



DEAF
WIRELESS
CANADA
COMMITTEE

COMITÉ POUR LES
SERVICES
SANS FIL DES
SOURDS DU
CANADA

Canadian
Association of the Deaf



Association
des Sourds du Canada



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

January 10, 2022

Dear Secretary-General,

Call for comments – Accessibility - mobile wireless service plans that meet the needs of Canadians with various disabilities, Telecom Notice of Consultation CRTC TNC 2020-178 - **Final Reply to CRTC RFI.**

Communication equity means providing ample and essential unlimited data for the Canadian sign language video user's video communication over the wireless networks. ~ DWCC et al.

Introduction

1. Deaf Wireless Canada Consultative Committee-Comité pour les Services Sans fil des Sourds du Canada (**DWCC-CSSSC**), and Canadian Association of the Deaf-Association des Sourds du Canada (**CAD-ASC**), Canadian National Society of the Deaf-Blind (**CNSDB**), [collectively, **DWCC et al.**] files its final reply following the procedures set out in CRTC TNC 2020-178 as amended. In these Final Reply Comments, DWCC et al. file comments on the responses to CRTC's Request for Information (**CRTC RFI**) to participating parties.
2. DWCC et al. recognize the importance of accessibility for Deaf, Deaf-Blind and Hard of Hearing (**DDBHH**) mobile wireless service provider consumers in Canada.

DWCC et al. Reply to Responses to CRTC's RFI

3. DWCC et al. acknowledge and reviewed the December 10, 2021 replies to the **CRTC RFI** from mobile wireless service providers (**WSPs**) as follows: Bell Canada, TELUS, Rogers, Shaw, Canadian Wireless Telecommunications Association (**CWTA**), SaskTel, Quebecor (Videotron), Sogetel, and other consumer groups such as the Canadian Deaf Grassroots Movement (**CDGM**), and DHH Coalition.
4. Due to time and logistical challenges, DWCC et al. has limited our review and responses only to the participating parties listed in paragraph 3.
5. Any failure on the part of DWCC et al. to respond to any specific intervention or any issue raised by any participating party should not be viewed as agreement with the said intervention or issue.
6. DWCC et al. split up the review and written work among multiple consultants, each analyzing a matrix of all responses to each question. We, therefore, will submit each of the consultants' comments to the replies split in separate documents according to the question number.
7. DWCC et al. will examine and respond to the questions one by one in each document.

A friendly reminder

8. Regarding the companies' resistance to our survey and its evidential or "anecdotal" results, DWCC et al. would like to remind everyone that the CRTC allowed us to do our survey work. The Commission communicated this in TNC 2019-57 just before it was migrated to the new "designated forthcoming proceeding" now known as this current proceeding TNC 2020-178. This is evident with the wording: "*Commission considers that this survey should be submitted on the record of the forthcoming proceeding,*" which indicates that it wishes to weigh in the Deaf community members' experiences regarding wireless accessibility. Our consumer group provides the two links for your reference:

November 21, 2019 - <https://crtc.gc.ca/eng/archive/2019/lt191121.htm>

December 4, 2019 - <https://crtc.gc.ca/eng/archive/2019/lt191204b.htm>

9. Further, the surveys were created as we chose because the DDBHH persons are uncomfortable with written forms. This reluctance necessitates the collection of anecdotal feedback rather than "standard" data collection (written feedback) to reflect the community's opinions and thoughts accurately. DWCC et al. hope this explanation will increase understanding and empathy for the DDBHH community.
10. DWCC et al. look forward to the CRTC's balanced policy analysis for this proceeding, including the 630 Deaf, Deaf-Blind and Hard of hearing community's experiences and responses gathered through our survey projects. DWCC et al. greatly appreciate the participation they had in this proceeding.

Other accessibility groups

10. Regarding DWCC's Response, keep in mind that when we refer to Deaf, Deaf-Blind, and Hard of hearing wireless customers, our focus is on those who use sign language as a primary means of communication. Deaf-Blind customers have additional accessibility needs besides the video calling issue, with more dependence on wayfinding apps. Hard-of-hearing customers aren't always necessarily those that depend entirely on sign language for communication but may, in addition, use voice carry over and speech-to-text applications, including when they use VRS. There is no "one size fits all."
11. While DWCC et al. participate and share the view of Deaf, Deaf-Blind, and Hard of hearing wireless consumers, they by no means are excluding any particular accessibility group. DWCC et al. prefer that these accessibility groups speak from their own experiences. Many in the DDBHH community share other disabilities, such as mobility limitations and neuromuscular diseases (MS, CF, and others). Therefore we are interested in what expertise could be contributed by organizations specializing in those other disabilities.
12. DWCC et al. want to make clear that it is their standpoint to support the concept that any accessibility plan should also be available to the following consumers with communication disabilities: persons who are blind, visually disabled, intellectually or developmentally delayed, language deprived, or have low literacy levels.

13. At the same time, we focus on sharing perspectives and stories from those self-identified as Deaf, Deaf-Blind or Hard of Hearing who use sign language with 21st-Century video calling communication equity needs.
14. DWCC et al. appreciate the Commission's consideration of its Response to other parties' replies to the **CRTC RFI** and look forward to the policy outcome of this proceeding. Should you have any questions, please do not hesitate to contact all of us.
15. DWCC et al. wish to show their gratitude to the Commission for the opportunity to participate and present Deaf, Deaf-Blind and Hard of Hearing Canadians' experiences with wireless access to the Commission for its regulatory examination.
16. Should you have any questions, please do not hesitate to contact all of us.

Regards,

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All Parties to TNC 2020-178

**Hereby submitted by: RFI Response Documents Team
(both December 10, 2021, & January 10, 2022)**

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