

DWCC et al. Response to Q1 Requiring Proof of Eligibility Replies

This document from DWCC et al. focuses on requiring proof of eligibility for an accessibility plan.

General comments

1. DWCC et al. observe that generally speaking, the WSP's perspective is that the Commission does not need to intervene with this proof of eligibility validation issue. However, with the introduction of the Accessible Canada Act, CRTC has become responsible for developing standards for the telecommunication industry about accessibility. The WSPs are overlooking this important point.
2. DWCC et al. observe a common trend in the companies' replies that believe the status quo is good enough. Their positions are similar in that they do not want the Commission to prescribe how wireless service providers ("WSPs") verify eligibility for accessible wireless services. Yet they do state that there should be verification processes to ensure that the benefits do not go to "people without disabilities who are intending to illegitimately access discounts" (Quoted from CWTA's reply to RFI).
3. In reviewing the proposed options for verifying customers' eligibility for the accessible plan and services, the WSPs and the CWTA strongly emphasize that the process prevents unauthorized people from claiming the special rates and services. DWCC et al. do not know the numbers of attempted fraudulent applications and successful registrations to comment on whether this is a significant concern. Our accessibility group would like to inquire if the companies have any proof or data that shows the number of attempts able-bodied or hearing people have tried to claim the special rate?
4. Telus stated it reserves the right to request verification at its discretion to mitigate potential abuse cases. In our view, when a WSP reserves the right to request confirmation at its discretion, this may lead to possible confusion and prolonged waits for the Deaf, Deaf-Blind or Hard of Hearing customer.
5. In addition, if the determinations are made at the discretion of each service provider, inequities and potential errors are possible. Shaw, for example, stated that it allows customers to self-identify their status of specified disabilities to determine eligibility for accessibility discounts and or/services. Yet it doesn't specifically say Shaw's approved ways of self-identification.
6. While DWCC et al. acknowledge the efforts by the companies to establish verification criteria, it needs to be re-emphasized that the whole process of verification of eligibility is cumbersome for both the customer and the customer service representative. The system is not readily available and takes more time, where the customer agents are contacting their supervisors for further instructions and so forth.
7. Society has constantly disempowered persons with disabilities by taking away their decision-making and choices by solely using the medical or rehabilitative perspective, which makes the person with the disability feel like the others do not believe that they have their barriers.

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8. DWCC recognizes that Videotron already has an outlined system in place by self-identification as a person with a disability by completing a form to this effect. Yet we question if the written form is easy or accessible for those with disabilities to complete without adding more barriers.
9. It appears that Videotron's criteria for verification lean more towards the medical and rehabilitative approach. An intensive list of proof of eligibility is quite onerous, listing approved certificates related to medical, vision, physical rehabilitation, disability, and one advocacy organization, but does not include a recognized Deaf-affiliated organization such as ReQIS (Réseau Québécoise pour L'inclusion Sociale).¹ It also mentions using documentation from the Disability Tax Credit, which would involve private information that might not be appropriate to share.
10. DHH Coalition and CDGM, in DWCC et al.'s view, did not provide adequate details or context to be responding to this question, but they align with our group in wanting the customer experience to be a more streamlined and efficient process. Registration with Video Relay Services is a good suggestion as a potential route to verifying eligibility.
11. DWCC et al.'s position is not to challenge the fact that the companies have made efforts but essentially to point out that the verification system could be better designed to make the customer experience more user-friendly and more widely accessible.
12. DWCC et al. recognize that the CWTA has consulted with the consumer groups, incorporated the feedback and concerns of accessibility issues, and included some recommendations.

Promotions on WSP Websites

13. The examples below show that telecommunication providers would greatly benefit from closer collaboration with accessibility groups and experts with lived experience to make their information reach consumers more effectively and at a more significant benefit to both the companies and their customers.
14. The websites of Bell, Telus, Rogers, and Shaw are not "friendly" to those who have low vision or who are Deaf-Blind. There is no option to change the webpage view to high-contrast, for example - a dark background with white or yellow texts.
15. The link for accessibility information page(s) is often at the bottom of the home page, in small text size. This link needs to be placed higher on each of the wireless service provider sites' arrival webpage to make it easier for those who need to find it on the page.

¹ Réseau Québécoise pour L'inclusion Sociale - [link](#)

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16. The Accessibility Services Centre (ASC) is an excellent initiative by Bell providing comprehensive information. Yet it is not easy to navigate to get the accessibility discount through the Bell Accessibility Centre. As one person described it:

"A person has to click on "Hearing Solutions," then click on "Accessibility Discount." There, it states: 'To find out if you qualify for the \$20/ month discount, please contact the Accessibility Services Centre by calling #1-800-268-9243.' It is not clear who is to make contact initially - the DDBHH customer to call the ASC from home, or is the customer representative in the store to make the call on their behalf? (Personal communication given to DWCC et al. team member.)"
17. There need to be more direct avenues established on the ASC page, such as prominent placement of Bell's phone number where customers can call direct to the Accessibility Centre, through the Video Relay Services or provide a direct e-mail address to the Accessibility Services Centre.
18. A particular concern is about the readability levels of accessibility information - especially for many DDBHH consumers, who may read at lower literacy levels for various reasons. A scan of Bell's information related to Accessibility Discount and Identification Requirements shows Flesch-Kincaid reading levels of (Grade) 13.2 and 11.2 respectively, with readability scores of 27.7 out of 100 - with higher scores indicating greater ease of reading and understanding. A score of 60 or above is acceptable.
19. Telus has similarly challenging reading comprehension issues - their microsite for discounted mobile rate plans, where the text description of the rates and how to apply had a Flesch-Kincaid readability grade level 10.9 and a Flesch Reading Ease score 47.7 out of 100; higher scores showing greater ease of reading and understanding, 60 or above are acceptable.
20. The above examples show that telecommunication providers would greatly benefit from closer collaboration with accessibility groups and experts with lived experience to achieve the goal of making Canadian social and economic sectors more accurately reflect the most current efforts in making accessibility genuinely equitable.
21. DWCC has, repeatedly, since its inception in 2015, tried to bring attention to the fact that other jurisdictions such as the United States do provide options for verification of persons with disabilities for telecommunications and wireless accessibility. In its Intervention of August 27, 2021, DWCC et al. offered detailed information on AT&T in the United States, *rate plans developed for customers who, because of a disability, are unable to effectively communicate over voice networks.*² The company's options ([link to the form](#)) are geared toward those with lower incomes.
21. DWCC et al. have in the past expressed concerns that illustrations on WSP websites and microsites have included images and graphics that are not current and may be viewed as stereotypical and too much focused on the medicalization. It wouldn't fit for all of those with hearing loss.

² AT&T Get information about Accessibility Plans - [link](#)

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22. The federal government department agency Accessible Canada social media³ has shown three different icons for hearing accessibility. For example, the "Slashed-ear" symbol to show hearing disabilities is not recognized by the signing DDBHH communities as being representative. This slashed ear symbol is in this example:



23. The interpreter and signing hands symbols would be appropriate for identifying video relay or remote interpreting on the wireless network. To be more specific, the interpreting symbol would be suitable for VRS or VRI services, while the two hands, as illustrated above, are for the video calling applications to wireless accessibility, as seen following:



24. The preferred image would be the signing hands which recognizes the Deaf who are from a linguistic and cultural minority that use sign language and use video calling as their mode of communication over the wireless network. An example would be this image:



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³ Accessible Canada Facebook - [link](#)