



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](#) - Procedural Request: Survey for Accessibility Groups

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 Deafness Access Advocacy Nova Scotia (**DAANS**), henceforth collectively referred to as "**DWCC et al**" once again declares its intention to participate in the [CRTC TNC 2018-246](#) proceeding dealing with large service providers' retail sales practices.

This is the second procedural request regarding *DWCC et al's* participation in TNC 2018-246.

In this procedural letter, we include:

- 1) An introduction of our four groups
- 2) A rationale for this letter
- 3) A description of our past experience with survey report submissions
- 4) A comparative timeline of the survey process with the proceeding timelines
- 5) A draft timeline of the survey development process

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.

RATIONALE

5. This is a letter to initiate a procedural request, which DWCC et al hereby asks for more time to ensure a quadrilingual survey in English, French, ASL and LSQ for our accessibility groups who are Deaf, Deaf-Blind and Hard of Hearing (DDBHH) Canadians that represents all age groups especially seniors, to collect their stories about misleading sales practices that are related to accessibility and language barriers. This letter follows our first procedural letter pointing out that CRTC's survey, undertaken in [English](#) and [French](#), is not provided in a language accessible for Deaf, Deaf-Blind and Hard of Hearing Canadians.

6. Therefore, DWCC et al are requesting to submit a survey report for the record of this proceeding, which is based on our past experiences when submitting surveys at the public hearing. This time, it is critical to ensure everyone including CRTC Commissioners and other participants in the proceeding will have sufficient time to review its finding before the joint appearance at the public hearing.

PAST EXPERIENCE

7. From our past experiences in the previous proceedings: CRTC TNC 2015-134, CRTC TNC 2016-116, CRTC TNC 2017-33, CRTC TNC 2018-98 on our quadrilingual surveys actually takes more time to be coordinated and conducted than a normal bilingual survey in English and French.

8. In the past, *DWCC et al* have tended to submit our final survey reports on the day of our appearance of the public hearing, and we are henceforth trying to avoid this, and instead providing a time for others to respond and for the Commissioners to have an opportunity to ask us survey result related questions.

9. Designing a fully accessible and quadrilingual survey involves film equipment, video editing, and verifying the logic of the questions, uploading videos to Survey Monkey and duplicating to a fully accessible survey format for Deaf-Blind participants. Needless to say, a reasonable amount of time must be allocated for survey promotion, for respondents to respond and finally for gathering and collecting responses.

10. It is intended that the number of survey respondents is to be lower in this proceeding and be more of a qualitative nature to meet the requirements of this proceeding. There needs to be a reasonable period of time to allow for *DWCC et al* to get accurate survey responses according to their experiences with disability and/or language barrier with the specific questions during this proceeding.

DWCC et al SURVEY TIMELINE v. CRTC PROCEEDING TIMELINE

11. *DWCC et al* propose the following new deadlines:

October 12 - Complete survey analysis report completed and submitted for the record of the proceeding (10 days before the public hearing).

October 23 - Any party that filed responses to requests for information may file reply comments by this date. [This will allow other parties to question or comment on our survey results.](#)

October 22 - Public hearing start date. Allows *DWCC et al* to present the results from our survey finding and [allows the CRTC to ask us questions related to the survey and parties' experiences.](#)

November 9 - All parties may file final submissions on any matter within the scope of this proceeding by this date. [This will allow for any comments about our survey to be included in these submissions.](#)

DRAFT SURVEY DEVELOPMENT AND PROCESS TIMELINE

12. At this time, *DWCC et al* hereby submit this tentative and draft survey development process timeline. Basically, the timeline is entirely dependent on the availability of the ASL and LSQ film companies to make the ASL and LSQ versions of the survey questions.

August 24 - Survey questions finalized in English, determination of a number of questions that need to be filmed in ASL/LSQ.

August 26 - Send survey for French translations

August 28 - Prepare for ASL versions

August 29 - September 7 (this all depends on the availability of the filming company) - film ASL

September 7-10 - Editing ASL videos

September 10-12 - LSQ videos produced and edited

Sept 12-13 - ASL & LSQ videos uploaded to playlists (Youtube) and embedded into English & French surveys (Survey Monkey)

September 15 - Release survey to public

September 25 - Survey closed (10-day survey period)

September 26 - 28 - Data extraction & compilation

September 28-30 - Data analysis and chart creation and organizing information

September 30 - October 12 - Writing of Analysis Report document with a collation of evidenced materials including transcriptions of ASL or LSQ testimonials.

CONCLUSION

13. *DWCC et al* believe that the submission of its survey report will not affect the proceeding on the original timeline issued by the CRTC, with the benefit of the following:

- a) Parties may review its report ten days before the public hearing (October 12);
- b) It allows the Commissioners to question during the public hearing to *DWCC et al* about our survey report;
- c) Any other parties may submit replies before the October 23rd deadline; and
- d) Parties may include their replies to the final submission on November 9th.

14. We appreciate the Commission's consideration of our request, and we look forward to its response. 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
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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)

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