

Access to Information Act

CRTC Annual Report
2024-2025



Canadian Radio-television and
Telecommunications Commission

Conseil de la radiodiffusion et des
télécommunications canadiennes

Canada

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Introduction

The Canadian Radio-television and Telecommunications Commission (CRTC) is pleased to present its Annual Report to Parliament, in accordance with section 94(1) of the *Access to Information Act* (ATIA) (the Act). The report describes the activities that support compliance with the Act for the reporting period commencing April 1, 2024, and ending March 31, 2025.

The Purpose of the *Access to Information Act*

Section 2(a) of the Act provides Canadians with a right of access to federal government records under the control of a government institution. The Act further states in Section 3 that it is intended to complement and not replace existing procedures for access to government information and is not intended to limit in any way access to the type of government information that is normally available to the public.

CRTC Mandate and Responsibilities

The CRTC is an independent quasi-judicial tribunal that regulates the Canadian communications sector in the public interest. The CRTC holds public consultations on telecommunications and broadcasting matters and makes decisions based on the public record.

The CRTC operates under several legislated authorities and Acts of Parliament. These include the following: the *Canadian Radio-Television and Telecommunications Commission Act*, the *Bell Canada Act*, the *Broadcasting Act*, the *Telecommunications Act*, *Canada's Anti-Spam Legislation*, the *Accessible Canada Act*, the *Online News Act* and the *Canada Elections Act*, which includes provisions that established the Voter Contact Registry.

The CRTC's role includes consulting Canadians on communication issues of importance to them, making decisions and rules, responding to inquiries and complaints, as well as reporting to Canadians on the progress and outcomes of our work. The CRTC promotes and enforces compliance with its regulatory policies and decisions. It encourages and facilitates industry co-regulation and self-regulation through consultations, committees and working groups with various industry stakeholders. The CRTC also plays a key role in resolving industry disputes.

Finally, in the current dynamic and evolving communications environment, the CRTC collaborates with various domestic and international stakeholders to leverage capacity and intelligence on a host of interrelated policy issues and questions.

The CRTC delivers its mandate from offices in the National Capital Region and regional offices throughout Canada.

Organizational structure

The CRTC's Access to Information and Privacy (ATIP) Office operates under the Information Management and Information Technology Directorate and reports directly to the Chief Information Officer and Chief Data Officer.

When fully staffed, the CRTC ATIP Office has eight indeterminate employees and one student. Of these eight employees, seven are devoted full-time to the administration of the Acts, and one is dedicated to administrative support for the ATIP team. For the 2024–2025 reporting period, the CRTC staffed 5.70 full time employees (FTE), including 2.00 from part-time/casual employees and 0.700 from students relating to the *Access to Information Act*. The ATIP office does not have any regional employees.

In 2024-2025, the CRTC ATIP Office incurred an estimated \$489,617 in salary and overtime costs for the processing of requests received pursuant to the Act. These costs do not include the resources expended by the program areas of the CRTC to meet the requirements of the Act.

For a breakdown of the groups and/or positions responsible for meeting each applicable proactive publication requirement under Part 2 of the *Access to Information Act*, see the section "*Proactive Publication Under Part 2 of the ATIA*," below.

Proactive publication under part 2 of the *Access to Information Act*

Legislated requirements	Section of ATIA	Publication timeline	Do the requirements apply to your institution? (Y/N)	Internal group(s) or position(s) responsible for fulfilling requirement	Percentage of proactive publication requirements published within legislated timelines	Link to web page were published
Apply to all Government Institutions as defined in section 3 of the <i>Access to Information Act</i>						
Travel Expenses	82	Within 30 days after the end of the month of reimbursement	Y	Finance and Administrative Services	100%	Government Travel Expenses
Hospitality Expenses	83	Within 30 days after the end of the month of reimbursement	Y	Finance and Administrative Services	100%	Hospitality Expenses
Apply to government entities or departments, agencies, and other bodies subject to the Act and listed in Schedules I, I.1, or II of the <i>Financial Administration Act</i>						
Contracts over \$10,000	86	Q1-3: Within 30 days after the quarter Q4: Within 60 days after the quarter	Y	Finances and Administrative Services	100%	Search Government Contracts over \$10,000
Packages of briefing materials prepared for new or incoming deputy heads or equivalent	88(a)	Within 120 days after appointment	Y	Chairperson's Office	100%	Briefing Note Titles and Numbers
Titles and reference numbers of memoranda prepared for a deputy head or equivalent, that is received by their office	88(b)	Within 30 days after the end of the month received	Y	Chairperson's Office	100%	Briefing Note Titles and Numbers
Packages of briefing materials prepared for a deputy head or equivalent's appearance before a committee of Parliament	88(c)	Within 120 days after appearance	Y	Chairperson's Office	100%	Briefing Note Titles and Numbers
Applies to government institutions that are departments named in Schedule I to the <i>Financial Administration Act</i> or portions of the core public administration named in Schedule IV to that Act (i.e., government institutions for which Treasury Board is the employer)						
Reclassification of positions	85	Within 30 days after the quarter	Y	Human Resources	75%	Position Reclassification

During the reporting period, the CRTC published 96.4% of its proactive publication requirements within the legislated timeline, up from 15% in the 2023-2024 reporting period.

Delegation order

The Chairperson and Chief Executive Officer of the CRTC issued a formal delegation order under the authority of section 95(1) of the *Access to Information Act*.

Through this Delegation Order, the Chairperson delegates the authority to exercise and perform the powers, duties, and functions conferred upon her as the head of the government institution under the *Access to the Information Act*. The delegation applies to the individuals occupying the positions specified in the accompanying schedule. These delegated authorities pertain specifically to the administration of requests and responsibilities under the *Access to Information Act*.

This Delegation Order supersedes all previous delegation orders related to the CRTC, either in whole or in part.

The Delegation Order was signed and came into effect on July 25, 2023.

The signed copy of the delegation can be found in Annex A.

Performance 2024-2025

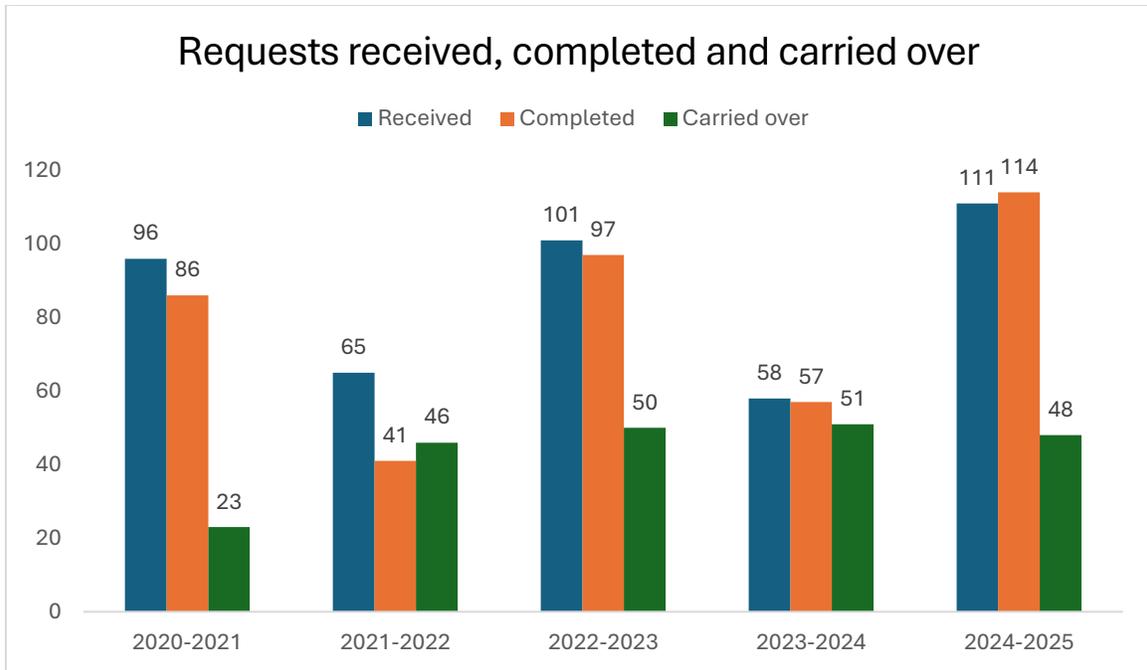
Section 1: Requests under the *Access to Information Act*

Number of requests

In the 2024-2025 reporting period, the CRTC ATIP Office carried over 51 requests from 2023-2024 and received 111 new requests for a total of 162 requests.

At the close of the reporting period, the CRTC ATIP Office carried forward 48 requests, of which 17 are within the legislated timeline, while 31 are past the legislated timeline. Of these 31 requests, none were received during this reporting period and were all carried over from the previous one.

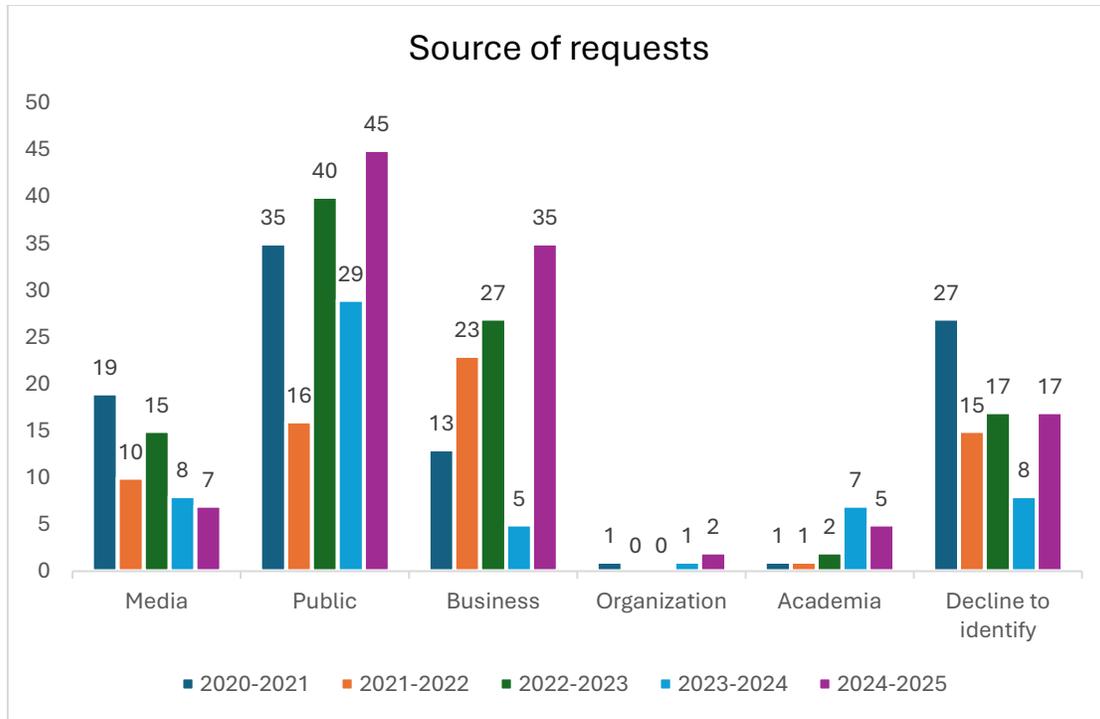
These figures reflect a 91.4% increase in new requests and a 100% increase in the number of requests completed in 2024-2025.



	Received	Completed	Carried over
2020-2021	96	86	23
2021-2022	65	41	46
2022-2023	101	97	50
2023-2024	58	57	51
2024-2025	111	114	48

Source of requests

In 2024-2025, most of the requests came from three main categories of requesters: the public made 45 requests, businesses made 35, and seven requesters declined to identify. Notably, the number of requests from requesters who self-identified as members of the public rose by 55% when compared to the previous reporting period.

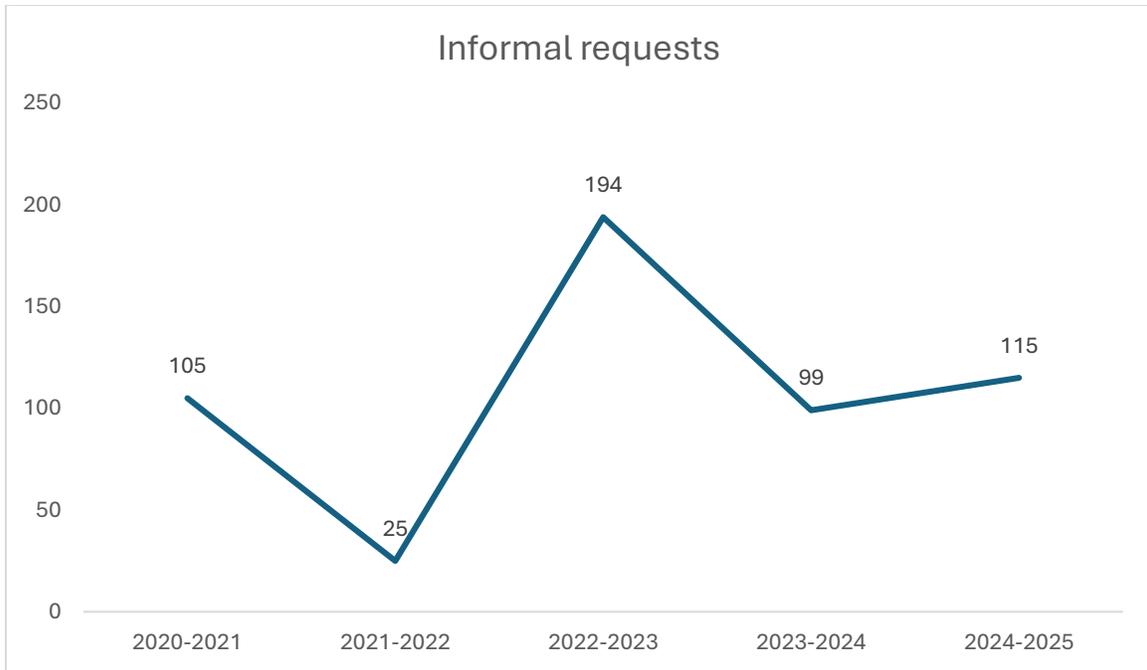


	2020-2021	2021-2022	2022-2023	2023-2024	2024-2025
Media	19	10	15	8	7
Public	35	16	40	29	45
Business	13	23	27	5	35
Organization	1	0	0	1	2
Academia	1	1	2	7	5
Decline to identify	27	15	17	8	17

Informal requests

Informal requests originate from summaries of closed requests. We provide copies of the records at no cost through the Open Government Portal. Requests made through this portal are considered informal and are not subject to the same legislated requirements as those submitted under the *Access to Information Act*.

The number of informal requests received increased by 17% from the previous reporting period, with a total of 115 informal requests processed in 2024-2025 compared to 99 requests in 2023-2024.



Reporting Period	Number of requests
2020-2021	105
2021-2022	25
2022-2023	194
2023-2024	99
2024-2025	115

Section 2: Reasons for declining to act

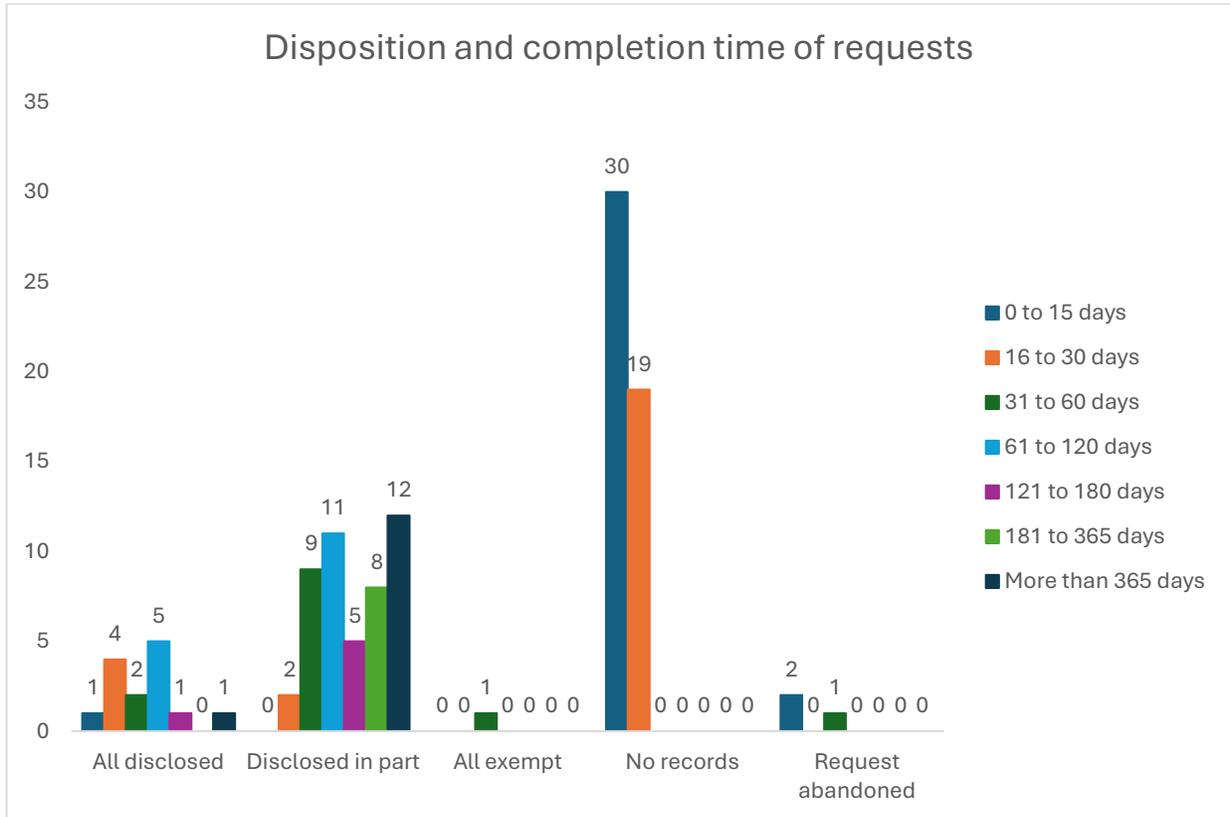
During the reporting period, the CRTC made no requests to the Office of Information Commissioner of Canada (OIC) to decline to act on requests that were vexatious, made in bad faith or an abuse of the right to make a request for access to records.

Section 3: Requests closed during the reporting period

Disposition and completion time

During the 2024-2025 reporting period, a total of 114 requests were completed. Of these, 33 requests were completed in 0 to 15 days and 25 in 16 to 30 days. Thirteen requests were completed within 31 to 60 days, 16 within 61 to 120 days, six within 121 to 180 days, eight within 181 to 365 days, and 13 took more than 365 days to complete.

In terms of the disposition of these requests, 14 were fully disclosed, with the majority completed in under 120 days. A total of 47 requests were disclosed in part, with 20 requiring longer processing times of over 180 days. The most frequent outcome for requests completed within the first 30 days was that no records were found, representing 49 out of the 58 requests finalized during that period.



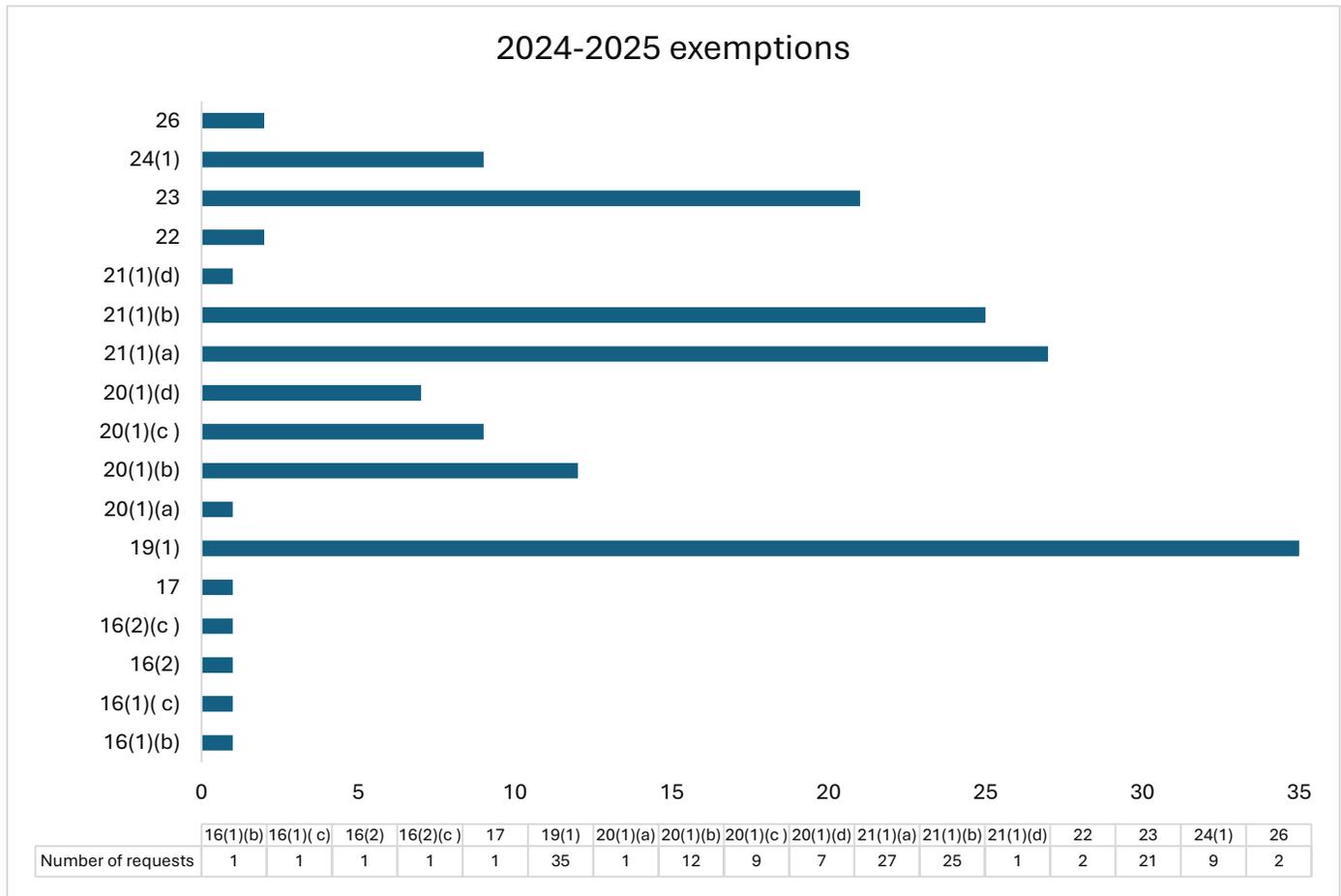
	0 to 15 days	16 to 30 days	31 to 60 days	61 to 120 days	121 to 180 days	181 to 365 days	More than 365 days
All disclosed	1	4	2	5	1	0	1
Disclosed in part	0	2	9	11	5	8	12
All exempt	0	0	1	0	0	0	0
No records	30	19	0	0	0	0	0
Request abandoned	2	0	1	0	0	0	0

Exemptions

Sections 13 through 24 of the Act set out the specific and limited exemptions that may be applied to refuse disclosure of information pertaining to a particular public or private interest. The CRTC makes every effort to disclose as much information as possible and uphold both the spirit of the Act and the severability provision of section 25.

The CRTC makes every effort to disclose as much information as possible and uphold both the spirit of the Act and the severability provision of section 25. The majority of the exemptions invoked in 2024-2025 fell under four main sections of the Act.

Subsection 19(1), a mandatory exemption protecting personal information, was the most frequently used, appearing in 35 requests. This was followed by paragraph 21(1)(a) and paragraph 21(1)(b), both discretionary exemptions related to the operations of government, which were applied in 27 and 25 requests respectively. In addition, section 23, which pertains to solicitor-client privilege, was used in 21 requests. Other exemptions, such as paragraph 20(1)(b) and 20(1)(d), mandatory exemptions protecting third-party information, were used less frequently, appearing in 12 and nine requests respectively.



Exclusions

During the current reporting period, most of the exclusions applied fell under section 69 of the Act, which relates to Cabinet confidences. Specifically, subsection 69(1) was cited in six requests, while paragraphs 69(1)(a) and 69(1)(g) regarding (a), relating to memoranda to Cabinet, were each used in three requests. In addition, section 68(a), which excludes published material or material available for purchase by the public, was applied in two requests.

Format of Information Released

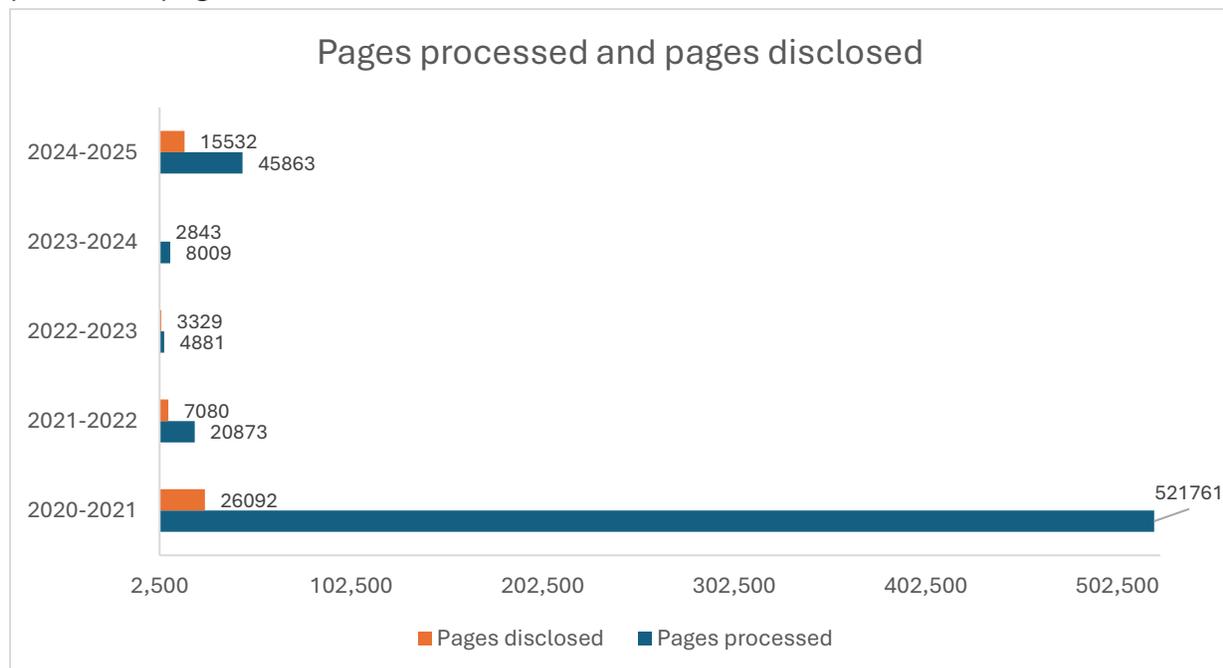
Of the 114 requests completed in 2024-2025, 61 were released in electronic format. For 49 requests, the CRTC found no records relevant to the request. Three requests were abandoned by the requester, and one request was fully exempt from release.

Section 3.1: Complexity

Pages processed and disclosed

In 2024-2025, the CRTC's ATIP Office processed 45,863 pages compared to 8009 pages in the previous reporting period, representing a significant increase of 472%.

In closing a major file this year, the ATIP office contributed to a notably larger increase in processed pages for 2024-2025.



	2020-2021	2021-2022	2022-2023	2023-2024	2024-2025
Pages processed	521,761	20,873	4,881	8,009	45,863
Pages disclosed	26,092	7,080	3,329	2,843	15,532

Relevant pages processed and disclosed by size of request

Of the 114 requests completed during the current reporting period, 65 resulted in records being disclosed to requesters.

Of these 65 records, 35 contained fewer than 100 pages each, accounting for 992 pages; 22 requests contained between 100 and 500 pages, accounting for 5383 pages; Four requests contained between 501 and 1000 pages, accounting for 2801 pages; Three requests contained between 1001 and 5000 pages, accounting for 3686 pages; and a single request exceeded 5000 pages with 33,001 pages.

Other complexities

For the purposes of this report, CRTC’s ATIP Office used the “Other” designation to track the number of requests where a consultation outside of the CRTC was required for information relating to external parties or where a legal opinion was sought. In this reporting period, there was a sizeable increase of both occurrences: 42 requests required one or more external consultation, and 16 requests required one or more legal opinion, up from 12 and three, respectively, in 2023-2024.

Section 3.2 Closed Requests

During the current reporting period, of the 114 requests closed, 96 were closed within their legislated timelines, resulting in an 84.2% compliance. In 2023-2024, of the 57 closed requests, 38 were within the legislated timeline, representing a 66.7% compliance rate.

Therefore, in 2024-2025, we were able to significantly increase our overall compliance rate by 17.5%, reflecting improved efficiency and continued efforts towards meeting the legislated requirements.

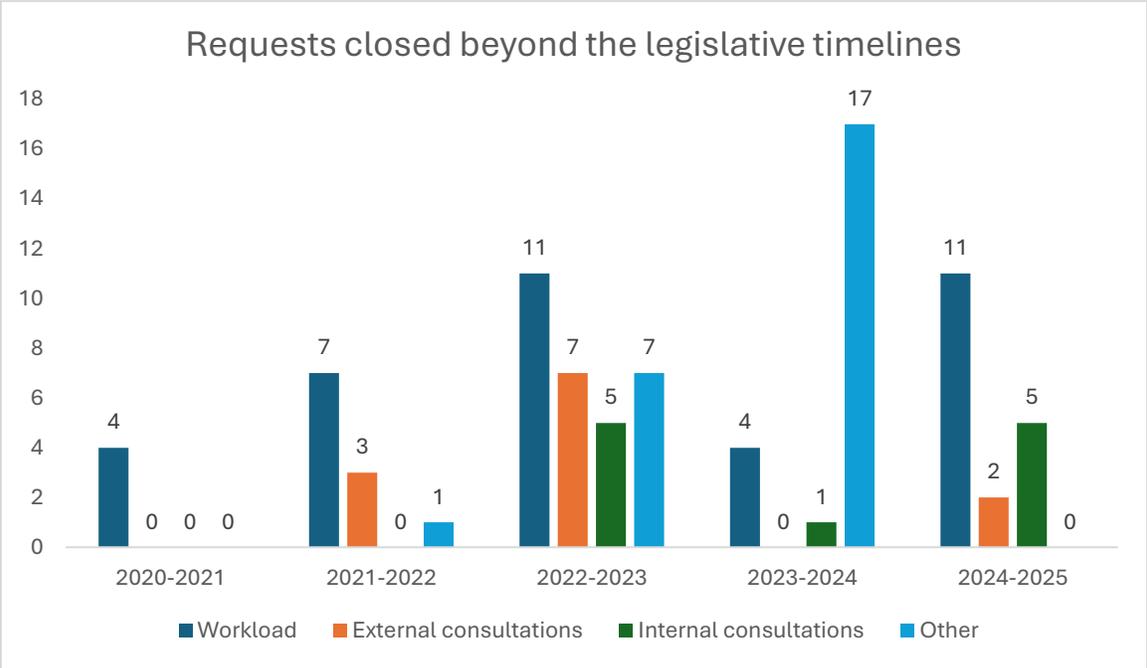
Section 3.3 Deemed refusals

Reasons for not meeting the legislated timelines

During the reporting period, 11 requests were closed past the legislated timelines due to complexity and heavy workload, five were closed past the legislated timeline due to an internal consultation and two were closed past the legislated timelines due to external consultations.

Requests closed beyond the legislated timelines

For all 18 files completed beyond the legislated timeframe, the CRTC ATIP Office invoked time extensions. Specifically, one file was extended by 31 to 60 days, two files by 61 to 120 days, and another two files by 121 to 180 days. Three files required extensions of 181 to 365 days, while the remaining 10 files were subject to extensions exceeding 365 days.



	2020-2021	2021-2022	2022-2023	2023-2024	2024-2025
Workload	4	7	11	4	11
External consultations	0	3	7	0	2
Internal consultations	0	0	5	1	5
Others	0	1	7	17	0

Requests for translation

There were no requests for translation made during the reporting period.

Section 4: Extensions

According to the *Access to Information Act*, an extension constitutes additional time granted to a government institution to respond to an access to information request when specific conditions preclude compliance with the statutory 30-day time limit.

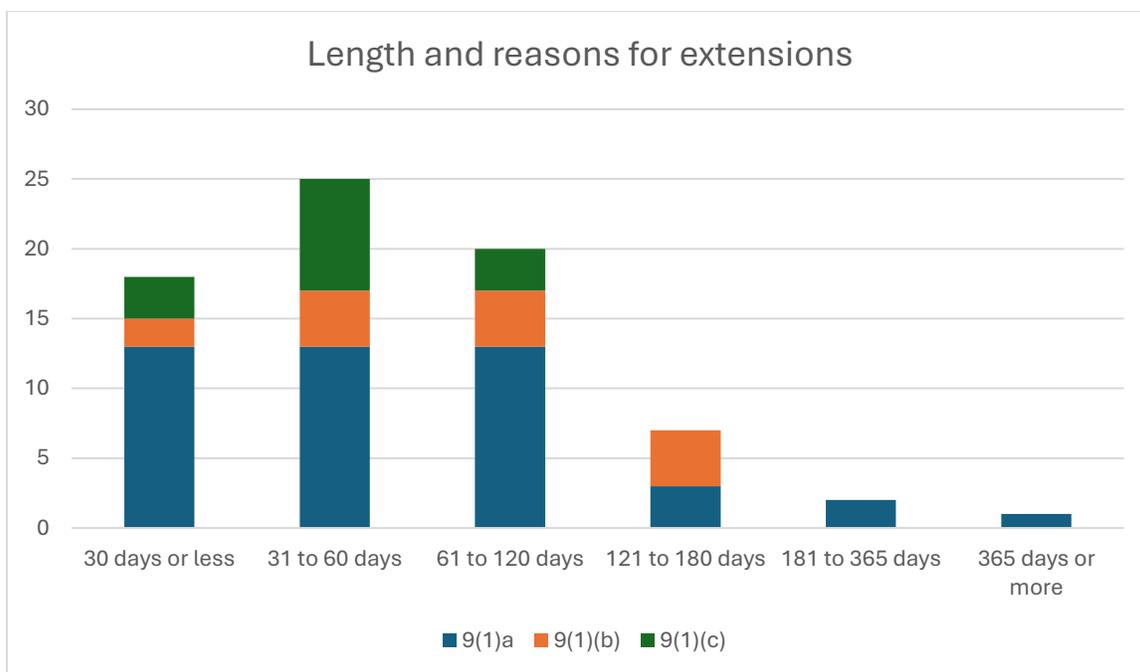
Pursuant to section 9(1) of the Act, an extension may be invoked under the following circumstances:

- Section 9(1)(a): The request involves a large volume of records or requires a search through a substantial number of records, and responding within the original time limit would unreasonably interfere with the operations of the institution.
- Section 9(1)(b): Consultation is necessary to comply with the request, and such consultation cannot reasonably be completed within the 30-day statutory deadline.
- Section 9(1)(c): A notice is provided to a third party under subsection 27(1) of the Act, typically when the request involves information that may affect the interests of a third party.

In such cases, the institution is required to inform the requester of the reason for the extension, the length of the extension, and their right to file a complaint with the Information Commissioner of Canada.

Length of extensions

A total of 73 extensions were taken during the reporting period. Of those 73, 45 extensions were taken pursuant to 9(1)(a), 14 were taken pursuant to 9(1)(b), and 14 were taken pursuant to 9(1)(c).



	30 days or less	31 to 60 days	61 to 120 days	121 to 180 days	181 to 365 days	365 days or more
9(1)(a)	13	13	13	3	2	1
9(1)(b)	2	4	4	4	0	0
9(1)(c)	3	8	3	0	0	0

Section 5: Consultations

Consultations received from other Government of Canada institutions and other organizations

The CRTC received four new consultations within the reporting period. These were all closed. A total of 43 pages were received and reviewed. No consultation request was carried over to the next reporting period.

Recommendations and completion time for consultations received from other Government of Canada institutions

The CRTC ATIP Office successfully responded to three consultations within 15 days, and one response was provided within 16 to 30 days. Additionally, the office recommended full disclosure of records for three consultations, while partial disclosure was recommended for the remaining consultation.

Recommendations and completion time for consultations received from other organizations

No consultation was received from other organizations.

Consultation on Cabinet confidences

During 2024-2025, four files required consultation on Cabinet Confidences for a total of 19 pages.

Section 6: Complaints and investigations

In the 2024-2025 reporting period, four complaints were carried over from 2023-2024 and 18 new complaints were received. Ten complaints were still active at the end of the reporting period. The CRTC ATIP Office is committed to addressing complaints thoroughly and promptly.

The CRTC was not involved in Federal Court cases regarding ATIP during this reporting period.

Summary of key issues and actions taken on complaints or audits

During the 2024-2025 reporting period, the CRTC ATIP Office successfully closed 12 of 22 active complaints for the reporting period, leaving only 10 active complaints.

Training

Throughout the 2024-2025 fiscal year, the CRTC ATIP Office conducted three training sessions. One session was available to all CRTC employees, including management, and two sessions were specifically for employees in the office of primary interest. The CRTC ATIP office continues to highlight the roles and responsibilities of all staff under the Act, providing ongoing individual support through one-on-one meetings.

During the same period, the CRTC ATIP Office undertook an assessment of training needs. This involved consultation with various sectors to identify key areas for development. The goal is to create a comprehensive training program that is accessible to all CRTC employees.

The CRTC intranet, available to all employees, hosts a dedicated section outlining the ATIP Office's roles and responsibilities as well as providing information on the Act and related CRTC policies and procedures. The CRTC ATIP Office remains committed to exploring new strategies to enhance awareness across the Commission.

Policies, guidelines and procedures

Info Source

Info Source is a series of publications that provide details on the Government of Canada and its data collection activities. It supports public access to information and the exercise of rights under the *Privacy Act* and *Access to Information Act*.

The CRTC's Info Source is available on its external website, which also offers information on the CRTC's policies, structure, and contact details. In line with federal proactive disclosure requirements, the site includes travel and hospitality expenses, contracts, job reclassifications, completed access request summaries, and briefing material titles.

The CRTC ATIP Office maintains an internal manual to ensure consistent practices and support new analysts.

Proactive disclosure

During the current reporting period, the CRTC implemented several procedures and systems to meet the proactive publication requirements under Part 2 of the *Access to Information Act*.

We implemented automation processes to optimize workflow and ensure tasks are disseminated promptly to guarantee that proactive publications were completed according to a set schedule. Additionally, we developed comprehensive standard operating procedures, lists, and trackers to ensure all proactive disclosures are published within legislated timelines.

Every step of the process is documented in our data repository to maintain compliance and enhance transparency. These measures collectively ensure that our institution adheres to the legislated requirements and upholds the principles of transparency and accountability to Canadian citizens.

Initiatives and Projects to Improve Access to Information

The CRTC has implemented several initiatives and projects aimed at improving access to information. These efforts include the introduction of automated systems for streamlining requests processing, in addition to the transition to the acquisition of a new ATIP Request Processing Software Solution.

The CRTC is committed to removing barriers that Indigenous people or those acting on their behalf face when they request access to information. This includes promoting the waiver of the five-dollar application fee for Indigenous requesters on its website.

Monitoring Compliance

The CRTC is committed to responding to every ATI request completely and in a timely manner. Therefore, the CRTC ATIP Office holds weekly team meetings to review priorities and any potential issues.

In addition, the team lead holds weekly meetings with each analyst individually to review on-time performance, and weekly meetings with the sectors to receive status updates on outstanding files and retrievals.

Lastly, the senior management team is briefed on a weekly basis to track the progress of all outstanding ATI requests as well as any outstanding complaints. These weekly meetings ensure that the senior management is fully aware of progress on ATI requests and can take immediate action to resolve issues as they arise.

Annex A: 2024-2025 Delegation Order



Conseil de la radiodiffusion et des
télécommunications canadiennes Canadian Radio-television and
Telecommunications Commission

Delegation Order for the Administration of the *Access to Information Act*

I, the undersigned, Chairperson and Chief Executive Officer of the Canadian Radio-Television and Telecommunications Commission (CRTC), pursuant to section 95 (1) of the ***Access to Information Act****, hereby delegate the person or persons holding the position or positions set out in the schedule hereto to exercise and perform the powers, duties and functions of the Chairperson and Chief Executive Officer, as the head of the government institution, under the sections of the Act set out in the attached schedule for each position.

This Delegation Order supersedes all previous Delegation Orders with respect to the CRTC, or any portion thereof.

Ms. Vicky Eatrides
Chairperson and Chief Executive Officer

Date

*R.S.C. 1985, Ch. A-1



SCHEDULE

Access to Information Act Designation Order

Position	Sections of Access to Information Act
1. Secretary General	4 (2.1), 6.1, 7, 8(1), 9, 10, 11, 12(2), 12(3), 13(1), 13(2), 14, 15(1), 16, 17, 18, 19, 20, 21, 22, 23, 24(1), 25, 26, 27, 28, 33, 35(2), 37(1), 37(4), 43(1), 44(2), 52, 68, 68.1, 69, 82, 83, 84, 85, 86, 87, 88, 89, 94.
2. Chief Information Officer	4 (2.1), 7, 8(1), 9, 11, 12(2), 12(3), 13(1), 13(2), 19, 20, 21, 22, 23, 24(1), 25, 26, 27(1), 27(4), 28, 33, 35(2), 37(1), 37(4), 43(1), 44(2), 68, 68.1, 69, 82, 83, 84, 85, 86, 87, 88, 89, 94.
3. Assistant Director Information Management	4 (2.1), 7, 8(1), 9, 11, 12(2), 12(3), 13(1), 13(2), 19, 20, 21, 22, 23, 24(1), 25, 26, 27(1), 27(4), 28, 33, 35(2), 37(1), 37(4), 43(1), 44(2), 68, 68.1, 69, 82, 83, 84, 85, 86, 87, 88, 89, 94.
4. ATIP Coordinator	4 (2.1), 7, 8(1), 9, 11, 12(2), 12(3), 13(1), 13(2), 19, 20, 21, 22, 23, 24(1), 25, 26, 27(1), 27(4), 28, 33, 35(2), 37(1), 37(4), 43(1), 44(2), 68, 68.1, 69, 82, 83, 84, 85, 86, 87, 88, 89, 94.
5. ATIP Officers	7