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

May 16, 2022

Dear Secretary-General,

Public record: 1011-NOC2021-0102: CRTC TNC 2021-102 Call for comments – Review of video relay service - Addendum to an Intervention

1. Deaf Wireless Canada Consultative Committee-Comité pour les Services Sans fil des Sourds du Canada (**DWCC-CSSSC or DWCC**) hereby files an addendum to its intervention originally filed on May 11, 2022.
2. DWCC submitted its intervention a few days ago; however, it realized it needed more time to add more details to the Funding section of the proceeding participant questions set out by the CRTC for TNC 2021-102. DWCC expands its answer for Q9 - Q11 in this document as follows:

Funding

Q9. Funding for VRS comes from the National Contribution Fund (NCF). Are the current funding model and the \$30 million annual funding cap still appropriate?

Q10. Retail Internet service revenues are not currently considered contribution-eligible revenues for funding VRS. Should those revenues be included? Provide a detailed rationale.

Additional comments::

3. CRTC established the NCF in Telecommunications Regulatory Policy 2000-745, where the determination was based on the high cost of local services in rural and remote areas. The focus was primarily about the high costs of local services in rural and remote areas and that being the responsibility of the telecommunications companies. This means that the NCF's priority area of use is

not on accessibility but rather on remote and rural areas. This means the NCF being used for Accessibility defeats the purpose of the NCF's origins twenty-two years ago.

4. DWCC questions whether the NCF is the best way to manage the funds for provisions of video relay services because of the caps and limits it is putting on provisions of telecommunications accessibility.
5. The reason for DWCC's question is the term "regulatory capture" a word defined by the CFA Institute with "the concept of Regulatory Capture (Reg Capture) typically refers to a phenomenon that occurs when a regulatory agency that is created to act in the public interest, instead advances the commercial or political concerns of special interest groups that dominate an industry or sector the agency is charged with regulating."¹
6. DWCC proposes to do it differently, put the onus on all telecommunication service customers' bills and pool the customers' contributions into something like a "universal fund" that would create an even sustainable source of funds for a wide range of purposes with accessibility being one of them.
7. Additionally, this "universal fund" removes the influence that telecommunication service companies have funding sources and puts the power back in the consumers' hands.
8. The national contribution fund would collect funds from people's mobile wireless, internet and cable bills and create a new revenue source, then these monies would be considered a contribution-eligible fund for VRS. It lessens the industry's influence and ensures there is an accessibility lens in the National Contribution Fund. DWCC wants to stop the regulatory capture of the CRTC.
9. DWCC sees the telecommunication service providers somewhat as a barrier, not agreeing on matters that are an accessibility right, putting a detrimental value on accessibility. Therefore DWCC has developed a feeling of aversion to the National Contribution Fund (NCF) because the industry has not been prioritizing accessibility.
10. We also propose that consumers who pay universal monthly fees to Mobile Wireless, Telcos, Internet, and Cable Providers. These revenues could be considered contribution-eligible revenues for funding VRS. In this way all Canadians would contribute to this to ensure accessibility as one of the priorities with the National Contribution Fund (NCF) without having to depend on the

¹ CFA Institute - [Regulatory Capture](#)

telecommunication service providers. We must cease regulatory capture by the CRTC.

Q11. The CAV must meet minimum requirements, including submitting an annual application to the Commission, in order for the NCF to release funds. Are these minimum requirements still appropriate? If not, what changes or additions are required and why?

Additional comments:

Multiple Platforms for Accessibility

11. In reference to the minimum requirements set out in TNC 2014-187, Appendix B paragraphs 16 - 18, DWCC adds on the following comments:

12. DWCC supports a monitored and administered platform, a single (common) VRS technology platform but with a tethered interoperability for choice and accessibility; however **it must be possible to have a few different VRS companies tethered to the main platform**, with a few different designed video communication platforms so that the customer has a choice of which app fits their needs. **This would require a simple interoperability of a variety of a few video communication platforms, including one for the Deaf-Blind, such as provided by [GlobalVRS](https://globalvrs.com), with [nWise](https://nwise.se) having the ability to interface with others²**

13. nWise³ provides the software needed to make a VRS call possible for a DeafBlind or Deaf-Low Vision person. With nWise's technology and GlobalVRS' quality of service, the outcome is a complete and satisfactory experience for the user. “

9-1-1 Accessibility

14. In reference to the TNC 2014-187 in Appendix B, Item numbers 24 to 26, There are several issues DWCC has in relation to 9-1-1 and the VRS application.

15. On the desktop applications, there is a red button for 9-1-1 that is easy to reach and click to dial 9-1-1, and this is not in a prominent place in mobile devices, so it is not fast to dial 9-1-1 on mobile. This 9-1-1 button technical configuration must be updated and fixed to make it possible for everyone's safety.

² GlobalVRS - <https://globalvrs.com/db/#yellow>

³ nWise DeafBlind Telecommunication Apps - <https://nwise.se/solutions/deafblind-telecommunication-apps/>

16. Secondly, it should not be the onus on the VRS user to keep their addresses updated, because if an emergency happens on the first day of the person moving to a new location, they should not have to spend 3 minutes explaining their address to the operator/dispatcher, as every minute counts.
17. DWCC would like to get confirmation from the CRTC and the CAV that there is a distinction between the 9-1-1 button on the desktop versus the mobile versions of the application. DWCC also has learned of situations where the user called from their mobile, but the emergency staff dispatched people to their residential address on file. Therefore there needs to be a priority GPS signaling from the mobile device.
18. The desktop version would not need to have a GPS routing assigned to it as there is a reliance on the database entry within the application user profile settings.
19. In reference to the wireless configuration, it is DWCC's understanding that currently "wireless 9-1-1 calls [are] routed based on the location of cell towers, which can cover up to a 10-mile radius. This can cause delays in emergency response, especially when a call is made within PSAP border areas where [province, municipality] or city boundaries overlap."⁴ As noted across the border, fairly recently, as of May 10, 2022, AT&T announced it is possible to save the hassle with the emergency calls by initiating location-based routing 9-1-1 calls. This allows the wireless carrier to transit wireless emergency calls to the correct call center based on a device's GPS location. A quote from its press release⁵ is as follows:
 - a. "AT&T* is the first carrier to launch location-based routing to automatically transmit wireless 9-1-1 calls to the appropriate 9-1-1 call centers on a nationwide basis. Through this new "Locate Before Route" feature from Intrado, AT&T can quickly and more accurately identify where a wireless 9-1-1 call is coming from using device GPS and hybrid information to route the call to the correct 9-1-1 call center also known as public safety answering point or PSAP. With location-based routing, a device can be located and routed within 50 meters of the device location."

⁴ AT&T Press Release - [AT&T Launches First-Ever Nationwide Location-Based Routing](#)

⁵ The Verge - [AT&T will now use a device's GPS location to route 911 calls - The Verge](#)

19. Canada needs to follow suit with this kind of setup and not rely on the old system but update the app with Global Positioning Systems (GPS).

Equipment

20. In reference to the TNC 2014-187 in Appendix B, item number 28, whereas it says the VRS “should be provided at no additional cost to the customer,” it is DWCC’s view that the CAV failed on this point by telling the customers to **buy** the embrava Blynclight to work with their system for flash notifications.

21. CAV should have supported all the customers by distributing one free Blynclight to each customer. The rationale is Deaf, Deaf-Blind and Hard of hearing have a large percentage of unemployed and underemployed members of Canadian society who are on social assistance and cannot afford equipment when on fixed incomes.

Billing Customers

22. About minimum requirements item number 29 in TRP 2014-187, In the proceeding, the one on the topic of wireless accessibility, TNC 2020-178, DWCC outlined how automated forwards from hearing people calling phone/text numbers to video mail of the *SRV Canada VRS* should not be surcharged because it is a necessity when it comes to **accessibility**.

Closing

23. In closing, DWCC appreciates the Commission’s consideration of its two Intervention documents, including this one, now submitted to the record of CRTC’s first Review of Video Relay Services in Canada, TNC 2021-102. Should you have any questions, please do not hesitate to contact us.

Regards,

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