

Deaf Wireless Canada Consultative Committee

INTERVENTION

Review of Video Relay Services



CRTC TNC 2021 - 102

May 11, 2022



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Land Acknowledgement:

“From coast to coast to coast, we acknowledge the ancestral and unceded territory of all the Inuit, Métis, and First Nations people that call this land home.”

“The pandemic has impacted the video communications industry negatively and positively. It has shown the incredible potential for improving existing video platforms for full accessibility to all Deaf, Deaf-Blind and Hard of Hearing (DDBHH) Canadians.

Now is the time and the opportunity for SRV Canada VRS to update its technical platform by allowing it to integrate with Zoom and other technical configuration connections and thereby increase accessibility for all VRS callers.

It is 2022, and the Accessible Canada Act is here. It is time to include the Deaf-Blind for equity with sighted Deaf and Hard of Hearing Canadians with accessibility to Canada’s VRS service.

On and off reserve, Indigenous people were left out of many conversations, living in remote regions. It is time CAV begins its outreach efforts to get them accessibility, in the spirit of Truth and Reconciliation.”

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Executive Summary

In this first review of video relay services for CRTC Telecom Notice of Consultation 2021-102, DWCC highlights Indigenous and Deaf-Blind accessibility to Canada's VRS. DWCC appreciated being involved in this proceeding and given a chance to provide its experience with the SRV Canada VRS since 2016.

DWCC takes a different approach with its participation in this proceeding, sending all the questions to its members and contributing their answers and perspectives.

DWCC is a committee made up of members from coast to coast, striving for a balance of members across varied regions and genders, including a French and LSQ member, two Deaf-Blind consultants and analysts, members that are LGBTIQ+, and is taking steps to diversify its team, first with the addition of an Indigenous Deaf consultant. More changes are to come. This document will provide all these ranges of perspectives and experiences.

Overall, DWCC is pleased with the *SRV Canada VRS* and the administration. As mentioned in this document, the pandemic has made evident the challenges and barriers to specific subgroups in our DDBHH Canadian community. Also, the document will note systematic gaps that need to be addressed and offer ideas and perspectives to improve these gaps.

Indigenous people need to be included on the Board of Directors. The Accessible Canada Act (ACA) recognizes ISL as the language of Deaf people in Canada; thus, CAV should have an Indigenous Director. Cultural sensitivity must be a core value for CAV and SRV Canada VRS. CAV needs to take steps as part of "Call to Action #92"¹ regarding the federal government's declaration of steps to Truth and Reconciliation.

The ACA and the 2019 Policy Direction to the CRTC are now in effect, and it is time to include and bring Deaf-Blind to equity of the sighted Deaf and hard of hearing VRS users. Technical upgrades and enhancements are recommended for the current platform. Customer Service needs to be streamlined and separated between technical customer support and interpreter feedback. Increased accessibility means increased resources to accommodate those with specific needs and need more support, for one-to-one in-person technical assistance and Indigenous, seniors, and Deaf-Blind persons. Also, CRTC should ensure that CAV is made available and create job opportunities for Communication Facilitators to assist Deaf-Blind users of SRV Canada VRS.

Deaf-Blind individuals and those with additional disabilities need equipment for communication and information, and the federal government must figure out how to administer an equipment support program to adhere to the Accessible Canada Act.

Further staffing resources need to be created to shift and focus attention on the hearing callers' awareness and understanding of VRS in Canada, including businesses, government and banks. Accessibility to American VRS numbers needs to be made possible; thus, interoperability needs to be developed. DWCC would like to see CAV as a Canadian-led service with an increased budget and cap to expand more working parts to the CAV Ecosystem.

¹ Truth and Reconciliation Commission of Canada (TRC) - [Business and reconciliation](#)



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

May 11, 2022

Dear Secretary-General,

CRTC TNC 2021-102 Call for comments – Review of video relay service - Intervention

Intention

1. The Deaf Wireless Canada Consultative Committee - Comité pour les Services Sans fil des Sourds du Canada (DWCC - CSSSC or "DWCC") hereby submits its intervention and declares its wish and interest in participating in the virtual discussions after the Reply phase.

Introduction

2. DWCC-CSSSC advocates for the full inclusion of diverse members within the Canadian Deaf, Deaf-Blind and Hard of Hearing (DDBHH) community in Canadian society. The spectrum of DDBHH life experiences, including those that are Indigenous and 2SLGBTQIA+, range from those with cognitive delay, immigrants learning English or French as a second language, those with various degrees of hearing loss, those with the unique "double" disability as Deaf-Blind, and finally native ASL/LSQ users. Additionally, DWCC supports that Indigenous have the right to ask for support, including requesting Indigenous Sign Language Interpreters.
3. Eight members of the DWCC participated in this intervention, all bringing in their six years of experience with SRV Canada VRS since its launch.

Mandate

4. DWCC's mandate is to advocate for accessible wireless communications equity for DDBHH Canadians, including but not limited to:
 - a. Cost-reasonable accessible wireless data plans for ASL and LSQ users for two-way video calls.
 - b. Accessible industry-wide promotions of wireless services and products.

- c. Removal of disparities in costs of the same accessible wireless products and services within each company.
- d. Provision of functional equivalent wireless products and services, including wireless applications (apps).
- e. Accessible wireless emergency services (including emergency alerts and direct text to 911).
- f. Nationwide public awareness, education and outreach on currently accessible wireless and mobile communication products and services.

Comments about VRS Policy TNC 2014-187

- 5. While a few members of the DWCC were part of separate and other committee groups (BC Video Relay Services and Ontario Video Relay Services Committee) that long advocated from 2008/2009 to 2014, in either advocacy and consultative roles for the Canada VRS, not all were able to participate in this proceeding fully, as there would be a perceived conflict of interest.
- 6. However, as a whole, the Committee would like to express its gratitude to the CRTC for establishing the policy TNC 2014-187 and subsequently TNC 2014-659, both of which ignited the lengthy implementation process to establish the video relay service solution for Canadians. This service changed everyone's lives and increased the independence of thousands of Deaf, Deaf-Blind and Hard of Hearing Canadians. CRTC, thank you.

COVID-19 Pandemic Impact

- 7. The prioritization of technology platforms has evolved from voice and audio priority to video quality priority. For example, voice calls over the LTE networks. Thanks to the COVID-19 pandemic, things changed for the better, and video quality communications have become a priority.
- 8. Pre-pandemic hearing people in the general population would demand the highest quality of communication to be focused on audio and voice technology for communications over the internet.
- 9. Deaf people were left behind because voice quality was not their priority, but the video quality was. For example, video communication users of sign language were constantly encouraged to use the Skype platform for meetings or virtual meetings. However, people didn't realize that Skype tends to prioritize voice technology, so the voice/audio came across in Skype meetings crystal clear. Video quality was secondary, so it was often unstabilized and pixelated and not high quality for video communications. Concurrently, Apple technology treated voice/audio and video equally regarding technical updates and configurations.
- 10. DWCC as a group kept going to CRTC to bring light to this fact and why it was essential to switch or pay equal attention to video calling. In Telecommunication Regulatory Policy 2016-496, the issues came to light, and for this VRS proceeding, the direct result of that policy needs to be impressed in people's memory while analyzing for the review of video relay services.

11. In Telecommunication Regulatory Policy 2016-496², it was explained:

"131. The universal service objective reflects the current telecommunications services that enable the participation of Canadians in the digital economy and society. The Commission determines that the following services – which form part of the universal service objective – are basic telecommunications services within the meaning of subsection 46.5(1) of the Act: (i) fixed and mobile video wireless broadband Internet access services, and (ii) fixed and mobile wireless voice and video services."
12. Thanks to Zoom, video quality has been prioritized once again so that all now can benefit, and Deaf people are now on an equal footing with hearing people when it comes to video conferencing and communications. Quality of video is a priority for video relay services, and this means an examination of the technology platform that provides the current *SRV Canada VRS*, which will be discussed through this intervention.
13. DWCC now turns to applicable conventions and laws relevant to reviewing video relay services in Canada.

Conventions and Laws

14. DWCC quotes relevant sections of applicable legislation, a policy direction, and international treaties to indicate that DDBHH individuals have the right to telecommunications at the same communication equity as their hearing counterparts.

United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP)

15. White settlers have been living, playing, and working on the lands of the people here before they came, the Indigenous People, whether they be First Nations, Indigenous, Metis or Inuit. In the last five years, Canada has taken steps to recognize the wrongs of the past of the settlers with the original Indigenous habitants.
16. At the United Nations level, they recognized the rights of Indigenous People as far back as 2008. The UN Declaration *on the Rights of Indigenous Peoples* (UNDRIP)³ is based on equality and non-discrimination. It also outlines Indigenous self-determination, self-government, and the right to prosperity because Indigenous rights include economic rights.
17. It took our country 13 years, but Canada committed itself to reconciliation. In June 2021, the federal government passed Bill C-15⁴. The legislation affirms the *United Nations Declaration on the Rights of Indigenous Peoples* (UNDRIP).

² Telecom Regulatory Policy TRP 2016-495: <https://crtc.gc.ca/eng/archive/2016/2016-496.htm>

³ The United Nations Declaration UNDRIP - https://www.un.org/esa/socdev/unpfii/documents/DRIPS_en.pdf

⁴ Bill C-15 - <http://parl.ca/DocumentViewer/en/43-2/>

18. As we examine the right to information and communication, we also need to examine and pay particular attention to the parts in specific articles of the UNDRIP, particularly Articles 21 and 21, with the parts in bold text:

Article 21 1. Indigenous peoples have the right, without discrimination, to the improvement of their economic and social conditions, including, inter alia, in the areas of education, employment, vocational training and retraining, housing, sanitation, health and social security.

Article 21. 2. States shall take effective measures and, where appropriate, special measures to ensure continuing improvement of their economic and social conditions. **Particular attention shall be paid to the rights and special needs of indigenous elders, women, youth, children and persons with disabilities.**

Article 22 1. Particular attention shall be paid to the rights and special needs of indigenous elders, women, youth, children and persons with disabilities in the implementation of this Declaration.

19. The law now requires all federal government relations with Indigenous peoples to achieve reconciliation. That means protecting and promoting Indigenous peoples' inherent rights to pursue their economic, social, and cultural development freely.
20. The legislation clarifies that fulfilling these rights is the foundation of stronger relationships between non-Indigenous Canadians and First Nation, Inuit and Métis peoples.
21. In Canada, there is an Act respecting the UNDRIP. CRTC and the CAV also need to recognize and familiarize themselves with the Indigenous Language Act. Portions of this Act are critical for reference to keep in mind when in the process of decision-making for the regulatory process as follows:

Indigenous Languages Act (ILA or Bill C-91)

Preamble

Whereas the recognition and implementation of rights related to Indigenous languages are at the core of reconciliation with Indigenous peoples and are fundamental to shaping the country, particularly in light of the Truth and Reconciliation Commission of Canada's Calls to Action;

Whereas the Government of Canada is committed to implementing the United Nations Declaration on the Rights of Indigenous Peoples, which affirms rights related to Indigenous languages;

Whereas First Nations, the Inuit and the Métis Nation have their own collective identities, cultures and ways of life and have, throughout history and to this day, continued to live in, use and occupy the lands that are now in Canada;

Whereas Indigenous languages played a significant part in the establishment of relations between Europeans and Indigenous peoples;

Whereas a history of discriminatory government policies and practices, in respect of, among other things, assimilation, forced relocation, the Sixties Scoop and residential schools, were detrimental to Indigenous languages and contributed significantly to the erosion of those languages;

Whereas the status of Indigenous languages varies from one language to another, including with respect to the vitality of those languages, and there is an urgent need to support the efforts of Indigenous peoples to reclaim, revitalize, maintain and strengthen them;

Whereas a variety of entities in different regions across Canada have mandates to promote the use of Indigenous languages and to support the efforts of Indigenous peoples to reclaim, revitalize, maintain and strengthen them and there is a need for the Government of Canada to provide continuing support for those entities;

Whereas the Government of Canada is committed to providing adequate, sustainable and long-term funding for the reclamation, revitalization, maintenance and strengthening of Indigenous languages;

Whereas Indigenous peoples are best placed to take the leading role in reclaiming, revitalizing, maintaining and strengthening Indigenous languages;

Whereas Indigenous-language media and lifelong learning of Indigenous languages, including education systems for Indigenous people, are essential to restoring and maintaining fluency in those languages;

*And whereas there is a need to take into account the unique circumstances and needs of Indigenous elders, youth, children, **persons with disabilities**, women, men and gender-diverse persons and two-spirit persons;⁵*

⁵ Indigenous Language Act - <https://www.parl.ca/DocumentViewer/en/42-1/bill/C-91/royal-assent>

Application of ILA (C-91) Preamble to Indigenous Deaf

22. The preamble wording includes Indigenous Deaf and Hard of hearing who attended Deaf residential schools and went through the foster system, living in group homes. These Deaf were forced to be removed from their homes to relocate to attend Deaf Residential schools and consequently were deprived of their Indigenous culture, language and identity.
23. On this note, it must be highlighted that it is for this very reason that many Indigenous are language deprived and, in some cases, illiterate.
24. Further to the Indigenous Language Act, the following section is specific to Indigenous Sign Languages:

Purposes of Act

Purposes

5 The purposes of this Act are to

(a) support and promote the use of Indigenous languages, **including Indigenous sign languages;**

25. In March 2019, in the steps leading up to the Indigenous Language act, a group of Indigenous Deaf sent a letter to the Senate Committee with this document, identifying possible Indigenous Sign languages as follows:
 - a. Coast Salish Sign Language (CSL);
 - b. Inuit Sign Language (IUR) *Recognized in 2008*;
 - c. Oneida Sign Language (OSL);
 - d. Secwepemc Sign Language
 - e. Plains Indian Sign Language (PiSL):
 - Blackfoot
 - Cree
 - Dakota
 - Ojibwe⁶
26. The document supplies this caveat regarding the above list:" This is not a comprehensive list of the Indigenous Sign Languages in Canada; this list is only a tiny sample of the Indigenous Sign Languages that our Council is working toward inclusion in the Indigenous Language Act. Our Council would like to see all Indigenous hand-talking and visual-gestural languages, including Sign languages, be included in the Act, which includes sign languages. Whereas there is a spoken language, there is likely a visual, gestural language within the Indigenous cultures." ⁷

⁶BC Hummingbird - Letter to Senate Committee: [1 Indigenous Sign Language Council BC Hummingbird Society for the Deaf \(BCHSD\)](#)

⁷ BC Hummingbird - Letter to Senate Committee: [1 Indigenous Sign Language Council BC Hummingbird Society for the Deaf \(BCHSD\)](#)

27. UNDRIP gives particular attention to Indigenous Deaf peoples in the implementation of this Declaration as described in Articles 21 and 22 but also outlines rights for Indigenous Languages in the following:
- Article 13
 - Article 14
 - Article 16
28. Our Indigenous Deaf peoples believe we need to remind Canada, CRTC, and the CAV that Indigenous languages are an Indigenous right and an inherent right — to speak and pass on our languages — recognized internationally by the UNDRIP and that Canada has officially adopted. The Federal Government's obligation to support such education and to do so in a manner that ensures that the quality of the education offered in the Indigenous ancestral sign languages must be equal to that offered in English and French.⁸
29. Now that we have clarified and established the rights to accessibility and language for Indigenous Deaf or hard of hearing in Canada, we shift to the persons with disabilities applications, starting with the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD).

United Nations Convention on the Rights of Persons with Disabilities (UNCRPD)

30. On the international level, Canada ratified the United Nations Convention on the Rights of Persons with Disabilities (CRPD) in 2010, where the Convention ensures the right to access to information and communications in Article 9.
31. State parties, such as Canada, should take appropriate measures to ensure that persons with disabilities and DDBHH people have access on an equal basis with others with information and communications technologies.
32. Canada ratified the Convention on the Rights of Persons with Disabilities (CRPD) on March 11, 2010. This document includes information and communication provisions as part of true accessibility for DDBHH Canadians as a human right, when received equally like other Canadians, especially during the sales experience. It is critical when it comes to purchasing provisions for their accessibility needs.
33. One example of this true accessibility is to provide sign language interpretation services to ensure that communication is provided to DDBHH Canadians.

⁸ BC Hummingbird - Letter to Senate Committee: [1 Indigenous Sign Language Council BC Hummingbird Society for the Deaf \(BCHSD\)](#)

34. Article 2 "Definitions" includes the following wording: *For the purposes of the present Convention: "Language" includes spoken and signed languages and other forms of non-spoken languages*⁹
35. In addition, the Convention ensures the right to Sign language recognition in Article 21. Specifically in 21 (b) and 21 (e) as below:
- a. **21 b) Accepting and facilitating the use of sign languages**, Braille, augmentative and alternative communication, and all other accessible means, modes and formats of communication of their choice by persons with disabilities in official interactions;
 - b. **21 e) Recognizing and promoting the use of sign languages.**¹⁰
36. For relevancy, it is specifically Article 9, 1b. that applies to telecommunications accessibility.
37. Article 9, "Accessibility," reads in part as:
1. To enable persons with disabilities to live independently and participate fully in all aspects of life, States Parties shall take appropriate measures to ensure to persons with disabilities access, on an equal basis with others, to the physical environment, to transportation, to information and communications, including information and communications technologies and systems, and to other facilities and services open or provided to the public, both in urban and in rural areas. These measures, which shall include the identification and elimination of obstacles and barriers to accessibility, shall apply to, inter alia:
 - b. information, communications and other services, including electronic services and emergency services.**
 2. States Parties shall also take appropriate measures:
 - e) To provide forms of live assistance and intermediaries, including guides, readers and professional sign language interpreters**, to facilitate accessibility to buildings and other facilities open to the public;
 - g) To promote access for persons with disabilities to new information and communications technologies and systems, including the internet;**
 - h) To promote the design, development, production and distribution of accessible information and communications technologies and systems at an early stage, so that these technologies and systems become accessible at minimum cost.**¹¹

⁹ UNCRPD Article 2 - Definitions - [Article 2 – Definitions | United Nations Enable](#)

¹⁰ UNCRPD Article 21 - Freedom of Opinion and Access to Information - [Article 21 – Freedom of expression and opinion, and access to information | United Nations Enable](#)

¹¹ UNCRPD Article 9 - Accessibility - [Article 9 – Accessibility | United Nations Enable](#)

38. In 2018, Canada acceded to the Optional Protocol to the United Nations Convention on the Rights of Persons with Disabilities.¹² and accession to the Optional Protocol means that Canadians will have additional recourse to make a complaint to the UN Committee on the Rights of Persons with Disabilities if they believe their rights under the Convention have been violated.
39. The Accessible Canada Act was introduced in the House of Commons and the Senate in the same year and eventually passed in June 2019. Now, Canada must ensure that it is a barrier-free Canada, at least from the federal government level, and this includes CRTC, CAV, and all the telecommunication companies that provide services to Deaf, Deaf-Blind and Hard of hearing Canadians.

Accessible Canada Act

Section 5 (c) of the Accessible Canada Act prohibits barriers in mobile services as shown in:

Purpose

5. The purpose of this Act is to benefit all persons, especially persons with disabilities, through the realisation, within the purview of matters coming within the legislative authority of Parliament, of a Canada without barriers, on or before January 1, 2040, particularly by the identification and removal of barriers, and the prevention of new barriers, in the following areas:

(c) information and communication technologies;

40. Section 5.2 of the same Act reads as follows:

Recognition of sign languages

(2) American Sign Language, Quebec Sign Language and Indigenous sign languages are recognized as the primary languages for communication by deaf persons in Canada.

41. This key fact means that sign languages play a big part in ensuring accessibility for deaf persons in Canada. CRTC has done an exemplary job in ensuring some of its policies, such as the Wireless Code and the Internet Code, whereas video translations in ASL and LSQ are mandated. And even after years of the DWCC repeatedly requesting it, ASL and LSQ videos are now being released for proceedings by the CRTC. Thank you.
42. DWCC took the next step, and with the Order in Council delivered, a new Direction to the CRTC was drafted and submitted; DWCC submitted to the public process with the position that there was not a word of "accessibility" in the proposed draft. We are pleased to see the critical wording now published in the 2019 Ministry of Innovation Science and Economic Development (ISED) Order Issuing a Direction to the CRTC.

¹² Canada accedes to the Optional Protocol to the United Nations Convention on the Rights of Persons with Disabilities - [Canada accedes to the Optional Protocol to the United Nations Convention on the Rights of Persons with Disabilities](#)

43. Subsequently, the Order Issuing a Direction to the CRTC now includes wording instructing the CRTC to ensure **accessibility**.

2019 ISED Order Issuing a Direction to the CRTC

44. The Ministry of Industry Science and Economic Development (ISED) took an extra step to ensure that accessibility is enforced in its updated Policy Directive in 2019 (**SOR/2019-227**)

Principles

a. In exercising its powers and performing its duties under the Telecommunications Act, the Commission must implement the Canadian telecommunications policy objectives set out in section 7 of that Act, in accordance with the following:

b. the Commission should consider how its decisions can promote competition, affordability, consumer interests and innovation, in particular, the extent to which they

c. enhance and protect the rights of consumers in their relationships with telecommunications service providers, **including rights related to accessibility**,

d. enable innovation in telecommunications services, **including new technologies and differentiated service offerings**,"

b. **the Commission**, in its decisions, **should demonstrate its compliance with this Order** and should specify how those decisions can, as applicable, promote competition, affordability, **consumer interests and innovation**.¹³

45. And these are the constitutions and the legal applications we might refer to throughout the intervention where DWCC answers the intervention questions as laid out in this proceeding.

Methodology

46. The format for the responses for each of these questions in this document was one where the questions were sent to each of the eight Committee members to answer to the best of their ability from their experience and perspective. Each Committee Member (CM) has been assigned a number, and it is their quote that they provide. For example, one member will be labelled and identified as "CM#1."

47. To create a flow between the questions, one Committee consultant member pulled all the answers together and tied up the response for each question, summarizing the answers together for each question in the same numbered Answer (A#)

¹³ Order Issuing a Direction to the CRTC - [Order Issuing a Direction to the CRTC on Implementing the Canadian Telecommunications Policy Objectives to Promote Competition, Affordability, Consumer Interests and Innovation \(SOR /2019-227\)](#)

VRS User Experience

QUESTION 1

Q1. Describe the impact that the introduction of VRS has had on people who communicate using sign language. Has the service improved access to telecommunications services since it was launched?

A1:

48. Yes, the service has had a significant impact on members of the Committee and has improved access considerably since the video relay services were launched. Here are committee members' testimonials when responding to this question.
49. **CM#2:** "After living in the States from 2014 - 2016, it was my first time using VRS ever in my life. I was able to call family members in Canada, and they were surprised that I could use interpreters on phone calls. It was a life-changing moment for me. I was able to call everywhere with freedom. You have no idea what that feels like compared to using TTY, where nobody wants to call me or have the patience to wait for me to type on the machine then an operator relays my message. Way too slow, especially for emergencies!"
- After school, I moved back to Canada, and it felt like the rug was pulled under my feet when I had to revert to using a TTY. I didn't have the freedom to call hearing people, and it was a challenge to find a job, calling my doctor or bank. When CAV and the video relay service were set up in 2016, I was thrilled beyond imagination. The freedom of communication is taken for granted until it's taken away from you."
50. **CM#6:** "Yes, it has a life-changing impact. We can express our thoughts through an interpreter and immediate/interactive dialogue instead of texting back and forth."
51. **CM#5:** "The VRS service positively impacted people using sign language everywhere. The calls are notably shorter than on TDD's, clearer communication with fewer misunderstandings between the hearing callers and sign language participants, less frustration between the callers and respondents and much more. So the answer is a definite yes that the service had improved access to telecommunications services since it was launched."
52. **CM#7:** "My life has changed; I am fully independent. I can call my hearing parents even in the late hours (they are night owls) and ask them a random question. Another time, I was in an ambulance, and the VRS Interpreter stayed with me while the paramedics checked me out; while the police interrogated me with some details related to a car accident. We hung up before I was taken to the emergency room. They saw me as a human. Human connection in an everyday crisis, and I truly appreciated it. Life changing is too simplistic a word to describe and to answer this question."
53. **CM#4:** "The impact has been mixed from people since the introduction of VRS. Most of their reactions initially had been positive because the VRS helped facilitate better communication between the Deaf people and their hearing counterparts through the sign language interpreters."

"However, here are the negative impacts below:

- 1) The web-based app with the flash plugins had created many problems for the Deaf clients because they sometimes were stopped by the security issues. Plus, almost all the major web browsers stopped supporting the flash-based plugins shortly after the launch of the Video Relay Services. It started creating problems for some clients who had limited or no computer literacy.
- 2) The corporations, such as banks, insist that Deaf clients use Text-based relay services (such as TTY or IP Relay) over the video relay services when they reach their customer services for needed assistance.
- 3) The technical support at Ives initially was problematic because some of the technical support persons lacked the skills to resolve the VRS-related issues.

Later, those issues were slowly resolved, such as a change from the web-based app to a desktop app, improved technical support services and better communications with the customers. Overall, the VRS has been improved over the last few years."

QUESTION 2

Q2. Are there concerns or issues related to the VRS user experience, including ease of use, quality of service (technical and interpreter-related), outages, the user complaint and feedback mechanism, account suspensions, or others?

A2:

54. **CM#1:** "My experience was where there were some issues about the outages when waiting for the next turn, and I was not reconnected as it was a rude interruption without any notification."

There are some concerns about the quality of service related to interpreters as this appears to be an issue for a Deaf person who happens to be Indigenous. This situation is challenging when seeing an interpreter misuse the sign for "Indigenous," "First Nation," etc. The concern is that the signs are incorrect, and the attitude with facial expressions is something that the interpreters need to improve, show more courtesy, and act professional rather than appearing unmotivated or disinterested in working and interpreting.

The interpreters should recognize that they are fortunate to work from home rather than commute in the long hours of traffic and drive from point to point. Why should the interpreters be complaining or showing a lack of friendly face and ready to interpret for the clients when they have flexible hours and work from home, which is the advantage they have.

From my point of view, interpreters need to take the following three areas of training:

- a. Gender-Based Analysis Plus (GBA+)
- b. Indigenous cultural awareness & sensitivity
- c. Diversity & Inclusion training (includes Deaf-Blind sensitivity)

There needs to be more training for the interpreters, which would help the interpreters better understand how to use the correct signs for different signs for the same word, such as Indigenous, First Nations, Native, Metis, and Inuit. For example, different ASL signs for cities, towns, provinces, and regions should be reviewed frequently for less strain on the VRS callers.

For example, Kitwanga is an Indigenous village where consumers use that vocabulary frequently. It is not helpful if the interpreter is unfamiliar and impatient with the caller."

55. **CM #1:** "In my opinion, since there are many concerns about the quality of interpreters, CAV is wasting funds because it is hiring less qualified interpreters. Therefore it needs to provide more and ongoing consistent training to maintain the higher quality of the interpreters.

There appears to have been a mass-hiring of interpreters during the COVID-19 pandemic with fewer criteria and requirements for the position of video interpreters. During COVID-19, the interpreters lacked supervision, working from home due to quarantine and isolation restrictions. These are factors that need to be closely looked at to improve.

Many student interpreters may have gone straight to work as VRS interpreters, and as a result, the Deaf callers are suffering and not getting functional equivalent services."

56. **CM#2:** "Two days ago, I was on a call with a credit card company, and I waited for 20+ minutes with an interpreter; finally, a representative answered. The representative had to ask me several questions to verify my identity before proceeding with assistance, and suddenly the interpreter said that she had to go due to the end of the shift and had to transfer my call. During the verification process, the transfer was a minute long. When I got an interpreter, the representative disconnected. (groans) I had to call all over again, and this ended up being a 40-minute wait until I got a representative again. That is an hour long just for a short question about my travelling out of the country regarding my credit card.

The quality of interpreters has mainly met a standard, but some interpreters working for Canada VRS were American, and subsequently, they were not familiar with Canadian provinces and names. Another thing I don't like is the limit of three calls per interpreter.

Most of the interpreters follow the colour code for shirts/blouses and the cobalt blue background, so that is good. The 9050 customer service is excellent and always answers my questions."

57. **CM#4:** "Privacy is a massive issue for customers. The VRS app has a user directory that appears to have been exposed to religious groups such as the Jehovah's Witnesses, and they have searched and found phone numbers to solicit and harass the customers. The user directory should be removed from the app.

The lack of screening of the interpreters for their signing skills by the independent body has been noticeable; therefore, the screening mechanism should be developed, created, and run by combining a few national Deaf organizations.

Whenever there is an outage with the service or servers, the CAV rarely notify their customers publicly. It leads to confusion and bewilderment among the customers, and they have had to wait until the service comes online. Imagine the 911 VRS is down while the Deaf customer or family member's life is in danger."

58. **CM#6:** "Yes, limited hours for the user complaint system; hours need to be expanded to accommodate technical issues with the platform. The platform NEEDS a significant overhaul."
59. **CM#3:** "I am a Mac Apple user. Mac users were delayed using SRV Canada VRS due to application issues. For some reason, [IVés](#)¹⁴ recommended the desktop software browser "Waterfox" to maintain support for legacy extensions (Flash) dropped by Firefox and Safari. I am disappointed in iVes for not keeping Safari as the primary browser. Finally, iVes got back on the Safari browser app once again. My point is that the platform company should have been more considerate to all Apple and Android or Windows systems users. I was without VRS for a considerable amount of time.
60. My other observation is that there is no internet browser calling platform available, which Convolink is currently providing. CAV must provide the option of Video calling while using an internet browser solution.

Other technical concerns I have with regards to SRV Canada are:

- The quality of video calling apps uses an old 4:3 video screen ratio compared to Convo, Sorenson and ZVRS apps with a 16:9 ratio format.
- The current platform provider, [IVés](#), doesn't produce clear video on HDTV with mirroring as it shows a low resolution of 4:3, and as a result, the video is not of high quality and is instead blurred.
- This arrangement is embarrassing because, in the States, Convo, Sorenson and ZVRS currently use 1080p video resolution. Canada needs to catch up to its American counterparts."

61. **CM#3:** "For Deaf Seniors, Deaf-Blind, and those with low vision, it is crucial to have the ability to use VRS while on large television screens with complete HDTV. It is a concern that SRV Canada VRS should project the clear, high-resolution video on the larger screens, specific equipment must be provided, or apps should be made available on Apple TV and plugin play devices, such as Amazon Fire, etc. These would allow using VRS on TV screens with applications. For Deaf-Blind and Seniors, the hardware must be made available, and the choices and options for using VRS across applications and devices must be expanded.

Another concern is that CAV imposed a limit of one and a half hours for video conference calls. This limit is unfair since we usually have two-hour-long video conference calls. Where is our functional equivalency?"

62. **CM#7:** My concern has been with the user experience with interpreters in 2 separate but interrelated ways:

1.) I cannot have the VI# saved in history to reference that interpreter because I don't always have paper and pen handy to record this information. I would like it to be kept like the IP Relay history, automatically saved and archived. There needs to be an ability to reference the VI# in caller history.

¹⁴ Ivés tech support & platform for SRV Canada VRS <https://www.ives-inc.ca/>

2.) Often, I want to call and provide complimentary feedback about that specific interpreter immediately after hanging up. I have had at least five good video interpreter call experiences, and I have not been able to pass on the complimentary comments properly. I feel sad I haven't been able to do this. They deserve to receive wonderful feedback. Currently, there is no direct interpreter feedback mechanism. I am not comfortable contacting tech support to provide feedback about, or talk about interpreters, whether it is positive or negative, as I respect their Code of Ethics and the right to privacy and confidentiality of interpreters and interpreting situations. I would much rather have a separate line, a separate feedback mechanism for interpreters. Input about interpreters and these specific staff on the other end would have a direct line to the call centres to pass the feedback on to the appropriate VI #'s that should be recognized for going above and beyond, to be shown appreciation for their work.

3.) My third feedback about the user experience is that CAV imposed a limit of one and a half hours for video conferences or meeting calls. This limit is unfair, especially in job interviews or high-level executive management virtual meetings where you have to call in. Why should Deaf people lose a job because of this time limit? These limits are not functional equivalency. Hearing people do not have these limits. Why should Deaf people? Canada should strive for **Communication Equity.**"

63. Further to this, in DWCC et al.'s intervention¹⁵ for the proceeding TNC 2020-178, the committee introduced, instead of the functional equivalency concept by the National Association of the Deaf (NAD)¹⁶, the concept of "**Communication Equity**," a term coined by Mr. Christopher Soukup, of the Communication Services for the Deaf (CSD). DWCC wishes to remind the CRTC that *Communication Equity* means taking steps towards:
- Fewer substitutions for people on the "wrong" side of a barrier (such as those of us without the ability to hear) and more effort put towards removing the barrier.
 - Using multiple options and considering peoples' preferences rather than a one-size-fits-all solution based on assumptions about individual needs.
 - Recognizing that as technology continues to evolve rapidly, our communications accessibility efforts must evolve, too. Communication equity for the Deaf community demands safeguarding the services we have fought to create," said Mr. Soukup.¹⁷

¹⁵ DWCC et al. INTERVENTION for CRTC 2020-178 - <https://www.deafwireless.ca/DWCC-et-al.-INTERVENTION-for-CRTC-2020-178-27-August-2021.pdf>

¹⁶ Functional equivalent telecommunications - National Association of the Deaf - [link](#)

¹⁷ Communication Services for the Deaf (CSD) link - [Chris Soukup Receives Award for Humanitarian Efforts](#) (Eltouny, Leila, 17 August 2021)

QUESTION 3

Q3. Based on users' experiences and the information filed on the record of this proceeding, is it necessary for the Commission to impose specific quality of service standards on the CAV?

If so, what should those standards include and why?

A3:

64. **CM#1:** "CAV needs to review and develop updated interpreter certification, a Code of Professional Conduct (CPC) and an Ethical Practices System, including a separate complaint process for interpreters.

In our Deaf community, VRS cannot function without skilled interpreters. As a Deaf community member, I believe that CASLI certification must be the minimum standard for the qualification of VRS interpreters. CAV should have a good structure that encourages more fluid communications for the VRS users. Promote inclusion and accessibility in communications."

65. **CM#1:** "Additionally, CAV needs to look at more features such as alert services users about incoming calls and alerts via email or text."

66. **CM#2:** "I believe that the quality of service would improve with the technical issues that the app has. The "CAV VRS" app is hard to find on the App Store unless you type in CAV in the search box. Also, many people complain that the app hasn't been updated in a long time.

Lastly, where is the standard for Deaf-Blind Canadians? Deaf-Blind VRS users were excluded from participation in feedback mechanisms regarding the improvement of its app."

67. **CM#4:** "Yes, most definitely. Those standards should be:
- the screening of ASL/LSQ interpreters working in the VRS industry.
 - public notification systems must be set up and become standard.
 - educate the corporations, banks and government about the VRS, and they must accept that the VRS is a better option than the TTY relay services and,
 - keep the customers updated about the new services et al.

68. **CM#6:** "Yes, a watchdog is needed to ensure quality service and accountability on the CAV. Without it, CAV will answer to no one and will not be the best benefit for the Deaf users."

69. **CM#5:** "Yes, the Commission needs to impose specific quality of services standards on CAV. Quality of Service Standards on CAV is in question and needs further discussion and consideration regarding impartiality, oversight of the CAV board, and more transparency. It needs to be an independent body, perhaps a non-profit service organization that does NOT receive funding from the federal Government or CRTC. This way, there is no conflict of interest, and it promotes impartiality when handling feedback from the community.

QUESTION 4

Q4. Have there been any issues accessing 9-1-1 using VRS?

If yes, describe the issues and provide suggestions for improving access to 9-1-1.

A4:

70. **CM#1:** "I have not tried 9-1-1 via VRS yet. But what I heard is that:

- a. the 9-1-1 process takes a bit of time to transfer.
- b. another issue was that some Deaf individuals had trouble finding the wifi to get high-speed access for VRS to get the emergency service they needed while using wifi.
- c. here is a concern for those in remote and on reserve for those who are Deaf and need access to the internet, either wifi or wireless, to have their accessibility.
- d. It would be great to have reasonable data for cellphone users to have access to the mobile data to get what the client needs when it comes to using VRS from their cell phone."

71. **CM#2:** "I have used VRS for 9-1-1. There have been no issues, none. VRS usually contacts the local police department, and VRS has my personal information and location, so the system is effective. I have used 911 emergency a couple of times, and I had no issue with it."

72. **CM#4:** "Yes. I experienced the long wait while waiting for the 911 VRS a few years ago. The customers should call 911 VRS services, not the regular VRS services, and the network system needs to be improved and adapted, which automatically leads the customers to reach the 911 VRS with much more ease."

73. **CM#6:** "I can not reply. I have no existing experience in 9-1-1, not even in testing mode."

74. **CM#7:** "I experienced 9-1-1 VRS twice. Once I was outside on the street trying to call for a friend in distress. I had to walk 1km to get an effective wireless connection with the interpreter to get a clear connection. I was near Parliament when finally I was able to connect. It was difficult and frustrating communicating with the interpreter and myself with the blurry connection. We ended up cancelling the ambulance service.

The second time was when I discovered an unconscious person outside of an apartment suite, and I had to call emergency services. It was a puzzling experience because the interpreter, lucky I caught it, and I was able to lipread the interpreter reading off my account with my address, especially when I had just moved to a new town, it was inconvenient in the middle of a 9-1-1 call, where I spent 3 minutes updating my location information. And I had first-hand experience with how delayed the 9-1-1 transfer call experience was, phone Northern 9-1-1, find a local dispatcher, and discuss which emergency services to send. Paramedics arrived, and the VRS interpreter stayed on and shortly interpreted what the paramedics asked questions and then hung up. The interpreter staying for a few minutes with the paramedics was greatly appreciated, but the delay was unpleasant. The VRS app should have better built-in geolocation information to save time with the dispatcher."

75. **CM#3:** "There is a small red 9-1-1 button on the front left side of the screen of the device's display. It needs to be more prominent as the app's colour scheme is green and red. Perhaps a different colour will be better, i.e. black circle with red 9-1-1 letters to stand out better."

76. **CM#5:** "I'd like to share my personal experience: I was very fortunate to access 9-1-1 service quickly via my laptop for two medical emergencies in 2021. I can't speak for users of the 9-1-1 app on iPads and Smartphones.

As I recall, the quick response to my emergency was less than 15-30 seconds.

The 9-1-1 interpreter was calm and stayed with me until the ambulance came to my home site, and the interpreter continued to interpret on my behalf with the paramedics until I physically left home via ambulance.

Overall, I was able to stay calm despite the medical emergency. I felt the 9-1-1 interpreter's professional manner made a huge difference. Honestly, I am not sure if, in other situations, the person is alone and faced with a life-threatening emergency, then I feel that the best thing is to leave the app open to allow the geolocation feature to work. This 9-1-1 feature can also be covered under consumer awareness and education on this app."

VRS regulatory policy and the CAV

QUESTION 5

Q5. VRS is currently delivered by CAV, a centralized and independent administrator. Is there any evidence that the market context, including the availability of sign language interpreters, has changed since the creation of the VRS Policy in 2014 to such an extent that the Commission should consider introducing a competitive model for delivering VRS?

A5:

77. **CM#1:** "I have not seen much of the market context that the CAV delivered. It would be great to see more market context through promotion. For example, [The Daily Moth](#) delivers news in video using American Sign Language, and they also deliver the VRS market context during a commercial break, which is a way of getting recognized and sponsored by VRS partnership with The Daily Moth."
78. **CM#2:** "CAV monopolizes the current VRS industry in Canada since it's federally regulated. A competitive environment would encourage more innovative and new products."
79. **CM#4:** "No, but the CRTC should impose the policies and the guidelines for CAV in the best interests of the Deaf customers and the public. Also, they need to set up a neutral and external complaint mechanism."
80. **CM#3:** **I believe** that any Sign Language Interpreter agency should have connections and support from CAV. For this reason, we must support and expand Deaf Ecosystem across Canada, which makes Canada unique. The CEO has no right to impose a power trip and say "No" to any qualified Sign Language Interpreter agency which might establish a call center in a new region.

In this way, the CEO tries to limit the business competition between two video interpreting companies. CAV must support local qualified Sign language interpreter agencies so that way can get interpreters to become better quality interpreters at the same time support interpreters and accessibility in their local community."

81. **CM#6:** "I'm not sure if competition would be great, but resources and availability of interpreters (Canadian) can spur the need to improve and get 'more customers' for the competitors. However, Complacency is not good for a monopoly like CAV."
82. **CM#5:** "My view, as I am not sure if the Commission should consider introducing a competitive model for delivering VRS, justifies the costs and challenges of delivering the service with so many considerations.

The number one issue is that the interpreter pool needs to be expanded to allow a competitive model. Yet the current situation with funding and enrollment of professional sign language interpretation training and the shortage of professional sign language instructors and community interest remains a challenge. This has a trickle-direct effect on the pool of interpreters.

The biggest pro to delivering a competitive model to deliver VRS services in Canada would be the increased expansion of the Deaf Ecosystem with Deaf and hard of hearing people in top management positions and be more involved in the decision making and direction of the competitive model. The Deaf and hard of hearing people have lived-in experiences with VRS services and can apply that to making the VRS an excellent service.

Secondly, a competitive model would allow using a different platform than the IVES and customize more to the needs somewhat be restrained to just one platform.

Thirdly, a competitive model would allow customers to choose a VRS provider that suits their needs rather than CAV's SRV Canada VRS solution.

The fourth consideration is to have a two VRS providers system for the western provinces, and eastern provinces would help better divide the interpreter pool more equitably and expand the customer support chat online service in the western provinces.

Lastly, a competitive model attracts innovation and investment, and this would give a chance to Deaf, HH and other investors to have a stake in this company and have a sense of pride in a product that serves as a bridge between the Deaf/Hard of Hearing community and the wider hearing community. It is not just about accessibility yet more than that.

The CAV service is still less than ten years old, and a concept that is not entirely as developed as the US with a much larger population of users is another matter."

QUESTION 6

Q6. Is the CAV's current structure, including its Board of Directors and mandate, still appropriate?

A6:

83. **CM #1:** "In my opinion, there is limited information about the current structure, including its Board of Directors. Otherwise, this website looks good. It would be nice to have ASL friendly video shown to browse the CAV's website. One thing that puzzled me is that this caught my attention as the CAV link that mentioned the list of the stakeholders, and I realized that this new organization called *Sign Language Interpreters of the National Capital (SLINC)* might cause some puzzles to other stakeholders like CASLI that has been here for a long time. I feel that this SLINC organization needs to be promoted and shared with the Deaf community as this is very recent news which our Deaf community may be unaware of."
84. **CM #2:** "The CAV Executive Director, Sue Decker, came from America. While we thank her for her service, I believe it's time for a qualified candidate from Canada to take the opportunity."
85. **CM #4:** "No, because there is a lack of DDBHH representatives on the Board."
86. **CM #5:** "I am not certain if it is still appropriate because there has been very little visibility of this Board's activities and reports on oversight of the CAVRS. It was visible when the CAVRS first came out in 2014. Then all the interest had gone quiet in the past several years. To improve this process would require more thoughtful discussion among the stakeholders."
87. **CM #6:** "There should be an everyday/ordinary Deaf grassroots member or a member at large. Most members on Board are out of touch/reach of Deaf grassroots Community."

QUESTION 7

Q7. Registered users who are Deaf or hard of hearing currently elect three members of the CAV's Board of Directors: one ASL Director, one LSQ Director, and one joint ASL - LSQ Director. Telecommunications service provider (TSP) stakeholders elect two TSP Directors. Does this method for selecting Directors require improvement? If so, provide a rationale for this position and suggestions for how to improve the process.

A7:

88. **CM #1:** "From my point of view, this would be nice to see more Diversity and Inclusion as we need more Indigenous, Black, and People of Colour (IBPOC), Deaf, and Hard of Hearing people on this TSP directors."
89. **CM #5:** "No, except we need to add one or two more Deaf Board members. They should make periodic announcements to notify the customers of what is happening because they seem to keep them in the dark subconsciously. They need to be more open to them because the customers seemingly are not aware of the Board members."

90. **CM #3:** "No, Once we obtain the National Contribution Fund (NCF) from our taxpayers. We must change and remove telcos directors to respect community agencies or organization directors to ensure the best representation and mandate to meet our Deaf, Deaf-Blind and HH community."
91. **CM #6:** I feel that a regional ASL director should be added. The West and East coast needs are not the same, and the position should reflect that.

QUESTION 8

Q8. Is there a rationale for expanding the CAV's mandate to give it the flexibility to administer developing and future message relaying technologies?

A8:

92. **CM #1:** "This would be a great rationale for expanding the new technology. For example, [Sorenson](#) has this Wavello app that Sorenson VRS provides to see the person you are chatting with and the ASL interpreter. We need this feature for our Deaf community in Canada."
93. **CM #4:** "Yes, as long as they are greatly beneficial to the DDBHH community."
94. **CM #6:** "Yes, there is always an opportunity for improvement. If CAV VRS wants to keep customer retention high, they should host a town hall to receive feedback from the community to tune in to our concerns."
95. **CM #3:** "Yes, We must add Deaf-Blind and Low vision to administer developing and future message relaying technologies."
96. **CM #6:** "Currently, CAV's mandate "is if it ain't broke, why fix it?" We should strive to improve and keep up with today's technology instead of focusing on what existed five years ago and still use it."
97. **CM #5:** "I would say it is better to limit the scope of the CAV's mandate to focus on the VRS and leave the development and future message relaying technologies to a for profit company yet with extensive input and involvement of the Deaf Ecosystem."
98. **CM#7:** While the idea may be a novelty concept, I believe CAV should be kept within its scope to focus on video relay services and the text message relay industry to be kept separate. The text message relay service is a whole different beast but should have its administrative system with better and improved input from Deaf, Deaf-Blind and Hard of hearing community members. Save more details for a separate proceeding."

Funding

QUESTION 9

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?

A 9:

99. **CM #4:** "Yes, it is, but it should be beyond 30 million dollars to improve the services and the apps as part of the investment for the customers' benefits."
100. **CM #3:** "No, I'm getting the impression of CAV being underfunded and deprived of our ability to obtain High-Quality 1080p Video Calling resolution. CAV and Ivés have failed to provide the highest quality of video relay services. There needs to be an increased cost and investment in a total overhaul of the platform to allow for better video calling experiences, providing video screens with 16:9 dimensions. If Zoom can do it, why can't *SRV Canada VRS*?"
101. Adjustment to the incoming funds for VRS should also include increased funds to accommodate the revised structure of the Board, with an Indigenous Deaf and Hard of hearing Board director and a Deaf-Blind Board director."
102. **CM #6:** "Not a numbers man, but the cap should be increased, waiting lines get longer during the daytime, we need more interpreters, ready to act when needed."
103. **CM #5:** "The \$30 million annual funding cap needs to be expanded if the CAVRS has more consumers using the service, offers more training of interpreters, and it would be practical to add a second platform other than IVES to handle more traffic and be more open-ended with continual improvements on the User experiences. This additional funding would also include more customer education aimed at non-profits, for-profit organizations and government bodies where the hearing customers may need to use the CAVRS service to connect with Deaf/Hard of Hearing people. For example, many organizations are already aware of the TTY/TDD and include that on their websites yet are unaware about the new CAVRS technology."
104. **CM#7:** "CAV needs more than 30 million to have more customers using VRS, unsure exactly how much additional, but it must allow for the following:
 1. Ability to expand the pool of sign language interpreters. Funds need to be made available to expand the output of student interpreter graduates by investing and assisting the current interpreter training programs to hire more staff to train and educate student interpreters so that the group of graduates is more extensive than it is currently.
 - a. Also, to provide consistent and ongoing training for interpreters, ie. Indigenous culture, Deaf-Blind, IBPOC sensitivity training, and regional/geographic ASL and LSQ vocabulary make it less work on the callers and make the calling experience less frustrating with fingerspelling.
 - b. Continue to find ways to make video interpreting an attractive occupation by offering flexibility, i.e. work from home, part-time options, and supporting the community interpreting.

2. There needs to be an additional feedback mechanism focused entirely on giving feedback about interpreters and not mixed up with technical support. Staffing needs to be created for this concept to make the system more effective, to support the interpreters and support the customers while respecting the Code of Ethics by not mixing up tech and interpreting feedback.
3. Customer service hours must be expanded. Those in the West are deprived of complete customer service, especially those who have to wait to come home from work to get technical support for their VRS. Thus, why not establish a second support call center in the West to have staff follow local hours and be open until 7 pm to better serve those in the West.
 - a. CAV should have invested in a platform providing better video quality than it currently provides. Callers are frustrated being stuck using video with 4:3 video framing and not 16:9. It limits its potential by not allowing the company that provides interpreting to provide its high-quality Deaf-friendly technical video platform.
 - b. There needs to be a browser-friendly version of VRS available and not focused only on applications. Look at Convo's "*Convolink*." This program would help VRS be accessible in public venues such as libraries and support Indigenous needing to access VRS in congregated areas due to limited internet connectivity in remote, on- and off-reserve regions.
 - c. More funds need to be put toward research and development if there is no competitive model. Technology should be innovative, attractive and accessible, and it is not currently either.
 - d. When they send new beta versions of updated applications for testing, they should not be picking people from inside the system for these beta testing or developer feedback pools. It creates biased feedback. They should be opening feedback mechanisms from random pools of VRS users and not selected.
4. An actual paid advisory committee should be established, composed of members from the stakeholder groups, to create more outreach and feedback mechanisms from the community members because many were left in the dark for so long. There needs to be better engagement and more significant opportunities for engagement from stakeholder member groups and organizations (the stakeholders that participate in the elections)
5. There needs to be dedicated staff focused on educating businesses, banks, and the Government about the relay services since, thus far, the focus of education and public awareness has been on the Deaf community and not on the hearing world. Government still seems hellbent on directing Deaf people to TTY services or their direct TTY line when they are outdated. There is a critical need to have the general public more aware and educated about the existing video relay services and have increasingly less awkward calls and hang-ups. There should be a creation of broadcasting partnerships to show VRS on broadcast TV, with CBC, AMI-TV, CTV, and Global to have a greater reach for promotions and awareness.

6. There needs to be an output or investment of funds geared toward one-on-one technical support people, a small group of Deaf staff, available to meet Indigenous, Seniors, Deaf-Blind, immigrants, and technical illiterate people. In the US, the VRS companies had people come into people's homes to install the video equipment. Here we want the same concept. There is no installation of equipment but installation and step-by-step walking through of installing the application on all devices and orientation to use the services for those who need and require it. This service improvement would expand the number of users of VRS in Canada if more people understood how to set it up and use the VRS applications technically.
7. Deaf-Blind needs Communication Facilitators at community service agencies to do tactile communication while making VRS calls. Funding support needs to go to these non-profit service agencies to hire the Communication Facilitators.
8. There needs to be a fund available for Deaf-Blind and those who cannot afford the equipment to access VRS. In the United States, the National Deaf-Blind Equipment Distribution Program (NEDBP) or "iCanConnect"¹⁸ is currently funded and run through State-government funds, but in Canada, it would need to be a federal solution, created by the CRTC."

QUESTION 10

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

A 10

105. **CM #1:** "I am not sure about this question."
106. **CM #4:** "No, because the 30 million dollars from the NCF seems to be enough."
107. **CM #3:** "Yes, we must have an annual report and ensure that they are putting an all-in approach to considerably improve the technical platform by expanding to allow for high-quality resolution of 1080p video calling and fully accessible for Deaf-Blind people and those with low vision.

The spending appears to be passive and not genuinely investing in the priority of quality development. We are supposed to be investing and spending as much as possible. What CAV has done thus far has a detrimental effect on our Deaf's ability to thrive.

I am unsure whether the NCF is appropriate to fund the VRS. They are allowing the telecommunication service provider (TSP) companies, who are most often hearing people, to have a say in the decision-making of the VRS services. I want to remove or have the TSP have a hands-off approach, and the funding is coming from taxpayers or the billing of a surcharge of people who pay internet or wireless billing, then the Deaf people have greater autonomy/ ownership in the decision making of the operations of Canada's video relay."

¹⁸ FCC Link - [National Deaf-Blind Equipment Distribution Program | Federal Communications Commission](#)

108. **CM#5:** "Yes, it would be great to include retail internet service revenues to contribute to the expansion of VRS funding because the CAVRS app is also heavily dependent on the use of the internet."
109. **CM#7:** "I like creating a solution that involves fewer hands in the pot by the telecommunication companies and gives greater power to the Deaf consumers in how they want the VRS solution to be operated. I am unsure if funding through the NCF is a viable solution. Instead, funds created from people's bills could create a larger pool of funds to expand the service to meet the needs and accessibility that is inclusive of Indigenous in remote areas as well as Deaf-Blind accessibility, as well as most importantly, create equipment programs that support people with lower incomes."

QUESTION 11

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?

A 11.

110. **CM #1:** "CAV must meet its requirements and release its annual application to release its NCF funding. This way, the public can see where this funding goes and their expenses on technology, services and promotion."
111. **CM #2:** "Would like to know how many and what percentage of the businesses, institutions, and individuals may receive VRS calls."
112. **CM #4:** "Yes, however, their spending, especially on apps and services, needs more detail. They should be the minimum; however, they could ask for several more million dollars as a major investment to improve the services, better apps, and more reliable and more robust networks."
113. **CM #5:** "I am not sure if I can answer this question sufficiently, yet an annual report is still necessary to keep track of all expenses and use up any leftover funds to continue on the new fiscal year but not reduce funding."
114. **CM #6:** "I don't know what the minimum is, but there should be more, more info released; the number of calls, duration of calls, number of interpreters, and other data should be made available for transparency purposes."
115. **CM #7:** "The requirement should be to spend the full 30 million dollars, identify priority areas, follow through, and provide the highest quality video relay services. The priority is the platform quality and should be stated in the minimum requirements and meeting requirements for accessibility of Deaf-Blind according to the Accessible Canada Act (ACA)."

Awareness and promotion of VRS

QUESTION 12

Q12. Is there sufficient awareness of VRS among sign language users, as well as among the businesses, institutions, and individuals that may receive VRS calls? If not, what additional measures are appropriate?

116. **CM #1:** "CAV needs to invest in outreach activities such as Indigenous centers, mental health, businesses, bank institutions and other service providers catering to non-users to create awareness of VRS. Also, their YouTube page is not organized. The videos need to be appropriately categorized with Playlists by subject matter.

Once again, I have not seen much of the market context that the CAV delivered. It would be great to see more market context through promotion. For example, The Daily Moth delivers news in video using American Sign Language, and they also deliver the VRS market context during a commercial break. This media exposure is a way of getting recognized and sponsored by VRS in partnership with the Daily Moth."

117. **CM #2:** "It takes time for the public to become accustomed to Video Relay Service. Many are not aware of this service, so that public awareness would be helpful."
118. **CM #4:** "No, they have failed to raise awareness of the VRS services for the corporations and the public; therefore, they need to focus on it as a top priority."
119. **CM #5:** "I think there is sufficient awareness of VRS among sign language users except for the seniors and people with additional needs. The population demographic needs more hands-on support in person, especially to set up the app and registration and to include the Deaf-Blind people."

As I mentioned earlier, there is little awareness among businesses and institutions to ensure that this VRS service is a different model of communication rather than TTD/TTY. More awareness is to expand the customer base and maximize the user experience with CAVRS more favourably."

120. **CM #6:** "No, not enough promotion. Need a bigger scale of promotion, perhaps in newspapers, the internet, and television, instead of promoting the deaf community. The hearing community needs education and awareness; the onus should not be on the deaf community. This plan may reduce the number of hang-ups. How come the video produced by the CAV "Do not Hang Up!" was not promoted on television?"
121. **CM #7:** "More education and awareness need to be done. The focus of the CAV seems to have been on the Deaf community, which is understandable considering they needed to grow the number of VRS users in Canada, but now it is time to switch gears and ramp up the education and awareness for the hearing callers. Teach and educate the hearing callers how to call the Deaf, Deaf-Blind and hard of hearing. Improve the equipment and features for Deaf people to be alerted when hearing people call.

Spread awareness about VRS on public platforms, television, broadcasting, the internet, and social media, using video and media to increase awareness among the hearing population.

Hire staff to increase awareness and educate businesses, banks and especially the Government. Many government agencies are still stuck on the old concept of telling Deaf callers to use the direct TTY lines when many no longer use TTYs or even have a device. The exception seems only to be those who are senior citizens or Deaf-Blind.

Create direct phone numbers for these government departments, businesses and banks so that Deaf people can call them directly, hire Deaf ASL or LSQ using staff to manage the calls to the public lines using the VRS platform, direct calling, point to point calls.

Now that COVID-19 numbers are decreased, the education and awareness team, coupled with the tech support team, need to start travelling again and do one-on-one support. Virtual provisions are not the solution and do not fit everyone, especially seniors who might not be familiar with Zoom.

More information needs to be spread out to the community, and this is not being done and seems only to be limited to CAV's own Facebook Page. The community is not helping as much as it could or should. More in answer to Q13."

122. DWCC members recommend that CAV create profiles on LinkedIn for access to the Professional network so more higher-level professionals can be aware of the existence of the video relay services. Additionally, the CAV should be on Twitter, where the telecommunications industry is most active with vast follower numbers, thousands of customers, with consistent engagement, and they can help spread the word among their customers."

QUESTION 13

Q13. What role should stakeholders other than the CAV take in promoting and increasing awareness of VRS, especially among the general public?

A13:

123. **CM#1:** "Stakeholders need to increase awareness of VRS to reduce barriers to access by all Canadians Deaf & Hard of Hearing to advance VRS networks. Issues need to be raised by and on behalf of Indigenous Deaf and Hard of Hearing Peoples on the path to the reconciliation to make room for communication and accessibility issues while promoting better affordable broadband internet and services in remote and rural areas. Stakeholders need to be aware that Indigenous DHH needs more support and cultural sensitivity regarding limited broadband internet."
124. **CM#2:** "Build relationships with community members. Listen with open eyes and understand what the community needs."
125. **CM #6:** "What is happening is we see videos, photos in social media, and how-to-manuals, but the focus is to explain how to use VRS. Instead, they should include VRS in their business models and promote the VRS, the service itself."

- 126. **CM #4:** "They should hold public meetings to raise and share VRS issues with the CAV Executive, the Chief of Staff, the Community Manager, and the Board chairperson."
- 127. **CM #5:** "Several possibilities. A non-profit or for-profit consumer organization within the Deaf Ecosystem can do this. The other would be an organization that promotes accessibility in the Telecommunications field."
- 128. **CM#7:** "More information needs to be spread out to the community, and this is not being done and seems only to be limited to CAV's own Facebook Page. The community is not helping as much as it could or should. This situation has slowed down the trickle of public awareness of the VRS in Canada."

This statement explains how the advisory committee made of members of the registered stakeholders needs to be created, and a Terms of Reference or Memorandum of Understanding is created between the non-profit stakeholder groups that outline that these stakeholder groups and organizations have a duty and responsibility is to assist in disseminating information to its members and at the same time advise and give direct feedback to the CAV board and administration."

Timing of the next review

- 129. Instead of typing what each Committee Member wrote, since many were sharing the same views, all of them have been merged and summarized in the answer by the writer below.

QUESTION 14

Q14. When should the Commission next review VRS?

A14:

- 130. **A14.** DWCC's view is that CRTC put off the VRS Review considerably longer than it should have. While we recognize that COVID-19 impacted the timeline, it is imperative that CRTC seriously consider reviewing it three years after the updated policy due to this proceeding's delay.
- 131. Canada's VRS system needs to be reviewed every three years for the next two reviews, and only when it stabilizes can it shift and change to an every-five-year review. The CAV and the *SRV Canada VRS* solution need to be more closely monitored, with the examination and monitoring of:
 - a. how the budget is put into use, as the entire 30 million dollars was only used in the recent fiscal year;
 - b. there is a removal of the 30 million dollar cap to allow for the platform to be fully Deaf-Blind accessible;

- c. a better platform company with better technical configurations; and can keep up with technology evolving and updating to new versions at a fast pace to compete with the latest computer and devices;
 - d. training for the interpreters and tech support is kept up with every software update
 - e. funding made possible for Communication Facilitator communication services for those who are Deaf-Blind and require tactile communication;
 - f. funding made possible for one-on-one technical support for Senior citizens, Deaf-Blind, those who are less familiar with using technology, and those with language deprivation or English as a second language.
132. The review of VRS still needs to take place every three years to ensure that the VRS stays on the continual growth of the consumer base, awareness, and quality of services of the interpreters, the platform, accountability, and transparency stay consistent.
133. We turn to other considerations the DWCC Committee would like to submit to the Review of VRS proceedings.

Other considerations

Platform

134. In the proceeding leading up to TNC 2014-187, all parties wanted one platform, and everyone agreed that CRTC must do what it can to ensure there is fraud prevention to prevent what happened in the States, and CAV has proved it has a system that does precisely that, and DWCC has no objection to the way the system is designed because it is working. It has prevented any potential fraud with this oversight mechanism. However, in 2022, we need better accessibility than the current provisions of the platform.
135. The resulting platform has been less than desirable. Many Deaf and Deaf-Blind people have not been satisfied with the technical platform and would like to see that Canada has other options for the technical design of the applications. DWCC has learned that many companies worldwide, especially in the States, have explicitly rejected the Ivés platform shortly after implementation because it has not met the standards that the companies were seeking in a video platform, and instead, they have gone for other platform companies.
136. Unfortunately, for us in Canada, *SRV Canada VRS* has become "stuck" with the subpar technical platform provided by Ivés.
137. DWCC supports the current system design and mechanism for CAV oversight of the platform, but its position is that Canadians should have choices, not just one video platform, but choose between more than one to sustain the values of video quality.

138. This issue was discussed by members advising during the Bell feasibility study, which led to the Mission Consulting Report, currently on record for TNC 2013-155, which led to TRP 2014-187. Any vendors, including interpreting service providers, should apply for the contracts for the platform and not be restricted to providing one service or the other. Currently, the system is monopolized. There should be freedom to provide any VRS programs and services even if one company can provide two.
139. As mentioned previously, the technical application for the *SRV Canada VRS* has much more potential than it is currently providing.

Technical

140. The application currently provides 4:3 dimensions of video, which is at least, and a minimum of 720p quality. This setting means that video communication is not high quality and consequently not clear and comfortable for video communications.
141. Deaf people need to have more signing space on the video screen, with a 16:9 dimension of viewing, with 1080p, and this is high and clear quality for video communications with the video interpreters for a smooth video relay service connection
142. The current technical platform is considered "ancient" and needs to catch up with the current technology. CAV is stalling and depriving Deaf Canadians of the best high-quality standards of video communication platforms.
143. What is especially true of new and emerging technologies is that CAV should also be working toward making additions possible for Canadian VRS consumers that are already available for those that use VRS in the States:
 - a. The ability to have three people on screen, where it is possible for the Deaf person to also see the hearing person on the screen while using the relay services with the video interpreter (VI)
 - b. The ability for SRV Canada VRS to include VI interpreter VRS included in Zoom calls.
144. Frequently, Deaf people want to write down the VI identification # to compliment or give feedback about the interpreter or the call experience. There is currently no automatic save of the VI# information. There should be a basic record of saved chat information, where phone numbers or reference number information relayed in the chat box can be automatically saved, just as is possible as a feature provided in the current IP-Relay communications. And the VI identification number is automatically saved. It is easier to report compliments or complaints about an interpreter faster.
145. DWCC wants a more Deaf-friendly platform that respects Deaf, Deaf-Blind, and Hard of Hearing Canadians' needs and wants.
146. There needs to be more thought and consideration to features that are accessible for the Deaf-Blind or even those with low vision or declining eyesight due to aging.

Font and Background Colours

147. For specific accessibility, there needs to be an addition of the option of having dark mode and the ability to have it as a default across all devices and platforms.
148. Another option for text and background colours needs to be added for accessibility for the Deaf-Blind or those of low vision, Black background with yellow font and black with green font. According to an iPad app, it is currently available as yellow background with black font (colour scheme #4) when we want the reverse to be an option.
149. People should have the option to be able to customize to their preference. For example, if a person wishes for a purple font, they should choose that colour font. Additionally, the ability to distinguish the caller and the Video Interpreter (VI) with the choice of a different colour for themselves and another for the VI in the chat box should be made possible.

Notifications

150. Many customers still complain that they never get a call from a hearing person, primarily because they are inadequate. It is not working,
151. DWCC sees that CAV tried to solve this with the Embrava Blynclight but with the concept that people had to pay for the flasher, which was a grave decision. Why do these customers have to pay for something connected to a free federal communications accessibility service? One flasher should have been provided to every customer free of charge instead of the technical lack of notification configuration.
152. Funding for research and development to enhance the notifications for the SRV Canada VRS services needs to be invested in for functional and communication equity.

Relay Service Provisions

153. DWCC is aware that CAV imposed a limit of one and a half hours for video conference or meeting calls due to DWCC's meetings with CRTC. This limit is unfair, especially in job interviews or high-level executive management virtual meetings where you have to call in. Why should Deaf people lose a job because of this time limit?
154. Suddenly limiting the use of communication of video relay service customers is not in compliance with the Accessible Canada Act. These limits are not functional equivalency. Hearing people do not have these limits; why should Deaf people?

During a Relay Call

155. DWCC members have experienced and are also seeing people commenting that it is increasingly becoming too frequent that interpreters are swapping and transferring to other interpreters in the middle of calls, which is rude and abrupt. There needs to be clear policies and instructions for the interpreters not to take calls if they have 5 minutes left for their shift and to take responsibility to communicate with the callers about how much time they have or for the application to somehow technically show the length of time the interpreter has to remain on the call.
156. It is not system-wide that the interpreters call back the VRS consumers when their call is disconnected. There needs to be an improvement in the technical capacity for notifications, especially for the interpreter calling back to the Deaf callers.

Interpreter feedback

157. Deaf community members have informed DWCC members that they are not comfortable with relaying interpreter feedback to the staff at the 9050 line.
158. It is DWCC's firm view that for privacy reasons, there should be a separate line established for feedback about the interpreters, specifically. It should not be relayed to the tech support staff. The type of feedback needs to be treated differently regarding the Code of Ethics and respect for interpreters' privacy and professional growth. A separate line should be established for this purpose and not be intertwined with the 9050 line. The automated chat save feature mentioned previously will help with reference information while making the feedback into a separate line for interpreters. This interpreter feedback line will also have staff who inform the interpreter service provider vendors of the feedback to pass to their staff.
159. The types of feedback would vary - compliments with a positive experience and complaints with negative feedback. There should be a direct avenue for feedback considering the privacy and respect of the ethics of interpreters' work.

Tech Support

Hours of Service

160. Let's reference the CAV website for *SRV Canada VRS*, at its Customer Service webpage¹⁹, and the current hours are as follows:

Pacific Time	6:00 AM – 3:00 PM
Mountain Time	7:00 AM – 4:00 PM
Central Time	8:00 AM – 5:00 PM
Eastern Time	9:00 AM – 6:00 PM
Atlantic Time	10:00 AM – 7:00 PM
Newfoundland Time	10:30 AM – 7:30 PM

161. DWCC's view is that CAV has never been considerate of its clients who reside in the West because the customers who live in the Pacific time zone get the least access when it comes to customer or tech support service. Most customers want to reach out to tech support at the end of the day, but they cannot.
162. These clients have until 3:00 pm to make tech support calls. DWCC would like to see more respect paid to those who reside in the West and customer services be expanded to at least 7:00 pm to allow those who come home from work to make tech support calls.
163. If CAV or Ivés balks at this, citing staffing issues, the recommendation is that the CRTC suggests a second tech support office established in the Pacific time zone to remedy the concerns in the updated policy.

Customer Support Staff

164. The customer technical support center staff needs to be screened better, as their attempt to have bilingual staff is not succeeding. Members of the DWCC and the ASL Deaf community have told us of their experiences. CAV must reconsider standards for language related to ASL and LSQ. Designate English/ASL or French/LSQ FLUENT staff.
165. **CM #8:** "In a simple enquiry to ask for help in retrieving my account password, as I could not get into the SRV Canada VRS app, I contacted Customer Support. I got a person who signed to me in ASL, but it was not their first language. The support staff member did not understand my request, asking for permission to remotely control my computer to find the problem. I did give permission, but it became clear that the tech person was not looking for the issue in the right place. I asked the person to stop what they were doing and let me do something else. I repeated the request several times before the tech staff member withdrew from the remote control. I feel that asking Customer Support staff to 'try' being bilingual is not fair if they have to communicate in their second language. If the CAV app can indicate a customer preferring

¹⁹ SRV Canada VRS website - <https://srvcanadavrs.ca/en/customer-service/>

ASL or LSQ for their interpreter/operator, it should be possible for the Customer Support to follow that language preference.”

CAV Staff person - Education & Awareness for Business & Government

166. According to the CRTC TRP 2014-659, education and awareness were added as a critical element to the success of the SRV Canada VRS solution, as recommended by the BC Video Relay Services Committee (BCVRSC) and similar groups in 2013.
167. DWCC sees that the CAV has done plenty of education and awareness for Deaf clients that use SRV Canada VRS but sees many issues with hang-ups, as banks and government agencies do not fully understand the SRV Canada VRS. As BCVRSC proposed, a staff person should be responsible for following up and educating the banks and government agencies and working on promotions and public awareness campaigns for the hearing population. It is time to switch gears and do a parallel campaign with education and awareness of the public hearing community and geared toward business and Government with an active and ongoing (not limited to just one year of 2018-2019 but every year, on going) public relations campaign with broadcasts on the internet, social media and through television and broadcasting outlets.

Complaint and dispute resolution

168. Members of the DWCC are not satisfied with the current complaint management and mechanism of the CAV. It has encountered horrific experiences of trying to go to the CRTC and complain about its unresolved issues with the CAV, only to get referred back to the CAV, the very people with whom they were having the problem. There is no oversight of the CAV itself.
169. A separate component of feedback for the CAV ecosystem. Where can the customers go higher than the Executive Director? The Board listens to the Executive Director. They are the last person in the chain of command. What if that person is the one that sweeps the issues and problems under the couch or bed, figuratively and literally.
170. This practice must stop, and a neutral ombudsman-type system must be established that is also fully accessible for the Deaf and hard of hearing and entirely outside the CAV ecosystem's periphery. There must be a safe harbour for accountability of the CAV and the Board itself. CCTS provides a reasonable complaint and dispute resolution model, including mediation and conflict resolution.

Interpreter Training

171. Clients still need to educate interpreters with fingerspelling of locations and information from a different geographic areas in Canada. It needs to be the responsibility of the education and training department for the Interpreters to get ongoing and be required to take repeated workshops with a review of local jargon, including location names, and street names, so that there is less burden on the customers when they call into the interpreters. The interpreting vendors must keep track of when and the frequency of the training of the interpreters for this jargon.

172. Interpreters need sensitivity training for Indigenous, IBPOC, and Deaf-Blind as issues are coming up for these types of consumers. The Interpreters need to be better prepared for the Deaf-Blind consumers.
173. Even with the Canadian VRS solution, there is an interpreter shortage. The current interpreting education training programs still do a slow output of producing professional sign language interpreters to fulfil the pool of demand for community interpreters and video relay interpreters.
174. As proposed back in 2013 by several interveners, the issue is raised once again. The CRTC or the Ministry of Industry should also create 5-year additional funding to support the expansion of interpreter training programs across the country to expand the growth of interpreters for the VRS industry. This funding would allow for more staff and more intake of students into the programs or even create an additional interpreter training program or centre.

CAV Board Structure

175. DWCC would like to see equity access provided to Indigenous Deaf and Hard of hearing community members, especially in light of the Accessible Canada Act, the Indigenous Language Act, and especially in recognition of the UNDRIP guiding principles, especially in the community sections 21 and 22.
176. There needs to be more significant effort put into supporting resources for Indigenous Deaf to access Video Relay Services, including providing support to these specific Indigenous. They request assistance to have internet installed or provided in their remote or isolated area. The efforts need to be made with a solutions-focus, to work with the CRTC and the Broadband fund to make this possible.
177. Currently, the CAV Board has 3 DHH Directors, and while we support this, there have been great strides since its initial establishment, and our federal government has recognized three languages as the primary languages of Deaf people in Canada, ASL, LSQ and ISL. In light of this and the spirit of Truth and Reconciliation, DWCC believes it is appropriate that the third Director, either ASL or LSQ and chosen by the ASL and LSQ director, be replaced with an Indigenous DHH Director. DWCC has a consultant on its team, and we support involving Deaf persons in leading Indigenous, Black, Persons of Colour (IBPOC) sensitivity training.

Deaf-Blind Director on the Board of Directors

178. Additionally, DWCC believes that the CAV should have a Deaf-Blind director to ensure customer representation at the board level. This addition would bring the recommended number of Deaf and Hard of hearing directors to four, including Deaf-Blind.

179. DWCC does not see a problem with this number, considering that the Broadcasting Accessibility Fund (BAF)²⁰ currently has four accessibility directors representing Deaf, Blind, cognitive, and physical disabilities. DWCC asks the CRTC to re-examine the structure and administration of the Board and directors.

Support for Deaf-Blind

180. The DWCC fully supports everything that the Canadian Deaf-Blind Collective (CDBC.VRS) has to say about VRS accessibility for Deaf-Blind Canadians. It is time that the CRTC commits that the CAV ensures that the platform and all of its services are provided in full accessibility to those who are Deaf-Blind.
181. CRTC must ensure the technical platform and application is fully accessible for the Deaf-Blind, with additional modifications for colours to meet the customer requirements. Our Committee has communicated with CDBC.VRS group to learn about more colour options for their accessibility and that they need the opposite of the current "*Color scheme 4*," which is a yellow background and black text, they want the option where the background is black, and the font is yellow. This option is not in the list available in Text settings. We wholeheartedly support this option as this is also preferred by those with low vision. Any other technical specifications that the CDBC.VRS desires, DWCC supports fully.
182. Additionally, there must be funding provided for two things: a National Deaf-Blind equipment program and a fund that goes to several agencies to provide available tactile communication facilitators (CF) who can watch the VRS on screen and transfer the information from the screen through tactile sign language to the Deaf-Blind consumers. This arrangement is currently provided by the Deaf-Blind Service Centre (DBSC)²¹ in Washington State, which has a website which describes these services.
183. DBSC has a Communication Facilitator (CF) or "CF Program" that would benefit the Deaf-Blind population in Canada. Canada should have funds made possible to provide this type of service mandated by the CRTC. To paraphrase their description, "a CF is a sighted person, whether they are hearing or Deaf, who use tactile signing with the DeafBlind person to access a screen device, like a Video Phone (VP) to make phone calls. It could be through any webcam device: a computer, iPad, or iPhone. DeafBlind people can use technology to make phone calls to arrange appointments with their doctor, dentist, or hairdresser. Calls may go through VRS (Video Relay Service), and the CF would relay information to the DB individual while making those contacts."²² There needs to be funding provided to service provider agencies in Canada for such support services.
184. This funding needs to be mandated and created by the CRTC as such as something similar also available in the States' National Deaf-Blind Equipment Program (NDBEP) to support our Deaf-Blind community members that need it fully. Many of these Deaf-Blind do not hold full-time jobs and are on social services, and yet need expensive equipment to have the ability to communicate and keep up with information that they often fall short on. The Accessible

²⁰ Broadcasting Accessibility Fund (BAF) - <https://www.baf-far.ca/en/board-directors-and-staff>

²¹ Deaf-Blind Service Centre (DBSC) - [Deaf-Blind Service Centre](#)

²² DBSC - Communication Facilitator Program [CF Program | Deaf-Blind Service Centre](#)

Canada Act is here, and we need to emphasize that Deaf-Blind Canadians need access to information and communication. This means funding must be created, and the programs and services are made available to the Deaf-Blind to achieve equity with sighted Deaf and Hard of Hearing Canadians.

One on one support for Indigenous in Remote, Deaf-Blind, Seniors

185. DWCC has two members on its team who are Deaf-Blind, and they have advised us that members of the Deaf-Blind community would benefit from one-on-one product support technicians that provide in-person technical assistance. Deaf-Blind, Deaf Seniors, Deaf with disabilities, immigrants who do not have digital literacy, and those Indigenous who are unfamiliar with internet and technology needs would greatly benefit from a small group of staff available to meet these consumers with increased technical needs.
186. In the US, the VRS companies had people come into people's homes to install the video equipment. Here, in Canada, we want the same concept, only there is no installation of equipment but instead, installation and step by step walking through of installing the application on all devices and orientation to use the services for those that need and require it.

Calling our Americans - VRS platform Video interoperability

187. DWCC understands that the CAV had deferred discussions about international calling, but we tell you that Canadians have now waited long enough. It's five years now. Canadians would like to call their family and friends who use VRS. It is not only these family and friends but also banks for those who have accounts in the States and direct VRS services such as Dawn Sign Press²³ to order our sign language instruction materials and Disney for Disney vacation bookings. Deaf Canadians also currently can't call and discuss business with Deaf businesses in the United States. It is time to work toward and work with the FCC to ensure interoperability between the American VRS platforms and the Canadian VRS platform.

Current Executive Director / CEO

188. DWCC members are very disappointed at the current Executive Director for not doing what it envisioned, to be an impassioned and respectful person coming in, setting up and ensuring it is a 100% Canadian solution, entirely staffed by Canadians. It was expected that the person hired would remain for a limited time and then leave after the start-up work was completed and a qualified Deaf Canadian was in place.
189. DWCC asks that the CAV Executive Director step down and allow the Board to select a qualified Deaf Canadian to do the job. The CAV and SRV Canada VRS solution was meant to be a Canadian-led service, and it needs to be rightfully so. The Deaf Canadian Ecosystem has

²³ DawnSignPress - VideoPhone contact information - <https://www.dawnsign.com/contact-us>

seen the need for developing future leaders in Telecommunications and other technology fields to encourage our youth to “reach for the stars.”

Conclusion

190. With the enactment of the Indigenous legislations, whether they be on the international level with UNDRIP, UNCRPD, which Canada ratified and acceded to, and federal, about the bill respecting the UNDRIP, Indigenous Language Act, and the Accessible Canada Act, times have changed. This new legislation at the federal level means that all federal services are now required to adhere to new requirements to ensure the inclusion, diversity, equity and accessibility of all those who live in Canada, including the Indigenous. This requirement includes the CRTC and the CAV administration organization and ecosystem.
191. Whereas, CRTC must ensure that Indigenous and Deaf-Blind needs are considered when rendering its policy decisions for the new Canada Video Relay Service outcomes and standards to ensure it is updated and accessible to all who use the service. This includes restructuring the board structure that includes Indigenous and Deaf-Blind directors.
192. Funding needs to be made for a “National Deaf-Blind Accessible Equipment Program” to allow Deaf-Blind to obtain devices to keep up with information and communication as enshrined in the Accessible Canada Act.
193. Technical updates and fixes need to bring the standard to an accessible level for Deaf-Blind users, including ensuring the chat box is configurable to braille devices and more options are provided for background and text colours. There needs to be a survey among identified Deaf-Blind *SRV Canada VRS* users to determine if the current design for adjusting text sizes is accessible.
194. With the pandemic, the possibilities for enhanced video platforms can be made a reality, with integration into Zoom and allowing for a third person to appear in the video call. CAV should now work toward technically developing the platform to make these enhancements a reality to the benefit of *SRV Canada VRS* users.
195. Resources and staffing need to be put into place for Communication Facilitators and one-to-one technical support workers to work with indigenous, Deaf-Blind or technically struggling individuals.
196. The support hours for technical customer support need to be expanded so the West can benefit from hours later in the day. A separate complaint mechanism needs to be created for interpreter feedback. External and outside the CAV ecosystem, an ombudsman system needs to be created and established with direct contact for feedback and dispute resolution to keep the CAV accountable.
197. There needs to be sensitivity and education training provided to all personnel in the CAV Ecosystem, covering topics related to Indigenous culture, Deaf-Blind accessibility, and geography-related ASL and LSQ signs and terminology for the benefit of all the VRS consumers and callers.

198. There needs to be a shift from promotion and awareness to Deaf consumers to include the hearing businesses, banks and government departments with concurrent ongoing public relations on television and broadcasting outlets, including the internet and social media. *SRV Canada VRS* needs to be out in the mainstream for greater awareness and to add the appropriate staff resources to fit this need.
199. The DWCC offers the following recommendations for the 2022 Review of Canada's VRS:

Recommendations

Indigenous

1. In the spirit of Truth and Reconciliation, and in recognition of the Accessible Canada Act recognizing that Indigenous Sign Languages are one of the primary languages of Deaf people in Canada, there should be an Indigenous Director in addition to an ASL and LSQ Director.
2. Indigenous culture sensitivity training for the video interpreters (VI)
3. One-on-one in-person tech support and training are available to all Indigenous in remote, on or off reserve.
4. Provide extra support to help new users for the service, get set up and receive help to make VRS an easy part of their lives on the reserve and off-reserve.
5. Create outreach specialist teams to reach out to Indigenous DHH who live on the reserve, off-reserve, remote and rural regions.
6. Ensure that local centres have access to VRS for Indigenous to congregate and use VRS at these centres, for example, libraries, community halls, health centres, band offices, or First Nation Schools in the reserve regions.
7. *SRV Canada VRS* must be made accessible to accommodate Indigenous DDBHH communities.

Customer Support & Feedback System Mechanisms

8. Increase the hours for customer support that allow the West to have complete support services up to 7 pm, and if that means setting up a second customer service centre in the Western region, make it possible.
9. Chat text automatically saves the video interpreters' identification numbers in a chat log history, with automated reminder pop-ups instructing them to save.
10. Separate the feedback mechanism for compliments and complaints about the video interpreters to a separate direct number, and not mix it with the tech support line.

11. External, neutral, ombudsman type of mechanism that supports the mediation and resolution of complaints and issues with the CAV to ensure the CAV's accountability.

Deaf-Blind

12. *SRV Canada VRS* is fully accessible to Deaf-Blind in three different ways below (paragraphs 13-15):

13. One-on-one in-person tech support and training **are** available to all Deaf-Blind customers and DDBHH senior citizens.

14. Technical capacity accessibility for Deaf-Blind includes:

- a. adding more options to colour schemes in the background and text options, and ensuring the text size feature is accessible for Deaf-Blind to see and choose the options.
- b. Chat text box is compatible with braille screen reading devices for Deaf-Blind
- c. *SRV Canada VRS* app can directly "screen mirror" the app from the smartphone, iPad or laptop screen onto the smart televisions.
- d. the addition of the *SRV Canada VRS* application to smart televisions menus
- e. Addition of *SRV Canada VRS* apps on streaming devices, for example, AppleTV+, to allow for the use of VRS on large television screens for Deaf-Blind and senior users of VRS.

15. Funding to become available for:

- a. CAV-qualified Communication Facilitators (CF) for Deaf-Blind accessibility to VRS.
- b. Service organizations and agencies support the concept of Communication Facilitators for Deaf-Blind to come to the agencies to get one-on-one tactile support of video calls and use VRS.
- c. National Deaf-Blind Accessible Equipment Program (NDBAEP) for the provision of equipment for information and communication to meet the Accessible Canada Act requirements.

16. Board of Directors of the CAV - the addition of a Deaf-Blind Board Director.

Technical

17. Ensure the CAV works toward the enhancement of the video platform for the ability to increase the video dimensions and quality, allowing multiple video platforms.

18. The CAV must collaborate with the American VRS providers to develop video interoperability cross-border to allow Canadians to directly communicate using their VRS platforms with friends, family, and businesses in the States.

Training

19. Consistent and ongoing training for Indigenous culture, Deaf-Blind, and IBPOC sensitivity training, and regional/geographic ASL and LSQ vocabulary to make it less work on the callers and make the calling experience less frustrating with fingerspelling.
20. The Ministry of Industry must bolster funding investments in interpreter education programs and training to fast track an expansion of the pool of sign language interpreters to meet the demands of the growing base of VRS users in Canada.

Promotions, Education and Awareness aimed at Business and Government

21. Improving promotions and awareness to hearing callers working in organizations or institutions, such as banks, businesses, and government. Public Service Announcements (PSAs) and other materials are distributed through television and broadcasting outlets. This program can be done by creating a staff position dedicated to education and promotion to the greater public.

Funding

22. *SRV Canada VRS* funding cap should be increased to meet the new requirements that follow inclusive, diverse, equitable, and accessible (#IDEA) concepts.

197. In closing, DWCC appreciates the Commission's consideration of its Intervention 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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Parties to CRTC TNC 2021-102

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