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CANADA
COMMITTEE



COMITÉ POUR LES
SERVICES
SANS FIL DES
SOURDS DU
CANADA

REPLY DOCUMENT

CRTC TNC 2021-102

**Jointly submitted by
Canada Deaf-Blind Collective for VRS
Deaf Wireless Canada Consultative Committee**

**as
CDBC.VRS-DWCC**

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**Canadian Radio-television and
Telecommunications Commission**

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Reply to Intervention Credits

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Land Acknowledgement:

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

TABLE OF CONTENTS

TABLE OF CONTENTS	2
EXECUTIVE SUMMARY	6
Reply to Intervention	8
Communication Equity and Functional equivalence	8
Indigenous Persons	9
CDBC.VRS Contributions	9
CDBC.VRS-DWCC Replies to Interventions	9
QUESTION 1	10
Positive Impact on DDBHH	10
<i>General Comments</i>	10
Enhanced Accessibility Suggestions	10
Current SRV Canada VRS Issues <i>Technical Standards</i>	11
<i>Conference Calls Issues</i>	12
Transfer Issues	13
Privacy Concerns	13
Other Comments	13
Accessibility Concerns	14
<i>Deaf-Blind</i>	14
<i>Indigenous</i>	14
QUESTION 2	16
VRS User Experience Accessibility	16
<i>Lack of ASL and LSQ Videos</i>	16
<i>Deaf-Blind</i>	17
<i>Deaf Interpreters</i>	18
<i>UN CRPD</i>	19
Features	19
<i>Notification Alerts</i>	19
<i>Screen Size</i>	19
Technical Platform Issues	20
Quality of Service	21
<i>Technical</i>	21

<i>Interpreter</i>	22
Outages	23
User Complaint and Feedback Mechanism	24
Separate feedback mechanism for interpreters	24
Account Suspensions	25
Others	26
Security and Third Party issues	26
Recording Calls	28
VRS Announcement	29
Ease of Use	29
QUESTION 3	29
General Comments	30
Quality of Service Standards	30
Standards for Interpreters	30
Indigenous Perspective	31
QUESTION 4	32
9-1-1 VRS Issues	32
<i>General Comments</i>	32
<i>Dial Pad</i>	33
<i>Deaf-Blind</i>	33
<i>Geolocation Detection</i>	34
Lack of use of Deaf Interpreters	34
<i>General Comments</i>	34
<i>Definition of a Deaf Interpreter</i>	34
<i>Purpose of a Deaf Interpreter</i>	35
<i>Hire Deaf Interpreters</i>	36
QUESTION 5	37
Consumer Groups' View	37
<i>IVèS Platform</i>	37
<i>Adequacy of Interpreters</i>	38
<i>Interpreter Training Programs</i>	38
<i>Communication Facilitators</i>	38
CAV and Telecoms' View	39
Competition	39

Other Comments	40
QUESTION 6	41
Indigenous Director	41
Deaf-Blind Director	42
Interpreters - Financial Conflict of Interest	42
Telecommunication Service Providers - Financial Conflict of Interest	42
Telecommunication Service Providers	42
Communication to Stakeholders	43
QUESTION 7	43
Lack of Communication	43
Removal of the TSPs	44
No Position/Change	45
QUESTION 8	46
General Comments	46
Message Relay Service	46
QUESTION 9	47
General Comments	47
<i>Investments</i>	47
<i>Training</i>	48
Budget	49
<i>Amounts</i>	49
<i>No Cap</i>	50
QUESTION 10	50
Retail Internet Service Revenues	50
Other	51
Accessibility Surcharge	51
QUESTION 11	52
Language Barriers	53
Minimum Requirements	53
Deaf-Blind Accessibility	55
Communication Equity	55
National Contribution Fund	56
QUESTION 12	57
General comments	57

Government, Businesses, Institutions	59
VRS caller challenges with third-party issues	59
Other concerns	60
Wider scale promotions broadcast to larger mainstream audiences	61
Social media	61
Proposed ideas for solutions	62
Consumer groups proposed other ideas:	63
Specific Community Awareness	63
Deaf-Blind Awareness	63
Indigenous Awareness	63
TRC Article 92, Business and Reconciliation	64
Reply to Telecoms' Interventions	64
QUESTION 13	66
Reply to Consumer Groups' Interventions	66
Consumer group proposed solutions	67
Reply to CAV & Telecoms' Interventions	68
Recommendations for Public Outreach to Indigenous Communities	70
QUESTION 14 Question 14. When should the Commission next review VRS?	71
Reply to Consumer Groups' Interventions	71
Conclusion	72

EXECUTIVE SUMMARY

ES1: CDBC.VRS-DWCC appreciated all the participating interventions in this proceeding. Our team is very pleased to see that many parties agreed on many of the essential points about the current Canada VRS, and there were a few places where interesting perspectives came into play.

ES2: Multiple parties agreed on the following:

- Improved services and inclusion of Indigenous Deaf, Deaf-Blind, and Hard of Hearing
- Indigenous Director and Deaf-Blind Director on the Administration Board
- Deaf-Blind accessibility must be a consideration
- Deaf Interpreters should be an acceptable addition to communication equity
- Separate interpreter and technical support feedback mechanisms
- Neutral ombudsman-type of resolutions outside of the VRS system

ES3: For the last six years, we have had VRS; while multiple consumer groups have enjoyed life-changing accessibility, functional equivalent telecommunications for communication equity has not yet been achieved. A few parties have commented that a list of features and services need to be implemented in the VRS app before it becomes truly accessible for all VRS users, including Deaf-Blind, to have accessible phone calling experiences.

ES4: Indigenous Deaf Peoples have equal rights to other Canadian Deaf, Deaf-Blind, and Hard of hearing Canadians. It means making every effort to establish internet connectivity where Indigenous Peoples live and not focusing on metropolitan areas. There needs to be a shift.

Access to and use of modern communication services in remote and rural Indigenous DDBHH communities in Canada lags considerably behind that in the rest of Canada because of inadequate supply arrangements and prevalent economic and social conditions.

ES5: Sustainable and trusting relationships must be built with Indigenous DDBHH communities in remote and rural areas throughout Canada. There need to be improvements to programs for better communication services in Indigenous communities. These improvements include additional staff with outreach and tech support duties that focus on providing services to Indigenous in remote areas. Equally important is a representation at the Board level with an Indigenous Director to ensure that Indigenous issues follow through.

ES6: Improvements to support interpreters and callers alike were suggested as follows:

- Separate interpreter and technical support feedback mechanisms
- Neutral ombudsman-type of resolutions outside of the VRS system
- Ongoing training for interpreters with local signs coast to coast
- ASL/LSQ translations of user agreements and policies and policy changes

- implementing awareness and training related to Indigenous, Black, Persons of Colour, 2SLGBTIQA+ topics
- Establishing standards for BOTH interpreting standards and technical standards

ES7: Several technical features needed to be considered:

- Separate platforms, with one being a Deaf-Blind accessible platform
- Technical Platform be re-tendered
- Improvements to features such as notifications and transfer calls to reduce dropped and missed calls, the ability to display VRS on larger devices such as TVs with 1080p capability, OVRSC provided 24 suggestions of upgrades to the VRS capabilities that make the caller experience equal to hearing calling experiences.

ES8: Considerations related to awareness and promotion have included:

- One-on-one support is needed for those who are less technically inclined, such as Indigenous, Deaf-Blind, and seniors
- Education and Outreach to include remote and rural areas
- Education and Awareness shifted to include businesses, institutions and government
- Promotions are broadcast across a wider scale, such as television, radio, and the internet
- Production of more videos showing how-to-use skills, such as how to make a VRS 9-1-1 call, fun to watch dramatizations to benefit not only the ASL/LSQ users but the general hearing population as well

ES9: Other possibilities that were explored by all parties to consider are:

- All parties, including the TSPs, agreed that internet services revenue be contributed to the NCF and the VRS system funding
- Stakeholders and TSPs both have a role to play in assisting with the promotions
- Seven consumer groups want the next VRS review in three years, but the five, including CAV and the TSPs, want it in 5 years.
- CAV suggested the new cap to be \$41 million for the next five years to 2027, CAD-ASC suggested a \$60 million cap, while **CDBC.VRS-DWCC** took CAV's budget and added costs for Deaf-Blind accessibility to \$50 million, except for its proposed Communication Facilitators. The suggested amount is subject to change as more information is gathered.

ES10: Overall, many recommendations were made to assign the CAV more responsibility to ensure enhanced accessibility for all Deaf, Deaf-Blind and Hard of hearing callers and to reduce the stress on the interpreters' work experience. **CDBC.VRS-DWCC** is satisfied with the list of suggestions made by all consumer parties. No one would be left behind, including Indigenous and Deaf-Blind persons, seniors, and interpreters.

Telecom Notice of Consultation CRTC 2021-102 Review of Video Relay Services CDBC.VRS-DWCC's - Reply to Intervention

1. **CDBC.VRS-DWCC** submits its Reply to Interventions for TNC CRTC 2021-102.

Reply to Intervention

2. **CDBC.VRS-DWCC** has acknowledged and read the Canadian Association of the Deaf - Association des Sourds du Canada (**CAD-ASC**), Deaf and Hard of Hearing Coalition (**DHHC**), Canadian Deaf-Blind Collective (**CDBC.VRS**), Canadian Association of Sign Language Interpreters (**CASLI**), Ontario Video Relay Services Committee (**OVRSC**), Canada Deaf Grassroots Movement (**CDGM**), Deaf Wireless Canada Consultative Committee (**DWCC**), and the Canadian Administration of Video Relay Services (**CAV, Inc.**). It also has read the telecommunication companies' responses: Canadian Wireless Telecommunications Association (**CWTA**), **Telus**, **Rogers** and **Bell**.
3. **CDBC.VRS-DWCC** focused on reviewing only twelve interventions, the key players in this proceeding; consumer groups: **CAD-ASC**, **CDBC.VRS**, **CDGM**, **DHH Coalition**, **DWCC**, and **OVRSC**. There is **CAV** and then, on the telecommunication service provider (TSP) side, the following four are **CWTA**, **Telus**, **Rogers**, and **Bell**.
4. This document will reference and quote from all the interventions that all the above participating parties have contributed to the record of TNC CRTC 2021-102.

Disclaimer: the team may quote directly and reference with footnotes but may also paraphrase and use similar wording. Failure to put quotes on exact wording does not mean any intent to copy or duplicate but is simply an oversight resulting from missed places in such an extensive document.

5. Instead of adding footnotes for every quote, we ask that readers please reference all 12 of the parties' intervention document from which the section originates, available online in the public record at CRTC's website for the proceeding TNC CRTC 2021-102.

Communication Equity and Functional equivalence

6. **CDBC.VRS-DWCC** wishes to explore the true definition of communication equity and why it is crucial for the CRTC to note that just having "functional equivalent" telecommunications is insufficient.
7. Communication Equity¹ and Functional Equivalency² are not the same. We no longer want to strive for mere functional equivalency. **We aim for COMMUNICATION EQUITY.**

¹ Communication Services for Deaf - [Chris Soukup Receives Award for Humanitarian Efforts](#)

² Functionally Equivalent Telecommunications - [Position Statement on Functionally Equivalent Telecommunications for Deaf and Hard of Hearing People](#)

8. **Communication Equity** incorporates concepts and plans that involve **all parts** of communities. It must be embedded in community-based media, advocacy, information sharing, and more. Equity-based communications put the community **first**.
9. In the case of DDBHH Canadians who communicate visually, in sign language or tactile sign language, their primary means of communication is done visually – in person or over the internet and wireless channels.³ We want this fact recognized and understood so that when individuals and groups cite **Communication Equity**,⁴ It also follows the concept of GBA+ = Gender-Based Analysis Plus. In other words, to reach the same access as the majority, society must sometimes give 'more' to make this happen.

Indigenous Persons

10. CDBC.VRS-DWCC provides an intended emphasis for CRTC and CAV to be reminded of the steps needed to be made toward the Truth and Reconciliation Commission (TRC) in Canada. We illustrate this point by references made to the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP), Canada's Bill C-15, the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD), and existing federal government or Telecommunication Service Provider (TSP) internet projects, to back up and further support our position where Indigenous persons are mentioned.

CDBC.VRS Contributions

11. The Deaf-Blind team members have greatly appreciated their colleagues in providing input on the CAV, the *SRV Canada VRS* services, and the various stages of presenting information to the CRTC and participants in the CRTC 2021-102 proceeding. The team members thank the other participants for their views and acknowledge every group's contributions.

CDBC.VRS-DWCC Replies to Interventions

12. **CDBC.VRS-DWCC** acknowledges that the telecommunications companies and the CWTA deferred answers to Questions 1 to 4 to the accessibility groups.

³ CAD-ASC - <http://cad.ca/issues-positions/telecommunications/>

⁴ Communication Services for Deaf - [Chris Soukup Receives Award for Humanitarian Efforts](#)

QUESTION 1

Question 1: Describe the impact that the introduction has had for people who communicate using sign language. Has the service improved access to telecommunications services since it was launched?

Positive Impact on DDBHH

General Comments

13. **CAD-ASC, CASLI, CAV, CDBC.VRS, CDGM, DWCC, DHH Coalition, and OVRSC** all described the significant positive impact of the launch of *SRV Canada VRS*, describing a whole new world opened up, creating the independence and empowerment of DDBHH sign language users with telecommunications accessibility connections in Canada. VRS users can use their primary language of ASL or LSQ as recognized by the *Accessible Canada Act*.
14. **CDBC.VRS-DWCC** agrees with all the parties involved, seeing that their comments indicate that VRS has made a difference in the lives of Deaf, Deaf-Blind, and hard of hearing Canadians and creating enhanced connections with their family, friends, employers, and those they interact in their worlds. However, many groups had suggestions and comments for improvements.

Enhanced Accessibility Suggestions

15. **DWCC** felt some issues needed to be addressed and overcome. For example, initially, there was a web based *SRV Canada VRS* program, but due to its browser challenges, it was replaced with applications, and the problem was tentatively removed. However, it still creates a barrier for those who live in remote locations and access the internet through public shared spaces such as libraries, community centres or Indigenous or First Nations band offices. The web-based access to VRS must be revived as an option for public shared spaces and facilities.
16. **CDBC.VRS-DWCC** would appreciate seeing hearing callers within the VRS screen, so we can observe the hearing person's reactions while on the phone and feel we are truly getting the whole phone-calling experience.
17. The **OVRSC** offers interesting information that **CDBC.VRS-DWCC** supports: that the CRTC should take note of and investigate as a potential option "an existing project called *IRIS Accessibility* led by the Rochester Institute of Technology – National Technical Institute for the Deaf." **CDBC.VRS-DWCC** agrees that "CRTC can make this mandatory among the telecommunication providers and companies that provide hardware to ensure their operating system, including those accessibility features."

Current SRV Canada VRS Issues

Technical Standards

18. Several parties, for example, **CAD-ASC**, **DWCC**, **DHHC**, and **OVRSC**, mentioned that the technical support needs to improve and that technical fixes need to be made to the platform. **CDBC.VRS-DWCC** supports this.
19. The consumer groups pointed out gaps in services and aspects of the VRS in Canada where they felt that true functional equivalency or communication equity did not occur. Therefore, the simple establishment of *SRV Canada VRS* is deficient. Some groups pointed out examples of what they mean by this, which are mentioned in the following paragraphs.
20. **OVRSC** firmly believes that “the progress on improving is not sufficient which is basically justified CAV-ACS’ change in their statement of the purpose of the corporation as there are plenty of simple/standard features that would make VRS user experience functionally equivalent basis to hearing users that CAV- ACS still has not implemented in last five years and 8 months.”
21. **OVRSC**’s list of specific features to be functionally equivalent is available at this [link](#).
22. **CDBC.VRS-DWCC** wholeheartedly supports **OVRSC** in this comment that CAV must demonstrate and achieve specific technical configurations in its platform for *SRV Canada VRS* that enables the Deaf VRS user’s call to be the fully functional equivalent to the hearing callers of actual **communication equity** for DDBHH Canadians.
23. In providing more specific examples, the **CDBC.VRS-DWCC** supports the concept that interoperability must be established between other jurisdictions, such as the United States so that callers can contact each other across the border. DDBHH Canadians could call directly to customer services of such establishments as Gallaudet University, Dawn Sign Press, FCC, or even Disneyworld.
24. **CDBC.VRS-DWCC** supports the **CAD-ASC** in that standards need to be set with expectations that are initially outlined in the document where there is a review of the United States ADA Requirements for Effective Communication:⁵
“... **all** of the following specific performance standards must be met:
 - a) real-time, full-motion video and audio over a dedicated high-speed, wide-bandwidth video connection or wireless connection that delivers high-

⁵ ADA Requirements for Effective Communication - [link](#)

⁴ IRIS Accessibility - [link](#)

quality video images that do not produce lags, choppy, blurry, or grainy images, or irregular pauses in communication.

- b) a sharply delineated image that is large enough to display the interpreter's face, arms, hands, and fingers, and the face, arms, hands, and fingers of the person using sign language, regardless of his or her body position.
- c) clear, audible transmission of voices; and adequate staff training to ensure quick set-up and proper operation.”

25. In closing, the **CDBC.VRS-DWCC** supports the **CAD-ASC** statement, “CAV has an opportunity to enhance its technical standards and the quality of *SRV Canada VRS* services and to improve enforceable mechanisms for consumer protection, including a set of rules on data protection, privacy and data portability, as well as accessible mechanisms for consumers to redress their issues and experiences in VRS.”

Conference Calls Issues

26. The pandemic brought communication issues to the forefront, and this created more signals to create opportunities that could innovate further solutions for communication, such as the integration of VRS with the Zoom platform for a functional equivalent conference meeting. The *SRV Canada VRS* platform should be able to integrate with the Zoom application for conference calls to create an equitable phone call-in conference attendance experience.
27. **DWCC** participated in several federal government conference calls and saw its conference calls cut progressively shorter, which was not a positive calling experience. The conference call situation did not provide the Deaf participants with an **equitable communication** experience. In one meeting, our conference calls were cut short from 2 hours to 1.5 hours “for the Deaf participants.” It was embarrassing to be the sole reason for the meetings to be cut short due to CAV’s policy of the 90-minute limit. It is **not** communication equity.
28. The **DWCC** participated with a team of three Deaf callers in a CRTC teleconference for the ESWG meetings with the PSAPs, involving nearly 100 participants. It was very challenging in the call-in phone meeting where each Deaf caller was using *SRV Canada VRS* with a separate and different VRS interpreter to call into the session. This specific example gives rationale to the above, that while we appreciated the policy that two interpreters team up for conference calls for support, it means with three Deaf attending these meetings, the meeting tied up six interpreters for one teleconference.
29. The recommendation is to integrate and embed the VRS Video Interpreter in the Zoom screen with three Deaf people participating in a Zoom call. This arrangement means greater equity in a conference call and **conserves *SRV Canada VRS* resources.**

30. The other challenge was that the **DWCC** members wanted the reading materials emailed to the interpreters for better preparation. So, some consideration needs to be made for this kind of situation. To whom would the agenda, list of terminology, and other prep materials be sent so that the participatory process is seamless for all?
31. **CDBC.VRS-DWCC** supports that CAV needs to adjust its policies and resolve technical barriers about conference calls to conserve *SRV Canada VRS* resources.

Transfer Issues

32. **CASLI** described how the platform does not prioritize a transfer. When it's busy, “callers and interpreters need to wait unnecessarily to have the call transferred to another interpreter resulting in disruption to the flow of the call.”
33. **CDBC.VRS-DWCC** believes it is imperative that the disconnect, re-connect, and transfer issues are immediately addressed to reduce the number of critical missed calls.

Privacy Concerns

34. **CAD-ASC** raises the concern about privacy that “includes the options to resolve the third-party issues such as banks, courts, government offices and credit card companies will often refuse to share passwords, information, and other sensitive data with third parties (i.e. when interpreters are involved). The **CAV** could support these federally regulated entities and the Commission in developing policies and standards that will remove barriers to DDBHH getting access to their information through *SRV Canada VRS* calls.”
35. **CDBC.VRS-DWCC** supports and agrees that the issues around privacy and confidentiality need to be resolved by the *SRV Canada VRS* platform as one of its priorities, along with education and awareness of all these institutions and government departments to become more familiar with the concept of VRS Canada and understand how it works.

Other Comments

36. The **CDGM** and the **DHH Coalition** both stated that they were not satisfied with the accessibility, effectiveness or functionality of the Canada VRS but did not offer specific examples in their answer to Question 1.
37. Additionally, **DWCC** saw third-party issues still outstanding, and these need to be resolved to achieve communication equity, especially with the banks and federal and provincial government department services such as Canada Revenue Agency (CRA) and Health Canada.

38. **CDBC.VRS-DWCC** observes that with the **OVRSC**, **CASLI**, and **DWCC** comments, collectively, it appears that the VRS platform still has a ways to go with upgrades and technical fixes with more research and development enhancements before it can be a genuinely functional equivalent calling experience at par with hearing Canadian callers' telecommunication experiences.

Accessibility Concerns

Deaf-Blind

39. **CDBC.VRS** mentioned that for Deaf-Blind VRS users, functional equivalency and communication equity means having a 16:9 perspective on the screens and the ability to project the interpreter on the smart television by using the casting or mirroring feature of the phone/iPad to the big screen. In addition, there should be the capability to use web cameras with 1080p resolution to project the VRS on larger screens.

40. Moreover, for true Deaf-Blind accessibility, these VRS users need “to be able to receive the incoming notifications for calls, which might mean more accessible options are made possible, such as vibrating means of notifications compatible with the apps and platforms.”

41. **CDBC.VRS** explained that while those with limited vision are currently using the VRS, it is still not truly an equitable calling experience because those who communicate with a tactile means still do not have fully independent phone calling experiences.

42. **CDBC.VRS-DWCC** supports the concept that accessibility would be improved if the current *SRV Canada VRS* was provided with a broader range of access for those with vision loss and those who require a tactile means to receive messages from the interpreter on a screen that they can't see. A means for that is providing Communication Facilitators for these tactile Deaf-Blind persons.

Indigenous

43. **DWCC** recommends that technical assistance be mandated to have Indigenous DDBHH persons be able to access and receive the service they need in public spaces where the internet is available with high quality of service.

44. **CDBC.VRS-DWCC** reminds the CRTC that regarding Indigenous DDBHH persons in Canada, disability and health services are often inaccessible for Indigenous persons, who are often obliged to leave their community and move to bigger towns where they can access support services regularly. However, this relocation often isolates and deprives them of the support of their family and cultural values.

45. For Indigenous DDBHH, social deprivation obstructs opportunities to attain an adequate standard of living and ultimately obstructs access to basic healthcare, disability services and, most applicable, communication when it is only within wifi ranges. Indigenous DDBHH persons must rely on going to shared public spaces to use VRS, as outlined in paragraph 40 above. There must be efforts to ensure that high-speed broadband is in these locations for these Indigenous DDBHH to access clear video connections for access to VRS. Absent cell coverage and slow internet speeds limit our ability to connect with our elders and loved ones.
46. **CAV** must consider the National Broadband program⁶ and funding resources to ensure the high-speed connections are built in the specific places where the Indigenous Deaf person resides. According to the **Telus** project, they assist Indigenous persons “to ensure they can stay safe and connected through their cell phones on the highways.” The project addresses the barriers Indigenous persons face to education, health care and employment, where the Indigenous persons find themselves barred from accessing reliable internet – “isolating us further in this digitally connected world and impeding our progress in unlocking growth, prosperity and innovation in our communities.”⁷ An additional read and reference is “Honouring Tradition through technology.”⁸ This shows precisely the kind of support the Indigenous DDBHH need.
47. Furthermore, the VRS platform's failure to provide options often relates to a lack of understanding of cultural frameworks and community dynamics and a disconnection from the health and rehabilitation needs of Indigenous DDBHH persons. The goal is to remove the barriers and failures by developing safeguards to avoid any action that will diminish or disempower the cultural identity of Indigenous DDBHH persons.
48. We believe **CAV** has to allow further insight into the needs of each community and the resources available to people there, including services and personnel. Individual support needs may include attending to family dynamics, engagement with peers within the community and the workplace, accommodating preference as to location, fulfilling health care needs and assuring cultural safety. Especially in light of the *United Nations Declaration on the Rights of Indigenous Peoples* (UNDRIP).
49. The **UNDRIP** is recognized and adopted by the Government of Canada, along with Bill C-15, which is the Canadian legislation that reinforces the UNDRIP. We emphasize that UNDRIP gives particular attention to Indigenous Deaf Peoples in the implementation of this Declaration as described in:

⁶ High Speed Internet in Canada - [Innovation, Science and Economic Development Canada](#)

⁷ Connected and engaged Indigenous communities are the key to unlocking Canada's full potential - [Telus link](#)

⁸ Honouring Tradition through Technology - [Telus link](#) -

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.**

QUESTION 2

Question 2: 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?

VRS User Experience

Accessibility

Lack of ASL and LSQ Videos

50. **CASLI** provides unique perspectives, highlighting the VRS user experience from the Deaf caller's side and the interpreter's perspective on the other end of the call. **CASLI** members (interpreters) pointed out that the VRS callers “don't know [the user agreement] PLUS they sign up because they need the service, so they accept whatever they can get...”
51. In **CASLI's** view, the CAV has not made available the contract and user agreement when they sign up for VRS and includes “all legal language,” which is not accessible in ASL and LSQ, and this is where the VRS users do not “understand the contract agreement.”
52. **CDBC.VRS-DWCC** wholeheartedly supports the **CASLI's** point here, as accessibility is our group's concern, especially when the *Accessible Canada Act* is in force. Therefore, the user agreement must be translated into ASL and LSQ to enhance the ease of comprehending the information in the user agreement. There need to be words attached with links to ASL and LSQ vocabulary definitions to assist the VRS users in understanding the legal language of the user agreements. These links would go directly to YouTube videos.

Deaf-Blind

53. **CDBC.VRS** explained the current VRS user experience for Deaf-Blind users: "the platform application is challenging for many CDBC.VRS members because of currently limited accessibility features."
54. **CDBC.VRS** said the technical platform and application must be fully accessible for Deaf-Blind users. "With the *SRV Canada VRS* app, many modifications are required to make it fully accessible to those who are Deaf-Blind or low vision users.
55. All the points that the **CAD-ASC** mention are the same as the DWCC and CDBC.VRS mentioned in their interventions, especially where the **CDBC.VRS** says that "many modifications are required to make it fully accessible for those who are Deaf-Blind or low vision users." In particular, the **CDBC.VRS** stated that "the smartphone app is currently not accessible for Deaf-Blind."
56. Additionally, the **CAD-ASC** mentions that Deaf-Blind have difficulty using the VRS service. On smartphones, the screens are too small for Deaf-Blind persons, who prefer larger screens and "recommends...an option on the VRS application to directly connect to the digital television as a "screen-mirroring" from smartphones, tablets, and desktops."
57. As **CDBC.VRS-DWCC** is in full support of Deaf-Blind accessibility, and the **CAD-ASC** comments reinforce a summary of the list of modifications needed to make it easier to use for those who are Deaf-Blind, including:
- a. Modification for colours and more adaptability options in the chat text box, including bold fonts.
 - b. Text settings - add more options for text and background colour schemes, including black background with yellow text and the ability to configure and be compatible with braille device connections.
 - c. Whole application text interface adjustments for Deaf-Blind.
 - d. Accessible 9-1-1 and 9-8-8 buttons in the colours the Deaf-Blind would find accessible. Have options for high contrast (yellow, orange, bright green) yet still be distinctive. Options must appear on all devices, not just desktop computers but smartphone devices.
 - e. Beta testing by Deaf-Blind needs to be conducted to test current features and offer recommendations for full accessibility to a more extensive range of Deaf-Blind VRS users.

58. **CDBC.VRS-DWCC** reminds the **CAV** and the CRTC that Deaf-Blind people deserve full accessibility to VRS, and this includes not only Deaf interpreters but Communication Facilitators (CF), as mentioned in **CDBC.VRS** intervention for those that need tactile sign language communication facilitation.

Deaf Interpreters

59. **CASLI** points out the challenges that interpreters have had, “oftentimes, some Deaf/Hard of Hearing individuals need the services of a DI and oftentimes the interpreters need assistance. These interpreters face resistance and it is “a major concern with the restriction of not being allowed to use Deaf Interpreters (DIs) in video calls [by the CAV].”
60. Furthermore, “the current understanding is that users cannot have DIs because CAV doesn’t recognize the need for it,” and there is fear that the CRTC would disapprove of such a vital resource. However, “working with Deaf Interpreters is considered best practice for effective and clear communication.” These situations are creating barriers to the experience of VRS users.
61. **CASLI** further explains that its “COE (Code of Ethics) demonstrates the appropriate use of Deaf interpreters. The federal government, for example, Multilingual Interpretation and Accessible Communications, already hires Deaf interpreters when needed. **CASLI** suggested that the CRTC must update this restrictive policy and approve the need to access all important resources to provide clear and effective communication, in this case, using a team of Deaf and Hearing interpreters when appropriate.
62. **CDBC.VRS-DWCC**’s viewpoint that the “fear” is happening is ridiculous. Human rights laws and accessibility acts protect and direct government bodies such as the CRTC to ensure full accessibility for Deaf Interpreters to be utilized. **CDBC.VRS-DWCC** supports CASLI, where ASL and LSQ users deserve full accessibility when they use the VRS services, including persons with English or French as a second language and Indigenous and Deaf-Blind persons. The bases for this position are the documents of the *Canadian Charter of Rights and Freedoms*, the *Accessible Canada Act*, and the *UN Convention of Persons with Disabilities*; all cited below.
63. **CDBC.VRS-DWCC** wholeheartedly supports CASLI’s perspectives on Deaf Interpreters, especially concerning the wording in the *Canadian Charter of Rights and Freedoms* as follows:
- a. In Section 14. **Right to an interpreter (i) Need for an interpreter**. In the case of deaf persons, in particular, section 14 must be interpreted in light of the principle of equality in section 15 of the *Charter*. Deaf persons have the right to interpreter assistance that ensures a high degree of linguistic comprehension, and that is

adapted to the person's linguistic needs and competence. The provision of sign language interpretation will usually suffice, but sometimes the services of a "deaf interpreter" may also be required (*Trottier, supra*, at paras. 49-56).⁹

Accessible Canada Act

64. **CDBC.VRS-DWCC's** perspective is that with the *Accessible Canada Act* here, all forms of accessibility are to be provided for Deaf consumers using any federal government services, and this includes Deaf Interpreters provided for the VRS as the VRS is a mandated service provided through the CRTC, which is a government oversight agency.

UN CRPD

65. **CDBC.VRS-DWCC** reminds us that, related to Deaf Interpreters, Canada has ratified and agreed to the *United Nations Convention of Persons with Disabilities (UN CRPD)* and the *Optional Protocol*. The applications to technology communication are specifically found in Article 9 (1).(b), Article 2(e), (f), (g), and (h)¹⁰ and Article 21, paragraphs a-e.¹¹

Features

Notification Alerts

66. **CAD-ASC** described VRS consumers with issues of receiving notifications of incoming calls. "Despite allowing notifications on their devices, it still does not show up. Some users have reported that the platform is incompatible with specific device software.

67. **CDBC.VRS-DWCC** wholeheartedly agrees that the essential notification system for incoming calls needs to be fixed on the existing platform as the lack of notification options impacts the ease of use of the *SRV Canada VRS* services.

Screen Size

68. **CAD-ASC** mentions the difficulty that those that use the VRS application on a smartphone or tablets generate "a small Picture-in-Picture screen of a DDBHH person via smartphones, and the inaccessibility makes the VRS app have less ease to use without 16:9 or 1080p format viewing options for more precise communication.

⁹ Canadian Charter of Rights and Freedoms Need for an interpreter - [link](#)

¹⁰ United Nations Convention of Persons with Disabilities Article 9, item 1b., and items 2 e-h - [Article 9 – Accessibility | United Nations Enable](#)

¹¹ *Ibid.*, Article 21, a-e. [Freedom of expression and opinion, and access to information](#)

69. **CDBC.VRS-DWCC** wholeheartedly supports the **CAD-ASC** for this screen size feature adjustment, especially for Deaf-Blind consumers, which is also beneficial for all VRS callers.

Technical Platform Issues

70. **The DHH Coalition** states the CRTC “must permit the establishment of two competing VRS systems.”

71. **DHH Coalition further directs the CRTC that** “...they must scrap the IVèS platform and put the provision of its technical platform and VRS interpreters back up for tender. The tendering process must change to permit any eligible company to either tender on the technical platform by itself, or on the provision of interpreter services alone, or both, combined as one package.”

72. **CDBC.VRS-DWCC** agrees that there must be a new platform, and re-open the tender opportunity and not strictly limit a company to only provide one or the other as described,, but ensure it is possible to provide both. However, it is equally concerned about ensuring there is Deaf-Blind VRS user accessibility. It supports a different platform for the Deaf-Blind - an accessible technology platform, such as what is made possible by nWise and provided to Global VRS in the United States. Furthermore, it wants to see even greater innovation, inclusivity, and accessibility with more features that see outcomes as communication equity for the ASL and LSQ VRS users, especially the list of accessible features provided by **OVRSC** in their response to Question 1.

Quality of Service

Technical

73. The **DHH Coalition** includes a comment that resonates with everyone's thoughts, referencing the Eviance Report that explored international VRS systems and “identified eight (8) VRS systems using the nWise MMX platform in five (5) countries – Finland, Germany, Sweden, Switzerland, and UK¹². The same report did not identify any VRS systems using IVèS platforms. According to this Eviance Report, **the IVèS platform seems to be unpopular on the international scene.**”
74. The **CAV** chose the most unpopular platform among international VRS providers, which matches the **DWCC’s Community Member #3** comments in its document addressing the CAV RFI Reply to Questions 6-13 (Category 2 - System Structure), where they referenced other VRS providers and learned about the unpopularity of that specific companies’ platform.
75. Unfortunately, as **DHH Coalition** says, “since there is only one VRS in Canada, there is no natural market competition.” DHH Coalition presented further challenges and the quality of service for technical aspects of *SRV Canada VRS* as reported:
- Not being informed ahead of time of upgrades to VRS applications.
 - Finding the upgraded VRS application to be worse than the older version.
 - Some found the upgraded VRS version more problem-riddled than the older version. Conversely, others found the upgraded VRS version to be “smoother” than the older version.
 - One person found their laptop did not permit its VRS application to be upgraded.
 - Another person reported an inability to simultaneously run the upgraded VRS on their laptop and phone. It proved to be a hassle to switch over between the two devices.”
76. **CDBC.VRS-DWCC** sees and supports **DHH Coalition**’s comments that are similar to the experiences our Community Members as consumers had with the problematic older web versions. One of our CMs even remarked how they wished to have the option to access the VRS through internet browsers using Safari and not have to have a workaround with limited options of browsers, disappointed having to use an application instead. Why not have both an application and the internet version of VRS available to empower consumer choice and for greater accessibility options? Therefore, our group challenges the CRTC to look at current opportunities and ensure that application and

¹² “VRS Research - International Comparison” at <https://crtc.gc.ca/eng/publications/reports/vrsrv21.pdf> at pages 123 -133.

internet usage options are available.

77. **CDBC.VRS-DWCC** wonders what prevents the CAV from making such an easy-to-use internet browser VRS option, similar to *Convolink*¹³ and having application options for using VRS in Canada.

Interpreter

78. **DHH Coalition** presented a list of Issues shared by some participants that include:

- VRS interpreters were not preserving/conveying the correct tones in their interpretations. For example, if a DHH consumer angrily gave a message, the interpreter did not use an angry voice as expected so that the hearing party would realize/appreciate the DHH consumer's tone.
- The quality of the VRS interpreter is not up to par.
- Encountering American (instead of regional) Interpreters who use different/unfamiliar restricted signs.
- Frustrations with frequent interpreter switches in the middle of phone conversations, the lengthy wait for a new interpreter, and the short time between the start of a conversation and the interpreter requiring a break with little to no warnings
- Lack of consistent interpreter quality within the interpreter pool.

79. **CDBC.VRS-DWCC** supports **DHH Coalition**'s comments that the interpreters still need more training. Interpreting through a video screen is different from interpreting in person in real life. The lack of facial expressions and tone of the interpreter presents because it is hard to read through a video screen, or the interpreter forgets to emphasize more on their mouth and facial expressions to convey the meaning of emotions through the video screens. Indeed, they need to mirror the caller's tone, i.e. appear angry or frustrated while relaying the message to the video caller.

80. The **CDBC.VRS-DWCC** sees that the **CAD-ASC** does not fully and accurately answer the question or realize that quality of service doesn't necessarily apply to just interpreters but also to technology quality of services. Also, it is interesting that the CAD-ASC's comment does not align with the CASLI's viewpoints below.

81. **CASLI**'s comment, "Decisions are being made by groups who don't have the context or understand the ramifications of their changes and policies."

82. **CDBC.VRS-DWCC** observes that from these comments, the members of the CASLI view CAV as not doing enough to protect their Video interpreters that are members of

¹³ Convolink - No Download Needed - <https://convorelay.com/convolink/>

CASLI. That there need to be educational videos that show Deaf users how to use a VRS interpreter appropriately

83. **CDBC.VRS-DWCC's** response to CASLI's comment above is that it views this as a perfect example of the rationale that there must be a separate complaints department for interpreters, which would be different from the technical support line.
84. Furthermore, **CDBC.VRS-DWCC**, just like the BCVRS Committee did back in the pre-VRS early days, agrees that education and awareness through training and workshops need to be provided to the Deaf community on properly using interpreters.
85. Our highly valued service providers, the key to VRS, are all the interpreters working as Video Interpreters. CAV needs to do a better job of showing the value of the people acting as the conduits to access communication between two people who do not share a common language.
86. **CDBC.VRS-DWCC** believes it is fair that the CAV should make an increased effort to provide awareness to VRS callers with direct instruction on the appropriate and expected code of behaviour to reduce the strain and stress on the Video Interpreters. For example, fun videos with tips could be produced on how to make video calls.

Outages

87. **OVRSC** and **DHH Coalition** made comments on outages. They both recognize that “there are plenty of complaints from the Deaf community about unnecessary outages, which happens more than any telecommunication providers, based on general observations. The reasons for outages are various, but we do not know any details behind the outages besides the time and duration of outages mentioned on CAV-ACS’ website day or week after the outage.”
88. **OVRSC** “recognizes there are multiple outages that were never listed on CAV-ACS’ website. **OVRSC** believes that **CAV-ACS** do have their definition of “outage” and what to mention but also believes lack of full transparency of outages are preventing proper accountability measures to be implemented to ensure the outage would not happen in same circumstances if the outage were in their control.”
89. **CDBC.VRS-DWCC** agrees with DHH Coalition and **OVRSC** that there need to be more detailed updates on these outages and much more than what is currently being reported, informing all the VRS users of these outages.
90. Furthermore, the **CDBC.VRS-DWCC** would like to see reports with such information as:

- 1) What kind of outage?
- 2) How long has it been out?
- 3) How wide is it?

91. **CDBC.VRS-DWCC** wants to ensure service levels service-level agreement (SLA) meet video relay service communications requirements.

92. **CASLI** provided additional comments on outages, “Deaf callers and interpreters deal with the deficiencies in the platform every day - dropped calls, outages, technical problems (audio, video, phone tree numbers).”

93. **CDBC.VRS-DWCC** believes that the people on both ends of the call are impacted by the CAV’s lack of effort in monitoring service quality, both the interpreters and the callers. The root cause is singular, the technical platform. Thus, the CAV must make the platform deficiencies its top examination priority after this public proceeding. Too much is at stake with the 8,000+ VRS customers at this point.

User Complaint and Feedback Mechanism

Separate feedback mechanism for interpreters

94. Most accessibility consumer groups, such as **CDBC.VRS**, **CDGM**, **DHH Coalition** and **DWCC** believe there needs to be a separate mechanism for complaints and user feedback concerning interpreters. They all describe how the complaint and user feedback system needs to be re-designed to separate technical and interpreter issues concerning the interpreters’ professional boundaries. VRS users do not feel comfortable telling general Customer Services about interpreter issues, so many problems go under-reported. Splitting the complaint mechanism would still retain **CRTC**’s original intent regarding establishing a support line as in the following from **CRTC 2014-187**, paragraph 134.

95. As best described in **DWCC**’s intervention, in paragraph 62 (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....”

96. While they describe it elsewhere in their separate interventions, the **CDBC.VRS-DWCC** agrees with the **CDGM** and the **DHH Coalition** about distinct complaint mechanisms for tech and interpreters.

Neutral External Complaint Mechanism

97. The most significant concern for multiple parties (the **CAD-ASC**, **CDBC.VRS**, **DHH Coalition**, **DWCC**, and **OVRSC**) is that when the VRS consumer issues aren't solved, and the callers go outside to attempt to reach the CRTC for resolutions, they are referred back to the CAV to resolve. There needs to be a higher organization outside of the CAV to elevate and get issues resolved. VRS consumers feel they "cannot escalate their complaints to a neutral and external body." There is a consensus among the majority of the consumer groups for this.
98. **OVRSC** commented, "CAV-ACS either dismisses the complaint or accuses the complainant of being troublesome. This (experience) happened to more than a few users and is alarming." Therefore, the bias needs to be removed, and the focus needs to be on resolving issues with the VRS consumers without judgement. A neutral body is required for this.
99. Parties suggest such a neutral body as the Commission, or the CCTS could be possibilities. Or a new but similar ombudsman-like complaint system design as the CCTS. If existing frameworks are to be used, the challenge is now they would need to become language accessible in ASL and LSQ for this to be made possible.
100. Further, **CAD-ASC** recommends that the independent complaint centre be obligated to respond to any complaint within 30 days and provide the CRTC with a copy of that response."
101. **CDBC.VRS-DWCC** supports all these consumer group parties for a better ombudsman-style resolution system for elevating issues outside the CAV.

Account Suspensions

102. No consumer party made comments about any issues related to account suspensions. Of course, DDBHH consumers would not be willing to share information about their accounts being suspended due to embarrassment or shame, but for reporting purposes, at least the basic information with even just simple data: **the total number of suspended accounts** should be revealed, it should be public information.
103. Because there hasn't been any reported information by the CAV, it is challenging for **CDBC.VRS-DWCC** to decide. However, CDBC.VRS-DWCC was alarmed to learn of a misunderstood situation that led to an account suspension, described by **CM#7**:

"One Deaf IBPOC's VRS account was initially banned. This person

immigrated to Canada recently. They used the VRS app but struggled to understand what the VRS interpreter was saying, so they called their white friend for help with doing volunteer DI, but somehow the VRS interpreter assumed that their volunteer DI was in the same room and then reported to CAV, which then blocked the immigrant's VRS account. Another friend intervened with CAV and explained the IBPOC person's situation. CAV was satisfied and then unblocked the account (gender and person references were sanitized from the pasted story/testimonial to avoid identification). It is an inappropriate practice, an immediate account suspension without investigation, that should not have happened. The VRS system should avoid making assumptions.

104. We see this as the perfect example of why the VRS system needs Deaf Interpreters and Communication Facilitators to assist IBPOC, new immigrants, and new Canadians in the language acquisition process upon arriving in Canada. The option to request Deaf Interpreters to help with the calls should be added.
105. Because there haven't been any reported statistics of account suspensions by the CAV, it is challenging to make determinations. However, **CDBC.VRS-DWCC** cautioned that these suspensions are severe, as they could entail human rights issues, which is the potential reason why the CAV refuses to disclose this information.

Others

Security and Third-Party issues

106. **CASLI** comments, "Institutions, such as government, financial, and any services requiring security authentication are mostly deemed fraudulent. This practice is due to a lack of outreach education from CAV and the CRTC. There is no regulation in place requiring any institution to allow VRS calls. It creates insurmountable roadblocks and oppression against VRS users, as it obstructs access." Further, CASLI explains, "if we call Service Canada - they don't use third parties in fear of the Privacy Act, yet the VRS is truly considered a third party because of possible privacy breaches."
107. **CASLI** comments that the CAV "could advocate government and business entities to have voice numbers specifically for making or accepting VRS calls just as they have dedicated TTY lines. This way, front line staff will be appropriately trained not to handle any incoming VRS calls as third-party calls."
108. **CASLI** further comments that "the VRS system could proactively engage in public awareness campaigns to educate government and business entities about VRS'

function and the necessity of not treating incoming VRS calls from DHH consumers as legitimate 'non-third party' calls.”

109. **CASLI** offers that “Canada Video Relay Service is understaffed and unable to organize community outreach. Community members (Deaf, Hard of Hearing, interpreter agencies, and Video interpreters) are not receiving adequate communication and education. Many Deaf callers do not know how to use the technology, nor do they have knowledge or understanding of CAV policies. As a result, Video interpreters are seen as oppressive and appear as a policing agent when adhering to CAV policies and procedures.”
110. They comment, “The ongoing consensus of our members is that they are burnt out. Interpreters need comprehensive support, and this is often found through training. Specialized training is not limited to a typical day-to-day event, but extending further to a medical crisis, VRS settings, emergencies with 9-1-1, would ensure a standard and quality of services by all VRS interpreters.”
111. Even more critical, “CAV needs to be in regular communication with all registered users, instead of placing the onus solely on VI's to disseminate information. Interpreters are the ones who are taking the brunt of the frustration of Deaf callers (issues with the platform, long queues to connect to an interpreter, tech glitches, etc.). This past year has been challenging for everyone - and VI's are on the edge of total burnout.”
112. **CDBC.VRS-DWCC** supports the **CASLI** comments as we would like to be supportive of both sides, the VRS callers and the interpreters, **CDBC.VRS-DWCC** reminds the CRTC and the CAV that according to the UN CRPD Article 9: Accessibility 2.c) 2. c) To provide training for stakeholders on accessibility issues facing persons with disabilities;¹⁴ “indicates that with the *Accessible Canada Act* enshrining the spirit of the Convention, both CRTC and the CAV are reminded that the training and the education and awareness need to be enhanced so that both caller and recipient of VRS calls, will benefit from healthy communication transactions through the medium of video relay services.
113. Again, **CASLI** further comments that “with more training, our members, community and everyone, benefit from this. CASI is prepared to work with CAV to create training for all VRS providers across Canada. However, funding to support this training is needed. If the CRTC could provide that funding, the quality of VRS services for the Deaf community would excel even more.”

¹⁴ UN CRPD Article 9 - Accessibility 2.c) - [link](#)

114. The **CDBC.VRS-DWCC**, elsewhere in each of their interventions, mentioned that funding needs to be provided to boost the education and training for all VRS providers and education training programs, and the CRTC is what needs to make this happen. The quality of VRS service provisions will improve considerably and incrementally with an additional boost of interpreter training funds.

Recording Calls

115. An outstanding issue seems to remain on whether or not there should be an ability to record the video relay calls, **with CASLI saying it is happening**, and goes against the Code of Ethics. However, CASLI says, regardless, it is happening, and the interpreters' trust has been eroded because “the Deaf consumers are NOT told before with each call that their discussions are being recorded.”
116. **CDBC.VRS-DWCC** sees some of the benefits for some situations where evidence is needed, just as **CDGM** states, but agrees that there **must not be abuse** and that policies and procedures must be implemented. There must be an in-depth examination of this issue about the *Privacy Act* and the *Accessible Canada Act*.
117. Further to privacy issues, **CDBC.VRS-DWCC** has additional comments: While CAV states they are not recording calls, it appears the calls are documented in reports in various instances. However, the CASLI is claiming calls are recorded in their intervention. Thus, regardless of CAV stating that “call recording” is not occurring and only call monitoring is happening (as stated in their policies), in addition to what appears to be 3rd party consent which is both a privacy and legal issue, it seems content and behaviour of said content is indeed being documented and retained for years.
118. There must be transparency regarding what is happening in video recordings, and the Commission needs to step in to encourage further clarity and transparency.
119. As per the Sage Report, on page 15,¹⁵ one user speaks of their experience in documented reports and the retention time of the CAV-VRS report. They state:

“The participant wanted more information about the storage and use of information about users, particularly about negative incidents involving the user. They said that from their experience, this sort of information is stored for years, and they have had this mentioned to them by customer service years after an incident. They felt this was inappropriate and that once an incident has been resolved, it should not be brought up again.”

¹⁵ The Sage Report, page 15 - [link](#)

120. **CDBC.VRS-DWCC** questions, did the CAV explain how many years reports are retained? The CAV Privacy policy neglects to mention the documented reports' retention times. Disclose to the person all the 3rd parties that have copies of the reports. Was the person informed of their right to see it, have it corrected and brought to the Privacy Commissioner of Canada should they disagree with anything? Again, we remind that our specific population has literacy disadvantages and language deprivation, so they aren't being fully informed to the level that they can understand. Again, these posted policies have not been translated into ASL or LSQ, putting the VRS users at a disadvantage.

VRS Announcement

121. **The DHH Coalition** pointed out that the system needs improvements to the ease of use of the VRS system. It offers suggestions where consumers have the option to "preselect and store his/her "self-announcement" to be used when the hearing party answers the call" and has the option to allow the consumer to "impromptu self-announce..." (if they wish) "...when the hearing party answers the call."
122. **CDBC.VRS-DWCC** agrees that this functional addition to the system would enhance communication equity for Deaf, Deaf-Blind and Hard of hearing users "to "switch on" self-announcement options for all calls and make it easier on their VRS calls.

Ease of Use

123. **CAD-ASC** and **CASLI** appear to focus their response to this question on the ease of use of the Canada VRS issue, paying particular attention to the callbacks by the interpreters after many DDBHH consumers shared they had never received callbacks when their calls with the video interpreters were disconnected.
124. **CASLI** mentioned issues with the phone transfers and both sides' challenges with transferred calls.
125. **CDBC.VRS-DWCC** is concerned about the phone transfers being dropped, especially when there are transfers and finds these problematic and agrees that these functional technical issues need to be fixed.

QUESTION 3

Question 3: 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?

General Comments

126. A few groups truly understood the words “specific quality of service standards” and commented, and we will examine their responses.

Quality of Service Standards

127. **OVRSC** strongly believes that the Commission must impose specific quality of service standards on the CAV-ACS with more accountability mechanisms as enforcements and more frequent internal reviews to ensure the progress to have VRS [on a] functionally equivalent basis to hearing users.
128. **OVRSC** continues to describe the imposition of the quality of service standards on the CAV-ACS for the following:
- a. Quality of technology such as platform and application design to become more intuitive and minimize the disruptions.
 - b. Upkeep features developed to ensure Canada VRS can function equivalent to hearing users.
129. **CDBC.VRS-DWCC** disagrees with the **CAD-ASC**'s statement that “the Commission does not have to impose specific quality of service standards on the CAV..” because there need to be Quality Standards established for the technical production of clear video communication with metrics followed for video communications. CAV needs to work to follow the service level agreements (SLA) [deleted words] and meet these standards of expectation to reduce the outages and disconnections for the quality of the system.
130. **CDGM** points out elements that need to be met for quality of standards:
- a) Technology aspect of the VRS platform
 - b) VRS app to be compatible on all devices
 - c) Interpreting quality and service
131. It is the **CDBC.VRS-DWCC perspective** that the **CDGM** is partially correct, and yes that quality of service standards needs to be established, but it is not only the interpreting standards but also the technical quality of services that need to be selected for quality of the video so that the communication is not hindered for the ASL and LSQ VRS callers.

Standards for Interpreters

132. **CAD-ASC** and **CASLI** made comments that seem to be limited to the standards for the interpreters, saying that they “encourage the CAV to set up a policy to make sure that interpreters fingerspell and say the numbers slowly and clearly.”

133. **CASLI** further comments that “interpreters need better support, often found through training. Specialized training not limited to a typical day-to-day event, but extending further to the medical, crisis, VRS settings, emergencies with 9-1-1, would ensure a standard and quality of services by all VRS interpreters.”
134. **CDBC.VRS-DWCC** also sees the need to implement standards for frequent training to ensure interpreters are familiar with the range of signs used from coast to coast.
135. **CAD-ASC** added that there needs to be national certification standards, training of local signs and colloquialisms to be implemented, and sensitivity training to address gender identity, anti-racism, and Indigenous cultural issues while also providing acceptable signs (i.e. trans, cisgender, etc.).
136. **CDBC.VRS-DWCC** agrees with the **CAD-ASC** that there need to be standards in place for the training of the interpreters, especially with Indigenous cultural issues and related acceptable signs such as 2-Spirit. Our consumer group agrees with the need to implement standards for a frequent training to ensure interpreters are familiar with the range of different signs used from coast to coast.

Indigenous Perspective

137. The communities of Indigenous DDBHH persons are large but widely dispersed, making delivery of and access to services challenging. Many Indigenous persons who have a disability are not identified as such, so services are not in place, especially in remote areas.
138. From an Indigenous lens, this is not warm and friendly when it comes to a difficult situation where Settlers interfere with the culture and impose western values on Indigenous persons. This is common to see that Indigenous DDBHH generally “lack the support they need to raise their situation.”
139. **Therefore the CDBC.VRS-DWCC recommends that the CRTC and the CAV decrease a prescriptive one-size-fits-all approach to enhancing training for Indigenous DDBHH communities since the situations of Indigenous persons vary from region to region and from coast to coast.**
140. Cultural Safety involves training in cultural sensitivity for non-Indigenous persons and implementing workplace protocols guided by meaningful consultation and participation. For example, community-led employment strategies tend to be more

effective than centralized ones.¹⁶

141. **CDBC.VRS-DWCC** reaffirm that the CRTC and the CAV need to recognize the principles of the UNDRIP - Persons with Disabilities, CRPD,¹⁷ TRCC¹⁸, and International Labour Organization ILO that mandates inclusion of Indigenous persons with disabilities for their rights, increasing equitable access for Indigenous persons with disabilities.
142. In **CDBC.VRS-DWCC**'s view appears that the consumer groups did not quite answer this question. Our team reached out to an industry ally and learned that other factors are genuinely involved in the Quality of Standards. However, due to rules with Reply to Interventions, we cannot add new information from CM#17. The team will instead confer with CRTC to see if it can provide a supplemental intervention response outside of the Reply to Intervention.

QUESTION 4

Reply to Consumer Groups' Interventions

Q4. Have there been any issues accessing 9-1-1 using VRS? If yes, describe the problems and provide suggestions for improving access to 9-1-1.

9-1-1 VRS Issues

General Comments

143. While **CAV** did not disclose publicly the process for the interpreters in 9-1-1, instead filing it in confidence... **DHH Coalition** brings up the suggestion to the VRS system to assign two interpreters to each 911 call, which to our understanding is already a protocol that the CAV practices.
144. **CDBC.VRS-DWCC** stated the standard for the VRS interpreter to remain online until the first responder arrives is critical, acceptable and should be made mandatory practice of the VRS Interpreter (VI).
145. **CDBC.VRS-DWCC** disagrees with CAV's view that the current system is operating in its existing conditions and does not need any changes. Instead it views that the CRTC needs to immediately mandate that the serious app technical deficiencies be

¹⁶ [International Labour Organization - Indigenous Persons with Disabilities, Access to Training and Employment](#), p. 35 - Cultural Safety.

¹⁷ UN CRPD - [Convention on the Rights of Persons with Disabilities \(CRPD\) | United Nations Enable](#)

¹⁸ International Labour Organization - [Indigenous Persons with Disabilities – Access to Training and Employment – Discussion paper](#)

upgraded, especially with regard to emergency calls, on the current platform.

Dial Pad

146. **CAD-ASC** believes that access to emergency 9-1-1 services with VRS should be easily accessible with the fewest clicks possible from the lock screen of their smartphones and **CDBC.VRS-DWCC** fully supports that.
147. To provide an excellent design element for the VRS app regarding 9-1-1 access, **Convo** delivers a lovely “Swipe to take action = after tapping the 9-1-1 button, swipe right to confirm the call.”¹⁹
148. Several parties, such as **CAD-ASC, CDBC.VRS, DHH Coalition, and DWCC** have comments about the technical aspect of dialling 9-1-1 from within the application, where they state the inaccessibility of having to manually dial 9-1-1 on the dial pad from within the app.
 - a. Access to 9-1-1 on the laptop version currently has a 9-1-1 button from within the app, so it is easy to click, and the call is prioritized in an emergency. However, on smartphones and tablets, the same button does not appear on the smartphone app for Canada’s VRS.
 - b. If people aren’t thinking clearly in an emergency, they must have a quick and fast way to connect to the 9-1-1 line. They need to be able to access VRS 9-1-1 through the lock screen of their smartphones in emergencies. The button should be on the lock screen of DDBHH Canadians’ smartphones to click and reach the VRS interpreter in case of emergencies.
 - c. The app must be redesigned to have this 911 “button” easily visible for Deaf or Deaf-Blind persons to find in any emergency, whichever device they use, phone, tablet, laptop with wi-fi or wireless.
149. **CDBC.VRS-DWCC** is in full support of these concepts and in reference to both point a and b., from the lock screen, the joint party suggests the SRV *Canada VRS* icon be the button to click to enter and access 9-1-1 on the VRS app and reach a VRS interpreter immediately.

Deaf-Blind

150. In reference to point c. above, the **CDBC.VRS-DWCC** suggested that there be a different coloured button of 9-1-1 in consideration of Deaf-Blind VRS users. To

¹⁹ Convo Communications US - [link](#)

provide an example, the nWise website has a black button with red fonts but if you hover over it, the font colour changes to white, which is something to be considered for accessibility of all Deaf and Deaf-Blind VRS users.²⁰

Geolocation Detection

151. **CDBC.VRS**, **CDGM**, and **DWCC** each expressed concern about not having automatic location detection, even with internet usage, after some situations, for example, where it happened with a caller in a different province from their account's original location. Time was wasted trying to explain the situation about location changes during the 9-1-1 situation and that should not have to happen.
152. Location detection should not be limited to only wireless but also internet app usage. The app should be able to remain open for this reason alone, location detection. Built-in geolocation should be added to save time with the dispatcher.
153. **DWCC** and **CDGM** expressed concerns about having 9-1-1 access in remote areas such as First Nations reserves, and this is due to the lack of internet or data in their remote area, commenting that often have to drive between 40 minutes to 2 hours to reach a place that has wi-fi or internet available in order to make **VRS** calls or 9-1-1. This needs to be made one of CAV's priorities and mandated by the CRTC.
154. Naturally, the **DWCC** added a point that, while not relevant to this proceeding and is reviewed in separate proceedings, that it would be critical to "have reasonable data for cellphone users to have access to the mobile data to get what the client needs (VRS 9-1-1) when it comes to using VRS from their cell phone."

Lack of use of Deaf Interpreters

General Comments

155. Both the **CAD-ASC** and **CASLI** have mentioned issues with interpreters with the recommendation that Deaf Interpreters should be paired with the interpreters on the calls especially in the case of emergencies.

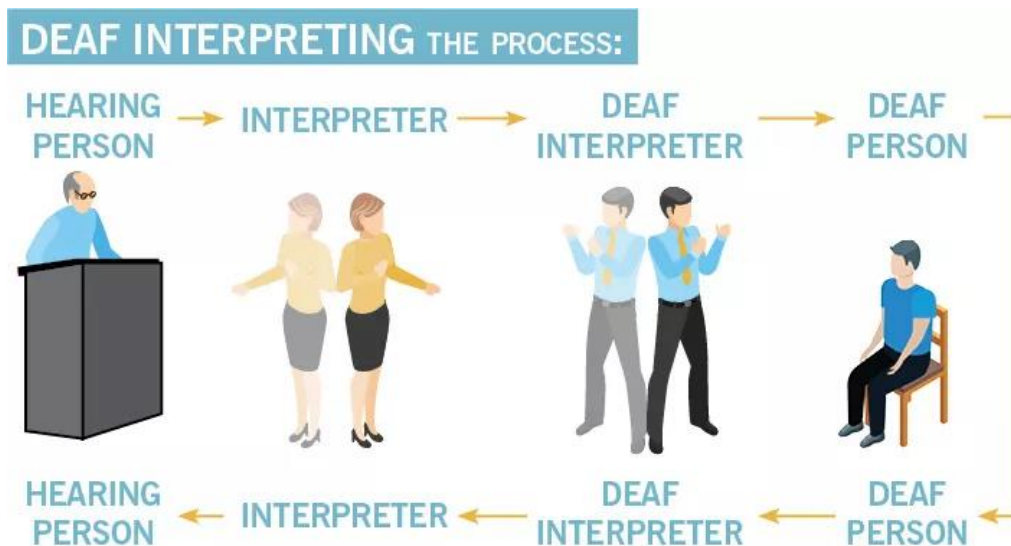
Definition of a Deaf Interpreter

156. An example that befits what **CAD-ASC** and **CASLI** suggest is described with the following paragraph "All of our interpreting teams are composed of an on-screen CDI

²⁰ nWise communication for all - [link](#)

paired with an off-screen hearing interpreter, ensuring communication access for all Deaf and hard of hearing community members. Our interpreters are experienced, certified, and offer communication cohesion, creating equal communication opportunities for all. We believe that the ability to honor a person’s accommodation choice is critical and offer guidance [...] while meeting those needs.”²¹

157. To assist the CRTC in further understanding what a Deaf Interpreter is and does, according to the [link](#), the graphic provides a clear picture of what the Deaf Interpreter process looks like visually²²:



Purpose of a Deaf Interpreter

158. **CDBC.VRS-DWCC** offers a description of what Deaf Interpreter work entails: the service that the Deaf interpreter is a specialist who provides interpreting, translation services in ASL and other visual and communication forms used by individuals who are Deaf, Deaf-Blind and hard of hearing. In many emergencies, using a Deaf Interpreter enables a level of linguistic and cultural bridging that is often not possible when hearing interpreters work alone.
159. **CAD-ASC** adds that Deaf Interpreters are critical to the VRS work in ensuring that immigrants and those who have language deprivation are supported, especially in sensitive situations such as 9-1-1 calls.
160. **CDBC.VRS-DWCC** supports the service of Deaf Interpreters because in case of emergencies, there should not be a struggle to understand the signer, it disrupts the translation process, which in turn affects the quality of translation, and ultimately the

²¹ Emergency Interpreting with Interprettek - [link](#)

²² Greenville Journal - [link](#)

message delivered. More seriously, if it is an emergency, it can have devastating consequences.”

Hire Deaf Interpreters

161. **CAD-ASC** further explains that it “recommends hiring experienced and qualified Deaf Interpreters to train and work in the office alongside VRS interpreters and will be called when required. This assistance will mitigate these emergencies.”
162. The **CDBC.VRS** in their survey analysis report, on page 8, paragraph 14, further describes the process for becoming Deaf Interpreters.
163. **CDBC.VRS-DWCC** supports both the **CAD-ASC** and **CASLI** whereas all believe that **CAV** needs to start approving and allowing experienced and qualified Deaf interpreters to train and work in the call centres alongside the VRS interpreters. It is important to note that CASLI’s “Code of Ethics” clearly explains the appropriate use of Deaf interpreters.
164. The federal government, for example, Multilingual Interpretation and Accessible Communications, already hires Deaf interpreters when needed. A great deal has changed in the use of Deaf interpreters since the CRTC initially ruled not to allow Deaf interpreters to interpret VRS calls.”²³
165. **CDBC.VRS-DWCC** supports the solution that **CASLI** proposes: “CRTC needs to update this restrictive policy and approve the need to access all important resources to provide clear and effective communication, in this case using a team of Deaf and Hearing interpreters when appropriate.”²⁴

²³ and

²⁴ CASLI Intervention for TNC 2021-102

QUESTION 5

Question 5: VRS is currently delivered by the 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?

Consumer Groups' View

166. Some parties did not understand the question correctly, so it was hard to analyze it in relation to the question. This proceeding has been delayed, and with some parties saying they can answer the question later, there is insufficient information for analysis from the consumer groups.
167. **CDBC.VRS-DWCC** observes that the most common comment is on interpreters and the platform not being as innovative to assure total inclusiveness with appropriate features without market competition.
168. One of **DWCC's** Community Members that contributed to its intervention said, "a competitive environment would encourage more innovative and new products."

IVèS Platform

169. **CDBC.VRS-DWCC** extrapolated a standard view among consumer accessibility groups is that the systematic structure does not need to change but that the platform itself with the current provider, IVèS, presents a whole host of issues with a full upgrade of features and quality to true functional equivalent calling experience for VRS callers.
170. It is a common view that the platform provider potentially should be re-tendered to see what other options are available and not to limit it to one sole provider, and if they happen to provide interpreter services, it is still acceptable. And then, there is consideration of a Deaf-Blind accessible VRS platform.

Adequacy of Interpreters

171. **CDBC.VRS** presents the perspective coming from Deaf-Blind people that a competitive model already exists with the number of interpreter agencies available in the community.
172. Such groups as **CAD-ASC**, **CDBC.VRS**, **CDGM**, and **DWCC** are concerned with the inadequate number of interpreters with the growth of the demands for the VRS industry and **CDBC.VRS** said that “there need to be more interpreters available for a fully operational *SRV Canada VRS* with fewer caller line-ups.”

Interpreter Training Programs

173. Additional interpreter training programs or centres could be established with the increased demand for more VI interpreting seats.
174. **CDGM** additionally points out the concern that more interpreter instructors, educators and professional sign language instructors need to be.
175. **CDBC.VRS** wondered if the federal government could help create a 5-year or 10-year limited-time funding boost to increase the number of instructors trained to teach sign language interpreter students in the interpreter education programs, resulting in more students graduating.

Communication Facilitators

176. **CDBC.VRS** would like the CRTC to consider mandating CAV to tender services and training to ensure that Communication Facilitators are available for those who need tactile or accessible communication (close-up signing) while on VRS calls.
177. Similarly, the **DWCC** suggested " creating a funding model to develop Communication Facilitation programs and specialized training for interpreters and agencies to deliver accessible communication to Deaf-Blind consumers." An example is the funding to be provided through service agencies in each province like they do in Washington State.

CAV and Telecoms' View:

178. **CAV**, of course, feels it is sufficient with the current system design with its centralized independent Canadian administrator, with the existing structure as appropriate.

179. **CDBC.VRS-DWCC** disagrees with the CAV, citing its great concern with the interpreter numbers and the lack of innovation and accessibility for the platform.
180. **CWTA** and the telecommunication service providers agree **with the CAV** that these companies are satisfied and that the structure should remain unchanged. **Telus** and **Rogers** offered no comments other than support for the CAV's and CWTA's comments. **Bell** points out that no administration disruption should occur in the current system model that "works well."

Competition

181. **CWTA** and **Bell** both state that, as a result, **CAV** can obtain any advantages of competition between VIPs and points out that CAV contracts with several video interpretation service providers (VIPs) through competitive tendering processes. As a result, it believes that further competition, including a structural change to CAV and the model for providing VRS, is unnecessary.
182. Why is it possible for Telus or Rogers to provide competition with wireless services in the West, while in the East, it is more Rogers and Bell? Competition is healthy in that way. Why can't we apply the same principle to interpreting agencies and call centres?
183. **CWTA** quoted: "**CAV** does not set wage rates. Wages reflect local market conditions, which may vary between locations and service providers. Similarly, the number of [video interpreters (VIs)] utilized varies based on each service provider's operations. It is also important to note that VIs may work full- or part-time."⁵
184. While **CDBC.VRS-DWCC** appreciates the variation of the prices and considers encouraging and healthy recruitment with wages reflecting the local market conditions with location and service provider. They express a concern that the geographical areas deserve more balanced opportunities for service provisions from coast to coast, perhaps increasing competition with call centres in the exact locations.
185. Furthermore, **CDBC.VRS-DWCC** is concerned that CAV seems to favour services in the East rather than the West, as evidenced by how long it took to open up customer service hours in the West.
186. It is **CDBC.VRS-DWCC**'s view and concern that CAV may be stifling the growth and expansion of the only Deaf-owned company in CAV's ecosystem, with their head office in the West. As a group of Deaf and Deaf-Blind, we can only support the growth of the Deaf Ecosystem and wish to see more opportunities for those in our Deaf community.

Other Comments

Surveys

187. **Bell** mentions the annual customer satisfaction survey for the year 2020, with 91% satisfaction. However, **CDBC.VRS-DWCC** finds that the questions used in these surveys are skewed and biased in favour of the CAV. Also, using hearing interpreters for the survey questions is questionable. It should have been Deaf signers or translators.
188. The Deaf community appreciates it when survey responses are authentic and transparent. **CDBC.VRS-DWCC** appreciates when there is a skewness or symmetry in the distribution of responses. Therefore, CAV's survey results are more described as a measure of lack of balance.

UN CRPD

189. **CDBC.VRS-DWCC** gently reminds the CRTC and the CAV of the UN Convention of Persons with Disabilities (UNCRPD):

Article 9, paragraph "1. e) To take all appropriate measures to eliminate discrimination on the basis of disability by any person, organization or private enterprise;"²⁵ as this should not be happening, in light of the *Accessible Canada Act*, which enshrines the principle of the UNCRPD, with Canada acceding the Optional Protocol on December 3, 2018²⁶. Thus, our joint group strongly supports the reference and applications to existing legislation using the international human rights framework.

190. **CDBC.VRS-DWCC** would like to reference the UN Office of Human Rights in application to the wording in the previous paragraph, "7. Disabled persons have the right to economic and social security and a decent level of living. According to their capabilities, they have the right to secure and retain employment or to engage in a useful, productive and remunerative occupation and to join trade unions."²⁷ The collaborative group is concerned about communication access affecting other rights.
191. In closing, **CDBC.VRS-DWCC** references the UNCRPD in Article 9, paragraph, concerning economic, social and cultural rights, each State Party undertakes to take measures to the maximum of its available resources and, where needed, within the framework of international cooperation, to achieve the full realization of these rights

²⁵ UNCRPD Article 9 paragraph 1e - [link](#)

²⁶ Canada accedes to the Optional Protocol to the United Nations - [link](#)

²⁷ OHCHR Article 7 - [link](#)

progressively, without prejudice to those obligations contained in the present Convention that are immediately applicable according to international law.” and this applies to the socio-economic fabric of our Canadian Deaf ecosystem.

QUESTION 6

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

192. The **CAD-ASC, CDBC.VRS, CDGM and DWCC** think the current structure of its Board and mandates need to be updated to include one Deaf Indigenous Director and one Deaf-Blind (or Deaf Disabled) Director.
193. **CDBC.VRS, CDGM, and DWCC** make no further comments about the rest of the makeup of the board structure, while the **CAD-ASC, DHH Coalition** and the **OVRSC** offer comments on the rest of the board positions.
194. **CDBC.VRS** recommends two changes to the Board of Directors structure directly resulting from the *Accessible Canada Act* that there be 1 Indigenous Director and 1 Deaf-Blind Director since these communities currently lack complete access to *SRV Canada VRS*.

Indigenous Director

195. **CAD-ASC, CDBC.VRS, CDGM, and DWCC** all state that the third DHH Director position is converted to a representative from the Indigenous Deaf Community.
196. This board member would represent the Indigenous Sign Language (ISL), which the *Accessible Canada Act* recognizes, especially with the UNDRIP guiding principles under community sections 21 and 22. In light of this and the spirit of TRC²⁸, it is appropriate that the third Director be the Indigenous DHH Director. This also ensures a diversity of voices are heard, including those from marginalized communities.
197. **CDBC.VRS-DWCC** wholeheartedly supports that the third DHH Director position is designated for an Indigenous Deaf person, and this person is elected from Indigenous stakeholder groups.

²⁸ Truth and Reconciliation Commission - [Reports - NCTR](#)

Deaf-Blind Director

198. **CAD-ASC, CDBC.VRS, CDGM and DWCC** all believe that the CAV board should have a Deaf-Blind Director, with the **CAD-ASC** suggesting the wording to be Deaf Disabled as an option.
199. **CDBC.VRS** wholeheartedly supports a policy change to include Deaf-Blind Director participation and consultation to represent the views and needs of the VRS users that are Deaf-Blind. Thus, the CAV Board must be restructured to expand from three DHH Directors to four DDBHH, one of them being a Deaf-Blind Director. This position to be elected from the Deaf-Blind stakeholder groups.

Interpreters - Financial Conflict of Interest

200. The **DHH Coalition** understands and appreciates why the interpreter representatives on the CAV board do not have voting powers due to perceived financial conflict of interest as they could advocate for higher interpreter wages which would drive up CAV's financial obligation."
201. **CDBC.VRS-DWCC** fully supports that the interpreter representatives on the Board should not have any voting powers.

Telecommunication Service Providers - Financial Conflict of Interest

202. **DHH Coalition** believes the Telecom representatives could be in a financial conflict of interest as they may find it in their best financial interest to advocate for lower CAV's budget to lessen their indirect financial obligation to CAV through their financial contributions to the National Contribution Fund.
203. **OVRSC** disagrees with the current Board structure and its mandate, thinking it is restrictive and perceived as "bias-controlled" by the TSP Directors.
204. **CDBC.VRS-DWCC** is concerned that the TSPs can impede or hinder improving *SRV Canada VRS* accessibility innovation-driven financial decision-making.

Telecommunication Service Providers

205. **CWTA, TELUS, BELL and ROGERS** concur with the CAV that their current mandate is appropriate and should not be changed and that CAV is currently operating well and any change to its mandate is unnecessary. Additionally, they thought that changing the structure of the Board would not be beneficial or added value.

206. **CDBC.VRS-DWCC** disagrees as there needs to be a better representation of the Deaf Community with the DDBHH Directors, an Indigenous Director and the Deaf-Blind Director board members. The CRTC is now tasked with figuring out the board's balance to be odd-numbered for voting purposes.

Communication to Stakeholders

207. **CDBC.VRS-DWCC** agrees with the **OVRSC** that there should be better communication and engagement with the stakeholder groups when it is time for elections.

QUESTION 7

Question 7: 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.

Deaf-Blind Accessibility

208. **CDBC.VRS** said that the documents sent to stakeholder groups for the election processes need to be made 100% accessible to Deaf-Blind stakeholder groups to participate. All materials will be distributed in WORD document format, enabling screen readers to convert the text into refreshable braille displays or speech computer programs.
209. **CDBC.VRS** also said that the CAV might need to go an extra step to assist the Deaf-Blind stakeholder groups in creating a standard and fully accessible internal elections system in collecting the votes from its members and helping the Deaf-Blind stakeholder groups in submitting its election choice to the CAV.
210. **CDBC.VRS-DWCC** supports any changes to the election process to make it 100% accessible to Deaf-Blind stakeholder groups.

Lack of Communication

211. **CAD-ASC, CDBC.VRS, DWCC** and **CDGM** would like to have an opportunity to vote for the ASL and LSQ Directors and hopes the voting process will expand to include Deaf Indigenous and Deaf-Blind Directors.
212. **OVRSC** believes that selecting the Directors requires improvement as currently, the

CAV is not electing the three members of the Board of Directors: one ASL Director, one LSQ Director, and one joint ASL-LSQ Director through its registered users. They feel that CAV is burdening volunteer or non-profit organizations to keep up with electing the three DHH Directors when they're not active year-round, thus feeling their votes are being dismissed.

213. **CDGM** is concerned about an election of the new ASL and LSQ Directors and felt the DDBHH community was unaware of an upcoming election.
214. **DWCC** felt there was a lack of transparency from the Board and that they needed to give periodic announcements to notify customers of what was happening.
215. **CDBC.VRS-DWCC** affirms there needs to be an improvement in communication to the stakeholders and the Deaf community when elections are underway.
216. **CAD-ASC, CDBC.VRS, DWCC** and **CDGM** would like to have an opportunity to vote for the ASL and LSQ Directors and hopes the voting process will expand to include Deaf Indigenous and Deaf-Blind Directors.
217. The **CDBC.VRS-DWCC** supports the opportunity for the Board to expand to include Indigenous Directors, converted from the ASL-LSQ Director position, in adaptation to the *Accessible Canada Act*. Additionally, the collaborative group strongly supports creating a Deaf-Blind Director position.

Removal of the TSPs

218. **OVRSC** also believes that there should not be any TSP Directors on the Board as their influence as TSP stakeholders with a profit margin goal for their companies could be perceived as influencing or interfering with the needs of VRS users, the VRS service industry, and the necessary upgrades in providing users high-quality communication access. In addition, they thought the TSPs Directors do not personally use *SRV Canada VRS*, hence are protecting their financial interests over DDBHH's rights to communication access.
219. From **DWCC's** point of view, it would be nice to see more diversity and inclusion as we need more IBPOC DDBHH on the Board of Directors. They think we need to add a minimum of one more DDBHH Director and want the TSPs removed from the Board to best represent the DDBHH community.
220. **DHH Coalition** currently has no position regarding how the DHH representatives are elected but reserves the right to modify its answer later.

221. **CDBC.VRS-DWCC** finds it challenging to analyze when some parties do not answer the questions fully. There is no next Reply phase concerning the **DHH Coalition** comment about modifying its answer at a later date.

Reply to CAV and Telecoms' Interventions

No Position/Change

222. **CAV** thought that the current Board structure and its mandate are appropriate and functioning effectively and should not be changed. They argued that “the current structure and mandate was developed by incorporating feedback received during an extensive consultation process” and noted the Commission’s statement that “this board structure will result in an inclusive and effective Board of Directors.” In addition, the CAV stated that “the Board has worked collaboratively and relied on the expertise of its DHH Board members for their personal experiences with *SRV Canada VRS*.”
223. **CWTA** thought the current CAV Board structure appropriately balances the needs of stakeholders to provide a high-quality *SRV Canada VRS* service efficiently. In addition, they believed that the design and structure is a multi-tier decision-making process that responds to the interests of CAV stakeholders.
224. **Bell** thought that no changes to the Board were required, which seemingly means they thought the selection of the Board of Directors did not need any improvement.
225. **Telus** thought that no changes to the Board were required, which seemingly means they thought the selection of the Board of Directors did not need any improvement.
226. **Rogers** did not see any rationale in changing the CAV Board, which seemingly means that they thought the selection of the Board of Directors required no improvement and that any changes would not add any additional value.
227. **CDBC.VRS-DWCC** strongly disagrees with the **CAV, CWTA, Bell, Telus,** and **Rogers** that selecting Directors does not require improvement. While there may have been an extensive consultation process in ensuring an “inclusive and effective Board of Directors,” two communities had been marginalized from this process: Indigenous DHH and Deaf-Blind communities. Thus, the CAV Board is not yet diverse and effective until these communities are represented to ensure the views of their communities are heard.

QUESTION 8

Question 8 Is there a rationale for expanding the CAV's mandate to give it the flexibility to administer developing and future message relaying technologies?

General Comments

228. **CDBC.VRS-DWCC** observes that not all the consumer groups answered Question 8. Upon reviewing the parties' answers, it seems they didn't quite understand the question correctly. The CRTC could have clarified what it meant about "future message relaying technologies" by providing examples that Deaf community members are more familiar with in brackets such as "(TTY Relay, IP Relay, Captioned telephone relay services and video remote interpreting)." to add clarity.
229. **CDBC.VRS-DWCC** found it challenging to analyze the answers to this question. It did not help that some parties commented they could "answer the question at a later date," meaning there is insufficient information for analysis from the consumer groups in this reply phase.
230. **CDBC.VRS-DWCC** notes that only two consumer groups, as well as **CAV**, answer this question, so it will present what these three contributed to it separately and respond accordingly.

Message Relay Service

231. **CDBC.VRS, DWCC, and the CAV** all shared the perspective that the CAV should be kept within its [mandate] scope to focus on video relay services and the text message relay industry to be kept separate. Generally, they further explained the two systems have too many different "working parts"; therefore, the CRTC needs to keep the two systems separate.
232. **CDBC.VRS** and **DWCC** didn't want to go out of scope, so while they offered few comments or perspectives, they desired to save the rest of the response for another separate proceeding. The two statements made by both groups are below:
- Both **CDBC.VRS** and **DWCC** did suggest an independent administrative body with oversight of the text message relay services system.
 - CDBC.VRS** left the last comment that Deaf-Blind must be required to be included in beta testing and advisory roles when adjusting the current VRS platform to be accessible for the Deaf-Blind VRS users.
233. **CAV** had a neutral response as they would comply only with future Commission

directions if any.

234. **CWTA, Telus, Rogers, and Bell** commented just as the **CAV and CDBC.VRS** and **DWCC** did, that the topic did not belong in this proceeding, and it should be in a separate and independent proceeding and that the Commission clearly stated that message relay services were outside the scope of this proceeding.
235. **CDBC.VRS-DWCC** agrees that message relay technologies must be kept separate from video relay technologies. Currently, they are two separate systems with different technologies. Thus, they need to be kept separate.

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?

General Comments

236. **CDBC.VRS-DWCC** reviewed and saw a few different perspectives among all parties for the proceeding regarding funding for the CAV to provide the *SRV Canada VRS* service.
237. **CDBC.VRS-DWCC** appreciates the Commission's initial cap of \$30 million but acknowledges that the number of users would increase; therefore, the budget number would need to be raised as demand grows. Additionally, the joint groups observed that the total of \$30 million was only requested in the most recent budget filing request.

Investments

238. **CAD-ASC** appreciates the Commission for the initial funding of \$30 million from the NCF to fund *SRV Canada VRS*. However, they recognize that the current funding model requires more financial growth to invest in research and development. This high cost needs to be allocated on top of the already established funding model.
239. **CAD-ASC** has recommended that the funding be increased to \$60 million annually from the NCF. Their reasoning for expanding the CAV's budget includes 13 items.
240. **OVRSC** outlined a long list of features that need to be implemented into the VRS application: **CDBC.VRS-DWCC** believes that the budget must be increased to ensure true communication equity until all of these points are achieved.

241. **CDBC.VRS-DWCC** agrees with the CAD-ASC and OVRSC on its generic list of what should be included in the future annual Canada VRS budget, but we would like to emphasize that the budget must be sufficient to also allow for Deaf-Blind accessibility. The Deaf-Blind accessibility is split into three services:
- 1) Deaf-Blind platform
 - 2) Communication Facilitator services and
 - 3) National Deaf-Blind Telecommunications Equipment Assistance Program
242. The Communication Facilitator model would allow funding to 6+ provincial service agencies to provide CFs with tactile or close-up signing when they make calls using VRS. All of the Deaf-Blind accessibility will be a significant addition to the VRS budget starting in 2023. More information is provided in CDBC.VRS-DWCC's Document 9 in Comment to CAV's Answer to CRTC's RFI.
243. In addition to Deaf-Blind accessibility, **Indigenous Deaf Peoples** must be reassured they will be included in the future VRS policy with VRS service provision.
244. **CDBC.VRS-DWCC** disagrees with **Rogers** that there has been an "orderly development of an innovative and efficient VRS for Canadians." DDBHH Canadians feel that they have been struggling with the current platform and that serious deficiencies need to be addressed before it is considered fully at par with those trying to utilize telecommunications.

Training

245. **CASLI** did not offer comments on the budget but provided that it is prepared to work with the CAV on the training aspects and wants assurance that there is funding made possible to support this training if needed, requesting the CRTC direct a provision of the budget that has funding to assist in enhancing the quality of VRS services for the VRS consumers.
246. **CDBC.VRS-DWCC** provided two interventions that indicate support for funding that assists in the expansion of the interpreter pool, so it is in support of CASLI's presentation of such funding. This funding also includes enhanced training for IBPOC and diversity and initiatives that encourage expanding a diverse range of interpreters with gender identities and ongoing and repeated training for regional sign language dialects.

Budget

Amounts

247. **CAD-ASC** was the only group besides the CAV that presented a dollar amount suggestion for the mandated cap of the new and updated VRS policy. They suggest \$60 million annually, without providing too many specific details, “recommends increasing the funding to \$60 million annually from the NCF because, as indicated in the CAV’s 2020 Annual report, the number of calls has increased to 100,000. Since their first year in 2017.”²⁹
248. **CAV** presented a rationale for a \$41 million ceiling projected to be sufficient for the next few years to the end of 2027.
249. **CDBC.VRS-DWCC** supports this but has a two-pronged comment. With the cost of \$41 million, our group will support, but it has questions or comments:
- a. Does this include Indigenous communities with Deaf members in remote locations and Deaf-Blind accessibility?
 - b. Considering that this proposed increased cap potentially does not include Deaf-Blind accessibility, the collaborative group will provide further suggestions to add amounts to this \$41 million with added costs in light of the Deaf-Blind VRS platform and Deaf-Blind accessibility.
250. **CDBC.VRS- DWCC** proposes that the CAV’s budget be increased to \$50 million cap. This increase would allow for:
- a. more significant investments into a better-quality platform
 - b. increase access to ASL and LSQ and
 - c. enhance VRS accessibility to Deaf-Blind and Indigenous users
251. **CDBC.VRS-DWCC** would like to refer to its response to this portion of the document regarding the budget for the Deaf-Blind accessible technical platform to our supplementary **Document 9**. It provides further details.
252. In contrast, **CDBC.VRS-DWCC** sees that the telecommunication service providers **Bell, Telus, Rogers**, and the **CWTA** have a starkly different perspective from the CAVs or the consumer groups’ views. Collectively, they all state there is no need to increase the cap and need it to be retained at a \$30 million annual cap. Their responses are not surprising, considering from the company’s perspective that they would not want to see the cap increased as it affects their budgets.

²⁹ Access is Opportunity, Canadian Administrator of Video Relay Service ([CAV Annual Report \(Year 2020\), Page 11](#))

253. **CDBC.VRS-DWCC** disagrees with keeping the \$30 million annual cap, as it doesn't account for user number growth nor Deaf-Blind accessibility to VRS.

No Cap

254. The other groups, **OVRSC**, **CDGM**, **DHH Coalition**, said “no cap,” which means making this budget with an “unlimited ceiling.” While the **CDGM** added that the VRS services need to “properly improve and expand to serve all sign language users (including but not limited to members of the Deaf, hard of hearing, speech impaired, Deaf-Blind and Deaf Indigenous communities)” as a rationale for expanding the current \$30 million cap, it did not give more specific information.

255. **CDBC.VRS-DWCC** disagrees with the three groups because it views that it would be irresponsible and challenging to manage fiscal accountability if there is no cap mandated.

256. It is the perspective of **CDBC.VRS-DWCC** that the CRTC, at minimum, needs to mandate a cap that is inclusive of Deaf-Blind accessibility **and** ensure that services are provided to Indigenous Deaf consumers. Potential options include a, an accessible Deaf-Blind platform, Deaf-Blind Accessible Equipment Program, technical one-to-one support service for senior citizens, Deaf-Blind, Indigenous and others with technical needs, additional boards, and advanced upgrades to the current platforms to achieve real communication equity.

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.

Retail Internet Service Revenues

257. **CDBC.VRS**, **CDGM**, **DHH Coalition**, **DWCC**, and the **OVRSC** all had the perspective that retail Internet service revenues should be considered contribution-eligible revenues, all for various reasons:
- a. *SRV Canada VRS* is heavily dependent on the use of the Internet
 - b. There are internet tools where people remove landlines and cell phone minutes, using internet data-based communication tools such as Microsoft Teams, Skype, Zoom, live chat, and other programs.
 - c. Phone calls can take place over the Internet, as in VOIP calls.

Other

258. **CAV** stated the Commission has already defined contribution-eligible revenues via the National Contribution Fund (NCF), where they have recognized the Commission's rationale and have nothing further to add on its determination on this topic.
259. **CWTA, TELUS, and Bell** all believe that it should be necessary for CAV to seek Commission-approval to implement a structure change. The Commission should approve approvals that will introduce efficiencies and cost savings. All felt that it is currently appropriate to include retail Internet service revenues as contribution-eligible revenues for funding *SRV Canada VRS*.
260. Ultimately, the **CDBC.VRS-DWCC** entirely supports all the consumer groups and **CWTA, Telus and Bell's** position that since retail Internet and texting services are now included in the formula for calculating contributions to the NCF, it is appropriate for it to be considered contribution-eligible revenues for funding *SRV Canada VRS*.

Accessibility Surcharge

261. **CDBC.VRS** thinks retail Internet service revenues would create additional funding to ensure full telecommunication accessibility for all DDBHH users. This revenue addition to the "pot of funds" would enhance telecommunications accessibility for Deaf-Blind users.
262. **CDBC.VRS** wonders about the possibility of having customer contributions for accessibility-related telecommunications costs. For example, in the United States, there is a universal customer-contributed fee derived from all telephone, wireless, and internet bills specifically to support a broad range of accessibility needs. This arrangement would remove the TSPs from the financial equation.
263. **DWCC** thought that funds received from people's phone and Internet bills would expand funding for accessibility-related needs, including Indigenous users in remote areas and Deaf-Blind users. Furthermore, it would lead to lower-income equipment programs that support DDBHH.
264. **DWCC** also wants the TSPs to have a "hands-off" approach where the funding comes directly from surcharges on bills of people who pay Internet or wireless.
265. **CDBC.VRS-DWCC** thinks that having "accessibility surcharges" would provide DDBHH greater autonomy and ownership in the decision-making of *SRV Canada VRS*. The TSPs would not have vested financial interests, allowing for more

significant innovation in the Canadian VRS industry. Furthermore, it would enhance telecommunications accessibility for Indigenous, Deaf-Blind, and DDBHH 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?

Language Barriers

266. **CDGM** and **DHH Coalition** thought that filing the annual budget applications in English and French poses language barriers to DHH consumers, the individuals that *SRV Canada VRS* services. The groups feel this process must be modified by adding ASL and LSQ videos in English and French. It would help the VRS users understand what is included in CAV's budget for expected service outcomes such as expenses. Additionally, more explicit information would allow groups to provide a more fulsome impression or recommendations regarding the budget applications in question.
267. **CDBC.VRS-DWCC** wholeheartedly supports that there must be ASL and LSQ videos accompanying English and French for the annual budget application. The Accessible Canada Act (ACA) recognizes ASL, LSQ and ISLs as the primary languages of Deaf people in Canada. Therefore, CAV must provide such information in the appropriate languages for Deaf people in Canada.

Minimum Requirements

268. **CDBC.VRS** thinks that another minimum requirement to be added is having the geolocation enabled regardless of the device used for Canada's VRS system.
269. **OVRSC** believes the minimum requirements are appropriate and encourages accountability of the CAV and its decision, past and present. They also thought that since *SRV Canada VRS* launched, the minimum standards should already be established efficiently and that there is a great need for consistency and continual improvement.
270. **DWCC** strongly requests that CAV's main priority be ensuring *SRV Canada VRS* has a high-quality platform and that the minimum requirements be updated to reflect this. The current platform, IVèS, is problematic, and they have identified the poor choice of platform was due to a lack of minimum requirements for it.
271. **CDGM** thought the current requirements were appropriate and that the CAV has met them all but still needs to improve on the glitches with the platform.
272. **CDGM** said *SRV Canada VRS* users in Western Canada cannot access 9050 Customer/Technical support after 3 pm PST due to CAV's established hours. This conflicts with many users' work schedules. Thus, the hours need to be expanded to meet the needs of Western users. Additionally, users are unable to call 9050 on the weekends.

273. **CAV** said it grew a Canadian ecosystem by ensuring its VTTP and all its VIPs are Canadian business enterprises. Its suppliers' critical administrative and "back-office systems" and infrastructure are located in Canada and staffed with Canadian talent. They worked closely with its Canadian VIPs to increase its supply of interpreters in Canada. As of January 2022, all VRS interpreting is being done in Canada.
274. **CAV** claims the minimum requirements for the CAV and *SRV Canada VRS* set by the Commission remain appropriate and has met all of its minimum requirements as VRS administrator. However, they propose some adaptations to reflect the evolving circumstances and marketplace conditions.
275. Thus, **CAV** has requested the supplier contract duration restrictions for a maximum of four years that the Commission had established in TRP 2014-187 for contracts entered by CAV with its VTTP and its VIPs to be removed. Their rationale is that it poses substantial operational and service management challenges as it oversees the development of *SRV Canada VRS*. In addition, they felt that the contraction duration restrictions are unnecessary to achieve CAV's mandate or meet the Commission's objectives.
276. **CAV** said that since the launch of *SRV Canada VRS*, it had invested significant time and expense into improving the design and performance of platform components. Examples are reducing downtime, introducing native Mac and PC user apps, and system changes as part of CAV's response to the COVID-19 pandemic.
277. **CWTA** thought that CAV's submission of an annual application for the release of funds remains appropriate and is a suitable mechanism for all stakeholders to identify any concerns in a timely fashion.
278. **Bell** thought that CAV's minimum requirements for releasing funds, including an annual budget application, remain appropriate to ensure that CAV continues to meet required standards and provide high-quality VRS services. They also thought that the minimum requirements and annual application also served as a monitoring function and allowed for any issues or concerns to be identified promptly.
279. **TELUS** agreed with **CWTA**'s position that CAV's submission of an annual application for the release of funds remains appropriate and is a suitable mechanism for all stakeholders to identify any concerns in a timely fashion.
280. **CDBC.VRS-DWCC** applauds CAV for the growth of the Canadian ecosystem in *SRV Canada VRS* and thinks that while CAV has made great strides in meeting the minimum requirements of *SRV Canada VRS*, there is still a lot more work for CAV to

do. They need to replace the poorly performing IVèS platform with a better-quality platform. Deaf-Blind Accessibility and Communication Equity are also two other areas of concern. The following two sections discuss these in more depth.

Deaf-Blind Accessibility

281. **CDBC.VRS** says that there need to be different designed video communication platforms, so the customer can choose which app fits their needs, including for Deaf-Blind users. They did their research and found one platform provided by nWise that developed the *MMX db* platform, which would be accessible to Deaf-Blind users and has braille capacities.
282. **CDBC.VRS** says the 9-1-1 aspect of the VRS platform must be more accessible for Deaf-Blind users, i.e., more colour contrast, such as a black button with bright yellow or orange 9-1-1 text. This button needs to be viewable on both the wireless and computer applications.
283. **CDBC.VRS** says the website, especially the parts with technical instructions, needs to be more accessible for many audiences, including Deaf-Blind users. This suggestion means ensuring word or text documents are parallely posted with the PDF files.
284. With the adoption of the *Accessible Canada Act (ACA)* three years ago, **CDBC.VRS-DWCC** stresses the importance of CAV to increase the accessibility of SRV Canada VRS for Deaf-Blind users.

Communication Equity

285. **CDBC.VRS** says that additional equipment, including the Blynclight³⁰, provided by the CAV must be made available at no extra cost, especially for low-income people. Many DDBHH Canadians have limited and fixed incomes and need the appropriate technology for communication equity.
286. **CDBC.VRS** referred to the minimum requirements (item 29) when billing customers. When a hearing person calls a Deaf or Deaf-Blind person's phone/text number and it is automatically forwarded to their VRS phone number for accessibility, there should be no charge because it is an accessibility feature.
287. **CDBC.VRS** is concerned about *SRV Canada VRS* not having a monitored and administered platform, a single (shared) VRS technology platform with tethered interoperability for choice and accessibility. Deaf-Blind users would like to see

³⁰ Blynclight from [Embrava website](#) From [Amazon](#)

interoperability of a Deaf-Blind platform with the general one.

288. Deaf-Blind Canadians would like to be able to call their Deaf-Blind friends in the States, and therefore CAV needs to work toward having its platform become fully interoperable with FCC's SIP³¹ video interoperability standards for point-to-point video calling.
289. **CDBC.VRS-DWCC** stresses the importance of Communication Equity to CAV and that it must always be considered for DDBHH users. It means providing appropriate equipment at no cost to Deaf-Blind users, creating a Deaf-Blind-friendly platform, and solving the interoperability issues.

National Contribution Fund

290. **OVRSC** believes that if there is an annual budget, then CAV should not need to request the budgeted amount every year. However, they should file a request for additional funding above the yearly budget. OVRSC thought the NCF should automatically disburse funding to CAV without any delay.
291. **DWCC** says that the CAV must maintain its quarterly reporting and annual application for the NCF funding. These actions would ensure accountability of the CAV and prove to the public how the funds are spent.
292. **DWCC** also thinks that the CAV should ask for several more million dollars as a significant investment to improve the services, create better apps, and develop more reliable and robust networks.
293. **CDGM** would like to increase the budget to include additional promotional and educational awareness in the hearing community, including Government services and banks. They acknowledge that CAV has a DDBHH Community Outreach team, but believe that more needs to be done, significantly raising awareness in remote parts of Canada and hearing communities.
294. **CDGM** would like the CRTC Commissioners and CAV to keep their input on how the NCF can be used to make improvements and create new changes in *SRV Canada VRS*, including updating its technology. The list of improvements so includes having more hours of customer service, providing an interpreter complaint line, and maintaining high quality VRS and customer services for DDBHH.
295. **CAV** requested that the filing date for CAV's annual budget approval application be changed from July 31 to August 31. Their rationale for this request is to allow more

³¹ Session Initiation Protocol. For additional reading: [Forum VRS US Providers Profile TWG-6.1](#)

time to close the 2nd Quarter of the current year and to provide complete information in the projections used in the funding request.

296. **CAV** requested the Commission that the funding cap for CAV be increased from \$30M, which was originally set in 2014, to \$41M.
297. **Rogers** understood the CAV's 2022 budget application sought the full budget cap and its intention to request an increase in the funding cap in this proceeding. They expressed the need to better understand how the CAV's costs will continue to increase in future years beyond a \$30M funding cap and that any proposal by them to increase the funding cap be accompanied by additional evidence regarding the usage of service as well as long term projections.
298. **CDBC.VRS-DWCC** thinks that moving the filing date from July 31 to August 31 is reasonable and appropriate to allow CAV adequate time to close the 2nd Quarter of the current year.
299. **CDBC.VRS-DWCC** agrees that the funding cap for CAV must be increased. We will provide further examination and offer ideas for amounts in a separate document that will be shared shortly.

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?

Reply to Consumer Groups' Interventions

General comments

300. **CDBC.VRS** brought a concern that virtual education provisions are not a one-size-fits-all solution, considering seniors, Deaf-Blind, and Indigenous Deaf might not be familiar with, or might not prefer, Zoom.
301. **CASLI** raises an excellent point that the burden should not fall on the frontline service providers, the VRS interpreters (VI), regarding the user agreement rules of use of the VRS. The **user agreement is what callers can and can't do**. This information was never communicated broadly in ASL and LSQ. The practice of the interpreters advising the callers of the policy adds stress to an already demanding job.

302. Each item [of the user agreement] should be a separate video so callers can quickly check what the policy states. Further, when **CAV changes a policy or reminds callers of a policy that existed but was not regularly enforced, this information should be sent out in ASL and LSQ.**
303. The written policies used are a likely barrier to understanding due to the knowledge barrier due to the known and documented literacy issues in the deaf community. The Canadian Association of Sign Language Interpreters supports this³²
304. **CDBC.VRS-DWCC** reminds the CRTC and the CAV that English or French may not be a Deaf person's first language. Sign Language is their primary language. Consumers have not seen the privacy policy or user agreement in sign language. Therefore, CAV must do its part and take responsibility to make these critical policy documents accessible in the language of Deaf sign language users - ASL or LSQ.
305. It must be noted that Article **11 of the UNDRIP** outlines the right to respect Indigenous values before informed consent.
- 2.** States shall provide redress through effective mechanisms, which may include restitution, developed in conjunction with Indigenous Peoples, with respect to their cultural, intellectual, religious and spiritual property taken without their free, **prior and informed consent** or in violation of their laws, traditions and customs.
306. Therefore, the CAV must ensure its actions are: "in line with UN and international legal framework, where policies on Indigenous Peoples ensure the organization makes all due efforts to respect, include and promote Indigenous issues in its work."
307. While these standards have shifted from community 'outreach' to 'engagement,' the CAV has yet to include the international obligation to seek the **free, prior and informed consent** of Indigenous communities.
308. While the DWCC has an Indigenous member who proposed solutions:
- Engage with local communities, including Indigenous communities, and promote and respect equity, diversity and inclusion of radicalized and marginalized groups.
 - Informed public education and awareness building is critical to implementing Indigenous rights. This awareness is the responsibility of all, including CAV, to be mandated by the CRTC.
309. Further reading and visualization of these Indigenous principles can be found in these

³² Public Record TNC 2021-102 - CASLI's Intervention, page 4.

resources.³³

Government, Businesses, Institutions

310. **CAD-ASC** says succinctly, “Some frustration about VRS is not about the service itself, but rather that many governments, businesses and institutions do not know what VRS is and its purpose.”
311. **CDGM, OVRSC, DHH Coalition, and DWCC** all recognize that the CAV's focus was on the Deaf community, which is understandable, but now it is time to switch gears and ramp up the education and awareness for the hearing callers. Some further clarify which hearing callers are businesses, institutions, governments at all levels and individuals unaware of the VRS.
312. **DHH Coalition** and **DWCC** further stated that this public education would assist in two things: 1) VRS' function and the necessity of not treating VRS calls from consumers as legitimate regular calls and not as third-party calls; and 2) move government agencies away from the old concept of telling Deaf callers to use the direct TTY lines and to recognize that a small number still use these devices: often Deaf-Blind persons or senior citizens. Also, to further explain or describe this VRS service as a different communication model than the TTY.
313. **CDBC.VRS-DWCC** supports all the groups in that the focus needs to be shifted to the government agencies, institutions and businesses and the general hearing caller public to improve and enhance the ASL and LSQ callers' experiences with VRS calls. It should be added to its top priorities in the next phase of VRS service provisions.

VRS caller challenges with third-party issues

314. **CAD-ASC** describes the VRS customer experience as “callers are often wasting time [with businesses and institutions] a significant amount of time on the phone, questioning and verifying the caller's identity to the point where a 5-minute call can quickly turn into 15.” So much time is taken to explain what VRS is. Sometimes these people need to speak with the manager to get approval to conduct business through VRS, which has harmful implications for DDBHH users.
315. **CAD-ASC** and **CDGM** further explain that sometimes the interpreters have to step in to clarify who they are and repeatedly give their badge numbers to the institutions or to explain that the interpreters cannot make decisions for them and are simply there

³³ Free and Prior Consent - [link](#)

to interpret the conversation on the phone, “which is a headache-inducing situation for the DDBHH caller.”

316. **CAD-ASC** states, “there are plenty of financial institutions and government agencies such as Canada Revenue Agency and Service Canada still questioning the VRS callers and placing them on hold to verify with management or its policies.” **OVRSC** mentions that “some financial institutions would force Deaf users to sign paperwork to “authorize” the third party (Canada VRS) to be able to accept calls.”
317. **CAD-ASC** further comments that “it is expected that small businesses may not know about this, large organizations and institutions from federally regulated entities should be able to follow ACA compliance and know how to deal with callers using VRS.”
318. **CDBC.VRS-DWCC** supports that large organizations and federally regulated entities recognize their duty to comply with the *Accessible Canada Act* and adjust internal policies on addressing incoming callers so that the challenges VRS callers are having can be managed and reduced considerably.

Other concerns

319. **CAD-ASC** stated a legitimate concern about the lack of understanding of the difference between Video Relay Services and Video Remote Interpreting. With more people starting to understand the roles of virtual interpreters, the demand for interpreters is growing.
320. **CDBC.VRS-DWCC** supports the general public's education and awareness of the differences between VRI and VRS.
321. **DHH Coalition** proposes that the VRS system better explains what features / capabilities current and future VRS applications have / will have (e.g., DHH consumers should know they could make impromptu self-announcement when the hearing party answers the call).
322. **CDBC.VRS-DWCC** supports increasing the number of videos that describe the VRS features or information about such topics as self-announcement, how to use 9-1-1, step by step, to name a few.
323. **OVRSC** believes point-to-point usage is extremely low due to a lack of awareness and other technical design factors.
324. **CDBC.VRS-DWCC** wholeheartedly supports the **OVRSC**'s comment, especially

considering that there is a great benefit to utilizing point-to-point calling in light that the wireless service providers have accessibility packages that include current data with the monthly wireless packages. Specifically, there should be an increase in point-to-point call promotions.

Wider scale promotions broadcast to larger mainstream audiences

325. The **CDBC.VRS**, **DWCC**, and **CDGM** all suggest spreading awareness on a broader scale of promotions or broadcasting to wider audiences, and not be limited to social media, but also reaching and spreading out visual media to increase awareness through Public Service Announcements broadcast on actual television, newspapers, magazines, radio and the internet. Just promoting the VRS service to the Deaf community is not enough. It is time to switch to increasing awareness through the hearing population.
326. On this topic, both **CDGM** and various **DWCC** Community members had concerns about the CAV production "*Do not Hang Up!*"
- Why wasn't this video produced and promoted on television?
 - VRS can be used for a wide range of purposes and types of calls, not just for doctor calls, and needs to be shown to the general population so they can learn and understand better how VRS works and the role of the VRS interpreters
 - Apparently, only one advertisement was created by the CAV, and it should have been shown more frequently over several years, rotated by various ads or PSAs, and broadcast much more widely.
327. **CDBC.VRS-DWCC** supports that more PSAs should be produced and spread out on a broader scale through television and broadcast and shared across multiple platforms. They should create various videos with examples of the benefits of VRS, such as episodes that show various neat video dramatizations, such as the one '[Life is full of Great Surprises](#)' (Purple, 2011) as an example of family VRS calls. Show a job interview, a conference call, restaurant reservations for a group, phone call with grandmother. Some videos should show the hearing callers calling the Deaf VRS user, encouraging the statistics to increase for these calls. In support of **OVRSC**, it should be clear that one should not only be in the Deaf community to educate the hearing population but also the TSPs and industry partners.

Social media

328. **CAV** says it has Facebook postings with links to ASL and LSQ videos that are archived on CAV's YouTube channels at [SRV Canada VRS – ASL](#) and [SRV Canada VRS – LSQ](#)

329. **OVRSC** mentioned that currently, CAV-ACS has a private/closed Facebook group that does not accept any comments from the general public. **OVRSC** highlights that CAV-ACS has no interactive mode of public communication with the Deaf community, mostly at their community events and directly via customer service (9050).
330. **DWCC, CAD-ASC and OVRSC** stated that community members mentioned that more information needs to be spread out to the community, and this is not being done and seems only limited to CAV's own Facebook Page. Three organizations suggested adding accounts to Instagram, Tik-Tok, and Twitter to promote to specific audiences such as the youth, or where the wider audience is of telecommunications industry partners, has a more significant presence. The word needs to reach the Deaf community and the general public so that these platforms can capture a greater segment of the community.
331. **CDBC.VRS-DWCC** members note that CAV's presence on LinkedIn is significant for outreach to the professional network and hopes there will be more shares from that platform, as well as opening up other social media channels that cater to specific audiences' access to the TSPs' followers.

Proposed ideas for solutions

332. While the **DWCC** had multiple Community Members answering the questions, the group came up with several proposed solutions:
1. CAV hires staff to teach and educate to increase awareness and educate hearing callers to the public, including businesses, banks, and the Government.
 2. Develop a plan to create awareness among businesses, government and institutions to ensure that this VRS service is a different communication model than the TTY.
 3. Educate hearing callers on how to call Deaf, Deaf-Blind, and hard of hearing customers or clients.
 4. Improve the equipment and features for Deaf people to be alerted when hearing people call.
 5. Create direct phone numbers for these government departments, businesses, and banks so that Deaf people can call them directly, and hire Deaf ASL or LSQ staff to manage the calls to the public lines using the VRS platform, direct calling, and point-to-point calls.

Consumer groups proposed other ideas:

333. **OVRSC** believes that “CRTC does have the role to spread awareness and coordinate with various government agencies to ensure that they are enforcing the acceptance and awareness of VRS calls within government agencies and entities they oversee or work with.”
334. **CDBC.VRS-DWCC** supports the Outreach team by contacting community members and recruiting local organizations to reach out to their membership. These efforts will increase the number of VRS users. As these non-profits rely on grants, financial support for this engagement would be mutually beneficial.

Specific Community Awareness

Deaf-Blind Awareness

335. **CDBC.VRS and DWCC** both expressed concern that “there are still individuals in the Deaf and Deaf-Blind communities who are unaware of this service, and in fact, some Deaf adults who have not used sign language interpreters or text-based message relay services. This narrowed demographic needs more hands-on in-person support, especially for registration to set up the app, especially to include Deaf-Blind people.
336. **CDBC.VRS-DWCC** agrees that the public awareness and education initiatives should include Deaf-Blind individuals, senior citizens, and Indigenous community organizations and stakeholders.

Indigenous Awareness

337. **DWCC**, with its Indigenous consultant and community members, is the only consumer group that mentions potential Indigenous Deaf VRS users. CAV needs to invest in outreach activities such as [promotions and awareness campaigns] to Indigenous centers, mental health and other service providers catering to non-users to create awareness of VRS.”
338. **CAV** states that it is honouring the wide variety of Deaf people who make up Canada’s Deaf, hard of hearing and speech impaired Community, including adults, seniors, children, new Canadians, **Indigenous**, low vision/Deaf-Blind, athletes, registered Stakeholder organizations, and others.³⁴
339. In its 2021 Annual Report, the CAV describes its plans for the future: "outreach will also focus on groups that have not yet been reached, including women’s and homeless shelters, immigrant service agencies, organizations with Deaf and hard of hearing members, and LGBT communities.“³⁵

³⁴ CAV Response to Request 17 May 2021 CAV(CRTC)11Mar21-32 NOC 2021-102 Page 1

³⁵ CAV-ACS 2021 Annual Report, page 23 - [link](#)

340. **CDBC.VRS-DWCC** views such statements by the CAV as contradictory because of the \$41 million budget request for the year. There is no plan in the 2021 report to develop outreach to any of the Indigenous or Deaf-Blind communities. Once again, Indigenous people and Deaf-Blind people are left behind. **No more.**
341. Therefore, **CDBC.VRS-DWCC** wishes to remind the CRTC and the CAV of the ***Truth and Reconciliation Commission of Canada*** Calls to Action that applies here. Our consumer group pays particular attention to *Article 92* with Business and Reconciliation and its applications to education and awareness, as follows:

TRC Article 92, Business and Reconciliation

- i. Ensure that Aboriginal Peoples have equitable access to jobs, training, and education opportunities in the corporate sector, and that Aboriginal communities gain long-term sustainable benefits from **economic development** projects.
 - ii. Provide **education for management and staff** on the history of Aboriginal Peoples, including the history and legacy of residential schools, the *United Nations Declaration on the Rights of Indigenous Peoples*, Treaties and Aboriginal rights, Indigenous law, and Aboriginal–Crown relations. This will require skills-based training in intercultural competency, conflict resolution, human rights, and anti-racism³⁶
342. **CDBC.VRS-DWCC reaffirms that CAV needs to take steps toward Truth and Reconciliation by undertaking efforts for public awareness of Indigenous sign language users in remote locations.**
343. As part of our commitment to reconciliation, we want to continue working with Indigenous DDBHH Peoples through ongoing dialogues to build a vision of human rights that steps beyond existing boundaries and truly reflects the issues, perspectives and aspirations of Indigenous DDBHH Peoples across Canada.

Reply to Telecoms' Interventions

344. **CDBC.VRS-DWCC** finds it fascinating how the telecommunication service provider companies have such a bright rosy outlook on the Canada VRS system. They look outside and only see what they see in glossy annual reports and social media promotions on the external platform. The user experience satisfaction they are witnessing results from skewed data presentation. From the consumer perspective, the information presented is being misrepresented in reporting, as the realities are being under-reported.

³⁶ Truth and Reconciliation Commission (TRC) Report - [link](#)

345. The telecoms also talked about the outreach activities undertaken by the CAV to reach sign language users and how effective it was, including the ability to adapt the activities to virtual means through the COVID-19 pandemic. It makes sense that the number of calls increased in volume due to the realities of the pandemic. The TSPs have indeed had a contributory role in promoting the VRS through their websites. As shown in several CAV annual reports, the numbers of users and callers increased yearly.
346. All telecoms referenced the Sage Report, of which **CDBC.VRS-DWCC** questions its validity because the total number of participants cited is 32, with 26 ASL users and 6 LSQ users), which appears to be a tiny pool of respondents to be reliable or comprehensive. The research participants depended on registering for the CRTC Accessibility Research Database at sign-up for the VRS number and service. The collaborative group did not see much promotion about the registry for this research, which would account for the small pool of participants. Thus, while the telecoms have some excellent comments, the root problem of the Sage Report is that the pool is just too small compared to the current 8,000+ VRS users, so the results in the Sage Report are doubtfully related to the actual realities of the consumer experience, with such a limited pool of participants.
347. **CDBC.VRS-DWCC** notices frequent comments by the telecoms, particularly **CWTA** and **Rogers**, two telecom groups that agree with the Sage Report. They referenced this report, stating that now that the numbers have grown for VRS users, CAV can switch its focus on targeting the non-users and the general public and less on the broadly targeted outreach activities. **Rogers** agrees that targeting awareness activities to businesses, agencies, and individuals who would receive VRS calls would positively impact users of VRS.
348. **TELUS** and **BELL** position themselves where they agree that the “Canadian Administrator of VRS (“CAV”) has efficiently and effectively provisioned VRS in Canada, with an overall high level of user satisfaction.”³⁷ Accordingly, **TELUS** concurs with CWTA that any changes to CAV’s structure and mandate are unnecessary.
349. **CDBC.VRS-DWCC**’s frustration with the telecoms is that it is clear that they have not seen the consumers’ experience and are only seeing it from the CAV telecommunications perspective. Can the TSPs see the commentary on the *SRV Canada VRS* public page to see these realities?

³⁷ Sage Research Corporation, *Video Relay Service Public Opinion Research: Prepared for the Canadian Radio-television and Telecommunications Commission*, June 2020 at p 7.

QUESTION 13

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

Reply to Consumer Groups' Interventions

350. **CAD-ASC, CDGM, CDBC.VRS and DWCC** all support that stakeholders have a role to play in promotions and increasing awareness of VRS through their different platforms, such as social media. All believe every organization should have some role, and CAV should work closely with the DDBHH stakeholder groups to spread awareness.
351. The **OVRSC** raises a concern that current stakeholders in the Deaf community should not be the only ones to carry the burden of promoting and increasing awareness of VRS, as many already are understaffed and underfunded, 'staffed' by volunteers. It is their view that the TSPs bear equal responsibility for promoting VRS.
352. The **CAD-ASC** further explains that "CAV's planned promotions objective is to spread awareness about VRS through websites and social media."
353. **CDBC.VRS-DWCCs** would like to point out that while stakeholders want to share with their members, CAV's Facebook Page settings do not consistently allow shares, and comments are turned off, making it much more difficult for the stakeholders to assist in sharing updates. Even the TSPs would have difficulty getting information from Facebook.
354. **CAV** isn't on Twitter, so that also poses a challenge for the one place where the telecommunications industry has a presence, where the TSPs could be retweeting CAV's posts to the general public and increasing the VRS user numbers. While using Twitter, Deaf community members could also retweet to assist in creating awareness and gaining more VRS users.
355. The stakeholders cannot just rely on email forwards to their membership. According to team members, emails or newsletters from CAV have slowed down, and there has not been any consistency in communication since 2021.
356. **CDBC.VRS-DWCC** views that TSPs should not only limit their promotions and awareness through their websites but also on social media, with CAV's Facebook posts, and also if CAV was on Twitter, the TSPs could help retweet the mass followers and create awareness across a larger pool of Canadians.

357. **CAD-ASC** makes an excellent point when they highlight that the CAV reported, according to its 2020 Annual Report, that the current VRS users registered with the service are 8,126. The stark contrast between the number of DDBHH people in Canada and total users suggests there is room for growth regarding awareness of VRS among sign language users.”
358. **CDBC.VRS-DWCC** agrees that there could have been considerably more by now and that there need to be more incentives for stakeholders to assist, which is basically what the **DHH Coalition** suggested, to subcontract and perhaps financially compensate to help with public awareness in their geographical areas.

Consumer group proposed solutions

359. **OVRSC** says that the **CAV** is more than capable of maximizing the marketing tools as the budget does include marketing and education. Their perspective is that the CAV-ACS needs to make a much broader effort, and the TSP stakeholders need to do more with promotions. The TSPs should assist in ensuring a massive public awareness announcement and campaign sharing the accessibility of connecting to VRS and educating on what it is.
360. **CDBC.VRS-DWCC** agrees that this should be made possible for the rest of an untapped market they can break into among their thousands of social media followers.
361. **DWCC** comments that Stakeholders need to be aware that Indigenous DDBHH needs more support and cultural sensitivity regarding limited broadband internet, especially those in rural and remote locations. CAV needs to take steps on the path to reconciliation to assist the Indigenous DDBHH with communication and accessibility issues while promoting affordable broadband internet and services in remote and rural areas.
362. **DWCC** suggested that an advisory committee made of members of the registered stakeholders needs to be created, and at the first meeting, a Terms of Reference that shows an understanding that the non-profit stakeholder groups have a duty and responsibility to assist in disseminating information to its membership. Internally, they advise and give feedback to the CAV board and administration.
363. **CAV** does agree that its 70 stakeholder organizations have an essential role in assisting in the promotion and increasing awareness of VRS to the Deaf community as well as to the general public. They have a webpage with this information.

364. **CAV** should be holding more Stakeholder Engagement sessions, as seen in this [closed group](#) link, but they should also have “open stakeholder group engagement sessions” as well. It’s been a while since some of the groups, so it would be a good idea to host meetings for a refresher to review what these stakeholder groups can do to get the word out, not only by tapping into their existing promotional platforms and channels. Mainly to check all that is on this [webpage](#). These sessions could review the policies and procedures that are not in ASL and LSQ.

Reply to CAV & Telecoms’ Interventions

365. **CWTA, Bell, Telus** and **Rogers** claim that the CAV is best positioned to provide the organizations with awareness activities aimed at the general public. They all view requiring other stakeholders to also conduct promotion and outreach as duplicative, inefficient, unnecessary, and not as effective as the CAV. They view the CAV should maintain full responsibility to promote and increase awareness of VRS among the users and the general public.
366. The **TSPs** feel **CAV** is generating enough of its growth through traffic to social media channels. The **TSPs** generally feel they do their part by promoting Canada VRS on their company accessibility web pages.
367. The **TSPs** keep referencing *The Sage Report*³⁸ that VRS is already well-known in the Deaf community and that it is time to refocus its promotional efforts on non-users and the general public. **Rogers** agrees with targeting awareness activities to businesses, agencies, and individuals who would receive the VRS calls.
368. **CDBC.VRS-DWCC** respectfully submits that the TSPs could be doing more. They are on social media, and the CAV should be making their social media posts shareable so the TSPs can share their posts on their Pages so the greater public can see and learn more about Canada’s VRS. CAV should be on Twitter so the TSPs could retweet their posts to the general public. The telecommunications industry, including all of the telecoms, is on Twitter, where the industry has an extensive public platform.
369. Whereas **BELL** says, it is unnecessary and inefficient to require other stakeholders to undertake promotional efforts and states that only the CAV is uniquely capable of promoting VRS, with its “deep relationships within the community.” It was noted that the stakeholders do not have the experience, knowledge and connections to do the work of promotional effects. This statement is deeply offensive to all the stakeholders participating in this proceeding.

³⁸ Sage Research Corporation, *Video Relay Service Public Opinion Research: Prepared for the Canadian Radio-television and Telecommunications Commission*, June 2020 at p 7.

370. **DWCC** disagrees with Telecom companies because they believe CAV should be the one who would be responsible for promoting and raising awareness about VRS. This attitude offends the Stakeholders and our Deaf community. Bell mentioned that the stakeholders are inexperienced, with no deep relationship with the Deaf community. It is quite the contrary.

371. The **CDBC.VRS-DWCC** members have had their own experiences, which shows that the Deaf community is much more far-reaching than Bell believes. One anecdotal real-life situation was shared in the **CDBC.VRS** intervention, and a new one below, is shared and highlights how Indigenous DDBHH persons deserve to be included in *SRV Canada VRS*, especially those in remote communities, where VRS would be life-changing. **BELL**, please take note:

“On Friday afternoon, an Indigenous Deaf person knocked on the door to see if I was home, and it was urgent. Over coffee, the person started to talk about the issues at work as a result of a misunderstanding and the kid’s school related to counselling issues. The person burst out crying as the person described the lack of support and the frustrations about the lack of interpreting services in rural areas.

The person said, “What am I supposed to do? I cannot afford to lose my job, and my kid needs immediate help, and my kid does not have the right support for the kid's mental health and Indigenous safe space too.”

To show their support and focus on problem-solving, I asked them, “Have you ever used VRS before? Have you thought about using this VRS to communicate with your boss to clarify what’s going on?” I showed the person where to register and how to download the VRS app. The person’s first test call was with a friend. Then the person called the boss and obtained an Indigenous counsellor. The person’s job was saved, and the kid got the help they needed”.

372. From an Indigenous perspective, *SRV Canada VRS* needs to reconsider making changes for the policy to be flexible in rural and remote areas with minimal interpreting services. Accessibility is considerably less in those remote areas.

373. The **CAV** should make extra efforts to reach Indigenous in rural and remote areas considering Indigenous rights. UNDRIP is recognized and adopted by the Government of Canada as Bill C-15. UNDRIP gives particular attention to Indigenous Deaf Peoples in the implementation of this Declaration as described in:

- **Article 21.1** Indigenous Peoples have the right, without discrimination, to the improvement of their economic and social conditions
- **21.2:** Particular attention shall be paid to the rights and special needs of Indigenous elders, women, youth, children and persons with disabilities.

374. The first barrier is that the primary service providers, such as the *SRV Canada VRS*, have no Indigenous staff, and currently, many things are inaccessible to Indigenous DDBHH persons. There may be very few in Canada, but Indigenous DDBHH individuals want Indigenous service providers, from the outreach team personnel to the VRS interpreters (VIs). These resources must be located in Indigenous communities or spaces with no accessibility barriers.
375. Therefore, the CRTC, the TSPs, and the CAV need to respect and implement strategies to protect the rights of Indigenous Deaf persons. **CDBC.VRS-DWCC** asked its Indigenous consultant to propose recommendations:

Recommendations for Public Outreach to Indigenous Communities

1. Create a public education campaign for Indigenous DDBHH persons about *SRV Canada VRS and communication accessibility*
2. Make materials easily accessible at Band offices, Métis organizations, Friendship Centres, Indigenous political organizations, post-secondary schools, secondary schools, and health centres.
3. Create a step-by-step process for Indigenous DDBHH applicants, including crucial information, list what resources are available, and what adverse impacts may look like for Indigenous DDBHH persons.
4. Create videos in ASL and LSQ or fact sheets to talk about raising the awareness of *SRV Canada VRS* and for change in the relationship between Indigenous DDBHH Peoples and Canadian society. Indigenous DDBBH Peoples are entitled to all of their rights under UNDRIP.

QUESTION 14

Question 14. When should the Commission next review VRS?

Reply to Consumer Groups' Interventions

376. After reading the Interventions from the **CAD-ASC**, **DHH Coalition**, **CDGM**, **OVRSC**, **DWCC**, and **CDBC.VRS** interventions, it seems the opinions on when the subsequent view should be range from two to three years, therefore **CDBC.VRS-DWCC** figures the average number of years all the DDBHH consumer groups see the following VRS review is **three years**.
377. The **CDBC.VRS**, **DWCC**, and **DHH Coalition** had additional points.³⁹ “CRTC must review it three years after the new and updated policy due to this first review delay, and CDBC.VRS states “there should be a review every three years for the next two reviews, and only when it stabilizes the review can be every five years.” DHH Coalition.⁴⁰ “Reviews should be conducted especially when technology and interpreter marketplaces evolve so quickly...” and finally CAD-ASC“ to align with the timeline for accessibility reporting related to the *Accessible Canada Act*,” include the additional comments or rationales for the three years.
378. Three groups, **CDBC.VRS**, **DWCC**, and **OVRSC** commented that the current review “took long enough” from the launch with the number of issues it had to examine and that it must shorten the years for the following review.
379. According to multiple parties, the following needs to be addressed before the reviews are established over long periods, i.e. five years. For some examples:
- **CDGM** wants to ensure that high-quality services and standards are established within ten years.
 - **OVRSC** wants “the timing between reviews re-visited” after communication equity with hearing users is achieved.
 - **CAD-ASC** would like to see a feedback mechanism and progress reporting on the VRS services in Canada, such as the registration base for VRS users, educational awareness programs, quality of services, the technical platform, governance and funding, and sign language interpretation.
 - **DWCC** states that in the period before the next review, the CAV and the *SRV Canada VRS* improvements are to be established and monitored:

³⁹ TNC 2021-102 DWCC Intervention

⁴⁰ TNC 2021-102 DHH Coalition Intervention

- a. A better technical platform that includes Deaf-Blind accessibility
- b. Support of Interpreters training for this updated technology
- c. Communication Facilitator services for the Deaf-Blind
- d. One-on-one technical support for: Senior citizens, Deaf-Blind, Indigenous, and language deprived.

380. Therefore, **CDBC.VRS-DWCC** emphasizes there should be **two** consecutive three-year reviews before it becomes a five-year review, giving the system time to stabilize and ensure full inclusive, diverse, equitable, and accessible (IDEA) involvement of Indigenous and Deaf, Deaf-Blind, and Hard of Hearing VRS users.

Reply to CAV and the Telecoms' Interventions

381. All **CAV** “recommends that it should do so no less than five years following the issuance of the Commission’s determinations in this proceeding...” while the four telecommunications industry participants, **CWTA, Bell, Telus, and Rogers**, state that “the 5-year review cycle is appropriate.”

382. **CDBC.VRS-DWCC** disagrees with **CAV’s** “history of continuous improvement” statement. There are still too many outstanding issues and challenges that need to be examined, and a review within three years, at a minimum, to ensure they follow the new policy is appropriate. Preferably the CAV and *SRV Canada VRS* should be reviewed at least twice every three years until it stabilizes, and then at that point, it can be spaced out to five years.

Conclusion

383. **CDBC.VRS-DWCC** thanks all the parties for their comments in this proceeding and appreciates the support of the Indigenous Deaf persons with their quest for access to VRS in Canada. Our group asks that everyone respect, support, and ensure that Indigenous Deaf persons and persons with disabilities are not left behind in the continuation and future of *SRV Canada VRS*.

384. In the spirit of Truth and Reconciliation, our group asks the CRTC to consider all points of view in both our Intervention and Reply to Intervention that were expressed about the Indigenous communities’ accessibility to VRS.

385. **CDBC.VRS-DWCC** wholeheartedly believe in this statement: “We should not confuse what we are doing with human rights with reconciliation.”⁴¹

⁴¹ Ontario Human Rights Commission: p.10 - [To dream together: Indigenous peoples and human rights dialogue report](#)

386. **CDBC.VRS-DWCC** greatly appreciates the Commission's consideration of its Reply to Interventions documents. Should you have any questions, please do not hesitate to contact all of us.

Sincerest regards,

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