

DWCC et al. Response to Q6 Adoption of the Accessibility Plan

This document from DWCC et al. focuses on adopting the accessibility plan of CRTC's RFI Question 6.

1. Having statistical information concerning accessibility plans is crucial to understanding the CRTC's public interest obligations. It is the right thing to do.
2. While DWCC et al. recognize that the majority of the wireless companies (Bell, Telus, Rogers, Shaw, Sasktel, Videotron) use boilerplate responses about any of the four cited: [CRTC 2020-130](#), [CRTC 2010-961](#), Section 32 of CRTC *Rules of Practice and Procedure* (CRTC Rules), and Section 39 of the Telecommunications Act. The reasons that the companies provide are not up to the official standard. The companies have to offer a further and detailed rationale for not providing this information.
3. DWCC et al. view the companies' arguments as irrelevant as they come solely from the economic viewpoint. In reality, an accessibility plan is a social good, or social benefit, rather than just an economic one.
4. The Rogers reply stated: *In 2021 alone, there has been a 147% increase in customers with the discounts.* Additionally, Rogers said that in 2019 there was a 488% increase in accessibility plans. Both kinds of information are neither constructive nor beneficial. For example, how can we measure that the company's promotion and outreach are working if we do not have the actual numbers from one year to the next?
5. *"The CCTS continues to track **accessibility-related issues**¹ that appear in customer complaints, as requested by the CRTC and members of the accessibility community."* According to the Annual Reports by the Commission for Complaints about Telecommunication Services (**CCTS**)², an initial count returned a total of 157 complaints specific to wireless issues. These accessibility-related issues include "refused accessibility plans." This report shows why the companies must provide tracked statistics and data.
6. It is complex and challenging for DWCC et al. because they have had to remind the companies that the pool of people with disabilities, and even more so the Deaf, Deaf-Blind and Hard of hearing signing consumers, is very small compared to the more significant numbers of consumers in Canada. In reality, this concerns only a minuscule percentage of customers, according to our statistics³ specific to Deaf, Deaf-Blind and Hard of Hearing who rely on sign language for communication.
7. An example case, considering the Marketing composition, indicates that there has been **\$28.8 billion in revenues** for mobile telecommunications according to the 2019 Communication Monitoring Report 2020⁴, in infographic 2.1: "Overview of total telecommunication revenues" [here](#).

¹ **CCTS** Customer Complaints Accessibility related issues - [link](#)

² Commission for Complaints for Telecom-telecommunication Services (**CCTS**) Annual Report 2020-2021 - [link](#)

³ DWCC et al. Unlocking the Mystery Shopping Experiences of DDBHH Canadians in Wireless Service Retail Stores, 2021 - [link](#)

⁴ CRTC Communications Monitoring Report 2020 - [link](#)

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8. As of 2019, the CRTC has an obligation to the Accessible Canada Act and now, as set out in the recent TBRP CRTC 2021-215,⁵ to report any accessibility plan numbers and records. Therefore, reporting accessibility plan numbers are in the public interest. Accessibility plans are a social good or social benefit, not an economic good.
9. Accordingly, DWCC et al. respond that the WSP carriers have not met the expectations for confidential treatment set out by the CRTC, with accessibility plans as a social benefit.
10. Groups such as the DWCC et al. can assist the Commission in its decision making if they have access to this information by bringing their perspective to verifying or challenging the information submitted by the wireless service provider carriers.
11. Conversely, suppose the accessibility plan numbers are reported appropriately, it will also contribute to a more efficient process of participating in these telecommunications proceedings by removing the need to undertake expensive and duplicative work such as surveys where possible.
12. DWCC et al. recognize and support the topics/issues that DHH Coalition and CDGM mention in their Question 6 comments about customer services and their frustrations, highlighted in our consumer groups interventions. With more thorough reporting, the companies cooperate with the community members to improve their outreach and customer services.
13. If the CRTC may recall, in TNC 2017-33⁶, upon a review of text-based relay services, DWCC et al. uncovered international records of reporting from such countries as Australia, New Zealand, United Kingdom, and the United States, and sees that reporting numbers are not considered competitive when it needs to look at trends and patterns.⁷ This way, consumer groups can respond to these records. Please reference the outcomes of Telecommunication Regulatory Policy CRTC 2018-466⁸ paragraphs 159-165.
14. The accessibility plan numbers should be reported annually and accordingly to the decisions outlined in TBRP CRTC 2021-215⁹ according to the obligations set out by the Accessible Canada Act.

⁵ The Canadian Radio-television and Telecommunications Commission Accessibility Reporting Regulations - [link](#)

⁶ CRTC Telecom Notice of Consultation CRTC 2017-33 - [link](#)

⁷ DWCC et al. RFI Answers for CRTC TNC 2017-33 - [link](#)

⁸ CRTC Telecom Regulatory Policy on Review of the regulatory framework for text-based message relay services - [link](#)

⁹ CRTC Telecommunications and Broadcasting Regulatory Policy 2021-215 - [link](#)

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15. CRTC needs to make available, at the minimum, the generic WSP accessibility plan statistics annually as follows:
 - Total numbers of inquiries about the accessibility plans
 - Total number of accessibility plans per WSP
 - Comparative analysis for province and territory
 - Categorized statistics of those who self-identified as Blind, Deaf, Deaf-Blind, or Hard of hearing, late-deafened, and other categories of disabilities
 - Most common verification identification
 - Total number of denials or refusals of the accessibility plan

16. DWCC et al. also propose tracking the visits to the accessibility microsites where the accessibility plan information is located. Additionally, there must be enhanced communications with DDBHH consumer groups to ensure accessibility plan information is shared with the community. This concept was submitted by DWCC et al. interventions on August 27, 2021, regarding increased and targeted promotions and awareness of the accessibility plans in accessible formats, including ASL and LSQ videos.

17. CRTC has the responsibility for the standards for telecommunications accessibility according to the Accessible Canada Act. Currently, CRTC releases an annual Communications Monitoring Report¹⁰, and the CCTS releases its Annual and Mid-Year Reports¹¹, both transparent information sharing. This continued transparency would be beneficial with telecommunications-related accessibility data in one location.

18. DWCC et al. view that there needs to be telecommunications accessibility reporting available in either separate or chaptered within the Communications Monitoring Report. The reporting would include all of the TTY Relay, IP Relay, and Video Relay Service statistics combined into this report, along with Wireless Accessibility data and statistics. This project would be an excellent step for the Commission's assigned responsibility under the ACA.

19. This information subsequently allows DWCC et al. and all consumer and accessibility groups to comment and reference their consumer experiences.

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¹⁰ CRTC Communications Monitoring Report 2020 - [link](#)

¹¹ CCTS Annual and Mid-Year Reports - [link](#)