
Ligado Accessibility Plan

June 2024



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General Application

This Accessibility Plan has been prepared in accordance with the requirements of the *Accessible Canada Act* (“ACA”) and its regulations. This Accessibility Plan applies to Ligado Networks Corp. (“Ligado”). Ligado operates as a wholesale provider of satellite services and does not provide any telecommunications services to end-user customers. The Accessibility Plan includes requirements relevant to Ligado as a wholesale provider.

Ligado has a process for receiving and responding to feedback, including feedback on how accommodations are made to persons with disabilities. Our Accessibility Plan and a description of our accessibility feedback process are available in alternative formats upon request.

You can provide accessibility feedback (including feedback on this plan), request an alternative format of our Accessibility Plan, or request a description of our feedback process in the following ways:

- » Completing an [online form](#)
- » Via Email: compliance@ligado.com
- » Via Phone:
 - Corporate Headquarters (Reston, VA): [877-678-2920](tel:877-678-2920)
 - Operations Office (Ottawa, ON): [613-742-0000](tel:613-742-0000)
 - Customer Support: [800-216-6728](tel:800-216-6728)
- » Standard Mail: 1601 Telesat Court, Ottawa, ON K1B 1B9

For more information on Ligado’s website, visit [Ligado.com/accessibility-feedback](https://ligado.com/accessibility-feedback)

The person responsible for receiving accessibility feedback at Ligado is the [Vice President, Risk & Compliance](#).

Feedback can be provided anonymously.

[Principles of the ACA](#)

Ligado’s Accessibility Plan has been written in accordance with principles set out in the ACA (see [Appendix A](#)).



Executive Summary

Ligado's accessibility policies are grounded by the principles of dignity, independence, integration, and equal opportunity.

We will work towards the goal of all persons having the same opportunities.

We will provide all persons with a disability meaningful options to engage with our business.

We will ensure that individuals of all abilities have the same access to our facilities.

Accessibility Statement

Ligado operates as a wholesale provider of satellite services and does not provide any telecommunications services directly to end-user customers.

Our facilities are not customer-facing; however, we strive to identify any accessibility barriers that may exist for our employees and visitors to our facilities and locations.

We are committed to treating all people with dignity and in a way that respects their independence. Our goal is to improve how we connect with each other – including persons with disabilities. An important part of achieving this outcome is to identify, prevent, and remove barriers experienced by persons with disabilities. When requested, we will offer accommodations to meet the needs of persons with disabilities, including, but not limited to:

- » offering different forms of communication
- » allowing the use of personal assistive devices
- » welcoming service animals into Ligado's facilities
- » permitting a support person to accompany any individual with a disability.

Consultations

Ligado's facilities are not customer-facing, so our consultation approach is focused on identifying accessibility barriers experienced by employees of Ligado and any potential visitors to our facility. We provide varied methods for engagement to meet these needs including language of choice and permitting employees to identify a preferred format for engagement.

The information we gathered through employee surveys enriched our learning experience and helped prioritize the actions that are central to our Accessibility Plan. As part of our consultation approach, we established a team to make accommodations to meet the needs



of persons with disabilities. We also conduct interviews with team members who identify as persons with disabilities to ensure their needs are met.

Key Areas

Ligado's Accessibility Plan reflects barriers we identified as part of our consultation approach and details the actions we will take to identify, prevent and remove such barriers experienced by persons with disabilities.

We value and understand that this work is ongoing and that we must continue to take steps to improve and to address any new issues.

Our initial actions will focus on the areas outlined in the sections below. We will provide updates on our progress annually and adapt our plans as we identify new barriers and learn from our progress.

Employment

Resolving employment-related barriers helps ensure everyone has the same employment opportunities at Ligado. We are committed to a safe and supportive workplace and promoting a culture that values diversity, equity, inclusion and belonging.

Identified Barriers:

We identified that there is a need for greater engagement, promotion, and communications to support accessibility, encourage self-disclosure and enhance a supportive workplace culture and community. Employees can benefit from better awareness of the available accommodations – or the challenges experienced – by persons with disabilities.

Actions:

- Promote forums for collaboration, information sharing, and discussion.
- Increase awareness of Ligado's accommodation process for employees.
- Use internal feedback and consultations and collaborate with persons with disabilities to ensure that accessibility standards are integrated across our business – including workplace policies, employment standards, programs, and work environments.
- Continue to create awareness of accessibility to foster a more inclusive workplace.
- Continue to enhance our accommodation processes.
- Continue to evaluate how well our processes for workplace accommodation are performing.
- Continue to improve how we engage and collaborate with persons with disabilities.



The Built Environment

Addressing barriers related to the built environment helps us ensure that people using our building have barrier-free access. We will continue our efforts to retrofit existing spaces and improve planning for new builds. We will work with our employees to better understand and address barriers experienced by persons with disabilities.

Information Technologies

By addressing information and communication technology-related barriers, we can achieve a high standard for digital accessibility. We apply a continuous improvement approach that endeavors to keep pace with technology advancements in our society. Our actions include plans to identify and resolve barriers found in our websites, mobile applications, networks, and telecommunication and computer systems used by customers and team members.

Communication, other than IT

By addressing communication-related barriers, we will improve the accessibility of the documents that we create at Ligado. Our brand guidelines will provide direction on how to create documents and advertising that promote our products and services in a way that meets accessibility requirements.

The Procurement of Goods, Services and Facilities

We endeavor to ensure our procurement practices address accessibility procurement barriers. When interacting with new and existing suppliers, we communicate our accessibility expectations and requirements.

The Design and Delivery of Programs and Services

Ligado operates as a wholesale provider of satellite services and does not provide any telecommunications services directly to end-user customers. We work with our wholesale customers to ensure that their end-user customers are able to access our services without barriers.

Transportation

Transportation does not currently apply to Ligado's operations.



Regulatory Conditions

As required by subsection 51(1) of the ACA, we have set out the following applicable conditions and provisions:

Conditions under section 24 or 24.1 of the Telecommunications Act

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

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

Conclusion

We believe in our obligation and duty to make a real difference for persons with disabilities by addressing the barriers described in our Accessibility Plan. We are motivated by the opportunity to improve accessibility for our employees, and to do our part to realize a barrier-free Canada.

As we implement our plan, we will continue to work and consult with persons with disabilities. We will publish an updated Accessibility Plan every three years and communicate updates by publishing interim progress reports every year in between, in accordance with the ACA.

Appendix A - ACA Section 6, Principles

In preparing this Accessibility Plan, we have taken into account the principles set out in section 6 of the ACA:

- (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.

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 of the *Telecommunications Act* to which Ligado 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 Ligado.

Ligado operates as a wholesale provider of satellite services and does not provide any telecommunications services to end-user customers. This Appendix includes requirements relevant to Ligado as a wholesale provider and does not include requirements that have not been in force for at least three months before the day on which the Accessibility Plan¹ must be published or expectations/encouragements, which do not rise to the level of imposed conditions.

1. Alternative Formats

- Telecommunications Service Providers (“TSPs”) must provide paper bills upon request at no charge to customers who self- identify as a person with a disability.²
- Canadian carriers must provide bills, bill inserts, and information setting out the rates, terms and conditions in alternative accessible formats, such as in braille or large print, for people with a visual disability.³
- 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.⁴

2. Website Accessibility

- TSPs must make the information on telecommunications services on their websites accessible to the point of providing a reasonable accommodation for persons with disabilities.
- TSPs must have an easy-to-find home page link to the accessibility section of their websites, if their websites include such sections.⁵
- Accessibility plans, progress reports, and descriptions of feedback processes published under the ACA must be published in a way that meets WCAG guidelines.⁶

¹ According to the *Accessible Canada Act* (S.C. 2019, c. 10), section 51(6).

² Telecom and Broadcasting Decision CRTC 2022-28, *When and how communications service providers must provide paper bills*.

³ Telecom Order CRTC 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*.

⁴ CRTC Accessibility Reporting Regulations (SOR/2021-160), sections 24, 27, and 31.

⁵ Ibid., paragraph 57.

⁶ CRTC Accessibility Reporting Regulations (SOR/2021-160), sections 21, 26, and 30.