

Website: deafwireless.ca | cad.ca
E-mail: lisa@deafwireless.ca | ffolino@cad.ca

April 17, 2018

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

**Re: CRTC TRP 2016-496 - Modern Telecommunications Service Implementation – follow-up:
Request for information regarding accessibility - DWCC and CAD-ASC Perspectives and
Experiences**

Dear Mr. Doucet:

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**), henceforth collectively referred to as “DWCC et al” thank the opportunity to participate in the commentary and input to the companies’ Accessibility Reports connected to TRP 2016-496.

Deaf, Deaf-Blind and Hard of Hearing (DDBHH) Canadians views when it comes with creating or designing telecommunications services and programs comes with the afterthought as FCC’s former Chair, Tom Wheeler said it succinctly, “the communications system should be one where there is“... designing for ALL kinds of people with its product ...(or service)...in the first place, and not an afterthought.” (last quoted in: [RFI Response to TSP Answers TNC 2017-33](#)). Truthfully DDBHH Canadians are a part of the Canadian population and they have the right to partake in public functions at par with fellow Canadians. In other words, Canadian DDBHH are Canadian citizens too.

In this document, DWCC et al are responding to the companies’ accessibility reports, and we decided rather than writing only from the people who had met the companies’ own experience attending these meetings, we would conduct a brief internal survey of DWCC members, CAD-ASC board members, and frequently contacted people to show a sampling of the experiences that our committee and board members have had regarding accessibility with both wireless and internet companies. and in particular with accessibility services of each or both of the companies, Text with 911 with the wireless companies, and IP Relay services with either of the companies. Additionally, overall comments about the Customer service accessibility will be shared.

DWCC et al would like to mention that there are accessibility issues that need to be addressed in order to have barriers removed to ensure **functional equivalence and equal access** for all accessibility groups to fully participate in Canadian society. The TSPs and WSPs needs to continue and work with our accessibility groups to host accessibility advisory meetings more than one time for ensuring that our suggestions are being incorporated such as respecting our recommendations that must be included.

Thank you for providing the opportunity for the DWCC et al to provide their unique perspective as Deaf, Deaf-Blind and Hard of hearing Canadians in addressing accessibility issues that are being addressed and hopefully to resolve these issues in the collaboration and working together.

Please feel free to contact the following if you have any questions.

Sincerest regards,

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

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

cc: Megan McHugh, President, Canadian National Society of the Deaf-Blind (CNSDB)
Elliott Richman, Assistant Director of Deaf Outreach, Deafness Advocacy Association Nova Scotia (DAANS)
Gary Malkowski, Canadian Hearing Society, CHS
Anthony Tibbs, Media Access Canada, MAC
Lui Greco, Canadian National Institute of the Blind, CNIB
Monica Auer, FRPC
All parties in CRTC 2016-496 proceeding

TABLE OF CONTENTS

a) About Us	Page 4
b) Deaf, Deaf-Blind, Hard of Hearing Canadians	Page 4
c) Introduction	Page 4
d) Accessibility Legislation and ASL & LSQ Recognition	Page 5
e) United Nations Convention on the Rights of Persons w/ Disabilities	Page 5
f) Important Wireless Accessibility Issues	Page 7
g) Disparity Concerns	Page 7
h) Summary of Meetings with 5 Companies	Page 10
i) Rogers - March 29, 2017	Page 11
ii) Telus - March 30, 2017	Page 13
iii) Freedom Mobile - May 11, 2017	Page 14
iv) Bell - May 11, 2017	Page 15
v) Shaw - May 10, 2017	Page 17
i) Summary of CWTA Wireless Accessibility Committee	Page 17
i) English/ASL Meeting - September 20, 2017	Page 17
ii) French/LSQ Meeting - December 4, 2017	Page 18
j) Response to Accessibility Reports and RFI Responses:	Page 19
i) Rogers	Page 19
ii) Telus	Page 22
iii) Bell	Page 23
iv) Shaw and Freedom	Page 24
v) Eastlink (Bragg)	Page 25
vi) Cogeco	Page 26
vii) Videotron (Quebecor)	Page 26
k) Internal Survey Results Categorized	Page 27
i) Wireless & Text with 911:	
i) Rogers Wireless and Fido	Page 27
ii) Telus Mobility and Koodo	Page 32
iii) Bell Mobility and Virgin Mobile	Page 37
iv) Freedom Mobile	Page 40
v) BellMTS	Page 41
vi) Videotron (Quebecor)	Page 41
vii) Other (Public Mobile)	Page 45
ii) Internet	
i) Rogers	Page 46
ii) Bell	Page 47
iii) Shaw	Page 49
iv) Other	Page 49
iii) IP Relay and Customer Service - Overall	Page 50
iv) Full Complete Analysis of Overall Survey	Page 52
l) Unlimited Data	Page 57
m) December 2017 10GB/\$60.00 Promotion Impacts	Page 58
n) Recommendations for Solutions	Page 60
o) Conclusion	Page 61
p) Appendix	
I. Appendix A - Internal Survey Questions (English/French only)	Page 62
II. Appendix B - Overall Survey Graph and Charts Summary	Page 68

ABOUT US

Members of DWCC et al introduce themselves as follows:

*The **DWCC-CSSSC** is a standing committee of the CAD-ASC and is a group of Deaf, Deaf-Blind, and Hard of Hearing consultants, analysts and committee volunteers across Canada. DWCC's mandate is to advocate for equality for Deaf, DeafBlind and Hard of Hearing Canadians in wireless telecommunications as in:*

- *Fair, uniform, cost reasonable wireless data plans for ASL and LSQ users*
- *Transparent and clear advertisement of plans offered*
- *Decreased disparity of wireless product and service provisions within the companies*
- *Promotion and availability of wireless software applications (apps) that ensure functional equivalency*
- *Accessible wireless emergency service provisions in Canada*

*The **CAD-ASC** is a national information, research and community action organization of Deaf people in Canada. Founded in 1940, CAD-ASC provides consultation and information on Deaf issues to the public, business, media, educators, governments and others; conduct research and collects data. CAD-ASC promotes and protects the rights, needs, and concerns of Deaf people who use American Sign Language (ASL) and langue des signes québécoise (LSQ). CAD-ASC is affiliated with the World Federation of the Deaf (WFD), and CAD-ASC is a United Nations-accredited Non-Governmental Organization (NGO) to the Convention on the Rights of Persons with Disabilities.*

DEAF, DEAF-BLIND, HARD OF HEARING CANADIANS

To understand our accessibility group, reliable statistics on Deaf Canadians are hard to collect, and no two organizations seem to agree on the numbers involved. It is CAD-ASC's belief to use the traditional 'one in ten' formula for estimating statistics, with strong disclaimers. This formula estimates that there are 357,000 culturally Deaf Canadians and 3.21 million hard of hearing Canadians. It is CAD-ASC's opinion that *no fully credible census of Deaf, deafened, and hard of hearing people has ever been conducted in Canada.* ([CAD-ASC website](#)).

The Canadian National Society of the Deaf Blind estimates there are 69,700 Deaf-Blind Canadians over the age of 12 living with the dual disability of deafness and blindness or a combination of both vision and hearing losses that limit their everyday activities. The Canadian Helen Keller Centre ([CHKC](#)) provided this estimated Deaf-Blind population information on an earlier version of their website, and it can now be found on this separate [website](#) source by Senator Yonah Martin, who took time to recognize Deaf-Blind Canadians.

Going forward in this document, we summarize Deaf, Deaf-Blind and Hard of Hearing Canadians as "**DDBHH**" the reordering of the wording was recommended by members of the CNSDB in order to be inclusive of Deaf-Blind members within the Deaf community.

INTRODUCTION

This document will outlines accessibility issues from CAD-ASC, DWCC, and CNSDB perspectives and experiences in the following themes below:

1. Meeting experiences with five companies regarding their company accessibility products, features and services;
2. Accessibility Plan for Deaf, Deaf-Blind and Hard of Hearing (DDBHH);
3. Accessibility Website;
4. Accessibility stores, centres of excellence , and customer service considerations;
5. Accessible company products and services information in ASL and LSQ videos;

6. Recommendations from our accessibility groups and moving forward for the further collaboration and to see these changes that will meet with accessibility needs;
7. Internal survey of a small sampling of DDBHH (51 respondents) from DWCC, CAD-ASC as well as LSQ Deaf community members to examine current wireless company accessibility plan statuses, internet company trends, Text with 9-1-1, IP Relay service usage measures, and customer service input on accessibility and finally gather overall comments to share for interested parties; and
8. Overview of the experience of the 60-10 promotions in December 2017 and impacts on the accessibility plans.

9. First, we begin with an introductory overview on accessibility as a whole with current issues and affairs in Canada, with the impending federal accessibility legislation, its applications to ASL and LSQ recognition, and the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD). A brief overview follows of wireless accessibility issues.

FEDERAL ACCESSIBILITY LEGISLATION AND ASL & LSQ RECOGNITION

10. Canada plans to introduce federal accessibility legislation in 2018-2019 where one of the federal jurisdictions on broadcasting and telecommunications that will impact and address these accessibility issues within the federal jurisdictions. With this, the recognition of our two national Sign languages: American Sign Language (ASL) and langue des signes québécoise (LSQ) as official languages that will be tied with the legislation as a form of equal accessibility for promoting full accessibility to information, communications and services.

11. The Article 21 (*Freedom of expression and opinion, and access to information*) of the United Nations Convention on the Rights of Persons with Disabilities requires State parties such as Canada, to ensure that individuals have the right to freedom of expression and opinion; to provide information that is available to the public by both public and private entities in accessible formats. Also, the *Article 21 states that countries must ensure the acceptance of Sign languages in official interactions, and to recognize and promote the use of Sign languages.*

12. This is where CAD-ASC and DWCC bring in the point where all telecommunications service providers, wireless service providers and internet service providers in Canada should be making an effort to promote full accessibility to information and services, such as to add ASL and LSQ videos to their accessibility pages and other accessibility services, as laid out in the CRPD.

UNITED NATIONS CONVENTION ON THE RIGHTS OF PERSONS WITH DISABILITIES

13. Canada ratified the [United Nations Convention on the Rights of Persons with Disabilities](#) (CRPD) on March 11, 2010, which confirms that Canada has an obligation to follow the Convention focusing on the rights of persons with disabilities in the State parties (countries).

14. The State parties meaning our country Canada needs to fulfill its obligation under the CRPD outlined below thus, Canada needs to take appropriate measures to ensure full and equal rights of Canadians who are Deaf, Deaf-Blind and Hard of Hearing.

15. In application to this document, pay particular attention to Article 9: Accessibility, whereas within the Convention there is a requirement of State parties to:

1) To enable persons with disabilities to live independently and participate fully in all aspects of life, States Parties shall take appropriate measures to ensure to persons with disabilities access, on an equal basis with others, to the physical environment, to transportation, to information and communications, including information and communications technologies and systems, and to other facilities and services open or provided to the public, both in urban

and in rural areas. These measures, which shall include the identification and elimination of obstacles and barriers to accessibility, shall apply to, inter alia:

(a) Buildings, roads, transportation and other indoor and outdoor facilities, including schools, housing, medical facilities and workplaces;

(b) Information, communications and other services, including electronic services and emergency services.

2) States Parties shall also take appropriate measures:

(a) To develop, promulgate and monitor the implementation of minimum standards and guidelines for the accessibility of facilities and services open or provided to the public;

(b) To ensure that private entities that offer facilities and services which are open or provided to the public take into account all aspects of accessibility for persons with disabilities;

(c) To provide training for stakeholders on accessibility issues facing persons with disabilities;

(d) To provide in buildings and other facilities open to the public signage in Braille and in easy to read and understand forms;

(e) To provide forms of live assistance and intermediaries, including guides, readers and professional sign language interpreters, to facilitate accessibility to buildings and other facilities open to the public;

(f) To promote other appropriate forms of assistance and support to persons with disabilities to ensure their access to information;

(g) To promote access for persons with disabilities to new information and communications technologies and systems, including the Internet;

(h) To promote the design, development, production and distribution of accessible information and communications technologies and systems at an early stage, so that these technologies and systems become accessible at minimum cost.

16. First and foremost, the section of the CRPD that focuses on a state's obligations under the CRPD to recognize and adopt national sign languages. In Canada, this would reference to our two national Sign languages: ASL and LSQ. Recognizing and adopting our two national sign languages ensures that the country is both providing accessibility and preserving the Deaf community's cultural identities, of which sign language is treasured. If you consider the impending federal accessibility legislation tied with ASL and LSQ recognition, it would ensure the recognition of the cultural and linguistic identity of Deaf community members while simultaneously providing accessibility to public services such as access to the information, communication and its services.

17. Information dissemination and communication as guided by the CRPD also ensures the provisions of full accessibility and protection for Canadians who are Deaf, Deaf-Blind and Hard of Hearing simply because it is a human right to receive information on an equal basis with other Canadians. There should be undue burden from the telecommunications service providers, internet service providers and wireless service providers for the full accessibility and inclusivity of DDBHH Canadians.

18. It is important to note that opening up accessibility to public services and society, which refers to the slogan by the United Nations: **“Nothing About Us, Without Us”** requires that Canadian telecommunication service providers, internet service providers, wireless service providers, regulators, lawmakers, and civil society groups to focus on resolving these accessibility issues with the very people who have the accessibility issues not for them. Members of these accessibility groups such as Deaf, Deaf-Blind and Hard of Hearing Canadians need to be included and consulted with for decision-making on these accessibility issues.

IMPORTANT WIRELESS ACCESSIBILITY ISSUES

19. In order to have DDBHH communication access, DWCC et al need to ensure that there is a reasonable pricing accessibility options for the primary use of video call communications in order to achieve functional equivalency on the equal basis with audio-speaking for hearing people to use their phone communications.

DISPARITY CONCERNS

20. DWCC et al, has a strong concern with the manner of how the wireless companies are conducting their business making it difficult for DDBHH community members to find information about accessibility plans for all companies.

21. The Deaf community is small, at community events, when DDBHH gather, and they discuss their wireless plans, they find their frustrations in common. For example, even when they are customers of the same company, and have the same amount of monthly GB allowances, they are overpaying (paying higher than they should) or seeing “special packages” cheaper than their own, which creates a sense of unfairness.

22. CRTC and the wireless companies most likely do not realize that the Deaf community can be such a small community, and Canada can seem all of sudden that much smaller, especially with the tendency for the majority of Deaf Canadians as friends with each other on Facebook. It is within Facebook that they share and compare and that is where the DWCC et al observes people upset and sensing a rampant sense of unfairness.

23. The DWCC et al wishes to see this disparity of pricing of packages with the same monthly GB allowances by wireless companies allocated to Deaf customers **stop**. We are noticing the pricing is varying in geographic regions, there appears to be a regionalistic pricing scheme which should **not apply for accessibility groups**. It would be more conducive to create a same-across the board benefit for all customers of the same company and reduce the disgruntledness among the DDBHH.

24. It would be much more productive to display simple tables with for example, 3 different offerings of specialized GB packages and prices at discounted prices, or \$30.00 discounts applied uniformly across the board.

25. Why \$30.00? This was the discount a few years ago to the knowledge and experience of the DWCC Chairperson with one of the “big three” companies. Later, this discount became \$15.00, slashed in half, as stated on record by another of the big telecoms at the TNC 2015-134 public hearing, see [transcript](#).

8444 THE CHAIRPERSON: We're cutting to the end. So just a few more questions. And I'll shuffle them around because I think we may be losing our interpreters soon, but there are questions that may be of interest to the deaf community.

8445 Earlier you said you had a \$15 discount for voice. What's the \$15 discount, on what?

8446 MR. WOODHEAD: The monthly plan.

8447 THE CHAIRPERSON: Which is? Of how much?

8448 MR. WOODHEAD: I'm not sure. I don't know if -- Chris, do you know?

8449 MR. LANGDON: Yeah, we generally sell them as combined voice and data plans, so you can get \$75 plans, so it would take you down to 60 or so, which approximates a data-only configuration.

8450 THE CHAIRPERSON: And is that \$15 based on metrics that what would be a normal, standard voice versus data mix, or why did you just choose \$15?

8451 MR. LANGDON: Yeah, it's competitive so we look at whenever we set prices, it's done on a competitive sort of context, so we look what's out there and that's approximated.

8452 THE CHAIRPERSON: Well, I'm not sure competitive is relevant in this case. It is a group of people that really don't use voice. One would think that you would logically and rationally look at what the normal usage of voice would be and say, "Well, these folks don't use it; therefore, we discount it."

8453 MR. LANGDON: I'm sorry, is that your ---

8454 THE CHAIRPERSON: So why do you mention that it's a competitive issue? It's --

8455 MR. LANDGON: Oh, not a -- so when we look at benchmark pricing, it's obviously done looking across carriers, and when we look at voice plans, like, on prepaid, it looks like it's about \$15. That would be our determination and that's the discount.

8456 Could you help me?

8457 MR. WOODHEAD: The only -- I'm not sure I can. The only other possibility here is that there could be competitive data only plans that we're basing that off of.

8458 THE CHAIRPERSON: Would you undertake to actually explain how you got to \$15?

8459 MR. WOODHEAD: Yes.

8460 **UNDERTAKING**

8461 THE CHAIRPERSON: Thank you.

26. DWCC et al is uncertain why the companies have currently put on their websites the accessibility discount at \$20.00 when it used to be \$30.00, why the price drop? It doesn't make sense when inflation comes into play. Additionally, there can't really be a "one size fits all" discount like this because for the people who have 15GB data plans, they can't really benefit if they are still paying \$200.00/month for that data usage for video communications because with taxes they would still need to pay nearly \$200.00.

27. The companies need to stop the price gouging, with the obviously reduced discount pricing. Instead the benefits and discounts should be applied in these specific departments - loyalty and accessibility. DDBHH people have increased video communications which is no fault of their own. These Canadians cannot use audio, **they can only use video**, thus utilizes only data.

28. It is DWCC et al's view that companies can surely get more money from those that can hear, which is a large portion of 30 million smartphone and wireless customers in Canada, this means clearly they can afford to allocate discounts or special offerings to a smaller crop of customers from the accessibility groups.

29. Additionally, DWCC et al et al have to question once again, why can't this be done in Canada, there are AT&T Text Accessibility Plans ([AT&T TAP](#)) seen in the table below

Smartphone Accessibility plans ¹				
Data	300MB	5GB	6GB	8GB
Approximate FaceTime / video calling ²	Not Available	15 hours	20 hours	40 hours
Monthly charge	\$40/month	\$55/month	\$70/month	\$90/month
AT&T Messaging	Unlimited	Unlimited	Unlimited	Unlimited
Overage charge	\$20 per 300MB	\$10 per 1GB	\$10 per 1GB	\$10 per 1GB
Voice calls	Unlimited	Unlimited	Unlimited	Unlimited

30. In 2018, after our survey was distributed in 2015, pre-VRS we realize currently things may be different, with data usage and pricing, and we realize a new survey needs to be conducted to see if our information is still relevant now and today, the usage of video communications has changed in telecommunications Canada, with the arrival of SRV Canada VRS video relay services.

31. It is our DWCC et al's prediction that the usage of data by DDBHH sign language users of ASL and LSQ has certainly leaped due to using SRV Canada VRS. DWCC et al observes it was two companies that were smart to capitalize on untouched data if using the SRV Canada VRS app this is true functional equivalency. Currently Telus and Rogers only have this as part of their packages. DWCC and CAD-ASC view and favour that CRTC **should** allow this for accessibility reasons for all the seven companies in this report so that the data used for VRS on wireless devices is untouched on monthly allowances. This is the true essence and meaning of functional equivalency for Canadian DDBHH.

SUMMARY OF MEETING WITH 5 COMPANIES

32. As a result of TRP 2016-496 four of the wireless companies reached out to have an engagement consultation meeting with DWCC, CAD-ASC and CNSDB. Prior to each of the meetings, DWCC and CAD-ASC prepared a presentation deck which summarized our survey results thus far from 2015 to 2017 from two surveys we had conducted between these years for the CRTC proceedings specifically TNC 2015-134 and TNC 2016-116. The survey results summary deck that we sent prior to these meetings can be seen [here](#). Survey Handout from the TNC 2015-134 hearing was also sent along to some companies, as seen [here](#). Additionally some companies requested Marketing

statistical information, seen in this document [here](#). Some companies asked for other information specific to their company and these were provided in advance as well.

33. Generally, representatives from our three organizations, were surprised that every meeting we attended there generally were no person from an accessibility group, not even a deaf, deaf-blind, or hard of hearing staff team member on the accessibility team for each of the companies. Prior to these meetings the email signature of the staff representatives of these companies were signed off with job titles as “Accessibility Expert” which our group found quite offensive after arriving to the meetings and discovering they are not disabled or from an accessibility group themselves. Frankly, we do not consider them an expert unless they have a disability themselves. This type of power ableism, whether it is subtle and unintended, needs to change as the approach is not appreciated.

34. To make an application to the previous point above, the Canadian Association of the Deaf- Association des Sourds du Canada has a position paper on [Employment and Employability](#) that describes exactly what its observation was coming away from the wireless company meetings. Here are some words:

“The real causes of high unemployment in the Deaf community are hearing patronization, inappropriate educational methodology, and systemic discrimination. In 1998, we conducted a formal and rigorous data collection project involving more than 1,000 people in the Deaf community. We found that only 20% of Deaf Canadians are fully employed; 42% are under-employed; and 38% are unemployed. 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%, an increase of 2% since 1998. All of the remaining 60% were either self-employed or short-term contract workers, 24% of them part-time.

The increase in unemployment since 1998 more or less matches the increase in unemployment among the general populace. That means, however, that it is still approximately 32% higher than the general unemployment rate. In 1998, less than 6% of respondents were self-employed; in 2015, this figure had exploded to over 22%. We attribute this increase to two factors: (1) the Internet and electronic communications/media as a whole have opened up opportunities for Deaf Canadians to create their own jobs as software engineers, game creators, on-line businesses, or even just buying and selling through eBay, Kijiji, and similar markets; (2) Deaf individuals have given up on governments to create jobs and have given up the struggle to convince non-Deaf employers to hire them; instead, they have resorted to supporting themselves by serving their own community, either through personal businesses or through contract employment.

This conclusion extends the findings of the 1998 survey which proved that the Deaf community is its own best employers, particularly in the fields of education, social services, technology (e.g., website design and management), and video productions. It should be noted that, in common with most self-employed non-Deaf Canadians, Deaf entrepreneurs receive low income from their businesses. A majority – almost one-third – were earning less than \$15,000 per year, compared to the Canadian average income of \$37,313. A mere 21% of Deaf Canadians earn over \$50,000 per year. The primary reason why Deaf people can only find work in the Deaf community or by running their own small enterprises is the barriers to their participation in non-Deaf society. Potential employers may be reluctant to hire Deaf workers because of assumptions that communicating with them is “too much trouble” and meeting their needs in the workplace would impose a financial strain.”

35. DWCC, CAD-ASC and CNSDB came away from these meetings with the realization that we must educate and encourage company accessibility teams to include and be made up of some representatives of accessibility groups that face the challenges on a daily basis and truly understand

and can best empathize with the people coming from external groups or company clients because they understand our lived experience. *“Nothing About Us, Without Us.”*

36. Responding to each of the meeting experiences begins here:

ROGERS

37. In response to Rogers report outlining that they consulted with our groups, DWCC and the CAD-ASC do confirm that along with the Canadian National Society of the Deaf-Blind (CNSDB) were invited on March 29, 2017 and met with Rogers to obtain feedback on products, services and challenges/ barriers to service accessibility. Rogers has only met with us once.

38. This meeting was DWCC and CAD-ASC's first meeting, of all the wireless companies, and we used that meeting to learn what approach to be taking for the other wireless companies. However in that meeting with Rogers, it left us with a feeling about Rogers that we did not have with the other companies which was rather disappointing. The team that organized the meeting didn't seem to be well organized following agenda as it was laid out. Secondly, after seeing the other presentations, we realize the culture is different at Rogers, and the meeting was not planned as well as the others. There was no company proposed accessibility plan arranged to share at our meeting.

39. DWCC, and CAD-ASC brought a presentation deck to the meeting as we thought to prepare to respond/answer to one of the questions that Rogers had for us, set on page 10 of our presentation deck for [here](#). DWCC and CAD-ASC spent about 20 minutes doing this presentation in ASL through our interpreters. There didn't seem to be much of a response from their end after our presentation, and DWCC et al recalls they felt the need to be repetitive because of the lack of response from their end.

40. DWCC et al understood Rogers explanation that the team who meets with us doesn't make the decision and it goes to the sales department for the decision-making. When Rogers brought up the wireless plan costs, and explained that they were going to leave the table/charted plan on their website as is, and not make any changes. DWCC and CAD-ASC's response was due to reviewing the existing table/chart prior to the meeting, and not liking how it was set up, as DWCC, CAD-ASC (and CNSDB) conclusively our groups felt it was more work for the customer to try to figure out the pricing after 4GB, from the table. Our representatives suggested that it needed to be simpler. The CNSDB also explained that tables were very difficult for Deaf-Blind or Blind to read.

41. Prior to the meeting, the 3 groups jointly did the cost calculations referencing to the table, for 6GB we found the result calculations pricing was too high. And we made a comment that was not easy for us to make but we had to be honest as we were representatives of 365,000 Deaf Canadians, using the CAD-ASC's estimated statistics, and stated that we did not accept the table/chart pricing. The recommendation from our groups was that Rogers should return to their team and consult with them and call us back with a better accessibility plan proposal for us to review. They never called us back or consulted with us since. The last time we saw Rogers was at the CWTA English/ASL meeting.

42. Of important note for CRTC to be aware of, according to three of our surveys and our internal survey, DWCC et al found that from 27% to over 50% which is over half of our accessibility group community members are customers of Rogers Wireless. For this report we additionally did an internal survey of DWCC members, CAD-ASC Board directors as well as frequently communicated individuals, to a total of 51 surveys and found that Rogers had the highest loyalty membership from our community however the most disparity of wireless pricing for this same group of Rogers wireless customers. It is our wish to return to the Rogers accessibility team and negotiate accessibility plan design for our group.

43. For everyone's information, DWCC et al knows from community input and members' own personal experiences that the reason why Rogers is so popular among our consumer group because they have the best quality of video communications on their network and the least problems with connectivity out of all of the companies so we are not surprised to see the continued trend of high Rogers customer base from our accessibility group.

44. For current status updates, DWCC et al sees that Rogers has rather went ahead and established the same Accessibility Plan arrangement that Telus set up, with \$20.00 accessibility discount, and unlimited to SRV Canada VRS but we confirm that this was not done in consultation with our group.

45. After our meeting, we revised our presentation to remove the parts (slide 10) that seemed to come across and not clear or create worry on the companies' behalf, you can probably notice when you review our presentation deck [here](#).

46. Conclusively, DWCC and CAD-ASC find that from our company meetings altogether, Rogers was disappointingly the least approachable out of all the companies that invited us for meetings, for accessibility issues. This needs to change, and there needs to be more interactive communications and consultations with our group going forward. DWCC, CAD-ASC and CNSDB would like to meet with Rogers Wireless again and have a real interactive meeting and consultation.

47. Recommendations from the Rogers Accessibility Meeting Experience:

- a. Set up another meeting preferably with the decision-makers at Rogers, and show you are listening and responding and ask questions.
- b. Provide a clear Agenda with new proposed plans for us to discuss or examine.
- c. Produce ASL and LSQ videos that promote the Rogers Accessibility plan and their accessibility services, including that interpreters can be provided upon request.
- d. Add a deaf or hard of hearing Rogers staff on their accessibility team and to join the next ROGERS Accessibility meeting whether it be on wireless specific or overall accessibility issues.
- e. Create a one-stop e-mail address for accessibility issues - accessibility@rogers.com

TELUS

48. The next day, March 30, 2017, the meeting with Telus was very much in contrast with Rogers, with a very well prepared Accessibility department team prepared Agenda, with the focus being on wireless packaging and these accessibility related issues with first allowing us to review what was important to our group based on our 2015 wireless survey results, as seen in this presentation deck [here](#), There was real interest in the information that CAD-ASC, CNSDB and DWCC shared, with questions and clarifications asked through out by members of the Telus team. After we completed the presentation, the progress was steadily done going through their Agenda and in the end showing us a very clear table of wireless data accessibility plan pricing proposals and we agreed with it.

49. We should note that prior to our meeting with TELUS, we also sent this document in advance as we did pass a question from TELUS at a previous meeting to community members for their response, at a community town hall, and this can be seen [here](#).

50. DWCC et al recalls having met with TELUS the most number of times compared with the other company, counting up to three times, with the last meeting more in depth about accessibility as a whole to all of Telus's services. Once again we felt heard and included in the meeting and always feel our meetings are interactive and inclusive.

51. At one of these meetings, DWCC and CAD-ASC did recommend that after seeing blind staff members of TELUS at the last accessibility meeting in October 2017, that we would like to see Deaf or hard of hearing staff members part of future TELUS accessibility meetings. Additionally a final

comment, we do wish to understand why CNSDB was not invited to TELUS follow-up meetings on accessibility. We were disheartened at this exclusion.

52. There is one incident we need to share however, DWCC is very disappointed in the lack of inclusivity from TELUS of members from DWCC especially, to participate in a Telus *TELUS Design Challenge* event in Toronto on January 26 and 27, 2018, which the primary focus was on two areas wireless accessibility and accessibility centres of excellence. These were the very topics that DWCC has been discussing at previous meetings. After discovering information about the event on Facebook, DWCC felt someone needed to be there who was very aware of the issues, and reached out to the CAD-ASC President just because he lives in Toronto. As a result, he turned out to be available, thankfully, and as a result, scrambled to request accessibility and showed up on DWCC's behalf. Only two other deaf people were invited, and they were both persons of colour and it appeared that two deaf people were "out" as in they didn't know the subject matter very well at all and were lost. Mr. Folino had to guide and support them. The activities had 7 accessibility related questions for groups to discuss including wireless accessibility questions and a part about accessibility centres of excellence. TELUS anticipated a large attendance, but in the end only approximately 30 attended. For the next time such an event takes place, it is the recommendation that DWCC needs to be included, and costs for their participation covered.

53. Overall, DWCC and CAD-ASC find that TELUS are good listeners and ask questions and approachable and the general feeling is they take what we say into real consideration, we feel valued and they do include people for the most part.

54. Recommendations from the TELUS Accessibility Meeting Experience:

- a. Continue to be great listeners and conduct interactive discussions at consultative sessions
- b. Be sure to include the CNSDB in future meetings.
- c. Produce ASL and LSQ videos that promote the Rogers Accessibility plan and their accessibility services, including that interpreters can be provided upon request.
- d. In any TELUS accessibility related event(s) where DWCC has expertise and interest in contributing, it is not beneficial to leave the wireless committee out.
- e. Add a deaf or hard of hearing TELUS staff on their accessibility team and to join the next TELUS Accessibility meeting whether it be on wireless specific or overall accessibility issues.
- f. Create a one-stop e-mail address for accessibility issues - accessibility@telus.com

FREEDOM MOBILE

55. On May 11, 2017, DWCC, CAD-ASC and CNSDB attended an in-person meeting in downtown Toronto, and we had a pleasant meeting. The Freedom staff team were very personable, receptive and prepared. Freedom staff had already thought ahead for accessibility plan pricing.

56. The plans they described were the best accessibility deal of them all. They spent some time explaining to us about the service provisions by Freedom. We learned that there were geographic limitations of Freedom Mobile's service provisions, with full coverage in the metropolitan areas Vancouver, Edmonton, Calgary, Toronto, and Ottawa.

57. DWCC, CAD-ASC and CNSDB did share information from our presentation deck shared [here](#).

58. At the time they had 3G network capability and not yet reached ultimate LTE levels, which is what we require for clear video communications so there was some discussion around that, which also ironically became an issue during the meeting, with imperfect video connectivity for our VRI interpreting team to assist in facilitating the meeting communication.

59. Issues around the smartphone models came up and about the challenges they were having to have iPhone models added to their wireless device product lineup, which happened to be the most popular smartphone used by DDBHH according to our 2016 survey results.

60. Overall, the meeting was very good, and the groups were left with aspirations that Freedom had a wider net of coverage with its great accessibility plan and great people.

61. Recommendations from the FREEDOM Accessibility Meeting Experience:

- a. Continue to be great listeners and conduct interactive discussions at consultative sessions
- b. Our collective group will be glad to return to discuss any questions they may have and receive any company updates regarding LTE coverage, whether the smartphone issues resolved and finally discuss, brainstorming on how to collaborate to promote their plans as an option to our consumer group.
- c. Produce ASL and LSQ videos that promote the Freedom Accessibility plan and their accessibility services, including that interpreters can be provided upon request.
- d. We understand Freedom is a new company, but if it were possible, the recommendation is to add a deaf or hard of hearing staff on their accessibility team and to join the next FREEDOM Accessibility meeting whether it be on wireless specific or overall accessibility issues.
- e. Create a one-stop e-mail address for accessibility issues - accessibility@freedommobile.ca

BELL

62. The meeting with Bell was held on May 11, 2017, where the agenda was very intensive to discuss a range of accessibility issues including accessibility service centres, the wireless plan, the website design, and other things. They did allow for the meeting to start allowing us to review what was important to our group based on our 2015 wireless survey results, as seen in this presentation deck [here](#). There was real interest in the information that CAD-ASC, CNSDB and DWCC shared, with questions and clarifications asked through out by members of the Bell team.

63. During the meeting, as an agenda item, it was website design was discussed whereas DWCC, CAD-ASC and CNSDB shared our feedback to improve the website design but it appears that Bell did not listen our suggestion because as we see, it is not incorporated in the website as of today, the website design remains the same since our first meeting in May 2017. The webpage title is clearly offensive to our Deaf customers because the language states "Hearing and Speech" which does not meet our language accessibility respecting Sign languages. The "Hearing and Speech" with these logos on their Bell's website on the Accessibility Service pages represents the Hard of Hearing people. CAD-ASC and DWCC made these recommendations that a new section to be created called "Sign language users" with the Sign language symbol that consists these information about our accessibility needs that are applied to Deaf people. To this date, Bell did not incorporate our suggestions to create the new section on "Sign language users" with sign language symbol that shows the respect of our cultural and language minority in Canada that Sign languages are basic human rights to get the full accessibility on communication and its services.

64. Also, on the accessibility services at Bell stores across Canada, CAD-ASC and DWCC noted that Bell offers sign language interpretation services through a request in the online form that the interpreting services must comes from the Canadian Hearing Society (CHS). CAD-ASC and DWCC brought this to the attention to Bell during the meeting that we are concerned because of the fact that CHS services are only provided in Ontario only. Bell was unaware that other Deaf people who reside in different provinces are not able to request the interpreting services for accessibility services at the Bell stores because CHS is not offered in these other provinces. It is clearly unfair to Deaf people who wants to get the interpreter services in their provinces since CHS is only provided in Ontario.

65. After the meeting CAD-ASC and DWCC made a document with a list of the contact information and websites of Sign language interpreting service agencies that are available in each of the other

provinces, which did still include CHS which provides services in the Province of Ontario. It was our strong recommendation that Bell Canada needs to update and correct on the information on their website to show that Sign language interpreters are available through other interpreting agencies in other provinces other than Ontario served by the Canadian Hearing Society.

66. To this date, Bell has not updated on the website to remove the CHS as the only sole provider for the interpreting services that means it does restricts the rights of the Deaf person's choice to obtain the services from the Sign language interpreting services in other provinces which Bell covers these accommodation costs. CAD-ASC and DWCC requests that Bell updates on the website that allows other interpreting agencies across the country that Deaf person can able to make the request through the online form.

67. DWCC et al are concerned that the Bell Accessibility Team has not hired a Deaf person to work with their team, it is our perspective that the expertise of a Deaf person with lived experience and knowledge is critical to improve accessibility services and its needs for Deaf people to use Bell's services.

68. DWCC et al commends Bell for establishing their accessibility@bell.ca email address while many other companies had not done this as DWCC et al recommends that many other companies should establish these email address soon as a possible.

69. Recommendations from the Bell Accessibility Meeting Experience:

- a. Incorporate a new section "Sign language users" in the Accessibility web page with a logo representing Sign language and consult with CAD-ASC and DWCC for the lists of the information that will be customized with our accessibility needs.
- b. Remove the information that CHS is the sole Sign language interpreting service provider for the country, when in fact CHS interpreting services provides only for those in Ontario. Having this information left on the website creates misleading information about Sign language interpretation services in other provinces across Canada. Bell must add the other Sign language interpreting agencies in other provinces so that Sign language interpreters are provided for for Deaf customers at Bell stores, choosing from the list of sign language interpreting agencies in the customers' specific region/province. CHS can still be left on the site for Ontario. The list was already provided to to the Bell accessibility team staff person.
- c. Produce ASL and LSQ videos that promote the Bell Accessibility plan and their accessibility services, including that interpreters can be provided upon request.
- d. Add a Deaf or hard of hearing Bell staff on their accessibility team to discuss and collaborate with us on wireless specific or overall accessibility issues.

SHAW

70. While DWCC was not officially invited to Shaw Accessibility meeting per se, in its DWCC role, the DWCC Chair, who is a Shaw customer, assisted in reaching out to get 3 local Shaw customers from the Vancouver community to show up at an accessibility meeting on **Wednesday May 10, 2017**. DWCC sent the chairperson who is a Shaw customer to give feedback and input on Shaw products and services. Overall the meeting was a positive interaction with some product demonstrations.

71. The chair was impressed with Shaw confirming they have listened and explained that they have broken away from third party provider to work on pursuing an IP Relay app for functional equivalency for deaf and hard of hearing customers. Shaw was supposed to include this customer (DWCC chair) in the beta testing but finds it surprising that Shaw has decided to stay rather with a person coming from a communication service provider rather than us with the DWCC for its IP Relay design phase. DWCC feels very disappointed in the way things have progressed in this regard. Shaw did not enlist

the DWCC and still has yet to reach out to us to help with beta testing of such an app provided by Shaw.

72. Overall, appearing as a Shaw customer, DWCC found Shaw staff were very good listeners and ask questions and approachable and the general feeling is they take what we say into real consideration, we feel valued and they do include people for the most part. The meeting experience was overall positive and the hands-on experience was greatly appreciated.

73. Recommendations from the Shaw Accessibility Service and Products Experience:

- a. Continue to be great listeners and conduct interactive discussions at consultative sessions
- b. Produce ASL and LSQ videos that promote the Freedom Mobile Accessibility plan and their accessibility services, including that interpreters can be provided upon request.
- c. If there is further beta testing of the IP Relay App still in development, to please reach out to DWCC et al for our participation.
- d. We do understand Shaw did massive layoffs earlier in 2018, but if it were possible, the last recommendation is to add a deaf or hard of hearing staff on their accessibility team and to join the next Shaw Accessibility meeting whether it be on wireless specific or overall accessibility issues to Shaw services and products.
- e. Create a one-stop e-mail address for accessibility issues - accessibility@shaw.ca

SUMMARY OF WIRELESS ACCESSIBILITY MEETINGS WITH CANADIAN WIRELESS AND TELECOMMUNICATIONS (CWTA):

ASL/English Meeting

74. On September 20, 2017, CWTA hosted a meeting in Ottawa, with a large group of wireless service providers and CWTA staff along with:

- Deaf Wireless Canada Consultative Committee (DWCC)
- Canadian Association of the Deaf - Association des Sourds du Canada (CAD-ASC)
- Canadian National Society of the Deaf-Blind (CNSDB)
- Canadian Hearing Society (CHS)
- Deafness Advocacy Association Nova Scotia (DAANS)
- Society of Deaf and Hard of Hearing Nova Scotians (SDHNS)

75. The Agenda was quite extensive, time was spent summarizing issues from our group to the wireless service providers, but the reality is there wasn't enough time, reviewing the agenda, we didn't get to discuss the accessibility plan as much as we would have liked. There was a sense of urgency to focus on the Wireless Code and Wireless terminology video production projects due to the deadlines imposed by the CRTC and that took priority over the rest of the agenda.

76. One piece of useful information that came out of the meeting's discussions of benefit to the DWCC et al is that we need to encourage members of our DDBHH groups to contact the wireless companies themselves direct if they really want to have Apple iOS Software TTY activated and usable in Canada on their iPhones. It is the companies that can turn the capability on. DWCC et al will do a vlog about this at some future date as it needs to be done in both ASL and LSQ.

77. After the meeting, DWCC et al concentrated on the collaboration effort with the CWTA for the Wireless Code video to be released by December 15, 2017. It was a successful collaboration, and everyone did joint press releases and shared the videos throughout all channels. Our group looks forward to the continued collaboration to get the terminology videos produced and distributed by June 2018.

78. The hope is at future meetings with CWTA the focus can be more on discussion about the accessible wireless plans and proposals how to make better price accessible data plans. Perhaps this next meeting can be arranged after all the videos are completed and finalized as warranted by TRP 2017-200.

French/LSQ Meeting

79. On December 4, 2017, CWTA hosted a meeting in Montreal, Quebec with group of the French-speaking and LSQ Francophone participants as follows:

- Association des Sourds du Canada-Canadian Association of the Deaf (ASC-CAD)
- Association du syndrome de Usher du Québec (ASUQ)
- Réseau québécois pour l'inclusion sociale des personnes sourdes et malentendantes (ReQIS)
- Bell
- Rogers
- Vidéotron
- Association canadienne des télécommunications sans fil (ACTS)

80. The Agenda was similar to the English/ASL meeting however this meeting was in contrast with the English/ASL meeting with most of the time spent discussing our perspectives on the accessibility plans for Deaf, Deaf-Blind and Hard of Hearing, Message Relay Services including IP Relay, and Text with 911, and the future technology on Real Time Text (RTT). The French/LSQ group was not able to discuss about the Wireless Code for LSQ videos along with ASL videos because the French/LSQ was not consulted properly due to the timing and scheduling issues with the due dates for release of the Wireless Code videos to the CRTC before December 15, 2017. The consultation for these videos on the Wireless Code was only done in the ASL/English meeting.

81. It would be recommended that future meetings with CWTA be organized with a merge of the French/LSQ with the English/ASL as one group meeting, all of the members together to discuss more about:

- a) the accessible wireless plans, company accessibility services,
- b) accessible stores, and customer service considerations
- c) Accessible company products and services information in LSQ and ASL videos
- d) Company accessible microsite website designs to include and add a new category of accessibility groups in an updated section on their website: "Sign language users" that has an icon graphic of sign language users because in reality, LSQ and ASL users do not identify or fit in with hearing or speech accessibility groups as are commonly indicated on company websites.

82. Recommendations from the CWTA Wireless Accessibility Committee Meeting Experiences:

- a. Continue to be great listeners and conduct interactive discussions at consultative sessions.
- b. Merge the English/ASL and French/LSQ groups into one annual in-person Wireless Accessibility meeting and have ASL and LSQ interpreting team assist in facilitating bilingual sign language communications and including spoken translations (English and French) to be available during meeting. Our groups have experienced this in other national level meetings, so we know this is possible.
- c. Consult on equal basis with the same time with the group of French/LSQ and the group of ASL/English Accessibility.
- d. Each company should send a Deaf, hard of hearing or deaf-blind staff person representative of their accessibility team to this meeting
- e. Next meeting, need more time to discuss, in order of importance:

- a. Wireless accessibility plan issues and challenges, as trends have changed compared to 2016.
- b. each company making their own ASL and LSQ videos describing their accessibility services
- c. Text with 9-1-1 registration concerns and problem-solving
- d. store and customer service accessibility ideas.

RESPONSES TO ACCESSIBILITY REPORTS AND RFI RESPONSES:

83. Please note that the responses below may not be as comprehensive as we thought just because we have already commented about something that was in a companies' report to the CRTC elsewhere in the document. In this section we will spend time writing providing our input and perspective about each of the companies' accessibility web pages.

ROGERS

a) ACCESSIBILITY WEBPAGE [LINK](#):

84. First of all, the header "*Hearing and Speech Solutions*" at the top of the page is an issue for two reasons:

- 1) The wording itself sounds like the company is trying to solve hearing and speech disabilities, which they can't, these are permanent disabilities, and for lack of words, rather in explicit terms, identity misrepresentation. This is why we suggest making a new category as described in the next point:
- 2) Deaf, Deaf-Blind and hard of hearing who identify as a cultural and linguistic minority would rather identify with the words "sign language users" as these are the people who would benefit from the company accessibility plans with their data-intensive video communications.

85. The second observation is that the ordering of the topics on the web page should be moved around, because we know that most people from our group will be going straight to look for the Accessibility Plan, and currently the website visitor has to scroll down the page through 3 sections: Text with 9-1-1, Closed captioning, Message Relay Services before finally reaching the information about Wireless Plans and Add-ons. Many people have given up and reached out to members of our Deaf community trying to find the information. Based on our experiences, it is our recommendation for the ordering of the information to start at the top with Accessibility Plan information, Text with 9-1-1 and Message Relay Services then follow to end the page with Closed captioning which is the order of priorities to our accessibility groups.

86. The third recommendation is that the Accessibility Plan information should be clickable to be available on its own webpage by itself so that one page with the Accessibility Plan information can be printed off and brought to the store. DWCC et al often receives accounts from Deaf, Deaf-Blind and hard of hearing customers experiences describing staff not knowing and not aware of the company's own Accessibility Plan and essentially denying customers the discounts or packages.

b) ACCESSIBILITY PLAN

87. In the beginning, Rogers had a table chart that was so complex and people of the accessibility groups had difficulty trying to figure out the costs for the amount of GB they wanted, DWCC et al commends Rogers for making it simpler and following the example of Telus Accessibility discount.

88. The wording is great: "*If you are Deaf, Deaf-Blind or Hard of Hearing and do not require standard Rogers voice service, or if you are Blind, Deaf-Blind or have a physical disability and rely on wireless*

applications to help you access helpful navigation tools, you may be eligible for a discounted wireless service plan. Rogers offers a \$20 discount on any of our consumer in-market Share Everything plans which include Data Manager, Roam Like Home, NHL Game Centre Live as well as unlimited access to Canada's "SRV Canada VRS" Video Relay Service. "

89. DWCC et al really appreciates the "unlimited access to Canada's SRV Canada VRS" on these wireless plans, that is exactly how it should be. This is accurate functional equivalency for Canadian ASL and LSQ sign language users.

90. However, it is our observation since December 2017 that in reality the established \$20.00 discount does not work for the currently heavy data user, for example, at 12-15 GB / monthly who may have a shared plan with a total including taxes nearing over \$200.00. There is no benefit to this heavy data user group as they are still paying nearly \$200.00 anyway. More about this later in the section about the promotions for \$60.00 for 10GB in this document.

91. One thing we saw on the Accessibility web page is that *"for an extra \$7 per month, get text and audio versions of your voicemail messages delivered to your device via text message."* It is DWCC et al view that this is rather unfair. Why should a disabled person have to pay so much for a service that they require which is not their fault as a person with accessibility needs, for them it would rather be an essential service than a premium service as described. Hearing people should pay for this service as these may be considered "extra" or premium. Customers from accessibility groups, should be able to receive this essential service at a very low cost or better yet, free of charge. DWCC et al views this an example of wireless customers taking advantage of the customers here.

92. These above are good examples of discussion points that should have taken place in the consultative meetings but were not covered or discussed. Another topic around accessibilities that should have been covered in the meeting follows:

c) IN-STORE SIGN LANGUAGE INTERPRETATION

93. Further to "14. Further, Rogers' retail locations are designed to meet accessibility standards To further enhance the customer experience for customers who are deaf or hard-of-hearing, Rogers recently launched in-store sign-language interpretation support. Upon request, customers can now arrange an in-store appointment at any corporate retail location in advance and have a sign-language interpreter on site to translate their interaction. This service is offered at no additional cost to Rogers' customers. "

94. DWCC et al wishes to ask what Rogers has done to promote this information about sign-language interpreters to the Deaf community. Fact is, companies such as Rogers cannot entirely depend on groups like ours with such low budgets to inform our communities to inform our communities, as videos must be available in LSQ as well as ASL. Rogers, like all the other companies, needs to take responsibility to undertake video productions promoting their services in ASL and LSQ that can be used to inform current and potential customers that they can request sign language interpreters.

95. DWCC et al recommend Rogers, and all wireless companies, to decide on multiple high traffic locations depending on the geography and pick specific dates and times that several options of accessibility are available and provided:

- 1) Sign language interpreters
- 2) Video Remote Interpreting
- 3) Signing staff (preferably staff persons who are Deaf, HH or DB) are on shift.

96. The suggestion is to pick regular days and times, with more than one option per week at these designated stores and publicly advertise (preferably in ASL and LSQ videos) with information about

these time slots and have these locations become an accessibility flagship store. Such an example of an accessibility services and products “hub” would be Metrotown Rogers store that is on the 2nd floor near the Skytrain entrance as the optimal location with the least travel distance from the Skytrain for those with physical disabilities.

d) HUMAN RESOURCES

97. *“Rogers has taken a significant step forward in informing our Human Resources department to ensure that people with disabilities can find sustainable and comfortable employment within the organization. This initiative, in turn, helps to shape the internal expertise of our employees who participate in the Ambassador Program”*

98. In the group’s joint view, this is a great initiative by Rogers, however we comment on two points, the DWCC et al would appreciate to be able to assist in sharing the job positions for positions within Rogers across our groups, to our own Deaf community members and among accessibility groups. Secondly, we would like to see increased visibility of the people of accessibility groups who are on Rogers staff, also appearing at the accessibility meetings to meet with groups like ours for consultation, and not hidden behind the lines or in lower level staffing. This is not a comment only for Rogers but applies for all the companies.

TELUS

a) ACCESSIBILITY PLAN/ACCESSIBILITY WEBPAGE [LINK](#):

99. The landing page for the wide range of accessibility services is appreciated, Telus wins in that it provides the most information about its accessibility services on its website, however what is missing is ASL and LSQ videos describing some highlighted accessibility services provided by TELUS, ie. the accessible wireless plans. The website microsite landing is nice and simple and gives people a choice where to go for further information, however when clicked to enter and landing on Rate plans, the type of rate plans, we would suggest that the wireless plan be on the top of the page.

100. The wording is great: *“If you are Deaf, Deaf-Blind or Hard of Hearing and do not require standard TELUS voice service, or if you are Blind or Deaf-Blind and rely on mobile applications to determine your location, you may be eligible for a discounted mobile service plan.*

TELUS offers a \$20 discount on TELUS Your Choice plans which include unlimited access to Canada’s [“SRV Canada VRS”](#) Video Relay Service. To learn more, contact one of our client care representatives at 1-866-558-2273. If you use a Teletypewriter (TTY), TELUS Relay Service is available 24 hours a day, 7 days a week by dialing 711. More information on TELUS Relay Service is available [here](#).”

101. DWCC et al really appreciates the “unlimited access to Canada’s SRV Canada VRS” on these wireless plans, that is exactly how it should be. This is accurate functional equivalency for Canadian ASL and LSQ sign language users. More about DWCC et al’s view on this can be read [here](#).

102. However, it is our observation since December 2017 that in reality the established \$20.00 discount does not work for the currently heavy data user, for example, at 12-15GB/monthly who may have a shared plan with a total including taxes paying nearing over \$200.00 monthly. There is no benefit to this heavy data user group as they are still paying nearly \$200.00 even with an accessibility discount. More about this issue to be reviewed later in the section about the promotions for \$60.00 for 10GB in this document.

103. Secondly, it is our recommendation that a designated email address for accessibility issues be established based on our experiences from last December.

b) IN-STORE SIGN LANGUAGE INTERPRETATION

104. DWCC et al went looking for information about this, as they recalled it was on TELUS website somewhere, that sign language interpretation was available upon request for in-store visits, however and did not see any mention of this in the reporting. If this is available, it should be on the website just as it states it does on the ROGERS site.

105. As we previously mentioned for Rogers, DWCC et al wishes to ask what TELUS has done to promote this information about in-store sign-language interpreters to the Deaf community. Fact is, companies such as TELUS cannot entirely depend on groups like ours with such low budgets to inform our communities, as videos must be available in LSQ as well as ASL. TELUS, like all the other companies, needs to take responsibility to undertake video productions promoting their services in ASL and LSQ that can be used to inform current and potential customers that they can request sign language interpreters in stores and the options for this communication.

106. DWCC et al is very pleased with TELUS determined effort to create Accessibility centres of excellence starting with the one in Toronto and look forward to further updates regarding this project and venture. DWCC and CAD-ASC did our part to refer TELUS locals to participate in this venture. We have heard positive feedback from those who have participated.

BELL

a) ACCESSIBILITY WEBPAGE [LINK](#):

107. As previously mentioned earlier in this document, when you access the webpage, and you scroll to the bottom of the accessibility page, there are 5 physical abilities listed: Physical, Speech, Cognitive, Vision and Hearing. Services and features can be found in each, along with Accessibility Help Centre as 6th option. DWCC et al recommends that a new category be added: "Sign language users" with sign language logo, which refers to the data-heavy wireless users for video communications with two hands as the symbol. To this date, Bell did not incorporate our suggestions to create the new section on "Sign language users"

108. To this date, Bell did not incorporate our suggestions in the meeting to create this new section on "Sign language users" with sign language symbol that shows the respect of our cultural and language minority in Canada. For our accessibility group, sign languages are basic human rights to get the full accessibility on communication and its services.

b) ACCESSIBILITY PLAN

109. While Bell wins in that it has a stand-alone webpage with the Accessibility Plan information which makes it handy for customers to print and bring to the store, where it states the company is offering 2 free GB as an incentive for Deaf, Deaf-Blind and Hard of Hearing customers does not bring a competitive edge or benefit to DDBHH Bell customers. This would explain why there is such a low number of Bell Mobility customers out of our random survey group of 51 respondents. The accessibility plan with 2 free GB as data added still is considered "too expensive" and does not quite accommodate our accessibility groups' needs.

110. It is DWCC and CAD-ASC's suggestion and recommendation that Bell go back to their sales team and discuss a better cost scheme Accessibility plan that will benefit our accessibility group for the data-heavy video communication customer.

c) IN-STORE SIGN LANGUAGE INTERPRETATION

111. Please see comments made in the Accessibility consultation meetings earlier in the document about the provisions of interpreting services information on the website.

d) ASL AND LSQ VIDEOS

112. DWCC et al confirms that Bell is leading in inclusiveness by being the first company to make an effort to produce ASL and LSQ videos about its accessibility services and products. DWCC et al commend them on this effort.

113. DWCC and CAD-ASC still remain open and willing to meet again with Bell.

SHAW & FREEDOM MOBILE

a) ACCESSIBILITY WEBPAGE [LINK](#):

114. On the webpage, it says "Hearing solutions" then an icon of line crossing ear indicating hearing disability. While it is well-intended, it does not apply to the sign language community. DWCC et al recommends an icon of 2 hands indicating sign language and for an example, to reference Sign language users instead of "Hearing solutions," especially when Shaw currently has 3 ASL videos right below. The effort in producing your own ASL videos is a nice forethought for our pool of customers, DWCC et al really appreciated this effort, however DWCC et al has some feedback about the videos themselves and however, it can be sent directly to Shaw, one being that the person in the video is small in scale, leading to some signing hard to read, it would have been better if the person was a bit bigger in size, and the videos sent to our group for our input in the editing phase before they were publicized.

115. With the ear-slash "Hearing solutions" represents the point of view (POV) of society looking at Deaf customers' ears instead of accepting us as a cultural and linguistic minority with sign language (either ASL or LSQ) as the primary language of use. Deaf community gives the permission to call us "Deaf", "Deaf-Blind" or "Hard of Hearing" so we prefer that, instead of having "solutions for our loss of hearing."

b) IP RELAY APP

116. DWCC et al commends Shaw on its efforts to break away, listen to the consumers and be initiators and innovators, and proceed to investigate options on development of an app to download and easily access IP Relay Services. DWCC et al greatly appreciates and values this. If there are any Accessibility awards in telecommunications, our choice of recipient at this time would be Shaw for this very reason. This shows the company is willing to listen to its customers and we are thankful.

c) FREEDOM MOBILE ACCESSIBILITY PLAN

117. From the RFI letter dated 19 February 2018 Freedom Mobile states this: "Freedom offers three wireless service packages that include high data levels and unlimited text that would meet the needs of consumers who are Deaf, blind, Deaf-Blind, hard of hearing, rely primarily on video as a means of communication or utilize GPS apps for daily navigation. All three of the service offerings described below would generally meet or exceed the data usage requirements of these consumers without requiring them to pay for the voice services they do not necessarily want. Voice services are enabled as part of the service offering but are charged at a per minute rate, if used."

118. At this time Freedom's website now has the following information.

"Accessibility Plan (text and data only) for the deaf, deafened, or hard of hearing

Freedom Mobile offers a text and data plan for deaf, deafened, or hard of hearing persons . A customer may activate on Freedom Mobile's [Internet plan](#), and add a the text feature by [contacting](#) the Freedom Mobile Care team. The text addition allows for unlimited texting in Canada and the USA from anywhere in Freedom Mobile's Home network. An active wireless subscription is required to have this service. The wireless user account (prepaid or postpaid) must remain in good standing at all times in order to remain eligible for this plan and text feature.

Accessibility Plan Details (Mobile Internet Plan + Text)

Home Network

- 10GB of full-speed data (3G/HSPA+)
- Unlimited text to Canada and the U.S.

No Hidden Fees, System Access Fees, 911 Fees or Activation Fees.

Use your features anywhere on our home network.

Add an additional 3GB of full-speed data for \$10/mo."

119. To reflect on our meeting experience with Freedom Mobile, DWCC et al really liked the plan offered by Freedom with 10GB the best out of all of the companies as that would definitely meet the needs of our accessibility group however we were and remain concerned about the 3G and not 4G/LTE speeds required for our video communications by our consumer group, and the iPhone challenges.

EASTLINK

a) ACCESSIBILITY WEBPAGE [LINK](#):

120. You have to enter the Accessibility Pages by going to the footer of the website, "Accessibility Services" the same as all the other companies, our first question is why it is falling under the header "Corporate?"

121. The landing page to Accessibility Services is straightforward. Clicking '[Click here for Accessibility Services information for Wireless Phone](#)': All accessibility options for Vision and Hearing are listed together, may we recommend adding another category as "Sign Language users - ASL and LSQ" as a category to click to for more information.

122. The suggestion is to re-arrange the topics on the webpage, as Wireless Rate packages should be at the top of the page then Text with 9-1-1 to follow.

b) Eastlink Accessibility Plans for DDBHH community

123. Bravo to Eastlink, they have the right concept of what DWCC et al was seeking - 3 standard accessibility package offerings, however with the current data package consumption levels, higher data package offerings would be beneficial, as truthfully, 1-3 GB with data is not going to meet the needs of video communication which are data-heavy users:

\$50 1 GB of Data with Unlimited Text + 300 Minutes
\$60 2 GB of Data with Unlimited Text + 300 Minutes
\$70 3 GB of Data with Unlimited Text + 300 Minutes

c) Eastlink Accessibility Responses

124. This is a response to the letter written to CRTC by Eastlink on [July 11, 2017](#):

Eastlink's support for accessibility initiatives is clearly stated in the first sentence as noted:

*"Eastlink supports initiatives to ensure **access** to our services by **all consumers**."*

125. Eastlink explains while it is a small carrier which prevents them from “driving innovation from equipment manufacturers or suppliers on whom we rely for accessible equipment, devices or other technology.”, they still support initiatives and advancements in technology that result in improved services. Eastlink explained that larger carriers, including those outside of Canada with larger consumer base would take the lead to develop better accessible devices. Also, Eastlink says:

*“We offer consumers and **unlimited data** option in some of our internet plans as well, without plans also including generous data allowances where they are not unlimited.”*

126. DWCC et al is pleased with Eastlink’s stance on accessibility and being a small carrier is understandable and your support is appreciated. Our groups will continue to seek better technology options available by companies in other countries, such as the IP Relay App from Sprint Relay for instance. This detailed [supplementary document](#) was submitted on August 29th, 2017, and DWCC et al has yet to hear support from larger carriers such as Telus, Bell or Rogers, *even though* the technology is already available and ready to use. Our perspective is everybody seems to be waiting for the resulting policy coming out of the proceeding TNC 2017-33.

COGECO

127. Cogeco’s [Accessibility page](#) is clear and concise. However it is missing ASL and LSQ videos for its DDBHH customers. Customers cannot tell from this webpage if Cogeco will provide sign language interpreters (with sufficient advance notice) to facilitate communication between its retail store staff and DDBHH customers.

128. Cogeco should establish an email address such as accessibility@cogeco.ca to receive and answer comments from its DDBHH customers.

129. DWCC et al acknowledges that Cogeco is both an ISP and BDU but not a WSP. Any comments about mobile devices, voice / data plans and wireless accessibility plans are outside the scope of this discussion.

VIDÉOTRON (QUEBECOR)

a) ACCESSIBILITY WEBPAGE [LINK](#):

130. On the webpage, there is a menu on the right side, the first item says: ‘Vidéotron Accessibility’ which is a great start, then next 5 items have the word ‘impairment’ in them. Impairment means lack or loss of something and that does not settle well within the Deaf, Deaf-Blind and Hard of Hearing community. We prefer to be called by our identity as Deaf, Deaf-Blind or Hard of Hearing and recognized as a linguistic and cultural minority with our primary languages as LSQ and ASL.

b) ACCESSIBILITY PLAN

131. From the RFI letter dated 19 February 2018, here is the English translation of what Vidéotron has to offer for Canadians with disabilities:

“Vidéotron offers a fully adapted mobile wireless accessibility plan only available for customers people who are deaf or hard of hearing, and people with visual impairments.

This Accessibility Package includes:

- 8 GB of data;
- Unlimited calls anywhere in Canada;
- Unlimited text messaging;

- Calls to 9-1-1 emergency services;
- Text 9-1-1 (following registration in the service);
- The ability to connect a TTY device.

132. Accessibility package price is \$ 64.95 / month. Vidéotron, however, chose to situate this package in the "Premium" category - a category usually reserved for packages of at least \$ 88.00 / month. This allows to promote access for Canadians with disabilities to "premium" devices, ie high-end phones like the latest Apple iPhones or Samsung's latest Galaxy devices. These devices offer a more wide variety of accessibility options than lower category devices. So, depending on the device selected, this can be obtained at no cost or at a lower price. On the other hand, package subscribers Videotron Accessibility may benefit from an additional monthly rebate of \$10 if they already have their own device.

133. The Vidéotron Accessibility plan is in line with the requests expressed by the various groups of Canadians with disabilities, including access to affordable data blocks. On this subject, it states in its report on wireless services that 8 GB data block is an average usage for a person using video relay services (VRS). On the other hand, average usage for people who do not use VRS and / or who use other visual communication applications such as FaceTime, Glide, Skype, Messenger and other services video, is usually 6 GB.

134. On the other hand, although some Canadians with disabilities use it very little or not at all, Vidéotron chose to include the voice service in its Accessibility package in order not to penalize a disabled person who would still like to use a voice service. As specified above, this service is offered at no charge additional and allows the subscriber or the person using the device to make unlimited calls anywhere in Canada."

135. DWCC et al appreciates Videotron's efforts to establish a standardized wireless accessibility data package which is what one of our goals was for the companies to provide. For information purposes, 8GB is potentially the standard minimum of GB data usage by a video communication LSQ or ASL wireless customer. It is our hope to confirm this with a new survey in TNC 2018-98, that is if CRTC will permit us.

136. DWCC et al understands Videotron's position on not eliminating voice service in its accessibility package in order not to penalize a disabled person who would still like to use a voice service. Really, it's up to the consumer whether they want voice minutes or not. In emergency situations, SRV Canada VRS can be used to reach a Deaf caller. A Deaf person who uses sign language and does not speak would not be able to answer a ringing call so having a voice package could be considered frivolous.

INTERNAL SURVEY RESULT CATEGORIZED

137. To prepare for this report, the DWCC et al decided to do an impromptu survey of its 26 ASL and LSQ members with an English and French-only survey. The goal was to have a limited number of people doing the survey, sending out the two-survey links to DWCC members, as well as CAD-ASC Board Directors, some frequently communicated with individuals, ie. contractors, such as ASL or LSQ interpreters, or the film crews. When we saw that we needed more responses from the French side one member of DWCC sent the french link to a random number of french Deaf community members and got the number of surveys up to par to the English number of respondents. A total of 51 respondents participated, 25 English, and 26 French.

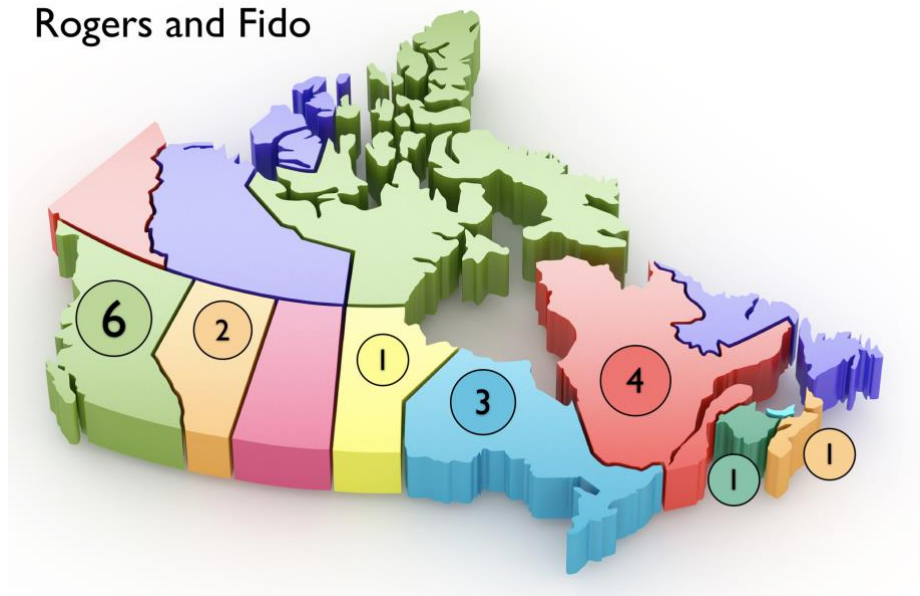
138. Appendix A lists the 15 questions in both English and French. In the spirit of transparency not a lot of time was spent on the careful wording or structure of the survey as we just wanted a small sample in order that CRTC and interested parties would have a small snapshot of the current status of DDBHH wireless and internet company customers.

a) **Wireless & Text with 911:**

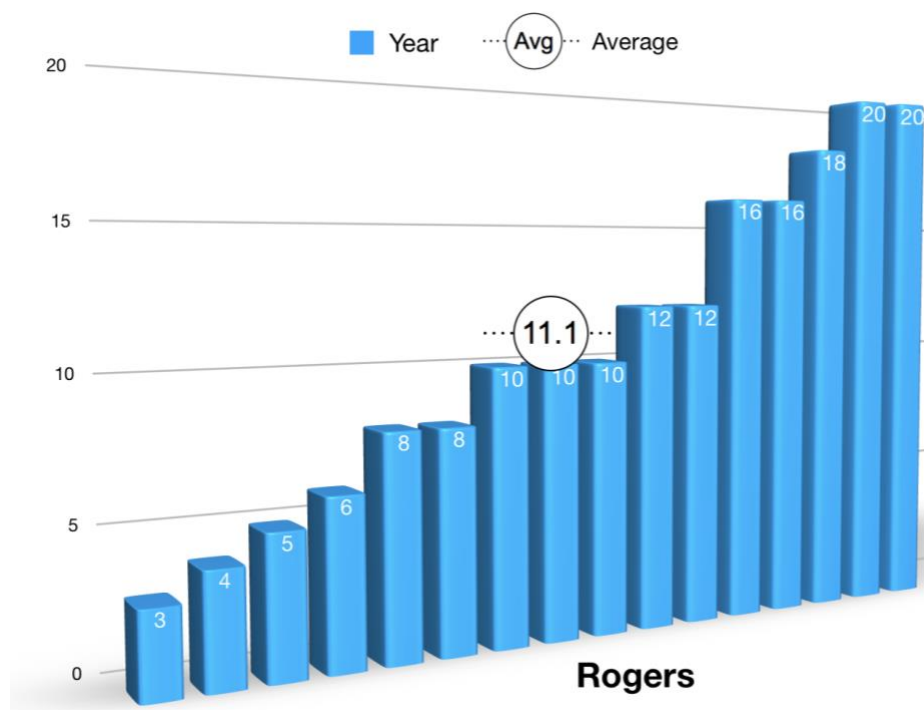
i) **Rogers Wireless and Fido**

Of the 51 respondents, 16 were Rogers Wireless customers and 2 were Fido customers. Here is a graphic that shows the locations of these total 18 customers in a visual graphic:

Rogers and Fido

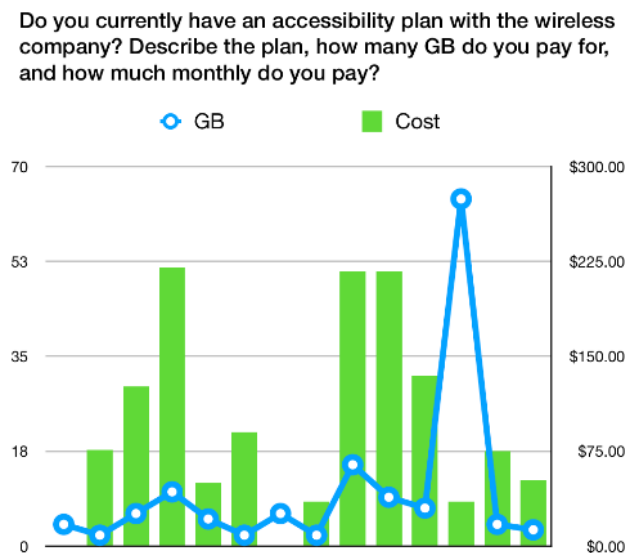


139. Rogers has the highest number of years a wireless customer is loyal to, with one customer being with Rogers Wireless for over 20 years, since 1988 and the newest customer has been with Rogers for 3 years. The average number of years a customer has been with Rogers Wireless was 11.1 with a total of 16 customers.



140. The majority do not have an Accessibility plan, with only two people we counted had an accessibility plan for Rogers. As for number or total of gigabytes of a data plan that the respondents had, the most GB of data the customer was paying for in a month was 15GB. The lowest number of GB paying for was 2GB. The average among 17 respondents came to 9.4 GB. And the average the person was paying for this 9.4GB was \$102.17/month.

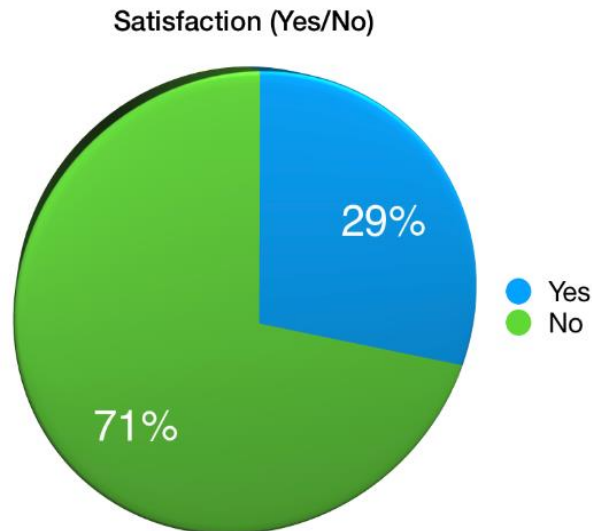
141. The whopper was the pricing versus the GB data monthly comparison, some people are really paying too much versus the data package, there doesn't seem to be proportionate data illustrated in the graphic summarizing the data packages (GB) vs.the costs. Some people are paying too much for such little GB data allowances. Overall, our take is that Rogers truly doesn't show consistency with its accessibility packages and this is very clear and prevalent in the following graphic:



142. Sample of text narratives supplementing the response:

- “No. It is a standard plan with 4GB monthly data, and voice cannot be removed or minimized with a proportionate reduction in price. I cannot add more data to support VRS and other visual communication services without paying the standard premium price.”
- “The Rogers Plan that was arranged by GVAD, which we signed up for in 2014: unlimited texts within Canada and the US, 2 GB data = \$35.00 each device (before taxes). It's the same to this day.. with taxes, it comes to about \$81.00 for both our devices (separate numbers).”

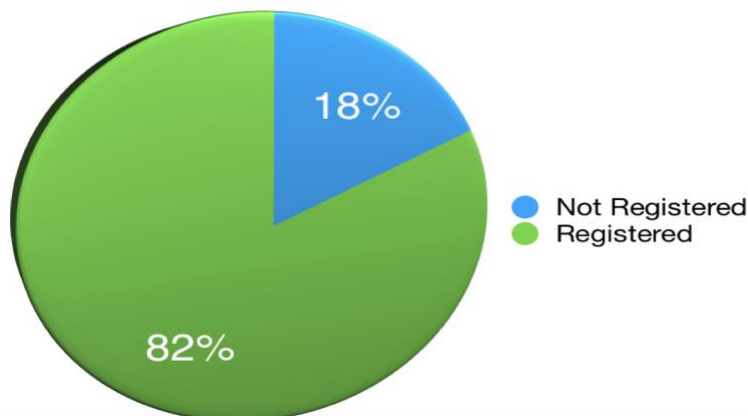
143. DWCC et al asked respondents if they were satisfied with their accessibility plan or what they were paying for, and here are the results - 71% are not satisfied, with 29% as satisfied. The graph illustrating this can be viewed on the next page.



144. An interpretation of this is that even with the current \$20.00 off accessibility plan, it just won't work for the highest data subscribing customer of Rogers, as they have subscribed the greatest number of gigabytes, at 15GB, with a \$20.00 discount of what they are paying for this, at \$217, they still have to pay close to \$200.00 for 15GB. Thus, the \$20.00 accessibility discount doesn't really work in that it doesn't go far for the most used amounts of data monthly and does not provide an attractive accessibility accommodation.

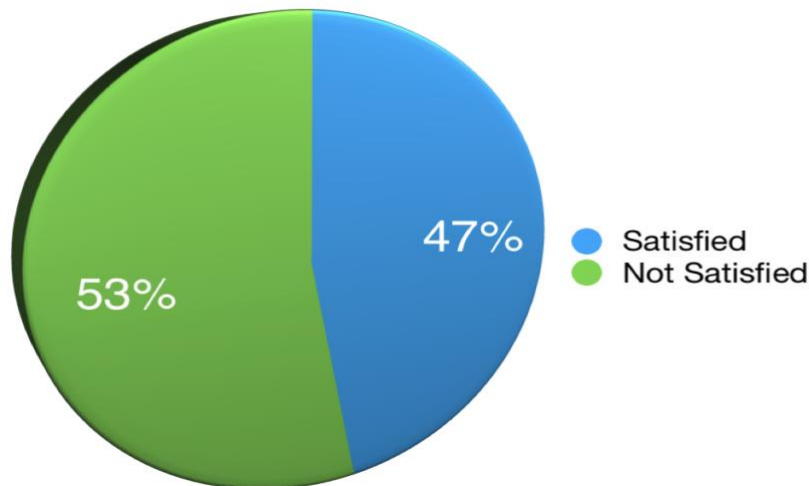
145. The good news is a majority are registered for Text with 9-1-1 through their wireless subscription with Rogers Wireless, with 82% as registered, and 18% not registered as seen in this summary graphic:

Are you registered with Text with 9-1-1 with your wireless company?



146. Since it was a wireless accessibility feature, DWCC et al felt it important to check in about each of the wireless companies' registration process for Text with 9-1-1. For Rogers Wireless, as the graphic chart on the next page indicates, it seems to be that slightly more customers are unsatisfied. DWCC et al gathered comments for clarity, please see a sampling of the comments after the graphic illustrating the result from the Rogers Text with 9-1-1 Registration process on the next page.

Was Text with 9-1-1 registration satisfactory (easy or hard)?



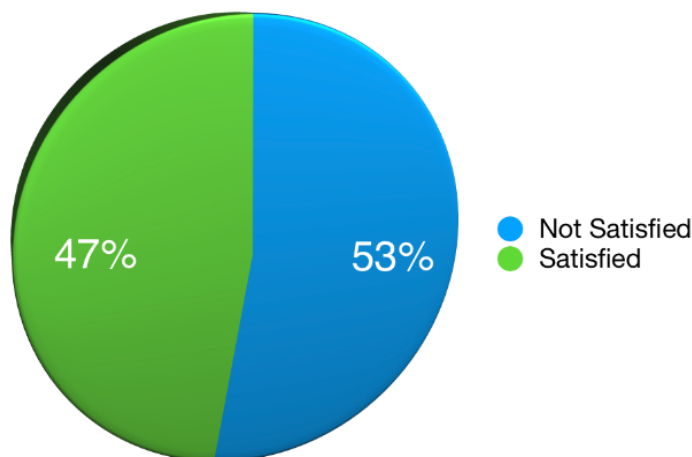
147. This means that the process for Text with 9-1-1 seems to be unclear for Rogers customers or there is a lack of awareness and understanding of registration steps.

Sample of text narratives supplementing the response:

- "I needed help to register, even with the step by step instructions"
- "Wasn't able to register online as I insisted. It took Rogers more than eight months to get the online fix and able to register online."
- "I tried to register it at two times. But I did not receive confirmation by online. I checked at Rogers' store and he checked and replied me that I have 9-1-1 registration. I know that I cannot test it yet."

148. We also wanted to know if the Text with 9-1-1 service was meeting our consumer groups' expectations and experiences, and this is what they said about the Text with 9-1-1 service coming from Rogers customers with 53% of customers "not satisfied" while 47% were satisfied. It varies from person to person of Rogers customers.

**Text with 9-1-1 was the service satisfactory?
(Did you use it and successful emergency services came)**



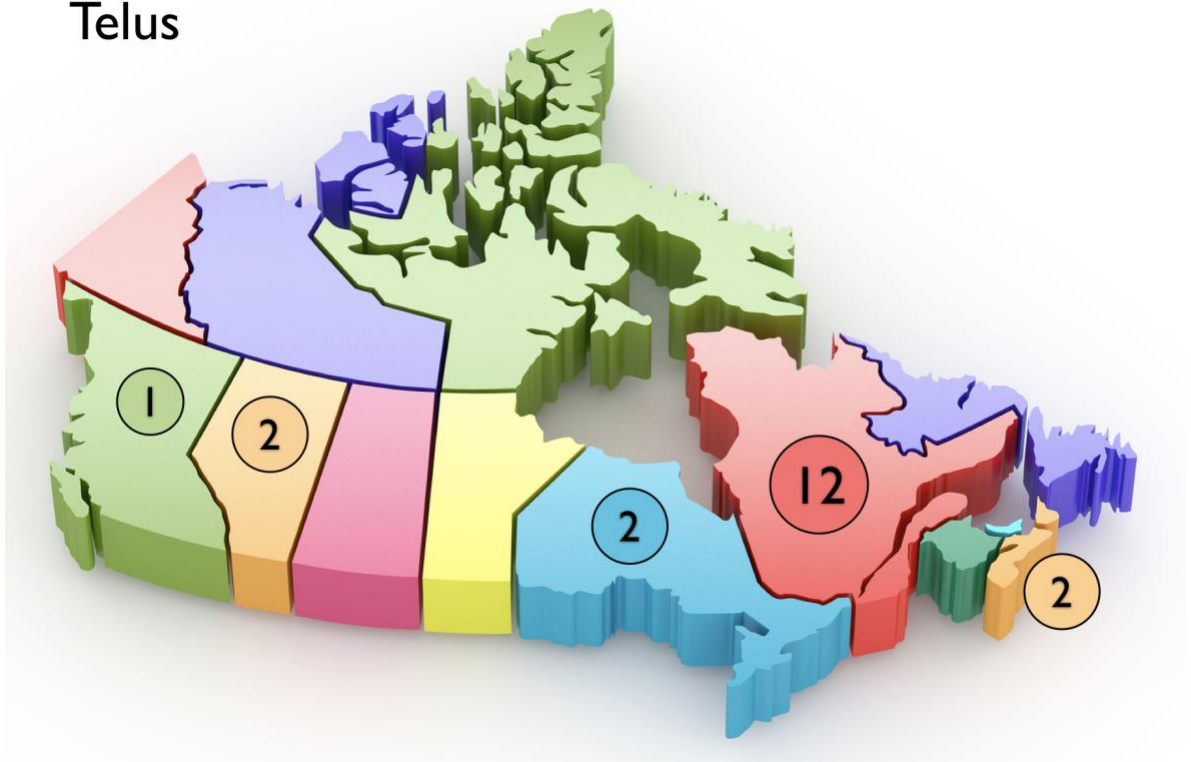
149. Sample of text narratives supplementing the response regarding service satisfaction:

- “When it is turn to emergency as I waited for about 5 or 6 min waiting for then to reply back, I am not satisfied so our conversation should be fast, not slow for the to reply back...”
- “Can’t access it properly because of no voice plan.”
- “I’m not satisfied with Text with 9-1-1. It happened at my friend house over the weekend at Ottawa. Two in the morning elder husband woke me up and need help with his wife as she couldn’t able to get up as she was stuck on the floor in her bedroom. I checked her status and realized that she could not get up. I use iPhone Rogers to call 9-1-1 and wait for two minutes. No text messages. I hang up my iPhone. I use their home phone landline and use their TTY. I dial 9-1-1 wait for the 911 dispatcher to respond. Press TTY tone to send voice to notify "This caller using TTY." No reply back yet for two minutes. I hang up the phone. Then I try the second attempt with Text with 9-1-1 again. No text message back after two minutes. I hang up iPhone. I went back to Landline phone to make the second attempt call 9-1-1 with TTY. Waiting for the 911 dispatcher to respond back with TTY for two minutes. Nothing! I hang up the phone again. Then I try the third attempt with Text with 9-1-1 again. No text message back after two minutes. I hang up iPhone nonetheless. I went back to Landline phone to make the third attempt call 9-1-1 with TTY. Waiting for the 911 dispatcher to respond back with TTY for two minutes. Nothing! I hang up the phone again. Then I try the fourth attempt with Text with 9-1-1 again. No text message back after two minutes. I hang up iPhone anyway. I went back to Landline phone to make the fourth attempt call 9-1-1 with TTY. Waiting for the 911 dispatcher to respond back with TTY for two minutes. Nothing! I hang up the phone again. Then I try the fifth attempt with Text with 9-1-1 again. Almost two minutes are waiting for text message back. Finally, 911 dispatcher send a text message back. I reply back to a text message to request EMT and ambulance. The 911 dispatcher confirmed text message then I hang up iPhone. I wait for EMT and ambulance. Both EMT and ambulance haven’t arrived. Ten minutes later, Ottawa Police officers arrived instead. I show Ottawa Police officers with my iPhone text message. They read and realized that 911 dispatcher didn’t send EMT and ambulance out. One of Police officer made requested thru CB 911 dispatcher to send EMT and ambulance out. We wait for another 15 minutes for EMT and ambulance. I just knew it would happen. I was right all long that Text with 911 isn’t safe for us at all. It took me thru 50 minutes to get the fifth Text with 911 text message back. It took me an hour and fifteen minutes for both EMT and ambulance arrived to get help. CRTC and ESWG screwed us and jeopardized for not the following Text to 911 protocol that was made by DDBHHSI’s decision-making. FCC approved it.”

ii) **Telus Mobility and Koodo**

150. Of the 51 respondents, 19 were Telus customers. A majority (ten) of these Telus survey respondents live in Quebec as shown in the map below.

Telus



151. Since Telus promoted its Accessibility Plans, DWCC et al observed a number of DDBHH wireless customers switching from Rogers to Telus. This indicates the importance and the attractiveness of well-priced and well thought out Accessibility Plans to the DDBHH.

152. The number of years the 19 surveyed Telus respondents had been with Telus ranged from one year to 17 years with an average of 8 years.

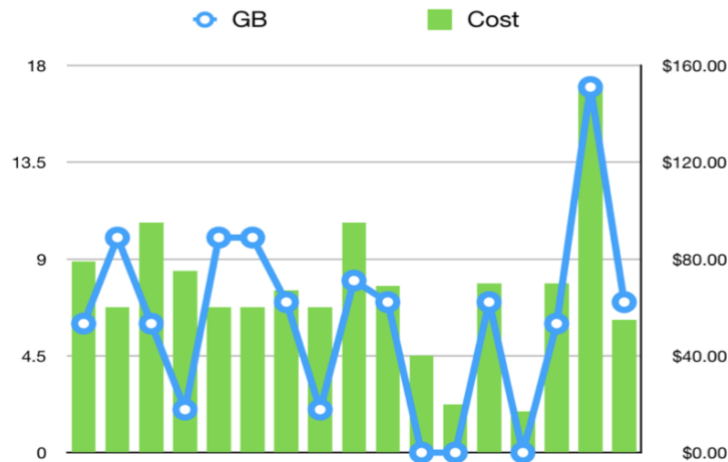
153. Of the 19 Telus survey respondents, 3 did not have any data plans and 14 respondents reported having a range of 2 GB per month to 17 GB per month with an average of 7.5 GB per month. As an aside, the remaining 2 surveyed Telus respondents did not describe their data plans are are excluded from this data plan discussion.

154. Costs borne by these 14 Telus survey respondents with data plans varied from \$60 for 2 GB / month to \$150 for 17 GB / month for an average of \$76.07 per month.

155. Only 9 out of the 19 Telus survey respondents had Accessibility discounts.

156. These numbers show Telus as another company with a huge disparity in prices associated with various data plan sizes where Telus customers pay more for lower monthly data allowances.

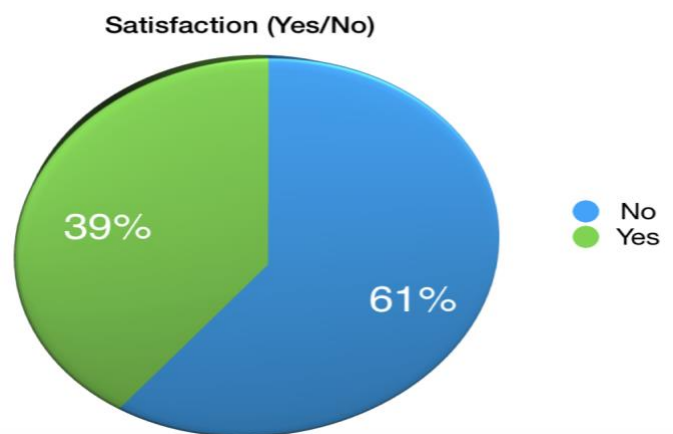
Do you currently have an accessibility plan with the wireless company?
Describe the plan, how many GB do you pay for, and how much monthly do you pay?



157. Some text narratives supplementing our discussion on Telus data plans and accessibility plans follow:

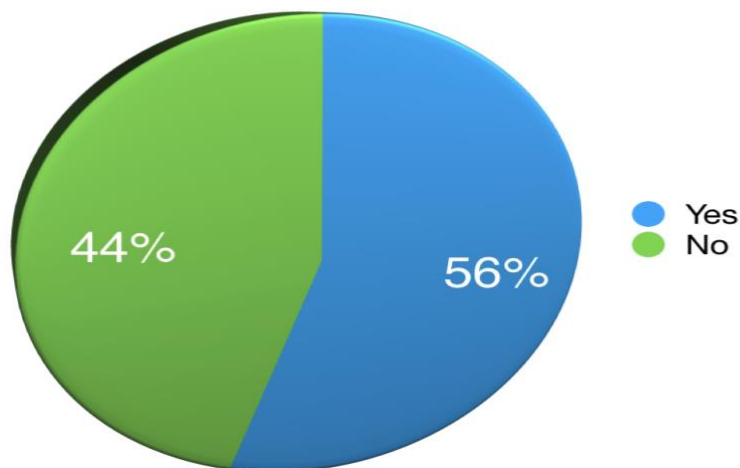
- “Telus offers 10 GB for \$60 to hearing people too. I still also hear from a lot of hearing people that they have a better plan than 10 GB. I get down to about 75% of my monthly data by third week and have to close access to data on a number of apps and monitor my data. Have not gotten around to talking to Telus about the 10 GB because I'm waiting to see if something better comes along.”
- “Text 9-1-1 fee is \$5/month visual voicemail is \$2/month and minutes plan is required at \$55/month. Eliminating the minute plan & costs for the other two items would make it truly accessible.”
- “If the companies could afford to have that flash sale of high number of GB for low cost of money why can't all d/Deaf people have access to that on a normal day.”
- “Don't have accessibility plan. None has reasonable pricing in Nova Scotia when comparing to Ontario and Manitoba.”
- “Lack of a deaf plan”
- “Parce que l'autre sourd qui est membre à la même compagnie que moi, avait réussi à obtenir le rabais de 35\$, pas moi qui 20\$. Le rabais de 15\$ pour personnes sourdes et malentendants. Le rabais de 20\$ pour l'accessibilité.. //
- “Because the other deaf who is a member of the same company as me, had managed to get the \$ 35 rebate, not me that \$ 20. The \$ 15 discount for deaf and hard of hearing people. The \$ 20 rebate for accessibility.”

158. When asked about wireless plans and accessibility plans, 61% of our surveyed Telus subscribers were not satisfied with their packages and their pricing, as seen in the graph on the next page:



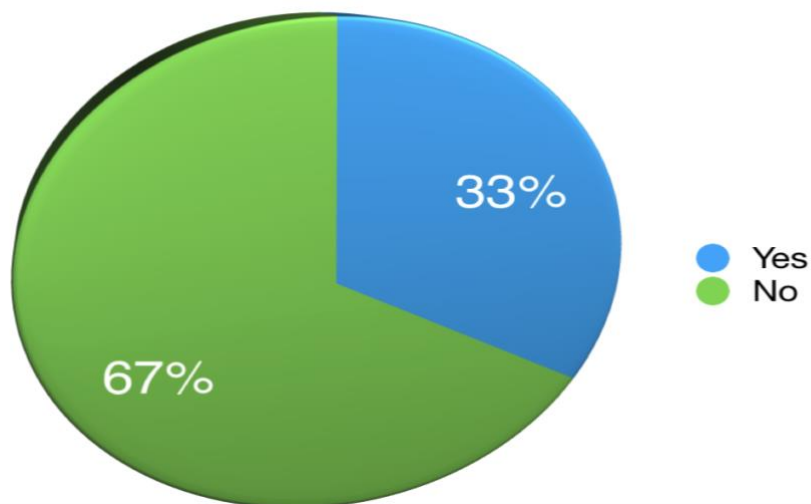
159. As shown in the graph below, a slight majority - 56% of the surveyed Telus subscribers registered for Text with 9-1-1 through their wireless subscription.

Are you registered with Text with 9-1-1 with your wireless company?



160. As shown in the graph below, 67% of the surveyed Telus wireless subscribers were not satisfied with the Text with 9-1-1 registration process.

Was Text with 9-1-1 registration satisfactory (easy or hard)?

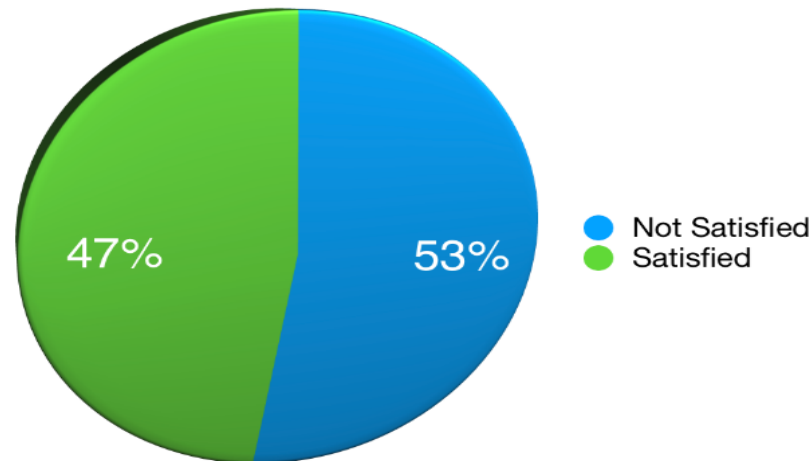


161. Sample of text narratives supplementing the response:

- "Didn't use it because non-voice plan block of it."
- "It should not have the T911 registration process because all mobile devices should be automatically included with T911."

162. As shown in the graph on the next page, of these 19 surveyed Telus respondents, only 47% reported satisfaction with Text with 9-1-1 services.

Text with 9-1-1 was the service satisfactory?
(Did you use it and successful emergency services came)



163. We also wanted to know if the Text with 9-1-1 service was meeting our consumer groups' expectations and experiences, and this is what they said about the Text with 9-1-1 service coming from Telus customers:

- "Didn't use it because non-voice plan block of it."
- "It's complicated, call first then text- what if it was a life and death situation where i need immediate access it's not effective."
- "No way of knowing if it works or not. Has. To been truly tested."
- "Not applicable - have never needed to use it"

iii) **Bell Mobility and Virgin Mobile**

Only 3 respondents of 51 are Bell Mobility customers as seen in this map:

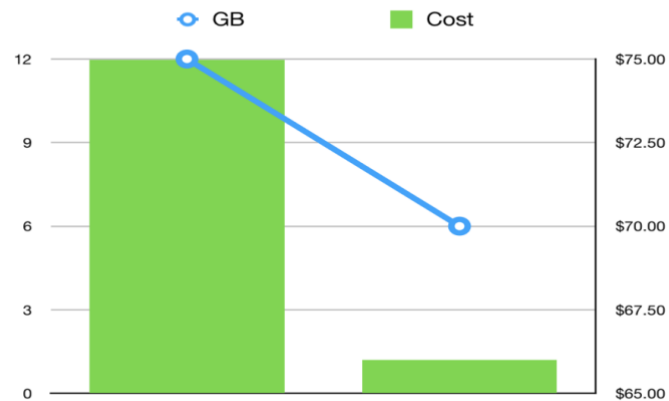


164. For the number of years a customer has been loyal to Bell, the longest customer had stayed with Bell was for 6 years, while the newest customer had been a customer for 3 years. The average number of years for the total of 3 customers was 3.7 years.

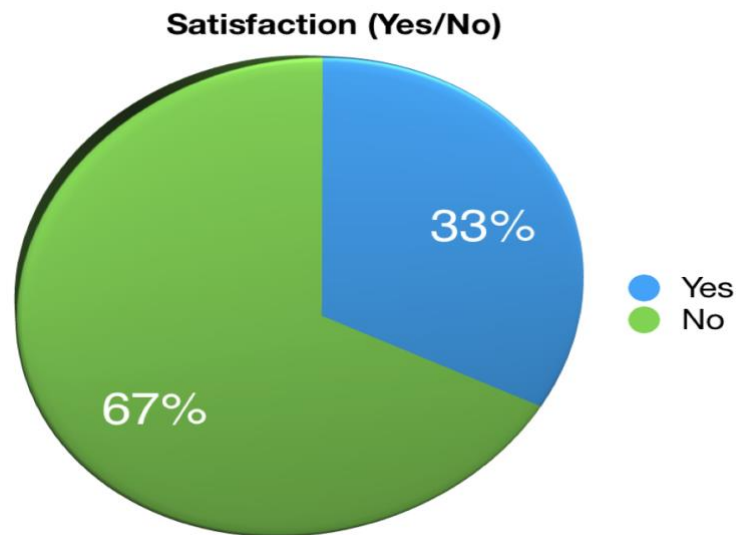
165. The average the 3 customers were paying for their wireless plan was \$70.50, and none had an accessibility plan. The most GB of data the customer was paying for in a month was 12GB, and the lowest was 6GB with the other person having a text-only plan. With only two people entering the

information the charts and statistics aren't as clear. It does seem one person has a good deal while another seems to have a deal on par with the amount of GB they are using as seen in this chart:

Do you currently have an accessibility plan with the wireless company?
Describe the plan, how many GB do you pay for, and how much monthly do you pay?



166. Are they satisfied with their wireless plan? According to the chart they are not satisfied at 67% while one person seems very happy with the plan they have, which makes up for the 33%.



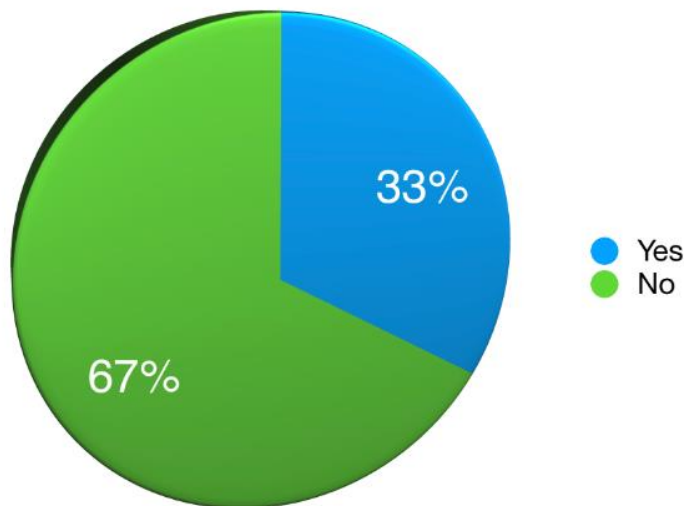
167. Sample of text narratives supplementing the response:

- “Call forwarding n’est pas gratuit” (Call forwarding is not free)

168. Are people registered for Text with 9-1-1 with Bell?

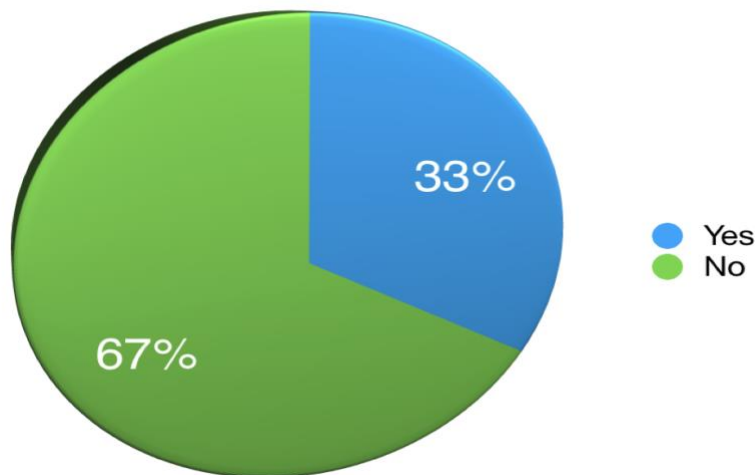
According to the graphic on the next page, 2 out of 3 are not registered, and only one is registered, and with this it means 67% are not registered with Text with 9-1-1, while only 33% are.

Are you registered with Text with 9-1-1 with your wireless company?



169. With Bell Mobility's Text with 9-1-1 registration process, 67% found it hard, with only 33%

Was Text with 9-1-1 registration satisfactory (easy or hard)?

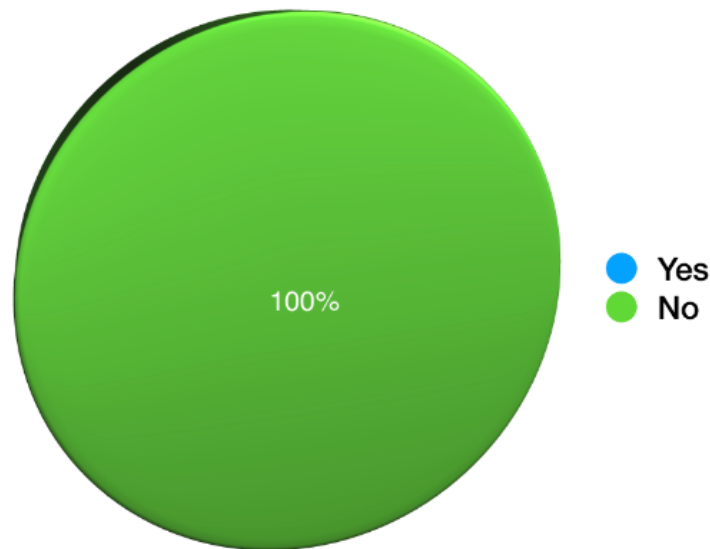


170. The Bell Text with 9-1-1 registration process is described with samples of text narratives supplementing the response:

- "I was on Bell and it's blocked to register. Not bother if transfer to new company and no point to register if it's lousy service."
- "The whole process is complicated - call first then text - what if i was in a life and death f situation I'd want a direct text or quicker access to their services."

171. Did Bell Mobility customers have successful experiences with emergency services using Text with 9-1-1? Out of 3 people, there was no successful experience with emergency services, as seen in the pie chart on the next page.

Text with 9-1-1 was the service satisfactory?
(Did you use it and successful emergency services came)



172. Many did not have emergency services come or have never had to use Text with 9-1-1.

iv) **Freedom Mobile**

Only one of the 51 respondents is a Freedom Mobile customer, and resides in British Columbia as seen in this visual graphic:

Freedom



173. Since there is only one Freedom customer as shown in the map above, we will type out the responses for each of the questions for this one person instead.

174. The only customer has been with Freedom Mobile for 7 months, so under a year. Here is the text narrative comment from this customer: "At Freedom's store, I have inquired about their Accessibility Plan (AP) but the salesperson wasn't aware of it. I have directed them to their AP page at this [link](#) and the person said to me that the AP was repurposed from an old plan for the tablet but with the text add-on. There is no voice on their AP (capped at 10GB)

with no roaming data and voice. I have went with the employee plan instead, which was capped at 8GB for home network with 1GB roaming data (outside of home network) + voice + text. Pay approx \$40 per month on employee plan. AP is I think around \$50 per month.”

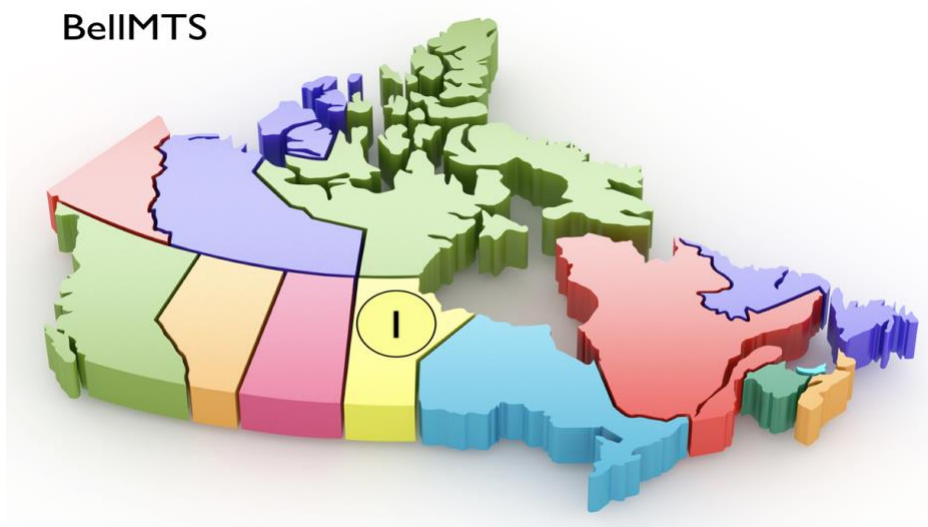
175. Furthermore the customer went on to add: “Network is spotty and not always reliable especially for texting. I get no reception in area or text will arrive late at destination. Also, when I tried texting to a “premium number”, I’d be charge per SMS regardless if I am well below the monthly SMS limit. I have reduced my dependency on texting and instead rely more on data plan which includes using WhatsApp for a more consistent experience. LTE connections are more stable now and will sometimes drop to 3G or lose signal completely. There are absolutely no signal (data and text) when travelling between Calgary and Banff. When “roaming”, I thought that I’d be on a partner network for data but it doesn’t always seem to be the case.”

176. This customer is not registered with Text with 9-1-1 with Freedom but further explains: “Yes I have registered for T911 in the past for my phone number however I have found out that changing WSP will require me to re-register. See <http://textwith911.ca/en/faqs/> FAQ: If I get a new cell phone or change my SIM card, do I need to re-register for the T9-1-1 service?

177. No, if you do not change your telephone number. However, please note that you do need to validate with your wireless service provider’s website that the new device is compatible with the T9-1-1 service. If I change my telephone number do I need to re-register for the T9-1-1 service? Yes. You will need to deregister the old number and register the new one. If I change my wireless service provider do I need to re-register for the T9-1-1 service? Yes. You will need to deregister with your old provider and register with the new one.” Finally, this customer also comments: “There’s no option available to send a test text to T911.”

v) **BelIMTS**

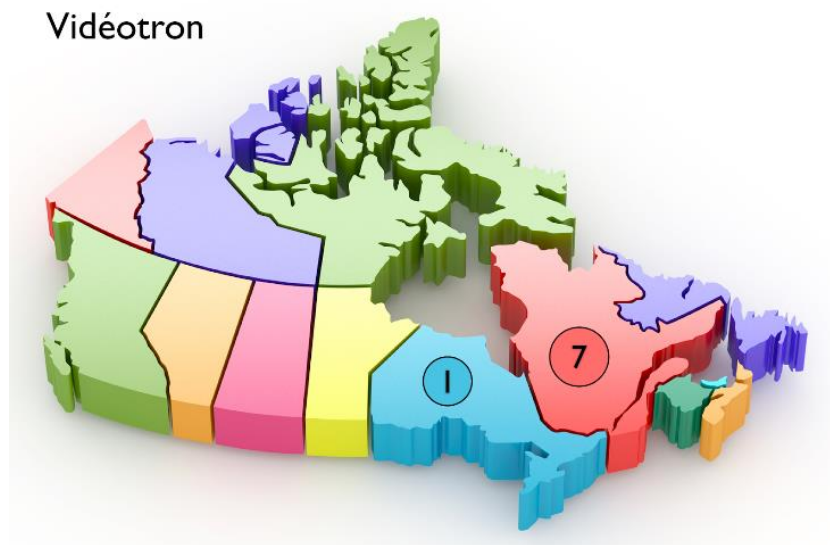
178. With only one person being a BelIMTS customer, it is no question that person comes from the province where the provider operates out of - Manitoba, as seen in this visual graph below.



179. Due to it only being one customer for Freedom, as the graph is 100% for that one person. we will type out the responses for each of the questions for this one person instead.

180. That one customer has been a customer of BellMTS for 20 years and is paying \$70.00 for unlimited data and they seem very satisfied with this package. Was not registered for Text with 9-1-1 and had never used it.

- vi) **Vidéotron (Quebecor)** - Many francophone survey respondents were Videotron customers with seven in Quebec and one in Ontario, as seen in the map below:



181. The number of years the 8 surveyed Videotron respondents had been with Videotron ranged from one year to 4 years with an average of 2.5 years.

182. Of the 8 Videotron survey respondents, 1 did not have any data plans and 7 respondents reported having a range of 2 GB per month to 9 GB per month with an average of 6 GB per month. As an aside, the remaining one surveyed Videotron respondents did not describe his / her data plan is therefore excluded from this data plan discussion.

183. Five Videotron survey respondents who divulged how much they paid for their data plans paid anywhere from \$65 for 3 GB / month to \$80 for 8 GB with an average of \$81.20 for 6.2 GB.

184. Only one surveyed Videotron respondent reported s/he had an accessibility plan - that being an extra 2GB of data.

185. These numbers show Videotron as a company with very low uptake on its accessibility plan.

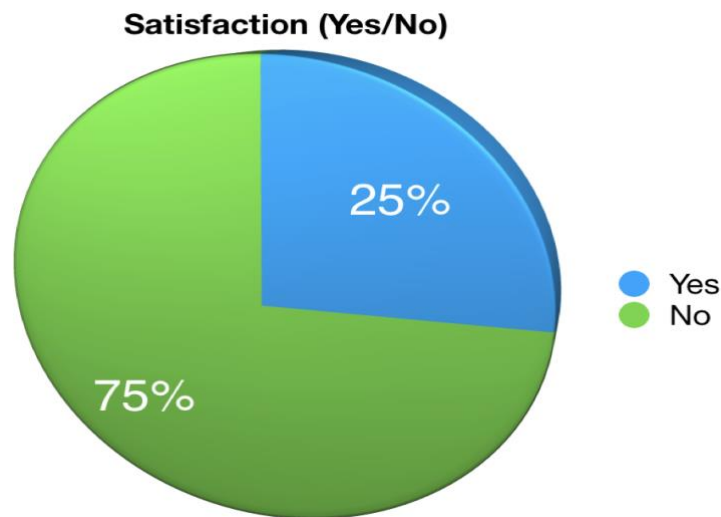
Do you currently have an accessibility plan with the wireless company?
Describe the plan, how many GB do you pay for, and how much monthly do you pay?



186. Only one text narrative was offered regarding Videotron's data plan accessibility plan as follows:

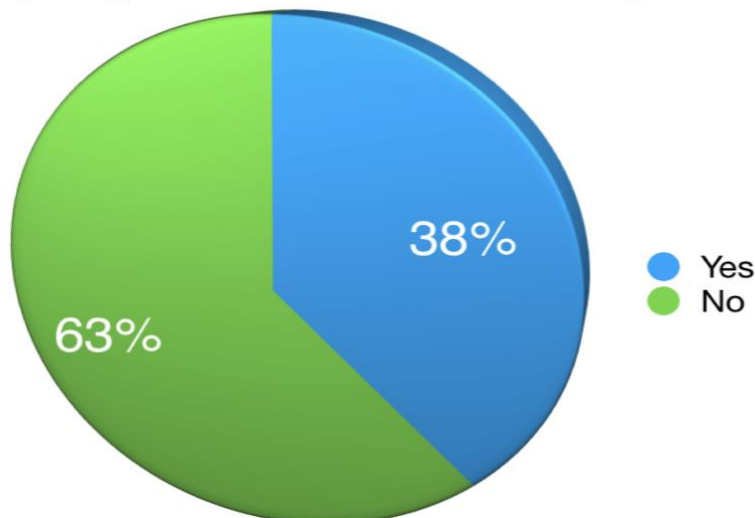
- “Normalement, le plan maximum est 6go pour 96\$. J'ai le surplus de 2go vu que je suis handicapé et Vidéotron offre ça pour les gens handicapés. Mais parcontre, je paye seulement la moitié du prix mensuellement vu que mon copain travaille chez Vidéotron. Presque toute sa famille a cette chance d'avoir un bon prix.”

187. When asked about wireless plans and accessibility plans, 75% of our surveyed Videotron subscribers were not satisfied with their packages and their pricing, as seen in the graph below:



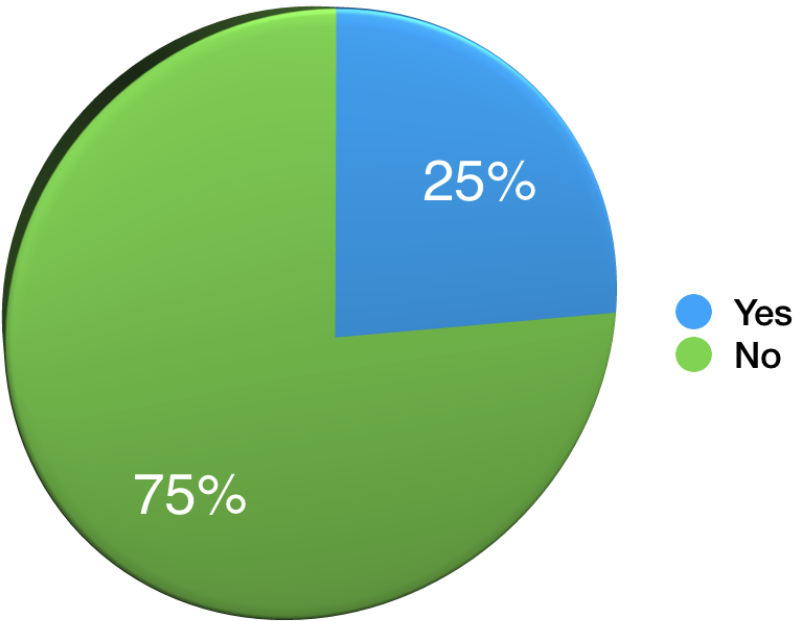
188. As shown in the graph below, 63% of the surveyed Videotron subscribers registered for Text with 9-1-1 through their wireless subscription.

Are you registered with Text with 9-1-1 with your wireless company?



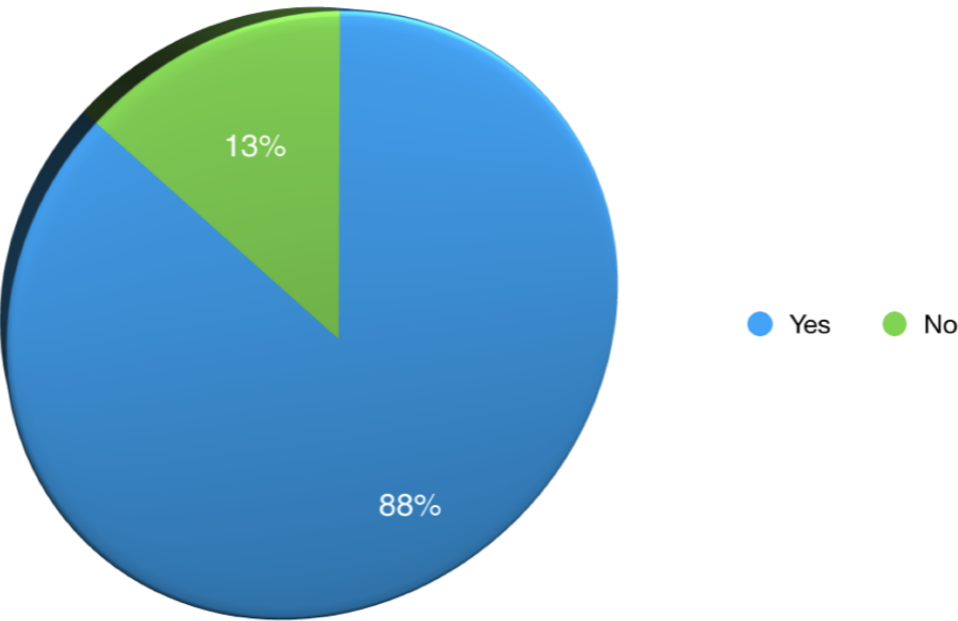
189. As shown in the graph below, 75% of the 8 surveyed Videotron wireless subscribers were not satisfied with the Text with 9-1-1 registration process.

Was Text with 9-1-1 registration satisfactory (easy or hard)?



190. As shown in the graph below, of these 8 surveyed Videotron respondents, 88% reported satisfaction with Text with 9-1-1 services.

**Text with 9-1-1 was the service satisfactory?
(Did you use it and successful emergency services came)**

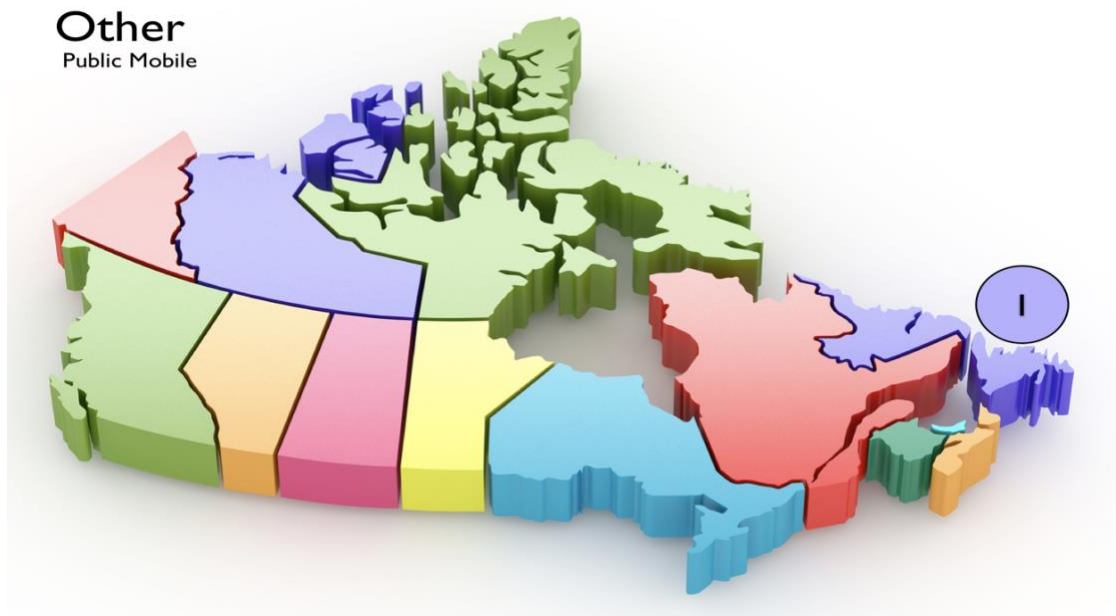


191. The surveyed Videotron respondents offered the following comments when asked about their Text with 911 experiences:

- j ai jamais utilisée ce service.
- Non pas encore
- je répète que je n'ai jamais essayer
- Jamais eu la chance d'utiliser... j'aime mieux rien voir ce qui arrive à quelqu'un!
- Pas assez de mémoire.
- Je n'ai pas pu, puisque mon inscription n'est jamais passé!
- Jamais utilise

vii) **Other (Public Mobile)**

192. With only one person putting down Other and specifying Public Mobile, have a look which province that person originates by seeing the visual map laid out below:



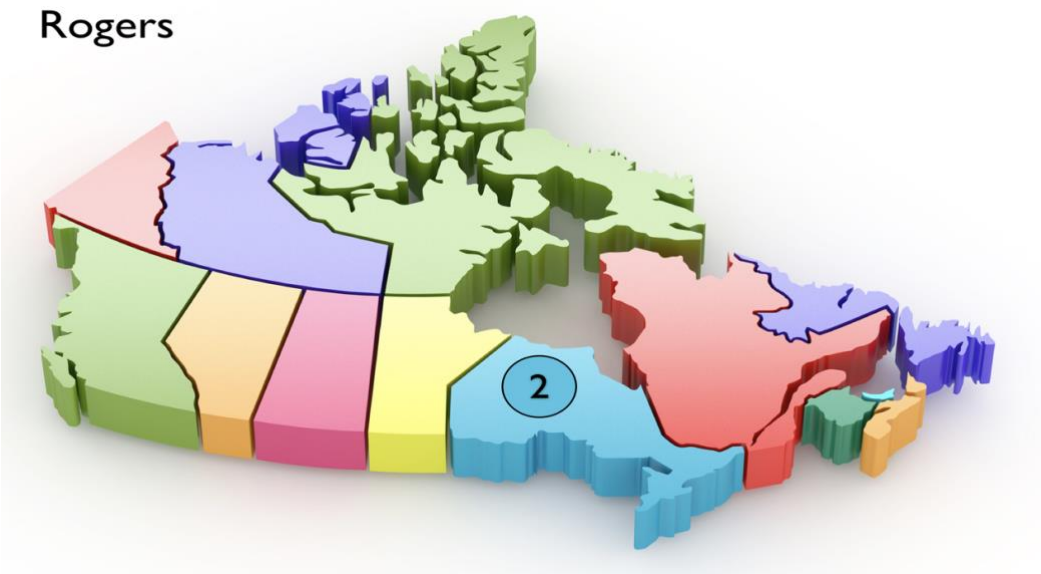
193. Due to it only being one customer for Public Mobile as the graph is 100% for that one person. we will type out the responses for each of the questions for this one person instead. The one customer from Public Mobile had been a customer only for a year so far and did not have an accessibility plan and did not explain their wireless package. They are registered for Text with 9-1-1 and made this comment: "Required me to send an email to the company (and did not provide a link, I had to copy and paste the email address). Didn't know what to say in the email, wasn't sure if it went through, they never emailed me back to confirm. When checking my account later, I saw that it was added, so I felt better."

194. The fact that this customer wasn't sure about them being registered is a common denominator in many of these responses that most Deaf people aren't sure if the Text with 9-1-1 registration worked.

b) Internet

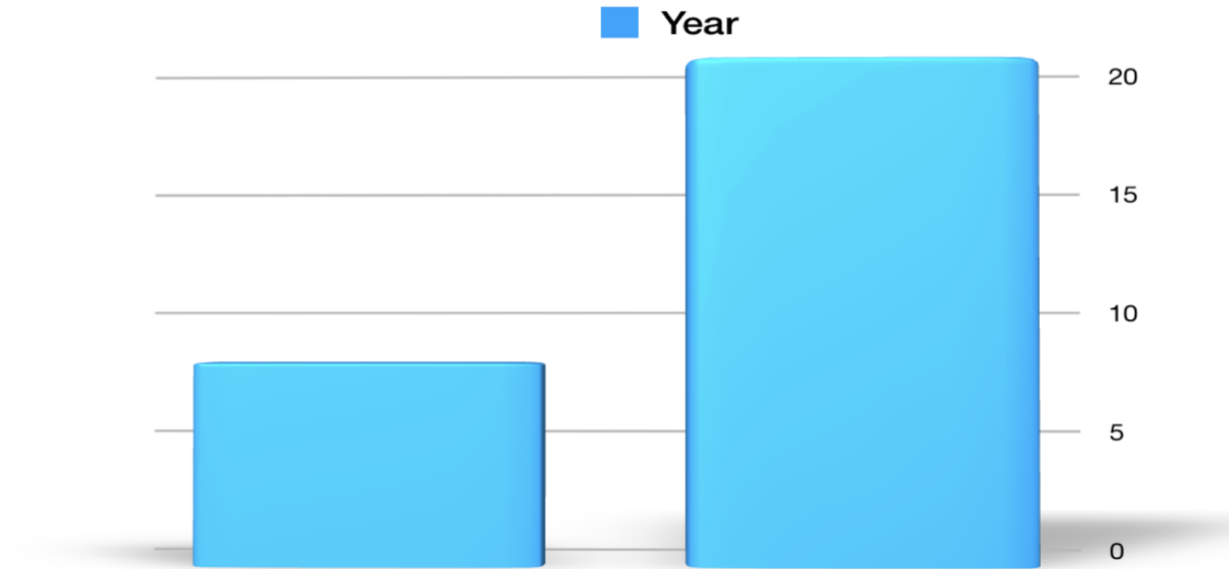
i) Rogers

195. In this survey we asked not only about wireless companies but also internet companies regarding their accessibility services. Here is a map of Rogers home internet user numbers - there were only 2 out of 51 Rogers at home internet customers that are DDBHH.



How long have you been a customer of Rogers for home internet?

How long have you been customer of company?



ii) **Bell**

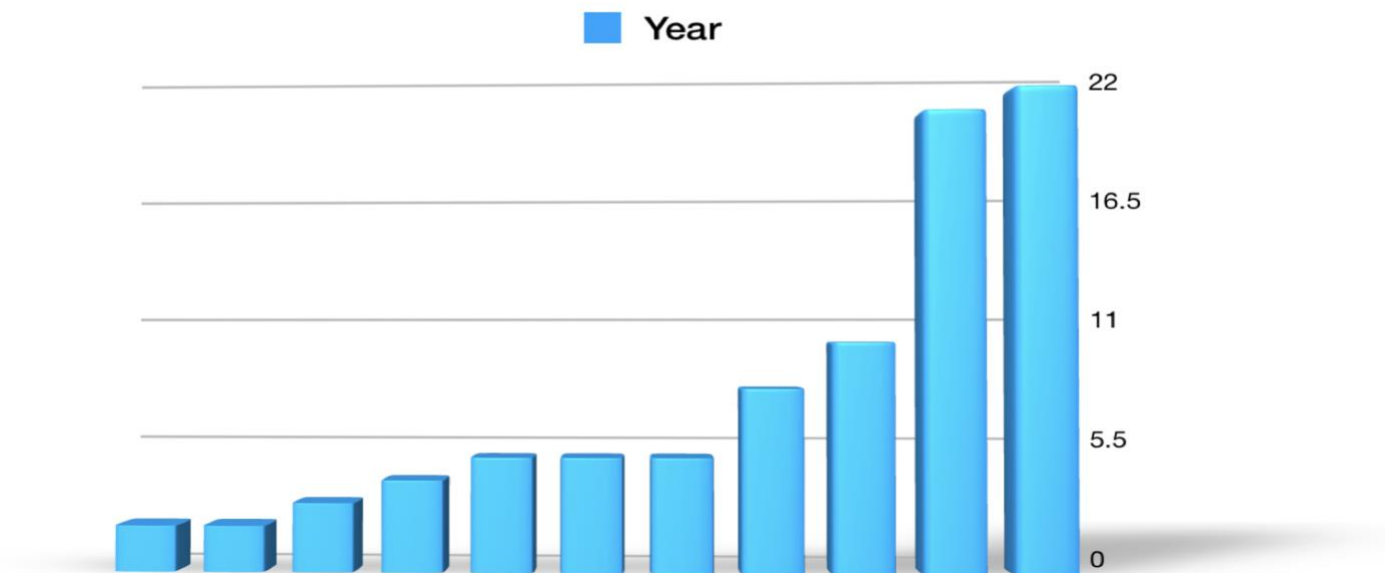
196. There was a total of 11 Bell at home internet customers, and here is their geographic origins with a strong Eastern Canada presence:

Bell



How many years have you been a Bell internet at home customer: The longest customer of Bell was 20 years, with the more recent customer joining 2 years ago as seen in the below graphic.

How long have you been customer of company?



iii) **Shaw**

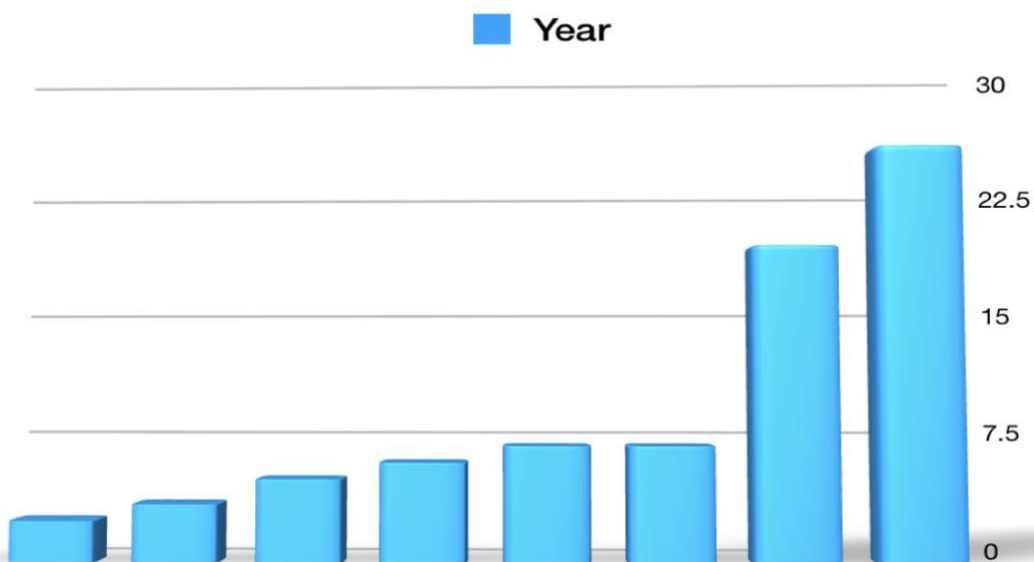
197. There were 8 respondents who were Shaw at home internet customers and the map shows a strong Western customer base:

Shaw



Shaw customers have a very strong loyalty with the longest customer being with Shaw for over 25 years, and the newest customer at 2.5 years.

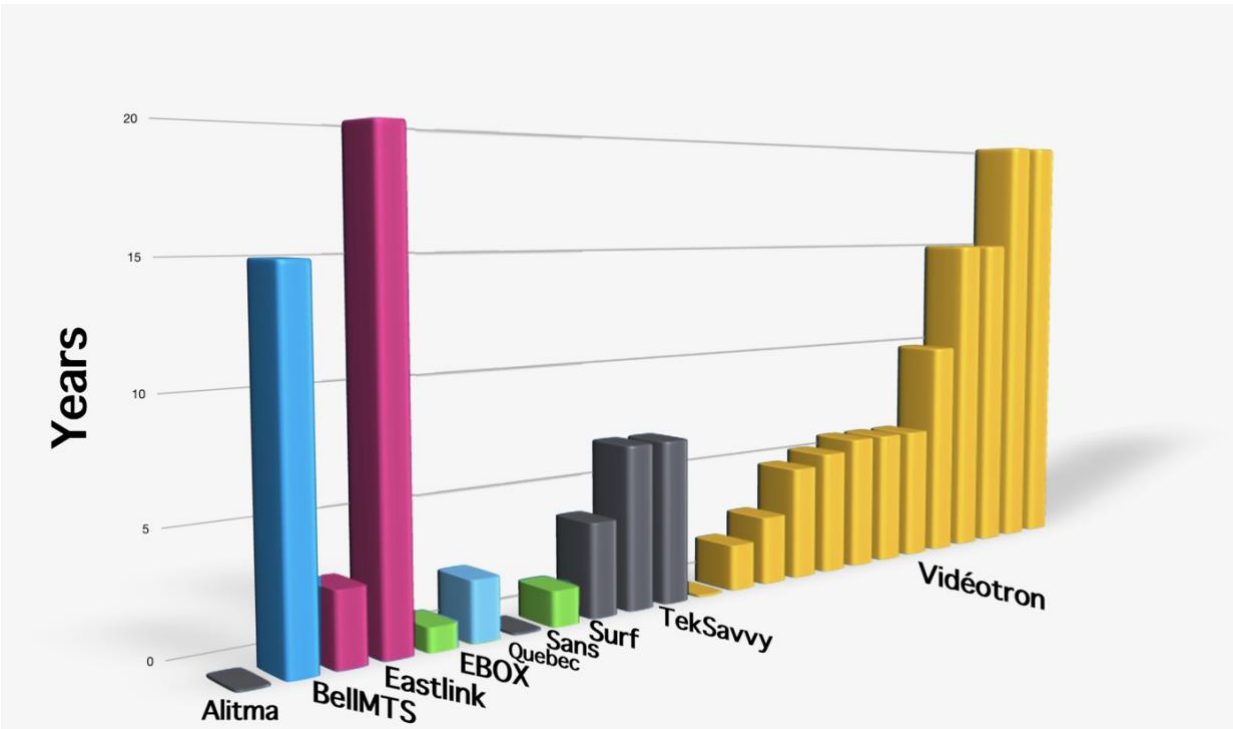
How long have you been customer of company?



iv) **Other**

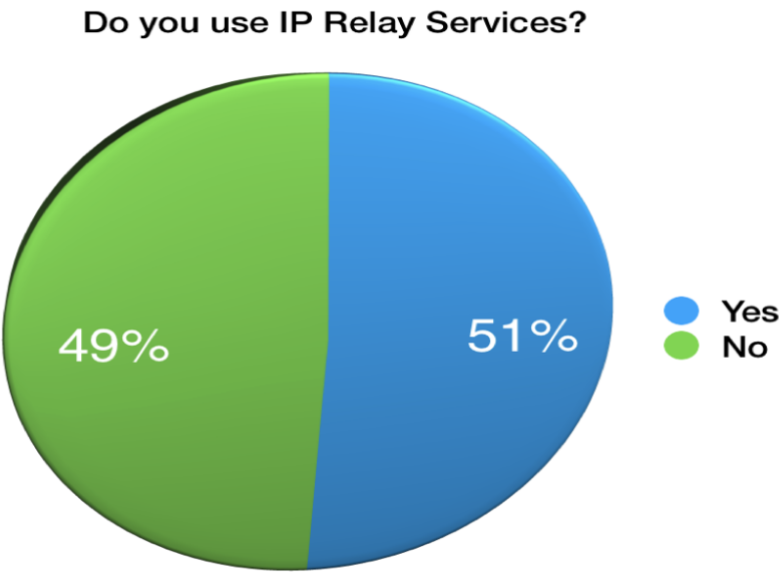
198. The following companies were not on our multiple choice list but out of 51, 25 respondents checked "Other" and in the text boxes listed other companies, and the results were 13 Videotron customers, 3 were Teksavvy customers, 2 were Eastlink, 1 was a BellMTS

customer but thereafter there were various individuals subscribing to very small lesser known internet service providers.



c) IP Relay and Customer Service - Overall

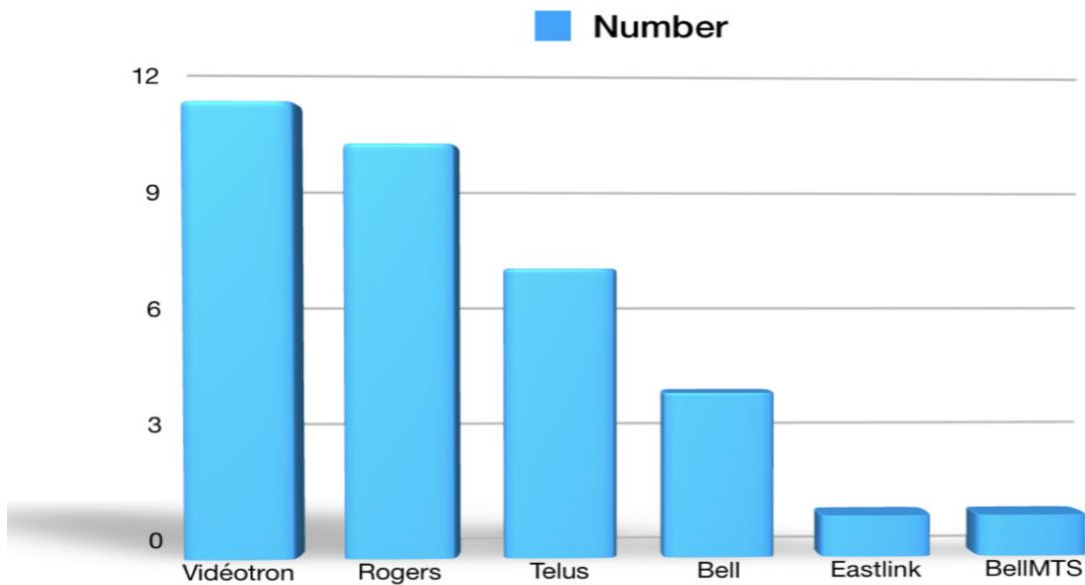
199. Of 51 respondents, only 34, at 51% are IP-Relay users, with 49% not IP Relay users, and here are the statistics in graphic form:



200. A company by company breakdown of the 34 IP Relay customers and the number of years they have been IP Relay customers of that company with, the longest customer being

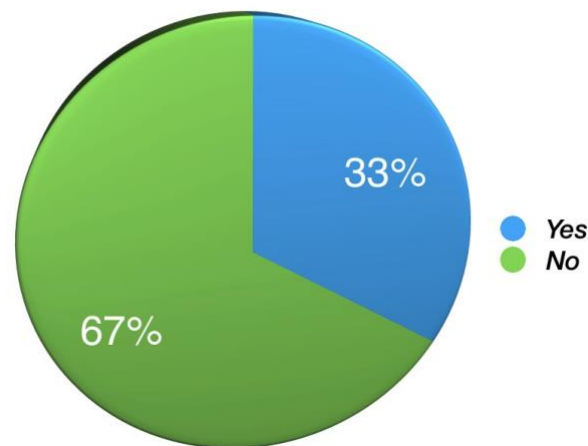
an IP Relay customer of Rogers for 10 years, and the shortest time as an IP Relay customer was tied between Eastlink and BellMTS with only one year of being an IP Relay customer.

Which company do you use IP Relay Services with and how long?



201. Of the 34 IP Relay Service users, are any of these customers satisfied with their IP Relay Service? Here is a breakdown of who is and who isn't. 67% are satisfied while the other 33% aren't.

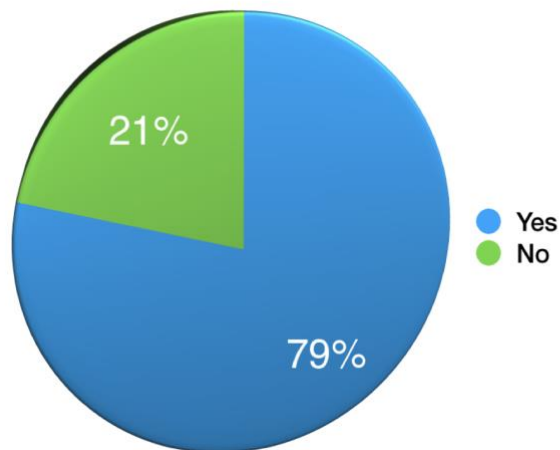
Was IP Relay Services satisfactory?



d) Customer Service

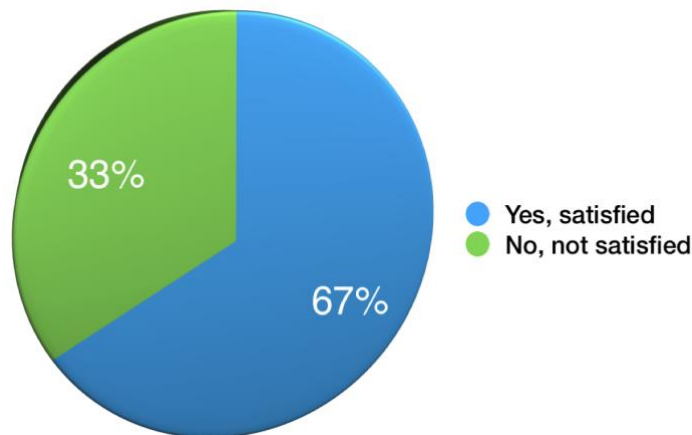
202. **Have you used Customer Service?** We described this as either online customer help service or over the phone. 79% had experienced and used customer service in either form. See chart on next page:

Have you used customer service? Either online help or on phone.



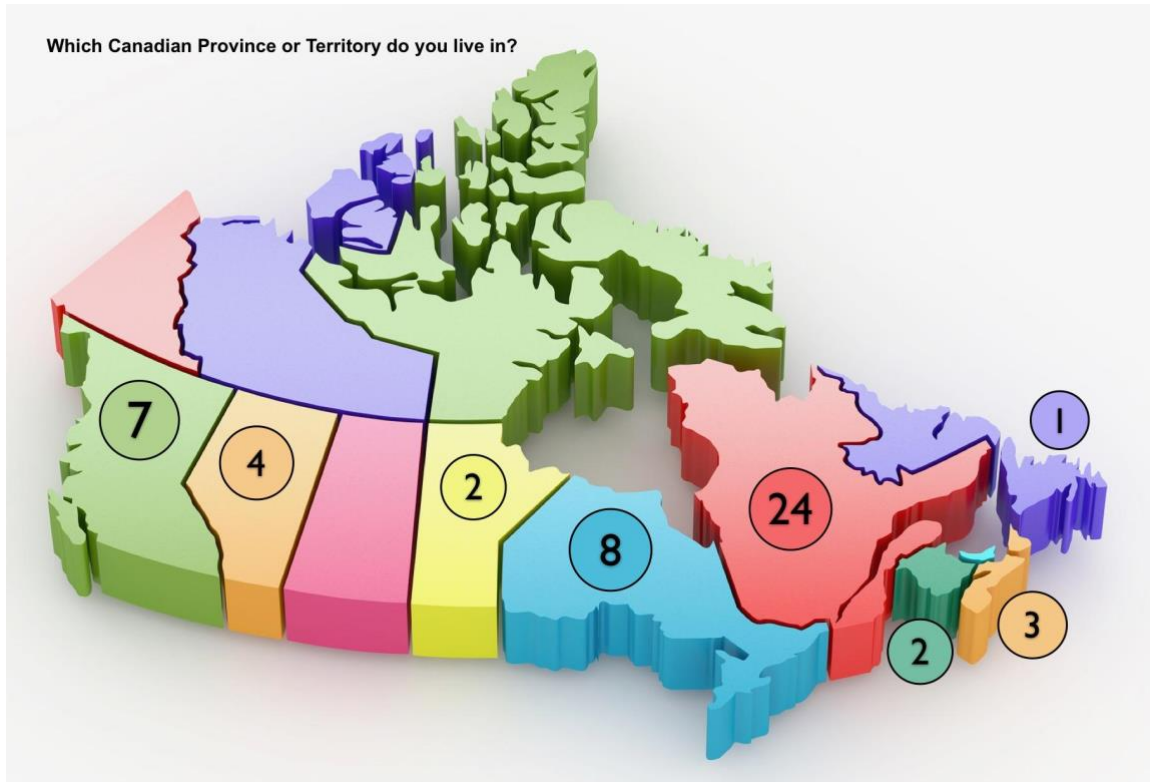
203. Customers found either phone or online help services satisfactory at 67% with lower percentage not satisfied.

Customer service - was it satisfactory?



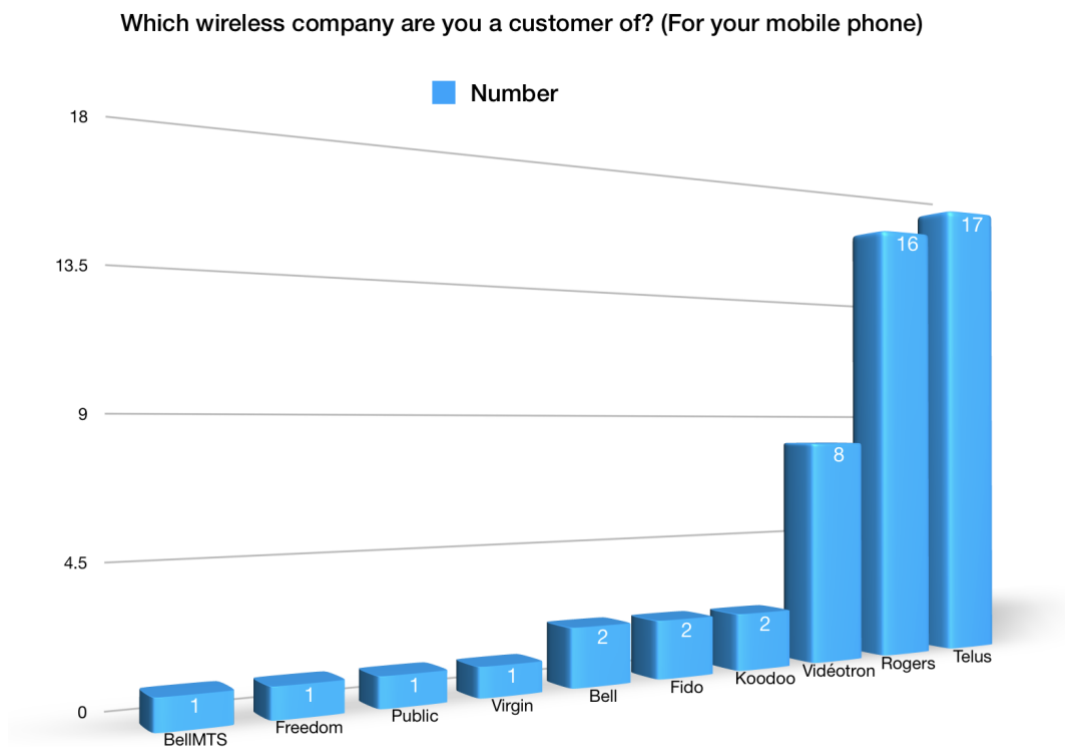
e) Full Complete Analysis of overall survey

204. The geographic locations of the full total **51 respondents** is visually captured here with the highest originating from the province of Quebec, following with Ontario, BC, Alberta and then to the Atlantic and Eastern provinces, with no participation by those who reside in the Territories. The map summarizing this can be seen on the next page.



Which Wireless company are you a customer of?

205. At this time, Telus has the largest number of customers from our pool of 51 respondents, at a total of 17 customers, following with Rogers at 16 and Videotron at 8. The rest only had one or two customers each of Bell Mobility, and the smaller companies.

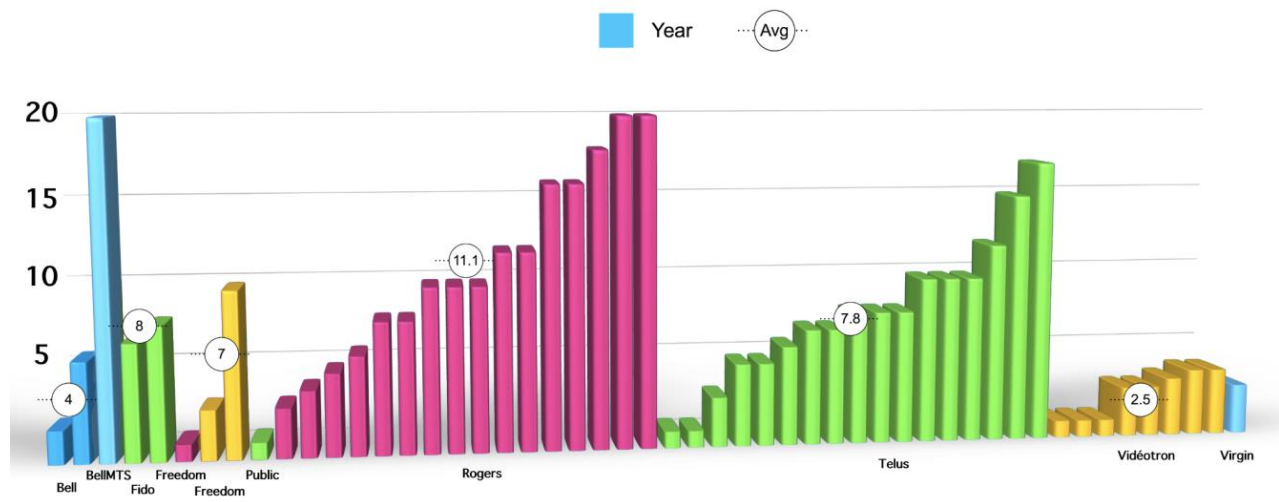


Total 51 survey respondents from 8 provinces

How long has the Deaf or hard of hearing customer been with a wireless company?

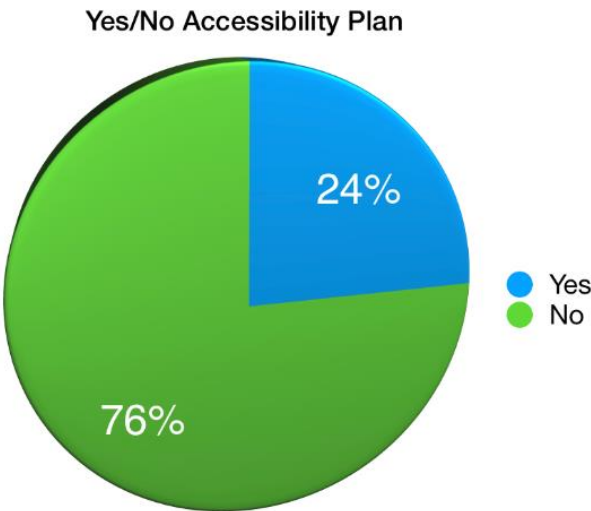
206. The highest number of years the customers had been with their wireless company was 20 plus years, while the newest customer had only been with the company for only 7 months. The highest average number of years of loyalty to the company was Rogers Wireless, with Telus Mobility following, and BellMTS does have its sole customer who participated in our survey as a loyal customer with 20 years of being its customer.

How long have you been with the wireless company? (# of years)



Do you have an accessibility plan?

207. Out of the 51 respondents, 76% do **not** have an accessibility plan, while 24% do. DWCC et al hoped it would be the other way around, consequently, the goal is for DWCC et al to discover why this is the case in an upcoming survey, if allowed by the CRTC.

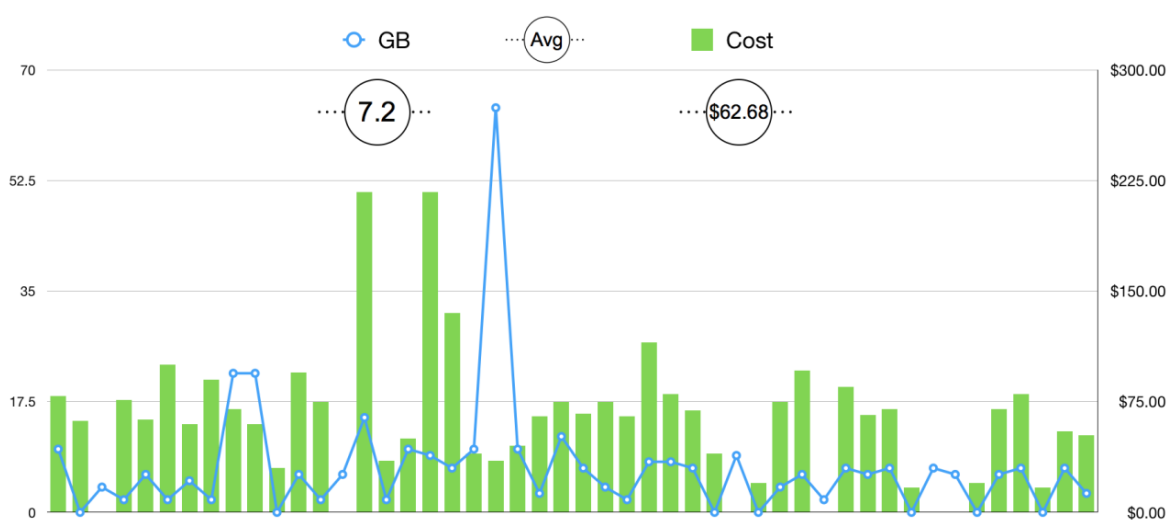


Accessibility Plan graph

208. Respondents were asked if they had a data plan yes or no and to describe what amount of data they had and how much they were paying. The range of gigabytes a Deaf, Deaf-Blind or Hard of hearing person has a data allowance for is from low at 2GB to 15GB. The highest a customer is paying \$217.00/month for their data usages on their wireless plans. The average customer was paying \$62.68 for 7.2GB of data.

209. However, on the chart there was an unusual response of 64GB, although we feel it might actually be the data storage on the smartphone rather than the monthly plan, which is why digital literacy is essential for this accessibility group, with English and French as their second languages. DWCC et al looks forward to the wireless terminology videos to be released as a part of CRTC TRP 2017-200.

Do you currently have an accessibility plan with the wireless company?
Describe the plan, how many GB do you pay for, and how much monthly do you pay?



210. Here is a sample of text narratives supplementing the response:

211. Samples of the narratives of all of the customers are inserted here rather than with the individual companies, separated by language:

English comments:

- “Do not have accessibility plan. Not on Telus accessibility plan (10 GB for \$60) but get D/HOH discount x 2 (\$30 off), I get 300 minutes for \$50 (WHY?) and 6 GB for \$40. I pay \$79 a month.”
- “Just an ordinary plan, about \$62/m including taxes. At home my family have a Telus plan at about \$40/m per person but it has restrictions, e.g. no access to websites.”
- “No. It is a standard plan with 4GB monthly data, and voice cannot be removed or minimized with a proportionate reduction in price. I cannot add more data to support VRS and other visual communication services without paying the standard premium price.”
- “Sort of. The plan was customized back in 2006 and has been the same for a long time. My mom is a part of the plan. 6 GB each, \$63 each/month. Mine w/o voice and mom’s has voice. \$126 per month for us.”
- “I do not have an accessibility plan as I am waiting for a better offering on the accessibility plan. Currently, I pay at around \$100 for 2GB with added-data charges, totalling up to 8GB for \$220 monthly.”

- “I don’t think I have an Accessibility plan and I only have 2 GB for the monthly of \$90.00 plus taxes”
- “Yes. 6 GB and \$95/month”
- “No, i was denied accessibility plan because apparently my plan is under “business” so i don’t qualify even if I didn’t want my plan to be under business. I only have 2GB and pay 75 dollars for it.”
- “No accessibility plan. We pay 15GB for shared plan \$217.00 month approx. First person pays 125.00/month, second person pays 75.00/month. Rogers just created accessibility plan so will request for each of us to get \$40.00 off but it is still ridiculous.”
- “The Rogers Plan that was arranged by GVAD, which we signed up for in 2014: unlimited texts within Canada and the US, 2 GB data = \$35.00 each device (before taxes). It’s the same to this day.. with taxes, it comes to about \$81.00 for both our devices (separate numbers).”
- “9gb share plan, \$217.00 per mth”
- “7 gb per month at \$135 per month”
- “Yes \$60/10GB promo and got discounted to \$40 via accessibility.”
- “Yes. \$60 for 10 gb then I have a discount of \$20 as Deaf accessibility. I pay \$45.20 including taxes”

French comments - samples of narratives:

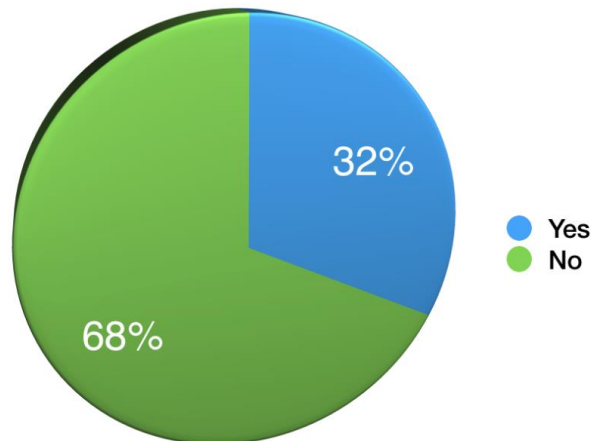
- “Normalement, le plan maximum est 6go pour 96\$. J’ai le surplus de 2go vu que je suis handicapé et Vidéotron offre ça pour les gens handicapés. Mais parcontre, je paye seulement la moitié du prix mensuellement vu que mon copain travaille chez Vidéotron. Presque toute sa famille a cette chance d’avoir un bon prix.”
- “8go et 115\$ par mois mais Telus m offre rabais 20\$ donc total 95\$ par mois avec contract de iPhone 2 ans.”
- “Oui avec le rabais de 20\$ pour personnes sourdes Le prix est 67\$+tx avec 7 GB”
- “Oui, j’avais une réduction de 15\$ et maintenant il a remplacé par une nouvelle réduction de 20\$. 7GB à 15\$ avec forfait de 45\$... Je paye 55\$ par mois avec taxes incluses.”
- “52,25 (tx inclus) pour 3 GB.”
- “J’ai texto seulement, 50 minutes d’appel. Mais non, c’est pas un forfait “adapté”! Je paye 20.00 par mois. Sans Internet.”
- “150 \$ 17 GO pour deux personnes”
- “Oui. 70 par mois. 6 go”
- “66\$/mois pour 6Go”
- “Non. 4 Go. 75\$”
- “Appel illimité au canada, texto illimité, afficheur boîte vocale, 7 Go pour 85\$”
- “La province du Québec n’a pas pu bénéficier la promotion 10GB pour 60\$ récemment. J’étais extrêmement déçu.”

212. This is what DWCC et al is trying to show all involved in these issues, there is no consistency within the companies, and we predict is because of a lack of understanding or awareness of these accessibility plans the fact that the \$20.00 discount does not benefit the largest data package of GB per month and most expensive paying customer. Our goal is that with the sample of the comments and narration from these random comments above demonstrates that we still have work to do ahead to create fairness with these accessibility groups utilizing heavy data usage for accessibility purposes.

Satisfaction with accessibility plan graph

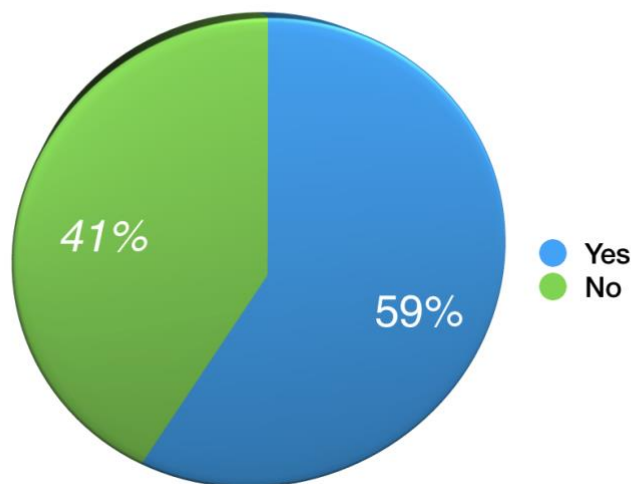
213. If they are customers with an accessibility plan, are they satisfied, 68% said no, which is not surprising consider some of the discounts would not benefit or apply especially to the heaviest data package customer currently with their monthly costs over \$150.00. See graph on next page.

Are you satisfied with the accessibility plan, if not, if anything, please explain what would make your wireless plan up to your satisfaction?



Are you registered with Text 9-1-1 with your wireless company?

Are you registered with Text with 9-1-1 with your wireless company?



UNLIMITED DATA

214. In the Wireless Code hearing (TNC 2016-293), after a massive public relations blitz in the States, the DWCC panelists/consultants suggested that for our accessibility group for the companies to consider “unlimited data” accessibility packages which means 20-22GB of data which would solve the overage and high expensive cost issues by DDBHH Canadian wireless customers. The exact words were:

“4706 MS. ANDERSON-KELLETT(by interpretation): If I could just add, one big concern with the deaf community is video communication, and it uses a lot of data. We are trying to come to an agreement on that. The deaf community would like unlimited with no cap. They don’t want to worry. They want the freedom to be able to communicate and use their phone anywhere anytime we need. But it seems that a cap is wanted by the WSPs....

4707 *We don't want to be penalized for data overages because that's our only mode of communication. So that is one thing that we really want to emphasize, unlimited data is our preference.*

“4739 MS. MARSH (by interpretation): For some other hearing people who may use voice minutes, they have options to pay \$100 or \$150 for voice plan and they get -- so if they have a data plan, they get unlimited minutes. But if we're deaf we can't take advantage of that plan. We need more data in order to communicate and that's why we need unlimited signing minutes. Our phone bill would cost thousands of dollars, you know, in comparison to that \$100.

4740 MS. ANDERSON-KELLETT (by interpretation): We don't want to pay for overages. We should not be penalized to communicate in our own language and have accessibility.

4741 MR. BEATTY (by interpretation): We depend fully on video communication. I have four hearing members of my family and they all call me and want to talk to me and I need to be able to sign and chat with them, and that depletes my data. I often face that experience, but I want to be able to communicate with them. It's a huge issue. I'm a teacher and parents often will call in and want to chat with me, and that depletes my data. But they're fine. They have unlimited voice minutes and they can call and chat with me as long as they like but I'm limited in communicating with them.”

Source: [transcript](#)

DECEMBER 2017 10GB/\$60.00 PROMOTIONS IMPACTS

215. DWCC and CAD-ASC would like to present the challenges and experiences DDBHH Canadians had in December 2017.

216. During the weekend of December 14 to 18th, some with one day extensions to 19th, in some provinces, BC, Alberta, and Ontario, there was a promotion blitz by a majority of the wireless companies. There was a viral information video (vlog) in ASL by one member of our Deaf community promoting the deal and the video (vlog) is inaccessible in LSQ. After this happened, there were quite a few impacts.

217. The first perspective as a result to these promotions was “if the companies are willing to go that low for the general population for data packaging, then the accessibility packages need to be lower for accessibility reasons.” To be frank, not only did our Committee members, but hundreds of DDBHH Canadians went through a wide range of emotions through this promotion, with a perspective that there data price packaging “unfairness.” There was no functional equivalency.

218. The perspective our accessibility group was coming from is why do “audio-speaking” people get data package benefits while the people who NEED the video communications data usage don't get benefits. It is puzzling.

219. As a result of this promotion, there was a massive tagging of the DWCC Chair on Facebook, and e-mails flooded in DWCC's e-mail box, essentially there were a number of issues. First, people didn't understand why they couldn't get the plan, it was not clear. There were no accompanying ASL and LSQ promotional videos to come with the promotion to provide clarity. Secondly, many of these DDBHH customers were being denied accessibility discounts.

220. The Chair had to convene with DWCC executive team to problem-solve and we reached a consensus that the agreement was *DWCC are not customer service* and to state so, but as a priority for human rights, and accessibility issues, to go ahead and filter the responses that were directly related to accessibility plan denials or misunderstandings.

221. Through these communications it became clear that the line queues on the phone and in the stores were just way too long and with waits that took “forever,” that customers service and sales agents just did not have time to deal with the “additional step” of the accessibility discount. So, the Chair posted on Facebook to encourage people to go ahead and grab the deal and just wait be patient and call in 3 days later after the “dust had settled,” and more cases were resolved also through referrals for further assistance.

RESULT

222. Many customers of other companies switched to Telus because they had the ‘best accessibility deal’ with \$20.00 off and it meant for many Deaf people it would actually be \$40 for 10GB which was one of the best deals. There was an exodus movement of customers leaving Rogers and Bell for Telus at this time as they were the only company providing the attractive accessibility plan. Bell was the biggest loser in this data competition, with only offering 2GB free data and no monetary benefit to accessibility groups. Rogers did not have a very well laid out accessibility plan at the time so many Rogers accessibility group customers got no benefit. In the end, many were able to get \$40.00 for 10GB with Telus.

223. Fact is, there were about 30 messages that came through email. There were an additional 20 inbox messages on Facebook Messenger. The Chair reached out to each of the accessibility departments of the big 3 companies to get assistance and expressed the frustrations and challenges. The Chair spent her vacation days voluntarily filtering messages and referring all these 30 customers connecting and referring to primarily Telus, and Bell and responding and clarifying to those emails that Rogers (at the time) doesn’t have the same offering as Telus. It was frustrating and heart-breaking to hear stories of rude customer service people outright refusing to give discounts and denying even if the information was on the websites. At last count, three people still don’t have accessibility plan discounts, one just because they have a business account and for some reason therefore does not qualify for an accessibility discount, and which is not justifiable, and needs to change. Accessibility discounting should apply also to even business or corporate packages.

224. RECOMMENDATIONS

1. Accessibility Plan information should be available on a one-page web page easy to print off and bring to store for these customers.
2. Mandatory dedicated company accessibility e-mail addresses. Only one company of the three had a dedicated accessibility e-mail address, Bell. We commend them on this.
3. Dedicated accessibility phone numbers would also be recommended so that the questions are filtered to a specific topic as a whole, as there were too many frustrated DDBHH Canadian customers on the busy general phone number lines.

225. Truthfully, the heads of each accessibility department cannot be expected to do front line customer resolutions. DWCC et al felt for them and these above suggestions should resolve any future accessibility debacles.

226. Based on our perspective and experiences from the promotional deals experiences versus the accessibility plan offerings, we need to renew and update our recommendations with the pricing proposals as follows:

- \$40 for 10GB
- \$55 for 15GB
- \$70 for unlimited data (20GB soft cap) available only for individuals with accessibility needs

227. There should not be geographic variations, it should be established pricing across the board, same for all provinces and territories. This would streamline the management and oversight of the accessibility packages.

RECOMMENDATIONS FOR SOLUTIONS

228. Overall, CAD-ASC, DWCC and CNSDB would like to state that there are still outstanding accessibility issues that needs to be addressed in order to ensure the quality of life of Canadians who are Deaf, Deaf-Blind and of Hearing:

- **Accessibility Departments** should streamline and create, if not already done so, create dedicated phone numbers and e-mail addresses to reach these departments with a focus only on accessibility issues.
- **Accessibility Stores** need to make available: Sign language interpretation and VRI interpretation services on-site at the company stores, with signage that includes access to information on the accessibility package promotions in ASL and LSQ videos inside the stores.
- **Accessibility Centres** are stores where Deaf, Deaf-Blind and Hard of Hearing Canadians staff work who offer their own lived experiences, thus a built-in empathy for customers who are DDBHH.
- **Accessibility Plans** still present ongoing issues that must be addressed and to review for a improved reasonable pricing as a true accessibility plan which presents true functional equivalency for DDBHH customers that primarily use our two national Sign languages for video communications. These packages must be created keeping in mind they must be on equal basis with hearing people as audio-speaking customers. The prices are to be reflected with respect to functional equivalency in telecommunications. It is recommended that accessibility groups meet with the companies once a year to review the prices following current trends.
- **Forethought regarding ASL and LSQ Recognition** tied with upcoming federal accessibility legislation should be applied to telecommunications accessibility service provisions. All promotions should be required to be provided in our two national sign languages with consideration to mandate the line of thinking whereas English is used, then ASL equal content is also inserted, whereas French is used then LSQ equal content is added. Accessibility needs to be taken into consideration including the two national sign languages in the areas of broadcasting and telecommunications and this includes the company websites and in-store accessibility plan promotions.
- **ASL & LSQ video** promotion of the Accessible plans, DWCC et al are a neutral entity that do not promote one company over another, and do not have the kind of budget to provide in both languages, hence the onus is on the companies themselves to produce the videos. DWCC et al are happy to provide their consultative services, as they have provided for two companies and CWTA to-date. There are recommended standards that we can advise on.
- **Accessibility Website** - the usage of two hands as a universal design such as sign language symbol should be added to each of the companies' websites to show the additional accessibility group of "sign language users" as their needs are distinct from other accessibility groups in that their data package use is heavily on video communications. To see an example of the sign, see this image:



CONCLUSION

229. This document details DWCC et al's perspectives on and made key recommendations therein:

- March 2017 and May 2017 meetings with five companies - Rogers, Telus, Freedom Mobile, Bell and Shaw
- Two meetings with CWTA - one in English / ASL and one in French / LSQ
- Accessibility reports filed in accordance to TRP 2016-496 by seven companies - Rogers, Telus, Bell, Shaw, Eastlink, Cogeco and Videotron.
- Results of an internal survey on 51 DDBHH Canadians - 25 ASL and 26 LSQ who answered questions on their wireless experiences

230. The main takeaway from this document is that DDBHH Canadians expect nothing less than full functional access at par with their hearing peers to wireless devices, programs and services. DWCC et al is looking forward to working with companies, CWTA, CRTC, and all of their accessibility teams and department team members to see that come to reality. Our work is not over, it is just beginning and we look forward to these future collaborations.

As always, please feel free to contact us should you have any questions.

Best regards,

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

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

APPENDIX A

Wireless Accessibility Report Internal Survey Questions

English & French

Survey Monkey

ENGLISH

Wireless Accessibility Report Survey (Internal only)

English survey link: <https://www.surveymonkey.com/r/internalaccessibility> (now closed)

1. Which province are you from?

- A. British Columbia
- B. Yukon
- C. Alberta
- D. NorthWest Territories (NWT)
- E. Saskatchewan
- F. Nunavut
- G. Manitoba
- H. Ontario
- I. Quebec
- J. Newfoundland Labrador
- K. Nova Scotia
- L. Prince Edward Island
- M. New Brunswick

WIRELESS PLAN

2. Which wireless company are you a customer of? (For your mobile phone)

- A. Rogers Wireless
- B. Bell Mobility
- C. Telus Mobility
- D. Freedom Mobile
- E. Koodo
- F. Fido
- G. MTS Bell
- H. Vidéotron
- I. Other: *TEXT BOX RESPONSE*

3. How long have you been with the wireless company? (# of years)

TEXT BOX RESPONSE

4. Do you currently have an accessibility plan with the company? Describe the plan, how many GB do you pay for, and how much monthly do you pay?

TEXT BOX RESPONSE

5. Are you satisfied with the accessibility plan, if not, if anything, what would make your wireless plan up to your satisfaction?

- A. Yes, I am satisfied
- B. No, I am not satisfied, please explain why not: *TEXT BOX RESPONSE*

INTERNET COMPANY

5. Which internet company are you a customer of? (For your internet at home)

- A. Rogers
- B. Bell
- C. Telus
- D. Shaw
- E. Other: *TEXT BOX RESPONSE*

6. How long have you been with the internet company? (# of years)

TEXT BOX RESPONSE

7. Are you registered with Text with 9-1-1 with your wireless company?

- A. Yes
- B. No

8. Was Text with 9-1-1 registration satisfactory (easy or hard)?

- A. Yes, I am satisfied with Text with 9-1-1 registration process (easy)
- B. No, I am not satisfied with Text with 9-1-1 registration process (hard), please explain: *TEXT BOX RESPONSE*

9. Text with 9-1-1 - was the service satisfactory? (Did you use it and successful emergency services came)

- A. Yes, I am satisfied with Text with 9-1-1, emergency services arrived, no problems.
- B. No, I am not satisfied with Text with 9-1-1, please explain why not: *TEXT BOX RESPONSE*

10. Do you use IP Relay Services?

- A. Yes, I use IP Relay Services
- B. No, I do not use IP Relay Services

11. Which company do you use IP Relay Services with and how long?

TEXT BOX RESPONSE

12. Was IP Relay Services satisfactory?

- A. Yes, I am satisfied with IP Relay Services
- B. No, I am not satisfied with IP Relay Services, please explain why not: *TEXT BOX RESPONSE*

13. Have you used customer service? Either online help or on phone.

- A. Yes
- B. No

14. Customer service - was it satisfactory?

- A. Yes, I am satisfied with customer service

- B. No, I am not satisfied with customer service, please explain why not and how it can be improved: *TEXT BOX RESPONSE*

Your responses will help us write our Accessibility Report due on April 16, 2018. Thank you for completing our DWCC internal survey!

FRENCH - survey link: <https://fr.surveymonkey.com/r/accessibiliteinterne>

1. Vous vivez dans quelle province canadienne ou quel territoire?

- A. Colombie-Britannique
- B. Yukon
- C. Alberta
- D. Territoires du Nord-Ouest (TNO)
- E. Saskatchewan
- F. Nunavut
- G. Manitoba
- H. Ontario
- I. Québec
- J. Terre-Neuve et Labrador
- K. Nouvelle-Écosse
- L. Île du Prince-Édouard
- M. Nouveau-Brunswick

PLAN SANS FIL

2. Vous êtes avec quelle compagnie sans fil ? (Pour votre téléphone portable) (choix multiple)

- A. Rogers Sans fil
- B. Bell Mobilité
- C. Telus Mobilité
- D. Liberté Mobile
- E. Koodo
- F. Fido
- G. MTS Bell
- H. Vidéotron
- I. Autre: (Entrez dans la zone de texte)

3. Depuis combien de temps êtes-vous avec cette compagnie sans fil? (Nombre d'années)
(Boîte de commentaire)

4. Avez-vous actuellement un forfait d'accessibilité avec cette compagnie? Décrivez votre forfait, combien de Go vous avez et le prix par mois que vous payez ? (Boîte de commentaire)

5. Êtes-vous satisfait de votre forfait d'accessibilité? Si non, qu'est-ce qui rendrait votre forfait sans fil plus satisfaisant?

- A. Oui, je suis satisfait(e)
- B. Non, je ne suis pas satisfait(e). Expliquez pourquoi : (Entrez dans la zone de texte)

SANS FIL ET L'INTERNET

6. Avec quelle compagnie internet êtes-vous ? (pour l'internet à la maison)

- A. Rogers
- B. Bell
- C. Telus
- D. Shaw
- E. Autre: (Entrez dans la zone de texte)

7. Depuis combien de temps êtes-vous avec cette compagnie internet? (nombre d'années)

- C. (Entrez dans la zone de texte)

TEXTO AU 9-1-1

8. Êtes-vous inscrit(e) au Texto au 9-1-1 avec votre compagnie sans fil ?

- A. Oui
- B. Non

9. Est-ce que le processus d'inscription au Texto au 9-1-1 était satisfaisant (facile ou difficile)?

- A. Oui, je suis satisfait(e) avec le processus d'inscription au Texto au 9-1-1 (facile)
- B. Non je ne suis pas satisfait(e) avec le processus d'inscription au Texto au 9-1-1 (difficile), expliquez svp : (Entrez dans la zone de texte)

10. Texto au 9-1-1 - est-ce que le service était satisfaisant? (Avez-vous utilisé ce service, et les services d'urgence sont-ils réellement venus).

- A. Oui, je suis satisfait(e) avec le Texto au 9-1-1, les services d'urgence sont arrivés, pas de problème.
- B. Non, je ne suis pas satisfait(e) avec le Texto au 9-1-1, svp expliquez pourquoi : (Entrez dans la zone de texte)

RELAIS IP

11. Utilisez-vous les services relais IP ?

- A. Oui, j'utilise les services relais IP
- B. Non, je n'utilise pas les services relais IP

12. Avec quelle compagnie utilisez-vous les services relais IP et depuis combien de temps ?

(Entrez dans la zone de texte)

13. Est-ce que les services relais IP sont satisfaisants ?

- A. Oui, je suis satisfait(e) avec les services relais IP
- B. Non, je ne suis pas satisfait(e) avec les services relais IP, svp expliquez pourquoi: (Entrez dans la zone de texte)

SERVICE CLIENTS

14. Avez-vous utilisé le service à la clientèle ? Soit en ligne ou au téléphone.

- A. Oui
- B. Non

15. Est-ce que le service à la clientèle était satisfaisant ?

- A. Oui, je suis satisfait(e) avec le service à la clientèle
- B. Non, je ne suis pas satisfait(e) avec le service à la clientèle ; svp expliquez pourquoi et comment ça pourrait être amélioré: (Entrez dans la zone de texte)

Vos réponses vont nous aider à écrire notre rapport sur l'accessibilité qui doit être finalisé pour le 16 avril 2018. Merci de nous aider à compléter notre sondage interne du CSSSC !

APPENDIX B

Wireless Accessibility Report Internal Survey Charts

OVERALL RESULTS CHARTS & GRAPHS

Chart 1 - Which province? (Total of 51 survey respondents)

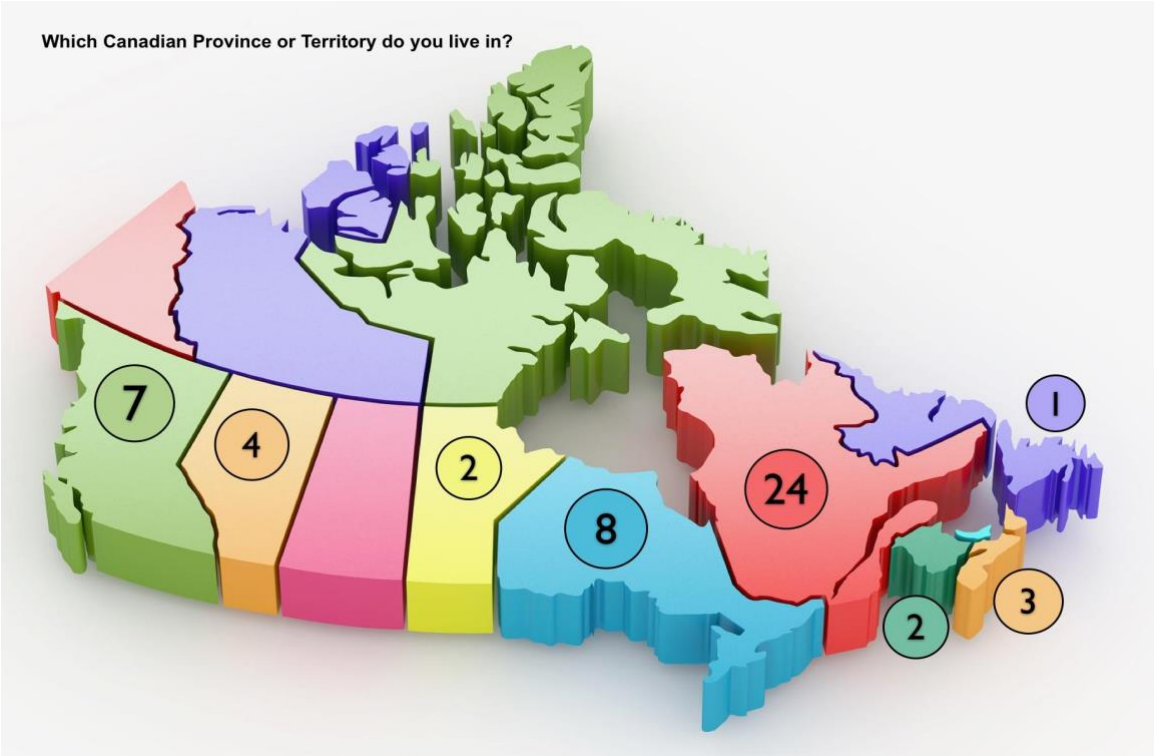
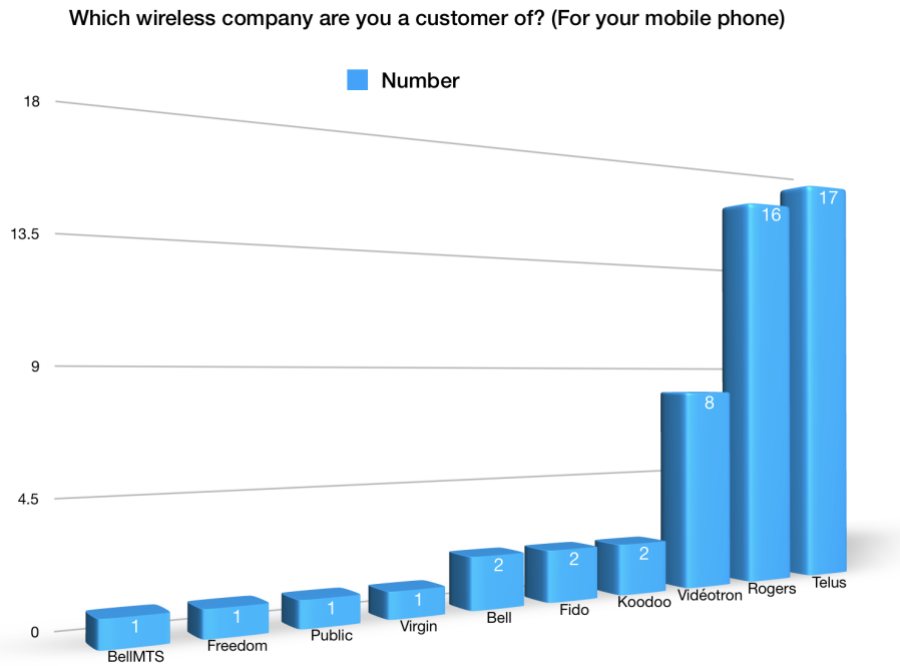


Chart 2 - Which wireless company are you a customer of? (For mobile phone)



How long have you been with the wireless company? (# of years)

Year $\cdots$ Avg $\cdots$



A 3D pie chart with a blue slice representing 'Yes' at 24% and a green slice representing 'No' at 76%. A legend to the right shows a blue circle for 'Yes' and a green circle for 'No'.

Response	Percentage
Yes	24%
No	76%

Chart 5 - Accessibility plan by all 51 survey respondents

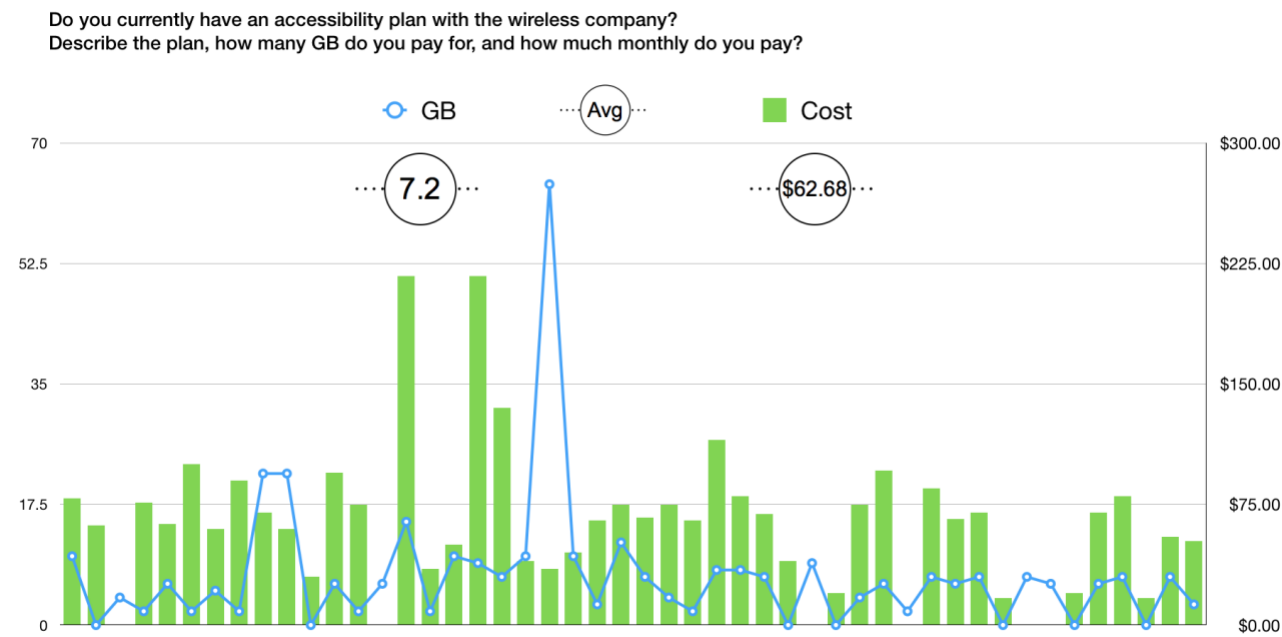


Chart 6 - Satisfaction with accessibility plan? (Yes/No)

Are you satisfied with the accessibility plan, if not, if anything, please explain what would make your wireless plan up to your satisfaction?

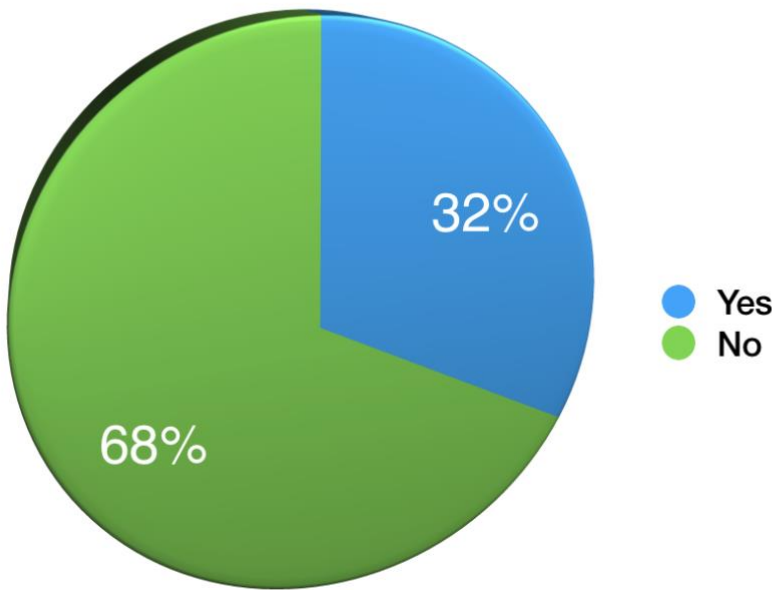


Chart 7 - Registration with Text 9-1-1

Are you registered with Text with 9-1-1 with your wireless company?

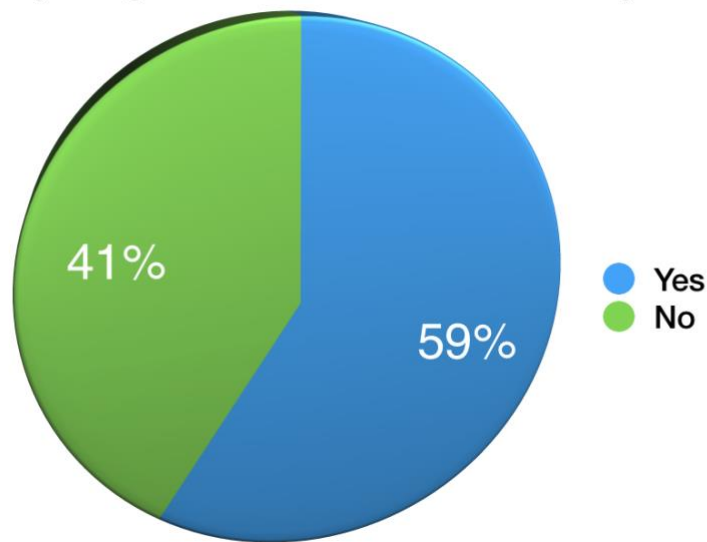


Chart 8 - Was registration for Text 9-1-1 satisfactory (easy or hard)?

Was Text with 9-1-1 registration satisfactory (easy or hard)?

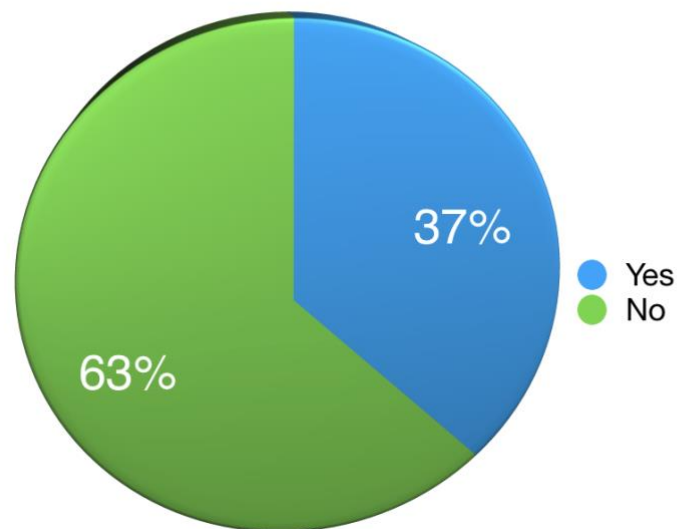


Chart 9 - Was Text 9-1-1 service satisfactory?

Text with 9-1-1 - was the service satisfactory?
(Did you use it and successful emergency services came)

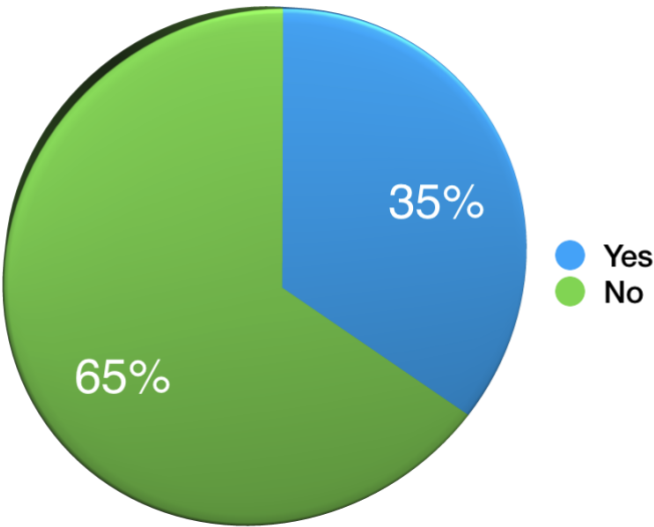


Chart 10 - Do you use IP Relay Services?

Do you use IP Relay Services?

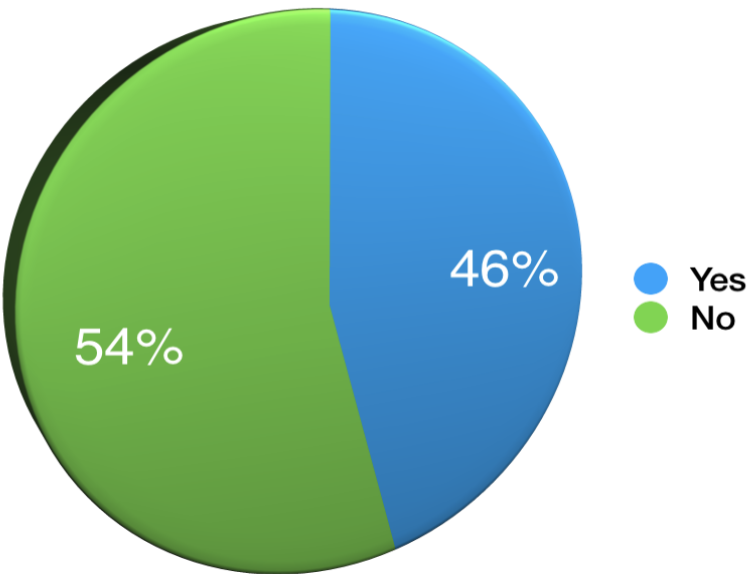


Chart 11 - Which company do you use IP Relay and how long?

Which company do you use IP Relay Services with and how long?

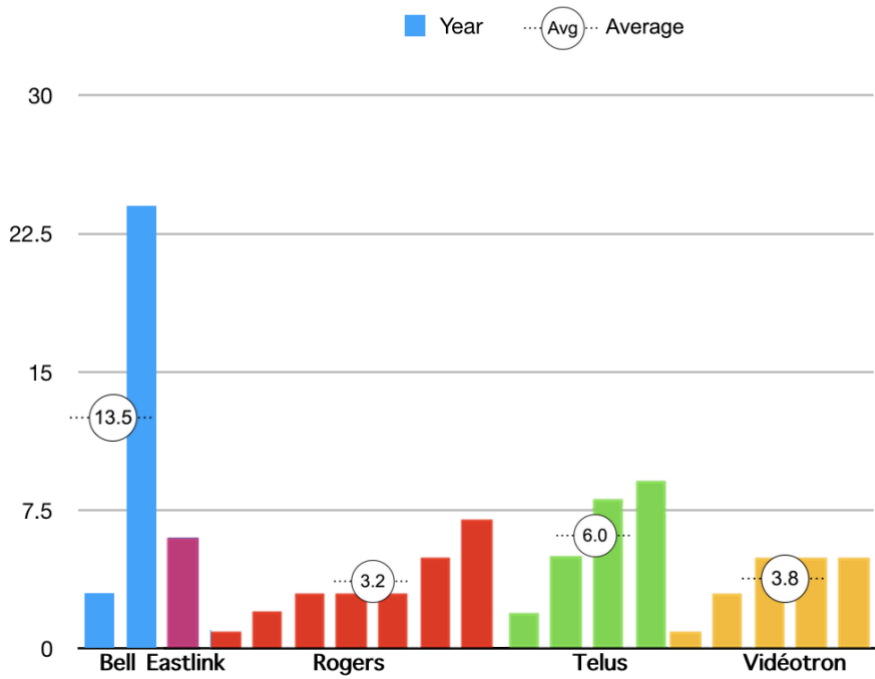


Chart 12 - Was IP Relay Services satisfactory?

Was IP Relay Services satisfactory?

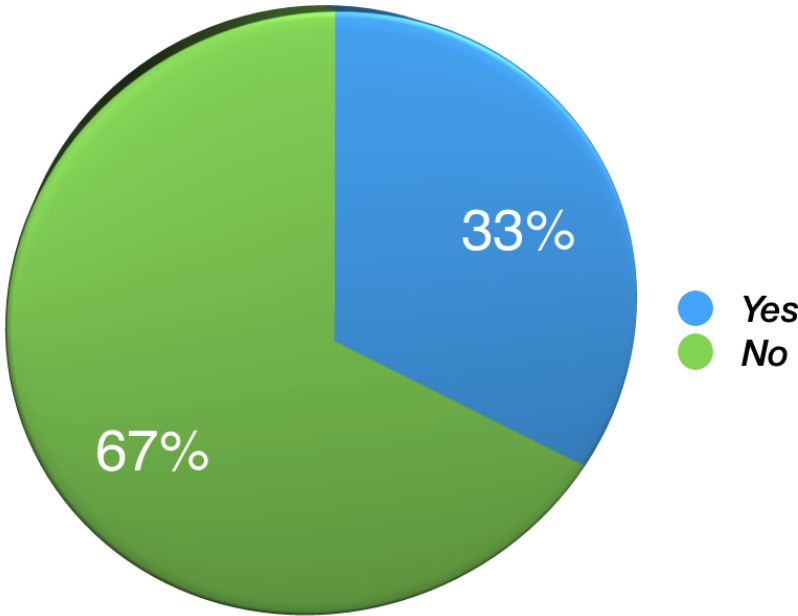


Chart 13 - Have you used customer service? Either online or phone.

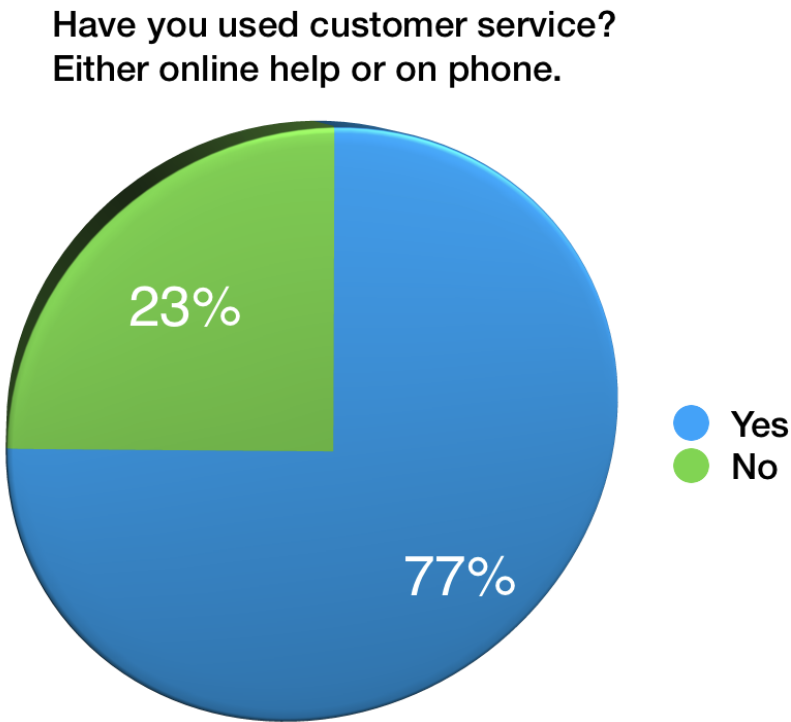
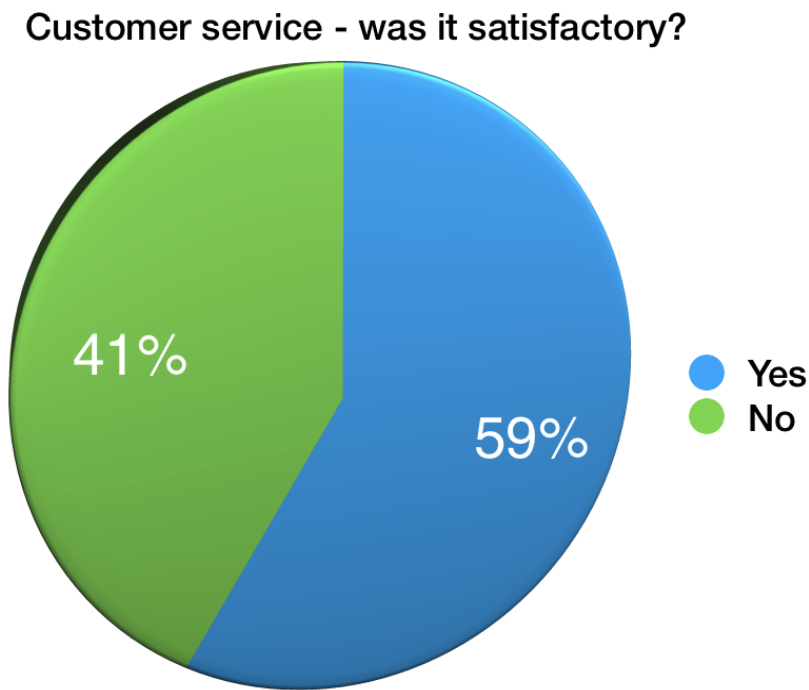


Chart 14 - Was the customer service satisfactory? (Yes/No)



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