



DEAF
WIRELESS
CANADA
COMMITTEE

COMITÉ POUR LES
SERVICES
SANS FIL DES
SOURDS DU
CANADA



Canadian
Association of the Deaf

Association
des Sourds du Canada



The Canadian National Society of the Deaf-Blind, Inc

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

October 19, 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) - 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**), and Canadian National Society of the Deaf-Blind (**CNSDB**) [collectively, **DWCC et al.**] is pleased to participate in this important proceeding dealing with establishment of new deadlines for Canada’s transition to next-generation 9-1-1 (NG 9-1-1). 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. Members of DWCC et al. introduce themselves as follows:
4. **DWCC-CSSSC**'s mandate is to advocate for accessible wireless communications equality 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 current accessible wireless and mobile communication products and services.

5. **CAD-ASC** is a national information, research and community action organization of Deaf people in Canada. Founded in 1940, CAD-ASC's mandate is to protect and promote the needs, rights, and concerns of Deaf people who use American Sign Language (ASL) and langue des signes québécoise (LSQ) in Canada. We are the national information, research, and community action organization of people who are culturally and linguistically Deaf. We partner with national organizations of persons with other communication disabilities including Deaf-blind, blind, developmentally delayed, intellectually disabled, language deprived, and literacy challenged. We combine the purposes of a research and information centre, advisory council, representative body, self-help society, and community action group. We are the oldest national-level disabled consumers organization in Canada. CAD-ASC is affiliated with the World Federation of the Deaf (**WFD**), and is a United Nations-accredited Non-Governmental Organization (NGO) to the Convention on the Rights of Persons with Disabilities.

6. **CNSDB** was registered in 1985 as a national consumer-run advocacy association dedicated to helping Canadians who are deaf-blind achieve a higher quality of life. We advocate for new and improved services, promote public awareness of deaf-blind issues and gather and distribute information in order to help empower individuals who are deaf-blind to become full participants of society. CNSDB provides expertise in accessibility related to the needs of individuals who are living with the distinct disability of deaf-blindness, which is different from deafness or blindness due to being unable to use one sense in order to compensate for the loss of the other.

7. DWCC et al. understands NG9-1-1 is a big change, and ensuring it will be accessible to all users is quite a significant undertaking. With Covid-19 impacting the ability to access resources from the workplace, and limiting the ability to meet in person, DWCC supports deadlines to be extended to a date deemed acceptable within an 18 month time frame. It is better to roll out NG9-1-1 at a slightly later date to have time for proper testing before implementation, than to release a service that isn't reliable and accessible to all Canadians."

Establishment of deadlines for outstanding existing NG9-1-1 milestones

8. Based on DWCC et al.'s experience with the historic complexities and the success of the establishment of Video Relay Services, DWCC et al. believes that the whole system design, establishment and launch of VRS was done within 18 months, therefore, it is reasonable to expect that a similar technical establishment can be integrated within 18 months, or even considerably less time.

9. The proceeding's suggestion of 1 March 2021 whereas NG9-1-1 network providers to file proposed NG9-1-1 wholesale and retail tariffs is reasonable, considering the final decision is released 18 months to this date, as seen in *paragraph 14*.

10. The proceeding's suggestion of 1 March 2021 whereas networks ready to operate, because the alpha and beta trials have not begun, it is DWCC et al's recommendation to extend the deadline an extra 6 months, to at least **30 September 2021**, with possible extensions due to COVID-19 pandemic impacts.

11. The proceeding's suggestion of 30 September 2021 whereas *interconnection specifications to support NG9-1-1 Text Messaging, and to file them with the Commission for information*, based on the fact that there haven't been any calls to DWCC et al. to participate in alpha or beta trials, it is our view and recommendation to extend the deadline to **30 December 2021**, to allow for awareness and recruitment of trial participants. There also needs to be acknowledgements that there would be potential extensions due to COVID-19 pandemic impact.

12. The proceeding's suggestion of 30 March 2022 whereas WSPs are directed to provide *NG9-1-1 Text Messaging based on Real Time Text (RTT) throughout their operating territories wherever their networks are capable of doing so and PSAPS have launched NG9-1-1 Text Messaging*. DWCC et al. views as long as they have satisfactorily launched and done an alpha and beta testing phase with Deaf, Deaf-Blind and Hard of Hearing Canadians for a maximum of six months, the date should be **30 June 2022**.

13. The proceeding's suggestion of **30 March 2024** set for the decommission of their *current 9-1-1 network components that will not form part of their NG9-1-1 networks*, DWCC et. al. agrees this is reasonable and the date should be unchanged.

14. It is not the consumer groups' prerogative to respond to the tariff regimes as the proceeding's suggestion of **30 March 2024** for the establishment of wholesale tariff regime is stretched time for simple financial regime, it should be reasonable as within an 18-month timeline, and should be **30 September 2022**.

Establishment of a new NG9-1-1 network in-service milestone

15. Whereas the proceeding asks if it is reasonable and appropriate for the Commission to introduce a new milestone associated with NG9-1-1 networks being in service. DWCC et al. has a perspective that yes, a number of milestones have been missed for these deadlines in this proceeding. Several contingency plans have been omitted. For Deaf, Deaf-Blind, and Hard of Hearing Canadians, education and awareness is a big component of the success of the transition to RTT 9-1-1.

16. Overall, DWCC et al has 80 ASL and LSQ Deaf, Deaf-Blind and hard of hearing candidates that we could offer up to be trial participants for alpha and beta trials of the

RTT NG-911 application or software build-in. Such alpha and beta testing trials with full interactive feedback processes into the input of the design of RTT should take a maximum of 6 months for full input before it is finalized for launch.

17. The recommended additional milestone dates should be considered in the transition process: **December 30, 2020 - 12 months before launch of RTT NG-911, videos must be completed and released that announce or explain:**

- a. TTY sunset for 9-1-1 - explain what is or are the alternative(s)?
- b. Text with 9-1-1 update/phase out and introduction to RTT NG-911

18. It is very important to note that these videos must be made accessible to Deaf-Blind and Deaf senior audiences. Transcripts and captioning must be made available to be accessible to a wide range of consumers including those who do not use sign language.

19. DWCC et al. suggests infographic versions with sign language subjects overlaid on the video, using green screen technologies and advanced video editing skill sets. Deaf filmmakers and studios, and paid Deaf consultants need to be involved with this process including the script-writing.

20. In addition, despite the pandemic, efforts must be made to have educational awareness events such as online webinars with a presentation deck developed in collaboration by NG-911 stakeholder groups with our consumer groups. The educational events can be provided by our consumer groups with paid honorariums for the presenters and facilitators to provide it in their accessible language and format. Zoom has been a wonderful platform utilizing ASL and LSQ accessibility at once.

21. A summary of the deadlines proposed by DWCC et al. related to the transition of RTT NG9-1-1 follows:

- a. **December 30, 2020** - production of education awareness videos in accessible formats, ASL, LSQ, captions, transcripts
- b. **March 1, 2021** - launch of alpha and beta testing with consumer group member involvements.
- c. **June 1, 2021** - educational awareness events/webinar series begins 6 months prior to launch.
- d. **September 30, 2021** - RTT NG-911 trials complete with results.
- e. **December 30, 2021** - RTT NG-911 launched for public.

22. DWCC et al. emphasizes it is very important to have education and awareness involved in the transition process. A grave error has already been overlooked, despite concerns raised by our members in the Emergency Service Working Group (ESWG) TIF working groups. Deaf community members and especially our underrepresented groups of Deaf-Blind and Deaf seniors are unaware of the sunset of the TTY. Multiple dates set out in Telecom Regulatory Policy TRP 2018-182 have yet to be fulfilled in terms of deadlines. DWCC et al have yet to see the document produced as a result of policy paragraph number 181: whereas the CISC were to *recommend a plan for users of the existing Text with 9-1-1 service to transition to NG9-1-1 Text Messaging and*

submit it to the Commission by **30 June 2020**.” The missed deadlines that have not been met are outlined in [Telecom Regulatory Policy TRP 2020-182](#), seen below:

177. *On the other hand, RTT (i) is an IP-based solution, (ii) is supported under the NENA i3 standard and is standards-based for originating networks and devices, (iii) can be routed to the appropriate PSAP, (iv) can provide location information, (v) is delivered in real time, and (vi) supports the transmission of multimedia information. Further, accessibility groups support the use of RTT and the FCC has mandated its use to replace TTY in wireless IP networks.* [Footnote 34](#) *RTT-capable devices are expected to become available in the Canadian marketplace in 2017, and Canadians’ use of these devices is expected to be prevalent by 2020, given the average two-year life cycle of mobile devices. The Commission therefore determines that RTT is an appropriate solution for NG9-1-1 Text Messaging.*

178. *With respect to the timing of the introduction of NG9-1-1 Text Messaging, allowing some time after the launch of NG9-1-1 Voice would (i) give PSAPs time to address any operational and technical challenges, (ii) mitigate the risk of service disruption, and (iii) allow for coordination between 9-1-1 stakeholders. Therefore, it is appropriate to introduce NG9-1-1 Text Messaging six months after the launch of NG9-1-1 Voice.*

179. *Testing of NG9-1-1 Text Messaging will need to be conducted in certain parts of Canada where all key NG9-1-1 stakeholders are ready and willing to do so. This testing should be conducted with PSAPs in both official languages.*

180. *In light of the above, the Commission determines that RTT-based NG9-1-1 Text Messaging will be the second method of communication to be supported on the NG9-1-1 networks.*

181. *The Commission requests that CISC develop the technical specifications for the implementation of RTT-based NG9-1-1 Text Messaging and submit a report to the Commission with its recommendations no later than **31 December 2017**. The Commission also requests that CISC develop and recommend a plan for users of the existing Text with 9-1-1 service to transition to NG9-1-1 Text Messaging and submit it to the Commission by **30 June 2020**.*

182. *The Commission **directs** (i) mobile wireless carriers to make the necessary changes to support RTT-based NG9-1-1 Text Messaging in their originating networks, provided that these networks are technically capable of supporting NG9-1-1 Text Messaging, throughout their operating territories by **31 December 2020**; and (ii) WSPs to provide NG9-1-1 Text Messaging to their customers served by networks that are technically capable of supporting NG9-1-1 Text Messaging, wherever PSAPs have launched NG9-1-1 Text Messaging, as of **31 December 2020**. The Commission also **directs** NG9-1-1 network providers to make*

changes to their networks to support the implementation of NG9-1-1 Text Messaging by **31 December 2020**.

23. As a result, DWCC et al. members have been shuffled around and it has been unclear exactly to which assigned TIF, to which this deadline and recommendations are to be reviewed and produced in collaboration with our consumer groups. The progress has been fragmented with the multiple TIFs. To be honest, the task has kept being deferred and DWCC et al. members have once again been left behind. Our consumer group is once again left feeling as an afterthought.

24. DWCC et al. 's response to the request of the questions listed in proceeding Question 2, seem to be technical in nature and are not applicable to our consumer group, but for as long as they keep to our recommended adjusted deadlines outlined previously under “*Establishment of deadlines for outstanding existing NG9-1-1 milestones*”, DWCC et al. is in the support of these milestones. The accessibility to NG-911 needs to be resolved before these major milestones are to take place. DWCC et al’s consumer groups cannot be left behind and there must be clearer communication to where DWCC et al. members fit in which task groups within the ESWG.

Emergency Services Working Group reports

25. DWCC et al. members have felt that the ESWG’s Task Identification File (TIF) system has been fragmented, very confusing, and unclear for our appropriate participation.

26. DWCC et al. are concerned about a number of issues:
- a. Why is voice being separated out as a concern and deprioritized from text?¹
 - b. Why is voice treated as a “service” while text is not?²
 - c. Direct text needs to replace Text with 9-1-1 as a fallback.
 - d. Even RTT is not a fallback when the wireless coverage for a smartphone user is within low-bandwidth “low bar”, that is why direct Text to 9-1-1 must be a consideration.³
 - e. Deaf senior citizens and Deaf-Blind who are underrepresented with a reliance on TTY for telecommunications are unaware of the sunset of

¹ TRP 2017-182 Footnote 4 - *NG9-1-1 Text Messaging based on RTT will provide an alternative method for requesting emergency assistance when, for example, a voice-based call is not possible, or talking is unsafe for the caller. RTT is an IP-based text messaging service, using the Session Initiation Protocol (SIP) signalling protocol, which enables characters to be sent and received immediately as they are typed, simulating a typical real-time conversation. (footnote4)*

² TRP 2017-182 Footnote 3 - *NG9-1-1 Voice is a service that enables the end-to-end provision of an IP-based 9-1-1 voice call, as defined under the NENA i3 standard. The service is expected, at a minimum, to provide the capabilities and functions of 9-1-1 services in place today, where technically feasible, including functions such as conference calling and calling back the person requesting emergency services following a disconnection. (footnote3)*

³ DWCC et al. has contact with several experts in the United States that can verify this.

TTY and education and awareness needs to be paramount for these as well as the greater Deaf, Deaf-Blind and Hard of hearing Canadian consumers.

- f. The challenge for members of our group is that we are volunteers and we do not have day jobs to attend every TIF meeting that happens in the middle of the day in the middle of the week.
27. Before the deadlines are agreed on, it must be clear that issues around Text with 9-1-1 and RTT are clear and resolved. Text with 9-1-1 must be phased out and replaced with direct Text to 9-1-1 as texting works on low-bar area regions for smartphones where data is unavailable for a full connection using RTT.
28. To explain further, NG-911 Text messaging, our group argues that we need to ensure that there is a fallback option for when the device is in low bar areas, and that 9-1-1 is accessible, as RTT will not work when it is low bar as it runs on data. **Direct text option is a must.**
29. Our consumer groups must be involved in trials of any new accessibility-impacted telecommunications such as RTT. There must be enough time for this in the milestone time-line planning.
30. Equally as important, education and awareness is paramount for our community members. Videos must be completed a year before launch, and webinar series must begin at least six months prior to transition to RTT NG-911.
31. The tasks have kept being deferred and DWCC et. al and their counterparts have once again been left behind. For instance, as indicated on the ESTF0093 TIF, there is still uncertainty about best practices to roll out RTT and how the transition phase will work. The TIF indicated some of the discussion being cut short for the sake of completing the report by the deadline.
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.

Conclusion

33. DWCC et al. does not agree that it is reasonable and appropriate to request the listed reports by the provided dates as COVID-19 safety measures can limit the ability for working groups to achieve deadlines in the usual capacity. DWCC et al place importance on the urgent transition to NG9-1-1, but emphasize it is vital for major working parts to function smoothly. Testing is imperative to ensure its full functionality. It's a matter of life and death for Deaf, Deaf-Blind and Hard of hearing and Speech Impaired Canadians.

34. DWCC et al. maintains if the industry experts are uncertain, they should not be rushed into a decision. We again reiterate our position that while it's important for NG9-1-1 transitioning to begin soon, it is vital to allow the time necessary to iron out the biggest issues because for Canadians without the ability to access 9-1-1, preventing minor issues can become life threatening.

35. 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,

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 2016-116, TNC 2017-33

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