

### Disadvantages of this option

1. This option would require careful definition of what constitutes “profits”, and potentially would be subject to considerable disagreement of definitions by various TSPs.
2. The more profitable companies may complain that they are proportionately paying more than those which would have had a higher profit but they reinvested their income into facilities, research or development. It may be more difficult to achieve stakeholder consensus for this option.
3. This option could be more difficult to audit.
4. This option would require the establishment of a new separate VRS fund that would need to be managed, and to which the TSPs would need to support with revisions to their fiscal and accounting practices.

### **14.2.4. Interpreter training program expansion**

#### **14.2.4.1. No CRTC funds for interpreter training**

In this option, no CRTC mandated funds are used for interpreter training. Canadian ITPs would be required to respond to the need for expanded interpreter training based on their own funding sources, student demand and enrolment. Similarly, interpreting students would be required to fund their education in the same manner as they do presently.

### Advantages of this option

1. This option does not require establishing a new VRS interpreter training funding plan and managing its activities.
2. This option costs less by not providing additional VRS funds to colleges and universities.

### Disadvantages of this option

1. The ITPs are not financially provided an increase in revenue necessary to support the development of additional interpreters that will be necessary for VRS.
2. Without the necessary interpreters, VRS will not be able to meet the significant demand for service from VRS consumers.

#### **14.2.4.2. Interpreter training programs provide VRS**

In this option, the Canadian ITPs would be involved in the delivery of VRS, e.g., as functioning VRS call centers. They would receive payment from the VRS fund for their VRS calls, which they can use to expand their programs and/or to support their students.

### Advantages of this option

1. This option will provide VRS to consumers while simultaneously providing funds to ITPs for the development of their programs and students that is needed to support VRS.
2. This option will give ITPs, their directors, instructors, students and graduates with actual experience with VRS, so that all aspects of the ITPs benefit. For example: ITPs will develop firsthand knowledge of what the VRS interpreting challenges are, and how to address them in

their curricula; ITPs will need to develop video interpreter mentoring programs, and other creative facets of their VRS programs/services in order to ensure that video interpreter training is appropriate and the quality of service is sufficient.

3. ITPs can, from their own experience, become key participants in the development of national VRS program interpreter standards of competence for VRS that might be defined in CRTC regulation or contracts. For example, many stakeholders consider that simply graduation from an ITP does not guarantee that an individual may be professionally ready to interpret in a VRS setting.
4. On-campus VRS run by the ITPs will encourage quality students to stay with the program, and to not drop out to take community interpreting employment in the field.
5. The long term benefit of this option will be to expand and develop the ITPs resulting in a permanent and increasing number of interpreter graduates available for both community and VRS interpreting.

#### Disadvantages of this option

1. VRS calls will initially be handled by organizations that have no professional experience providing VRS.
2. ITPs may have little ability to handle typical non-VRS functions such as customer service or consumer technical support. These functions will need to be augmented by additional resources or will need to be provided by others. For example, the college information technology department or support staff may provide VRS technical support to the ITPs and potentially to VRS consumers.

#### ***14.2.4.3. Interpreter training is funded or offered by the VRS providers***

In this option the VRS providers would be required to sponsor or offer additional interpreter training. Such training may be either supplementary to interpreters who already have some level of expertise or experience and is in support of the unique requirements of VRS, or it may also offer a more basic level of interpreter training for people with little interpreting skills.<sup>54</sup>

#### Advantages of this option

1. This option does not require a separate funding mechanism and its consequential administrative overhead to support VRS interpreter training. The additional VRS interpreter training would be the responsibility of the VRS provider, not the VRS program in general or the ITPs.
2. VRS providers would be free to judge the additional level of training that they determine to be necessary in order to offer the VRS quality they deem appropriate for their customers.

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<sup>54</sup> For example, the largest U.S. VRS provider, Sorenson Communications, offers interpreter training to augment the skills of interpreters for use in VRS. It requires participants to sign a contract that obligates the participant to work for Sorenson and no other VRS provider. (As a standard employment practice, Sorenson requires exclusivity of all its interpreter employees with threatened consequences for non-adherence.)

#### Disadvantages of this option

1. Only the very largest VRS provider(s) would be able to afford to establish interpreter training programs, as they are not part of the current business practice of almost all existing VRS providers.
2. The requirement for VRS providers to offer additional interpreter training would not relieve the VRS program from interpreter training costs. It would only shift the costs to the VRS providers, who would need to include the cost within their VRS per minute or other form of reimbursement.
3. This option places the requirement for interpreter training on the business elements that typically have no, or very limited, expertise in interpreter training. They do not have the professional expertise and in-depth resources of the college and university ITPs.
4. The VRS providers are focused on profit, not interpreter training. They will only offer interpreter training to the extent that it will increase their profits resulting from their provisioning of services. They will not be intrinsically motivated to provide interpreter training at the highest quality standards of competence that many stakeholders may believe should be necessary for effective VRS.
5. VRS providers will not be capable of providing the long term development of interpreter training that is offered by college and university ITPs. At best they may only be able to provide augmentation of training to interpreters who already have attained a high level of competence through formal training and experience.

#### ***14.2.4.4. CRTC VRS funds support interpreter training programs***

In this option dedicated VRS funds mandated by the CRTC would be provided directly to the Canadian college and university ITPs for their expansion and development. This funding to these ITPs would be separate from funding to VRS providers.

#### Advantages of this option

1. This option would allow the ITPs to develop and expand their interpreter training programs for the short term and long term benefit of VRS consumers, regardless of whether an ITP may also elect to provide VRS.
2. The long term benefit of this option will be to expand and develop the ITPs resulting in increasing their capacity to graduate more students, who will become available for both community and VRS interpreting.

#### Disadvantages of this option

1. ITPs will not gain invaluable knowledge and experience as a result of also providing VRS.

#### *14.2.4.5. CRTC VRS funds support students of interpreting*

In this option dedicated VRS funds mandated by the CRTC would be provided directly to Canadian students enrolled in Canadian interpreter training programs in the form of grants or student loans.<sup>55</sup> Funds would not need to be paid back to the extent that they worked for a VRS provider located in Canada providing VRS to Canadians for a specified period.

##### Advantages of this option

1. Students will be financially supported and encouraged to learn interpreting, and to work in VRS.
2. As a result of the VRS student aid program, more students will enter ITPs, graduate, and work in VRS, thereby increasing the ability of VRS to meet consumer demand for service.

##### Disadvantages of this option

1. The money provided to students will be spent by the students on all forms of student expenses (housing, general tuition, food, entertainment, etcetera.) Very little of the funds will be used specifically to support the college and university ITPs, which will need funds to hire teachers, expand their facilities, develop curriculum, etcetera.
2. ITPs will not gain invaluable knowledge and experience as a result of also providing VRS.
3. Many interpreting students, who may have received VRS student aid, will never obtain the competency necessary for interpreting regardless of the training, are unsuited to become interpreters, or they leave the program because they realize interpreting is too difficult.
4. Rules for the student aid program would need to be established, including a requirement that the student loans or grants would not need to be paid back if the students graduate and work for a number of years for Canadian VRS organizations. Obtaining repayments for not graduating and working in VRS could be problematic.
5. If this option does not simply allocate a portion of VRS funding to existing student scholarship or loan programs, new similar programs will need to be set up and managed by the college and university ITPs, potentially at a significant administrative expense.
6. The development of this student aid program could generate political interest, either in support of or against the program, which would need to be responded to, and which may potentially put the VRS student aid program at risk. For example, an argument may be made that if there will be plenty of VRS interpreting jobs for graduates, a student aid program specifically for VRS is not necessary; that existing student aid programs can meet interpreting students' financial needs.

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<sup>55</sup> This option has been adopted by New Zealand VRS since 2008.

### 14.3. Recommendation

For funding the different VRS program elements, the recommendations are:

#### VRS consumer devices

- No special CRTC mandated funding or subsidies for consumer video devices.

This option matches the other MRS programs, preserves limited VRS funds, and avoids the significant expense, delays, administration, and potential fraud associated with a VRS equipment subsidization program. Advocacy groups should look for non-CRTC funds and programs to help with VRS consumer device costs.

#### Consumer broadband services

- No special CRTC mandated funding or subsidies for consumer network services.

This option matches the other MRS programs, preserves limited VRS funds, and avoids the significant expense, delays, administration, and potential fraud associated with a VRS broadband network subsidization program. Advocacy groups should look for non-CRTC funds and programs to help with broadband VRS access and usage costs.

#### VRS provider services, VRS platform, VRS consumer technical support, and VRS program administration

- Provide CRTC mandated funds as a percent of all TSP telecommunications operations revenue.

This option will probably be the most acceptable by all stakeholders: TSPs, the public, and politicians. This method of funding has previously been used by the CRTC. An initial funding mechanism and amount will need to be established for the development of the program during the first phase of implementation (prior to full deployment) to ensure the program has the financial resources to form and carry out its responsibilities, including the grant research recommended in sections 16.2.3 and 16.3.

#### Interpreter training program expansion

- As an initial stimulus to increase the capacity and capability of the college and university ITPs, provide a VRS grant program that requires both program expansion and offering of VRS as a service to consumers. After a time certain, such as three to six years, when the ITPs are self sustaining and robust enough to meet the training needs for interpreters, discontinue the grant program.

This recommendation is a blend of the two options that provide revenue to the ITPs. It assumes that the strongest way to enhance the ITPs and attract and keep students will be for the ITPs to provide VRS to consumers and for the ITPs to receive funds for instructor and curriculum development, and as deemed appropriate by the ITPs for potential scholarships to their students who demonstrate ability and financial need. Once the programs are developed and student

enrollments and graduations are high, the VRS funds can be reduced or discontinued. Depending upon the VRS model selected, the ITPs may elect to continue to provide VRS as an augmentation to their programs.

## 15. Acquisition

VRS provider services must be acquired and paid for. The question is: What is the best way to procure or acquire the services?

### 15.1. Desired Outcomes

The optimum desired outcomes for acquisition of VRS provider services should:

- Result in a combination of lowest costs and best services
- Be a fair acquisition methodology
- Provide contracts and services that are responsive to the needs of all parties

### 15.2. Options

The options under consideration are:

1. Acquire VRS as a CRTC regulated service based on a providers' allowed costs plus profit
2. Acquire VRS as a competitively bid, single vendor fixed rate service
3. Acquire VRS as a competitively bid, multi-vendor flexible rate service
4. Acquire VRS as a competitively bid, multi-vendor service at a pre-established rate

In addition to these options for VRS acquisition, it is assumed that other potential procurements will be necessary for other services, and these will be acquired using best procurement and contracting practices most suitable to the duration and type of service being acquired. For example program grants may have a different RFP process than solicitations for technical services. Many of these additional acquisitions will be dependent upon other aspects of the VRS model that are selected. For example, if it is determined that a single VRS platform is desired, it will probably be best if the platform is not owned by a VRS provider, but is owned or leased by the VRS program (such as by the third party administrator entity) and licensed for use by the VRS providers. Such licensing arrangements would have their own unique assignment and contract process.

#### 15.2.1. CRTC regulated, cost-plus

In this option the CRTC would establish VRS provider reimbursement rates based on the allowed costs submitted by VRS providers. Costs would be a weighted averaging of forecast and actual costs. The CRTC would need to define what costs are allowable and what percentage of profit is allowable. Providers would need to submit auditable cost data, which would remain confidential. Provider services