

November 19, 2025

Mr. Marc Morin
Secretary General
Canadian Radio-television and Telecommunications Commission
1 Promenade du Portage
Gatineau, QC
K1A 0N2

By: Email

Dear Mr. Morin:

Subject: **Procedural Request to Reopen CRTC 2025-94 (Ontario Library Association)**
(Public record: 1011-NOC2025-0094)

1. The Canadian Telecommunications Association (“CTA”) is in receipt of the procedural request from the Ontario Library Association (“OLA”) as circulated via email on November 15, 2025.
2. CTA is also aware of documents filed via email by Canada Deaf Grassroots Movement on November 16, 2025, and Deaf Wireless Canada Committee on November 18, 2025, supporting the OLA request. We also have reviewed the supplemental reply from Rogers, made in accordance with CRTC 2025-94-1, in which it also asked the Commission to deny the procedural request from OLA in its entirety.
3. CTA is submitting these comments on behalf of our Members and note that we fully support Rogers call for the denial of OLA’s request for the reasons cited in Rogers’ Reply comments at paragraphs 9-14:

9. Finally, in reviewing the record of the procedural requests filed in BTNC 2025-94, Rogers came across the Ontario Library Association’s (OLA) “procedural request” dated November 5, 2025. In its seventeen-page submission, OLA asked the Commission “to Reopen Consultation to enable the Ontario Library Association and other intervenors to provide a Final Comments stage.”¹ In this submission, OLA

¹ OLA Procedural Request, 5 Nov 2025, p.1.

advanced a series of substantive and highly problematic policy recommendations that it failed to make in its intervention, including a proposed premium to public interest cost claims and the removal of any role for respondent companies to challenge cost claims of public interest intervenors. The procedural request was made nearly six months after the Notice was published, two months after the intervention deadline, and one month after the original reply deadline. OLA did not serve its procedural request on Rogers, or on other parties to this proceeding, to our knowledge, until Saturday, November 15, 2025 – two days before the amended reply deadline.

10. Rogers urges the Commission to deny OLA’s procedural request in its entirety. What OLA characterizes as a procedural matter is in fact an attempt to circumvent the Commission’s established consultation process and introduce substantive policy proposals well beyond the deadlines applicable to all participants. Rogers notes that in TBNC 2025-94-1, the Commission clarified that the supplemental reply period is intended to allow parties to supplement existing replies and comment on issues raised during the intervention period, not the reply period. OLA’s proposals relate directly to the central issues in BTNC 2025-94 and represent precisely the type of submissions that were required to be filed during the intervention period, which closed on September 9, 2025. These are not responsive comments to issues raised by other parties during the intervention phase, nor do they address matters that could not have been anticipated when the Notice was issued on May 12, 2025. They are original, fully-formed policy proposals that OLA failed to advance in compliance with the Commission’s procedural requirements. By introducing major new policy proposals two months after the intervention deadline, and without properly serving other parties until the eve of the supplemental reply deadline, OLA has denied Rogers and other participants the opportunity to meaningfully respond. This is particularly prejudicial where OLA’s proposals would fundamentally alter the rights and obligations of cost respondents.

11. OLA’s conduct – like that of PIAC – demonstrates a fundamental disregard for the Commission’s Rules of Practice and Procedure and the basic principles of procedural fairness that govern Commission proceedings. The intervention period exists to ensure that all parties have a fair opportunity to understand positions advanced by others, respond to those positions, and allow the record to close so that the Commission can make informed decisions based on complete and balanced evidence. This procedural structure is not a mere formality but a

safeguard that protects the integrity of the CRTC's proceedings and ensures fairness to all participants.

12. If parties are permitted to disregard intervention deadlines and advance new substantive proposals through ad hoc procedural requests filed at their discretion, the entire consultation framework becomes meaningless. This approach creates unfairness by allowing non-compliant parties to gain advantage over those who respect the Commission's timelines. It also creates uncertainty and inefficiency by preventing proceedings from closing as scheduled, with no principled basis to refuse subsequent requests to reopen the record for still further proposals from other parties who missed deadlines.

13. While Rogers supports the Commission's worthwhile objectives in BTNC 2025-94, particularly the goal of encouraging broader participation in Commission proceedings, it remains essential that the Commission hold all parties to the same procedural standards. Reducing barriers to participation does not require the Commission to abandon orderly, efficient, regulatory proceedings, nor does it justify a departure from fundamental procedural safeguards that ensure fairness to all parties. The Commission can pursue its accessibility objectives while requiring all participants to adhere to the same basic procedural requirements, including the need to respect the same deadlines.

14. Accordingly, to ensure the continued integrity of the Commission's proceedings and procedures, Rogers urges the Commission to deny OLA's procedural request in its entirety. The Commission should not reopen the consultation, should not accept OLA's untimely policy proposals as part of the record, and should not permit OLA to file its November 5 letter as a supplemental reply further to BTNC 2025-94-1. To do otherwise would be unfair to Rogers and other parties who have complied with the Commission's procedural requirements, would undermine the integrity of this proceeding, and would establish a harmful precedent that would compromise the fairness and efficiency of future Commission consultations.

4. The Commission clearly indicated within its changes to procedure, that it would only allow for comments to be provided in relation to items put on record during the

intervention period and that “[a]ny comments that address matters raised in the reply period will not be considered.”²

5. The OLA submission intentionally looks to circumvent the direction provided by the Commission by identifying new concepts tangentially via this procedural request. Permitting parties to bypass intervention deadlines and advance new substantive proposals under the guise of a procedural request results in unfairness, uncertainty, and inefficiency, and erodes the integrity of the consultation process.
6. CTA is of the view that there has been sufficient time dedicated to ensuring participants have been able to put forth their respective positions and recommendations. CTA submits that the Commission should not reopen the consultation and that this additional procedural request and its contents should be disregarded in full.

Kind regards,



Ursula Grant,
VP Industry and Consumer Affairs

² Broadcasting and Telecom Notice of Consultation CRTC 2025-94-1, Call for comments – A new approach to funding public interest participation in Commission proceedings – Changes to procedure, at paragraph 10.