



Cogeco Accessibility Plan

2023-2026

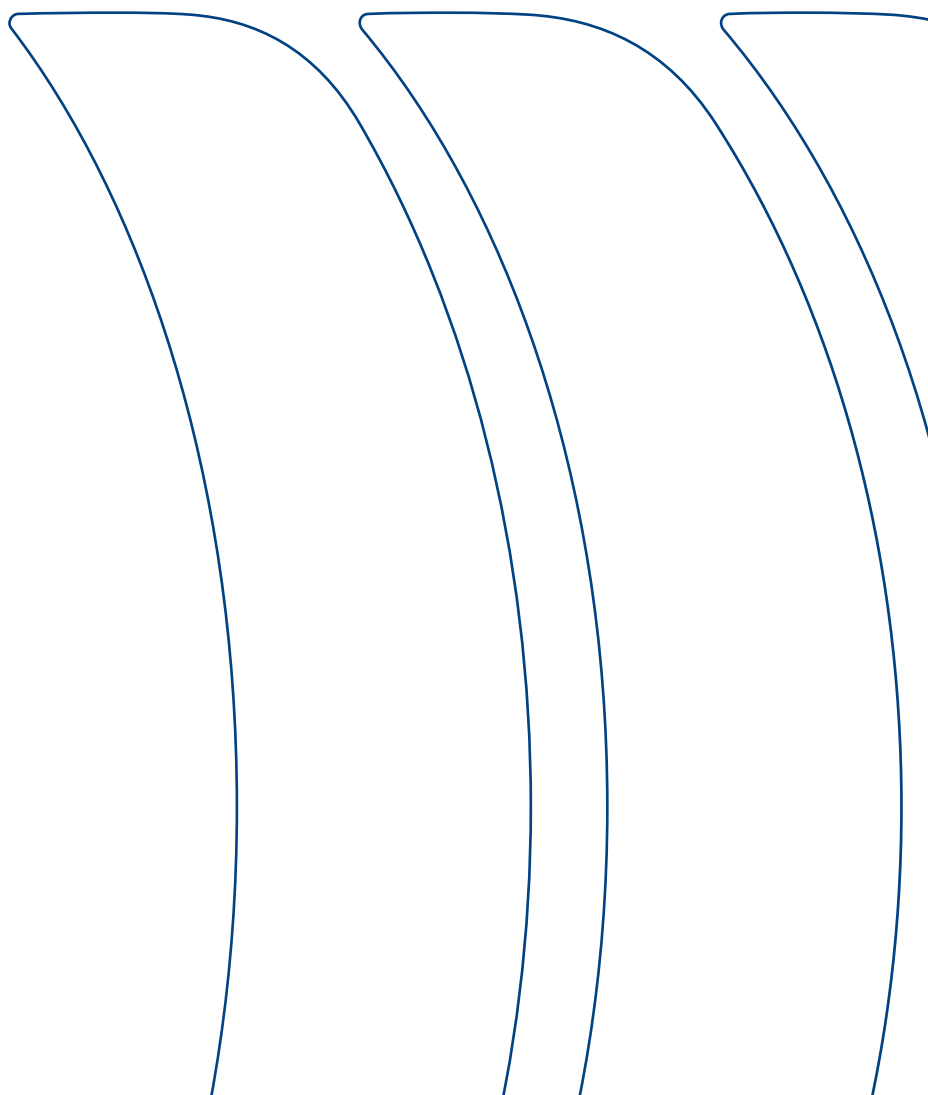


Table of Contents

	Page
1. General	1
2. Overview of Cogeco’s Activities	2
3. Cogeco’s Commitment to Accessibility	2
4. Consultations	3
5. Cogeco’s Three-Year Accessibility Plan – Key Plan Elements and Actions	3
a. Employment (Internal Systems, Governance, Wellbeing and Talent Attraction)	4
b. Customer/Community (Information, Technology, Goods & Services & the Built Environment)	6
c. Ongoing Progress Monitoring	8
6. Regulatory Conditions	8
7. Conclusion	9
8. Appendices	10
a. Appendix A – Barriers identified as part of CTA industry consultations with persons with disabilities.....	10
b. Appendix B – Requirements under the <i>Telecommunications Act</i>	11
c. Appendix C – Requirements under the <i>Broadcasting Act</i>	13

1. General

Cogeco Inc.'s (Cogeco) *Accessibility Plan (2023-2026)* has been prepared in accordance with the requirements of the *Accessible Canada Act* (S.C. 2019, c.10) and its regulations (ACA).

Our Accessibility Plan can be requested in an alternate format and accessibility-related feedback can be submitted anonymously, via telephone or email. The designated person responsible for receiving accessibility feedback is:

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2. Overview of Cogeco's Activities

Rooted in the communities it serves, Cogeco is a growing competitive force in the North American telecommunications and media sectors with a legacy of more than 65 years. Through its subsidiary, Cogeco Communications Inc., Cogeco provides Internet, video and phone services to 1.6 million residential and business customers across Canada and the United States. In Canada, these services are provided by Cogeco Connexion Inc., a subsidiary of Cogeco Communications. Through Cogeco Media Inc., Cogeco owns and operates 21 radio stations in Quebec and Ontario, as well as a news agency.

3. Cogeco's Commitment to Accessibility

Cogeco's core values include a strong commitment to customer and community and social engagement, innovation and teamwork. We aim to be a recognized diverse, equitable, inclusive and accessible employer, corporate citizen and provider and we recognize that accessible programs, practices, policies, services and products are a key enabler to achieve that mission. d provider

In recognition of the ACA's objective of achieving a barrier-free Canada by 2040, Cogeco Inc. and its subsidiaries committed to proactively identifying, removing and preventing barriers to accessibility for people with disabilities in a timely manner. Of the ACA's priority areas, the following are relevant to Cogeco: employment; the built environment; information and communication technologies (ICT); communication other than information and communication technologies; and goods and services.

In accordance with the ACA and its established Accessibility Standards and the related Canadian Radio-television and Telecommunications Commission (CRTC) regulations published in July 2021, the following report outlines Cogeco's three-year plan to identify, remove and prevent barriers facing people with disabilities. This will include the continual improvement of access to Cogeco's facilities, policies, programs, practices and services for employees, customers and members of the community.

In preparing this Accessibility Plan, Cogeco has taken into account the principles set out at section 6 of the ACA, as follows:

- (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.

4. Consultations

In the preparation of this Accessibility Plan, Cogeco consulted both internally and externally with persons with disabilities.

- External consultations: Cogeco participated in consultations led by the Canadian Telecommunications Association (CTA, then the Canadian Wireless Telecommunications Association). The CTA engaged in surveying, data collection and conducted virtual consultation sessions with persons with disabilities and organizations working with the disability community or within the disability sector in Canada. Barriers that were identified as a result of these consultations can be found at **Appendix A** of this Accessibility Plan.
- Internal consultations: Cogeco established an Employee Resource Group, *Connect Abilities*, for employees who identify as persons with disabilities. *Connect Abilities* is focused on helping Cogeco better address employees' accessibility needs, reducing internal attitudinal barriers, and increasing awareness about the importance of inclusion, accessibility and allyship as well as offering networking opportunities.

5. Cogeco's Three-Year Accessibility Plan – Key Plan Elements and Actions

Based on the findings that surfaced through our internal and external consultation processes, we provide, below, a list of actions we will take to ensure Cogeco's workplace and customer environment support access to services aligned to the ACA. Areas of focus include internal employee systems, governance and processes, wellbeing and talent attraction, as well as customer and community initiatives. Some of the actions described herein haven already been implemented, while some are currently ongoing or are expected to be implemented within the next three years. We plan to provide progress updates annually and adapt our plans to ensure that they address any new barriers that might negatively impact our employees, customers or other stakeholders.

A. Employment (Internal Systems, Governance, Wellbeing and Talent Attraction)

Recent Enhancements

Aligned with Cogeco's focus on diversity, equity and inclusion (DEI), Cogeco has taken several impactful steps to drive an inclusive, equitable and accessible workplace as it relates to ensuring equitable systems, employee well-being and an inclusive workplace culture. Recently, Cogeco undertook an extensive internal review of its governance structures, policies and practices. The outcome of this resulted in the development and enhancement of a variety of governance models and policies to communicate the importance of inclusion and accessibility both internally and to prospective employees.

To drive a greater focus on and awareness and accountability for health, safety and wellbeing of employees, Cogeco Connexion recently implemented a new governance model. A Health and Wellness Steering Committee is now in place and includes executive champions of mental health and wellbeing and clearly defined roles and responsibilities for all committee members who have received formal training.

Cogeco also launched new internal Employee Resource Groups, including *Connect Abilities*, which is focused on helping Cogeco better address employees' accessibility needs, reducing internal attitudinal barriers, increasing awareness about the importance of inclusion, accessibility and allyship as well as offering networking opportunities. *Connect Abilities* members works with the Health and Wellness team to offer a variety of initiatives such as roundtables, yoga, meditation and virtual learning during Mental Health awareness month and a podcast series on Autism Awareness.

To attract a greater diversity of candidates and broaden the pool of talent, Cogeco has established several partnerships with external organizations to disseminate job openings to over 800 diversity-focused organizations nationally. For the last two years, Cogeco has participated in the Annual Canadian Congress on Disability Inclusion Conference and Talent forum hosted by Employment and Social Development Canada and has begun discussions with *Neuroplus*, a Quebec-based organization that helps place individuals who identify as neurodiverse.

While there is still work to do to continue to increase self-identification and hiring, Cogeco made considerable progress in 2022. The representation of employees who identified themselves as persons with disabilities increased by 65% to 5.1% overall, and Cogeco is seeing an increased hiring rate and fewer departures than in previous years.

Future Opportunities

Cogeco has identified several key areas of opportunity and has aligned action steps to enhance workplace culture, support the employee experience and help attract and retain talent. The resulting plans align around the following areas:

- **Employment brand /Talent Attraction Enhancement**
 - F23 - Initiate additional tracking of candidate data to ensure applicants are not self-disqualifying and bias is mitigated. With this tracking, Cogeco is very tightly managing access to any individual data so that we can address aggregate trending without creating risk of biases being introduced into the process.
 - F24 - Advance work with hiring managers and business leaders to maximize diversity of applicants and minimize bias in the hiring process.
 - F23 & F24 - Update employment brand messages on Cogeco's career site to demonstrate a commitment to accommodation, accessibility and an inclusive workplace culture.
 - F23 & F24 - Continue broadening talent pools by working with targeted organizations that will help Cogeco attract prospective talent with disabilities, including neurodiversities.

- **Expand, standardize and clarify the accommodation process to all business areas and create awareness amongst managers**
 - F23 & F24 - Standardize, expand and communicate accommodation procedures and guidelines across all businesses.
 - F23 & F24 - Create and rollout training and communication regarding Cogeco's accommodation program including educating managers about the duty to accommodate, common types of accommodation and the process and guidelines in obtaining an accommodation. The training will seek to decrease stigma, share best practices and an increased understanding of the types of disabilities in the workplace such as mental health and neurodiversity.
 - F25 & F26 - Investigate feasibility to implement a universal tracking mechanism for accommodations.
 - F26 - Consider a formal accommodation policy with references to available assistive technology.
 - Ongoing - Continue to reiterate and support managers in offering flexible work arrangement policies, to the extent possible.

- **Create awareness and support continued learning**
 - F23 & F24 - Develop and share an accessibility toolkit with guiding principles and tips to ensure Cogeco's workplace and mediums are accessible.
 - F24 & F25 - We will review the opportunity to implement specific training for product teams on accessibility and inclusive design.

- Ongoing - Director, Diversity, Equity & Inclusion will continually monitor and stay informed on accessibility resources available through central agencies as they become available.
- **Enhance the Built Environment/Ensure Premises Accessibility**
Addressing built-environment-related barriers will ensure that people have barrier-free access to our offices and retail spaces.
 - F24 - Undertake a formal review of Cogeco's premises and consider accessibility upgrades.

B. Customer/Community (Information, Technology, Goods and Services and the Built Environment)

Recent Enhancements

Cogeco Connexion offers a variety of options when it comes to electronic billing including providing braille statements upon request. In addition, closed captioning, voice over internet protocol (VoIP) and phone relay for customers who are hearing impaired as well as mobile phone accessibility and screen reader (including magnification, large text, high contrast colours suitable for vision impaired as well as, braille display) are all in place for enhanced internet based accessibility. We also offer a web based chat tool on our website which enables written communication with technicians in English and French. Cogeco's Web team is currently overhauling the look and feel of the website and all are trained on compliance standards/accessibility requirements and WCAG 2AA requirements/compliance.

In terms of other relay services, Cogeco Connexion offers live and closed captions notification options using light and vibration. And the new My Account App also offers accessibility features for customers to navigate apps on phones.

In addition, Cogeco Média has recently begun testing solutions to transcript audio for people with hearing disabilities whereby radio content is published in writing on the website.

In accordance with the recent regulation, Cogeco established and implemented a customer accessibility feedback mechanism and process to address customer inquiries regarding Accessibility. Since June 2022, both of Cogeco Connexion and Cogeco Média have a dedicated email address and contact to direct accessibility questions and provide feedback on our accessibility enhancements across our channels.

In addition, more broadly, recognizing the needs of the aging population in Canada and the community at large Cogeco recently expanded the *Connecting Families program* to offer a discounted product offer to even more low income seniors, many of whom identify as having a disability.

Cogeco's has also established a number of ongoing charitable and in kind partnerships with organizations like *Discover Ability*, whom we are working with to increase awareness of their offering on Cogeco's community tv channels as well as *Ontario Chamber of Commerce*, in support of programming to improve accessibility and hiring within our communities.

Future Opportunities

Cogeco Connexion has identified several key areas of opportunity and aligned steps to ensure it continues to meet the accessibility needs of its customers.

- **Continue to enhance technology**
 - **F23-F26** - Cogeco will continue to identify and introduce various alternative accessible formats for users to have a variety of means to communicate according to their needs. This includes non-verbal options, usability and compatibility of websites etc.
 - **F23** - Assess accessibility compliance to ensure the webmail server is keyboard accessible (currently only usable with a mouse) and continuously monitor screen reader accessibility; work with project manager and third parties.
 - **F23** - Ensure accessibility is added/formalized into the product briefing process and roadmap for all future releases.
 - **F 25** - Ensure mobile applications are coded for navigation with assistive technology.
 - **Ongoing**: Progressively update webpages as progress is made on the above action items.

- **Information - Streamline and simplify websites, develop videos to explain services**
 - **F23** - Consider implementing descriptive videos on our webpages.
 - **F24** - Consider implementing a voice to text solution to transcribe audio files into text and publish on the website for people with a hearing disability.
 - **Ongoing** - Monitor demand to determine whether there is a need to introduce signing at the store and contact centre level e.g. using Direct Video Calling (access to VRS & VRI at store) or offering a voice feedback option or talkback option to assist customers in selecting programs.

- **Ensure enhanced accessibility of products and services**
 - **F23** - Opportunity to formalize accessibility requirements when planning product strategy and building a new product.
 - **F23** - Customer Journey roadmap to be updated to include employee focus groups to provide feedback on apps, products, services etc. and to identify future enhancements.
 - **F23** - Ensure that accessibility features are built into new mobile platforms and features.
 - **Ongoing** - Engage employees and customers to ensure accessibility requirements are being met in testing/input and feedback on services, devices, practices and policies; When creating new programs or policies such as training initiatives for service reps, service providers will gather input from *Connect Abilities* committee members to participate in focus groups/ensure access to services.
 - **Ongoing** - Leverage *Connect Abilities* committee members in developing /reviewing messaging, training and within employee focus groups.

- **Training front line employees to meet the needs of persons with disabilities**
 - **F25 & F26** - Enhance training for customer facing employees (including in-home installation employees) on how to communicate and interact appropriately and to ensure that our employees are aware of and equipped to share the available accessibility services and features for customers.
 - **F26** - Consider introducing Accessibility Standards for Customer Service
 - **Ongoing** - Leverage *Connect Abilities* committee members in developing/reviewing messaging and training.

- **Enhance the Built Environment/Ensure Premises Accessibility**
Addressing built-environment-related barriers will ensure that customers entering Cogeco's premises have barrier-free access to full and equal participation in society, and in the regulatory process.
 - **F24** - As part of an audit of the premises we own and lease, the Facilities Management team will undertake a formal review of our retail points of sale using the AODA checklist. Locations with larger customer bases will be prioritized.

C. Ongoing Progress Monitoring

To enable Cogeco to continue to meet accessibility commitments and requirements of the ACA, Cogeco will:

- Regularly confer with key internal stakeholders to ensure that progress is being made on the action items noted above as well as to evaluate the effectiveness of the implementation of barrier removal and prevention strategies and plan for increased accessibility throughout Cogeco.
- Continue to raise internal awareness about the ACA and consider accessibility and inclusive design in all new products, services and solutions.
- Identify new avenues to collaborate with employees - including via Employee Resource Groups - and customers with disabilities to identify new barriers and opportunities, and learn from their experience.
- Continue to review and proactively address any new accessibility barriers.
- In preparation for upcoming progress reports, Cogeco will consult with persons with disabilities, as per the ACA's requirements. This process may also include hosting a focus group with customers with disabilities to identify, remove and prevent barriers to accessibility specific to advertising materials, products and services.

6. Regulatory Conditions

As required by sections 42(1) and 51(1) of the ACA, Cogeco is providing a list of regulatory conditions it is subject to that relate to the identification and removal of barriers and the prevention of new barriers. Conditions imposed by the CRTC under the *Telecommunications Act*, as well as regulations made thereunder, are listed in **Appendix B**. Licence conditions, regulations and orders made under the *Broadcasting Act* are listed in **Appendix C**.

7. Conclusion

Cogeco is committed to removing accessibility barriers for our customers and employees. To that end, Cogeco will continue to consult with persons with disabilities, both internally and externally, in the coming years. We will strive to improve accessibility and contribute to the realization of a barrier-free Canada. As required by the ACA, we will publish an updated Accessibility Plan every three years, and publish annual progress reports in the interim.

8. Appendices

Appendix A – Barriers identified as part of CTA industry consultations with persons with disabilities

<u>Interaction</u>	<u>Nature of Issue</u>	<u>Examples</u>
<u>Shopping</u>	When shopping for services individuals who are blind or partially sighted primarily reported issues with websites and contact centres.	<ul style="list-style-type: none"> • Websites are not fully accessible. Videos need captions. • Websites are difficult to navigate (using screen readers) • Websites have too many elements or too much information or complexity
<u>Contact Centres</u>	Service representatives unaware of accessible products or services available.	
<u>Service Set up and communication</u>	When setting up services, many of the barriers reported were related to in-home installation	<ul style="list-style-type: none"> • Technicians need training on how to support customers who are blind or deaf, how to turn on accessibility features and need to be informed in advance of the disability
<u>Managing</u>	When managing services or making changes, barriers identified on websites	<ul style="list-style-type: none"> • Websites or Mobile applications can be difficult to navigate. • Service representatives were not aware of the type of equipment for customers with disabilities and or how to adjust equipment in order to make it accessible.
<u>Services</u>	Blind or partially sighted participants noted barriers to websites, apps, service support and equipment	<ul style="list-style-type: none"> • Websites and apps are not all completely accessible. • Another comment that was received was that there is no chat tool in the app which can be a challenge. • When speaking to service representatives, lack of understanding on how to provide instructions for someone who has a visual impairment • Equipment lacking audible feedback or voice descriptions (tactile markers should be added)
<u>Features</u>	Accessible features a must when choosing a device or equipment or service ; anything visual has to have spoken or audio output, tactile markers etc	<ul style="list-style-type: none"> • Features such as voiceover, Siri, descriptive video, or other related features can allow someone who is Blind or partially sighted to use their devices or equipment independently. • Importance placed on features that make device or equipment accessible. Anything visual must have a spoken or audio output. • Many in-home devices, such as telephones or remote controls, do not have audible feedback on the keypads. • Noservice providers have fully accessible services currently. Cost can also be a major factor when deciding on a service. • Examples include screen magnification, text-to-speech (NVDA, Voice Over, Talkback, or others), and speech-to-text (Siri, Google Home, Alexa). • Some of the only devices that can be used independently are smartphones that include or are compatible with accessibility features or apps.

Appendix B - Requirements under the *Telecommunications Act*

This appendix sets out the following, as required by section 51(1) of the ACA:

- 51(1)(b) - the conditions imposed under section 24 or 24.1 of the *Telecommunications Act* to which the regulated entity 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 the regulated entity.

1. Internet Code¹

- Internet service providers (ISPs) must provide a customer with a copy of their contract and related documents in an accessible format for persons with disabilities upon request, at no charge, at any time during the commitment period.
- Tools offered to customers to monitor and manage their data usage and any additional fees incurred during a monthly billing cycle must be accessible to customers with disabilities.
- Training of sales representatives regarding rights and responsibilities under the Internet Code must cover accessibility needs.
- Compliance reports must include a description of how ISPs are ensuring that their customer service representatives are knowledgeable about both the ISPs' and customers' rights and responsibilities under the Code, including those specifically related to Canadians with disabilities.
- ISPs are required to produce videos in ASL and LSQ in their Internet Code awareness campaigns.
- ISPs must offer an extended trial period lasting a minimum of 30 calendar days to persons with disabilities. Usage limits for customers with disabilities must be at least double the service provider's usage limit for the standard trial period.
- A service provider must provide a customer with a copy of the Critical Information Summary (which includes information about the extended trial period for people with disabilities) in an accessible format for persons with disabilities, upon request and at no charge, at any time during the commitment period.

2. Broadcasting and Telecommunications Regulatory Policy 2009-430 - Accessibility of telecommunications and broadcasting services

- Telecommunications service providers (TSPs) must make their general call centres 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

¹ Telecom Regulatory Policy CRTC 2019-269, *The Internet Code*

- TSPs must make their interactive voice response systems accessible.
- All local exchange carriers (LECs) are required to provide teletypewriter (TTY) and Internet protocol (IP) relay service to their customers, 24 hours a day, 7 days a week.
- TSPs must make the information on telecommunications and broadcasting services on their websites accessible to the point of providing a reasonable accommodation for persons with disabilities.
- Where customer service functions on websites are not accessible, persons with disabilities must not incur a charge or otherwise be disadvantaged if they use an alternate channel of customer service to access those functions.
- TSPs must incorporate an easy-to-find home page link to the special needs/disability sections of their websites, if their websites include such sections.

3. CRTC Accessibility Reporting Regulations (SOR/2021-160)

- A regulated telecommunications entity must make available, upon request, its accessibility plans, progress reports and descriptions of feedback processes under the ACA 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 entity agree upon and for which there is proof of the agreement.
- Accessibility plans, progress reports and descriptions of feedback processes under the ACA must be published in a format that meets W3C Web Content Accessibility Guidelines (WCAG).

4. Other requirements

- Canadian carriers, as a condition of offering telecommunications service to non-carriers, must include in their tariffs and service contracts the requirement that non-carriers and all of their wholesale customers and subordinate wholesale customers, abide by certain accessibility obligations (Telecom Regulatory Policy CRTC 2017-11).
- TSPs must fund video relay service (VRS) nationally via the National Contribution Fund (Telecom Regulatory Policy CRTC 2014-187).
- Message Relay Services (MRS) provided by TSPs must meet minimum requirements established by the CRTC and certain TSPs must file annual reports on quality of service data (Telecom Regulatory Policy CRTC 2018-466)
- MRS providers must provide access to 9-1-1 service (Telecom Regulatory Policy CRTC 2018-466)
- TSPs must provide paper bills to customers who self-identify as a person with a disability (Telecom and Broadcasting Decision CRTC 2022-28)

Appendix C - Requirements under the *Broadcasting Act*

This appendix sets out the following, as required by section 42(1) of the ACA:

- 42(1)(b) - the conditions imposed on the regulated entity under section 9.1 of the Broadcasting Act 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 that Act that relate to the identification and removal of barriers and the prevention of new barriers and that apply to the regulated entity; and
- 42(1)(d) - the provisions of any regulations made under subsection 10(1) of that Act that relate to the identification and removal of barriers and the prevention of new barriers and that apply to the regulated entity.

The following accessibility requirements apply to Cogeco's broadcasting distribution undertaking (BDU) activities and on-demand services.

1. Television Service Provider Code

- BDUs, as television services providers (TVSPs), must offer customers with disabilities a trial period lasting a minimum of 30 calendar days. During the trial period, customers must be able to cancel their agreement without penalty, installation fees or early cancellation fees if they have returned any gift with purchase and equipment provided by the TVSP, in near-new condition.
- BDUs, as TVSPs, must ensure that written agreements and the Critical Information Summary can be provided in an alternative format for people with disabilities upon request, at no charge.

2. Conditions of BDU license²

- Cogeco must adhere to the Television Service Provider Code.
- Cogeco's annual returns must include information on (i) the availability of accessible set-top boxes and remote controls, and their accessibility features; (ii) the penetration of accessible set-top boxes and remote controls with the licensee's customer base; and (iii) the number of accessibility-related queries received by Cogeco, and the number successfully resolved.
- Cogeco must close caption 100% of original licensee-produced English- and French-language programming aired on its community channel by the end of its license term.
- Cogeco must provide audio description for all key elements of information programs, including news programming on its community channel.
- Cogeco must provide the necessary training to hosts and access producers associated with its community channel concerning the provision of audio description.

² Appendix 1 to Broadcasting Decision CRTC 2018-264, *Cogeco – License renewal for various terrestrial broadcasting distribution undertakings*

- Cogeco must provide one or more simple means of accessing described programming, whether in an open or embedded format, that requires little or no visual acuity.
- Cogeco must promote information on all of its disability-specific services and products, in the accessible manner(s) of its choice.
- Cogeco 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.
- Cogeco must make the information on its website accessible to the point of providing reasonable accommodation for persons with disabilities.
- Where customer service functions on its website are not accessible, Cogeco must ensure that persons with disabilities will not incur a charge or otherwise be disadvantaged if they use an alternate avenue of customer service.
- Cogeco must make accessible any customer service functions that are available solely over its website.
- Cogeco must make its general call centres accessible to the point of providing reasonable accommodation to persons with disabilities by: (i) 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 (ii) making its Interactive Voice Response systems accessible.

3. Standard requirements for on-demand services³

- BDUs must close caption 100% of the English- and French-language programs in their inventory.
- BDUs must implement a monitoring system to ensure that, for any signal that is close captioned, the correct signal is captioned, captioning is included in the broadcast signal, and captioning reaches the distributor of that signal in its original form.
- Closed captioning provided by English- and French-language on-demand services must meet certain quality standards, notably with respect to lag time and accuracy.

4. CRTC Accessibility Reporting Regulations (SOR/2021-160)

- A regulated broadcasting entity must make available, upon request, its accessibility plans, progress reports and descriptions of feedback processes under the ACA 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 entity agree upon and for which there is proof of the agreement.
- Accessibility plans, progress reports and descriptions of feedback processes under the ACA must be published in a format that meets W3C Web Content Accessibility Guidelines (WCAG).

³ Appendix 1 to Broadcasting Regulatory Policy CRTC 2017-138, *Standard requirements for on-demand services*

5. Other requirements

- BDUs are required to distribute AMI-Audio and AMI-tv in Anglophone markets, as well as AMI-télé and Canal M in Francophone markets. This applies to licensed BDUs and exempt BDUs with more than 2,000 subscribers (Broadcasting Orders CRTC 2018-320, 2018-321, 2018-322 and 2018-308; Broadcasting Distribution Regulations (SOR/97-555); Broadcasting Regulatory Policy CRTC 2017-319; and Broadcasting Order CRTC 2017-320).
- BDUs cannot alter the content or format of a programming service or delete a programming service in the course of its distribution. (Broadcasting Distribution Regulations (SOR/97-555); Broadcasting Regulatory Policy CRTC 2017-319; and Broadcasting Order CRTC 2017-320).
- BDUs must provide equipment, software or other technology for customers with visual or fine motor skills disabilities to identify and have access to programming services (Broadcasting Distribution Regulations).