



DEAF
WIRELESS
CANADA
COMMITTEE

COMITÉ POUR LES
SERVICES
SANS FIL DES
SOURDS DU
CANADA

Canadian
Association of the Deaf



Association
des Sourds du Canada



The Canadian National Society of the Deaf-Blind, Inc

Mr. Claude Doucet
Secretary General
Canadian Radio-television and Telecommunications Commission (CRTC)
Ottawa, ON KIA ON2

November 9, 2020

Call for comments – Establishment of new deadlines for Canada’s transition to next-generation 9-1-1, Telecom Notice of Consultation [CRTC 2020-326](#) (Ottawa, 4 September 2020) - Reply to Intervention’s Comments

Dear Secretary General,

Introduction

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**), and Canadian National Society of the Deaf-Blind (**CNSDB**) [collectively, **DWCC et al.**] files its reply in accordance with the procedures set out in CRTC TNC 2020-326 as amended. In these Reply Comments, DWCC et al. makes comments on some Interventions on the public records.
2. Any failure on DWCC et al.’s part to respond to any given intervention or any issue raised by any participating party should not be viewed as agreement with the said intervention or issue. As noted in its Intervention, DWCC et al. recognize the importance of proceeding dealing with the establishment of new deadlines for Canada’s transition to next-generation 9-1-1 (NG 9-1-1).
3. DWCC et al. acknowledge and reviewed Interventions from Bell Canada and Bell Mobility, Bragg Communications Inc., CISC ESWG, Coalition pour le service 9-1-1 au Québec, Comité 9-1-1 du SCFP-Québec, Competitive Network Operators of Canada (**CNOC**), Provincial Deaf and Hard of Hearing Coalition, Independent Telecommunications Providers Association (**ITPA**), Joint PSAP, Newfoundland and Labrador 911, Northwestel, PSBN Innovation Alliance Inc., Québecor Média Inc., Rogers Communication Canada Inc., Saskatchewan Telecommunications (**SaskTel**), Shaw Communications Inc., Tbaytel, TELUS Communications Inc., and Xplornet Communications Inc. and Xplore Mobile Inc. (**Xplornet**).

Response to Suggested Dates as Deadlines

4. Any dates proposed earlier are not recommended to be considered other than including:
 - A. Our recommended dates.
 - B. The dates the Commission suggests.
5. The reason behind our recommendation is that these dates may cause a hasty and rushed response and there would be a lack of consideration with regard to the care that must be taken for the education and awareness of members of our accessibility community, and the general public. In this regard, DWCC et al. is in support of both PSBN and Telus' intervention on this subject.
6. Some providers, such as Communications Inc. and Xplore Mobile Inc, express their concerns that the NG911 may not reach its best performance with the suggested dates. DWCC et al would like to emphasize that since NG911 will cover emergency calls we cannot risk lives for with lack of optimal performance in sporadic areas across Canada.
7. DWCC et al. is in support of PBSN's statements from paragraphs 11 to 15, in their intervention dated October 19, 2020, that subsequent dates for this proceeding also be considered in big part by the *force majeure situation caused by the COVID-19 pandemic*. DWCC et al supports that there needs to be creative ways for reasonable delays but instead limit the delays as minimum and adjust short-term delays with re-reviews and if necessary do short-term specific-topic proceedings per TIF to minimize the net delay incurred over all.
8. In addition it must be mentioned, DWCC et al. has not seen the letter that Sasktel mentions, *para. 9*, dated 16 October 2020, the specific letter written by Mr. Chris Kellett, Chair of ESWG group with regards to the ESWG TIFs. Please consider regulatory@deafwireless.ca in future group emails so accessibility groups are not left behind. To clarify, these regulatory emails are auto forwarded to members of this joint intervention.

Response to ESWG TIFs

9. DWCC et al. re-emphasize what they mentioned in its intervention, dated October 19, 2020, page 7, *para. 32*, that it is difficult to respond to any intervention's comment related to *Emergency Services Working Group (ESWG) TIFs* as it reads in *paragraph 32*:

In response to Emergency Services Working Group reports deadlines, the DWCC et al. finds it is hard to give a definitive answer to the proposed deadlines until we are fully included in all the appropriate ESWG TIFs. Several members of DWCC et al. are interested in different aspects of the RTT NG 9-1-1 transition. DWCC et al. members need direction and clarification on which TIF to participate in. Until DWCC et al. is fully included, we cannot give an answer.

10. Accessibility groups have once again been left behind, and no effort has been made to reach out to DWCC et al. to communicate and clarify, so that members of its team can organize representatives to get involved in the correct ESWG *Task Identification File* (TIF) committees with specific tasks.
11. It must be noted that since it is challenging to be involved in the weekly meetings especially since it is **unpaid/ volunteer time** for members of the critical accessibility organizations, and due to a lack of communication, DWCC et al find themselves obliged to stay out of these meetings and related discussions until they get full information. The lack of communication has led DWCC et al. to be left unclear and confused with regards as to which specific TIF task committee to participate in with the subject matter that is essential for this specific accessibility group.
12. As a result, effective immediately, DWCC et al. wishes and requests the Commission, takes this into consideration, for specifically the CRTC ESWG TIF committees, to find a solution to ensure that accessibility groups are able to be included and involved to represent Deaf, Deaf-Blind, and Hard of Hearing, to ensure that the insurmountable challenges this accessibility group faces are resolved in time for the rollout of the launch of NG-911. Lives are at stake.
13. There is ongoing confusion as to which committee DWCC et al. should be participating in, as they were referred to wait for another TIF and for example DWCC et al. is still unclear which TIF involves the following critical topics:
 - A. Which committee can discuss the education and awareness of the transition for Text with 9-1-1 and Real-Time Text for Deaf community members, especially seniors and Deaf-Blind. DWCC et al has a responsibility to be considerate of the micro-groups of Deaf-Blind and senior citizens whose lives' still depend on older technologies and assist in preparing them for the transition as well.
 - B. Where is the committee that DWCC et al. can argue and debate the merits of the mobile technical capabilities with texting in 9-1-1 situations. Currently, *Text with 9-1-1* fails to meet current consumers' concerns and must transition to direct **Text to 9-1-1** capability especially for when the smartphones are in low bar connectivity regions where Real-Time Text (RTT) 9-1-1 will be rendered ineffective. DWCC et al. wants to discuss with industry decision- makers, to ensure fallback options are made available that include direct texting to 9-1-1 PSAPs. This is a grave concern to our consumer group.
 - C. Where is the committee that DWCC et al. can discuss with regards to backward compatibility to landline TTYs to accommodate the needs of the Deaf-Blind and senior citizens that still use the TTY devices, or those still using TTY software on their computers? Interoperability is a great concern for our consumer group. CRTC and NG-911 organizations are forgetting that Deaf-Blind and senior citizens lives' still depend on older technologies, and concessions must be made in consideration of their needs in a transition period.
14. Conclusively, members of the DWCC et. al would be able to spread out and delegate topics to certain members of the committee once these questions are answered as specific people are interested in specific topics.

Response to DHH Coalition's name

15. Related to DHH Coalition's intervention, DWCC et al would like to take steps to clarify that this coalition, despite the name, does not represent Deaf and Hard of Hearing in Canada. DWCC et. al asks DHH Coalition to revise their misleading name and their misleading introduction (paragraph number 1 in their intervention) and advise all joint intervention that this coalition, which consists of the 3 organizations: Ontario Association of the Deaf (**OAD**), Newfoundland & Labrador Association of The Deaf (**NLAD**), Deafness Advocacy Association of Nova Scotia (**DAANS**), and these organizations only represent the specific provinces of Ontario, Newfoundland, and Nova Scotia respectively. DHH Coalition has no access to any information in other provinces, and it is only CAD-ASC, as the national information, research and community action organization of Deaf people in Canada, that has the access to the information through their provincial and regional affiliates.

Conclusion

16. It must be noted that DWCC et. al has not seen the responses to our intervention with the outlined concerns especially for Deaf, Deaf-Blind and hard of hearing Canadians, and as a result, requests a final reply phase to be allowable for us to respond to others addressing our concerns. DWCC et al. requests an opportunity to respond back on the record. Do kindly advise if we are able to do so in 10 business days' time.

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

Regards,

Lisa Anderson, Acting Chair
Consultative Committee
Deaf Wireless Canada
regulatory@deafwireless.ca

Wissam Constantin, Vice President
Canadian Association of the Deaf -
Association des Sourds du Canada
wissam@cad.ca

Nicole Marsh, Secretary
Consultative Committee
Deaf Wireless Canada
nicoledoc2020@gmail.com

Megan McHugh, President
Canadian National Society of the
Deaf-Blind
mchugh.mm@gmail.com

Cc:

Scott Hutton, CRTC
Stephen Millington, CRTC
Parties to TNC 2020-236

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