



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.



Telecom Sales Experiences of Deaf, Deaf-Blind and Hard of Hearing Canadians

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About the Joint Intervenors

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 Advocacy Association Nova Scotia (**DAANS**), collectively referred to as **DWCC et al**, advocate for the full inclusion of diverse members within the Canadian Deaf, Deaf-Blind and Hard of Hearing (**DDBHH**) community in Canadian society. The spectrum of DDBHH life experiences range from those with cognitive delay, immigrants learning English or French as a second language, those with various degrees of hearing loss, those with the unique “double” disability of DeafBlindness, and finally native ASL/LSQ users.

The four intervenors introduce themselves as follows:

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, Deaf-Blind 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

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.

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. The CNSDB advocates for new and improved services, promotes public awareness of deaf-blind issues, and disseminates information in order to 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 DeafBlindness, 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.

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.

Survey Analysis Highlights

Demographics

- **76%** of the **53 respondents** identified as Deaf, and 22% identified as Deaf-Blind
- The top four (4) provinces respondents originated from were Ontario (**21**), British Columbia (**12**), Quebec (**7**), Nova Scotia (**7**).

Issues with Telecom Service Providers

- Reported statistics for issues with sales experiences with specific telecom issues: **33%** of complaints were with Bell, **31%** were with Rogers, **27%** were with Telus.

Communication

- **43%** reported they communicated with sales staff by Phone (using TTY, IP Relay or SRV Canada VRS), **33%** reported In-store (walk-in) experiences, **18%** used Live Chat Online through the service provider's website and **6%** used email.
- **81%** with store-based salespeople, respondents wrote notes back and forth (with pen and paper), **13%** used other methods such as (hand) gestures or had a CODA customer service person serving them as customers.
- **81%** were not aware they could request a sign language interpreter to personally meet and communicate with a retail staff person.

Retail Staff Experience

- **70%** reported they interacted with staff that showed a willingness to meet them, while **30%** did not have a positive experience with the sales staff.
- **71%** had no problem understanding the plain language that was used in person or online., however the remaining **29%** had difficulties.
- **42%** felt that the companies did not make an effort in ensuring accommodating Deaf, Deaf-Blind or Hard of Hearing communication needs.

Accessibility Plans

- **82%** were not informed of any type of accessibility plan associated with Deaf, Deaf-Blind or Hard of Hearing.
- **61%** had a hard time/great difficulty getting an accessibility plan
- **33%** tried to obtain various options of accessibility plans. **30%** wanted the \$20.00 discount (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.

Evidence

- Many could not produce evidence because they were calling the telecommunications service providers through SRV Canada VRS so they were unable to produce a paper trail to complement the survey process.

Deaf-Blind Issues Summary

The Deaf-Blind face unique challenges due to the loss of both vision and hearing, resulting in being unable to use either sense to make up for the loss of the other. This can cause a major barrier to accessing communication, information and getting help in emergency.

Some key points:

The Deaf-Blind have great need for accessible technology that allows them better access to communication, information and emergency services. Accessible technology, combined with wireless services (Data, Text, Voice) increases independent access to things that are inaccessible in other formats.

The Deaf-Blind face greater barriers to employment, resulting in lower income. While the Deaf-Blind face even greater need for accessible technology, high costs of wireless services, especially data, create huge barriers. Those who have the greater need also face the greater barriers to accessing what they need.

The Deaf-Blind face bigger barriers to interacting with wireless service providers. Some of those include but are not limited to; being unable to get to retail stores on their own due to being unable to find their way around, being unable to communicate with retail store staff due to not being able to see to write notes or hear to have a voice conversation, not seeing or hearing about information that is distributed in mainstream media, not being able to make a voice call or a VRS call or a relay call independently due to the combination of deafness and blindness, and having very limited or no access to services that would assist them in doing all the above things.

Many Deaf-Blind missed out on the 10 GB for \$60 flash sale plans in December 2017 because they did not find out about them in time or they were unable to get to the retail stores or make the phone calls or arrange the assistance they needed in order to do it, within the very short period of time. The Deaf-Blind were at a tremendous unfair disadvantage.

Additionally, the Deaf-Blind have greater need for accessible Text with 911 (T911 services) because they are much more vulnerable in emergencies and have far fewer ways of accessing help.

Recommendations

Accessible Plans

1. Specialized Accessibility Plans cannot be refused if there is clear proof that the person qualifies.
2. Reconsideration of the current accessibility plans.
3. DDBHH Canadians should not be forced to pay for the additional package offerings if they cannot benefit from them.

Retail Store Experience

4. Establish and designate *Accessible Centre of Excellence* telecom company flagship stores.
5. Employ DDBHH people with ASL and LSQ fluency into the company stores.
6. Where the option listed above is not feasible, sign language services are provided with advance request and on demand (Video Remote Interpreting).
7. Provide in-store tablets such as iPads that play the ASL and LSQ videos:
 - Company accessibility services offerings, including Accessibility Plan information
 - Wireless Code - What Are Your Rights?
 - Wireless Terminology videos
 - Text with 9-1-1 videos

Retail Staff training

8. Mandatory staff training on accessible company services and products.
9. Orienting staff on tablets (iPads) that will have ASL and LSQ video playback.

Online Sales Resources

10. Promote the Accessibility Plans, on single-page web page for ease of print-out.
11. Point of Sales systems must include accessibility plan options, both website and on in-store terminals, including the authorized retail reseller locations.

Telecom Company Accessibility Departments

12. Designated Accessibility Department phone numbers and e-mail addresses.
13. Employ ASL and LSQ fluent Deaf, Deaf-Blind and Hard of hearing people to handle the front-line inquiries and complaints or issues with the accessibility services.

Commission for Complaints for Telecom-television Services (CCTS)

14. Create ASL and LSQ videos with the full consultation of DWCC et al that describe the CCTS Complaint Processes.

15. Employ ASL and LSQ fluent Deaf, Deaf-Blind and Hard of hearing people to handle the CCTS front-line complaints and inquiries

16. CCTS produce annual detailed [Accessibility complaint reports](#).

Canadian Radio-television and Telecommunications Commission (CRTC)

17. Establish an Accessibility Office department and hire Deaf, Deaf-Blind or hard of hearing to manage related accessibility issues.

18. Create a Telecommunications Accessibility Fund.

Canadian Wireless and Telecommunications Association (CWTA)

19. Direct the CWTA to produce an ASL and LSQ videos about the availability and existence of Accessibility Plans or discounts, and to contact your company

DWCC and Deaf organizations

20. Produce ASL and LSQ vlog to be shared across Canada with information about providing organization, or association members with proof of membership.

Terminology

ASL - American Sign Language - a naturally occurring visual gestural language with distinct grammar, syntax and vocabulary that is not based on or derived from a spoken language. ASL does not follow English word order, and uses facial expression for grammatical markers. In addition, physical affect markers, spatial linguistic information and fingerspelling are all incorporated into the unique syntax and linguistic features of the language. Like other languages, ASL is comprised of arbitrary symbols brought together by “syntactic, phonological semantic, and pragmatic rules.” The main users of ASL are culturally Deaf; however other groups may also prefer this language.

LSQ - Langue des signes québécoise - is the natural language sign language of the Deaf Francophone community in Canada. With other signed languages, LSQ is a naturally occurring language with grammar, syntax, vocabulary, and lexical information that is conveyed visually and manually. The majority of LSQ users are culturally Deaf.

Culturally Deaf

- People who identify themselves as **culturally Deaf**; people who are born deaf or became deaf early in life, usually before language acquisition (i.e. pre-lingual)
- Rely mainly on or have a preference for using sign language to communicate (ASL or LSQ)
- Prefer to use sign language interpreters and visual assistive technology (e.g. Video, text messaging, captioning)
- Deafness is a cultural and linguistic distinction requiring an accommodation, rather than Deafness being considered a disability.
- Some individuals may also use assistive listening devices (e.g. hearing aids and/or cochlear implants) - yet have strong ties to Deaf Culture and chose to be bi-cultural.

Oral Deaf

- People who are born deaf or became deaf early in life, usually before language acquisition (i.e. pre-lingual)
- Educated in the oral method and rely mainly on oral communications (e.g. speaking, speech-reading)
- Generally, depend on a visual representation of spoken language (e.g. written text, captioning, speech-reading)
- Typically identify with the hearing culture but may have ties to deaf culture, or choose to be bi-cultural and identify with both.

Deafened or Late deafened

- People who became deaf post-lingually (after learning speech) and have now lost the ability to understand speech with or without assistive listening devices (e.g. hearing aids, cochlear implants, wireless transmitters, etc.)
- Typically educated in a spoken language either in English or French
- Generally, depend on a visual representation of spoken language for communication (e.g. written text, speech-reading, captioning, sign supported English)
- Typically identify with hearing culture, but may have ties to deaf culture or choose to be both

Hard of Hearing

- People with hearing loss ranging from mild to profound, who may have been born with the condition, or developed it later, are able to understand speech with or without assistive listening devices to maximize residual hearing (e.g. hearing aids, cochlear implants, wireless transmitters, etc.)
- Primarily relies on auditory communication utilizing any residual hearing
- Prefer to use auditory devices to maximize residual hearing (e.g. hearing aids, amplified telephones, etc.), uses captioning devices (e.g. captioned telephones, real time captioning services) and may also utilize speech-reading
- Most identify with hearing culture and very few use any kind of sign language

Deaf-Blind

- People who have significant, but not necessarily total, loss of both vision and hearing
- Rely mainly on tactile signing (signing in the palm of the Deaf-Blind person's hands, close-up signing, or close up speechreading).
- May be culturally Deaf, deafened, oral deaf, or Hard of Hearing and communication preference will vary accordingly.
- May use supplemental communication systems like [ProTactile](#)

Contact information

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