



COMITÉ POUR LES
SERVICES
SANS FIL DES
SOURDS DU
CANADA



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

July 3, 2020

Call for comments – Provision of paper bills by communications service providers, Broadcasting and Telecom Notice of Consultation [CRTC 2020-81](#) (Ottawa, March 3, 2020) - Intervention

Dear Secretary General,

1. Deaf Wireless Canada Consultative Committee-Comité pour les Services Sans fil des Sourds du Canada (**DWCC-CSSSC**), Canadian Association of the Deaf-Association des Sourds du Canada (**CAD-ASC**), Canadian National Society of the Deaf-Blind (**CNSDB**), and Deafness Advocacy Association Nova Scotia (**DAANS**) [collectively, **DWCC et al.**] is pleased to participate in this important proceeding dealing with provision of paper bills by communications service providers. DWCC et al. expresses its interest in participating in any future hearing with respect to this matter.

2. DWCC et al. represents Deaf, Deaf-Blind and Hard of Hearing (**DDBHH**) people in Canada. This segment includes Deaf people with additional disabilities including those who are cognitively delayed, immigrants for whom English or French is not their first language, the Hard of Hearing, Deaf-Blind and those who use ASL and / or LSQ as their primary languages for communication.

3. Canada ratified the United Nations Convention on the Rights of Persons with Disabilities (**CRPD**) in 2010. CRPD Article 2 recognizes sign languages as being equal to and at par with spoken languages. CRPD Article 9 partly reads as (with underlining added for emphasis): *“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 ...”*

4. Canada proclaimed Bill C-81 in July 2019 which made Accessible Canada Act (**ACA**) the law of the land. ACA recognizes American Sign Language (**ASL**), langue des signes québécoise (**LSQ**) and Indigenous Sign Languages (**ISL**) as the primary languages of deaf people in Canada.

5. Communications service providers historically relied on CRTC for guidance on what accessibility means and how, where and when to best make their goods and services (including their billing practices) “accessible” to persons with disabilities, especially the DDBHH. Both CRPD and ACA make this practice obsolete and irrelevant since the current accessibility guidelines do not meet the requirements of all DDBHH consumers. CRPD and ACA now mandate communications service providers to follow and match all - not some DDBHH consumers’ accessibility needs (not the Commission’s definitions / guidelines) so that all existing and potential barriers in access to communications (including paper bills) are removed - ensuring all DDBHH consumers may and will lead completely independent lives.

6. The Deaf-Blind have a greater need for specific accessible technology that when combined with wireless services (Data, Text, Voice) enables them to have appropriate and independent access to information that would otherwise be inaccessible if provided in other formats. The higher costs of these technologies combined with inherent barriers in obtaining and maintaining employment resulting in lower incomes create insurmountable barriers in accessing these technologies..

7. The Deaf-Blind face bigger barriers when interacting with communications service providers. Some of those include but are not limited to; being unable to get to retail stores on their own due to wayfinding issues, being unable to communicate with retail store staff due to not being able to see to write notes or hear to have a voice conversation, not seeing or hearing information readily distributed in mainstream media, not being able to make a voice call or a VRS call or a relay call independently due to the combination of deafness and blindness, and having very limited or no access to services that would assist them in doing all the above things.

8. Therefore:

1. Websites need to be easily understandable and be written in simple language
2. DDBHH consumers must have a choice of how they wish to receive their bills - either in paper format or electronic or both as described below.

Printed paper format:

- a. Large print in the individual’s preferred font type and size
- b. Braille embossed in the individual’s preference of Uncontracted, Contracted or UEB (Unified English Braille)
- c. Some combination of the above

Electronic formats:

- a. MS Word without formatting
- b. Plain .txt files
- c. Intact printing on a PDF
- d. Audio files
- e. Some combination of the above

9. While there are standard alternative formats, each individual's needs are unique. The needs of the Deaf-Blind are different from those of the Deaf and the Blind. As such, the Deaf-Blind may need more flexibility in formats in order to meet their specific needs. Standard formats such as those already mentioned above must be available, but consideration must be given to special requirements for those that use adaptive technologies, for example, JAWS, Zoomtext, and Braille displays.

10. Sign language users need the following: 1) sign language videos with visual aids to supplement the subject matter 2) videos produced with captioning and 3) a separate accessible text transcript of the sign language videos provided. The captioning and the text transcripts caters to both the Deaf-Blind and DDBHH (especially recent immigrants) with different sign language fluencies.

11. ASL and LSQ Sign language videos must be easy to locate, and if they have already been produced, they need to be available separately individually from the playlists for the benefit of sign language consumers for *Understanding Your Bill*. This is essential for sign language users whose first languages are not English or French.

12. The accessible videos must be made available with specific titles and definitions, at the bare minimum for the following five different types of paper bills:

- The paper bill - explaining the parts of a paper bill.
- Positive credit - nothing is owed, bill is paid in full
- Negative amount/Balance owing - received paid with left negative amount - what does this mean?
- Overage - need to pay the overage - what does this mean?
- Account is suspended until get paid - account is on hold until payment - what does this mean?

13. Existing videos describing commonly used terms such as data, coverage, plan¹ must also be accessed with these sign language videos on the websites marked clearly under the wording "Bills."

14. Whenever DDBHH consumers contact their communications services providers with questions about their bills, paper copies shall be provided to match specific "technical or legal" words with their corresponding sign language definition videos posted on the providers' own websites.

15. In retail stores, essential technical, legal and regulatory information presented in English or French must be equally provided in sign language. Specifically, In-store iPads and tablets must be available, pre-loaded with sign language video versions of the Wireless Code, the Internet Code, and contract terminology. They must be kept near the posters that provide the same information in English and French.

¹ Videos produced by the CWTA as mandated in [CRTC 2017-200](#) and [CRTC 2019-269](#)

16. Retail stores often display glaring and colorful posters or similar media with written information in too small print to read. The information contained in these aforementioned media must also be available in accessible formats for Deaf-Blind consumers. To be more specific, the information must also be made available in sign language and in electronic format where the service provider staff may make the necessary font type and size adjustments on the spot to meet the Deaf-Blind accessibility needs. The same electronic versions may be sent to Deaf-Blind consumers'; devices which are already preconfigured (ex: those using braille displays) to match their accessibility needs..

17. Finally, it should be noted that the current practise for phone or internet service provider companies with consumers bills for payment is limited to only two options. Consumers can only have their bill printed and mailed OR have the electronic bill copy available via online links. Currently consumers can only have one or the other, it is our view that a third option be made available:

- 1) Printed and mailed paper bills
- 2) Online PDF format of the bills
- 3) Both printed and mailed paper bills and electronic formats available too.

18. As mentioned in paragraph 8, DDBHH consumers must have the choice of receiving their bills either in paper format or in electronic format or BOTH. DDBHH consumers **must** not be forced to pick one format over the other.

19. DWCC et al. appreciates the Commission's consideration of its Intervention and looks forward to its positive response. Should you have any questions, please do not hesitate to contact all of us.

Regards,

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cc Scott Hutton, CRTC
Stephen Millington, CRTC
Parties to TNC 2017-33, TNC CRTC 2014-188 and BNC 2011-523

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