programs:** TELUS' licensed on-demand services must maintain for a period of one year and submit to the CRTC upon request a detailed list of the programming available on the service. The list must identify information including whether captioning and/or video description is available.<sup>36</sup>

#### Alternative formats

- A person with a disability or their designated representative may request that a party, including TELUS, whose documents are posted on the CRTC's website file the document with the CRTC in the alternative format specified by the person or representative. The request must be served on the party within five days after the day on which the document was posted.<sup>37</sup>
- Accessibility plans, progress reports, and descriptions of feedback processes published under the ACA must be made available, upon receipt of a compliant request,<sup>38</sup> 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>39</sup>

#### Website accessibility

- Accessibility plans, progress reports, and descriptions of feedback processes published under the ACA must be published in a way that meets Web Content Accessibility Guidelines (WCAG) guidelines.<sup>40</sup>

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<sup>35</sup> Appendix to BRP 2017-138, paras. 20(a) and 20(b)(vii).

<sup>36</sup> Appendix to BRP 2017-138, para 24.

<sup>37</sup> CRTC Rules of Practice and Procedure, s. 14(1).

<sup>38</sup> CRTC Accessibility Reporting Regulations, s. 8(2), 11(2), 15(2).

<sup>39</sup> *Ibid*, s. 8(1), 11(1), 15(1).

<sup>40</sup> CRTC Accessibility Reporting Regulations, s. 5, 10, 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 TELUS 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 TELUS.

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>41</sup> or expectations/encouragements, which do not rise to the level of imposed conditions.

## 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>42</sup>
- WSPs are required to provide IP Relay services 24 hours a day, seven days a week.<sup>43</sup>
  - MRS providers providing IP Relay and MRS providers with an obligation to provide TTY must meet the minimum requirements.<sup>44</sup>
  - Certain TSPs must file annual reports on quality of service data, as set out in Appendix 2 to TRP 2018-466.<sup>45</sup>
- WSPs must take, or maintain, necessary steps<sup>46</sup> to ensure 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, especially in regards to reaching public safety services. This applies to plans with both soft and hard data caps.<sup>47</sup>
- TSPs are required to fund video relay service nationally via the existing National Contribution Fund.<sup>48</sup>

<sup>41</sup> According to the *Accessible Canada Act* (S.C. 2019, c. 10), section 51(6).

<sup>42</sup> Broadcasting and Telecom Regulatory Policy CRTC 2009-430, *Accessibility of telecommunications and broadcasting services* ("BTRP 2009-430"), para 11 and 21.

<sup>43</sup> Telecom Regulatory Policy CRTC 2018- 466 ("TRP 2018-466"), *Review of the regulatory framework for text-based message relay services*, para 31.

<sup>44</sup> TRP 2018-466, para 153 and 156 Appendix 1.

<sup>45</sup> *Ibid.*, paragraph 163 and Appendix 2.

<sup>46</sup> This could include, for unlimited plans with a soft cap, zero-rating VRS data and ensuring that the service is not throttled when a VRS user reaches their soft data cap.

<sup>47</sup> Telecom Regulatory Policy CRTC 2023-41, *Mobile wireless service plans that meet the needs of Canadians with various disabilities*, ("TRP 2023-41"), paras 93-94, 146.

<sup>48</sup> Telecom Regulatory Policy CRTC 2014-187 (TRP 2014-187), *Video Relay Service*, para 32.

## Emergency 9-1-1 service, including text messaging to 9-1-1, notification and consent requirements

- Voice over Internet Protocol (“VoIP”) service providers, prior to commencement of VoIP services, must obtain the customer’s express consent by which the customer acknowledges his/her understanding of the 9-1-1/E9-1-1 service limitations, and any printed information used to secure the express customer consent must be provided in alternative formats (e.g., Braille and large print), upon request.<sup>49</sup> Furthermore, to ensure that such documentation is accessible to persons with cognitive disabilities, local VoIP service providers are required, at a minimum, to explain it, upon request.<sup>50</sup>
- MRS providers must provide access to 9-1-1 service.<sup>51</sup>
- WSPs and incumbent local exchange carriers (ILECs) must provide Text with 9-1-1 service.<sup>52</sup>

## Alternative formats

- Canadian carriers, must provide, upon request, billing statements and billing inserts in alternative formats, like Braille, large print or on computer diskette.<sup>53</sup> Additionally the Canadian carrier must provide billing information in any other alternative format(s) mutually agreed upon with its visually impaired customer.<sup>54</sup>
- Canadian carriers must also provide information about rates, terms, and conditions of all services, including those offered on a promotional basis, in alternative formats, upon request of subscribers or potential subscribers who are visually impaired.<sup>55</sup> Canadian carriers must include in their contracts with resellers a condition that resellers comply with the same obligations imposed on Canadian carriers.<sup>56</sup>
- ILECs/TSPs 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>57</sup>
- WSP and ISPs are required to provide wireless service contracts and Internet service contracts in alternative formats for people with disabilities upon request and at no charge.<sup>58</sup>
- TSPs must provide paper bills upon request at no charge to customers who self-identify as a person with a disability.<sup>59</sup>

<sup>49</sup> Telecom Decision 2005-21 (“TD 2005-21”), *Emergency service obligations for local VoIP service providers*, para 98.

<sup>50</sup> TD 2005-21, para 98.

<sup>51</sup> Telecom Order CRTC 98-626 (“TO 98-626”); TD 2002-13, *Extending the availability of alternative formats to consumers who are blind*; and, TO 2001-690, *Alternative formats for a person who is blind*.

<sup>52</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>53</sup> TO 98-626, para 14 and *Revised regulatory requirements to provide information to customers*, Telecom Regulatory Policy CRTC 2009-156 (“TRP 2009-156”), para 78.

<sup>54</sup> TO 98-626, para 14.

<sup>55</sup> TRP 2009-156, para 78.

<sup>56</sup> TRP 2009-156, para 78.

<sup>57</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*, para 11.

<sup>58</sup> *The Wireless Code*, Telecom Regulatory Policy CRTC 2013-271 (“TRP 2013-271”), para 336, and *The Internet Code*, Telecom Regulatory Policy CRTC 2019-269 (“TRP 2019-269”), para 212, Appendix B.4.i.

<sup>59</sup> Telecom and Broadcasting Decision CRTC 2022-28, *When and how communications service providers must provide paper bills*.

- 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>60</sup>

## 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>61</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>62</sup>
- TSPs must have easy-to-find home page link to the special needs/disability sections of their websites.<sup>63</sup>
- WSP are required to maintain websites that meet the [Web Content Accessibility Guidelines](#) ("WCAG") of the World Wide Web Consortium (W3C).<sup>64</sup>
- Electronic publication of feedback description processes, progress reports and accessibility plans created pursuant to ACA will also be required to meet the requirements of Level AA conformance set out in the WCAG.<sup>65</sup>

## Trial period

- WSP are required to provide a 30-calendar day trial period for customers with disabilities and this information is required to be promoted on the accessibility portion of the WSP's website.<sup>66</sup>
- ISPs subject to the Internet Code must provide a 30-calendar day (minimum) trial period for customers who self-identify as having a disability.<sup>67</sup>
- Specifically for Internet services, the CRTC requires ISPs to produce videos in ASL/LSQ in their Internet Code awareness campaigns and to include in the videos information regarding the trial period to enable Canadians with disabilities to better understand and avail themselves of the extended trial periods.<sup>68</sup>

<sup>60</sup> CRTC Accessibility Reporting Regulations (SOR/2021-160) (the "Regulations"), s. 24, s.27, and s.31.

<sup>61</sup> BTRP 2009-430, paragraph 65.

<sup>62</sup> BTRP 2009-430, para 68.

<sup>63</sup> BTRP 2009-430, para 57.

<sup>64</sup> Modern telecommunications services – The path forward for Canada's digital economy, Telecom Regulatory Policy CRTC 2016-496 ("TRP 2016-496"), para 217.

<sup>65</sup> Call for comments – The Canadian Radio-television and Telecommunications Commission Accessibility Reporting Regulations, Telecom and Broadcasting Notice of Consultation 2021-69 ("TBNC 2021-69"), para 46 and the Regulations, s. 5(c), 10(1)(c), 14(c), 21(c), 26(1)(c), and 30(c).

<sup>66</sup> TRP 2013-271, paras 251, 332 and 336 and section G.4.iv of the Wireless Code.

<sup>67</sup> TRP 2019-269, para 380.

<sup>68</sup> TRP 2019-269, para 374 and para 466.

## Facilitation of cancellations and customer transfer

- While there are no special requirements with respect to cancellation of service or customer transfer for vulnerable customers, the CRTC mandate to facilitate customer initiated cancellation of services and customer transfer requests are all encompassing and robust. These requirements make it convenient for all customers of local voice services, wireless services, Internet services, and broadcasting distribution services to cancel their services and transfer to another provider of their choosing at any time.<sup>69</sup>
- If a customer cancels a contract before the end of the commitment period, as a WSP and ISP, TELUS must not charge the customer any fee or penalty other than the early cancellation fee, the limits of which are set out in the Wireless Code and the Internet Code.<sup>70</sup>
- As a condition of offering and providing telecommunications services, TELUS and all Canadian carriers (including wireless carriers) are required to accept a customer cancellation request from a prospective new service provider, on behalf of a customer.<sup>71</sup>
- The above noted rules for cancellation of services and transfer to a different service provider make it very easy and inexpensive for changing plans and/or providers and usually the customer does not even need to contact the service provider. The vulnerable population benefits from these rules as they simplify the cancellation or transfer process.

## Promotion of products and services and training

- WSPs must offer mobile wireless service plans that meet the needs of Canadians with disabilities (including those who are hard of hearing and visually impaired) and plans and services must be advertised on WSPs' website.<sup>72</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>73</sup>
- As of 2023, WSPs must annually report on the total number of subscribers to accessible plans and the composition of accessible plans available in the market in the course of the year, including any plans that have been withdrawn from the market during that period and the reason for doing so.<sup>74</sup>
- All ISPs must provide account management tools that enable customers to monitor their data usage (and these tools must be accessible to customers with disabilities) at no charge.<sup>75</sup>
- Large facilities-based ISPs are required to work together to create and promote common terminology sign language videos in American Sign Language/Langue des signes québécoise (ASL/LSQ), in consultation with the Deaf, deaf-blind, and hard-of-hearing ("DDBHH") community. The video must also include closed captioning.<sup>76</sup>

<sup>69</sup> Broadcasting and Telecom Regulatory Policy CRTC 2014-576 ("BTRP 2014-576"), para 40 and 43, and Section G.5. of the Wireless Code.

<sup>70</sup> Telecom Regulatory Policy CRTC 2017-200, *Review of the Wireless Code*, TRP 2017-200, para 172 and TRP 2019-269, para 351.

<sup>71</sup> *The customer transfer process and related competitive issues*, Broadcasting and Telecom Regulatory Policy CRTC 2011-191 ("BTRP 2011-191"), para 2, 3, 27, and 33.

<sup>72</sup> TRP 2016-496 para 212 and 214.

<sup>73</sup> BTRP 2009-430, para 44.

<sup>74</sup> TRP 2023-41, para 143.

<sup>75</sup> TRP 2019-269, para 300.

<sup>76</sup> TRP 2019-269, para 164.



- Specifically, with respect to call centers, the CRTC mandated TSPs to make their general call centers accessible to the point of providing a reasonable accommodation to persons with disabilities by:
  - training customer service representatives in handling enquiries from persons with disabilities, and familiarizing them with the service providers' products and services for persons with disabilities; and
  - making Interactive Voice Response systems<sup>77</sup> accessible.<sup>78</sup>
- Regarding promotion of disability specific information, the CRTC requires:
  - TSPs to promote information on all of their disability specific services and products in the accessible manner(s) of their choice;<sup>79</sup>
  - if the TSPs offers a website with special needs/disability sections, TSPs to incorporate an easy-to-find home page link to the special needs/disability sections of their websites;<sup>80</sup> and
  - WSPs and large facilities-based ISPs are required to produce sign language videos in ASL and LSQ to promote awareness on the Wireless Code and the Internet Code, explain common terminology used in contracts, and inform customers about methods to manage data.<sup>81</sup>
- 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>82</sup>

## Annual consultation requirements for wireless service providers

- WSPs must engage in regular, at least yearly, consultations with persons with disabilities and groups representing their interests.<sup>83</sup>

<sup>77</sup> An Interactive Voice Response system is a technology that allows a computer to detect voice and touch tones using a normal phone call and replaces customer service representatives for the portion of the phone call that uses the system.

<sup>78</sup> BTRP 2009-430, para 69.

<sup>79</sup> BTRP 2009-430, para 56, reaffirmed in TRP 2016-496, para 205.

<sup>80</sup> BTRP 2009-430, para 57.

<sup>81</sup> TRP 2017-200, paras 378, 382, and TRP 2019-269, paras 164, 468.

<sup>82</sup> TRP CRTC 2019-269, paragraph 463.

<sup>83</sup> TRP 2023-41, para 142.