

## DWCC et al. Response to Q7 Zero Rating of VRS

This document from DWCC et al. focuses on the Zero Rating of VRS coming from CRTC's RFI Question 7.

1. First off, DWCC et al. acknowledge that this query was only for those service providers who currently do not zero-rate VRS. These companies are SaskTel, Quebecor/Videotron, possibly Shaw, and other smaller providers. We wish to make comments about crucial issues and responses by the WSPs.
2. As shown in the DWCC et al.'s intervention submitted on August 27, 2021, Table 1, only six companies had unmetered data access to Canada's VRS. The interveners believe that for accessibility, there needs to be mandated access to Canada's VRS without being counted toward data.
3. DWCC et al. remind all that this by definition essentially means *unmetered or uncounted data usage* while using the VRS application. The companies currently meter our data usage by limiting data per month. For accessibility, DWCC et al. would like no limits of using data while using VRS, which is uncounted or "unmetered access that does not affect speed. Our consumer group re-affirms the importance of moving away from the wording "Zero-rating" and shifting the focus to the wording the carriers have switched to using - ***unlimited built-in access to Canada's VRS application.***
4. Referencing one example from **Decision CRTC 2007-56<sup>1</sup> - Part II.** (subparagraph) **1(b)(iii) of the Policy Direction<sup>2</sup>**, which states that the Commission, when relying on regulation, should use measures that satisfy the following criteria, namely, those that, if they are not economic, to the greatest extent possible, **are implemented in a symmetrical and competitively neutral manner. [bold inserted]**
5. By the above definition, accessibility is a mandate of the CRTC. The carriers must make all forms of telecommunications possible, including unmetered high-speed access to *SRV Canada VRS*, for Deaf, Deaf-Blind and Hard of Hearing Canadians and other persons with disabilities.
6. While we read all the wireless service provider responses (Bell, Telus, Rogers), these companies confirm they have provided this unmetered access to data while using Canada's VRS app. It is noted that Shaw redacted their response, so DWCC et al. cannot comment.
7. However, due to Sasktel and Videotron commenting that they are not providing unmetered access to Video Relay Services, it is DWCC et al.'s position that CRTC needs to exercise its powers to ensure that all allow for this access to data for the use of the *SRV Canada VRS* services through its application on a wireless connection.

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<sup>1</sup> Telecom Decision CRTC 2007-56 - [link](#)

<sup>2</sup> Policy Direction 2006 - [link](#)

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8. All the carriers must make unmetered and unlimited data access to VRS possible through all designated accessibility plans or other ways. CRTC must ensure that there is no throttle either way.
9. The companies that specified they did not hinder 911 VRS calls include Telus, which stated sign language users who have reached their data limit will always call 9-1-1 using VRS without incurring additional charges. Bell Mobility, Virgin Plus, Lucky Mobile, Bell MTS and Rogers did not mention 911 VRS calling in their responses.
10. Video calling and VRS accessibility issues in wireless communication are the modern-day equivalents to implementing the TTY or Tele-Text access issues applied to telephone companies 35 and more years ago. Deaf and Hard of Hearing TTY users of telephone services successfully argued that for equal access to the network of all telephone users, the telecoms should establish message relay services and discounted long-distance rates in **cooperation with** the service providers.
11. Therefore, DWCC et al.'s position are that the wireless service providers who do not currently provide this access to Canada's VRS must offer unlimited and non-throttled data to Deaf, Deaf-Blind and Hard-of-Hearing Canadians. Suppose they cannot adapt their technology to provide unmetered access to the VRS, and it is not offered through the accessibility plan, i.e. the \$20.00 rebate, the companies must still submit a discounted rate until they can provide this type of access to *SRV Canada VRS*. This rate offer applies during a feasibility or trial study.
12. Historically, as seen in Question 5, wireless service provider companies have worked with community groups if they needed to do feasibility studies. If the practice were to continue, they could enlist DWCC et al. and the other consumer and accessibility groups to collaborate to ensure there is access to VRS services on their wireless networks.
13. In closing, DWCC et al. support the DHH Coalition and CDGM's comments that "it is not just the mobile VRS app that needs to be.." [unmetered] "...but also any video chat apps. To see DWCC et al.'s perspective of providing unmetered unlimited data for other video communications in general, other than VRS, please reference our response to Q4.

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