



DEAF  
WIRELESS  
CANADA  
COMMITTEE

COMITÉ POUR LES  
SERVICES  
SANS FIL DES  
SOURDS DU  
CANADA

Canadian  
Association of the Deaf



Association  
des Sourds du Canada



The Canadian National Society of the Deaf-Blind, Inc

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

**February 25, 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 – **Response to Requests for disclosure of information designated as confidential – Disclosure of Aggregated Information. (February 11, 2022)**

### Opening Remarks

1. The Deaf Wireless Canada Consultative Committee-Comité pour les Services Sans fil des Sourds du Canada (**DWCC-CSSSC**), the Canadian Association of the Deaf-Association des Sourds du Canada (**CAD-ASC**), and the Canadian National Society of the Deaf-Blind (**CNSDB**), [collectively, **DWCC et al.**] appreciate the effort the CRTC took to gather "the current number of customers that subscribe to an accessibility plan or who benefit from any type of discount related to accessibility." Thank you.
2. DWCC et al. focus on the perspectives of those self-identified as Deaf, Deaf-Blind or Hard of Hearing who use sign language with 21st-Century video calling communication equity needs. 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.
3. DWCC et al. re-emphasize the importance of accessibility plan statistics for all persons with disabilities, including Deaf, Deaf-Blind and Hard of Hearing (**DDBHH**) mobile wireless service provider consumers in Canada.

### CRTC Disclosure of Information

4. DWCC et al. acknowledge receipt and have reviewed the February 11, 2022 letter from the CRTC and read that the current "*aggregated total of all subscribers with accessibility-specific plans or discounts across all service providers...is 14,453.*"
5. CRTC further explains:  
*"This number is comprised of instances where subscribers receive specific discounts (on monthly service rates or on devices), or additional services at no additional charge (such as extra data usage or 4-1-1 services), or a combination of these, and the discounts or services are related to accessibility.*

*The staff has not included subscribers to generally available plans that – while they may be attractive to certain persons with disabilities – do not include accessibility-specific discounts or additional services."*

## **DWCC et al. Response**

6. While DWCC et al. appreciate this information, our position is that more comprehensive and cumulative information must be made available publicly on an annual basis, originating from quarterly reports from the companies to the CRTC.
7. The CRTC, applying the [Policy Direction 2019](#), the [Accessible Canada Act](#), and the results from [TBRP CRTC 2021-215](#), must ensure the availability of specific statistical reports regarding accessibility.
8. DWCC et al. have great interest in knowing how many of the total customers reported identified as blind, Deaf, Deaf-Blind, Hard of Hearing, and late-deafened.
9. As DWCC et al. mentioned in its Reply document to Question 6 (Paragraph 15, page 3<sup>1</sup>), the CRTC should direct the companies to provide the following disaggregated information:

*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*
10. If this information is not available at this time, then DWCC et al. desire that the CRTC direct the companies to start establishing a system of identification and categorization to be reported annually, beginning in 2023. This accessibility plan statistics information could be integrated into an accessibility-related reporting package that includes information mandated for text-based relay statistics reporting according to Telecom Regulatory Policy [CRTC 2018-466](#). This information, including VRS service delivery statistics, should be available to accessibility consumer groups to utilize in their assessment of service delivery within the Canadian telecommunications industry.
  11. DWCC et al. realize that perhaps because blind people and Deaf-Blind people have unique data concerns, accessible plans with sufficient data should be made available to these service users. In other words, create specifically identified accessibility plans suited to their use of high-data applications. Then another identified accessibility plan could be made for those who are Deaf, Deaf-Blind or hard-of-hearing sign language users. This arrangement might assist the companies in separating the statistical data.

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<sup>1</sup> DWCC et al. TNC 2020-178 Further Comments to Question 6 - [link](#)

## Response to the Aggregated Total Number

12. DWCC et al. find that the information supplied, **14,453**, in the CRTC Disclosure of Information, is relatively minuscule and disproportionate, compared to the number of industry subscribers as a total. The numbers derived from the Communication Monitoring Report 2021 show **32.4 million subscribers to wireless mobile services**.<sup>2</sup>
13. According to the total population in Canada at this time, 37 million, and according to the proportional findings in the Mission Consulting Report, in the table on Page 13 in Phase 9 ("Forecast of VRS users"),<sup>3</sup> the updated numbers would be 370,000 profoundly deaf. Of this number, approximately 37,000 could have sign language as their primary language and would be eligible for an accessibility plan.
14. Therefore, with the aggregated numbers supplied by the CRTC being that low, it reinforces DWCC's findings and position that the wireless service providers have failed to promote and maximize awareness of the accessibility plans appropriately. This failure contributes to the low total number reported in the CRTC Disclosure document. Specifically, the companies' arguments contradict DWCC et al.'s analyzed mixed research findings from a total of 636 participants and interventions such as its Mystery Shoppers Report<sup>4</sup>, A Stark Reality<sup>5</sup>, Intervention<sup>6</sup>, and its Reply<sup>7</sup> for TNC 2020-178.
15. The recommendations are summarized in the "One-Stop" Handout<sup>8</sup> document consisting of our list of recommendations from our two Reports, and of particular applicable interest relevant to this Response are copy-pasted as follows for your specific attention:

### **Mystery Shoppers Report - Page 50 - 51:**

#### **4. Mandatory, uniform, consistent and frequent staff orientation and training on accessible company services and products, Including store-designated iPads that contain playback of ASL and LSQ Wireless Code videos.**

- a. Staff must be well-trained and well-informed on all Accessibility services, devices and features, especially at the designated Accessibility stores.
- b. Repeatedly update retail staff on accessibility service provisions and accessible communication in-store

#### **5. Having system-wide Accessibility Plan options listed on the Point of Sales (POS) systems, both website and in-store terminals, including in-store and e-commerce sites.**

- a. Applicable to the authorized retail reseller locations.
- b. Accessibility plan information needs to be listed in the systems.

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<sup>2</sup> Table 3 Overview of retail mobile sector, Communications Marketing Reports 2020, CRTC data collected: <https://crtc.gc.ca/eng/publications/reports/PolicyMonitoring/2021/tel.htm>

<sup>3</sup> Mission Consulting VRS Feasibility Study, 2012 (Phase 9: Forecasts of VRS Users) [link](#)

<sup>4</sup> Unlocking the Mystery Shopping Experiences of Deaf, Deaf-Blind and Hard of Hearing Canadians in Wireless Service Retail Stores - [link](#)

<sup>5</sup> A Stark Reality: Wireless Accessibility Issues and Challenges for Deaf, Deaf-Blind, and Hard of Hearing Canadians - [link](#)

<sup>6</sup> DWCC et al. TNC 2020-178 Intervention - [link](#)

<sup>7</sup> DWCC et al. October 12 TNC 178 Reply - [link](#) (downloads from CRTC website)

<sup>8</sup> DWCC et al. TNC 2020-178 Recommendations One-Stop Handout Summary document - [link](#)

## Wireless Service Corporations

**4. Corporate and Storefront locations need consistent training and awareness about Accessibility Plans.** The storefront salesperson should provide consistent information.

- a. In-store terminals and website Point of Sales (POS) systems must include accessibility plan options.

## Customer Awareness

### Wireless Service Providers

**6. Create ASL and LSQ videos explaining details about company-specific Accessibility Plans.**

### Canadian Wireless Telecommunications Association (CWTA)

**7. Create ASL and LSQ videos explaining**

**1) Information about Accessibility Plans;**

**2) Unlimited Built-in access to Canada's VRS.**

- a. These videos explain the availability and existence of accessibility plans and the built-in access to VRS, and to contact the companies for more information.

### Canadian Administrator of Video Relay Services (CAVRS)

**8. Create ASL and LSQ videos explaining about 1) Data Unlimited Built-in access to Canada's VRS 2) Data consumption rates for up to 2 hours of video communication (information on its website)**

Referencing SRVCanadaVRS website:

- a. "...about 1,079 Megabytes or 1.05 Gigabytes per month for every two hours (120 minutes) that you use the service."<sup>9</sup>
- b. "for the highest quality VRS calls, we recommend a minimum of 1.3 Megabits per second (Mbps) bandwidth for both upload and download speeds to your device."<sup>10</sup>

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<sup>9</sup> SRV Canada VRS Internet webpage on their website: [SRV Canada VRS](#)

<sup>10</sup> Quoted from SRV Canada VRS FAQs on their website: [SRV Canada VRS](#)

### **DWCC et al. and other DDBHH organizations**

**9. Produce ASL and LSQ vlogs to be shared across Canada with information about proof of membership to organizations to qualify for WSP accessibility plans.**

**10. Share Wireless Service Providers, CAV, CWTA's ASL and LSQ videos with DDBHH communities through social media and email distribution.**

### **Promotions and Awareness**

16. DWCC et al.'s recommendations cover the in-store promotions and companies' advertising to the broader public. The staff in the stores have to do their part and be more aware through regular training. The designated accessibility stores will solve the issue of streamlining the accessibility services and products to specific locations.
17. DWCC et al. also propose a collective responsibility of consumer groups working together to increase the promotions of such accessibility services and features provided by the wireless service providers.
18. With these recommendations, the accessibility plan numbers can be increased and analyzed more accurately, representing the enhanced accessibility offerings of wireless service providers. In this way, the wireless companies will be seen as providing a valuable social benefit to their customers. The companies will be viewed in a positive light. The companies could instead compete to be the "most accessible company!"

### **Confidentiality vs. Transparency**

19. After seeing the disclosure and the resulting low total aggregated number, DWCC et al. fail to see the rationale for the companies invoking boilerplate responses quoting from different rules, laws, and policies, including Section 32 (CRTC Rules) and Section 39 of the Telecommunications Act.
20. It is a minimal statistical number that we are looking at here, so it is absurd that it has to be considered "confidential." The mere act of not disclosing this information can be regarded as an act of "marginalization" with information that would benefit accessibility groups. This limited disclosure of data applies to the information requested for TTY and IP Relay consumer data.
21. DWCC et al. must question the "confidentiality" of the statistical data we are requesting for the mere fact that it does not "steal" any market shares, and it is not considered competition because the reality is that the disability discounts as accessibility plans are in fact, *income loss* items and not income benefits. The companies are looking at losses of \$10.00 or \$20.00 x number of users rather than competition numbers. In other words, the providers lose money by providing these social benefits, so why would the companies want to steal these customers from their competitors? To lose even more money? The whole concept is incomprehensible and defies logic. DWCC et al. cannot fathom this line of reasoning.

22. As a result, the DWCC et al. insist on transparency with accessibility-related statistical data. Accessibility groups have the fundamental right to access critical related statistical data. It is unfair and discriminatory to hold this information hostage from our consumer groups.
23. As previously stated, Deaf, Deaf-Blind, and hard of hearing consumer groups work WITH the service providers collaboratively to improve the industry and support the goals of the Accessible Canada Act.

## Conclusion

24. In closing, DWCC et al. remind the CRTC and all TNC 2020-178 parties that "*Communication Equity means providing ample and essential unlimited data for the Canadian sign language user's video communication over the wireless networks.*"
25. 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.
26. DWCC et al. appreciate the Commission's consideration of its Response to its Disclosure of Information. Should you have any questions, please do not hesitate to contact all of us.

Regards,

Lisa Anderson, Chair  
Deaf Wireless Canada  
Consultative Committee  
[regulatory@deafwireless.ca](mailto:regulatory@deafwireless.ca)

Jim Roots, Executive Director  
Canadian Association of the Deaf-  
Association des Sourds du Canada  
[jroots@cad.ca](mailto:jroots@cad.ca)

Megan McHugh, President  
Canadian National Society of the Deaf-Blind  
[mchugh.mm@gmail.com](mailto:mchugh.mm@gmail.com)

cc: Nanao Kachi, CRTC  
Guillaume LeClerc, CRTC  
Wissam Constantin, President, CAD-ASC  
Megan McHugh, President, CNSDB  
All Parties to TNC 2020-178

**Hereby submitted by: RFI Response Documents Team  
(February 25, 2022)**

**Writer:** Lisa Anderson, Chair, DWCC  
**Advisor:** Jim Roots, Executive Director, CAD-ASC  
**Reviewers:** Wissam Constantin, President, CAD-ASC  
Jeffrey Beatty, DWCC Technical Consultant  
**Editor:** Leonor Vlug, Consultant

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