



COMITÉ POUR LES
SERVICES
SANS FIL DES
SOURDS DU
CANADA

Canadian
Association of the Deaf



Association
des Sourds du Canada



DWCC et al. RECOMMENDATIONS for CRTC 2020-178: WIRELESS ACCESSIBILITY

DWCC et al. hereby make the following twenty (20) recommendations for the proceeding TNC 2020-178:

RECOMMENDATIONS SUMMARY - MYSTERY SHOPPERS

Retail Store Experience

1. Establish and designate *Accessible Centre of Excellence* wireless company flagship stores.
2. Produce ASL and LSQ videos that announce and describe where the designated accessibility flagship stores are located.
3. Provide designated in-store tablets such as iPads that play the ASL and LSQ Wireless Code videos.
4. Mandatory, uniform, consistent, and frequent staff orientation and training on accessible company services and products, including operating store-designated iPads that contain playback of ASL and LSQ Wireless Code videos.
5. Having system-wide Accessibility Plan options listed on Point of Sales (POS) systems, both website and in-store terminals, including in-store and e-commerce sites.

In-Store Accessible Communication Services

6. Employ Deaf, Deaf-Blind and Hard of hearing people with ASL and LSQ fluency into the designated Accessible wireless retail stores.
7. Where the option listed above is not feasible, in-person or VRI sign language services are provided with advance requests booked through the corporate accessibility department, with the in-store option of on-demand VRI services for walk-ins.

Wireless Service Providers Company Accessibility Departments

8. Publish designated Accessibility Department phone numbers and email addresses for direct contact.
9. Produce and distribute ASL and LSQ videos promoting the contact information of the Accessibility Department.
10. Implement and establish a designated Accessibility Department team of persons with disabilities and Deaf, Deaf-Blind, or Hard of Hearing ASL fluent staff to run and manage the department that focuses on accessible services and products.

Full report source link - [Unlocking the Mystery Shopping Experiences...](#)

RECOMMENDATIONS SUMMARY - WIRELESS ACCESSIBILITY SURVEY

Accessibility Plans

11. **All accessibility plans are to be reconsidered and redefined with new criteria.**
 - a. Consistently high-speed (no intentional slow down)
 - b. No network management (throttling) and exempt from speed pass
 - c. Provides built-in unlimited data access to Canada VRS app
 - d. No additional cost for phone forwarding to VRS number
 - e. No additional cost for a text transcript of an incoming voicemail
 - f. No limits for the number of accessible people on the shared plan
 - g. **NEVER EXPIRES** or adjusts/changes regardless of the situation

12. **DDBHH Canadians are allocated true unlimited data accessibility plans with no soft GB limits for functional equivalency¹:**
 - a. Deaf, Deaf-Blind and Hard of hearing Canadians should not be experiencing the de-prioritization² of data usage, and
 - b. Unlimited video data, Unlimited texting, Unlimited voice calling, and
 - c. DDBHH are never penalized or paying overages.
 - d. The cap of the price of these data plans with an accessibility plan applied is **\$70.00 CAD** before taxes.

13. **Accessibility Plans cannot be refused if there is clear proof that the person qualifies.**

Wireless Service Corporations

14. **Corporate and Storefront locations need consistent training and awareness about Accessibility Plans.**

15. **Administrative monetary penalty systems are established to ensure consistency of accessibility information by the salespersons.**

Customer Awareness

Wireless Service Providers

16. **Create ASL and LSQ videos explaining Company-specific Accessibility Plans with details.**

¹ National Association of the Deaf (NAD) - <https://www.nad.org/about-us/position-statements/position-statement-on-functionally-equivalent-telecommunications-for-deaf-and-hard-of-hearing-people/>

² WhistleOut: *Fact: A Truly Unlimited Data Plan Doesn't Exist*, (Angelo illumba, 2018) - [link](#)



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Canadian Wireless Telecommunications Association (CWTA)

- 17. Create ASL and LSQ videos explaining:**
- Information about Accessibility Plans
 - Unlimited Built-in access to Canada's VRS.

Canadian Administrator of Video Relay Services (CAVRS)

- 18. Create ASL and LSQ videos explaining:**
- Data with Unlimited Built-in access to Canada's VRS
 - Data consumption rates for up to 2 hours of video communication (information on its website)

DWCC et al. and other DDBHH organizations

- 19.** Produce ASL and LSQ vlogs made available across Canada with information about proof of membership to organizations to qualify for WSP accessibility plans.
- 20.** Share Wireless Service Providers, CAV and CWTA's ASL and LSQ videos with DDBHH communities through social media and email distribution.

Full report source link - [A Stark Reality: Wireless Accessibility Issues and Challenges for Deaf, Deaf-Blind and Hard of Hearing Canadians](#)