



BRITISH COLUMBIA VIDEO RELAY SERVICES COMMITTEE

c/o WIDHH
2125 W. 7th Avenue
Vancouver, BC V6K 1X9

www.bcvrs.ca

bcvrsc@gmail.com

@BCVRS

November 14, 2013

Re: FINAL SUBMISSION – CRTC Notice of Consultation 2013-155: *Issues related to the feasibility of establishing a Video Relay Service, File Numbers: 8665 – C12 – 201303536 and 8665-C12-200807943*

The BCVRS Committee thanks the CRTC for the opportunity to present at the Hearing for the Notice of Consultation 2013-155, in both Gatineau, Quebec, and from the Vancouver CRTC offices. Please find a summary of our position and final comments:

1. BCVRS is in support of the principle that Video Relay Services be funded by all **TSP's as well as all Internet Service Providers (ISP's)** who would contribute to a fund that pays for the Video Relay Services. The quote, "*Broadcasting distributors now deliver telephone service. Phone companies deliver television service. The Internet delivers everything and mobile devices bring it all into your hand wherever you are,*" given by Konrad von Finckenstein, Q.C. in a speech to the Standing Committee on Industry, Science and Technology, on April 13, 2010 in Ottawa, Ontario, supports the position that both TSP's and ISP's should be contributors to the *Video Relay Services* as the VRS would be provided primarily through the Internet. **Source:**
<http://www.crtc.gc.ca/eng/com200/2010/s100413.htm>
2. BCVRS was impressed with the **platform that nWise proposed** in their presentation, as a result, we are in favour of this platform being implemented based on several reasons. The inclusion of the Message Relay systems into the platform framework is crucial because several communities that we are concerned about need to be included. Deaf senior citizens, unfamiliar with new technology, are still using the TTY as a way to access relay services, as are Deaf-Blind citizens that rely on Braille enabled TTYS. We do not want to see VRS replace the MRS or IP-Relay systems, as these are still viable options for these specific groups. BCVRS also feels that Interoperability and having options is critical to the success of VRS in Canada. The proposed **nWise** platform best fits our position on VRS inclusion of existing Message Relay systems, choice and interoperability as stated in our presentation to the Commission. We do not want to see closed systems such as the one described by Sorenson quoted on transcript line item 4882 where they state that Sorenson is a closed system.
3. BCVRS would like to emphasize Mr. Howard's comments in lines 5943 and 5944 that **Skype or FaceTime are not a desirable means** to deliver Video Relay Services based on one members' direct experience with Skype used by an Australian VRS provider. According to Mr. Kershnik, transcript line item 4882, Skype and FaceTime are closed market applications (apps). According to a Mr. Phil Harper, of Australia Video Relay

Services, in their experience, Skype when used by the Australian VRS users is not productive or very user friendly; the user must add each interpreter's code into their list of contacts thereby adding an additional 6 Australian VRS interpreters onto their Skype list. In addition, the consumer must check which interpreter is available through a system of red and green dots, if it is all red dots; the consumer will have to "ping in" to let the interpreter know that s/he is waiting. In addition and the consumers don't have any way to know who is next in line and when their call will be answered.

4. There was ongoing discussion about the **point to point calls being used at a high rate as compared to the number of actual Video Relay Service calls**: The American experience of 70% point-to-point calls is *currently* similar to our experience with the Telus-Sorenson trial. It is our opinion that the reason for this high rate of point-to-point calls is, in the beginning when the American Video Relay Service industry was in its infancy, consumer education about VRS was provided and the number of actual Video Relay Services calls increased. We have learned from VRS users in the US that after a number of years, these workshops and educational opportunities for Deaf persons were discontinued, thus the proportion of point to point calls grew larger as additional new users subscribed to the services. BCVRS feels it is vital to provide and mandate:
 - a) On-going one-on-one or community group education sessions on the use of VRS, the different means of utilizing VRS, how to operate the equipment, launch the apps and to effectively use VRS features.
 - b) Instructional step-by-step videos in ASL or LSQ for consumers on how to set up, or "how-to-use" features.
 - c) Tech support available 24/7 in ASL/LSQ
 - d) Widely advertised VRS to both Deaf and hearing consumers to increase VRS usage to connect with the Deaf community. The key message should be VRS benefits EVERYONE, not just the Deaf persons.
5. In reference to Mission Consulting, Phase 12, page 43, 7. *Proposed Solution for Canadian VRS*, BCVRS supports its recommendation for assistance in funding **Interpreter Training Programs**, as this would enhance the specialized VRS interpreter pool and support the sustainability of the community interpreter pool. BCVRS recommends that it be mandated that VRS call centres be located in the same cities as the ITPs to facilitate training opportunities on-site. This will help develop a feedback loop in both directions, VRS issues, are learned at the VRS sites, can be rectified and taught through the ITPs, and vice versa.
6. During the Canadian Hearing Society and the Ontario Association of the Deaf's presentation on Monday October 21, at the Hearing for *Notice of Consultation 2013-155*, presenters for these groups discussed the use of American interpreters for Video Relay Services in Canada. It is BCVRS' position that **we should use the pool of the 200 existing Canadian interpreters already working for American VRS users**. We would like to see Canadians contributing to their own economy, providing a "Made in Canada" solution. Canada has a proven screening process that produces higher quality interpreters, therefore we recommend that any interpreters whether Canadian or American be qualified and members in Good Standing of the Association of Visual Language Interpreters of Canada, AVLIC. BCVRS would like to reference in our submission a proposed solution of hours gradually expanded in the beginning to accommodate the number of interpreters available in the initial phases of VRS deployment in Canada with the final and ultimate goal of 24/7 Video Relay Services.

7. It is our view, **Video Relay Services should not have to be arranged via appointment**, as mentioned by Ms. Moreland, line reference 944-945 in transcript, and BCVRS is in full agreement of this statement. For VRS to be considered a *functionally equivalent* telecommunications access, we need **ten-digit phone numbers to make calling a less cumbersome process, to encourage hearing people to call us**. In response to the wait time question posed during the Hearing, in the US, wait times were longer in the initial stages of VRS implementation but as the industry grew, the wait times were considerably less. As long as the person is notified and aware with a Hold system, “an interpreter will be with you,” message, is acceptable.
8. BCVRS would like to emphasize while the majority discussion during the Hearing was around having a **singular VRS service in Canada**, we agree in the initial phases, if necessary that is acceptable, but we would like to see opportunities for competing VRS companies to enter the market in within the next two years. BCVRS strongly believes that allowing competition is healthy and ensures quality of service.
9. **Bell’s proposed length of implementation** – initially, they proposed 5-year VRS deployment, but recently they submitted revised timelines, BCVRS is in full support this adjusted timeline. The knowledge we currently have suggests a faster implementation process. The resources and expertise are available to establish a Canadian VRS in a timely manner.
10. In reference to **Sasktel’s** derogatory comments during the VRS Hearing, the BCVRS would like to formally state that they do not acknowledge Sasktel’s insular and limited perspective on issues related to VRS and Deaf persons. On the positive note, BCVRS has been contacted by members of the Saskatchewan Deaf Community and they have recently formed their own VRS committee. We would like to further add with regard to virtual avatars serving as interpreters in Video Relay service, that they cannot represent the nuances, the facial grammar, which is a fundamental component of American Sign Language and LSQ. Avatars are unable to convey the emotional aspect of both ASL and LSQ.
11. **BCVRS supports** other presentations, such as reference on *NOC 2013-155* Hearing transcript, line 719 – Ms. Moreland of Ontario Video Relay Service Committee, that **indicated the need for within CRTC’s framework, a body that handles accessibility issues**, but we would rather have it called the *Accessibility Office*. We would like to reiterate that the CRTC has discussed the concept and need for disability groups to be represented within the CRTC structure. Here are the links to some of that discussion.
<http://www.crtc.gc.ca/eng/publications/reports/rpps/rpp2013/rpp2013.htm>
<http://www.crtc.gc.ca/eng/publications/reports/rp080418.htm>
<http://www.crtc.gc.ca/eng/archive/2009/2009-430.htm>

You will see on page 5, the following diagram of the model that BCVRS suggests and endorses to be implemented with the following terms of reference:

BOARD OF GOVERNANCE (BoG):

The Board of Governors Committee consisting of 7 members screened based on appropriate qualifications, with the majority being Deaf representatives. Its primary purpose is the oversight of the functionality and utilization of VRS ensuring general accessibility of VRS in Canada.

The BoG will delegate the following duties to the selected VRS provider(s):

- Oversees the quality and provision of VRS services
- Ensuring, maintaining and monitoring, promoting and enhancing the quality and ethics of interpreters
- Overseeing the quality and updating of technology/devices made available for the public to utilize VRS in Canada
- Operating and maintaining platform and its interoperability
- Ensuring VRS providers practice appropriate ethics – delivery and provision of services, both technology and interpretation

PLATFORM:

- Criteria established by CRTC with partnership of BoG and consultation with Stakeholders
- Selection of Video Relay Services Provider companies. CRTC in partnership with Board of Governors (BoG) and consultation with Stakeholders Committee
- Request for Proposals (RFP) process

TELECOMMUNICATIONS ACCESSIBILITY FUND (TAF):

- To be established by CRTC and to be similarly structured/modeled as the existing Broadcasting Accessibility Fund(BAF)

FUNDING WATCHDOG:

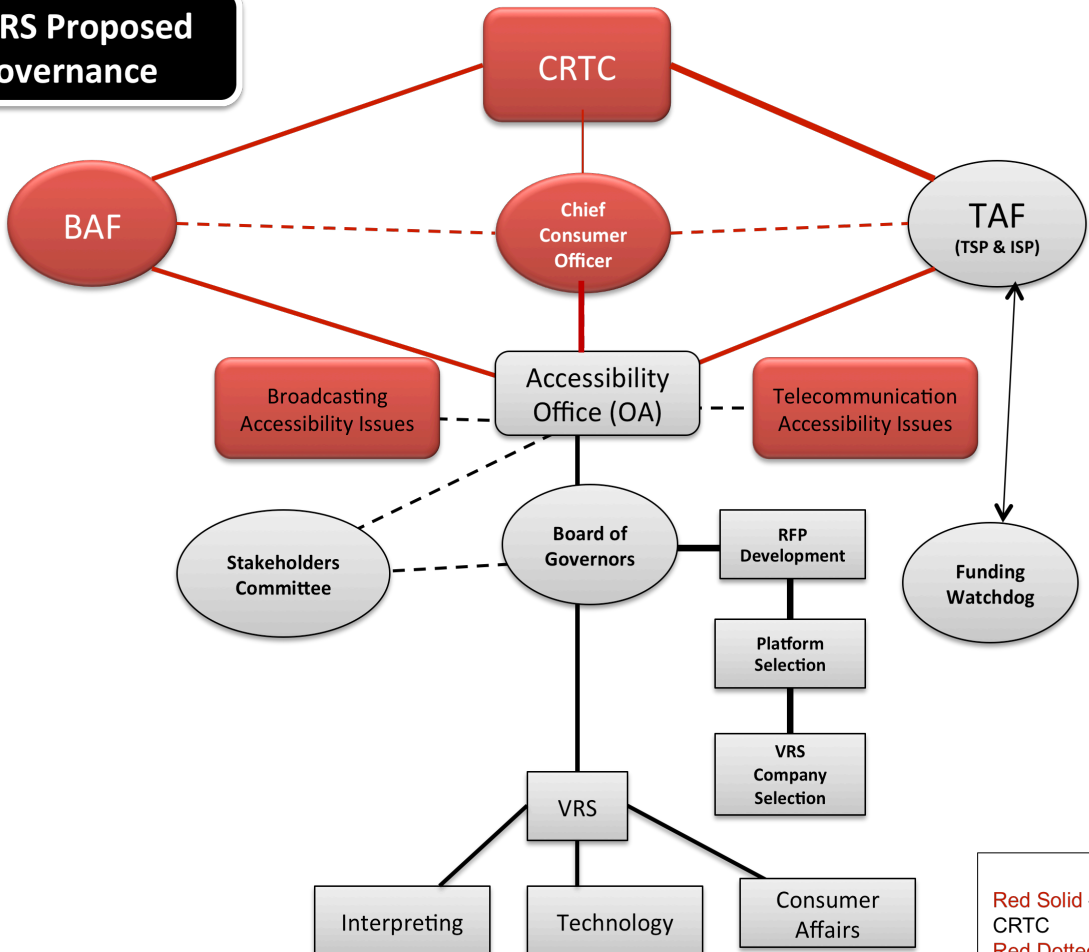
- Independent entity consisting financial professionals/experts
- Overseeing the financial transactions
- Reporting to TAF/CRTC/Chief Consumer Officer
- Preventing illegal and fraud activities
- Ensuring financial transparency

STAKEHOLDERS COMMITTEE:

- Representing wide-spectrum of Canadians and providing consultation, advice and research to the BoG.
- Ensuring appropriate functionality and transparency of VRS
- Suggested possible Representatives:
 - o CAD - Canadian Association of the Deaf
 - o AVLIC - Association of Visual Language Interpreters of Canada
 - o CCSD - Canadian Cultural Society of the Deaf
 - o CHHA - Canadian Hard of Hearing Association
 - o CNSDB - Canadian National Society of the Deaf-Blind
 - o Quebec - LSQ & French
 - o VRS Committee Representatives
 - o CRTC - Chief Consumer Officer
 - o BAF - Broadcasting Accessibility Fund Representative
 - o TAF - Telecommunications Accessibility Fund Representative

Respectfully submitted,
BCVRS Committee

BCVRS Proposed Governance



Shaded Boxes
 Red – already in place at CRTC
 Grey/Black outline – Proposed

Lines
 Red Solid – Responsible to the CRTC
 Red Dotted Line – indirect reporting
 Black solid – suggested direct reporting
 Black Dotted Line – suggested indirect reporting