



**SEP 25 2017**

Our reference: 1011-NOC2017-0033

BY EMAIL

**Subject: Telecom Notice of Consultation CRTC 2017-33, *Review of the regulatory framework for text-based message relay services***

Dear Sir/Madam:

As you are aware, in [Telecom Notice of Consultation \(TNC\) 2017-33](#), the Commission initiated a proceeding to review the regulatory framework for text-based message relay services (MRS).

As set out in [TNC 2017-33-1](#), the record closed on 14 July 2017. However, based on a preliminary analysis of the record to date, Commission staff finds it necessary to issue supplementary requests for information (RFIs) to telecommunications service providers (TSPs) that are parties to TNC 2017-33 and thus reopen the record.

In [a letter](#) dated 16 August 2017, the Canadian Association of the Deaf, the Deaf Wireless Canada Consultative Committee, and the Canadian National Society of the Deaf-Blind, collectively the DWCC et al, filed a procedural request seeking to file supplementary information on the record of the above-noted proceeding.

DWCC et al's procedural request was supported by the Canadian Hearing Society, Maple Communications, and le Conseil provincial du secteur des communications. On 18 August 2017, TELUS Communications Company filed a response advising that it does not support the request.

As the record is being reopened in order to issue supplementary RFIs, Commission staff determined that it would be appropriate to allow DWCC et al to file its supplementary information. As such:

- On 8 September 2017, Commission staff issued [a letter](#) to DWCC et al approving its procedural request. The letter also noted that revised timelines and process would follow. DWCC et al has since filed its [supplementary information](#) on 11 September 2017.
- In the Appendix to this letter, Commission staff is issuing supplementary RFIs to the TSPs that are parties to TNC 2017-33.

### **Additional Process**

TSPs are to respond to the attached RFIs, by **10 October 2017**.

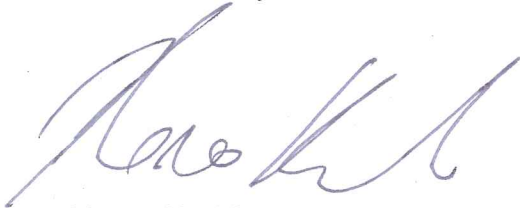
All parties may comment on the supplementary information filed by DWCC et al by **17 October 2017**.

All parties may comment on TSPs' responses to the questions outlined in the RFIs by **17 October 2017**.

The filing of documents referenced in this letter is to be done using the secured service "[My CRTC Account \(Partner Log In or GCKey\)](#)", serving a copy on all parties copied with this letter.

If you have any questions with regards to this matter, please contact Bradley Gaudet at [bradley.gaudet@crtc.gc.ca](mailto:bradley.gaudet@crtc.gc.ca).

Yours sincerely,



Nanao Kachi  
Director, Social and Consumer Policy  
Consumer Affairs and Strategic Policy

Enclosure

c.c.: Distribution List

### **Distribution List**

- Bell Aliant Regional Communications, LP [dave.hussey@bellaliant.ca](mailto:dave.hussey@bellaliant.ca)
- Bell Canada [bell.regulatory@bell.ca](mailto:bell.regulatory@bell.ca)
- Bragg Communications Inc. (Eastlink) [regulatory.matters@corp.eastlink.ca](mailto:regulatory.matters@corp.eastlink.ca)
- Canadian Association of the Deaf [ffolino@cad.ca](mailto:ffolino@cad.ca)
- Canadian Hearing Society [gmalkowski@chs.ca](mailto:gmalkowski@chs.ca)
- Canadian National Society of the Deaf-Blind [mchugh.mm@gmail.com](mailto:mchugh.mm@gmail.com)

- Canadian National Institute for the Blind [lui.greco@cnib.ca](mailto:lui.greco@cnib.ca)
- Chris Newman [newmancmn@gmail.com](mailto:newmancmn@gmail.com)
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- Conseil provincial du secteur des communications (CPSC) du Syndicat canadien de la fonction publique (SCFP) [nblais@scfp.ca](mailto:nblais@scfp.ca)
- Deaf Wireless Canada Consultative Committee [lisa@deafwireless.ca](mailto:lisa@deafwireless.ca)
- Freedom Mobile Inc. [bjones@windmobile.ca](mailto:bjones@windmobile.ca)
- Maple Communications Group Inc. [regulatory@maplecomm.ca](mailto:regulatory@maplecomm.ca)
- Media Access Canada [anthony@tibbs.ca](mailto:anthony@tibbs.ca)
- MTS Inc. [regulatory@mts.ca](mailto:regulatory@mts.ca)
- Northwestel Inc. [regulatoryaffairs@nwtel.ca](mailto:regulatoryaffairs@nwtel.ca)
- Rogers Communications Inc. [regulatory.aff@fidomobile.ca](mailto:regulatory.aff@fidomobile.ca);  
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- Saskatchewan Telecommunications [document.control@sasktel.com](mailto:document.control@sasktel.com)
- Shaw Telecom Inc. [regulatory@sjrb.ca](mailto:regulatory@sjrb.ca)
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- Vidéotron [regaffairs@quebecor.com](mailto:regaffairs@quebecor.com)

## **Appendix**

In order to assist the Commission in establishing a more comprehensive record in the Review the regulatory framework for Message Relay Service (MRS),<sup>1</sup> further information is required on specific matters. TSPs are to provide responses to the questions posed under the following five headings.

### **1. Offering real-time text (RTT) relay on mobile devices**

TELUS submitted on the record that:

- RTT will be made available on wireless handsets in the next few years and that technology could serve to replace Teletypewriter (TTY) and Internet Protocol (IP) Relay;<sup>2</sup>
- developing an IP Relay mobile application would be misguided, and that it would be far more efficient to save investment dollars for RTT;<sup>3</sup>
- an IP Relay application is unnecessary and inefficient regulation, given the near term release of RTT;<sup>4</sup>
- it expects to “roll out RTT on MRS” in Canada in 2018;<sup>5</sup> and
- as soon as RTT technology is ready to be deployed in Canada, TELUS will be making it available to its customers as a native application on wireless devices and any other media which are to be supported by device manufacturers.<sup>6</sup>

#### **Questions for all TSPs on the distribution list:**

- a) When do you anticipate your network being able to support RTT and wireless devices with either (1) integrated RTT or (2) a capability of downloading a RTT application becoming available for your wireless subscribers so that they can use RTT? Describe any technical barriers to implementing this service.
- b) Outline your plans for the roll out of a RTT relay service, including timeframes, technical barriers, and plans for engaging with the Deaf, DeafBlind, hard of hearing and speech-impaired community during the development, testing, and implementation.
  - (i) Would RTT relay service be limited to wireless subscribers?
  - (ii) Would the service use 10-digit telephone numbers that conform to the North American Numbering Plan (NANP)?
  - (iii) Describe any technical barriers to implementing the service.
  - (iv) When would a RTT relay app be available to customers?

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<sup>1</sup> Telecom Notice of Consultation 2017-33

<sup>2</sup> See paragraph 21 of TELUS's intervention.

<sup>3</sup> See paragraph 12 of TELUS's final submission.

<sup>4</sup> See paragraph 33 of TELUS's final submission.

<sup>5</sup> See paragraph 11 of TELUS's final submission.

<sup>6</sup> See paragraph 18 of TELUS's final submission.

- c) If you are a wholesale provider of MRS that plans to roll out a RTT relay service, what are your plans for making the service available to your wholesale customers, including timeframes?

## **2. Improving accessibility of IP relay on mobile devices**

The CRTC 2009 accessibility policy<sup>7</sup> contemplated that IP Relay Service would be used from mobile devices.

Although the accessibility policy contemplated that IP relay service would be used on mobile devices, Bell stated on the record<sup>8</sup> that:

- the web-based IP relay access portal was not built with wireless devices in mind, as it does not operate effectively on reduced screen sizes;
- in order to receive an incoming call, the mobile device has to be active (screen turned on), the end-user must be looking at the screen, and the pop-up window must be visible; and
- on a wireless device, the user will be logged out when the device screen locks, which may be after only a few minutes.

DWCC has raised concerns on the record surrounding the accessibility of IP relay on mobile devices,<sup>9</sup> as follows:

- 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;
- there is great difficulty in having the return key work on the internet browser;
- there is no alert/notification system in place when IP relay consumers are away from their mobile device; and
- the biggest issue for those with visual needs is customization with adjustment of background, colours, and font types and colours.

Furthermore, Maple Communications stated that IP relay's interface on mobile devices is frustrating to use as it requires a lot of zooming and panning to interact with the IP Relay service.

DWCC therefore recommends development of an IP-Relay app that meets all Web Content Accessibility Guidelines (WCAG) 2.0 standards.<sup>10</sup>

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<sup>7</sup> See paragraph 16 of [Broadcasting and Telecom Regulatory Policy CRTC 2009-430](#).

<sup>8</sup> See response A14 on page 15 of Bell's intervention.

<sup>9</sup> See paragraphs 10, 20, 21 and 22 of DWCC's final submission.

<sup>10</sup> See page 9 of DWCC's intervention.

TELUS submitted on the record that:

- a mobile app is not being planned for at this time, but a mobile version of the IP Relay webpage would eliminate the need for a specific mobile app;<sup>11</sup> and
- it is now exploring the feasibility of creating a mobile version of the IP Relay webpage which would improve the accessibility of IP Relay on mobile devices.<sup>12</sup>

In Shaw's [\*Report of Accessibility Initiatives\*](#) filed on 10 July 2017 further to paragraph 223 of Telecom Regulatory Policy 2016-496, Shaw indicated that it has held accessibility focus group sessions, during which participants provided Shaw with detailed and constructive feedback on Shaw's IP Relay service offering.

Furthermore, Shaw has submitted on the record of the MRS proceeding that:

- it is currently working with its wholesale provider to develop an IP relay App for its customers; and
- in the meantime, it is undertaking changes to its IP Relay interface to meet the needs of customers on-the-go by making the interface more mobile friendly.

Questions for Shaw:

- a) What are the timeframes and associated costs to develop and implement the IP Relay App? Provide supporting rationale.
- b) What changes are you making to the IP Relay web interface to meet the needs of customers on-the-go and which concerns raised by DWCC and Maple Communications during this proceeding (as described above) would be addressed by these changes?
- c) Will your IP Relay App automatically send customers a notification (e.g. via email or text) when a caller has left a message? If not, what would be the timeframe and associated costs for modifications to your App to enable it to do so?

Questions for TELUS:

- d) What are the timeframe and associated costs to develop and implement a WCAG-compliant mobile version of the IP relay webpage? How would the costs and timeframe compare to those associated with developing and implementing an IP Relay App? Provide supporting rationale.
- e) Which concerns raised by DWCC and Maple Communications during this proceeding would be addressed by a mobile version of the IP relay webpage?
- f) During the development and implementation of a mobile version of the IP relay webpage, outline your plans for engaging with the Deaf, DeafBlind, hard of hearing and speech-impaired community.
- g) Would the mobile version of the IP Relay webpage send customers a notification (e.g. via email or text) when a caller has left a message? If not, what would be the timeframe and associated costs for modifications to your webpage to enable it to do so?

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<sup>11</sup> See paragraph 19 of TELUS's reply comments.

<sup>12</sup> See paragraph 18 of TELUS's reply comments.

Questions for all TSPs on the distribution list other than TELUS and Shaw:

- h) As your company has indicated that it provides MRS services through a 3<sup>rd</sup> party provider, what are your plans to improve the usability and accessibility of IP Relay service on mobile devices or to work with your wholesale provider to achieve this objective? Would you be able to work with your wholesale provider to implement an IP Relay App or undertake changes to your IP Relay interface?

**3. Accessibility of IP relay on home computers**

Given that there are no plans for RTT on wireline devices in the near future, IP relay access on home computers will continue to be important for Deaf, Deafblind, hard of hearing and speech-impaired people.

In Shaw's [Report of Accessibility Initiatives](#),<sup>13</sup> Shaw indicated that:

- it has reached out to focus group participants who indicated a willingness to assist Shaw in developing and testing changes to Shaw's IP Relay interface prior to market launch;
- enhancements to the interface will be completed in approximately 3 to 4 months and include the ability to customize the font and colour of the interface; and
- once the enhancements are ready, Shaw is committed to engaging with individuals to gain further feedback.

Questions for all TSPs on the distribution list:

- a) Does your company's current IP relay webpage/portal meet the World Wide Web Consortium (W3C) WCAG level A and AA standards? If not, what are your plans to either meet these standards or work with your wholesale provider to meet these standards?

Questions for all TSPs on the distribution list other than Shaw:

- b) What are your plans to improve the usability and accessibility of IP Relay service on home computers or to work with your wholesale provider to achieve this objective? Describe timeframes, associated costs, and how you or your wholesale provider would engage with the Deaf, DeafBlind, hard of hearing and speech-impaired community.

**4. Quality of service standards for MRS**

Various parties have stated on the record of the MRS proceeding that they would support quality of service standards for MRS. For example, Bell stated that it would

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<sup>13</sup> Shaw filed the report on the record of the Commission's *Review of basic telecommunications services* (File number: 8663-C12-201503186).

support the Commission adopting quality of service standards to apply consistently across the country to ensure a uniform level of service is received by all Canadians, regardless of where they live.<sup>14</sup>

Questions for all TSPs on the distribution list:

a) Potential standard regarding typing speeds

- (i) In [Telecom Decision CRTC 94-9](#), the Commission established a goal of a minimum typing speed of 60 words per minute (WPM) for MRS. Based on the information on the record, this target is not being met on average. As such, in the event the Commission were to mandate a quality of service standard for MRS (i.e. both TTY relay and IP Relay) that minimum typing speeds must be 60 words per minute with 95% transcription accuracy, comment on the:
  - a) timeframe that your company would require to come into compliance; and
  - b) associated costs to come into and maintain compliance.
- (ii) DWCC has stated on the record that it is important that operators have a high proficiency to type fast, 80-90 WPM.<sup>15</sup> As such, provide an estimated timeframe and cost if the mandated quality of service standard for MRS were set at 80 words per minute with 95% transcription accuracy.
- (iii) Alternatively, if you do not offer MRS directly but rather contract MRS services through a wholesale provider, comment on the steps you would take with your provider, and associated costs, to meet the above-noted typing speeds and transcription accuracy.

b) Potential standard regarding call-answer times

DWCC has stated on the record that the most common concern and experience shared by respondents to the DWCC survey was long waits, lack of waiting prompts for queues, hold times and hang ups. The length of wait time examples shared by respondents included wait times of up to 35 minutes.<sup>16</sup>

Bell stated on the record that in its relay centres, it has historically targeted a call answer standard of 80% of calls within 20 seconds.<sup>17</sup> Similarly, TELUS stated on

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<sup>14</sup> See paragraph 11 of Bell's final submission.

<sup>15</sup> See page 11 of DWCC's intervention.

<sup>16</sup> See page 25 of the DWCC survey analysis report.

<sup>17</sup> See page 11 of Bell's intervention.



the record that it imposes a best efforts quality of service metric of answering 80% of all MRS calls received within 20 seconds.<sup>18</sup>

- (i) In the event the Commission were to mandate a quality of service standard that 80% of calls must be answered within 20 seconds, comment on:
  - a) the timeframe that your company would require to come into compliance; and
  - b) the associated costs to come into compliance and to maintain compliance.
  
- (ii) Provide an estimated timeframe and cost if the mandated quality of service standard were set as follows:
  - a) 85% of calls must be answered within 15 seconds, as indicated on the record by Bell<sup>19</sup> as the “answer standard” adopted by the Federal Communications Commission (FCC) in the United States;
  - b) 85% of calls must be answered within 10 seconds, which, according to the FCC website, is presently the standard employed by the FCC;<sup>20</sup> and
  - c) 90% of calls must be answered within 10 seconds.
  
- (iii) Alternatively, if you do not offer MRS directly but rather contract MRS services through a wholesale provider, comment on the steps you would take with your provider, and associated costs, to meet the above-noted call-answer times.

## **5. Revenues collected to provide MRS in 2016**

On 3 February 2017, the Commission issued a [letter to local exchange carriers \(LECs\)](#) that requested the total revenue collected for each year from 2013 to 2015 to provide MRS.

### **Questions for all LECs on the distribution list:**

- a) With respect to the amount (\$) that your company collects to provide MRS, provide the total revenue collected for the year 2016 to provide MRS. Provide a breakdown of this MRS revenue by the following segments: i) wireline customers; ii) mobile/wireless customers; iii) VoIP customers; iv) wholesale MRS revenues; and v) other revenue.
- b) With respect to the amount your company spends on providing MRS (either directly or through a third party), provide the total annual expenditure (**where**

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<sup>18</sup> See paragraph 10 of TELUS’s intervention.

<sup>19</sup> See page 11 of Bell’s intervention.

<sup>20</sup> <https://www.fcc.gov/consumers/guides/telecommunications-relay-service-trs>

**available**) for each of the years from 2013 to 2014 broken down between TTY and IP relay, providing separately the capital costs, direct operating expenses and third party costs under each service.