



DEAF
WIRELESS
CANADA
COMMITTEE

COMITÉ POUR LES
SERVICES
SANS FIL DES
SOURDS DU
CANADA

Canadian
Association of the Deaf



Association
des Sourds du Canada

CNSDB
The Canadian National Society of the Deaf-Blind, Inc



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August 30, 2018

Mr. Claude Doucet
Secretary-General
Canadian Radio-telecommunications Commission (CRTC)
Ottawa, ON K1A 0N2

Re: Report regarding the retail sales practices of Canada's large telecommunications carriers: Telecom Notice of Consultation [CRTC TNC 2018-246](#) - *Inquiry and Statement regarding Public Survey*

The Deaf Wireless Canada Consultative Committee-Comité pour les Services Sans fil des Sourds du Canada (**DWCC-CSSSC**), Canadian Association of the Deaf-Association des Sourds du Canada (**CAD-ASC**), Canadian National Society of the Deaf-Blind (**CNSDB**), and the Deafness Access Advocacy Nova Scotia (**DAANS**), henceforth collectively referred to as "**DWCC et al**" intends to participate in the [CRTC TNC 2018-246](#) proceeding dealing with large service providers' retail sales practices.

This is DWCC et al's first procedural request related to this particular proceeding.

PURPOSE

1. Once again the *DWCC et al* observes that there is no opportunity for ASL and LSQ videos for Deaf, Deaf-Blind, and Hard of Hearing (DDBHH) Canadians with different backgrounds to participate in CRTC's Phase 2 public surveys. These surveys are available only in [English](#) and [French](#).
2. The surveys must be made accessible to Canadian ASL / LSQ users allowing them opportunities to provide CRTC with their comments and responses in their native language - that being ASL or LSQ. Making the survey accessible is easily achieved by adding ASL / LSQ videos for each and every survey question and by allowing responses to each and every survey question to be provided in ASL or LSQ as appropriate. This way, ASL / LSQ users may participate in the CRTC survey on an equal footing with their English / French using counterparts.
3. The CRTC survey has "Deaf related" questions. The question asking about language use at home correctly identifies ASL as American Sign Language but misidentifies LSQ as "Quebec Sign Language." The correct wording is **langue des signes québécoise (LSQ)**. Appendix A has screenshot images of the questions mentioned in this document.
4. This public survey is time limited - it goes from August 27 to September 7, 2018 (midnight PDT).
5. *DWCC et al* interprets the August 30 deadline for first interventions to mean CRTC has no plans to make its public surveys inclusive and accessible to DDBHH Canadians who use ASL and LSQ.

6. *DWCC et al* is concerned about the lack of information in ASL and LSQ videos, which are not available for DDBHH Canadians who cannot access and respond to the survey made by the CRTC. In fact, CRTC has created an accessibility barrier for DDBHH Canadians in a public government document without these ASL and LSQ videos. *DWCC et al* requests that the CRTC must include ASL and LSQ videos for CRTC Phase 2 surveys as part of its public proceedings, to meet a certain extent of the standards of accessibility for DDBHH Canadians. This must be done as a fundamental objective to achieve an Accessible Canada.
7. *DWCC et al* heard quite a number of stories from ASL and LSQ users about misleading, aggressive, or insufficient information provided in sales practises and our joint party wishes to collect these stories and corroborating evidence from these individuals to fully participate in the proceeding.
8. The summer months proved to be difficult for *DWCC et al* to gather first-hand stories and responses to all relevant questions for the proceeding for the first intervention submission.

REQUEST

9. *DWCC et al* hereby requests to undertake a survey in four languages to make it fully accessible in plain English, ASL, plain French and LSQ and in Deaf-Blind friendly accessible formats to allow for Canadian DDBHH to fully participate and share their experiences.

CHALLENGE

10. Members of *DWCC et al* took CRTC's survey and found it to be quite long, verbose peppered with many "big words." The survey is not plain-language friendly for DDBHH Canadians. It requests permission for our survey to be made in a simplified and relevant format for DDBHH Canadians participation to ensure that their "voices" are heard.

QUESTION

11. Does *DWCC et al* have to duplicate the CRTC's survey exactly as is - question by question, or could it create its own four-language plain-language survey allowing full participation of DDBHH Canadians?

FIRST DRAFT SURVEY QUESTIONS

12. Appendix B contains the first draft of *DWCC et al*'s survey questions for the survey relevant to telecommunications service provider sales practices in of this document. Please let us know if these are acceptable questions that parallel with CRTC's own survey.

CONCLUSION

13. Please be advised that *DWCC et al* will submit a separate second procedural request containing proposed deadlines for the proposed survey mentioned in this particular procedural request. The deadlines mentioned in the subsequent request will be between August 30, 2018 and October 22, 2018 (the date of the proceedings first hearing).

14. We appreciate the Commission's consideration of our request, and we look forward to its response to our questions at the earliest possible date.

Should you have any questions, please do not hesitate to contact Lisa Anderson-Kellett and Frank Folino as the primary contacts.

Sincerely yours,

Lisa Anderson-Kellett, Chair
Deaf Wireless Canada
Consultative Committee
lisa@deafwireless.ca

Frank Folino, President
Canadian Association of the Deaf-
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Megan McHugh, President
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Elliott Richman
Director of Deaf Outreach
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cc: Nanao Kachi, Director, Social and Consumer Policy, CRTC
James Roots, Executive Director, CAD-ASC
Leonor Vlug, Secretary, CAD-ASC
Michael J. Stewart, Secretary, DWCC-CSSSC

Consumer Groups:

Gary Malkowski, Canadian Hearing Society (CHS)
Tamir Israel, Canadian Internet Policy and Public Interest Clinic (CIPPIC)
Canadian National Institute of Blind (CNIB)
Monica L. Auer, Forum for Research and Policy in Communications (FRPC)
Devin Currie, Maple Communications
Anthony Tibbs, Media Access Canada (MAC)
Professor Marina Pavlovic, University of Ottawa
Professor Mary Cavanagh, University of Ottawa
John Lawford, Public Interest Advocacy Centre (PIAC)

Telecommunications Companies:

Bell Canada
Bragg Communications Incorporated, carrying on business as Eastlink (Eastlink)
Cogeco Connexion Inc. (Cogeco)
Northwestel Inc. (Northwestel)
Rogers Communications Canada Inc. (RCCI)
Saskatchewan Telecommunications (SaskTel)
Shaw Communications Inc. (Shaw)
TBayTel
TekSavvy Solutions Inc. (TekSavvy)
TELUS Communications Inc. (TCI)
Videotron Ltd. (Videotron) and
Xplornet Communications Inc. (Xplornet)

ABOUT US

Members of DWCC et al introduce themselves as follows:

1. **DWCC-CSSSC** is a standing committee of the CAD-ASC and is a group of Deaf, Deaf-Blind, and Hard of Hearing consultants, analysts and committee volunteers across Canada. DWCC's mandate is to advocate for equality for Deaf, DeafBlind and Hard of Hearing Canadians in wireless telecommunications as in:

- Fair, uniform, cost reasonable wireless data plans for ASL and LSQ users
- Transparent and clear advertisement of plans offered
- Decreased disparity of wireless product and service provisions within the companies
- Promotion and availability of wireless software applications (apps) that ensure functional equivalency
- Accessible wireless emergency service provisions in Canada

2. **CAD-ASC** is a national information, research and community action organization of Deaf people in Canada. Founded in 1940, CAD-ASC provides consultation and information on Deaf issues to the public, business, media, educators, governments and others; conduct research and collects data. CAD-ASC promotes and protects the rights, needs, and concerns of Deaf people who use American Sign Language (ASL) and langue des signes québécoise (LSQ). CAD-ASC is affiliated with the World Federation of the Deaf (WFD), and CAD-ASC is a United Nations-accredited Non-Governmental Organization (NGO) to the Convention on the Rights of Persons with Disabilities.

3. **CNSDB** was registered in 1985 as a national consumer-run advocacy association dedicated to helping Canadians who are deaf-blind achieve a higher quality of life. We advocate for new and improved services, promote public awareness of deaf-blind issues and gather and distribute information in order to help empower individuals who are deaf-blind to become full participants of society. CNSDB provides expertise in accessibility related to the needs of individuals who are living with the distinct disability of deaf-blindness, which is different from deafness or blindness due to being unable to use one sense in order to compensate for the loss of the other.

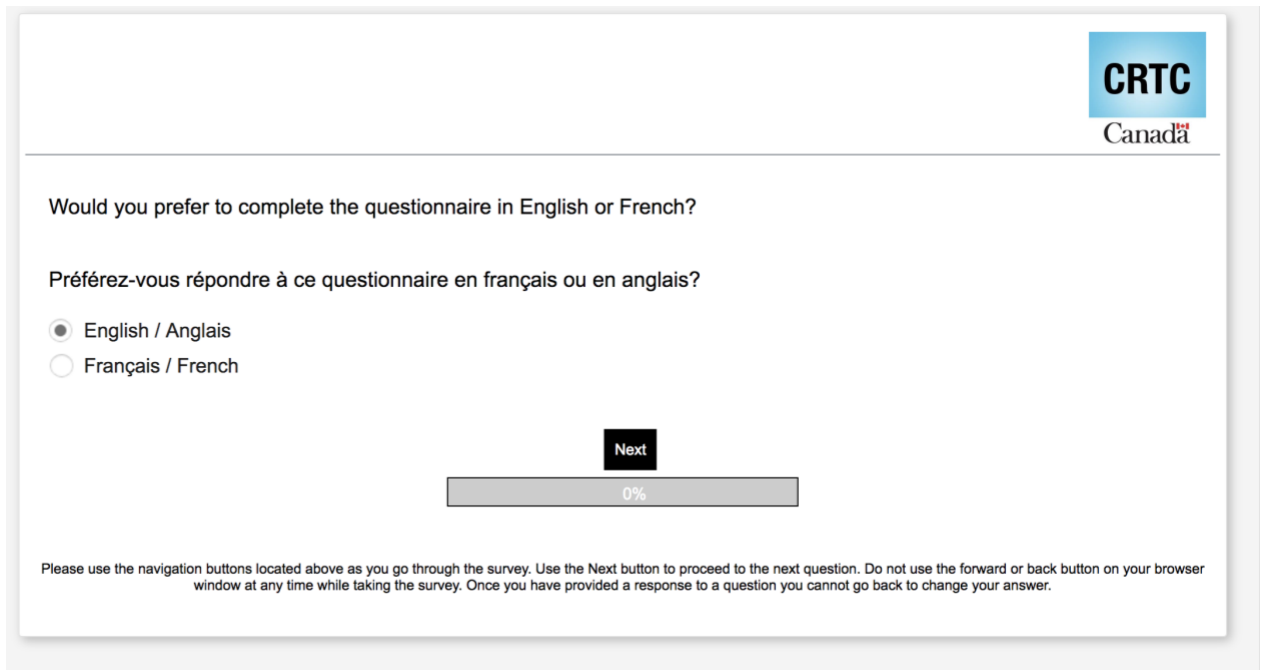
4. **DAANS** was founded in 1976 and incorporated in 1978. DAANS works with the public, private and non-profit sectors to remove old barriers and prevent new barriers faced by an estimated 58,000 Deaf, hard of hearing, late deafened and Deaf-blind Nova Scotians in a variety of areas including communication access, education, employment, health, legal services and recreation.

APPENDIX A

Screenshots from
CRTC's Telecom
Sales Practises Survey

[Link to English Survey](#)

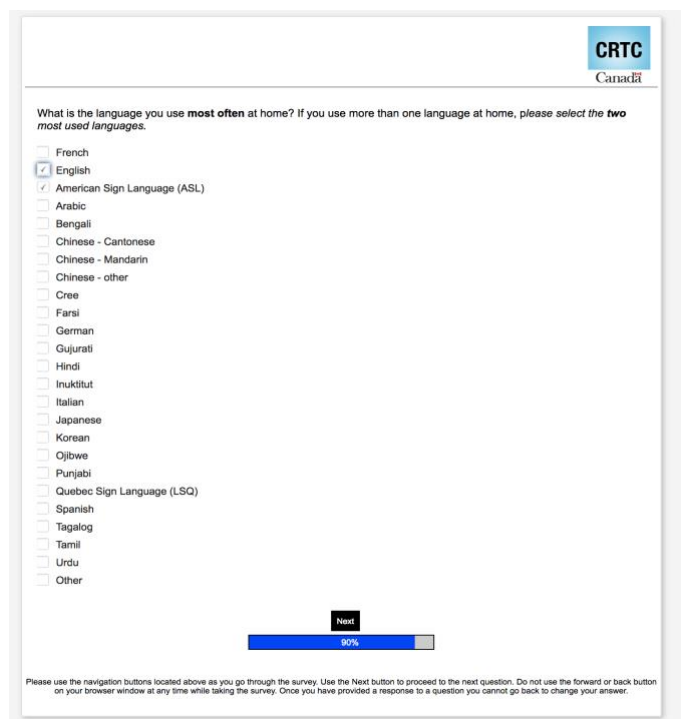
1. Only in English or French



The screenshot shows a survey question in both English and French. The English text asks, "Would you prefer to complete the questionnaire in English or French?" and the French text asks, "Préférez-vous répondre à ce questionnaire en français ou en anglais?". There are two radio button options: "English / Anglais" (which is selected) and "Français / French". Below the options is a "Next" button and a progress bar showing 0%. At the bottom, there is a note: "Please use the navigation buttons located above as you go through the survey. Use the Next button to proceed to the next question. Do not use the forward or back button on your browser window at any time while taking the survey. Once you have provided a response to a question you cannot go back to change your answer."

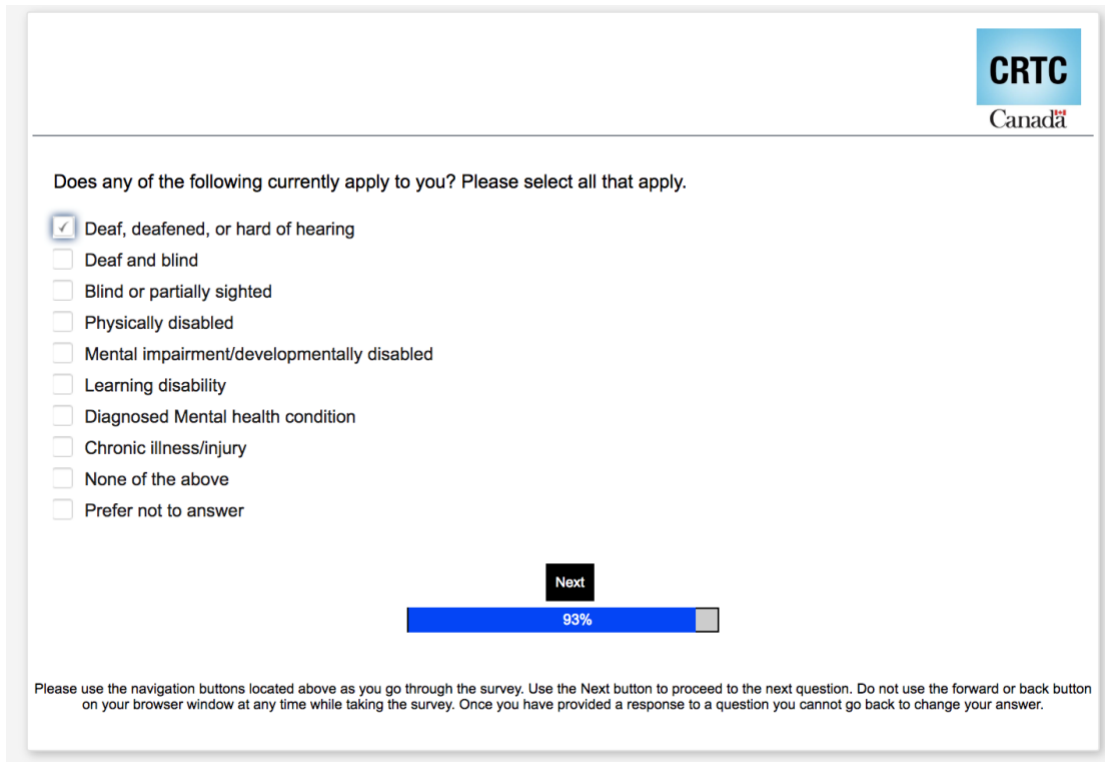
2. Language used most often at home?

English, French, ASL and Incorrectly spelled out LSQ as Quebec Sign Language, which by the way, should be properly typed out as: **langue des signes québécoise** and yet did not include questions in ASL or LSQ.



The screenshot shows a survey question: "What is the language you use most often at home? If you use more than one language at home, please select the two most used languages." Below the question is a list of languages with checkboxes. The selected options are "English" and "American Sign Language (ASL)". Other options include French, Arabic, Bengali, Chinese (Cantonese, Mandarin, other), Cree, Farsi, German, Gujarati, Hindi, Inuktitut, Italian, Japanese, Korean, Ojibwe, Punjabi, Quebec Sign Language (LSQ), Spanish, Tagalog, Tamil, Urdu, and Other. At the bottom, there is a "Next" button and a progress bar showing 90%. At the very bottom, there is a note: "Please use the navigation buttons located above as you go through the survey. Use the Next button to proceed to the next question. Do not use the forward or back button on your browser window at any time while taking the survey. Once you have provided a response to a question you cannot go back to change your answer."

3. Self-identification question included options: Deaf, deafened, or hard of hearing and Deaf and blind question but did not include the translation of such questions in ASL or LSQ (the survey should have been available in both sign languages).



The screenshot shows a survey interface for CRTC Canada. The question asks: "Does any of the following currently apply to you? Please select all that apply." The options are: "Deaf, deafened, or hard of hearing" (checked), "Deaf and blind", "Blind or partially sighted", "Physically disabled", "Mental impairment/developmentally disabled", "Learning disability", "Diagnosed Mental health condition", "Chronic illness/injury", "None of the above", and "Prefer not to answer". A "Next" button is visible, and a progress bar shows 93% completion. At the bottom, there is a navigation instruction: "Please use the navigation buttons located above as you go through the survey. Use the Next button to proceed to the next question. Do not use the forward or back button on your browser window at any time while taking the survey. Once you have provided a response to a question you cannot go back to change your answer."

CRTC
Canada

Does any of the following currently apply to you? Please select all that apply.

- Deaf, deafened, or hard of hearing
- Deaf and blind
- Blind or partially sighted
- Physically disabled
- Mental impairment/developmentally disabled
- Learning disability
- Diagnosed Mental health condition
- Chronic illness/injury
- None of the above
- Prefer not to answer

Next

93%

Please use the navigation buttons located above as you go through the survey. Use the Next button to proceed to the next question. Do not use the forward or back button on your browser window at any time while taking the survey. Once you have provided a response to a question you cannot go back to change your answer.

APPENDIX B

First Draft
DWCC et al's
Sales Practises Survey

SURVEY QUESTIONS

1. What is your gender? (choose only one)

- a. Female
- b. Male
- c. Non-binary
- d. I prefer not to answer
- e. Other: (please write on the line)_____

2. How old are you? (choose only one)

- a. 18 to 24 years
- b. 25 to 34 years
- c. 35 to 44 years
- d. 45 to 54 years
- e. 55 to 64 years
- f. 65 yrs or older
- g. I prefer not to provide information

3. Which Canadian province or territory do you live in? (choose only one)

- a. British Columbia
- b. Yukon
- c. Alberta
- d. Northwest Territories
- e. Saskatchewan
- f. Nunavut
- g. Manitoba
- h. Ontario
- i. Québec
- j. Newfoundland and Labrador
- k. Nova Scotia
- l. Prince Edward Island
- m. New Brunswick

4. Which telecommunication service providers do you currently use? (choose up to two)

- a. Rogers Communications (includes Fido)
- b. Telus Communications (includes Koodo and Public Mobile)
- c. Bell Canada (includes Virgin Mobile and BellMTS)
- d. Shaw Communications (includes Freedom Mobile)
- e. Videotron
- f. Xplornet Communications
- g. Cogeco
- h. Eastlink
- I. Northwestel
- m. Sasktel
- n. TbayTel
- o. TekSavvy

5. Do you have cellular wireless data plan? (if yes, go to Q5-Q7, if no goes to Q10)

- a. Yes
- b. No

6. How much wireless data is included in your monthly plan? (choose only one)

- a. 0 to 500 MB
- b. 1GB
- c. 2GB
- d. 3GB
- e. 4GB to 6GB
- f. 7GB to 9GB
- g. 10GB to 12GB
- h. 13GB to 15GB
- l. 16GB to 20GB
- j. 20GB or more ("unlimited")

7. How much are you paying for your total monthly fees for wireless services (including any data add-ons and taxes)? (choose only one)

- a. \$0.00 - \$55.99
- b. \$56.00 - \$95.99
- c. \$96.00 - \$135.99
- d. \$136.00 - \$175.99
- e. \$176.00 - \$216.99
- f. \$217.00 or more

8. Do you have an accessibility plan? (choose only one)

- a. Yes (skip to Q9)
- b. No (skp to Q10)
- c. I don't know / Unsure

9. If yes, please describe the accessibility plan (select all that apply):

- a. \$15.00 discount
- b. \$20.00 discount
- c. 2 GB free
- d. Grandfathered plan
- e. Other: (please write on the line_____)

10. Did you have an experience that you were not happy with your telecommunication service provider?

- c. Yes
- d. No
- e. I am not sure

11. How did you communicate with your telecommunications service provider?

- a. Live Chat Online through service provider's website
- b. Social media messaging (Facebook Messenger, Twitter inbox)
- c. By Phone (using TTY, IP Relay or SRV Canada VRS)
- d. In-store (walk-in)
- e. Email

12. Did you experience being prevented from receiving sales information due to the following customer categories (MUST PICK ONE or TWO):

(answers will skip to Q13, Q16, Q19)

- a. Older Canadian (age 55 and older)
- b. Deaf or DeafBlind or Hard of Hearing, or another disability
- c. Language Barriers (no ASL or LSQ and difficulty to understand the English or French written information/literacy challenges)

Deaf, Deaf-Blind, Hard of Hearing or another disability

13. If you are Deaf, Deaf-Blind, Hard of hearing, or have another disability, did you find that the telecommunications service providers made an effort to ensure and accommodated your needs to ensure that you are able to to make an informed decision about the service sold or offer to you for sale?

- a. Yes (go to Q14)
- b. No (go to Q15)
- c. I am not sure

14. If yes, the telecommunications service providers accommodated your needs to to make an informed decision about these services, please explain or describe.

Text response:

15. If not, what else do you think could have been done to help you to make an informed decision in respect of the sales interaction? Please explain or describe:

Text response:

Older Canadian (age 55 and older)

16. If you are an older Canadian, for example, you are over 55 years of age, did you find that the telecommunications service providers made an effort to ensure and accommodated your needs to ensure that you are able to to make an informed decision about the service sold or offer to you for sale?

- a. Yes (go to Q17)
- b. No (go to Q18)
- c. I am not sure

17. If yes, the telecommunications service providers accommodated your needs to to make an informed decision about these services, please explain or describe.

Text response:

18. If not, what else do you think could have been done to help you to make an informed decision in respect of the sales interaction? Please explain or describe:

Text response:

Language Barriers

19. If you are a Canadian with a language barrier, did you find that the telecommunications service providers made an effort to ensure and accommodated your needs to ensure that you are able to to make an informed decision about the telecommunications services sold or offer to you for sale?

- a. Yes (go to Q20)
- b. No (go to Q21)
- c. I am not sure

20. If yes, the service provider accommodated your needs to to make an informed decision about the telecommunications services, please explain or describe.

Text response:

21. If not, what else do you think could have been done to help you to make an informed decision in respect of the sales interaction? Please explain or describe:

Text response:

IN-STORE EXPERIENCE (jump from Q11)

22. Did you have a sign language interpreter with you in the store?

- a. Yes
- b. No

23. Did you know you can request a sign language interpreter for your in-store customer service?

- a. Yes
- b. No

24. Were the staff willing to communicate with you, were they friendly and accepting?

- a. Yes
- b. No

If no, please describe your experience:

25. When you dealt with your telecommunications service providers in person or online, did the service provider used plain language that was easy to understand?

- a. Yes
- b. No

If no, please describe:

26. Did you have any other communication challenges?

- a. Yes
- b. No

If yes, please describe:

27. Describe your sales experience in text or ASL and LSQ?

- a. Please type here [text box] or
- b. Please insert a video link (either Youtube or vimeo) to allow us to watch your video to decide to select to use toward the proceeding. If possible, can you please include a transcript or e-mail us a transcript at: survey@deafwireless.ca

28. Please provide us with evidence of your experience by uploading evidence documents or sending attachments to an e-mail to survey@deafwireless.ca

Examples of evidence:

- a. Emailed file or copy paste of an IP Relay transcript
- b. Emailed file or copy paste of an Online Live Chat transcript
- c. Emailed copy and paste from Twitter inbox or live twitter conversations
- d. Emailed copy and paste from Facebook Live Support transcript
- e. Photographed or scanned images of your handwritten notes back and forth with the salesperson for in-store communications.
- f. Forwarded a copy of e-mail communications with the sales department

Important: The evidence must include supporting rationale and all the evidence upon which your shared experience is based on:

- the service provider and service (wireless data package plans, internet plans, accessibility plans, etc) that you are sharing your experience about
- Date
- What way the sales interaction occurred (e.g. in person, on the phone, etc.);
- the nature of the sales practice used and why the consumer views it as misleading or aggressive; and

- avenues that the consumer used to address those sales practices and the results of the consumer's attempt to rectify the situation, if any, as well as whether the consumer was aware of any other recourse available to them.

Commission for Complaints for Telecom-Television Services (CCTS)

Background: The CCTS is an independent organization dedicated to working with customers and service providers to resolve complaints about telephone, Internet, and wireless services, as well as certain aspects of television services. Its structure and mandate are approved by the Commission.

29. Are you aware of the CCTS and its services to help customers resolve complaints about service providers?

- a. Yes (skip to Q26)
- b. No (skip to Q28)
- c. I am not sure

30. How did you know about the CCTS?

- a. Telecommunications Service Providers (e.g. Rogers, Bell, Telus, etc.)
- b. CRTC Website
- c. Social Media (Facebook, Twitter, Youtube, etc.)
- d. Friend or Family
- e. Deaf organization (Association, or support service agency)
- f. Deaf Wireless Canada Consultative Committee (DWCC et al)
- g. Canadian Wireless Telecommunications Association (CWTA)
- h. Others: please type out

31. Do you feel that the CCTS should have an expanded role to help the customer resolve complaints about broader communication services, including, for example:

- a. Accessibility discount disputes and denials
- b. Data overages
- c. Lack of accessibility accommodations
- d. Accessible relay services - IP Relay, TTY Relay, SRV Canada VRS
- e. Sales practices

32. Any more concerns, comments, that you have and want to share with us or the Canadian Radio- television and Telecommunications Commission (CRTC), Commission for Complaints for Telecom-Television Services (CCTS), and Canadian Wireless Telecommunications Association (CWTA)?

Text response

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