

# CRTC Interventions 101

A Nuts-and-Bolts Workshop on All the Logistical Details  
You Never Wanted (But Need) to Know

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*Prepared for The Future of First Nations, Inuit, and Métis Broadcasting Conference  
Ottawa, ON, 16 June 2017*

# What to Expect

- ▶ **Process and Procedure:** What, where, when, how?
- ▶ **Terminology:** What do all the acronyms mean?
- ▶ **Mechanics:** Literally what do I do?
- ▶ **Navigation:** Where do I find \_\_\_\_ on the CRTC website?
- ▶ **Best Practices:** So you don't have to learn the hard way

# Introduction to Interventions

- ▶ What is an intervention?
- ▶ Who usually intervenes?
- ▶ Why should you intervene?  
(Why are you here?)



# Anatomy of a CRTC Proceeding

1. ROUND 1: Notice of Consultation
2. ROUND 2: Intervention
3. ROUND 3: Interrogatories & RFIs
4. ROUND 4: Reply Comments
5. ROUND 5: Hearing
6. ROUND 6: Undertakings
7. ROUND 7: Final Reply

# ROUND 1: Notice of Consultation

- ▶ Telecom or Broadcasting?
  - ▶ NoC
  - ▶ TNC / BNC / BTNC / CENC
- ▶ Procedure
- ▶ Deadlines
- ▶ Appendices (Questions, Proposed Views, Data)



The screenshot displays the CRTC website interface. At the top, the 'Canada' logo is on the left, and a search icon is on the right. Below this is a blue header bar with the text 'Canadian Radio-television and Telecommunications Commission'. A breadcrumb trail reads 'Home → Business → Decisions, Notices and Orders'. The main heading is 'Telecom Notice of Consultation CRTC 2017-112', with a link for the 'PDF version'. The date 'Ottawa, 25 April 2017' and file number '1011-NOC2017-0112' are listed. A section titled 'Call for comments' follows, with the specific topic 'Development of the Commission's broadband funding regime'. It states the 'Deadline for submission of interventions: 28 June 2017' and provides a link to 'Submit an intervention or view related documents'. A paragraph explains that the Commission is initiating a proceeding to examine matters related to the establishment of the broadband funding regime, including its governance, operating, and accountability frameworks. A 'Background' section begins with a numbered point stating that telecommunications services are vital for all Canadians and that the Commission seeks to ensure a world-class communication system.

Canada

Canadian Radio-television and Telecommunications Commission

[Home](#) → [Business](#) → [Decisions, Notices and Orders](#)

## Telecom Notice of Consultation CRTC 2017-112

[PDF version](#)

Ottawa, 25 April 2017

File number: [1011-NOC2017-0112](#)

### Call for comments

#### Development of the Commission's broadband funding regime

Deadline for submission of interventions: 28 June 2017

[\[Submit an intervention or view related documents\]](#)

*The Commission hereby initiates a proceeding to examine matters related to the establishment of the broadband funding regime, including its governance, operating, and accountability frameworks, as well as eligibility and assessment criteria for proposed projects.*

#### Background

1. Telecommunications services play an important role in the lives of all Canadians. Modern telecommunications enable Canadians to participate in today's digital economy and provide access to services, such as health care, education, government, public safety, and banking services. As the regulator of Canada's communication system, the Commission seeks to ensure that all Canadians have access to a world-class communication system and engages in activities which, among other things, aim to ensure that Canadians are able to connect to quality and innovative communications services at affordable prices.

# ROUND 1: GO!

**Find BNC CRTC 2017-160 on the CRTC website.**

1. What is the category and subject of the proceeding?
2. What are the proceeding stages and their deadlines?
3. What do the appendices contain?

# ROUND 2: Intervention

## Guiding Questions

- ▶ What do you want to say? What is the unique perspective you are offering?
- ▶ What should the Commission know? Why is it important that they know it?
- ▶ If there is a problem, can you offer a solution or specific recommendations to address it?
- ▶ What evidence do you have to support your points and recommendations?

# ROUND 2: Intervention (Submitting)

Canada  
Canadian Radio-television and Telecommunications Commission

Home → Business → Decisions, Notices and Orders

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[PDF version](#)

Ottawa, 25 April 2017

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Canada  
Canadian Radio-television and Telecommunications Commission

Home → Business & Licensing → Participate in a Proceeding → Telecom Proceedings → Open Notices of Consultation

### Open Notices of Consultation

**How to submit**

To submit an intervention/comment, click the Submit button associated with the notice/application/reference number for which your intervention applies.

- To sort the information within the table, click on the column heading.
- To view the details of the notice (where applicable), click on the link to the notice in the Notice Number/Part 1 column.
- To view the details of the application/reference, click on the link to the application/reference number in the Subject column.
- To view all other documents associated with the notice/application/reference, click the links in the related documents column.

Where the applicant is a partnership, the application is considered filed by all partners, carrying on business under the partnership name identified in the Subject column.

**Your intervention/comment must be submitted no later than 5:00 p.m. Vancouver time (8:00 p.m. Ottawa time) on the deadline date.**

| Notice Number/Part 1                                 | Subject   | Posted Date   | Deadlines  | Related Documents  |
|--|---|---------------|--|--|
| <a href="#">2017-112</a>                             | Call for comments - Development of the Commission's broadband funding regime File number: 1011-NOC2017-0112 | 25 April 2017 | 28 June 2017<br><a href="#">Submit</a>                     | <a href="#">Interventions</a>  |
| <a href="#">2017-92</a><br><a href="#">2017-92-1</a> | Call for comments - Phase-out of the local service subsidy regime File number: 1011-NOC2017-0092            | 6 April 2017  | Revised deadline<br>15 June 2017<br><a href="#">Submit</a> | <a href="#">Commission Letter 16 May 2017</a><br><a href="#">Interventions</a><br><a href="#">Procedural Letter 13 April 2017</a><br><a href="#">Procedural Letter 13 April, 2017</a><br><a href="#">Procedural requests</a> |
|  | 2017-92-1 - Changes to procedure  |               |  |  |

Phone Internet TV & Radio Business & Licensing

Home → Business & Licensing → Participate in a Public Proceeding → Intervention Comment Form

### Intervention Comment Form

**Confidential Documents or Procedural Requests**

**IMPORTANT:** To submit confidential documents or procedural requests you **MUST** use **MY CRTC ACCOUNT** (GCKey and Partner Log In). This service ensures the secure submission of confidential documents and that your procedural request is processed in a timely manner.

**Procedural requests:** The Rules of Practice and Procedure (Rules) allow an interested person to request that the CRTC exercise a power under the Rules or change the Rules for a specific proceeding (sections 5 and 7). This is generally called a procedural request. See paragraph 24 of Information Bulletin [2010-959](#).

You are commenting on: **Notice 2017-112** - Call for comments - Development of the Commission's broadband funding regime File number: 1011-NOC2017-0112

**Submit an Intervention**

My intervention is in

[Comment](#)

You must provide your comments (Intervention) in the box below AND/OR in an attachment (required)

Comments

Attaching a file?

- Documents should be submitted in an accessible format ([Broadcasting and Telecom Information Bulletin CRTC 2015-242](#)).
- Click 'Upload File(s)'.
- Find the file(s) on your computer. Select the file(s), then click **Open**.
- The maximum size per file is 10 Mb.

[Upload File\(s\)](#)

**IMPORTANT - CONFIDENTIAL DOCUMENTS: CONFIDENTIAL DOCUMENTS MUST BE SUBMITTED USING MY CRTC ACCOUNT (GCKey and Partner Log In). This service ensures the secure submission of confidential documents.**

**Do you wish to appear?**

If an Appearing Hearing is held, would you wish to appear to make a presentation before the CRTC?

☐ I do not wish to appear

☐ I request to appear



# ROUND 2.5: NoC & Proceeding Docket

Canadian Radio-television and Telecommunications Commission

Phone Internet TV & Radio Business & Licensing

Home » Business & Licensing » Participate in a Proceeding » Telecom Proceedings » Open Notices of Consultation

**Business & Licensing**

Participate in a Proceeding

All Public Proceedings Open for Comment

**Broadcasting Proceedings**

**Telecom Proceedings**

All Proceedings Open for Comments

Open Notices of Consultation

Open Part 1 Applications

All Proceedings Closed For Comment

Closed Notices of Consultation

Closed Part 1 Applications

Other Proceedings

Part VII Applications

Tariff Applications

Agreement Applications

International Licence Applications

Other Telecom Filings

Resources

How to participate in a public proceeding

Commission Letters

Rules of Procedure

List of Parties (prior to 2012)

Telecom Applications Report

**Compliance and Enforcement Proceedings**

**Open Notices of Consultation**

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Canada

Canadian Radio-television and Telecommunications Commission

Home » Business » Decisions, Notices and Orders

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Ottawa, 25 April 2017

File number: [1011-NOC2017-0112](#)

### Call for comments

### Development of the Commission's broadband funding regime

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# ROUND 2: GO!

**Find the docket for BNC CRTC 2017-160.**

1. What documents are listed for that proceeding?

# ROUND 3: Interrogatories

- ▶ **What are interrogatories?**
  - ▶ Formal questions & responses to/from other parties
  - ▶ Requests for Information (RFI)
- ▶ **Why ask them?**
  - ▶ Fact-Finding
  - ▶ Establishing Evidence
  - ▶ Building the Record



*Crucial testimony in the case of Cinderella vs. the Association of Fairy Godmothers.*

# ROUND 3: Interrogatories

## **Appendix “F”:** Interrogatories Addressed to TELUS Communications Company (“TELUS”)

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### **TELUS(AAC)2Nov15 – 1**

Refer to TELUS’s response to TELUS(AAC)14Aug15-6, where Dr. Crandall states as part of his response that the lack of effectiveness of telecommunications service subsidies “occurs because it is difficult to target such subsidies on non-subscribers or on un-served populations.” Is it TELUS’s position that telecommunications service subsidies should be targeted solely at non-subscribers and unserved populations?

### **TELUS(AAC)2Nov15-2**

Refer to TELUS’s response to TELUS(AAC)14Aug15-6, where Dr. Crandall states as part of his response that subsidizing telecommunications services “could even reduce the total value of all telecommunications services provided.”

On what evidentiary basis, if any, does Dr. Crandall assert that telecommunications service subsidies “could even reduce the total value of all telecommunications services provided”? Please provide any such evidence for the public record. If the response included this assertion in the absence of supporting evidence, please confirm this.



# ROUND 3: GO!

You represent WiseUp as an intervener in BNC CRTC 2018-7, a broadcasting consultation about how to allocate a new round of funding. WiseUp is a small non-profit online radio and TV station that has roots in the local region and has recently gained popularity through unique music and language channels. Your main competitor for the funding, the legacy station Ace TeleCable, writes in their submission (paragraph 8) that they are struggling financially because audiences are watching more and more content online. You have heard through some sources that this is only the case for some of Ace's programs, and occurred after new management took over two years ago. Their other programs have actually increased viewership over that same period.

Interrogatories are due June 20, 2017. Write one interrogatory from WiseUp and addressed to Ace TeleCable, in light of the above circumstances.

## **Appendix "F": Interrogatories Addressed to TELUS Communications Company ("TELUS")**

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On what evidentiary basis, if any, does Dr. Crandall assert that telecommunications service subsidies "could even reduce the total value of all telecommunications services provided"? Please provide any such evidence for the public record. If the response included this assertion in the absence of supporting evidence, please confirm this.

# ROUND 4: Reply Comments

- ▶ Opportunity to respond to everyone else's submissions
- ▶ Use information that came out of responses to interrogatories
- ▶ Usually limited by evidence and arguments already on the record
- ▶ Not the same as “Further Intervention”

# ROUND 4: Reply Comments

Canadian Radio-television and Telecommunications Commission



Search

PhoneInternetTV & RadioBusiness & Licensing

Home > Business & Licensing > Participate in a Proceeding > Telecom Proceedings > Closed Notices of Consultation

Business & Licensing

Participate in a Proceeding

All Public Proceedings Open for Comment

Broadcasting Proceedings

Telecom Proceedings

All Proceedings Open for Comments

Open Notices of Consultation

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Where the applicant is a partnership, the application is considered filed by all partners, carrying on business under the partnership name identified in the Subject column.

To access notices/applications/references that are closed for comment, select the year from the list.

2016

| <a href="#">Notice Number/Part 1</a> | <a href="#">Subject</a>  | <a href="#">Posted Date</a> | <a href="#">Deadlines</a>                          | <a href="#">Related Documents</a>  |
|--------------------------------------|--|-----------------------------|--|--|
| <a href="#">2016-431</a>             | Show cause proceeding and call for comments - Termination of participation in the Commissioner for Complaints for Telecommunications Services Inc. of VOIS Inc. - File number: 1011-NOC2016-0431 | 1 November 2016             | 1 December 2016<br><br>Replies<br>12 December 2016 | <a href="#">Costs</a><br><a href="#">Interventions</a><br><a href="#">Related documents</a>  |
| <a href="#">2016-333</a>             | Call for comments - Disconnection practices between telecommunications service providers File number: 1011-NOC2016-0333  | 18 August 2016              | 19 September 2016                                  | <a href="#">Costs</a><br><a href="#">Interventions</a><br><a href="#">Procedural Letter 21 November 2016</a><br><a href="#">Replies</a><br><a href="#">Responses to requests for information - 6 December 2016</a> |

# ROUND 5: Hearing

## Key Logistics

- ▶ **Organization and conduct letter (email):** important details, deadline to confirm appearance
- ▶ **Hearing Agenda:** Who is presenting and dates
- ▶ **Oral Remarks:** Send copy to hearing secretary in advance
- ▶ **Seating Plan:** So Commissioners know who is who
- ▶ **Bring hard copies:** Usually 30-40; check instructions
- ▶ **Monitor:** in person or through CRTC website or CPAC
- ▶ **Transcripts:** Speak slowly and clearly
- ▶ **KEEP CHECKING DOCKET FOR UPDATES**



# ROUND 5: Hearing

## Monday, 6 February 2017

1. The Coalition, composed of the Public Interest Advocacy Centre, Consumer Association of Canada, the National Pensioners Federation and the Council of Senior Citizens Organizations of British Columbia (int. #[150](#))
2. Bragg Communications Inc., carrying on business as "Eastlink" (int. #[132](#))
3. TELUS Communications Company (int. #[151](#))
4. Group of researchers composed of Marina Pavlovic, Mary Cavanagh, Sean Grassie and Lora Hamilton (int. #[142](#))

## Tuesday, 7 February 2017

5. Bell Mobility (int. #[135](#))
6. Consumers Council of Canada (int. #[119](#))
7. Quebecor Média inc., on behalf of its affiliate Vidéotron s.e.n.c. (int. #[147](#))
8. Rogers Communications Canada Inc. (int. #[145](#))

## Wednesday, 8 February 2017

9. Union des consommateurs (int. #[141](#))
10. Catherine Middleton and Tamara Shepherd (int. #[143](#))
11. Freedom Mobile (formerly known as WIND Mobile Corp.) (int. #[146](#))
12. Bradley Nickel (int. #[62](#))
13. Chris Coyle (int. #[137](#))
14. Victor Benitez (int. #[128](#))
15. Saskatchewan Telecommunications (int. #[136](#))
16. Forum for Research and Policy in Communications (int. #[139](#))

## Thursday, 9 February 2017

17. Deaf Wireless Canada Consultative Committee (int. #[133](#))
18. Media Access Canada, on behalf of the Access 2020 Coalition of Disabilities Stakeholders (int. #[138](#))
19. Ryan C. Adams (int. #[129](#))
20. Commissioner for Complaints for Telecommunications Services (int. #[148](#))

### Seating Plan

|               |              |             |             |
|---------------|--------------|-------------|-------------|
| Katy Anderson | Cynthia Khoo | Josh Tabish | Laura Tribe |
| Commissioners |              |             |             |

[2016-293](#)  
[2016-293-1](#)  
[2016-293-2](#)  
[2016-293-3](#)  
[2016-293-4](#)  
[2016-293-5](#)

Notice of Hearing 6 February 2017 Gatineau, Quebec Review of the Wireless Code File number: 1011-NOC2016-0293

28 July 2016

2016-293-1 - Changes to procedure - Revised deadline for submission of interventions: 3 October 2016

2016-293-2 - Revised deadline for responses to requests for information: 4 November 2016

2016-293-3 - Documents added to the record of this proceeding

2016-293-4 - Report added to the record of this proceeding

2016-293-5 - Deadline for Phase 2 of the online consultation: 6 to 20 February 2017 - Revised deadline for final submissions: 27 February 2017

Final Submissions  
 27 February 2017

[Additional Information](#)

[Agenda - Revised 6 February 2017](#)

[Commission Letter 1 March 2017](#)

[Commission Letter 20 February 2017](#)

[Commission Letter 21 February 2017](#)

[Commission Letter 24 February 2017](#)

[Commission Letter 27 February 2017](#)

[Commission Letter 3 February 2017](#)

[Costs](#)

[CRTC - Exhibit 1](#)

[CRTC - Exhibit 2](#)

[Deloitte - Report](#)

[Discussion forum comments](#)

[DWCC - ASL-LSQ video transcripts](#)

[Final Replies](#)

[Final submissions](#)

[Interventions](#)

[Organisation and Conduct letter of the hearing](#)

[Presentations at hearing](#)

# ROUND 5: GO!

**Find the docket for BNC CRTC 2017-1.**

1. You are an intervenor presenting in support of the application by Wawatay Native Communications. What was the date of your hearing appearance?

# ROUND 6: Undertakings

- ▶ Further requests for information from the Commission
- ▶ Issued during your hearing appearance
- ▶ Cannot refuse an undertaking
- ▶ Deadline set ahead of time (same for everyone)
- ▶ Do your best

# ROUND 7: Final Reply

- ▶ Last words
- ▶ Usually 10-15 pages max.

# BONUS: Procedural Miscellany

Things that Apply throughout Every  
Stage of a Proceeding  
*(CRTC Rules of Practice and Procedure)*

1. Calculating Deadlines
2. Procedural Requests
3. Commission Letters
4. Serving Parties
5. Distribution List

*Thank you!*

Cynthia Khoo

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twitter: [@cyn\\_k](https://twitter.com/cyn_k)