

DWCC et al.'s Response to Q2 Replies to Undue or Unreasonable Disadvantage

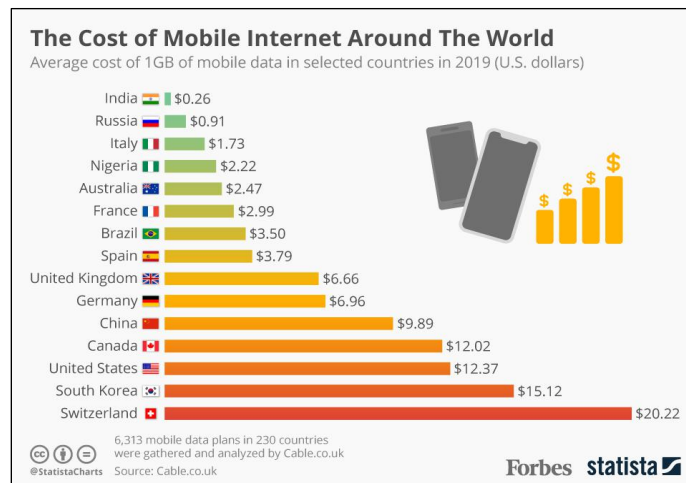
This document from DWCC et al. focuses on the query regarding undue or unreasonable disadvantage coming from CRTC's RFI Question 2.

1. DWCC et al. read all the responses (10 participating groups), and the general take is that there was no honest, direct answer to the inquiry by the CRTC by most of the participating parties. There was no in-depth analysis of DDBHH and disabled consumers' views of them being disadvantaged in receiving wireless services, which DWCC et al. brought to the table. The undue disadvantage is not limited to the technical aspects of video calling and the overage of data.
2. In addition, the service providers have not addressed how telecommunications, including wireless networks, have changed in the past two years due to the pandemic. DDBHH Canadians have become more dependent on internet and wireless communication to contact their community members. While many use their internet or wi-fi, others use their wireless accounts. In British Columbia, two organizations have received grants to donate iPads and Android phones to Deaf, Deaf-Blind, and Hard-of-Hearing Seniors, including them in weekly classes on using their devices. This project has generated improved mental health for the users.
3. The companies have generally said that "*Canada's three national wireless service providers are all voluntarily zero-rating use of the SRV Canada VRS video-conferencing application.*"¹ And the companies seem to stay laser-focused on the SRV Canada VRS issue, ignoring that it is not the only application for DDBHH Canadians who communicate using sign language used on a wireless network.
4. It is disappointing that the companies essentially dismiss the wireless consumer experience of the sign language users with blurry videos. We have a testimonial of one person who has directly experienced receiving a notification that their data limit was reached and then shortly after a video call came through by a Deaf person using sign language to the person walking on the street, and video was all of sudden blurry when usually it was clear. The notification received demanded to pay \$15.00 for three more GB to regain a high-speed connection again. This incident shows the undue disadvantage that is happening that must stop. There is a denial that this is happening, ignoring the anecdotal experience
5. DWCC et al. has submitted all the experiences in its interventions that provide scenarios and screenshots of where there are undue disadvantages for those who are Deaf, Deaf-Blind or Hard of hearing with the network management of wireless connections. With the determination that some of the practise thus far have caused discrimination of some harm to persons with disabilities, CRTC needs to mandate and direct the companies to ensure there is no throttle or blocking of any video communications by any network management.

¹ Shaw response to CRTC RFI questions - 10 December 2021.

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- Multiple sources all say the same thing: Canada leads the world to have the most expensive wireless services. An example case is the National Post which provides [an infographic](#) where one gigabyte of data in Canada would cost \$12.02, as seen in the following graph²:



- The near future will bring 5G and other improvements in wireless provision - what will this mean in terms of requiring new(er) technology, such as updated models of smartphones and tablets? Is there consideration of rate differentials as a result? People on fixed incomes and are at/below poverty rates will not be able to keep up with the rising costs inherent in new technology and service provision.
- The WSPs have not realized that if DDBHH and disabled consumers need more data, at higher costs, or from overage, compared to other Canadians, they cannot magically produce extra income to cover the costs, with many living on social assistance. To protect this 'extra' expense means they will have to forego some critical area of daily life - food, medicine, transportation, heat/electricity... if they are lucky to have enough leftover from housing costs. They choose communication as a priority over other life essentials, just as the Disability Alliance of BC stated in the *No Consumer Left Behind Final Report* report.³

*"Income of our clients typically less than \$1,000 per month; it could be even \$600 to \$700 per month. However, it is surprising to what degree some clients would pay for their communications services, even more than some essential services. A lot of discretionary income is already going to basic needs, so I'm surprised **how many clients are still willing to cut food and health expenses in order to retain their communications services and go to the food bank, for instance, instead.**" – Disability Alliance BC (Vancouver, BC)*

- No one should have to sacrifice living essentials to have total **communication equity**.

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² National Post: Canada's wireless costs continue to be the highest or among the highest in the world - Finnish Report - [link](#)

³ PIAC No Consumer Left Behind, Final Report - [link](#)