

DWCC et al's

FINAL SUBMISSION

for

CRTC TNC 2018-246

November 8, 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



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COMITÉ POUR LES
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November 8, 2018

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

Re: DWCC et al's FINAL Submission for the [CRTC TNC 2018-246](#) proceeding regarding the retail sales practices of Canada's large telecommunications carriers

The four intervenors (**DWCC-CSSSC**, **CAD-ASC**, **CNSDB** and **DAANS**) hereby submit their final intervention which will address the following issues and recommendations to achieve true [functional equivalency](#) for using telecommunication services: accessibility barriers at retail stores experiences, CCTS complaint processes, accessible customer services for DDBHH Canadians, better specialized accessibility plans, better training of sales and technical support agents, and online resources that designates for our accessibility needs of DDBBH consumers.

DWCC et al. hereby thanks the CRTC for the opportunity to participate in the TNC 2018-246 proceeding and provide Canadians who are Deaf, Deaf-Blind and Hard of Hearing (**DDBHH**) perspective of the sales practices of the large telecommunication service provider companies in our natural language - American Sign Language (ASL).

At the public hearing due to time constraints we did not have a chance to outline our organizations so DWCC et al. briefly introduces as:

I. ABOUT THE JOINT INTERVENERS

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. For full organization descriptions, please click [here](#).

II. REFERENCES TO [FIRST INTERVENTION](#)

In the first intervention, we outline outstanding issues raised but were not covered in the survey:

a. Re: Question 5 in the Notice of Consultation, in our response on page 9 of our first intervention "*As an older Canadian, did you find that the service provider made an effort to ensure that you were able to make an informed decision about the telecommunications and/or television services sold or offered for sale? If so, how? If not, what else do you think could have been done to help you to make an informed decision in respect of the sales interaction?*"

1. DWCC et al's survey did not cover this area due to space and time limits. Therefore it does not have any survey responses to offer a response to this question in the Notice of Consultation.

b. Re: Question 14 in the Notice of Consultation, in our response on Page 10 of our first intervention whereas “**Are existing consumer protections sufficient to ensure that Canadian consumers are treated fairly in respect of retail sales practices? If so, how? If not, why not?**”

2. Currently DWCC et al. does not believe DDBHH Canadians have sufficient customer protection when anecdotal evidence points to them being pressured to buy packages that include charges for items or services that they can not use. An alarming rate of 79% respondents do not have or were not aware of the accessibility plans and 81% state they did not know that they can get sign language interpreters for store visits. The companies are pressuring DDBHH Canadians to pay outright for phones in order to get accessibility plans or coming up with what seems to be “arbitrary rules” of whether or not consumers may obtain Accessibility Plans.

c. Re: Question 19 in the Notice of Consultation, in our response on Page 11 of our first intervention whereas “**What should be the Commission's role, if any, in addressing the misleading or aggressive retail sales practices of service providers?**”

3. DWCC et al. is satisfied with the answer it already provided in its original intervention with two additional words added in bold - that being: CRTC must be **more responsible and responsive** in its processes corresponding with the accessibility standards and to ensure there is compliance of the regulatory measures implemented in line with the proposed Bill C-81: the Accessible Canada Act.

d. Re: Question 22, in the Notice of Consultation, in our response on Page 12 of our first intervention whereas “**Should the CCTS's role be expanded to help customers resolve complaints about their broader communications services, including sales practices? If so, please describe what that role should be. If not, please justify.**”

4. Based on CCTS' and DWCC et al's responses at the public hearing on October 22, 2018, DWCC et al. strongly recommends that CCTS should provide detailed statistics clearly tracking complaints from DDBHH consumers by the following categories:

- a. Accessibility Plan issues, such as denials or expiration of such plans
- b. Data overages
- c. Lack of accessibility accommodations
- d. Accessible relay services - IP Relay, TTY Relay, SRV Canada VRS
- e. Sales practices

5. The CCTS must develop a role to help customers resolve complaints about their broader telecommunications services, including sales practices 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 sale agents through the CCTS.
- c) Provide detailed tracking of accessibility service issues including issues around the Accessibility Plan.

6. DWCC et al. strongly believes that CRTC must issue a Telecom Sales Practice Code with enforceable provisions that cover and protect the rights and responsibilities for DDBHH customers. CCTS would be the best party to enforce such a Code.

III. DEAF-BLIND

7. If there is a new code for sales practises as a result of this proceeding, CNSDB would like to re-emphasize that a grace period be allowed for flash or seasonal sales for Deaf-Blind who frequently miss out on flash sales due to a number of factors.

8. Being Deaf-Blind can limit and / or delay access to information, preventing people from finding out about flash sales in time to respond or they may not find out at all. Even if the Deaf-Blind receive the information in time, they may not be able to get to the retail store on their own or communicate with retail store staff independently. They also may not be able to use alternative methods of communicating such as through phone or relay systems. This would also be true and applicable for the Deaf and Hard of hearing. The number of days allocated for this grace period should be the same as stated in the Wireless Code, **30 days**.

9. In most parts of Canada, services for the Deaf-Blind, such as Intervenors or SSPs, that allow the Deaf-Blind access to communication and mobility, are very limited and must be scheduled well in advance. The combination of some or all of these factors can result in it being impossible for many who are Deaf-Blind to take advantage of flash sales the way the general public can. The Deaf-Blind have the same rights as everyone else to be included in flash sales and special offers.

10. One recommendation for accommodation that would allow the Deaf-Blind to be included in flash sales would be to provide an extended grace period. This would accommodate the Deaf-Blind who are delayed in receiving information, allowing them to have the time to line up the various accessibility and accommodations that they need in order to take advantage of the flash sales. Another accommodation would be to cover reasonable costs for the Deaf-Blind to book an Intervenor or SSP in order to travel to and from the retail store, facilitate communication and provide other environmental visual and auditory information as needed. If preferred, the Intervenor or SSP could be covered to facilitate communication between the Deaf-Blind and retail personnel on the telephone.

11. There is also great need for retail staff to receive accessibility training that provides them with better insight and understanding of the unique challenges and needs of Deaf-Blind customers. This would lead to staff having a better comfort level and understanding of ways to accommodate Deaf-Blind customers.

IV. CLARIFICATION ON UNDERTAKING

13. A Commissioner asked DWCC et al. at the October 22, 2018 public hearing to provide answers to whether an Accessibility Plan was ever cut out of an existing customer's account. The [Undertaking](#) explains that the majority could not answer this question, primarily because the Accessibility Plans were not even a year old. Since the normal duration of a wireless contract is two years, it is actually impractical to answer the question of if something less than a year old (the accessibility plan) ever outlasted or not a two year term (the wireless contract).

14. DWCC et al. thereby cautions against drawing conclusions from the two survey responses who reported they did not have their "the less than one year old" accessibility plans removed from their two-year contracts.

15. DWCC et al. may better be able to respond in two years' time, and by then, the CCTS should also have a good measurement of such recorded complaints. Perhaps in three years' time for a Review of this sales practice code, CRTC will have its answer.

16. Additionally, this is a very good rationale thereby proving CCTS must begin to track data related to accessibility issues, especially the Accessibility Plan so that CRTC can easily answer its own question along these lines.

V. FOLLOW UP COMMENTS TO PRESENTATION AT PUBLIC HEARING

17. The first bullet of paragraph 4 of CRTC TNC 2018-246 reads as follows:

*whether the large telecommunications carriers offer their telecommunications services for sale by engaging, either through their employees or third parties, in misleading or aggressive sales practices, such as providing consumers with incomplete, unclear, or misleading information regarding service terms and conditions or **selling them telecommunications services that are unsuitable for them, and, if so, the prevalence of those practices;***

18. DWCC et al. wishes to focus on "*selling telecom services that are unsuitable for them*"

19. Telecom companies appear to be "Inventing rules" (or excuses) for not allowing the "Accessibility Plan, as described by one of the panel presenters at the public hearing, there have been different excuses sales staff have given our Deaf, Deaf-Blind and hard of hearing customers for not allowing an Accessibility Plan:

- a. New phone plan, pre-paid or post-paid cannot have an Accessibility Plan - false
- b. New phone, therefore cannot have an Accessibility Plan - false
- c. Pay in full for a phone first before having an Accessibility Plan- false
- d. Existing Pre-paid plan therefore cannot have Accessibility Plan - false
- e. Existing Post-paid plans only can have Accessibility Plan - false

20. The only requirement is to be a member of an accessibility group organization; no other rules are conditional for the Accessibility Plan. For example, a Deaf member of the Canadian Association of the Deaf-Association des Sourds du Canada (CAD-ASC) would qualify for an Accessibility Plan. There is no reason that a sales agent should be saying "no, you can't," or refusing the accessibility plan, or saying that it is not available, when it exists.

21. Therefore, solutions DWCC et al. propose are:

Unbundle Options

22. Simply due to an inability to hear, DDBHH Canadians cannot use any of the following (all of which are sold to all Canadians):

1. Voice plans
2. Conference Calling
3. Call Waiting
4. Family Calling long distance
5. Evening & Weekend (6PM-7AM) discounts

23. The five services above are bundled and sold to all Canadians. These five must be unbundled for DDBHH consumers - in other words become optional for DDBHH consumers to choose from and buy either individually or in bundles.

Voice minutes vs voice plans

24. In the past, all Canadian wireless consumers paid an estimated 45 cents per minute (AKA “voice minutes”). At that time, DDBHH wireless consumers spent at most ten dollars a year for the little voice calling that they used (especially when texting with 9-1-1 - something that requires voice minutes to work).

25. The wireless landscape changed dramatically so that voice minutes were abandoned in favor of voice plans - something wireless companies forced everybody to subscribe to. Instead of spending up to ten dollars a year in the past, the same DDBHH consumers were now spending at least \$300 a year (assuming the voice plans cost about \$30 per month after taxes).

26. Going from voice minutes to voice plans offered no additional benefits to DDBHH Canadians and that in itself means voice plans are actually telecommunications services that are unsuitable for DDBHH consumers and should rather be an unbundled option rather than direct profit to the phone companies and thus ripping our accessibility group off.

27. DDBHH consumers must be given the choice between **voice minutes** (ex: pay 45 cents per minute only IF and when used) and **voice plans**.

28. Another alternative is acknowledging the voice is there but ensuring that the DDBHH is not paying for the voice service because we can not hear and therefore, we cannot use the voice. These DDBHH consumers must have the decision-making power and not the sales agent.

Advanced Voice Mail

29. Advanced Voicemail is a feature that places a copy of voicemail messages in customer’s text or email inbox. This service is ideal for those who often work from home, travel on business or is computer centric. In other words, this “advanced” service is where voice mail is transcribed to text, which is considered a **form of accessibility**, should actually be offered free of charge for those from accessibility groups because they are text versions of what they cannot hear.

30. An accessibility plan should not be like a “discount” so if there is a special deal, such as the Christmas 2017 debacle with the special deal(s) then the company is thinking it is a “discount on top of a discount” when it should be treated as an accommodation for the lack of access of such plans. In this way, the Accessibility Plans are not a success, and it would benefit the DDBHH consumer to have:

- a. **Clear and reasonable accommodating 3 price package options** for Deaf, Deaf-Blind and Hard of hearing Canadians, as recommended in DWCC et al’s TNC 2018-98 submissions such as:
 - i. 10GB for \$40.00
 - ii. 15GB for \$55.00
 - iii. 20GB for \$70.00

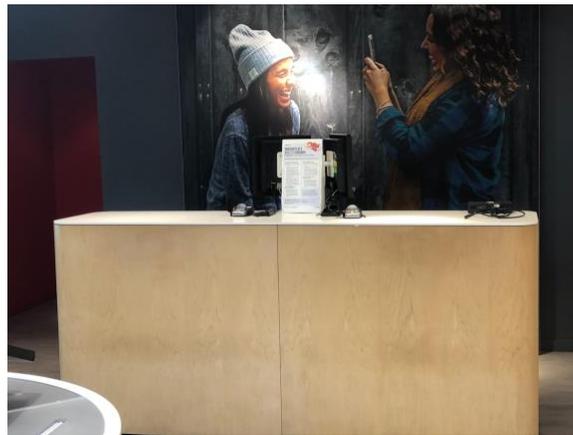
Retail Store Experiences

31. DWCC et al. would like to point out from the transcript below that references our concerns that telecom retail stores and in our view this telecom company is declaring it will not be accessible and therefore the rights and responsibilities would not be protected for DDBHH customers:

7398 COMMISSIONER LAIZNER: And what do you think about the request they've made that at point of sales or retail stores there be tablets with information dedicated to their needs either through tablet or through a video?

7399 MS. BARBER: So today in the Bell stores, you can access bell.ca, and if you're referring to the ASL -- the videos that were made for the Wireless Code, those are accessible in store because they're on bell.ca on the accessibility microsite.

32. During the hearing presentation, DWWC et al described the experience where DDBHH customers who walk into the telecom retail stores where full information is not provided. where the full information is not being provided. As you can see in the photo, there are no tablets that show the ASL and LSQ videos of the Wireless Code at the retail front desk, while the point of sale computer has the Wireless Code information in print format beside the terminal in English and French available, there is no equivalent information in the alternative format of ASL and LSQ as prescribed by the Wireless Code (2017-200).



33. Once ASL and LSQ videos are displayed on the retail store front desk, this will safeguard their rights and responsibilities as DDBHH customers to see the Wireless Code in the ASL and LSQ videos at the customer front desks like other Canadians who are seen the print copy of the Wireless Code as well too.

34. In addition, DWCC et al. are concerned that DDBHH customers are being displayed in a paper contracts by sale agents without having seen the wireless terminology videos in ASL and LSQ because 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.

35. For this reason, DWCC et al. recommends that ASL and LSQ video for wireless terminologies must be displayed at the designated customer service areas so that DDBHH customers have a right to watch ASL and LSQ videos before making a purchase. This also will safeguard their rights and responsibilities to understand the wireless contract as DDBHH customers to see the wireless terminologies videos in ASL and LSQ like other Canadians who read the print copy of the wireless contract.

36. Additionally, DWCC et al. reminds CRTC and the telecoms about the recommendation of 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 these staff are unavailable.

VI. RESPONSES TO STATEMENTS DURING PUBLIC ORAL HEARING PROCEEDING

37. DWCC et al. would like to clarify about slides during our [presentation](#) - the dedicated email address for Telus Accessibility plan was only used as **an example** of what it should be, only as a suggestion since, for example, **such an address does not exist yet**. The same goes for the simplified Rogers website address so a one-page printable description of the Accessibility Plan is available to show the sales agent, an example such as www.rogers.com/accessibilityplan. These were only used as examples and by no means does it mean these email addresses or website pages actually exist.

38. DWCC et al. would like to re-emphasize that its members and DDBHH customers are most often **not** offered a la carte options (options you can get standalone while unbundled) described in the Commissioner’s line of questioning as opposed to bundles. DDBHH customers from our accessibility group often get stuck with bundles of features that they are not using because of the “smack dab” shortened and limited (writing back and forth) communication happening with the sales agents. This is emphasized with reference to the survey report where 81 percent of respondents used “writing and back forth” as their primary mode of communication, which is a concern as it leads to potential misleading sale practices, if and when such miscommunication occurred.

39. The a la carte options need to be split into 3 categories as follows:

1) data 2) text 3) voice. And DDBHH Canadians can pick from these just like what is currently available with AT&T as seen below:

Smartphone Accessibility plans			
Monthly charge	\$45	\$55	\$75
Data	2GB	5GB	Unlimited
Approximate FaceTime / video calling time ²	6 hours	15 hours	Unlimited
AT&T Messaging	Unlimited	Unlimited	Unlimited
Overage charge	\$10 per 1GB	\$10 per 1GB	n/a
Voice calls	Unlimited	Unlimited	Unlimited

Basic feature phone Accessibility plans ¹			
Monthly charge	\$29.99	\$34.99	\$40
AT&T Messages	5,000	5,000	Unlimited
Data	Unlimited	Unlimited	Unlimited
Mobile-to-Mobile AT&T Messaging	Included	Included	Unlimited
Voice calls	\$0.40 per minute	\$0.40 per minute	\$0.40 per minute

40. DWCC et al. has been proposing the simplified options, using AT&T as an example, as a recommended solution since its participation in 2015-134, 2016-293, 2018-98. While DWCC et al. supports the unlimited SRV Canada VRS access, as a beneficial solution, it is restrictive to only one specific video application. Of course, and needless to say, DDBHH Canadians want equal access to video calling just as their hearing counterparts easily access their voice calls.

41. DWCC et al. appreciates that two companies offer the unlimited access to SRV Canada VRS as part of their current Accessibility Plans, which actually should be standard practice across the board; however, DWCC et al. still would like to emphasize that the current Plan does not recompense for the additional video applications such as FaceTime, Facebook Messenger,

Skype, Glide (please refer to DWCC et al's survey analysis report for [TNC 2018-98](#).) in the specialized accessibility packages.

42. The current wireless telecom consensus discounted \$20.00 solution, is still not effective, as it does not fit as mentioned on the presentation panel, as a "one-size-fits-all," for the data heavy consumer using it primarily for video calls. A simple 3 Accessibility Plan pricing scheme is a better fit with a la carte options. In this way, DDBHH customer (primarily for video calls) is not being victimized by "small" Accessibility Plan rebates.

43. Rogers, Telus and Bell simply need to make the steps for obtaining sales and accessibility plans easier and clearer, and less confusing just as what DDBHH Americans see in the States. Let's use a common scenario in the States:

- 1) Deaf customer wishes to buy a new smartphone.
- 2) First step is to notify AT&T Accessibility via Video Calling to let them know that Deaf customer plans to buy new smartphone, ie. iPhone.
- 3) AT&T Accessibility agent informed deaf customers to go into a store and enroll with a regular plan.
- 4) Deaf customer leaves the store with a smartphone purchase.
- 5) Deaf customer immediately goes home and follows up with AT&T Accessibility department directly advising of the purchased transaction and new smartphone purchase.
- 6) AT&T Accessibility department replaces the regular plan with an Accessibility Plan.
- 7) Within a day or two, the confirmation of the switch to specialized Accessibility Plan appears on the Deaf customer's online account.

44. The step by step for the Accessibility Plan needs to be outlined clearly and publicized in English, French, ASL and LSQ and on the telecom company websites.

45. This is why the Accessibility departments with dedicated e-mail addresses and direct phone numbers are critical for tracking the account changes and using CRM platforms to track such transactions among the Accessibility department teams. In addition, telecom company must employ DDBHH individuals in Accessibility departments that will be able to work with DDBHH customers and other general customers such as people with disabilities.

46. This is where the 3 proposed Accessibility Plan packages that DWCC proposed in [TNC 2018-98](#) comes in as the best solution so there are 3 data plan options that fit the qualified customer's needs.

Store Experience

47. DWCC et al. is pleased with the general comments made by the companies where they say it is possible and therefore not impossible to set up tablets or devices including computers with video playback of the ASL and LSQ videos of information describing the Wireless Code and contract terminology. We agree! The devices are already in the store. Technology already there in the store to use.

3571 MS. PRUDHAM: It was -- actually, we were obviously monitoring the proceeding on Monday and listening very carefully to what was being said. And there was a wonderful suggestion that came from a question actually. It was asked by one of the Commissioners and what would make things better. And one of the panellists responded and said, "Well, if you had the videos in the store on an iPad" and we just happened to be setting up our stores literally at this precise moment and we also looked at each other and went, "Well, of course".

3572 So we admit it won't actually be on an iPad, it will be on a computer but it only took a couple of minutes.

3573 COMMISSIONER LAFONTAINE: Not complicated and not very expensive.

3574 MS. PRUDHAM: No.

48. DWCC et al. was gobsmacked that there was no reference made at the public hearing to how video calls are important to our accessibility group meaning increased data packages are critical for DDBHH customers more so than for their hearing counterparts. Sales agents and telecom companies don't seem to "get it," even with the policy describing this in TRP 2016-496. More data for less, and there should not be disputes in the store or with the sales agent on this concept.

49. DWCC et al. emphasizes once again that there is still widespread unawareness of such accessibility plans by sales staff and the solution is to get accessibility departments more reachable and post knowledgeable staff at centralized flagship stores. Ongoing training with consultation of DDBHH groups will help increase awareness and less haggling at the stores.

VII. OUR RECOMMENDATIONS

50. DWCC et al. re-lists its recommendations as follows:

Accessible Plans

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

Retail Store Experience

- d. Establish and designate *Accessible Centre of Excellence* telecom company flagship stores.
- e. Employ DDBHH people with ASL and LSQ fluency into the company stores.
- f. Where the option listed above is not feasible, sign language services are provided with advance request.
- g. Provide in-store tablets such as iPads that play the ASL and LSQ videos

Retail Staff training

- h. Mandatory staff training on accessible company services and products.
- i. Orienting staff on iPads that will have ASL and LSQ video playback.

Online Sales Resources

- j. Promote the Accessibility Plans, on single-page web page for ease of print-out.

k. 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

l. Designated Accessibility Department phone numbers and e-mail addresses.

m. 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.

CCTS

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

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

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

CRTC

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

r. Create a Telecommunications Accessibility Fund.

CWTA

s. 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

t. Produce ASL and LSQ vlog to be shared across Canada with information about providing organization, or association members with proof of membership for the benefit of qualifying for Accessibility Plans.

VIII. TELECOM SALES PRACTICE CODE RECOMMENDATIONS

51. If this proceeding results in something akin to a Telecom Sales Practice Code, it must clearly and concisely protect the interests of customers from accessibility groups such as DDBHH Canadians.

52. CCTS needs to assist in ensuring the telecoms are accountable by tracking customer issues with accessibility or Accessibility Plan issues with the telecommunication companies.

53. Enforcement measures need to be put in place for violators or non-compliance of such Code for any actions related to accessibility. If sales and / or technical support staff meddle in accessibility issues, there must be a clear and simplified and effective mechanism to report such actions. Detailed descriptions (step by step instructions) of such mechanism(s) need to be made available in ASL and

LSQ.

IX. REMINDER: UNITED NATIONS CONVENTION ON THE RIGHTS OF PERSONS WITH DISABILITIES & ASL/LSQ RECOGNITION

54. DWCC et al. would like to once again remind that Canada ratified the [United Nations Convention on the Rights of Persons with Disabilities \(CRPD\)](#) in 2010, whereas the Convention ensures the right to accessibility to information and communications in its Article 9. State parties should take appropriate measures to ensure to persons with disabilities and DDBHH people to have access on an equal basis with other Canadians with information and communications technologies.

55. This includes provisions of information and communication as a part of true accessibility for DDBHH Canadians as a human right, when received on the equal basis especially during sales practices. It is critical when it comes to the process of purchase of provisions for their accessibility needs. One example of this true accessibility is to include Sign language interpretation services or having Deaf sale agents at the retail stores to ensure that communication is provided to DDBHH Canadians before making an independent decision.

56. Our joint group is working on the ultimate goal to ensure that there is an amendment in the current Bill C-81: Accessible Canada Act (ACA) where ASL and LSQ will be recognized as official languages of Deaf people in Canada. The biggest rationale is that such action will deliver the definition of accessible communication and recognize and preserve the linguistic identity of Deaf individuals as integral to full and equal participation in both Canadian English and French societies.

X. ACCESSIBILITY DURING PUBLIC HEARING

57. DWCC et al. reviewed the transcripts as seen in Part VI above, and we were both pleased and disheartened at the same time to see that comments were made about our group participating in the public oral hearing each day throughout the week.

58. DWCC et al. appreciates that the CRTC strategically had our accessibility panel at the beginning of the week, so that the Commissioners could query all the other parties and companies about our testimony, with our common scenarios and experiences with sales experiences regarding accessibility plans and services. DWCC et al would like to see this strategy at all future public hearings, so the telecom companies can have an opportunity to respond for CRTC's greater understanding.

59. However on a tangent completely separate from this proceeding, to be honest, the experience of reading these transcripts is akin to feeling like a group of people talking about us without us being in the room. DWCC et al. were non-participants for the rest of the week, simply because there was no sign language interpreter provisions for the rest of the week so our participating intervening group could observe in real time how the other parties and telecoms are responding to the Commissioner's queries. For us to receive the information in real time is ideal and equivalent. The non-provision of sign language interpretation for the rest of the proceeding is unjust and not equal.

60. Again on a tangent completely separate from this proceeding, DWCC et al. is a group of Canadians that face inequalities on a daily basis, and it advocates for the more, better and accessible telecommunications experience for our DDBHH Canadian constituents. It is truly exhausting to have to yet face another barrier to participate in a public federal government process open to the greater public where the DDBHH cannot through no fault of their own participate at par with their hearing peers. It is a sad reality that CRTC continues to reinforce

and enable the concept and the idea that these public hearings are only for those who can hear. In other words, “public hearings are for audio-speaking abled (hearing) people only.”

XI. CONCLUSION

61. DWCC et al. views it is critical that accessibility issues come to the forefront of such a critical investigation into telecommunication sales and service provisions on the following topics: telecom retail stores, specialized accessibility plans, staff training, online resources, accessible services such as sign language interpreting and ASL & LSQ videos and clear CCTS complaint process.

62. 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 telecom sales and service provisions. Our accessibility group does not want to see any further experiences of DDBHH Canadians with misleading, aggressive or inappropriate handling of the sales of telecommunications services to these members.

63. DWCC et al. thanks CRTC for inviting it to participate in the TNC 2018-246 proceeding. As always, please feel free to contact any of the undersigned should you have any questions.

Sincerely yours,

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

Frank Folino, President
Canadian Association of the Deaf-
Association des Sourds du Canada
ffolino@cad.ca

Megan McHugh, President
Canadian National Society of the Deaf-Blind
mchugh.mm@gmail.com

Elliott Richman, Executive Director
Deafness Access Advocacy Nova Scotia
daans@ns.sympatico.ca

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