

**CDBC.VRS-DWCC Comments to CAV's Answers to CRTC RFI Q6-Q13:
Topic 2: Architecture, Operations and Tech Requirements**

This document from **CDBC.VRS-DWCC** focuses on Architecture, Operations, and Tech Requirements.

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Executive Summary

ES 1: CDBC.VRS-DWCC considers Architecture, Operations, and Tech Requirements an essential component of the VRS review to ensure *SRV Canada VRS* improves its system design. There are a total of four **CDBC.VRS-DWCC** Committee Members (CM) responding to this category.

ES 2: *SRV Canada VRS* users expressed high dissatisfaction with the poor-performing IVèS platform and want a replacement with a better quality platform. A Committee Member shared their embarrassment that Canada has been continuing with the IVèS platform for years despite that other VRS entities had dropped it within two weeks of trial.

ES 3: CDBC.VRS-DWCC wants to see improved communication from *SRV Canada VRS* on outages. Communication is a direct way of informing users by having in-app notification alerts transparent on their causes and an estimated duration of service restoration. In addition, make the outage reports immediately available to the public.

ES 4: *SRV Canada VRS* users are incredibly frustrated with unnecessary call interruptions where VIs would transfer in the middle of a VRS call. Users feel that VIs have all of the arbitrary power, which needs to be improved to make the users feel more empowered. VIs should start a call with the expectation that they will stay online until the call's completion and be flexible about their shift ending time. There must be an expectation that VIs will NOT transfer during critical or crucial calls without the user's agreement. **CDBC.VRS-DWCC** strongly recommends that if a VI thinks they'll need a break within the hour to take it before they start the next VRS call to avoid unnecessary call interruptions. Perhaps CAV could create a new feature in the app: a pop-up screen asking users whether they are accepting call transfers before the start of a VRS call. Bottom line - enable *SRV Canada VRS* users to feel more empowered before and during VRS calls.

ES 5: There needs to be greater attention to VRS 9-1-1, redesigned to allow *SRV Canada VRS* users to call and connect directly to it first. Among the issues brought to our attention, one was to reassure callers that the VI must remain online for the duration of the VRS 9-1-1 call until the problem has been resolved and NEVER transfer in the middle of it. In addition, **CDBC.VRS-DWCC** strongly recommends that CAV use a fallback option to back up VRS 9-1-1 services in case of a network failure. With the recent severe outage of Rogers on Friday, July 8th, 2022, it is more important than ever to be prepared for the unexpected so that DDBHH doesn't find themselves scrambling to obtain emergency services.

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ES 6: CAV needs to have more sense of its social responsibility rather than waiting to be mandated by CRTC. This sense means ensuring Deaf-Blind users can access this essential telecommunications service. Also, we live in an increasingly globalized world where various gender identities and ethnicities are commonplace. Representation and social identification are crucial and thus must be reflected in the CAV staff and VIs. **CDBC.VRS-DWCC** encourages CAV to realize that being proactive for visual accessibility and diversity initiatives demonstrates social responsibility in a truly inclusive environment.

ES 7: Visual accessibility is an essential component of *SRV Canada VRS*. The CAV must communicate this in CAV's guidelines for all VIs to conform to since it is paramount professionalism that VIs must adhere to in the best interest of all users. The CAV must create new policies to reflect this for *SRV Canada VRS* to be a truly inclusive service for all users, particularly for Deaf-Blind users. This is an essential and valued telecommunication service that must meet the needs of individuals with tactile and varying vision degrees, including intervenors and Deaf Interpreters (DIs). **CDBC.VRS-DWCC** formally requests the CRTC to expand the National Contribution Fund (NCF) to support the cost of Deaf-Blind users' accessibility service needs for VRS-specific use.

ES 8: **CDBC.VRS-DWCC** wants to see an independent screening body of at least five Deaf ASL instructors with a minimum of 10 years of experience to evaluate VIs and provide neutral feedback to these VIs. The overall goal of this body is to enhance the function of VRS and the performance of VIs. The receptive skills of VIs are often a significant concern of *SRV Canada VRS* users, so having this body would benefit all parties involved to ensure that VIs have the appropriate receptive skills required.

ES 9: The Deaf Ecosystem is greatly valued by Deaf Communities worldwide as it provides economic, social, political, and cultural support. **CDBC.VRS-DWCC** recognizes the importance of Deaf Interpreters (DIs) for full language access to a spectrum of Deaf users and wants CAV to protect the growth of DIs and support their opportunities to work within *SRV Canada VRS*. This includes recognizing DI certificates from foreign countries due to the limited supply of qualified DIs. In addition, **CDBC.VRS-DWCC** wants CAV to further support the Deaf Ecosystem by giving preferential employment and business opportunities to Deaf individuals due to systemic barriers toward Deaf people to level the employment field.

ES 10: CAV's initiative in striving for 100% of the VIs provided by *SRV Canada VRS* to be from Canada has been admirably achieved. **CDBC.VRS-DWCC** applauds CAV for its strong support of our Canadian Ecosystem. Although, we would like to see Canadian

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Video Interpreting Providers (VIPs), not foreign VIPs, run the call centres to support our Canadian Ecosystem further.

ES 11: There needs to be more investment into communication equity. **CDBC.VRS-DWCC** wants CAV to upgrade its current app to be similar to Sorenson Communications' Wavello app. This app would be highly beneficial to all parties involved. This app would positively enhance communication for everyone. In addition, **CDBC.VRS-DWCC** requires that CAV solve its interoperability issue by replacing the IVèS platform with one that does not have such an issue. It is unacceptable to focus on the small percentage of Point-to-Point calls as a reason to neglect to solve this issue. Community equity must be the primary focus. DDBHH people deserve full communication access similar to their hearing counterparts.

ES 12: According to the *Accessible Canada Act*, American Sign Language (ASL), Langue des Signes Québécoise (LSQ), and Indigenous sign languages (ISLs) are the primary languages of Deaf people in Canada. This recognition of Sign Languages means *SRV Canada VRS's* services must ensure total communication equity for DDBHH. **CDBC.VRS-DWCC** formally requests CRTC to expand the National Contribution Fund (NCF) to cover the cost of investing in a better-quality platform and solving the interoperability issues to ensure communication equity. The aim is to ensure that video calling is fully equivalent to voice calling, not less.

Methodology

1. Four members of **CDBC.VRS-DWCC** participated in this topic of System Design, all bringing in their years of experience with *SRV Canada VRS* since its launch. The team leaders sent the questions and CAV's responses to each committee member to provide comments from their experiences and perspectives.
2. Each Committee Member (CM) is assigned a number, and it is their words that they contribute. For example, one member will be labelled and identified as "CM#2." The following Committee numbers participating in this Response are **CM#2, CM#3, CM#4, and CM#10.**
3. To create a flow between the questions, one Committee member consultant pulled all the answers together and tied up the response for each question, summarising the answers together for each question in the same numbered Response (R#).

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General Comments

4. Overall, the **CDBC.VRS-DWCC** wants to see the CAV increase its gender and ethnic diversity initiatives and be more inclusive of Deaf-Blind users. This means the CAV is more proactive in its social responsibility by creating its policies and guidelines rather than waiting to be mandated by CRTC.
5. **CDBC.VRS-DWCC** applauds the Canadian Administration of Video Relay Services for their best efforts in structuring and implementing *SRV Canada VRS* since its inception in 2016. However, our most significant concern is the poor-performing IVèS platform that CAV must replace to enhance the VRS quality experience and the need to improve VRS 9-1-1 calls.
6. **CDBC.VRS-DWCC** acknowledges the positive impact the COVID-19 pandemic has had on the services provided by *SRV Canada VRS*. We applaud them for adjusting their business operations to allow VIs to work from home to meet the increased demand and provide economic support to sign language interpreters who could not work in the community due to COVID-19 protocols. This change greatly benefited the Deaf Community - communication equity within the telecommunications industry.
7. A Committee Member stated that they would like to see an exponential growth of sign language interpreters and wants to see more significant support from CAV towards VIPs establishing Community Interpreter Agencies. This would be a beneficial investment for all parties involved to increase the number of interpreters in various communities. **CDBC.VRS-DWCC** fully supports Community Interpreter Agencies as an investment in community interpreters.

QUESTION 6

Q6. Provide an overview of the technical architecture and operations of VRS, including the video platform provider and the video interpreter providers, including”

IVèS Platform

8. **CM#3** shared their personal story and an excerpt of their experience. “A few years ago, we had conversations with the representatives from the major VRS companies in the U.S. separately at Telecommunications for the Deaf, Inc. (TDI)

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Conference. The first question they asked us was: Which platform was CAV running to provide the services? Their facial expression was "gobsmacked" after answering that it was the IVèS platform. Most of these providers had shared their experiences where they dumped that platform two weeks after the trial, and one of them dropped it after just four days. The reason they dropped IVèS was its subpar quality."

9. **CDBC.VRS-DWCC** respectfully asks CAV to replace the IVèS platform with a better-quality platform.

Other Comments

10. **CM#3** acknowledges that CAV made significant improvements on the applications for Windows and Mac OSes IVèS the past three years after the Waterfox fiasco and is appreciative of this enhancement of quality.
11. **CDBC.VRS-DWCC** wants to see more remarkable quality improvement by making the applications more application and user-friendly by incorporating suggestions of improvements by Deaf-Blind users.

Question 6a

Q6a. how the system has been engineered for redundancy to provide seamless services and minimize outages.

No response

12. **CDBC.VRS-DWCC** has no response to CAV's answer to this question.

Question 6b

Q6b. how the service is monitored to ensure it functions optimally.

Other Comments

13. **CM#10** applauds CAV for ensuring internal and external software-based monitoring systems. It's appropriate to have an external monitoring system to

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ensure *SRV Canada VRS* network infrastructure is running smoothly and not collapsing if the internal system isn't working.

14. According to **CM#2**, conference calls are limited to 1.5 hours, often in meetings that are usually two hours. CAV must remove this time restriction to allow *SRV Canada VRS* users to fully participate in discussions on equal par with their hearing counterparts.

Question 6c

Q6c. whether there are planned service outages and, if so, what the reason is and how are users alerted.

Improved Communication from SRV Canada VRS

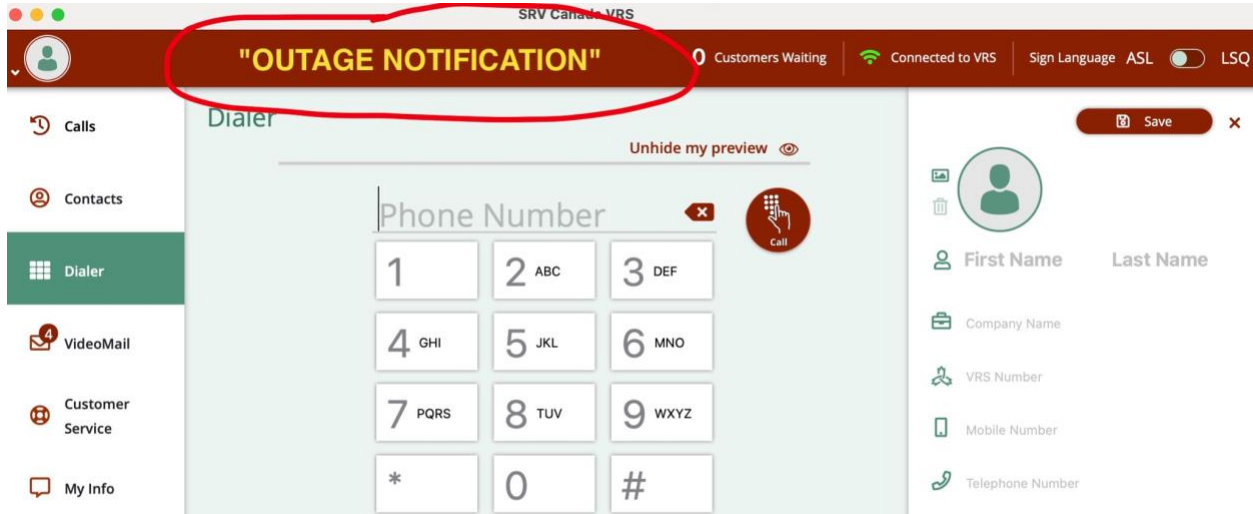
15. **CM#10** agrees that planned outages are scheduled during a period of fewer volume calls but is concerned with how CAV announces its planned outage.
16. **CM#2** and **#10** think that posting on CAV's Facebook page is insufficient as it is not a direct way to inform users that they cannot use VRS at that time. **CM#3** said they would also like to be notified by email and text.
17. **CM#3** shared that DDBHH users are left in the dark about the cause(s) of unexpected network outages. They would like CAV to improve its communication with users by updating them about the unplanned network outages, their reasons, and an estimated length of service restoration.
18. **CM#2** says a monthly Outage Stats report must be available on CAV's website for the public's viewing.

Improved Notification of Outages

19. **CDBC.VRS-DWCC** strongly recommends that CAV post the notice of an outage directly on the app when users are about to use VRS, so they're immediately aware of a current outage.

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20. **CM#2** suggested a notification on the top banner "OUTAGE NOTIFICATION" as an appropriate place. The visual example below shows what CAV could post during a current outage.



Question 6d.

Q6d. the process for transferring calls between video relay interpreters (VIs), including how users are warned, why this is sometimes necessary, and what approaches, if any, have been used to minimize such transfers; and

Unnecessary Call Interruptions

21. **CDBC.VRS-DWCC** has received many complaints from VRS users who have experienced a loss of smooth communications and dropped calls during transfers of VIs since the first day of CAV's launching.
22. **CM#3** firmly recommends that besides the 9-1-1 VRS calls, VI transfers must not occur during critical or crucial calls. Examples include finance, medical, legal, and travel reservations.
23. Once, **CM#10** had a VI inform them 20 minutes into the call that her shift ended in 5 minutes. Unacceptable. The VI should have stayed on the call until completed and subtracted that specific number of minutes from the following change or just ended her work shift earlier.

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24. **CM#2** expects that when a VI informs the user that less than 15 minutes are remaining in their shift, the supervisor or manager must take their place immediately.
25. **CM#10** experienced a situation where they were negotiating their automotive insurance that was minutes from being completed, only to be transferred to another VI. Couldn't the Video Interpreter patiently wait until the critical call was concluded to have the break?
26. If a sign language interpreter can interpret in the community for an hour, then the VI can interpret for upwards of an hour without needing to transfer.
27. **CDBC.VRS-DWCC** strongly recommends that if a VI needs to break in less than an hour, they should just take the break before starting their next round of VIs calls to avoid transferring during the middle of a call.

Empower SRV Canada VRS users

28. While **CM#10** understands the need to maintain the health and safety of VIs, they disagree that calls be transferred in the middle of a VRS call. They think VIs must be prepared to complete a call from start to end as VRS users need to be confident they can proceed with a call without experiencing unnecessary call interruptions.
29. **CM#10** shared that they once connected in a VRS call only to be informed that the VI was taking a break in 5 minutes and would transfer then. They told the VRS caller immediately that they would move to another VI to avoid call interruption.
30. If a VI will require a break shortly, there needs to be a pop-up screen asking the user if they are okay with a call transfer rather than the VI arbitrarily deciding they need a transfer. This disempowers the VRS users.
31. **CDBC.VRS-DWCC** wants *SRV Canada VRS* users to have greater freedom in choosing whether they will accept a call transfer and to see VIs staying on the call from start to end.
32. **CDBC.VRS-DWCC** wants *SRV Canada VRS* users to be empowered to decide how VI calls are handled, especially for call transfers.

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9-1-1 calls

33. **CM#4** believes it is essential for the VI to remain during a 9-1-1 VRS call while the issue is ongoing and until the problem has been resolved. They say never to transfer halfway as it can generate huge misunderstandings and frustrations for the VRS user in an emergency.
34. **CM#3** strongly recommends that the network for VRS 9-1-1 services be redesigned to allow users to call and connect directly to it rather than reaching a VI at the VIPs as the first stop.
35. **CDBC.VRS-DWCC** strongly recommends that CAV use a fallback option to back up VRS 9-1-1 services in case of a network failure to avoid exacerbating a crisis or an emergency.

Question 6e

Q6e. any other mechanisms established to mitigate operational issues.

36. **CDBC.VRS-DWCC** has no response to CAV's answer to this question.

QUESTION 7

Q7. How has the COVID-19 pandemic affected operations, and what changes have been made to the service's operational processes and delivery?

Impact of the COVID-19 Pandemic

37. It is not surprising that the number of VRS calls increased by about 27% during the 2020 year due to the Pandemic.
38. **CDBC.VRS-DWCC** applauds CAV for structuring and implementing a work program that allows VIs to work from home. **CM#4** said it has made it possible to improve the VRS system significantly.
39. **CM#3** stated that CAV deserves kudos for improving and adjusting the daily operations to support the users, staff members, and video interpreters during the pandemic without negatively impacting the organization.

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40. **CM#10** recognized the enormous benefit of the remote work program, which created a double advantage; meeting the increased call demand while providing economic support to Canadian interpreters who could no longer work in the community due to COVID protocols.

Other Comments

41. **CDBC.VRS-DWCC** supports CAV's intention to allow up to 50% of VRS calls to be handled by VIs working remotely. This strategy would ensure adequate sign language interpreters available for VRS calls and make it feasible for sign language interpreters who already have full-time employment to add VI as a side gig.

QUESTION 8

Q8. Describe the screening and training process for VIs and any guidelines that VIs must conform to while providing VRS.

Visual Accessibility

42. While **CM#10** applauds CAV for establishing standards, policies, and expectations for VIs, they were disappointed with the lack of mention of visual accessibility as part of CAV's response regarding the Video Interpreter Policy Manual list of contents.
43. **CM#10** understands that CAV cannot share certain sensitive information. Still, essential details on visual accessibility are not sharp and should have been clearly stated as a guideline that all VIs must conform to while providing *SRV Canada VRS*. Visual accessibility was not one of the priorities listed in the VI Interpreter Policy Manual contents, and it needs to be.
44. All *SRV Canada VRS*, including Deaf-Blind users, must have full visual access to this essential and valued telecommunication service.
45. **CDBC.VRS-DWCC** says that visual accessibility is paramount professionalism that VIs must adhere to for the best of all *SRV Canada VRS* users, including Deaf-Blind users. Thus, the guidelines must be updated to reflect this.

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Independent Screening Process

46. **CDBC.VRS-DWCC** would like to know more about CAV's standard of "previous experience as either a sign language interpreter or video relay interpreter" on how receptive skills are measured.
47. **CM#3** expressed a desire for VIPs to create an independent screening body of at least five **Deaf ASL teachers** with a minimum of 10 years of experience to evaluate ASL and LSQ VIs and to provide neutral feedback to these VIs to improve their interpreting performance.
48. **CM#4** wants Deaf individuals who are experts in ASL and LSQ to be included in the screening and training processes for VIs to enhance the function of VRS and the performance of Video Interpreters.

Other Comments

49. **CM#10** had experience with specific VIs being unable to understand them and was required to request a transfer to a different VI. They question whether specific VIs were hired simply to meet the "adequate interpreter supply"? The interpreters that struggle to understand the VRS caller make the calling experience frustrating. When the VRS caller is to be matched with an interpreter that cannot comprehend their ASL skills.
50. *SRV Canada VRS* users would like an option in the app not to use a specific interpreter(s) again and have a choice where they click on to request immediate transfer to a different interpreter without explanation.
51. **CM#2** wants to see VIPs establishing Community Interpreter Agencies as an investment in community interpreters. They want to see numerous programs created to increase the number of interpreters in various communities.

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QUESTION 9

Q9. What efforts have been made to ensure gender and ethnic diversity of VIs?

Social Responsibility

52. **CM#10** thought that even though the Commission did not specify any gender or ethnic diversity hiring practices in TRP 2014-187, CAV should still strive to aim for it based on comparable organization size's gender and diversity initiatives.
53. **A person of colour Community Member (CM#4)** expressed that it is necessary to include more IBPOC VIs. Hence, we are an inclusive world without the need to ask for it continually. They said it is the 21st century, so taking charge of this matter is necessary and not making it an afterthought.
54. **CDBC.VRS-DWCC** thinks representation and social identification are critical since we live in a globalized world where various gender identities and ethnicities are commonplace. This must be reflected in the CAV staff and VIs.
55. **CDBC.VRS-DWCC** would like to see CAV voluntarily developing their gender and ethnic diversity policy out of social responsibility rather than waiting to be mandated by CRTC.

Other Comments

56. **CM#10** mentioned personal challenges in securing an ASL for appointments, social events, or any other circumstances that require one, thus acknowledging and not being surprised by CAV's continuing challenges in maintaining an adequate supply of VIs.
57. **A white person Community Member (CM#3)** thought that CAV truly deserves paramount recognition for the continuing growth of IBPOC VIs over the last two years. They said regular VRS users had witnessed those VIs powerfully demonstrating their professionalism and skills during VRS calls.
58. **CM#3** expressed a desire to see an increase of Indigenous and 2SLGBTQIA+ VIs for representative reasons to the Deaf Indigenous and 2SLGBTQIA+ communities.

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QUESTION 10

Q10. Does the CAV employ any Deaf interpreters?

Supporting the Deaf Ecosystem

59. **CM#2** strongly desires to protect DIs' growth and support their opportunities to work within the VRS ecosystem.
60. **CM#4** inquires about how DIs are selected within the VRS ecosystem as there currently are no formal training programs for DIs. They wonder if Certified Deaf Interpreters from foreign countries are recognized and whether experienced (10+ years) foreign Deaf DIs would be permitted to work.
61. **CDBC.VRS - DWCC** recognizes the importance of Deaf Interpreters (DIs) for full language access to a spectrum of Deaf members and fully supports them as an essential part of the VRS ecosystem.
62. According to **CM#10**, it is crucial to facilitate support of the Canadian Ecosystem, particularly for Deaf-owned and run entities. I would like to see CAV providing further support to the Deaf Ecosystem where they are given preferential employment opportunities to level the employment field due to systemic barriers toward Deaf people in public.

Accessibility for Deaf-Blind users

63. **CM#10** is curious about how DIs are provided to Deaf-Blind users who need to make VRS calls for their visual or tactile accessibility needs and wondered if CAV provides a DI upon request.
64. According to **CM#2**, CAV must be fully prepared to provide DIs and Deaf Intervenors for Deaf-Blind individuals. This would ensure their visual and tactile accessibility needs are met.
65. **CDBC.VRS-DWCC** believes that CAV must ensure full accessibility for VRS users, including Deaf-Blind users.

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66. **CDBC.VRS-DWCC** formally requests that the National Contribution Fund (NCF) be expanded to support the cost of Deaf-Blind's accessibility service needs for Deaf Interpreters and Deaf Intervenors for VRS-specific use.

Separation of Roles

67. **CM#3** believes that members of the CAV outreach committee and managers of call centres at VIPs should only focus on their assigned roles and not add DI on the side. **CM #10** think these roles diverge from the definition of a DI and should be focused on their primary professional roles.
68. **CM#3** believes that the VIPs should only hire experienced and certified DIs in a separate and professional role.

QUESTION 11

Q11. To what extent does VRS rely on American interpreters? Has this changed over time? Is it now feasible to employ only Canadian interpreters?

Impact of the COVID-19 Pandemic

69. **CM#10** knows that the COVID-19 pandemic made it possible for CAV to adjust its operations model to allow for a remote work program, which, not surprisingly, led to the recruitment of more VIs due to its flexibility to work from home, resulting in more Canadian VIs being available for VRS calls. This remote system greatly benefited the Deaf Community, ensuring communication equity in the telecommunications industry.

Supporting the Canadian Ecosystem

70. **CDBC.VRS - DWCC** applauds CAV's initiative in striving for 100% of the VIs provided by *SRV Canada VRS* to be from Canada.
71. **CM#10** is impressed with the steady growth of VIs in Canada, from 54% in 2017 to 88% in 2020. They understand that as of January 2022, it is now 100%. It is an admirable feat that has been achieved by supporting our Canadian ecosystem.

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72. **CM#3** prefers to see Canadian VIPs, not foreign VIPs, run the call centres that employ Canadians as VIs, managers, and other professionals CAV contracts to provide VRS services.
73. **CM#2 and#4** are fully aware that all of the VIs are currently Canadian and think it's an excellent system to have as it supports our Canadian ecosystem.

QUESTION 12

Q12. Has the CAV considered interoperability with other jurisdictions' VRS to facilitate international point-to-point calls? If so, what did the CAV conclude or implement as a result?

Investment in New Application

74. **CM#3** wants CAV to invest in a new application similar to Sorenson Communications' Wavello for all MacOS, PAC, and mobile platforms.
75. **CDBC.VRS-DWCC** believes that a Wavello-like app benefits Deaf Canadian users, their hearing counterparts, VIs, and the CAV. This would be a massive win for all parties involved.

Solve the Interoperability Issues

76. **CM#2** firmly believes that IVèS has had video interoperability issues since its establishment. They said the North American Numbering Plan (NANP) covers the U.S. and Canada.
77. While Point-to-Points calls may be shallow at just 1%, **CM#4** says CAV must figure out a way to solve the cross-border interoperability issues to benefit everyone. In contrast, **CM#2** thought this was a disrespectful attitude of CAV towards Deaf Canadians who rely on video calling.
78. There will be considerably more Point-to-Point calls if the interoperability issues are resolved to allow Canadian and US VRS callers to call each other. Also, not forget that some significant hearing corporations or universities have established direct VRS calling lines, ie. Disneyworld, Dawn Sign Press, Gallaudet University, Canadians cannot contact directly.

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79. The VRS Interoperability and Portability Standards were developed by the Task Group of the Session Initiation Protocol (SIP) in the U.S. According to **CM#2**, IVèS failed its interoperability and portability standards. At the same time, nWise and three other U.S. VRS providers have passed them.
80. **CM#10** said that the issue is not the low percentage of Point-to-Point calls but rather the poor choice of platform that CAV, and IVèS, chose.

Communication Equity

81. **CM#10** said that cost must not be used as a rationale to limit access to full video communication and that VRS users deserve complete communication access similar to their hearing counterparts.
82. **CDBC.VRS-DWCC** strongly believes in the importance of communication equity video calling that is equivalent to voice calling and that additional funding must be provided to make this happen.

QUESTION 13

Q13. Demonstrate how the CAV meets the minimum requirements for the VRS administrator, which are set out in Regulatory Policy CRTC 2014-187.

83. **CDBC.VRS-DWCC** has no response to CAV's answer to this question.

Conclusion

84. The emphasis on Increased communication equity is a primary theme in this VRS Review. **CDBC.VRS-DWCC** wants the CAV to replace its current platform, IVèS, with a better-performing quality platform that is Wavello-like and does not have any interoperability issues. The primary focus must be on ensuring video call is equivalent to voice calls.
85. Another theme of this VRS Review is the disempowerment of *SRV Canada VRS* users that must be addressed. Users want to be empowered when it comes to calling interruptions by allowing them greater freedom to choose whether they will accept or decline a VRS call where a VI may need to transfer.

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86. More significant support for the Canadian Deaf Ecosystem is required to level the employment field for DDBHH and enhance the quality of *SRV Canada VRS*. Two ways to do this: grow the number of DIs within the VRS industry and create an independent screening body consisting of experienced ASL and LSQ instructors.

87. **CDBC.VRS-DWCC** kindly requests that CRTC expand the National Contribution Fund (NCF) to cover the cost of Deaf-Blind users' tactile and visual accessibility needs for intervenors and DIs as well as for investment into a better-performing quality VRS platform. The *Accessible Canada Act* clearly states that American Sign Language, Quebec Sign Langue des Signes Québécoise, and Indigenous sign languages are the primary languages of Deaf people in Canada. Therefore, the VRS service for DDBHH needs to improve significantly so Canadian society is genuinely inclusive.

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