



FINAL SUBMISSION

Review of the regulatory framework for text-based message relay services

CRTC TNC 2017-33

July 18, 2017



Website: deafwireless.ca | cad.ca | deafblindcanada.ca
E-mail: lisa@deafwireless.ca | ffolino@cad.ca | mchugh.mm@gmail.com

18 July 2017

Ms. Danielle May-Cuconato
Secretary General
Canadian Radio-telecommunications Commission (CRTC)
Ottawa, ON K1A 0N2

Re: CRTC TNC 2017-33: Review of the regulatory framework for text-based message relay services, File Number [1011-NOC2017-0033](#)

Dear Ms. May-Cuconato:

Please find the joint intervenors' Final Submission for this proceeding focused on text-based message relay services. Our parties' would like to respond to both the interventions and reply comments in this proceeding.

Before we begin, we are collectively, for ease of wording, naming the joint parties (the Canadian Association of the Deaf - Association des Sourds du Canada (CAD-ASC) and Canadian National Society of the Deaf-Blind (CNSDB) conjointly termed as 'DWCC' for technical formatting, as suggested in the TELUS Reply Comment document.

Additionally, we categorize consumers of TTY and IP Relay Services as Deaf, DeafBlind, Hard of Hearing, or DDBHH, which also includes: late deafened, severely hard of hearing and oral deaf Canadians. DWCC also recognizes that people who have difficulty with their speech also utilize these relay services.

1. It appears, generally the companies forget that when DWCC responds in proceedings, it is usually based on the majority of a minimum of 22 DWCC members' common experiences and not on one person's account. DWCC includes CAD-ASC and CNSDB members' experience when responding as well. Additionally, we note that some companies' focused on our first intervention response believing it was only one incident, when in fact, we have a wide range of 437 survey respondents sharing similar experiences. Basically, many of these responses aligned with what DWCC had said in the first intervention.
2. DWCC notes that some companies have become rather "defensive" in their Reply Comments. Based on the DWCC survey results, there are more than 'one incident', in fact, survey respondents have said the same thing. This does not mean necessarily pointing the finger at any one service provider, but inclusive of the whole entity of Service providers.
3. 90% of these responses did not name which company the issue was, and 10% were very specific with the company. This is not in our control when we do a survey. DWCC

is not able to determine which company the comments are made in response to which service provider. DWCC does not know how widespread the issues are until we get the respondents answering confirming or adding other issues we are unaware of. These are all of the service provider consumers and it is DWCC hope that the companies would listen to feedback. After all, they have not had any doors open to feedback for seven years, there have been no system improvements to allow consumers to have reduced frustrations.

4. In our survey report, DWCC collected hundreds, if not a thousand, of 'anecdotal' information with handwritten or typed comments from respondents. Many of those that were repeated 10-20 times and with these repeats our group chose the wording that best described from these responses. If companies want to see the full document with ALL of the anecdotal accounts that DWCC submitted, we will gladly share this document, in which we will clear all of our inter-committee commentaries that assisted us in choosing the quoted experiences, and just leave it as raw for your perusal.
5. It is correct DWCC separated our responses of text based relay services for the reason that TTY is primarily utilized by Deaf-Blind and senior citizens and primarily those that are not technical savvy. DWCC kept separate those that prefer not to learn new technology and on the other hand those who are keen on evolving technology, and embrace IP Relay Services.

Direct Phone Number Requirement

6. As a point of clarification, DWCC responds that the service provider companies appear to be misunderstanding that DWCC stated that landline is required for TTY. DWCC was specifying and referencing to IP Relay Services in regards to the landline requirement conundrum issues, and it did not have to do with TTY.
7. Technically, for the TTY machines, the only way to use them is to have a landline from the wall, either ADSL, dial-up, or through cable account phone lines. As noted by TELUS, that customers are required to "subscribe to some sort of wireline or wireless access to the PSTN that can connect to a TTY machine."
8. There appears to be a system in place where the person registers for an IP Relay account and it is required to supply their phone number in order to register. This is what DWCC is referring to that is frustrating the consumers. There is a requirement there regardless of what the companies are saying. Please refer to the *Appendix F: Canadian IP Relay Registration* in the [survey report](#) that describes our evidence indicating that some of TSPs still requires DDBHH customers to provide their phone number for the registration.
9. There must be an improved system in place where it is easier for hearing callers to call the DDBHH IP Relay consumer. A number they can dial and be redirected to an IP Relay service. Additionally, there must be an easier way for callbacks to re-connect if there is a disconnect between the DDBHH consumer and the operator while the hearing person is still hanging online on the other end.
10. It needs to be more clearer that not only do DWCC members and its joint intervenors, but also many DDBHH consumers in Canadian society regardless of which service provider, that object to the phone number requirement. Also, objecting that there is no alert system in place when we are away from the device/computer.
11. DDBHH consumers do not want to be tied to their desktop and laptops, they want to be more mobile, anywhere and everywhere just like others in Canadian society. This is KEY!!

New technologies

12. Fact is, not very many people are aware of the ability to use their smartphone with additional cords or adapters with a TTY machine.
13. Applications or 'apps' are more commonplace for a more modern TTY software. DWCC has done its research and found several threads of discussion, including [this link](#) and it appears that the issue is between Apple and the wireless carriers.
14. According to the link we found, it is unclear whether Apple or the wireless service carriers are the issue. However, if the wireless service providers refuse to investigate and communicate with Apple about this possibility, DWCC asks that CRTC encourage this to be made possible, because at the minimum, short term solutions need to be made.
15. DWCC requests that wireless carriers move forward and investigate making this feature app available for people with iPhones. If you may recall in our 2016 [Deaf Wireless Survey](#), many DDBHH Canadians at 58% are iPhone users and it would be worthwhile for these Canadians and those who are speech impaired to have this available to them for greater independence and functional equivalency on par with other Canadians.
16. What harm is there? As the Apple iOS TTY application software is already developed, it is ready-made, and it is to DWCC's understanding, the only issue remaining is that it just needs to be made compatible to wireless systems in Canada. If we are reading correctly, the wireless carriers are the ones that have to work to make it enabled in Canada. If our American counterparts have access to this option of TTY feature on their iPhones why can't we too? iPhones are in Canada too.
17. DWCC recommends this initiative be enabled, especially while we wait for Real-time Text (RTT) to be introduced into Canada in 2020.

Applications & features

18. Meanwhile, survey respondents/consumers are obviously frustrated, and it is up to the company to make sure the consumers have a better experience using their services. User-friendliness is paramount.
19. DWCC still maintains and strongly insists that an IP Relay Service application ('app') needs to be developed for the consumer's use. See our [recommendation #1](#) (p. 45)
20. As a straightforward point of reference, it is from DWCC's collective experience, IP Relay Services on smartphone and tablet devices is emphatically **awkward** with its non-responsive and non-cross device or cross-platform internet browser. Consumers have to "swipe" the long edge of the screen to go back to the beginning of the screen on the left, as you type the next line. The whole IP relay interface does NOT fit in the smartphone screen. And there is great difficulty in having the return key work on the internet browser for some reason. Please see screenshots of such a scenario for evidence of this in [Appendix A](#). This was done by one of the DWCC Committee members using their iPhone to access TELUS IP Relay Services. With these images you can see visually the DDBHH consumer experience on a smartphone. We hope the images provide greater clarity of what experience DDBHH are describing
21. Therefore, an app is the biggest solution for the ease of use and to set up alerts and notifications. It cannot be hard to make this happen in this "app-everywhere" society!
22. The biggest issue for those with visual needs is customization with adjustment of background, colours, and font types and colours. **This must be made possible.**
23. DWCC recognises that the logistics behind the IP Relay can be challenging but DWCC points out that service must improve as it has been seven years since its inception.

Applications are booming, they are everywhere, everywhere you look, you will find apps. It is a simple solution to all the issues of frustration, especially those outlined [here](#).

24. If such an app such as Messenger can be used, surely an app created for IP Relay is possible.
25. Finally, DDBHH Canadians really do not want to be tethered to their desktop or laptop computers. Nowadays, it is a mobile society!

Emergency Access

26. DWCC collectively maintains that TTY machines are still slowly disappearing from phone booths at various places such as Calgary airport, aligning with the timelines of payphone stations disappearing. This is being noticed at BC Ferries, on the ferries and at the terminals. It was only a statement of fact supporting the decline of the TTY use.
27. However, DWCC is concerned that if a DDBHH customer is at least 20 feet away from TTY payphone and some nature of emergency occurs, there will be safety issues. All accessibility groups emphasize and stress for this exact reason, that there must be several options available wirelessly that are accessible with ease to use for emergency scenarios. These options include initially enabling IOS TTY, adding an IP Relay App, and ensuring that TTY payphones continue to be available until new technologies come into the landscape (RTT). This is to seriously confirm how critical **functional equivalency of telecommunication access** is made available to DDBHH with access and inclusion like other Canadians. **911 must be implemented in all possible avenues to save lives.**

Publicity and Awareness

28. According to the Bell's letter to CRTC on [MRS numerical information](#), even the IP Relay numbers have decreased, and it is DWCC's belief that lack of promotion and marketing may be the culprit. In the survey analysis report, a link was provided to an IP Relay video advertisement which Bell created, using real people including Deaf ASL or LSQ consumers. More of this type of excellent public service announcement type or dramatization videos needs to be done. There needs to be an increased effort to share it around on much wider media platforms such as television advertisements rather than just simply through websites. DWCC members cannot recall seeing any such specific advertising for IP Relay Services. Please refer to Recommendations #14 and #15 in our [survey report](#) (pages 9 & 48).
29. An app will benefit the consumer greatly, in the case that notifications and alerts can be set up within the app and device settings. This will truly give an incentive for the growth of IP Relay consumers.
30. It is DWCC's belief that the number of users will increase, with proper promotion and marketing, that the IP-Relay app will be more in demand than using an online browser if promoted widely.

Reporting & Reviews

31. DWCC would like to see visual graphs of the usage of text based services and would appreciate that these are reported on an annual basis and are available to us consumer groups to learn about text based relay trends in Canada.
32. Generic industry information specific to each TSP with numbers and money is useless to our consumer groups as they are filed in confidence to the CRTC. Consumer

groups don't see them, instead the usage trends are desired. Declining or increasing stats for each company. Examples of such statistics could be: 1) feature usage 2) usage feedback trends, 3) response times.

33. Review of text based relay systems needs to be conducted again in three years considering the long list of issues that DWCC discovered in the survey analysis report.
34. Our three consumer groups must reiterate that we do not want to wait another seven or eight years. After this one there needs to be another one in at least three years to ensure that the IP Relay services are progressive with technological advances, and that suggestions for improvements and the efforts have been put into place and then at that point, feedback is given for the updates or upgrades.

Clear complaint mechanism

35. Our joint consumer group still believes that there is no clear complaint system, and no one place to e-mail or specific contact information about IP Relay issues. There needs to be a complaint mechanism in place to manage such complaint and inquiries and an accessible one.
36. Access to complaint, feedback and inquiry system is paramount. Provide ASL and LSQ face to face customer service. Hire deaf people. There are so many skilled DDBHH individuals out there in Canada who are unemployed because no one will give them a chance. These are the very people that these jobs can be created for as customer service agents on the front line handling customer inquiries from the people using the same language as them.

Systemic Design

37. In the US there is currently only one IP Relay Service provider left, Sprint. And Sprint has an app available. They make it easier for their consumers. Why can't the IP Relay services in Canada make it easier for their consumers?
38. If the TSPs disagree on the concept to become more streamlined, or perhaps, to merge, due to their financial benefit then CRTC needs to ensure that there are inclusion measures in place.
39. Each TSP must establish an Accessibility Advisory Committee to include DWCC, CAD-ASC and CNSDB so feedback comes directly from consumer groups and that decisions for upgrades and updates are inclusive from our consumers' viewpoints. And that these groups are to ensure that reporting & review, and updates are implemented and not ignored.
40. It is the collective groups' view that we are being left out and we are not included in feedback as indicated, here in several examples:
 - a. CRTC's refusal to do ASL and LSQ videos to promote the proceeding, hence the low turnout for consumer responses for this telecom issue of text based message relay services.
 - b. Systematic designs such as *Text with 911* are being made without the people who use the very services?? It doesn't make sense logically. Expensive mistakes are being made!
 - c. We have only seen this with the Telus-Sorenson VRS trial, with a reasonable number of participants, at 311 in total, and a very small pool of audio-visual community people ([27 people to be exact](#)) helped decide for for the *Text with 911* systematic design. The ASL and LSQ users were left out.

41. Where are the alpha and beta testing and feedback opportunities being made available for new technological advances in Canada? Especially for T 9-1-1, mock calls for practice for real life scenarios for sandbox testing.
42. It is recommended that IP Relay Service application developers include alpha and beta testers in its design phase that are DDBHH Canadians and have the ***national*** (emphasis: ***not*** provincial) consumer groups such as DWCC, CAD-ASC and CNSDB assist in recruitment and distribution of these testing opportunities to ensure **inclusivity**.

Conclusion

43. DWCC, CAD-ASC and CNSDB want to reiterate that our survey report indicates that text based Message Relay Services (MRS) in Canada needs to be improved based on our concerns and the recommendations that were drawn.
44. Such relay services need to continue to available especially for the DeafBlind, and senior citizens, and technology must be capable of backward compatibility to the physical TTY machines that are still being used, and the ability to be hooked up to braille technology, to ensure that **no one is left behind**. This is Canada's telecommunications challenge.
45. Accessibility consumer groups are tired of being an afterthought here in Canada whereas FCC's former Chair, Tom Wheeler took an even greater effort to ensure that **'Accessibility is a forethought and not an afterthought.'** He was a brilliant man, and saved hundred of thousands, if not millions of dollars. For inspiration, please take the time (13:17) to view Elaine Roy's TedX speech entitled '[When we design for disability, all benefit](#)' to understand the importance of disability inclusivity in daily matters.
46. **Nothing about us, without us.**

Deaf Wireless Canada Consultative Committee, Canadian Association of the Deaf-Association des Sourds du Canada and Canadian National Society of the Deaf-Blind thanks the telecoms for sharing their perspectives, and the CRTC for allowing us to participate in this proceeding and obtain greater numbers of consumers' perspectives. If the CRTC has any questions that appear to be left unanswered, please do not hesitate to ask our collective group.

Submitted by:

Lisa Anderson-Kellett
Chairperson
Deaf Wireless Canada
Consultative Committee
(DWCC)

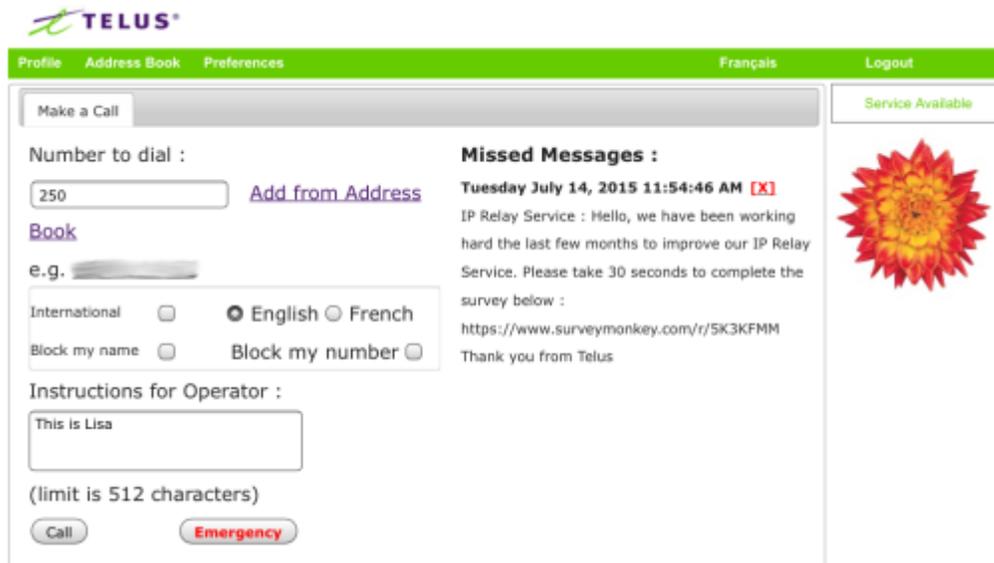
Frank Folino
President
Canadian Association of
the Deaf - Association des
Sourds du Canada (CAD-ASC)

Megan McHugh
President
Canadian National Society
of the Deaf-Blind (CNSDB)

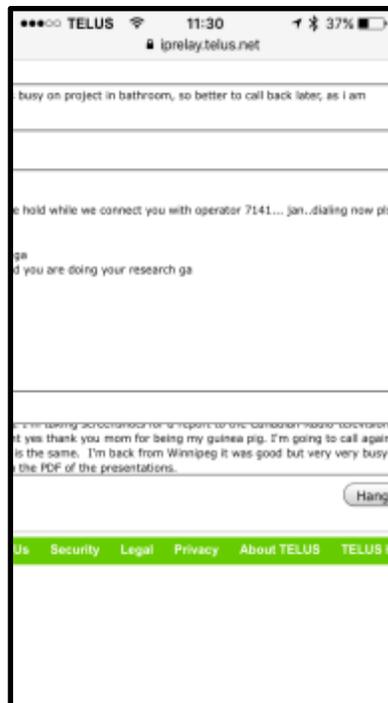
Cc: Michael J. Stewart, Data Analyst
Jeffrey Beatty, Technical Consultant
Nanao Kachi, CRTC
Bradley Gaudet, CRTC

APPENDIX A - Screenshots of IP Relay on Smartphone (iPhone)

Horizontal view



Vertical View - had to scroll screen right to left then left to right to carry on conversation, screenshot 3 times:



*** END OF DOCUMENT ***