

**INTERVENTION
#1389**

**CRTC TNC
2018-246
October 22, 2018**

**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



DWCC ET AL: INTRODUCTION

**Megan
McHugh
President
CNSDB**

**Lisa Anderson-
Kellett
Chairperson
DWCC-CSSSC**

**Frank Folino
President
CAD-ASC**

**Elliott Richman
Executive
Director
DAANS**



AGENDA

★ BACKGROUND

★ TELECOM RETAIL
STORE
EXPERIENCES

★ ACCESSIBILITY
PLANS

★ DEAF-BLIND:
ISSUES AND
EXPERIENCES

SURVEY ANALYSIS

ISSUES & CHALLENGES

RECOMMENDATIONS

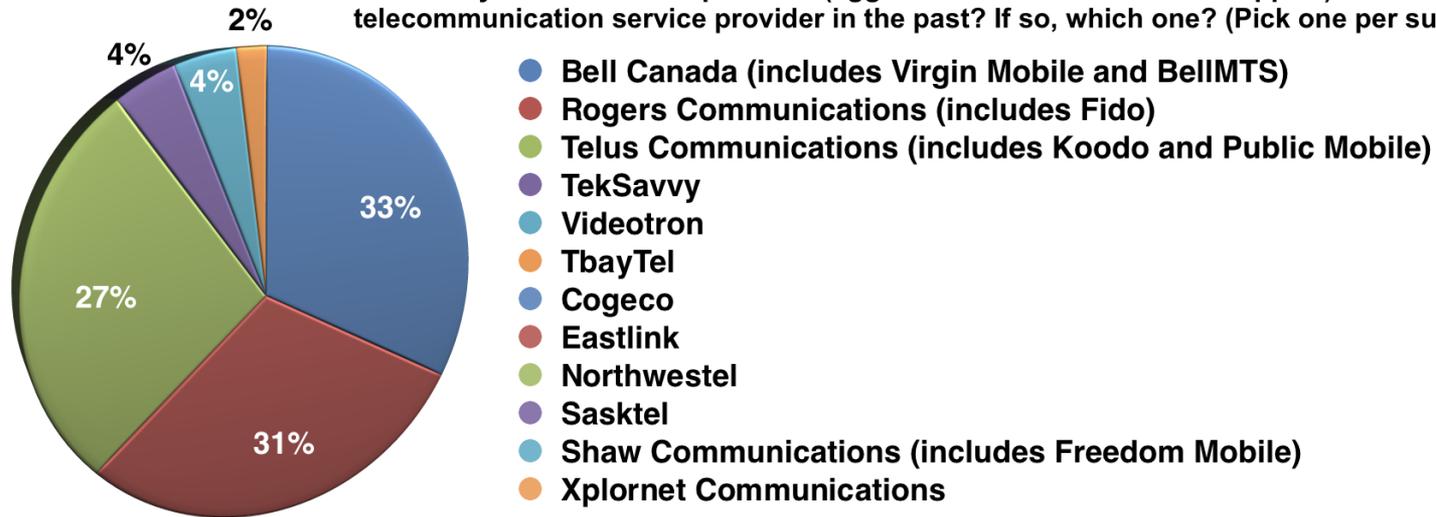
A person wearing a light-colored, ribbed sweater is shown in profile, holding a smartphone. The image is overlaid with a large, semi-transparent blue diamond shape. Inside the diamond, the word "BACKGROUND" is written in white, bold, uppercase letters. The background of the entire image is a blurred indoor setting, possibly a cafe or office, with a table and chairs visible.

BACKGROUND

ISSUES WITH WHICH TELECOMS

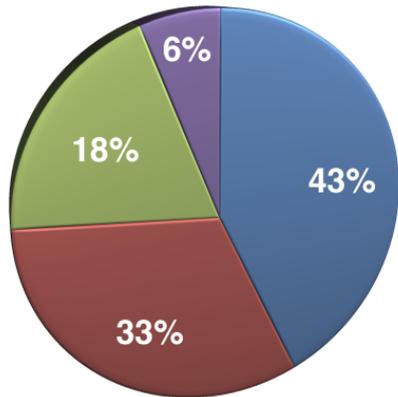
- **33%** reported they had a bad experience with Bell Canada
- **31%** with Rogers
- **27%** with Telus

Q4. Have you had a bad experience (aggressive sales or technical support) with a telecommunication service provider in the past? If so, which one? (Pick one per survey)



MODES OF COMMUNICATION

- **43%** reported they communicated by phone (via relay).
- **33%** reported In-store experiences.
- **18%** used Live Chat online.
- **6%** used email.
- Nobody reported using social media messaging.



Q5. How did you communicate with the telecommunications service provider?

- **By Phone (using TTY, IP Relay or SRV Canada VRS)**
- **In-store (walk-in)**
- **Live Chat Online through the service provider's website**
- **E-mail**
- **Social media messaging (Facebook Messenger, Twitter inbox)**

CHALLENGES: EVIDENCE COLLECTION

CRTC requirement from paragraph 19 CRTC TNC 2018-246

- *“In their interventions, all parties must provide supporting rationale and all evidence on which they rely to formulate their positions.”*

SRV Canada VRS

- SRV Canada VRS does not allow callers to record conversations (either signed or text).
- DDBHH cannot collect and preserve “paper or electronic trail” evidence required by CRTC.

End result

- DWCC et al’s report relied on both anecdotal and empirical evidence due to SRV Canada VRS’s technical limitations

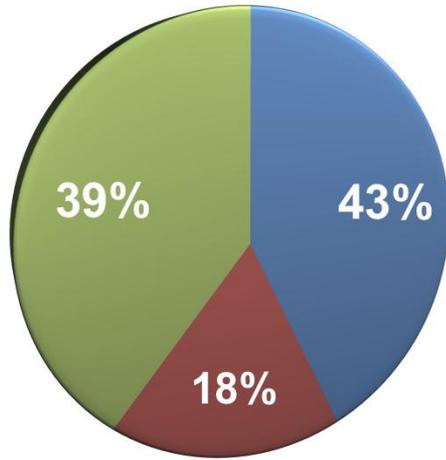
RECOMMENDATIONS

SRV Canada VRS

- Any recommendations regarding how SRV Canada VRS works or should work is **outside the scope** of this proceeding.

ISSUE: AWARENESS OF CCTS

57% were not aware or did not know they could file a complaint with CCTS.



Q46. Are you aware that you have the right to file a complaint about your data plan to your wireless company and Commission for Complaints for Telecom-Television Services (CCTS)?

- A. Yes
- B. No
- C. I did not know

RECOMMENDATIONS



CCTS

- “CCTS needs to create accessible ASL and LSQ videos (in consultation with DWCC et al.) about the complaint processes.”
 - * also mentioned in DWCC et al.’s report to CRTC TNC 2018-98
- CCTS to employ ASL and LSQ fluent DDBHH to handle front-line complaints and inquiries
- CCTS to produce annual reports detailing complaints related to accessibility issues.

A person wearing a light-colored, ribbed sweater is shown from the chest up, looking down at a smartphone held in their hands. The background is a blurred indoor setting, possibly a retail store, with a counter and some equipment visible. A large, solid blue diamond shape is overlaid on the center of the image, containing white text.

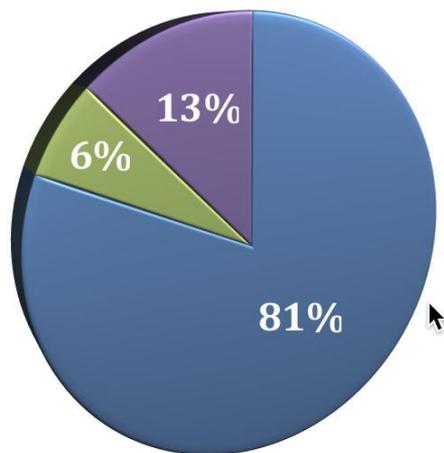
**TELECOM RETAIL STORE
EXPERIENCES**

TELECOM RETAIL STORE EXPERIENCES: *OVERALL ISSUES & CHALLENGES*

- Accessibility Issues: DDBHH customers faces these challenges at in-store (walk-in) experiences when comes to buying decisions on Accessibility packages and service offerings:
 - ★ Accessible Services
 - ★ Staff Awareness and Training
 - ★ ASL & LSQ Videos: Wireless Code and Contract Terminologies at Telecom Retail Stores

TELECOM RETAIL STORE EXPERIENCES: *ACCESSIBLE SERVICES*

- **81%** with store-based salespeople, respondents wrote notes back and forth (with pen and paper)

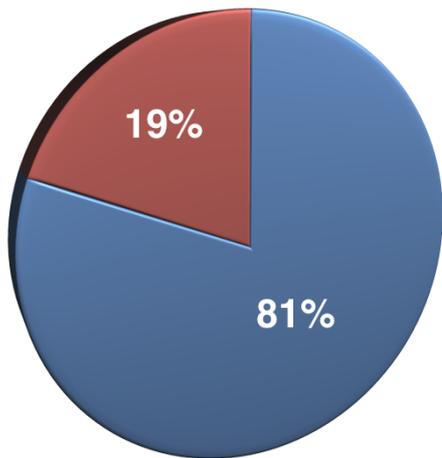


Q6. How did you communicate with the salesperson in the store?

- Pen and paper writing notes back and forth
- Typing on devices back and forth
- Interpreter or intervenor (service support provider - SSP)
- Other (please specify)

TELECOM RETAIL STORE EXPERIENCES: *ACCESSIBLE SERVICES*

- **81%** were not aware they could request a sign language interpreter to personally meet and communicate with a retail staff person.

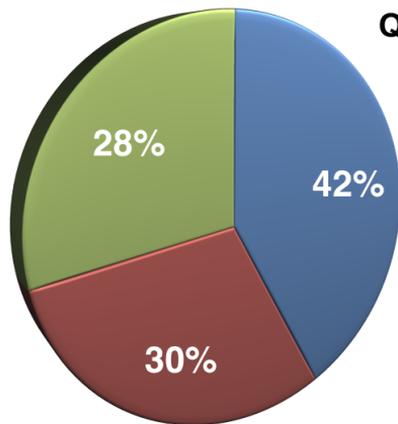


Q7. Did you know you can request a sign language interpreter to meet retail staff in person according to Wireless Code 2.0?

- No
- Yes
- Other (please add to explain)

TELECOM RETAIL STORE EXPERIENCES: *ACCESSIBLE SERVICES*

- **72%** felt that the telecom companies did not make an effort to accommodate DDBHH consumers.



Q13. If you are Deaf, Deaf-Blind, or Hard of Hearing, and have 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 make an informed decision about the service sold or offer to you for sale?

- No
- I am not sure
- Yes

TELECOM RETAIL STORE EXPERIENCES: *STAFF AWARENESS AND TRAINING*

- The provisions of training on accessible customer service for DDBHH customers must be addressed:
 - ★ **Staff Training and Awareness Provisions:** Information about the training on policies, practices, and procedures to telecom retail agents on how to interact and communicate with DDBHH customers related to accessible services such as accessibility plans, sign language interpretation, services offerings and resources.
 - ★ **Training Materials:** Who provides the training provisions? No accessibility groups such as us are being consulted on the training materials.
 - ★ **Training Timelines:** The training to telecom retail sales agents must be received at the beginning of their employment and the training must be held annually with the consultation of accessibility groups on training materials.

TELECOM RETAIL STORE EXPERIENCES: ASL & LSQ VIDEOS- WIRELESS CODE & CONTRACT TERMINOLOGIES

- DDBHH customers who walk into the telecom retail stores where the full information is not being provided. This will not safeguard their rights and responsibilities as DDBHH customers in the Wireless Code:
 - ★ **ASL & LSQ Videos - Wireless Code:** The telecom retail stores must establish ASL & LSQ videos of the Wireless Code at the front desk with a table. Next to the tablet the Wireless Code information in English and French available in an equivalent message like other Canadians who are seen the print copy of the Wireless Code.
 - ★ **ASL & LSQ Video - Contract Terminologies:** DDBHH customers are being showed paper contracts without having seen the wireless terminology videos. If DDBHH customers do not fully understand what they are signing the contract without seeing the ASL and LSQ wireless terminology videos, which could translate to misleading sale practices.

TELECOM RETAIL STORE EXPERIENCES: *RECOMMENDATIONS*

Accessible Services

- ★ Establish and designate ***Accessible Centre of Excellence*** at telecom retail flagship stores in high traffic locations (metropolitan cities) across Canada. Promote ASL & LSQ videos about the store hours where full accessibility is provided.
- ★ ***Employ DDBHH people with ASL and LSQ fluency.*** This will avoid any misleading sale practices to ensure the communication accessibility for DDBHH customers to receive appropriate telecom services.
- ★ ***ASL and LSQ interpretation services and Video Remote Interpreting on devices to be provided to DDBHH customers*** at telecom retail stores across Canada. Promote nationwide ASL and LSQ Interpreting Agencies List on telecom company website, and the list must be consulted with our accessibility groups.

TELECOM RETAIL STORE EXPERIENCES: *RECOMMENDATIONS*

Staff Awareness and Training

- ★ ***Mandatory staff training on customer accessible services*** such as policies, practices, and procedures including orientation of its own website where the accessible information is and where to find the accessible videos, accessibility plans, and sign language interpreting services to be arranged.
- ★ ***Training Materials and Provisions*** must be consulted with our accessibility groups and be provided before the beginning of employment and annually during the employment.

TELECOM RETAIL STORE EXPERIENCES: *RECOMMENDATIONS*

ASL & LSQ Videos: Wireless Code and Contract Terminologies at Telecom Retail Store

- ★ ***Provide in-store tablets such as iPads*** at telecom retail stores (at front desk) that play ASL and LSQ videos of the following content:
 - a) ***Wireless Code - What Are Your Rights and Responsibilities*** along with the print copy of English and French. This will establish as a “tent card” in equal footing with English and French tent cards.
 - b) ***Wireless Contract Terminologies Videos*** must be available to DDBHH customers to watch the video about the contract when comes to buying decisions on Accessibility packages and service offerings.

A person wearing a light-colored, ribbed sweater is shown in profile, looking down at a smartphone held in their hands. The background is a blurred indoor setting, possibly a cafe or office, with a table and chairs visible. A large, solid blue diamond shape is overlaid on the center of the image, containing the text "ACCESSIBILITY PLANS" in white, bold, uppercase letters.

ACCESSIBILITY PLANS

TNC 2016-496 - CRTC directs WSP provisions of Accessibility Plans

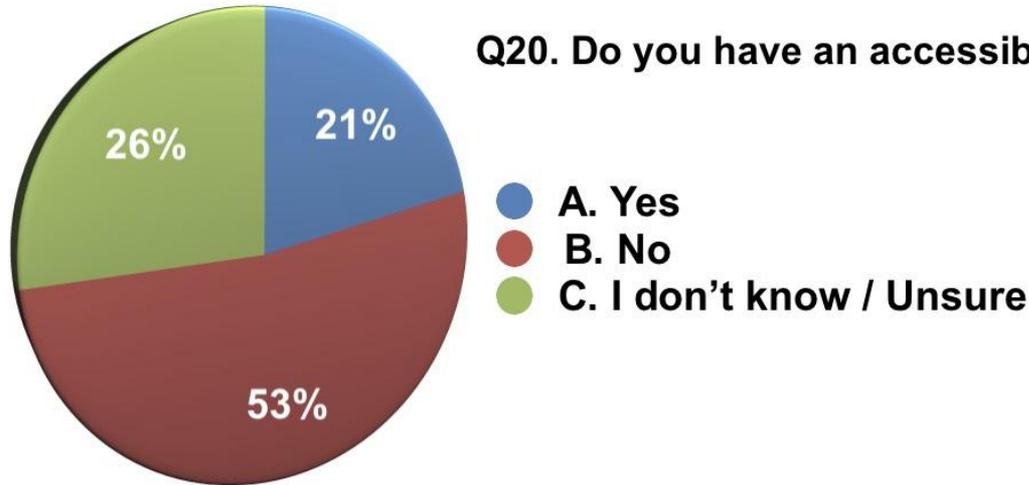
*212. Accordingly, the Commission **directs** all WSPs to offer mobile wireless service packages that meet the needs of Canadians with disabilities. These include people who are Deaf or hard of hearing, and primarily use video to communicate, as well as people with visual disabilities who use way-finding and Global Positioning System (GPS) apps. WSPs must make these packages available no later than **six months** from the date of this decision. These packages must include access to 9-1-1 service and be based on consultations with Canadians with disabilities.*

*214. Accordingly, the Commission **directs** all WSPs to publicize all of their disability-specific products/services on their websites, and expects them to use other methods to publicize this information, such as through call centres, no later than **six months** from the date of this decision.*

Thank you

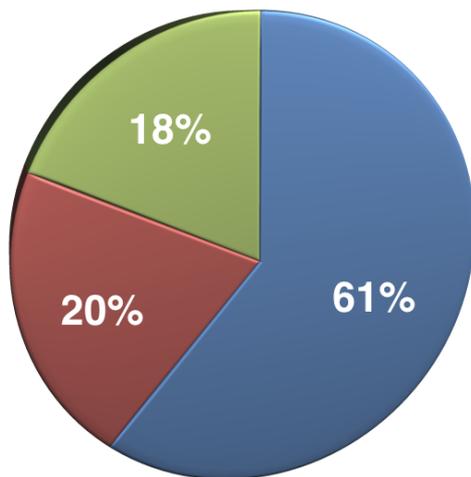
ACCESSIBILITY PLAN: TNC 2018-98

- **53%** do not have an accessibility plan, while **26%** don't know or unsure if they have an accessibility plan.



ACCESSIBILITY PLAN

- **61%** had a hard time/great difficulty getting an accessibility plan, **18%** are not sure.

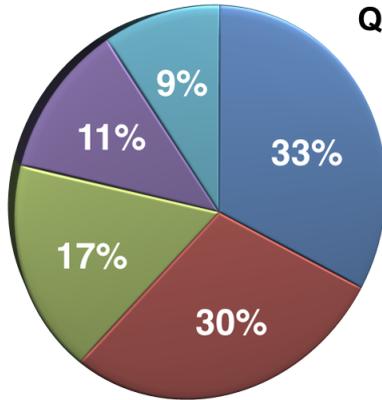


*Q11. Did you have hard time getting an accessibility plan?
(choose only one)*

- Yes
- No
- I don't know / Unsure

ACCESSIBILITY PLAN

- **33%** tried to obtain various options of accessibility plans (miscellaneous)
- **30%** wanted the \$20.00 plan (Rogers, Telus), the remaining **17%** were trying to request the free 2 GB (Bell). The last **11%** already had a grandfathered plan and were trying to keep it.

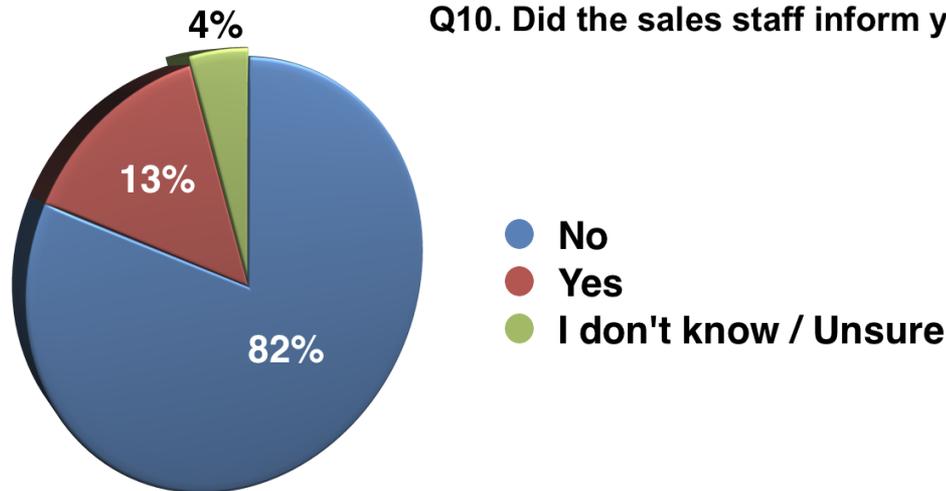


Q12. If yes, please describe the accessibility plan
(select all that apply):

- Other - please describe plan and type in text box:
- \$20.00 discount
- 2 GB free
- Grandfathered plan
- \$15.00 discount

ACCESSIBILITY PLAN

- **82%** were **not informed** of any type of accessibility plan associated with Deaf, Deaf-Blind or Hard of Hearing.



ISSUES and CHALLENGES - Dec. 2017 10GB for \$60.00 “Debacle”

Many DDBHH Canadians subscribed to the 10GB for \$60 plan and took advantage of accessibility plans to bring the final cost down to **10GB for \$40** due to **video calling needs**.

- The majority were told by their WSPs they could not have their accessibility discounts applied to their data plans.
- Common scenario: many experienced rude and refused accessibility plans
- DWCC Chair had to mediate and go back and forth to get many accessibility plans resolved.
- DWCC et al Recommended Resolution: **Get the plans and then wait a few days to deal with the accessibility discounts.**



ISSUES and CHALLENGES - Creating Obstacles

Accessibility Plan - Not ideal, cannot be “one size fits all”

- Those who have **\$230.00** phone plans with up to **15GB**, the **\$20 accessibility plan** discount per Deaf person, still paying \$200.00 bill, therefore \$20.00 is no benefit for them.

Inventive Rules and Excuses for not allowing the Accessibility Plan

- Those wanting better phones, newer phones, for better quality of video calls, are **disallowed** the accessibility plan, that itself is a discriminatory practise.
- Other situations, asking them to pay full amount for the phone and **not allowed** to have *Accessibility* plan.
- Claiming that customers **cannot apply** another “discount” when it is not a discount. It is an **accessibility right**.

RECOMMENDATIONS

- **Specialized Accessibility Plans cannot be refused if there is clear proof that the person qualifies** - that they are a member of an accessibility group. No matter if there is a different “deal” or “discount” going on, the accessibility plan is applied regardless. **It is a matter of accessibility, period.**
- **Reconsideration of the current accessibility plans.** Better accessible plans offered with more data for less. More data for our accessibility group is functionally equivalent to other Canadians. **10GB for \$40.00, 15GB for \$55, 20GB for \$70.**
- **DDBHH Canadians should not be forced to pay for the additional package offerings if they cannot benefit from them.** ie. Call Waiting, Conference Calling, & Evening and Weekend Plans.

RECOMMENDATIONS - PROMOTION

- **Promote the Accessibility Plans, on single-page web page for ease of print-out.**
 - www.rogers.com/accessibleplan
- **Point of Sales (POS) systems must include accessibility plan options,** both via the sales website and on in-store cashier terminals, including the authorized retail reseller locations.
- **Direct the CWTA to produce ASL and LSQ videos** about the availability and existence of Accessibility Plans or discounts, and to contact your company

RECOMMENDATIONS - Telecom Accessibility Departments

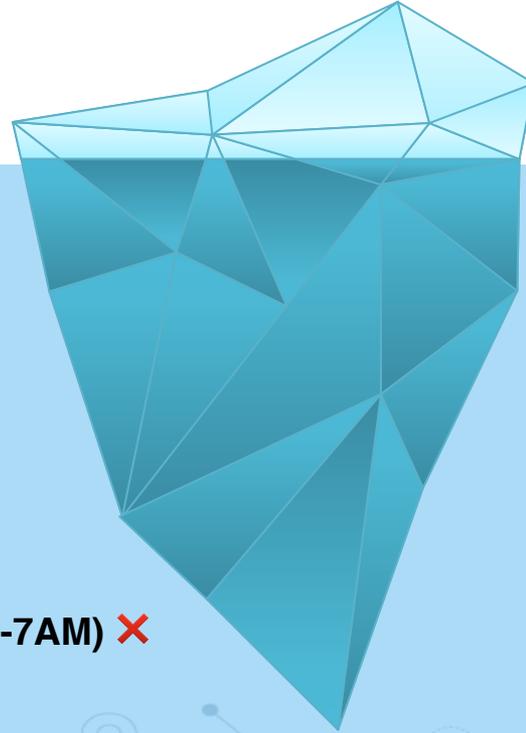
- **Designated and specific Accessibility Department phone numbers and e-mail addresses.** This is to avoid the quagmire of application processes for accessibility plans.
 - accessibility@telus.com

Anatomy of Data Package Pricing



Data Plans 📱

- Video Calling, Messaging
- Video ASL & LSQ News



Can not use:

- Voice plan ❌
- Conference Calling ❌
- Call Waiting ❌
- **Advanced Voice Mail ❌**
- Family Calling LD ❌
- **Evening & Weekend (6PM-7AM) ❌**

Can use:

- 911 Emergency Access Charge - ✅
- Call Display On ✅
- Call Display Outbound Call ✅
- **Voice minutes (pay only when used) ✅**

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**DEAF-BLIND
EXPERIENCES AND
ISSUES**

DEAF-BLINDNESS

- Inability to use one sense to make up for the loss of the other
- Impacts the ability to
 - independently communicate
 - access information
 - work and travel

DEAF-BLIND: USAGE AND ISSUES

Deaf-Blind consumers use wireless services for:

- Text with 9-1-1
- Video communication (ex: sign language relay services)
- Way-finding
- Accessing digital information when unable to access print information

Issue: Flash sales not accessible for Deaf-Blind

- Ex: 10 GB for \$60 month in December 2017
- Deaf-Blind hear about flash sales “late“
- Deaf-Blind cannot make necessary accessibility related arrangements to buy in

DEAF-BLIND RECOMMENDATIONS

Telecom staff to

- Receive better training on Deaf-Blind customers' needs
- Be knowledgeable of
 - Accessibility plans and discounts
 - Text with 9-1-1 services
 - Working with Deaf-Blind customers

Telecom companies to

- Incorporate grace periods for flash sales in Accessibility plans for all DDBHH consumers

'Nothing about us, without us!'



"Accessibility must be a first thought, not an afterthought"

~ Tom Wheeler, FCC Chairman 2013 - 2017 (2015)

CONTACT INFORMATION



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