



**Canadian National Society of the Deaf-Blind  
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Mr. Claude Doucet  
Secretary-General  
Canadian Radio-telecommunications and  
Telecommunications Commission (CRTC)  
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Call for comments – Accessibility - mobile wireless service plans that meet the needs of  
Canadians with various disabilities, Telecom Notice of Consultation **CRTC 2020-178 - Final  
Reply to CRTC RFI.**

Dear Secretary-General,

**Responding to CRTC TNC 2020-178 RFI December 10, 2021 replies:**

1. The Canadian National Society of the Deaf-Blind, Inc. (**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 for Deaf-Blind persons, promote public awareness of Deaf-Blind issues and gather and distribute information that will help people who are Deaf-Blind to become full members of society.
2. Previously, the CNSDB has been a fully- involved member of the DWCC et al. collaborative team, including the CAD-ASC, on this and other proceedings related to wireless communications issues. We maintain our joint connections but have recognized that as Deaf-Blind individuals, CNSDB team members have faced challenges and cannot fully participate as they wish.
3. We have pointed to the ongoing challenges of the Covid-19 Pandemic, now nearing its third year and fourth or fifth wave, as the main reason for this situation. Due to this health and social disruption, the Deaf-Blind community members have faced numerous barriers, including severe isolation from being unable to safely travel on public transit, meet and communicate in person, and safely social-distance in the community.
4. They have limited access to goods and services, experience difficulty in using remote communication methods due to lack of accessibility and more issues. These situations result in Deaf-Blind persons being cut off from social support more drastically than those who are not Deaf-Blind.
5. As the main Deaf-Blind person involved in the CRTC TNC 2020-178, President Megan McHugh's challenges related to worsening vision and hearing have meant coping with everyday tasks in different and frustrating new ways. These circumstances involve not

always having support personnel like intervenors attend and provide assistance in learning modern technology - including how to navigate their wireless devices and computer equipment with their further limitations. Because of this situation, CNSDB will be replying to the responses of the RFI in a limited way, knowing that the other collaborator organizations in DWCC et al. have more resources to complete the responses.

## **Deaf and Deaf-Blind Consultations**

6. CNSDB would like to note that in terms of accessibility, Deaf-Blind consumers are frequently "erased out of the picture" – often unconsciously, but with the same results – their unique communication and way-finding needs and situations being overlooked and not addressed. This treatment applies to consultative meetings by the wireless service provider companies. We have been informed that these companies may have separated and categorized the arrangements by disability, i.e., one session for blind consumers and a separate forum for Deaf and Hard-of-Hearing consumers.
7. Let us emphasize that CNSDB members belong to the Deaf and Hard of Hearing community AND the blind community. In consultations about accessibility, they may often identify with the Deaf and Hard of Hearing community. This group has a greater mutual understanding, especially regarding telecommunication accessibility.
8. That being said, the reality is that the Deaf-Blind community, as with the Deaf community, encompasses a variety of individual abilities. Since birth, some may have been deaf and blind, aligning more with the Deaf signing community, using visual and tactile communication. Others may have had "full" hearing at birth, becoming deaf or deafened later in life, their first language is spoken. Vision limitations can come at any time.
9. Please recognize that persons who are Deaf, Deaf-Blind, Hard of Hearing, or Hard of Hearing with visual impairments communicate in diverse ways. Some individuals will use sign languages such as ASL, LSQ, and Indigenous Sign Languages. Communication may be visual or tactile, with or without accompanying auditory clues.
10. CNSDB hopes to share this understanding of where its consumers "fit" in Canada's telecommunications world with this clarification. We request that consultations with consumers be diversified, inclusive, and accessible. The attendees will identify themselves and their accessibility needs as they see fit. CRTC and CWTA will be mindful of the Accessible Canada Act in ensuring this happens.
11. CNSDB aligns with DWCC and CAD-ASC in its submitted documents, specifically its Reply to the CRTC RFI. However, specific points need to be highlighted or addressed in light of Deaf-Blind experiences. CNSDB will make further comments, either generally or specifically, to specific RFI questions. CNSDB appreciates the opportunity to put forward its views in CRTC 2020-178.

## **RESPONSE TO RFI QUESTION #1.**

### **Verification of Disability**

12. CNSDB would like to address specific points that have been raised in the responses related to how consumers can have their disabilities verified. The issue of potential abuse will be dealt with further down this document.
13. Our Deaf-Blind community members are well aware that the system has been established for a long time where a medical "proof of" disability has been the norm. The well-known "CNIB Card" is one - where a person would need to have a letter from a medical doctor or eye specialist to be registered with the CNIB. This registration enables clients to receive services and the CNIB National Identity Card, enabling urban residents to travel on their municipal public transportation, among other benefits. Unfortunately, many Deaf-Blind and Deaf with limited vision live in areas with no CNIB service centres, so they may not have access to services or benefits as above.
14. CNSDB noted that certain wireless service providers were more flexible in their suggested manner of verification, including recognizing membership in disability organizations by presenting a membership card. However, it was disturbing to read that Videotron's list of approved "certificates" had a medical-rehabilitative approach, not considering other options. The Disability Tax Credit information suggested as an option is viewed by the community as invasive due to personal information that has no business being shared with private companies. It is bound to Privacy Act violations.
15. The CNSDB accepts and supports the position taken by the CAD-ASC and DWCC in their answer on page 2 of their December 10 Response in 13: "...is to empower the Deaf, Deaf-Blind and Hard of Hearing person's choices in self-identification. All options that are available to them must be listed on the wireless service provider websites."
16. These verification options must be presented so that the Deaf-Blind or hard-of-hearing person with low vision can choose what works for them and their unique situation.

### **Potential Abuse of Accessibility Plans**

17. The WSPs and the CWTA strongly emphasize that the process of verification of disability prevents unauthorized people from claiming special rates and services. Among other companies and the CWTA, Videotron has expressed concern about the potential and significant risk of abuse regarding verification.
18. CNSDB and other consumer groups do not know the statistics for the attempts and fraudulent claims to the accessibility plan. Without this information, the argument for the "significant risk of abuse" has no value. CNSDB wishes to know if the companies have any proof or data that shows the number of attempts able-bodied or hearing people have tried to claim the special rate or discount?

19. CNSDB's view is that the CRTC should make it a requirement for the companies to track and report these claims and make this information public. Otherwise, it is only speculation and leaves doubt or suspicion, and that alone is not strong enough of a case.
20. While DWCC et al. responded to this in Question 6, in paragraphs 13 to 15, on Page 1-2, CNSDB will comment on it here concerning the topic. CNSDB notes that the companies claim to keep statistical information confidential according to several sections in the Telecommunication Act and some other CRTC policies.
21. CNSDB recalls being part of DWCC et al. as the collaborative group that participated in a proceeding examining text-based relay services, TNC CRTC 2017-33, and uncovering international statistical records of reporting from other countries such as Australia and the United States. CNSDB saw this as beneficial information for consumer groups to access and participate more fully in public policy processes.
22. CNSDB remembers that the resulting policy (CRTC 2018-466) obligated the companies to report accordingly. With this in mind, CNSDB again agrees that such reporting needs to further evidence the companies' concerns.
23. CNSDB is in alignment and supports DWCC et al.'s comment that according to the Accessible Canada Act, the companies should be reporting accessibility plan numbers annually. And with this, the CRTC needs to make available, at the minimum, the generic WSP accessibility plan statistics annually as follows:
  - Total numbers of inquiries about the accessibility plans
  - Total number of accessibility plans per WSP
  - Comparative analysis for province and territory
  - Categorized statistics of those who self-identified as Blind, Deaf, Deaf-Blind, or Hard of hearing, late-deafened, and other categories of disabilities
  - Most common verification identification
  - Total number of denials or refusals of the accessibility plan
24. Moving on from eligibility for wireless accessibility plans, we will see the economic and technological challenges that Deaf, Deaf-Blind, and Hard-of-Hearing consumers face when planning for their communication requirements.

## **RESPONSE TO RFI QUESTION #2.**

**The wireless service providers and CWTA regarding undue disadvantage by Deaf, Deaf-Blind, and Hard of Hearing persons and persons with disabilities have missed certain aspects of real-life experiences affected by barriers, economy, and technical issues.**

25. As mentioned on page 3, CNSDB aligns with DWCC and CAD-ASC in its submitted documents related to Question 2 specifically and other questions where barriers and undue disadvantage are considered.

26. We again reference the Public Interest Advocacy Centre's report "No Consumer Left Behind: A Canadian Affordability Framework For Communications Services In A Digital Age" and the CNIB's 2018 Survey indicating the economic and employment status of persons with disabilities and specifically blind Canadians where 28% were reported as being employed.
27. National statistics for DeafBlind persons have not been updated since the 2005 [Study of Deaf-Blind Demographics and Services in Canada](#) by the Canadian National Society of the Deaf-Blind and Canadian DeafBlind Association. Since that original survey, current numbers, economic status, and employment rates have not been updated.
28. However, it is widely held that the unemployment of Deaf Canadians is high, as described in their position paper "[Employment and Employability](#)" by the Canadian Association of the Deaf-Association des Sourds du Canada (CAD-ASC). "In 2014-15, once again, we conducted a formal survey of 365 Deaf Canadians, under the supervision of the retired Chief Statistician of Statistics Canada. This time the number of unemployed Deaf Canadians was 40%, increasing 2% since 1998. All of the remaining 60% were either self-employed or short-term contract workers, 24% of them part-time."
29. Deaf-Blind Canadians have significant economic challenges, including low income, if employed or on disability benefits with severe limitations in cost-of-living and extraordinary expenses. For example, communication is a necessity, especially in today's world. A Deaf-Blind person who relies on Braille to read and write online or by wireless networks would need to have special equipment to use their computer or smartphone. Here is one example:
30. One person in British Columbia currently has two portable electronic Braille displays. One is used with a computer with a screen reader app and the smaller with a cellphone for text messages. These displays cost between \$2,000 to \$5,000, not covering future repairs or replacements. This expense is in addition to their mobile monthly plan, which is discounted only 10%.<sup>1</sup>
31. If this DeafBlind person is on the British Columbia (BC) Disability Benefits, they get just \$983.50 support funding per month and may receive \$375 for shelter (rent)<sup>2</sup>. It would be \$672 for a single person on Ontario Disability Support Program, with a shelter allowance of \$497 per month.<sup>3</sup>

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<sup>1</sup> Personal Communication, Eddy Morten, January 16, 2022.

<sup>2</sup> Province of British Columbia. BCEA Policy & Procedure Manual. Disability Assistance Rate Table. [Link](#)

<sup>3</sup> Province of Ontario. Ontario Disability Support Program - Income Support. [Link](#).

32. See this example of financial challenges a DeafBlind person from Toronto may face. A Rogers representative told a female consumer that they would only receive the accessibility discount on plans over a certain dollar amount. This plan had to be from \$80-\$85 monthly, and they have to be in-market plans.<sup>4</sup> This cost is a sizable percentage of the monthly budget for a person with a disability, even if employed.
33. It has been reported that the Provinces of Alberta and Ontario had equipment support programs and that before the last Winter Olympic Games, British Columbia had a short-lived program. CNSDB believes there should be a national and provincial partnership where specialized equipment for Deaf-Blind could be distributed, similar to what other countries have, such as the United States:
  - **National Deaf-Blind Equipment Distribution Program in the USA (NDBEDP)**  
<https://www.fcc.gov/general/national-deaf-blind-equipment-distribution-program>
  - **State distribution routing - iCanConnect**  
<http://www.icanconnect.org/states>
34. CNSDB completes its comments on Question 2 and briefly touches on Question 3 before wrapping up its presentation.

### RESPONSE TO RFI QUESTION #3.

35. In response to Question 3, CNSDB supports the DWCC where they state they agree with the CNIB, which has also referenced specific applications that blind and low-vision consumers want that use high amounts of data and are equivalent to the high-use-data apps that Deaf, Deaf-Blind, and Hard of Hearing people need for their daily needs.
36. Regarding throttling, DWCC et al. included information on other communication or guided-assistance apps suited for Blind and Deaf-Blind that should be considered, as recognized in CRTC 2016-496: *iOS Voiceover*, *Google's TalkBack*, *Be My Eyes* and *AIRA*. It is evident that non-signing Blind persons also use high-use data apps.
37. CNSDB agrees with the DWCC et al. that "this further evidence that throttling and impeding these apps will impact Canadian persons with disabilities telecommunications using the wireless networks."
38. CNSDB supports the DWCC et al. closing in response to CRTC's RFI Question 3 (January 10): "In light of the *Accessible Canada Act*, the CRTC needs to ensure that these speed limits and pay-for higher-speed passes are removed for those identified through the accessibility plans, not just through the SRV Canada VRS app. Throttling must never take place where it impacts a Canadian with accessibility needs."
39. CNSDB completes its Reply to CRTC RFI Responses with General Comments and Responses in the next section.

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<sup>4</sup> Personal Communication, M. McHugh, January 16, 2022.

## **GENERAL COMMENTS and RESPONSES**

40. CNSDB endorses the recommendations made by CNIB and DWCC et al. related to accessible information on WSP websites and social media, such as how the data presented in graphics is managed and if the general appearance of the websites can be adapted to those with low vision, Deaf sign language users, and those who may have literacy challenges.

### **In their January 10, 2022 reply to Question 1, DWCC states:**

41. The examples below will show that telecommunication providers would benefit from closer collaboration with accessibility groups and experts with lived experience to make their information reach consumers more effectively and at a more significant benefit to both the companies and their customers.
42. The websites of Bell, Telus, Rogers, and Shaw are not "friendly" to those who have low vision or who are Deaf-Blind. There is no option to change the webpage view to high-contrast, for example - a dark background with white or yellow texts. The link for accessibility information page(s) is often tiny text at the bottom of the home page. This link needs to be placed higher on the arrival webpage of each of the wireless service provider sites to make it easier for those who need to find it on the landing webpage.
43. CNSDB adds that there should be another option to add on these websites, the choice of dark mode to give alternatives to websites with "bright white backgrounds" that might strain the eyes.
44. The organization supports the following comments made by CNIB on the accessibility of informative websites.

### **CNIB provided the following comments in its August 27, 2021 Intervention:**

45. "For Canadians who are blind or partially sighted, using and navigating a mobile phone company's website can be difficult. Website accessibility is not universal, especially among smaller providers. When websites fail to meet accessibility guidelines such as those provided by WC3, users will encounter unnecessary barriers if they attempt to navigate or manage their services."
46. "Telephone and in-store options present additional challenges, specifically around information and the ability to trial products. Discrepancies in information arise based on the platform in which prospective customers with disabilities choose to use."

## Closing Comments

47. In Summary, CNSDB emphasizes that there is no "one-size-fits-all" approach to providing accessibility in telecommunications for persons with disabilities, Deaf, Deaf-Blind, and Hard of Hearing individuals. This complexity mandates better collaboration among the Telecommunication industry, disability and DDBHH consumers, and the Commission, which regulates and will set accessibility standards as mandated by the Accessible Canada Act, to truly make Canada a progressive leader in Communication Equity.
48. CNSDB appreciates the Commission's consideration of its Response to other parties' replies to the CRTC RFI questions. and looks forward to the policy outcome of this proceeding.
49. CNSDB expresses its gratitude to the Commission and other participating parties for its support to allow CNSDB to participate and present Deaf-Blind experiences and perspectives with wireless accessibility in this final stage.
50. Should you have any questions, please do not hesitate to contact the CNSDB, and members will be glad to respond for further clarifications.

Regards,

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