



COMITÉ POUR LES
SERVICES
SANS FIL DES
SOURDS DU
CANADA

Canadian
Association of the Deaf



Association
des Sourds du Canada



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January 7, 2019

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

Re: CAD-ASC et al.'s Intervention for [CRTC TNC 2018-422](#) - Call for comments - Proceeding to establish a mandatory code for Internet services

Dear Secretary-General,

Canadian Association of the Deaf-Association des Sourds du Canada (**CAD-ASC**), Deaf Wireless Canada Consultative Committee-Comité pour les Services Sans fil des Sourds du Canada (**DWCC-CSSSC**), Canadian National Society of the Deaf-Blind (**CNSDB**), and Deafness Advocacy Association Nova Scotia (**DAANS**) -- collectively, "**CAD-ASC et al.**" -- jointly participate in the [CRTC TNC 2018-422](#) proceeding.

CAD-ASC et al. is submitting its first intervention to fully demonstrate and present the Canadian Deaf, Deaf-Blind, and Hard of Hearing (**DDBHH**) experiences with the internet industry with the goal of explicitly addressing their accessibility issues and concerns in the proposed Code for Internet Services. In other words the proposed Code would ultimately better address DDBHH Canadians' concerns related to their contracts, bills, and related barriers they face as internet consumers. CAD-ASC et al. would like to ensure that the Commission has an obligation to establish a mandatory Code clearly set out basic rights for internet consumers including DDBHH Canadians and ensuring that the internet industry is accessible for DDBHH Canadians.

Members of CAD-ASC et al. introduce themselves as follows:

1. **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.

2. **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; and
- Accessible wireless emergency service provisions in Canada

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.

All four organizations are experienced and well versed in the full range of telecommunication and internet accessibility issues for DDBHH Canadians.

DEAF, DEAF-BLIND AND HARD OF HEARING CANADIANS

To understand our accessibility group, reliable statistics on Deaf Canadians are hard to collect, and no two organizations seem to agree on the numbers involved. CAD-ASC's standard practice uses the traditional 'one in ten' formula for estimating statistics, with strong disclaimers. This formula estimates that there are 357,000 culturally Deaf Canadians and 3.21 million hard of hearing Canadians. It is CAD-ASC's opinion that *no fully credible census of Deaf, deafened, and hard of hearing people has ever been conducted in Canada.* ([CAD-ASC website](#)).

CNSDB estimates there are 69,700 Deaf-Blind Canadians over the age of 12 living with the dual disability of deafness and blindness or a combination of both vision and hearing losses that limit their everyday activities. The [Canadian Helen Keller Centre](#) provided an estimate of the Deaf-Blind population in an earlier version of its website which is now available on [Senator Yonah Martin's website](#).

RESPONSE FOR TNC 2018-422 PROCEEDING

CAD-ASC et al. hereby thanks the Commission for approving the procedural request to file a survey analysis report allowing it to conduct a national quadrilingual survey. In this first intervention, CAD-ASC et al. hereby responds to questions contained in the proceeding and will summarize the responses obtained from the aforementioned national survey into and the further information a survey analysis report to be submitted to the Commission by March 7, 2019.

This intervention focuses on Canadian DDBHH consumers' experiences as DDBHH Canadians related to accessibility issues including contract clarity, bill shock, and barriers, which are provided in this first intervention are based on:

- 1) the collective lived experiences of CAD-ASC et al.'s joint members' experiences; and
- 2) CAD-ASC et al.'s previous findings, analyses and recommendations brought forward to the Commission from previous proceedings.

To start, we will base on the responses to the proceeding questions on our Committee's own experiences and based on observations from our past participations in other CRTC proceedings to best respond here for the consumer group that we represent.

Hence, here are our responses from the joint intervenors as follows:

Q2. If you are a Canadian with a disability, have you encountered barriers related to

- accessing your contract and related documents;
- the clarity of your contract;
- cancelling your contract;
- monitoring data use and preventing bill shock;
- knowing how or where to escalate a complaint about your Internet service;
- understanding service bundles that include Internet service;
- difficulties with changing service providers; or
- other related issues?

If so, please describe the issue and what consumer protection rules you think could have helped to resolve the problem.

R2: Canada ratified the [United Nations Convention on the Rights of Persons with Disabilities \(CRPD\)](#) in 2010, where its Article 9 partly reads as follows:

To enable persons with disabilities to live independently and participate fully in all aspects of life, States Parties shall take appropriate measures to ensure to persons with disabilities access, on an equal basis with others, to the physical environment, to transportation, to information and communications, including information and communications technologies and systems ...

This means persons with disabilities and DDBHH people to have access to information and communications technologies on an equal basis with other Canadians. It is critical when comes to the provisions of information and communication as a part of true accessibility for DDBHH Canadians as a human right because it highlights clear benefits in terms of improved access to information and services, especially in the area of telecommunications.

On May 8, 2017, the UN Committee on the Rights of Persons with Disabilities released its [Concluding Observation on the initial report of Canada](#), which is stated in reference to **Article 21-Freedom of expression and opinion and access to information** reads as:

The Committee is concerned by:

(a) The lack of official recognition of sign languages and that the training programmes for sign language interpreters do not meet minimum requirements to provide a high quality of interpretation;

The Committee recommends that the State party:

(a) Recognize, in consultation with organizations of deaf persons, American Sign Language and Quebec Sign Language (Langue des signes Québécoise) as official languages and their use in schools and establish jointly with organizations of deaf persons a mechanism to certify the quality of interpretation services and ensure that opportunities for continuous training are provided for sign language interpreters.

The UN Committee on the Rights of Persons with Disabilities clearly states that the recognition of Sign Languages ensures the rights to access information, communications and services as outlined in the Convention. Over 45 countries already recognized Sign Languages through their federal legislations. Canada has not yet recognized its two national Sign languages - American Sign Language (**ASL**) and langue des signes québécoise (**LSQ**) as official languages of Deaf people in Canada.

ASL and LSQ are the first languages of Deaf people in Canada, which is the ultimate goal to ensure that there is an amendment in the current Bill C-81: Accessible Canada Act where ASL and LSQ will be recognized as official languages of Deaf people in Canada because these two languages are critical for full accessibility, language rights and civic participation of Deaf communities in Canada. This will make a dramatic improvement in the lives of Deaf Canadians to have their ASL and LSQ recognized as being equal to English and French. This will give these Canadians equal access to the federal government through information, communications, and services that are made accessible to the Deaf community through the use of ASL and LSQ.

One example of this true full accessibility which it means the full removal of barriers for DDBHH customers is to ensure an access to the information in ASL and LSQ with the internet code including contract and terminologies, which is available in English and French. Without those in ASL and LSQ videos available then DDBHH customers do not fully understand what they are signing the contract without seeing the ASL and LSQ.

Therefore, it is more often than not that DDBHH consumers will not completely understand their contracts or understand what rights they have regarding internet contracts and service provisions. It is important to know that clarity and understanding of terms and conditions in the internet contract by customers are actually key to ensuring all Canadians can make an informed choices about the internet services they are purchasing. For DDBHH customers, it is the only way to safeguard their rights and responsibilities to understand the internet contract, the internet code and terminologies when ASL and LSQ videos are available to them.

Additionally, many of the Deaf-Blind face barriers to accessing information unless it is provided in an alternative accessible format. Many are unable to see well enough to access videos and graphical interfaces, creating the need for information to also be provided in plain language on websites or other electronic text formats or large print or Braille.

As with all other Canadians, it is our view, our group especially is behind in information on internet rights due to its lack of ability to receive information through informal or incidental learning opportunities in society where their first languages (ASL and LSQ) are not available to them. Let's take a moment to explain what this means and how it impacts this group in everyday activities and then return to its application for availability of information in ASL and LSQ.

Incidental, Random or Informal Learning

Definition

DDBHH people generally do not obtain information the same ways that people who can hear have the ability to hear affords hearing people to **randomly** absorb and retain auditory information. Incidental or random learning is comprised of various forms of learning involving aural communication not designed around formal learning, and information that is not structured or organized in terms of objectives, time or learning support. In particular, the Deaf-Blind face huge additional barriers to random or incidental learning due to being unable to see as well as being unable to hear.

Incidental or random learning may occur as a by-product of day-to-day activities, events or communication that are not designed as deliberate educational or learning activities. It is learning that results from daily activities related to paid or unpaid work, family or community life, or leisure.

Examples may include learning that takes place during the course of a meeting, whilst listening to a radio programme, or watching a television broadcast that is not designed as an educational programme. Everyday people obtain information from informal learning avenues such as overhearing people talking in a coffee shop, or information learned from conversations between people in a CRTC public hearing room.

Sources:

- UNESCO-UNEVOC: [Incidental or Random Learning](#)
- UNESCO-UNEVOC: [Informal Learning](#)
- [European centre for the Development of Vocational Training \(CEDEFOP\)](#)
- Organization- [UNESCO Institute for Statistics](#) - Data for the Sustainable Development Goals
- [UNESCO Institute for Statistics](#)
- [UNESCO Institute for Statistics](#)

Incidental and informal learning impacts DDBHH Canadians because we constantly miss the information around us. As a result, information is not always freely shared with us. This means DDBHH tend to miss the important information, while hearing people can hear, access and learn information constantly, 24 hours, 7 days a week simply because they can overhear other people's conversation. DDBHH people cannot hear the radio and they often miss important information.

According, to J. Freeman King 's article, "*Incidental Learning & The Deaf Child.*" King wrote, "For children who can hear, incidental learning constitutes a major portion of their social development and world knowledge. However, for the deaf child, even though surrounded by this type of learning, it is often not accessible". (Source: [Incidental Learning & The Deaf Child](#))

Those who experience dual disabilities, such as Deaf-Blind are in even more of a disadvantage, because they might need additional accessibility, such as larger print, Braille or electronic formats. The availability of alternative formats for Deaf-Blind people is critical to ensure the access to information is received on an equal basis. Most of the Deaf-Blind in Canada have very limited or no access to the Intervenor or SSP services they require in order to access information and participate in the community on a day to day basis.

Additionally, the Commission may not realize, when it comes to emergencies such as natural disasters, forest fires, and hurricanes, information is being shared via audio sources, radio, television, internet, and oftentimes without taking accessibility requirements into account, DDBHH are often the last to know and are at greater risk for safety and awareness of current emergency situations.

In contrast, the United States and some international countries have established practices and protocols to have sign language interpreters standing next to the emergency personnel on TV and it is there that DDBHH have full access to the information and know what to do, while in Canada we do not have this same experience therefore we are left behind and left out with no avenues or access to the information shared through incidental learning. If there was interpreter provided, and consistent captioning, (meaning the captions need to be also applied online as well) then there is full accessibility and inclusivity of DDBHH Canadians through disasters, and they are kept safe and aware to make the correct choices of actions.

Thus, DDBHH people don't have constant access to evolving and changing information and often miss out because the information was not in their own language (ASL and LSQ), with English and French as their second languages. Therefore, they need to have an access to information in sign

language, Canada's two national sign languages: American Sign Language (ASL) and langue des signes québécoise (LSQ).

In addition, there are DDBHH experience with the barriers regarding to the Internet code, contract and terminologies on increased lack of accessible information with regards to:

- the clarity of your contract;
- cancelling your contract;
- monitoring data use and preventing bill shock;
- knowing how or where to escalate a complaint about your Internet service;
- understanding service bundles that include Internet service; and
- difficulties with changing service providers; or
- other related issues?

CAD-ASC et al. believes that it is critical for the Commission to establish mandatory requirements for the Internet code, which include accessible formats for all DDBHH customers such as ASL and LSQ videos; and alternative formats such as: electronic plain text, Braille, large-text print outs. It is human rights for DDBHH to receive the same information available in English and French in their sign languages (ASL and LSQ) on equal footing.

Clarity of Contracts, Cancelling Contracts and Bill Shock

The primary goal for this Internet Code is to help and ensures that DDBHH customers must be aware of their rights and responsibilities when signing an internet services contract so that can avoid bill shock. In order to ensures their rights as DDBHH Canadians, the clarity of contract requires accessible videos in ASL and LSQ for DDBHH consumers.

Unfortunately, none are currently available specifically on the Internet Code, and this creates barriers when it comes to understanding or cancelling of contracts because the contract itself creates the difficulty for DDBHH customers to ensure that they understand about the importance for them to monitor the internet data usage to prevent their bill shock or the process about how to change the service providers by cancelling the contract.

CAD-ASC et al. recommends that ASL and LSQ videos be developed for the Internet Code that will protect DDBHH customer rights and responsibilities.

Referencing ASL and LSQ Accessibility in the Wireless Code

As the Commission sets out policy items #381-383 in the [Wireless Code \(TRP 2017-200\)](#), it is our first recommendation that the Commission likewise mandates ASL and LSQ videos summarizing the Internet Code in one initial video. The videos must also include captioning and electronic text transcripts for these videos are also needed and required.

CAD et al. expects survey respondents to request that terms commonly used in internet services contracts and related also be made available in ASL and LSQ. This is CAD-ASC et al's second recommendation, as with TRP 2017-200 item numbers #377 and #378.

However, in reference to #376, CAD-ASC et al. wishes to make note the case for resources might be slightly different with the Internet Code. Our group has had direct and positive experience with video production experiences with the CWTA and we feel they have gained enough experience with the producing of such videos, and should once again be made to be "*an active participant and provide support as appropriate,*" however, with the Internet Code, it rather should be the Internet Service Providers (ISP) funding such video projects and that CAD-ASC et al. sees that it is

“appropriate for those companies to assume responsibility for the creation and promotion of common terminology sign-language videos (in ASL and LSQ).” Once again, CAD-ASC et al. recommend that it still remain important *“to ensure that the Deaf and hard of hearing community is involved in all stages of the video-making process, including the identification of those terms that would be considered “common terminology.”*

Lack of Understanding and Awareness on Data Management

CAD-ASC et al. is finding that not only with the Wireless Code, but now with the Internet Code, the one biggest challenge with the DDBHH Canadians is due to lack of incidental learning, as explained above, they are really not aware of **data management tools** available to them. Our joint party hopes to strengthen this position with our survey results.

Our third recommendation would be to produce such videos that expand on and describe data management and the tools available for this. However, to learn from the series of videos done for the Wireless terminology videos, because of data management being a singular concern, in order that the definition is not lost from within a series of videos, there needs to be a separate and distributed video on data management and tools.

Complaints

Regarding the complaint process about the Internet service, CAD-ASC et al. are concerned that there is a lack of ASL and LSQ videos on the complaint process regarding Internet services for DDBHH Canadians and this represents the lack of consumer protection for DDBHH Canadians due to inaccessible information presented to them.

CAD-ASC et al, even after the Wireless Code, and the Accessibility Plan releases, still gets lots of messages with regard where to go to complain and find that not all departments have accessibility. It is still happening even in year 3 of DWCC’s existence. CAD-ASC et al. still finds its DDBHH group that they represent these consumers still don’t understand or are not aware of the steps to resolve complaints. This still needs to be resolved. It is critical to ensure that there are accessible ASL and LSQ videos produced in consultation with CAD-ASC and DWCC as they have developed standards for high quality of educational videos with the CWTA, and several other telecom or wireless companies.

Fact is, unfortunately, two organizations or companies did not consult with us until late in their production stages and unfortunately the videos did not meet the standards for full accessibility for Deaf, Deaf-Blind and Hard of Hearing Canadians and one company redid their video as a result. CAD-ASC et al. wishes to save resources and costs for everyone to do this project correctly and just once. We are the experts as we know the audience of these videos, **please do contact us/** Fact is, from our combined video production experience from 2003 to this date, we have developed, applied and maintained ASL and LSQ video production standards with our own referral and network for ASL and LSQ signers and consultants, and include video production consultants that can be present and available from day one of the video production project.

Accessible Customer Services

When DDBHH customers walk into the internet retail stores where there are no ASL and LSQ videos for Internet code, the full information is not provided. ASL and LSQ videos are once again needed to be produced to explain internet service and specific contract terminologies. This is required for DDBHH customer protection whereas the Internet Code safeguards their rights and responsibilities for DDBHH customers to understand their internet contracts by seeing the internet terminology videos in ASL and LSQ on equal footing with other Canadians who read the print copy of the internet contract.

The challenges is when it comes with DDBHH customers to would like have these questions about the contract extension, or disconnection issues, or changing to a different internet service provider, or reconnection issues, or refunds or cancellation fees where there are accessibility barriers that are faced with. The fact is that not all companies have designated department phone numbers and email addresses to field the issues that are delivered. Phoning to the generic 1-866 numbers has created so much confusion and strife for DDBHH customers, with phone trees that are not accessible with relay services. There need to be people who have the lived experience, such as those who are Deaf, Deaf-Blind or Hard of Hearing themselves in the departments, running the departments and answering the front-line responses with empathetic and knowledgeable responses because they understand the DDBHH experience themselves.

Telecommunication company, including Internet Service Providers (ISP) websites must include information about these designated Accessibility stores. Staff persons should make video messages to the local DDBHH community announcing Accessible Store locations and regular schedules information. Scheduling information should include the store's chosen specific dates and times that several options of accessibility are available for DDBHH customers. Also, staff must be well-trained and well-informed on all Accessibility services, devices and features.

Therefore, CAD-ASC et al. strongly recommends, in its fourth and fifth recommendations, that designated telecom company Accessible flagship stores in major metropolitan cities identified as "Accessibility Centres of Excellence" with the provisions of:

- DDBHH staff fluent ASL or LSQ
- Sign language interpreters at the designated stores available on regularly scheduled days and times, with more than one option per week provided to DDBHH customers.
- Video Remote Interpreting options to be available.
- Coverage of all related costs for the Deaf-Blind to have an Intervenor or Support Service Provides (SSP) with them to facilitate communication and provide additional environmental information as needed.

Many Deaf-Blind cannot come to the retail store unless they are able to have an Intervenor or Support Service Providers (SSP) bring them and then facilitate communication in their preferred communication method. The sixth recommendation is that all costs related to Deaf-Blind communication are provided by the Internet Service Provider, after all this benefits both the Deaf-Blind person and the customer service agent.

As seen in the previous [survey report for the proceeding TNC 2018-246](#), there is an alarming rate of 81% of respondents spent their time communicating with sale staff by writing back and forth on pen and paper because DDBHH customers did not know that they can get sign language interpreters for store visits. This is not equal communication and CAD-ASC et al. believes that it also applies to store visits for Internet services as well too with same communication barriers.

Public and Community Education

Videos are not the only medium to provide education. Deaf people need engagement and opportunities to ask questions in ASL and LSQ, to understand better and have hands-on opportunities. Our group is struggling with limited resources, and we need to have a place or a source of funding to run a project for up to two years where we have a dedicated team in providing community education and workshops with **data usage management education and tools**. The eighth recommendation is to provide workshops that provide community education and training.

Not only that, it would be an opportunity to provide updates in information and education about other telecommunication decisions in Canada with information shared and rooted from the following

policies: TRP 2016-496, TRP 2017-182, TRP 2017-200, TRP 2018-475, and TRP 2018-466. **Information about Steps for Complaints, Accessibility Plans, Text with 911, and IP Relay Updates can and will be shared in these community education sessions.**

Funding Challenges

The Canadian Administrator of VRS (CAV) currently has funding for community education with Video Relay Services, CAD-ASC et al. questions why can't there be another similar opportunity for such community education on other important internet issues in Canada?

CAD-ASC, DWCC and DAANS would like to manage such a project providing workshops in both ASL and LSQ, however, there is no telecommunications accessibility funding (TAF), thus there is no funding source available in Canada that fits the criteria for such a project. CAD-ASC, DWCC and DAANS have dedicated and committed personnel willing and available to educate and update the general DDBHH community, and already has ideas of organizations to partner up with, but it needs its own funding and resources to manage such a project, which it is our biggest barrier. This was previously mentioned not only in the TNC 2016-116 public hearing [here](#)

4656 Recommendation number seven, Telecommunication Accessibility Fund. The CRTC here, as you know, has created a number of different funds for specific purposes, some related to accessibility such as the Broadcasting Accessibility Fund, otherwise known as the BAF. We strongly recommend that the Commission establish a similar new funding mechanism through a central contribution fund for the provision of accessibility to any telecommunication services, including TEXT with 9-1-1; an independent and impartial funding body supporting innovative projects that provide solutions to promote accessibility of all telecommunication services content in Canada.

4657 It would be of a similar concept of what the BAF is set out to do.

4658 The funding must be national to provide urban and rural communities, and it will also provide support for these resources for such important projects such as community educational workshops with simplified updated short and quick step-by-step informational and educational videos that are critical and create -- and distribute widely in ASL and LSQ video vlogs.

Also a part of the eighth recommendation is to have funding provided from both the ISPs and WSP's to do two-prong purpose workshops that introduce and educate on **both** the Internet and Wireless Codes to especially educate on data management of both internet and wireless usage, and this will provide an opportunity to expand on other telecommunication service provisions in Canada, ie. Text with 911, IP Relay updates, etc.

The rationale needs to be explained for greater understanding: with the cuts to cost applications for DWCC participation in other proceedings, they have been unable to set aside funds for such a project that they envisioned, as Commissioner Menzies inquired in proceeding TNC 2016-293: A Review of the Wireless Code, paying particular attention to **item #4718 where Commissioner Menzies wanted to ask about community education, in this [transcript](#):**

4708 COMMISSIONER MENZIES: I understand

4709 In terms of that, the -- your survey indicated that -- obviously as we've been talking about data, is that it's a concern, like you said, unlimited. When it comes to notification of data usage, most of the companies -- all of the companies this week I think have spoken of considerable efforts having been made to ensure people are notified when they're going towards their cap.

4710 Your survey indicates that people within your community are obviously very conscious of that. Are you satisfied that people are able to access appropriate notifications when you're approaching

a data limit and that you're able to access more data when needed or manage -- avoid bill shock I guess is the way I'm trying to put it?

4711 MS. ANDERSON-KELLETT(by interpretation): We all are very conscious, but that becomes exhausting for our community because we want to take full advantage of that video without worrying that we're going to receive bill shock.

4712 We -- everyone uses their phone differently, but we use video communication. It's essential in order to communicate in our native language. I've used Rogers and other apps to look and manage my overage, but when I speak with the deaf community a lot of them are unaware of how to check their data.

4713 MS. MARSH(by interpretation): We didn't mention this in our presentation, but one other concern we have is when we asked in our survey report if the data overage is enough a lot of individuals didn't know what their data limit was, and that's why we said 54 percent of our respondents had between two and six gigabytes, but many also didn't know what their limit was or they've misunderstood and thought that gigabytes meant -- they didn't know if it was for their data or if it was related to their phone memory and capacity. They didn't know the difference.

4714 MR. BEATTY(by interpretation): It's also challenging for our senior citizens, and they are thrilled to have -- be able to communicate by video with their mobile, but they're still unaware of what is entailed in their contract, how to manage their data, and we have -- you know, and that they have to budget data.

4715 And so lots of people do, they use it sparingly, little by little because they want to be very careful in terms of their usage, so that means they don't have the freedom to make the calls like the general public, the hearing public. They can make phone calls and chat all day long without penalty but we have to budget our conversations.

4716 And so that's how I share or explain that with the deaf community. And it's a lot of work to educate the community and to make them aware of their data limits.

4717 MS. ANDERSON-KELLETT(by interpretation): Through the survey, we found that we need to do workshops and educational training and teach our community about data management. Right now we've been busy responding to CRTC's papers, and when we're done with that that will be our next focus and create a project to create awareness for our community, for new immigrants, seniors, and share what the vocabulary means within the contracts and how to manage their data. So we need more awareness and more understanding within our community.

4718 COMMISSIONER MENZIES: *Thank you. That was actually -- you've done a good job of answering my next question again as well, because **I was going to ask what role you saw yourselves playing in being a vehicle to inform your community about their rights and responsibilities in terms of managing these items.***

4719 And it's clear that you do see a role for you, and we will do our best to keep you less busy with CRTC matters in the months and year ahead, as we can, so that you may address those issues.

Therefore, CAD-ASC et al. would like to confirm that it wishes to have a role, but we are struggling with the lack of financial resources in order to do an efficient job of educating our DDBHH Canadian consumer groups. CAD-ASC et al asks the CRTC to mandate pooled in funding, or establish a funding that will be ongoing to include updates to this consumer group for all current and future telecommunications accessibility issues including Internet Code, including Real Time Text, we need the funding to last that long, for the duration of as soon as possible to at least one or two years past the launch of RTT for clarity of RTT 9-1-1 and Text with 9-1-1. The mandated initial, primary use of this fund is to educate on Internet Code and data usage monitoring, changing or cancelling internet contracts, (and Wireless Code to achieve two things in one single action).

Recommendation Summary for Q2:

In order to resolve these barrier issues for DDBHH Canadians that must have consumers protections, it requires the Commission to mandate the broader accessible services within the internet industry on the following points:

Recommendation #1: The Commission must develop a strong mandate requiring ASL and LSQ videos summarizing the Internet Code in one initial video.

Recommendation #2: Common internet services contract terminology and relevant information must also be made available in ASL and LSQ.

Recommendation #3: Production of a separate and stand-alone video that expands on and describe data management and the tools available, in ASL and LSQ languages.

Recommendation #4: Hiring Deaf staffs using ASL and LSQ to interact and work on issues in ASL and LSQ posed by DDBHH consumers;

Recommendation #5: Designating specific stores as Accessibility flagship stores to reduce the misinformation, confusion, and lack of communication by having knowledgeable DDBHH people who can communicate in either ASL or LSQ on site, or interpreting services provisions when such staff is unavailable.

Recommendation #6: Promotion of sign language interpreters provisions in-store, or provision of Video Remote interpreting services in-store.

Recommendation #7: Coverage of all related costs for the Deaf-Blind to have an Intervenor or Support Service Provides (SSP) with them to facilitate communication and provide additional environmental information as needed. This benefits both the Deaf-Blind person and the customer service agent.

Recommendation #8: Pooled in funding, from ISP and WSPs, created to allow CAD-ASC, DWCC and DAANS to embark on a Community Education programme to increase awareness of data management and tools, among other Internet Code, (and seize the same opportunities to provide information to provide other current Canada telecommunication accessibility updates).

Q4. Please read the Internet Code Working Document in Appendix 1.

- What do you think of the Code?
- Does it need to be changed to respond to problems you have encountered with your Internet contract?
- If you think the Code should be changed, please explain the specific problem to address and your proposed solution, with new wording for the Code if possible.
- Please note that this Code is not intended to address issues such as content on the Internet. A full list of issues the Code is not intended to address is in paragraph 45 of this notice of consultation.

R4: CAD-ASC et al. reiterates our rationale that it is critical to develop ASL and LSQ videos summarizing the Internet Code in one initial video, which the detailed information can be provided in the response to the Question 6.

In the Internet Code Working Document from the Appendix 1, CAD-ASC et al. would like to request the revised information should be added to include the SRV Canada VRS with the specific information "Toll-free: 1-888-221-1687 through Voice or SRV Canada VRS" because it will promote

the awareness that DDBHH customers to be aware of their rights that they can reach CCTS through SRV Canada VRS.

Also, CAD-ASC et al. acknowledge that in Internet Code Working Document states the plain language as follows from the specific quotation:

1. Plain language

- i. A service provider must communicate with customers in a way that is clear, timely, accurate, and uses plain language.*
- ii. A service provider must ensure that its written contracts and related documents, such as privacy policies and fair use policies, are written and communicated in a way that is clear and easy for customers to read and understand.*

Therefore, it is critical to ensure the rights for DDBHH customers, CAD-ASC et al. is requesting the Commission to include this critical information in the Internet Working Document to be added in a new section:

2. ASL and LSQ

- iii. A service provider must communicate with DDBHH customers in a way that is clear, timely, accurate through live sign language interpreters and/or video remote interpreting.*
- iv. A service provider must ensure that its written contracts and related documents, such as privacy policies and fair use policies, are available in ASL and LSQ videos and communicated in a way that is clear and easy for DDBHH customers to watch and understand.*

CAD-ASC et al. recommends to include an amendment to the “Objectives” of the Internet Code related to accessibility issues to ensure the rights for DDBHH Canadians and people with disabilities, which it is identified in “iv.” as suggested:

Objectives

The Internet Code will:

- i. make it easier for individual and small business customers to obtain and understand the information in their Internet service contracts;
- ii. establish consumer-friendly business practices for the Internet service industry where necessary; and
- iii. contribute to a dynamic Internet market.
- iv. ensuring accessible services for individual and small business customers to contribute functional equivalency to a dynamic Internet market.**

Q5. Have you heard of the Commission for Complaints for Telecom-television Services Inc. (CCTS)? The CCTS is the industry ombudsman that responds to complaints about the Wireless Code and the Television Service Provider Code, and it is available to help you resolve complaints with your service provider. What do you think would be the most effective way of making consumers aware of the CCTS and of their right to make a complaint related to the Internet Code? Do you think specific additional measures are necessary to ensure that consumers with disabilities are aware of the CCTS?

R5: Yes, CAD-ASC et al. has heard of the Commission for Complaints for Telecom-television Services Inc. (CCTS); however, in the previous survey on 2018-98, it shows that 57% of the respondents are not aware about the CCTS.

Therefore, it requires specific additional measures must be enforced to ensure that DDBHH customers are aware of the Commission for Complaints for Telecom-television Services Inc. (CCTS) because since the Internet Code will be administered by the CCTS for resolving customer complaints about Internet services. It is therefore important to raise awareness to DDBHH Canadians about the complaint process with Internet services is very critical for CCTS to create accessible ASL and LSQ videos about the complaint processes and mechanisms for DDBHH customers to know their rights related to the Internet Code through its CCTS website and to make the services accessible to these Canadians.

Also it is important for the CCTS to be available to help DDBHH customers for resolving any types of complaints with internet service provider by ensuring that the CCTS must able to employ Deaf ASL and LSQ staff to field the complaints by DDBHH Canadians with issues with the internet service providers and all relay services because it will safeguard these specific additional measures are necessary to ensure that DDBHH consumers in the most effective ways to resolve these complaints related to the Internet Code.

Q6. What do you think would be the most effective and appropriate way to ensure that consumers are made aware of their rights and responsibilities related to the Internet Code? Do you think specific additional measures are necessary to enable consumers with disabilities to access information about the Code?

R6: The most effective and appropriate way to ensure DDBHH customers must be aware about the Internet Code is very critical that the Commission must mandate to develop ASL and LSQ videos summarizing the Internet Code in one initial video. Also, the Internet Code must include common internet services contract terminology and relevant information such as data management and the tools should also be made available in ASL and LSQ. The videos must also include captioning and text transcripts are also essential for the Deaf-Blind.

In order to develop an accessible videos on ASL and LSQ about the compliant processes related, it requires to have a full consultation by our groups, include us from the start, and consult with our group on which film companies to contract to. CAD-ASC et al. has gained enough video consultation experience in the Canadian telecommunications industry to learn what works and what does not for fully accessible videos that include Deaf-Blind accessibility.

Some tips include:

- Voiceovers are to be added in the final edit of the and not pre-recorded, for true and equivalent interpretation of the ASL and LSQ messages.
- Captioning is to be timed with the ASL and LSQ signs;
- Transcripts of the videos must be included for Deaf-Blind;
- Dark backgrounds; with the ASL or LSQ person wearing dark contrast colours of clothing against the contrast dark background (not black on black!)
- If there is a video in video, or picture in video, this inset video must be $\frac{3}{4}$ screen with interpreter standing on the first $\frac{1}{4}$ of the screen and allow for more pauses;
- Visual aids (text and visual graphics) in the video will be very helpful for DDBHH Canadians to get a better understanding about their rights and responsibilities in the complaint processes. These complementary visual aids also aid in emphasis or clarification of the signed message.

B. QUESTIONS FOR ALL PARTIES

Q7. Need for the Code

The Commission is of the preliminary view that the creation of the Internet Code is necessary to respond to consumer concerns about Internet services.

Comment on this preliminary view, providing an explanation for your position and supporting rationale.

R7: Just as the Commission deemed it necessary and appropriate to design and implement the Wireless Code, so should the Commission deem it necessary and appropriate to design and implement a mandatory Internet code that must include a strong provision of accessibility initiatives for the Internet code.

CAD et al.'s response will be expanded and reviewed in its survey analysis report due on or by March 07, 2019

Q8. Content of the Code

To facilitate the discussion on the possible content of the Code, please review the Internet Code Working Document in Appendix 1, which is intended to provide parties with a possible model and to stimulate discussion and debate. Comments on the Working Document will further inform the Commission's views on the content and structure of the Internet Code being developed. The Working Document is intended to be written in plain and easy-to-understand language. Options for proposed wording have been provided for some issues.

Adjustments to Internet Code Working Document

- a) Provide detailed comments, with supporting rationale, on the Working Document and any other specific provisions that would enable consumers to better understand their rights with respect to Internet services. Where you consider that changes are necessary, provide an explanation, alternative wording, and supporting rationale. This includes addressing any sections that you consider should be added or removed from the content of the Code. With respect to proposed wording, note that, to the extent possible, the Internet Code Working Document has been designed to be consistent with the language in the Wireless Code, the Television Service Provider Code, and the Deposit and Disconnection Code.

Key provisions

- b) Identify the provisions that you consider to be the most significant in responding to consumer concerns about Internet services, taking into consideration complaint data to the CCTS about the leading complaint issues for Internet services.

Bundles

- c) In your response, identify the issues that you consider to be particularly relevant and/or unique to customers who purchase Internet services as part of a bundle of other communications services. Do you consider that any additional rules are necessary to specifically address the needs of such customers, especially with respect to clarity of contracts and ease of switching providers?

R8: As mentioned elsewhere in this first intervention, CAD et al. proposes that the Internet code

would mandate that ISPs provide their DDBHH consumers with appropriate information in ASL and LSQ when buying, changing or cancelling their internet services contracts. However it is conceivable that internet services could be bundled with landline phone or cable services, for example - neither of which would be explicitly covered by the Internet code's communication requirements made of ISPs.

CAD et al. therefore proposes that the Internet code explicitly require that ISPs make sure that their DDBHH consumers clearly understand and appreciate **not only** the internet contract portion of their bundled contract but also everything else in the bundled contract not already covered by the proposed internet code or any other applicable CRTC codes.

CAD et al.'s response will be expanded and reviewed in its survey analysis report due on or by March 07, 2019

Q9. Application of the Code to ISPs

Since 87% of Canadians with Internet services purchase their retail Internet subscriptions from a traditional telephone or cable company, the Commission is of the preliminary view that limiting the initial application of the Code to large facilities-based ISPs at this time would strike an appropriate balance between addressing consumer concerns and not placing a heavy regulatory burden on smaller carriers or resellers.

The Commission notes that this approach would be generally consistent with the model used for participation in the CCTS, which originally limited the application of the participation requirement to large providers and expanded it, as appropriate, in subsequent policy proceedings. The Commission determined in Telecom Decision 2007-130 that such an approach was consistent with the Policy Direction.

The Commission notes that 73% of consumer complaints to the CCTS in the last year related to five large facilities-based ISPs.

In light of the above, the Commission is of the preliminary view that the initial application of the Internet Code should be limited to the following providers, including all their brands and affiliates that provide services governed by the Code: Bell Canada (including Bell MTS Inc.; NorthernTel, Limited Partnership; and Télébec, Société en commandite); Cogeco Connexion Inc.; Bragg Communications Incorporated, carrying on business as Eastlink; Northwestel Inc. (Northwestel); Rogers Communications Canada Inc.; Saskatchewan Telecommunications; Shaw Telecom Inc.; TELUS Communications Inc.; Videotron Ltd.; and Xplornet Communications Inc.

Comment on this preliminary view, including which ISPs you think the Code should apply to at this time. Where you consider that changes are necessary, provide an explanation, alternative wording, and supporting rationale.

R9: CAD et al. strongly believes that the Internet code must not be limited to certain ISPs. The Internet code must apply to all ISPs regardless of size. After all the Commission itself has formally declared internet services a basic right enjoyed by all Canadians no matter where they live be it large municipalities or remote rural and northern areas.

In [Telecom Regulatory Policy 2016-496](#):

The Commission's determinations in this decision were made with a view to achieving the following objectives:

- *Canadians in urban, rural, and remote areas can access affordable, high-quality*

telecommunications services;

- *telecommunications companies continue to invest in and various levels of government continue to fund robust infrastructure that can be upgraded in the future and that is capable of providing high-quality telecommunications services to Canadians across the country;*
- *Canadians can access innovative service offerings that enhance social and economic development; and*
- *Canadians can make informed decisions about their telecommunications services.*

CAD et al. strongly believes that it stands to reason that if the Commission deems internet services is a basic right for all Canadians including DDBHH customers; therefore it must be applied to the Internet Code governing to all ISPs.

CAD et al.'s response will be expanded and reviewed in its survey analysis report due on or by March 07, 2019.

Q10. Application of the Code to contracts

The Commission is of the preliminary view that the Code should ensure that consumers can benefit from the protections to be set out therein, regardless of

- what region of Canada they live in;
- how they signed up for their Internet service (in person, over the phone, online, etc.);
- what underlying network technology is used to provide their Internet service; and
- whether they purchased the service on a stand-alone basis or as part of a bundle with other communications services

Thus, the Commission is of the preliminary view that the Internet Code would apply to all retail fixed Internet services provided to individuals and small businesses by large facilities-based ISPs in all regions of Canada, regardless of underlying technology or the business models of the ISP.

Comment on this preliminary view. Where you consider that changes are necessary, provide an explanation, alternative wording, and supporting rationale.

R10: CAD-ASC et al. agrees that there are unique considerations for those who live in rural regions and that the Code is can benefit all consumers regardless of:

- what region of Canada they live in;
- how they signed up for their Internet service (in person, over the phone, online, etc.);
- what underlying network technology is used to provide their Internet service; and
- whether they purchased the service on a stand-alone basis or as part of a bundle with other communications services

As well as “whether or not they have accessibility needs, **including DDBHH Canadians.**” This needs to be added to the list above.

CAD-ASC et al. agrees that the Internet Code would apply to all retail fixed Internet services provided to individuals by large facilities-based ISPs in all regions of Canada, regardless of underlying internet medium which the internet passes through to provide internet services by the ISP.

CAD et al.'s response will be expanded and reviewed in its survey analysis report due on or by March 07, 2019.

Q11. Application of the Code – Avoiding duplication with Wireless Code

The Commission is of the preliminary view that since the Wireless Code already applies to mobile wireless data services, including mobile Internet services, it is not necessary for the Internet Code to also apply to such services. In other words, as a result of this proceeding, individuals and small business customers could have their complaints about fixed Internet services resolved according to the Internet Code and continue to have their complaints about mobile wireless data and Internet services resolved according to the Wireless Code.

Comment on this preliminary view. Where you consider that changes are necessary, provide an explanation and supporting rationale.

R11: CAD-ASC et al. agrees that “the preliminary view that since the Wireless Code already applies to mobile wireless data services, including mobile Internet services, it is not necessary for the Internet Code to also apply to such services. In other words, as a result of this proceeding, individuals and small business customers could have their complaints about fixed Internet services resolved according to the Internet Code and continue to have their complaints about mobile wireless data and Internet services resolved according to the Wireless Code.”

In other words CAD-ASC et al wishes to ensure that the issues are kept separate and in accordance with the two Codes. Wireless Code governs wireless and mobile provider issues and packages and customer rights. Internet Code governs internet service provider issues and customer rights.

CAD et al.'s response will be expanded and reviewed in its survey analysis report due on or by March 07, 2019.

Q13. Implementation – Extension requests related to unique barriers

The Commission is of the preliminary view that if any ISP considers that it may face unique barriers that would make implementing a specific provision in the Code technically impossible or financially unreasonable for itself, it should be able to submit a Part 1 application prior to the coming into effect of the Code, seeking an extension to implement those provisions. The ISP should be required to provide detailed evidence and rationale to show that its circumstances are unique and that the burden it faces is exceptional and unreasonable.

Comment on this preliminary view. Where you consider that changes are necessary, provide an explanation, alternative wording, and supporting rationale.

R13: CAD-ASC et al. agrees that if there are unique barriers related to accessibility initiative implementations for specific provisions of the Internet Code, that parties should be allowed to trigger a Part 1 request for extended time, up to no more than 6 months additionally in order to implement such accessibility measures such as production of ASL and LSQ terminology videos.

CAD et al.'s response will be expanded and reviewed in its survey analysis report due on or by March 07, 2019.

Q14. Implementation of the Code – Implementation date

The Commission is of the preliminary view that the Code should be implemented as soon as reasonably possible, to benefit consumers.

Provide your view on when it would be reasonable to have the Code come into effect. Comment on whether you consider that all provisions in the Code should come into effect at the same time or if certain provisions (list which ones) should come into effect at a later date and why.

R14: CAD-ASC et al. agrees that the Internet Code needs to be implemented within six months of the release of a policy decision arising from this proceeding.

CAD et al.'s response will be expanded and reviewed in its survey analysis report due on or by March 07, 2019.

Q15. Implementation of the Code – Application to new, amended, and/or existing contracts

The Commission is of the preliminary view that when the Code comes into effect, it will apply to new contracts, which include contracts that are signed, changed, or renewed on or after the Code's implementation date.

The Commission is seeking comments on whether the Code should also apply to existing contracts, and if so, when and how. See the Internet Code Working Document for options to comment on.

R15: CAD-ASC et al. agrees that the Internet Code needs to be implemented within six months of the release of a policy decision arising from this proceeding.

CAD et al.'s response will be expanded and reviewed in its survey analysis report due on or by March 07, 2019.

Q16. Implementation of the Code – Implementation reports

The Commission is of the preliminary view that ISPs offering services governed by the Code should be required to report to the Commission to demonstrate that they have implemented the Code effectively and on time.

Comment on this preliminary view. Where you consider that changes are necessary, provide an explanation, alternative wording, and supporting rationale.

R16: CAD-ASC et al. agrees that the Internet Code needs to be implemented within six months of the release of a policy decision arising from this proceeding.

CAD-ASC et al. agrees that the Internet Code should be governing the practices of the Internet Service Providers to include the mandate of accessibility initiatives with detailed information about the removal of barriers for DDBHH customers as part of the annual reporting to ensure that the ISP have implemented the Code effectively and on time, which will be reported to the Commission.

The Commission must establish an Accessibility Office that employs DDBHH staffs work on the regulatory perspectives on all internet related accessibility mandates including the Internet Code and must be **more responsible and responsive** with DDBHH Canadians. In addition, the Commission must ensure its processes corresponding with accessibility standards for the compliance of the regulatory measures implemented in line with the proposed Bill C-81: Accessible Canada Act.

CAD et al.'s response will be expanded and reviewed in its survey analysis report due on or by March 07, 2019.

Q17. Administration and enforcement of the Code

The Commission is of the preliminary view that the Internet Code would be administered by the CCTS and enforced by the Commission.

Comment on this preliminary view. Where you consider that changes are necessary, provide an explanation, alternative wording, and supporting rationale.

R17: CAD-ASC et al. agrees that the Internet Code would be administered by the CCTS and enforced by the Commission as long as there is accessibility measures and enforceable provisions that cover and protect the rights and responsibilities for DDBHH customers in place.

Additionally there must be annual reporting of accessibility issues related to the internet code reported within their currently produced annual detailed [CCTS Reports](#) with the inclusion of annual Accessibility complaint reporting.

CCTS should provide detailed statistics clearly tracking complaints from DDBHH consumers by the following categories:

- a. Lack of providing ASL and LSQ video links to DDBHH customers leading to lack of understanding and access to the Internet Code;
- b. Lack of accessibility accommodations such as not providing sign language interpreters in store, and not providing extended trial periods for DDBHH consumers;
- d. Accessible relay services - IP Relay, TTY Relay, SRV Canada VRS; and
- e. Others are detailed in the accessibility issues that DDBHH customers have faced with different barriers.

The CCTS must develop a role to help customers resolve complaints about their broader telecommunications services, including the Internet Code, in the following points:

- a. Hiring a staff person who is Deaf that use ASL and LSQ to field the complaints issues in ASL and LSQ by DDBHH Canadians.
- b. Create accessible ASL and LSQ videos about the complaint processes and mechanisms for DDBHH customers on its CCTS website and make the services accessible to these Canadians. This will promote awareness about the CCTS complaint process on rights and responsibilities to file a complaint with Internet Service Providers through the CCTS.

CAD et al.'s response will be expanded and reviewed in its survey analysis report due on or by March 07, 2019.

Q18. Promotion of the Code

The Commission is of the preliminary view that it will be necessary to effectively promote the Internet Code to ensure that consumers and ISPs are aware of their rights and responsibilities. Comment on what mechanisms should be used to effectively promote the Internet Code among consumers. Provide supporting rationale.

For service providers, provide a summary of your proposed approach to ensuring that sales representatives are knowledgeable about both service providers' and customers' rights and responsibilities regarding the Code.

For all parties, comment on whether specific additional mechanisms are necessary to ensure that customers with disabilities can access information about the Code and have the tools they need to be informed about their rights and responsibilities related to the Code. If so, describe the proposed measures.

R18: As soon as the Internet Code is released, the promotion of the Code must be done in ASL and LSQ videos to effectively promote the Internet Code that DDBHH customers must be aware about their rights and responsibilities. The ASL and LSQ videos must be available on the CCTS website, CRTC website, and each of the ISPs website.

CAD et al.'s response will be expanded and reviewed in its survey analysis report due on or by March 07, 2019.

Q19. Measuring effectiveness and review of the Code

The Commission is of the preliminary view that it will be necessary to review the Internet Code in the future to ensure that it continues to be effective in meeting its objectives as the market evolve

Comment on whether the Commission should plan to review the Internet Code in three or five years and why, providing supporting rationale.

Comment on how the Code's effectiveness should be measured.

R19: CAD-ASC et al. agrees just as the Wireless Code initially was and SRV Canada VRS will initially be, the Internet Code shall be reviewed in three years. The Internet Code must be reviewed every three years to take evolving markets and changing consumer tastes into account without sacrificing DDBHH consumers rights to access the internet industry at par with their hearing counterparts.

After standards for internet services under the Code are established, a review every five years is acceptable. CAD-ASC et al's response regarding the measurement of the Code's effectiveness can also be found in our answer to Question 17 above.

If required, this question will further be answered / reviewed in further detail within our survey analysis report due on or by March 07, 2019

OTHERS

This is an acknowledgment the Commission has approved a national survey once to collect evidences from DDBHH customers on issues around the Internet Code and their understanding of terminology, contracts, cancelling and changing service providers and understanding their rights. The quadrilingual surveys take twice as long to create as English/French surveys due to the logistics of writing, editing, translating, scripting, videotaping, and editing of the videos as well as editing the survey instruments, especially online with logic programming, to ensure that the communities are aware that the surveys are taking place. French survey respondents' answers must then also be translated into English, the language used by most of CAD-ASC et al.'s report-writing team. Finally, once these steps are completed, time is required for CAD-ASC et al. to analyze and summarize the data collected from DDBHH Canadians.

Many DDBHH Canadians are native ASL and LSQ signers so it becomes imperative to provide surveys in these languages- not just English or French. Quadrilingual surveys does provide a full breadth of DDBHH Canadians' relevant perspectives and experiences to contribute to the record as

evidence in CRTC proceedings. Quadrilingual surveys permit DDBHH Canadians to participate in CRTC proceedings in a responsible manner at par with their hearing peers.

CONCLUSION

Once again - *“Accessibility must be a first thought, not an afterthought,”* (Tom Wheeler, FCC Chairman, [source](#)), thus, priority should be focused on resolving accessibility issues for Internet services and the Internet Code. Our accessibility group does not want to see any further experiences of DDBHH Canadians with different barriers in the telecommunications services to these members.

We appreciate the Commission’s to read our first intervention, and CAD-ASC et al. look forward to its further participation in this proceeding, especially with further responses resulting from our survey respondent analysis.

Sincerely yours,

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