



The Canadian National Society of the Deaf-Blind, Inc

**Canadian National Society of the Deaf-Blind**

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Mr. Claude Doucet  
Secretary-General  
Canadian Radio-Television and Telecommunications Commission  
Ottawa, Ontario K1A 0N2

**VIA EMAIL DISTRIBUTION and MyCRTC**

**Re: Intervenors or SSPs to be Provided by the Wireless Service Provider Companies**

Dear Secretary-General,

1. As per our joint document initially submitted as a procedural document to the record for CRTC 2020-178, we are a joint intervener with DWCC et al. which consists of the Deaf Wireless Canada Consultative Committee (DWCC), Canadian Association of the Deaf-Association des Sourds du Canada (CAD-ASC), and Canadian National Society of the Deaf-Blind (CNSDB).

2. This document is submitted as a supplementary document composed by CNSDB solely to the record of CRTC 2020-178, and separately to provide clarity for education and awareness to highlight the difference between interpreters and intervenors when it comes to accessibility for the Deaf-Blind in Canada. An overview of current intervenor service resources in Canada is examined to give public policy participants a glimpse into the challenges Deaf-Blind face when visiting wireless service providers.

**ABOUT CANADIAN NATIONAL SOCIETY OF THE DEAF-BLIND**

3. **CNSDB** was registered in 1985 as a national consumer-run advocacy association dedicated to helping Canadians who are deaf-blind achieve a higher

quality of life. The CNSDB advocates for new and improved services promotes public awareness of deaf-blind issues and disseminates information to empower individuals who are deaf-blind to become full participants of society. CNSDB provides expertise in accessibility related to the needs of individuals who are living with the distinct disability of DeafBlindness, which is different from deafness or blindness due to being unable to use one sense to compensate for the loss of the other.

4. 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](#) provided an estimate of the Deaf-Blind population in an earlier version of its website which is now available on [Junefest](#).

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**Intervenors and SSPs  
Provided by Wireless Service  
Providers (WSP) Companies**

**Submitted to:  
CRTC TNC 2020-178**

**August 27, 2021**



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## ABOUT DEAF-BLINDNESS

5. Deaf-Blindness is a dual sensory disability where the loss of hearing and vision is such that the individual cannot use either sense to compensate for the loss of the other. An individual is considered Deaf-Blind if they have both vision and hearing losses that limit their ability to independently communicate, access information, or travel on their own. Deaf-Blindness comes in a wide range of hearing and vision losses, from being hard of hearing or completely deaf combined with being low vision or completely blind.

6. The Deaf-Blind individual's communication preferences largely depend on the amount of hearing and vision loss that was present in childhood. If the child was born deaf or hard of hearing but became blind later, he/she tends to rely on trying to find ways to communicate, compensating for the hearing loss.

7. If a Deaf-Blind individual was born blind, he or she tends to lean toward tactile senses of communication, perhaps with tactile sign language, and then may find a way to accommodate their hearing, or not.

8. Individuals who are born fully Deaf-Blind tend to rely fully on tactile communications such as sign language communication.

9. Deaf-Blind individuals face unique challenges due to the loss of both vision and hearing, resulting in being unable to use either sense to make up for the loss of the other. This can cause a major barrier to access information, communicating with others, and getting help in an emergency.

6. The combined levels of vision and hearing loss are such that the Deaf-Blind person cannot use their hearing to compensate for the loss of vision or vice versa.

7. For example, a Deaf-Blind person cannot travel and navigate independently if they cannot see traffic signals and flow and cannot hear well enough to audibly gauge traffic flow, resulting in the person's extremely limited in their ability to go anywhere without assistance. If a person's level of deafblindness is such that they cannot hear speech and cannot see to read lips or see gestures or written information, they cannot communicate independently.

## **DEAF-BLIND COMMUNICATIONS**

8. Individuals who are Deaf-Blind use a wide range of communication methods, including but not limited to; visual and tactile sign languages, two-handed manual, voice, lip-reading, large print or electronic notes, Braille, and object cues. In this section, we provide information about the first few communication methods.

### **Visual and tactile sign languages**

9. For those who use visual and tactile sign languages, with American Sign Language (ASL) and Langue des Signes du Québec (LSQ), there is also the addition of ProTactile (PT) which supports access to the world that surrounds a Deaf-Blind person through touch. PT is a whole, rounded approach where both parties exchange information through touch. PT is based on a socio-cultural philosophy that reflects the Deaf-Blind world, which includes language (PT ASL), the Deaf-Blind culture, and their community. PT is not one way, PT is a reciprocal language, goes both ways between two people (or more) communicating. Like any other language, PT is constantly evolving. Most importantly, PT encourages inclusion, autonomy, and equal access.

### **Two-handed manual alphabet**

10. Two-handed manual alphabet is a tactile form of fingerspelling. Using this method, one person touches different areas of another person's left hand to indicate letters of the alphabet while spelling out words. Sometimes it is drawing handwritten letters on the palm of the hand. Short forms are used for common words and phrases. This method of communication is less common and is mostly used by people who are blind or have very low vision who become deaf or hard of hearing after they have already acquired language. It can be tiring to send and receive two-handed manual messages as it takes a lot of effort to create and decipher what is being said.

## **Voice and Lip Reading**

11. If the individual has some useful hearing, they may use hearing aids or cochlear implants and communicate with voice, with people speaking louder, closer up and slowly as needed. If they have some useful vision, they may also use lip reading. Some will use a combination of voice, lip-reading and signing. Lip-reading also places a strain on the eyes and may require optimal brightness to be done successfully. It can also take extra effort and be fatiguing over time.

## **DEAF-BLIND COMMUNICATION ACCESS**

12. Deaf-Blind participating in public events often require one or both of the following supports:

- a. Intervenors or SSPs, who are sometimes hearing, sometimes Deaf, depending on the Deaf-Blind individual's preferences and the circumstances.
- b. Interpreters, sometimes hearing, sometimes Deaf, depending on the individual's preferences and the circumstances.

## **Deaf Interpreters for Deaf-Blind Individuals**

13. Oftentimes members of the Deaf community start interpreting out of personal interest to ensure Deaf-Blind are included, and then over time with experience, informal and formal training opportunities, they pick up professional interpreting skills and training, become members of the professional interpreting associations, and follow and adhere to a strict code of ethics and professional standards. In the United States, they are formally called Certified Deaf Interpreters (CDIs) but here in Canada, it is still quite fairly new and it is starting to pick up, with the usage of the term "Deaf Interpreters".

14. At public events or workshops, to follow what is being presented, while a hearing interpreter is standing in front of the audience standing next to the public speaker, in the audience, Deaf-Blind in attendance would have Deaf interpreters. These interpreters are Deaf themselves who take the voice to sign language interpreter's message and relay it to the Deaf-Blind individual through various means of interpreting options:

- a) Sitting at a proximal distance from the Deaf-Blind individual, watching the Deaf interpreter, and mirroring what the interpreter on stage or the signing presenter is saying.
- b) Sitting close to the Deaf-Blind person with hand on hand, for visual-tactile communication or sign language, or PT, communicating what the presentation message is.

## **Intervenors or Support Service Providers (SSPs)**

15. An Intervenor (also called a Support Service Provider (SSP)) is a trained professional (in a paid or volunteer capacity) who facilitates access to information and interaction between an individual who is Deaf-Blind, their environment, and other people. Intervenors have expertise in various methods of communication used by individuals who are Deaf-Blind, orientation and mobility techniques, sighted guiding, providing visual, auditory and environmental information, and they possess an understanding of Deaf-Blindness and its impact. Intervenors should have and follow a Code of Ethics and are required to provide confidentiality and respect the culture of the Deaf-Blind community. They strive to offer quality and professional services to every person they support and adapt to meet the individual needs of each person they work with.

16. If going to attend a public event, such as a workshop or public presentation, Deaf-Blind will often request intervenor or SSP services as they need guidance for the following:

- travelling to get to the public presentation or event,
- knowing where various resources are available (i.e. food, drink, restroom),
- knowing where obstacles are located (i.e. stairs, carpets, chairs, etc.)
- interacting during social breaks during the event(s),
- perhaps understanding the event in conjunction with a Deaf interpreter (or without),
- leaving the public presentation to travel back home.

17. While shopping, the Deaf-Blind face bigger barriers (including with wireless service providers). Some of those include but are not limited to:

- getting to retail stores on their own due to being unable to travel safely and independently, and having trouble navigating unfamiliar environments,
- being unable to communicate with retail store staff due to not being able to see to write notes or hear to have a voice conversation, and also due to a lack of training of retail store staff to accommodate appropriately,
- not seeing or hearing about information that is distributed in mainstream media,
- not being able to make a voice, VRS, or relay call independently due to the combination of deafness and blindness.

Deaf-Blind individuals have unfortunately become used to having very limited or no access to services that would enable them to do all the above things.

18. Services an Intervenor / SSP might provide while visiting a wireless company store:

- Transportation and sighted guiding assistance in order to safely travel to and from the store and navigate around the store,
- Can help find a salesperson to speak to,
- Facilitate communication with store staff, using the Deaf-Blind person's preferred communication method(s)\*,
- Provide auditory and visual information about the devices,
- Describe the environment and layout of the store,
- Note-taking (especially with complicated plan details, etc.), and

\*Note: These communication methods might include (as described above), but are not limited to, voice-over, sign language or tactile sign language, large print notes on paper or electronic device, 2 hand manual, braille and others.

**19. The Intervenor / SSP may sometimes team with a sign language Interpreter or a Deaf Interpreter, as per the Deaf-Blind person's communication needs.**

### **Deaf-Blind Telecommunications Accessibility Key Points**

Deaf-Blind individuals have a great need for accessible technology that allows them better access to communication, information and emergency services. Accessible technology, combined with wireless and internet services (data, text, voice) increases independent access to things that are inaccessible in other formats.

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21. It is worth asking how Deaf-Blind individuals *can* learn about the resources available to them.

22. While Deaf-Blind individuals face an even greater need for accessible technology, high costs of internet services, especially data, create huge barriers. Those who have the greater need also face greater barriers to accessing what they need.

23. Deaf-Blind face greater barriers to employment, resulting in lower-income. This could be attributed to a lack of access to technology.

24. For example, many Deaf-Blind missed out on the 10 GB for \$60 flash sale plans in December 2017 because they did not find out about them in time, these individuals were unable to get to the retail stores, make phone calls or arrange assistance they

needed to do it, within a very short time. Deaf-Blind individuals were at a tremendous unfair disadvantage.

25. The combination of deafness and blindness results in Deaf-Blind individuals being more dependent on accessible technology that they cannot always afford. Devices such as iPhones, iPads and others come with built-in accessibility such as screen readers, Braille display connectivity, magnification, high contrast colour options and more, that allow Deaf-Blind users greater independent access to information and communication. There is a large range of accessible apps that further assist with access to information that they would otherwise be unable to access. This includes information related to transit and wayfinding, weather and natural disaster alerts, news, text or audio-video communications with others, including emergency services, websites, documents and much more. These essential devices and affordable data plans are essential to increased safety, independence and inclusion in society.

26. For Deaf-Blind individuals to benefit from accessible devices, they must be able to access businesses that sell them along with affordable plans. There are often significant barriers, such as those mentioned above, that make it difficult or impossible for the Deaf-Blind to independently access retail stores.

27. Additionally, Deaf-Blind individuals have a greater need for accessible Text with 911 (T911 services) because they are much more vulnerable in emergencies and have far fewer ways of accessing help.

## **OVERVIEW OF THE CURRENT INTERVENOR SERVICE PROVISIONS IN CANADA**

28. Across Canada, the provision of Intervenor / SSP services varies widely. There is no standard provider that the Deaf-Blind can get services from on-demand. Those who have Intervenor / SSP services will typically only use services from their specific service provider. Intervenor / SSP services do not typically provide services to people who are not their clients. Additionally, every Deaf-Blind person's needs are unique and as such, their need for Intervenor / SSP services must be tailored to their individual needs. Often, this results in the Deaf-Blind person only working with specific intervenors / SSPs who possess the qualities, characteristics, and skills that make them an appropriate match for the particular person and their situation.

29. For example, a Deaf-Blind person who is hard of hearing and uses voice-over may require an Intervenor / SSP whom they are familiar with and understand that person's voice. A Deaf-Blind person who uses tactile sign language would benefit from a familiar Intervenor / SSP that has the level of tactile sign language skills matching their needs.

30. When one is Deaf-Blind, the combined loss of both hearing and vision can mean that the person requires an Intervenor / SSP whom they are familiar with and understand well. This means they may have a preferred person from their regular service provider as opposed to a random person from another agency whom they have never worked with before and who would be less likely to meet their needs.

31. Having a familiar person as your Intervenor / SSP allows for much clearer communication and understanding, which is essential when making decisions on the appropriate mobile device and plan while entering into a contract. As such, it is not an option to designate any one Intervenor / SSP service provider as the one that Deaf-Blind people must use when visiting wireless service provider stores. All Deaf-Blind people must be able to access their preferred agency and familiar Intervenor / SSPs while having the cost covered.

32. Additionally, different service agencies tailor their services to the unique needs of the clients they serve. For example, agencies that provide services to the congenitally Deaf-Blind provide a type of service that is significantly different from what acquired Deaf-Blind individuals would need and use. The type of services provided by congenital-based Intervenor / SSP agencies would generally be considered inappropriate and unacceptable to the acquired Deaf-Blind (see paragraphs 1 to 4 for more information about why).

33. Also, most Canadian provinces provide limited or no Intervenor / SSP services to those with acquired deafblindness. They are also different organizations with no relationship to each other in different provinces - not branches of a Canada-wide organization. The primary provinces that provide services to the acquired Deaf-Blind are Ontario, Manitoba, Saskatchewan, Alberta and British Columbia.

34. Ontario provides the most services, while the other above-mentioned provinces provide more limited services. Of those provinces, those living in or reasonably close to major cities where services are based are more likely to have access to services. Those living in smaller communities a distance away from the cities, where the services are typically based, tend to have less or no access to services.

35. To be clear, it would be inappropriate and unacceptable to try to designate a specific agency in any one province because none of them serve all Deaf-Blind people in that province. In some cases, some agencies cover certain regions and would not be equipped to adequately cover someone that is currently not in their region.

36. Deaf-Blind people who do not have a local Intervenor / SSP service provider may have no option but to hire someone privately. People who have very limited access to Intervenor/ SSP services may not have enough services available to visit a wireless

service provider store, in addition, to attend to the essentials of life that they need the services for.

37. The Deaf-Blind should not have to pay out of pocket in order to visit a wireless service provider store to buy a new phone, get a new plan or change their existing plan, especially when Deaf people can have their Interpreter costs covered. It is also possible that the Deaf-Blind person's service provider may require them to have the cost covered when another entity should cover it. Also, if the person prefers to book privately for privacy, convenience and timeliness and to choose their own Intervenor / SSP, they should be able to do this and have it covered.

38. Additionally, some Deaf-Blind people may require a combination of Intervenor / SSP and Interpreter or Deaf Interpreter, which must be provided.

## **CONCLUSION**

39. In conclusion, CNSDB determines that wireless service providers must provide the appropriate services for the Deaf-Blind customer, as determined by the individual. Currently, there are many gaps in service provisions, including in locations where intervenor services are not available or only available at cost to the individual. This means that wireless service providers are missing out on serving a vital aspect of our community, Deaf-Blind individuals, who could greatly benefit from the services wireless service providers provide.

\*\*\*\*\*End of Document\*\*\*\*\*