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Ms. Danielle May-Cuconato
Secretary General
Canadian Radio-television and
Telecommunications Commission
Ottawa, Ontario
K1A 0N2

November 16, 2016

Our reference: 1011-NOC2016-0293

Dear Ms. Danielle May-Cuconato,

Re: *Review of the Wireless Code, Telecom Notice of Consultation 2016-293-1 Reply Comments to CRTC Request for Information*

In our response to the RFI participants, we will only focus on our response to the answers to one of the questions the companies were requested to answer in Appendix 2 of the Wireless Service Providers' (WSP) responses to Question 4:

Deaf Wireless Canada Consultative Committee (DWCC) proposed that the Wireless Code should require WSPs to create videos in American Sign Language (ASL) and La langue des signes québécoise (LSQ) to explain common terminologies used in contracts.

Q4. Provide your views, with supporting rationale, on the feasibility, including the cost and resource implications, of this proposal.

We have reviewed the eight (8) companies' responses to this question.

DWCC would like to further clarify, we do not expect that the WSP's each to:

- 1) create a whole contract in ASL and LSQ, but instead create and collaborate on a list of vocabulary of commonly used vocabulary or terminology in general WSP contracts with customers

2) create and fund the video productions themselves

It is DWCC's view, in agreement with Bell, that this would be a duplicity issue and an inefficient use of funds.

What DWCC is proposing is that some unifying group (CRTC, CWTA or CCTS) or funding mechanism (Telecommunications Accessibility Fund - TAF) be created that is centralized, could fund an ongoing project that can produce ASL and LSQ videos to produce common contract vocabulary. This will provide consistency and have the videos in a centralized location.

In this way, of having it streamlined the videos will have a centralized and unifying location, such as suggested by Bell: www.wirelessaccessibility.ca, and have YouTube video links ready to share with all the WSPs to embed on their websites. Project managers will be responsible to share the links with all WSP's and DWCC will be happy to embed and share the links on DWCC's website and Facebook Page.

It can be called "Deaf Digital Literacy Project," and allow for different groups to do an application grant process so the group with the most reasonable price and resources can apply and be outsourced to do this work. Perhaps like a Request for Proposals (RFP) process. You may find groups bidding or applying for this project might not be as expensive as you all appear to be concerned about. It may not necessarily be a large budget and to show this, look at this way, the DWCC managed to produce the 38 videos in our previous survey project on a small budget - only \$4000.00. Depending on the number of terms that need to be defined, such as "prepaid" and "postpaid," the budget can and will vary. In reality, from experience, starting up such a project may require more funds, such as \$20,000, but only when it is done the first time, as an ongoing contingency budget would be less, from \$5,000-\$10,000. So this is not a project in the millions, and should be quite feasible for the larger WSP's to assist in funding. DWCC can and will gladly prepare a draft of such a proposed video project budget, if requested, even as an undertaking, or prior to the public hearing.

The scope of the project would be to produce high quality videos, consultative research, ASL and LSQ consultants, and collaborations with various WSP's and following the parameters of the project hosted by the centralized host of the project (CWTA, CCTS, CRTC). This project would achieve the goals for true accessibility provisions for all that include the ASL and LSQ customers and to ensure functional equivalency. This same fund can also spearhead the videos explaining and clarifying about complaint systems, as previously proposed to the CCTS. Depending on the project, the time management, project management, consultation and consensus on terminology to define, that is what the cost of the fund will be determined by.

DWCC does not want to see this as limited to existing exclusive contracts. Past videos done by the CWTA or Bell have not conformed to video standards of the inclusive Deaf community

which includes hard of hearing and deaf-blind. DWCC observes that specific video requirements have not been met. It is our observation that what is being done is not working. Therefore, we want an open application process. We appreciate the idea that CRTC, CCTS, or CWTA could take this on by providing the funding but we feel that the actual project management should be run from top-down by the Deaf community people themselves as they know and understand their community members best, working in contract collaboration with the host of the project funding.

Yes, we envision that groups like DWCC can also apply for this funding if they are willing and able to, if we are given an opportunity to apply. In response to Rogers comments, at the moment we are not financially equipped to undertake such a project, we need more funds before we can do this. We did start on some ASL and LSQ basic wireless vocabulary but due to lack of funds we have not been able to finish. This is why we propose such a project and special grant be created, and recommend it funded and paid for by the WSPs collectively. We agree with Bell in their RFI response, page 53: "A single set of videos developed as an industry initiative...would promote consistency."

In this way, of having it streamlined the videos will have a centralized and unifying location, such as suggested by Bell: www.wirelessaccessibility.ca, and have youtube video links ready to share with all the WSPs to embed on their websites. Project managers will be responsible to share the links with all WSP's and DWCC will be happy to embed and share the links on DWCC's website and Facebook Page.

DWCC envisions this to be an ongoing fund as technology changes and evolves. Setting and allocating a fund for these videos with a set annual amount may be necessary, just so it is available when needed. Rather than re-opening for applications multiple times or RFP for different phases of the project, DWCC proposes a specific set-aside annual amount (\$5,000-\$10,000) as a form of a contingency fund to ensure to meet the needs.

Additionally, DWCC needs to remind all parties, to re-visit previous submissions in for example proceedings CRTC TNC 2015-134 and earlier, about the suggestion and solution recommended by various parties, such as the Canadian Hearing Society (CHS) and our parent organization, the Canadian Association of the Deaf (CAD-ASC), whereas the concept of forming such a structure as a Telecommunications Accessibility Fund (TAF) was recommended whereas WSPs can pay and projects such as the *Deaf Digital Literacy* proposal here can apply for funding. This model would be similar to the current Broadcasting Accessibility Fund (BAF) which granted funds for projects in application. Please seriously consider this as another **solution** compared to unifying centralized CCTS, CWTA, and CRTC, as this it would be a wise delegation of oversight and the optimum solution. **It CAN be possible!**

In regards to WSP comments about *SRV Canada VRS*, please remember that this is a phone service, a telecommunications service, and DWCC wants to point out that this comment totally misses the point. Deaf people prefer face to face customer service and to visually see and touch smartphone products before purchasing so utilizing the VRS service would hardly meet the Deaf community's cultural and language preferences. Direct Video Calling (DVC) communication customer services is another suggested means of customer service which the DWCC recommends, and have repeatedly suggested in other proceeding submissions.

DWCC's stance that ASL and LSQ videos defining and describing common terminology within wireless service contracts and the opportunity for signing staff or on-site sign language interpreters, even through VRI, at designated Centres of Accessibility vendor sites, is preferable by many in our Deaf Community. This would simultaneously meet the Wireless Code's requirement for alternative formats.

DWCC appreciates the eight WSP responses in this RFI phase, we read and heard the concerns and ideas. With this answers we are providing, we sincerely hope that this clarifies and answers the supporting rationale, feasibility and funding implications of this proposed project: *Deaf Digital Literacy*. DWCC will be pleased to consult if there are further questions.

Submitted by:

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Chair
Deaf Wireless Canada Consultative Committee

Nicole Marsh
Secretary
Deaf Wireless Canada Consultative Committee

cc: Frank Folino, President, Canadian Association of the Deaf
Meghan McHugh, Representative, Canadian National Society of Deaf-Blind
Gary Malkowski, Canadian Hearing Society
All parties in Review of Wireless Code CRTC TNC 2016-293