

**CDBC.VRS-DWCC Comments to CAV's Answers to CRTC RFI Q14 - Q18:
Topic 3: Service**

This document from **CDBC.VRS-DWCC** focuses on the VRS Services in Category 3.

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Executive Summary

ES 1: Services impact all the VRS callers, including the Deaf-Blind and Indigenous that can use it, and includes 9-1-1, Customer services, notifications, and alerts.

ES 2: Indigenous Deaf team members feel that CAV should have done more to reach out to those in the remote areas of Canada to expand on the numbers of VRS callers, and CAV can do more to increase accessibility for these populations. Limiting the service provisions to downloading the VRS app leaves out entire Indigenous communities, as most of them use public spaces for their internet needs with the lack of connectivity in remote areas. Therefore, they would benefit from a link available through the internet browsers to open in public spaces such as libraries, community centres, and band offices.

ES 3: Accessibility must be paramount to the full range of potential ASL and LSQ video callers. All the Deaf-Blind individuals who participated feel that both 9-1-1 and 9-8-8 are essential and that they should be easy to find on the VRS application. If they are to be buttons on the app screen, they must be in distinguishably different colours and easy to locate.

ES 4: Deaf-Blind individuals wish for more chatbox options for accessibility; they find it hard to locate the chat box and that this same chat box has connectivity with braille for Deaf-Blind accessibility. Additionally, many Deaf-Blind cannot find the Chatbox; it is too small as the chat box is collapsed on the screen upon call initiation. Thus, instead, for the sake of accessibility, the chatbox should be expanded on call connection and then let the callers collapse it by choice. The same Deaf-Blind callers cannot find the Video Interpreter ID# to be able to report a situation with Customer Service.

ES 5: Suggestions to improve geolocation for 9-1-1 and possibly 9-8-8 purposes, hour expansions of Customer services, three people to be in a video relay call, automated self-announcement switch choices available for the call initiations, and auto-saving the VI identification numbers. Furthermore, this suggests improvements for notifications and alerts.

ES 6: Other persons, including Deaf-Blind, wish, for easier reference, for the autosave of the transcript of the call that also saves the VI ID# in Call History, as that information is lost immediately after the call is disconnected. This is also a benefit for the Deaf-Blind, who often cannot see the VI ID#.

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Methodology

1. A total of seven Committee Members (CM) participates in commenting on this category of Service, and each member has been assigned a number. It is their wording below that they contributed. The following seven Committee numbers participating in this Response are **CM#1, CM#3, CM#5, CM#8, CM#12, CM#13, and CM#14.**
2. To create a flow between the questions, one Committee member consultant pulled all the answers together and tied up the response for each question, summarizing the answers together for each question in the same numbered Response (R#). The ordering of the CM comments is not necessarily in numerical order, but instead of relevancy and flow to the perspectives of CAV's responses to these questions.

General comments

3. Overall, the **CDBC.VRS-DWCC** provides perspectives from specific views of the Indigenous, Deaf-Blind, and general Deaf and Hard of hearing comments on the VRS Services responses the CAV gave in their replies to the CRTC's queries.
4. VRS Services are central to the success of the provisions of the video relay services and cover a whole breadth of issues ranging from 9-1-1 to identifying the Video Interpreters (VI).

QUESTION 14

Q14. Explain how VRS complies with the minimum service requirements in the Regulatory Policy CRTC 2014-187.

- a. **Please provide specific details about how 9-1-1 calls are handled and any limitations associated with 9-1-1 calls, including the provision of the caller's address, and identify what, if anything, has been put into place to mitigate these limitations.**
- b. **Describe how a VI is instructed to handle a 9-1-1 call, including how the VI facilitates communications between the first responders and the caller and the guidelines for establishing when the VI terminates the call.**

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5. **CM#1 comments:** "CAV mentioned that they need to upgrade the 9-1-1 calls when there is no Wi-Fi available. The screen gets blurry, and the VI could get frustrated and impatient.
6. The location must show the geolocation and adding more than one address in the VRS setting would be great.
7. Some Deaf callers are guests in another city/town and may not know where they are. It would be best to ask where they are."
8. **CM#1 comments:** "It would be an excellent approach to remain calm and be professional to guide the Deaf caller when they are in a distress situation. The dialogue between the VI and the Deaf caller should go like this:
 - a. What is your name?
 - b. Ask where the caller is for their location.
 - c. 'How can I help you?' and then ask:
 - d. What service do you need: Police, Ambulance, or Fire?
9. Before the conversation ends, they need to check to ensure everything is OK before they hang up.
10. VIs should check when the responders arrive and then allow the caller to go but also be prepared and offer the choice where the caller may prefer to have the VIs in the ambulance until the hospital with the interpreter in person.
11. The option should be possible to continue with the VI until the live interpreter arrives."
12. **CM#1 comments:** "CAV made enhancements by adding more services 24 hours a day, seven days a week, and 365 days. This upgrade and service improvement worked out well because it is what the Deaf communities need.
13. I would recommend adding another Customer Service for the VRS platform in western Canada since CAV appears to rely on the eastern Canada hours, which is limited to those who reside in the West, their needs since the time zone is in 3-hour different from Pacific Time. It would be great to have Customer Services open from business hours from 8:00 am to 8:00 pm Pacific time.

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14. On the other hand, this would be an excellent opportunity to offer the job positions for hiring DDBHH to be part of the CAV for those who reside in western Canada. The observation is there is East-centric hiring and preference for people in the East to be hired rather than those who live in the West, with only one person we know that lives in the West on CAV's staff." (Update: now there are two of them).
15. **CM#1 comments:** "The features in the VRS users setting need to be upgraded and enhanced as there are currently limited options for the VRS user's app on its mobile. Here are some examples:
 - a. I tried to fix my account and wanted to change my personal information, such as Birthdate and other information, and clicked 'Save.' The screen display says, "A problem occurred; please try later." Therefore, I cannot update my personal information."
 - b. "There needs to be a way to prevent getting interrupted by a FaceTime notification on a MacBook during the middle of a conversation with the VRS, and it suddenly disappeared and disconnected from the VRS on a different device from a laptop. This notification needs to be repaired to identify how to prevent this in the future."
 - c. **CM#1 comments:** "Another enhancement to consider is to save the conversation before hanging up with the VRS VI. This conversation is still an issue when trying to keep the dialogue and the VI's ID number. It would be best to save it automatically rather than copy and paste it before hanging up. Often the interpreter may hang up quickly, and the ability to do this disappears with the call hang up. There needs to be automated saving of record of the call and the VI# at a minimum.
 - d. Canadian VRS users would love to have another enhancement of the 'All View' to have two screens for the VRS users and hearing users see each other and the VI. This 3-way is one most recommended by the Deaf communities. The feature already seen on Wavello in the USA is what we need.
 - e. The last feature suggested is a button or switch for a 'self-announce feature' for the VRS users in their calls, as they mentioned that this self-announce feature would be expected to be available in 2021. It is 2022, and it is not yet available."
16. **CM#3 comments:** "The incoming calls should reach the 911 calls directly to the VRS 911 services, instead of having the calls get the regular VIs who have to transfer their calls. The designated calls come in separately to designated 9-1-1 VI's.

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17. CAV should configure the network for the VRS 911 so the 911 calls can reach the VRS 911 services directly. In addition, CAV should add the fallback option in case of an unexpected network outage during crucial times.
18. The GPS and WLI should be added permanently because they are so critical for the VRS that 911 calls to are quickly pinpointed.
19. To educate about how VRS 9-1-1 works, I would recommend the CAV develop detailed educational videos including a few scenarios to show to use it :
 - a. Training videos for the VIs
 - b. VRS users.”
20. **CM#3 comments:**” I would like to see the CAV develop the VRS 911 guidelines with several stakeholders and a focus group.
21. **CM#5 comments:** “14a. “
 1. The geolocation is not enabled if a 9-1-1 call is made on a computer or tablet, which stresses the caller in an ongoing emergency in having to tell where the emergency address is continuing.
 2. The geolocation is enabled on smartphones, yet the caller does not always know the facts.
 3. Recommendation: geolocation can be enabled on all devices.
 4. State geolocation in emergencies in agreements clearly, and users understand and agree to permit geolocation use in 9-1-1.
 5. Additionally, users need to be informed that they can leave the smartphone open if the user cannot communicate with VI due to extraordinary circumstances.”
22. **CM#5 comments:** “14b.
 1. On the computer and tablet, the VI stays with the caller until emergency responders arrive and continue communicating with emergency responders until the call ends.
 2. On the smartphone, the VI stays until emergency responders yet are not guaranteed continued communication with emergency responders upon arrival of location.
 3. Recommendation: Same consistent service with VI with all devices with emergency responders in communicating vital information about the patient for best use of care until the caller and VI agree to end the call.

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4. Best practice, and the preference, is if the caller acknowledges or wants the call terminated, rather than VI or first responder. This gives the caller more control in this urgent situation. Empower the VRS caller with the decision-making.”
5. **CM#5:** “However, if for some reason the caller is unable to communicate due to a medical emergency (blackout, in extreme pain or non-responsive), the VI has a responsibility to inform the first responder that the caller is a Deaf or a hard of hearing person. Then, First responders must relay that same information to medical or police personnel. This would help the personnel contact a medical services sign language interpreter, or if not available, a VRI setting needs to be ranged and set up.”
6. **CM#5:** “It is critical to ensure everyone communicates what is happening. Conveying correct information and procedures is important to the callers or the injured party and to be included in knowing what is going on rather than be confused or in fear in emergencies. The use of VRI is not enabled on the same CAVRS app, and users need to be made aware that this is a different service.”

Deaf-Blind

23. **CM#13:**

- a. "I am Deaf-Blind with one eye Blind. Yes, I did call 9-1-1 through the VRS interpreter for the first time in October 2017, when I broke my ankle from falling; very painful and very heavily dizzy with my one good eye to be able to talk with the VRS interpreter patiently. I called 911 through a VRS interpreter. The 911 callers say that VI told me that the call was transferred four times to be right one while I had a very, very painful and with my broken ankle at home about 30 minutes to finally through 9-1-1 callers to keep me awake and heavily dizzy.”
- b. "No one taught me about using 9-1-1 on the VRS app. I used my iPhone VRS interpreter through 911 callers. I did not know that any tablet like an iPad, iPhone, or computer for updating address or any information on VRS account for 911 callers will look and hear people who call any cellphone will have a location for fire, police, ambulance to the right place.”
- c. “Yes, I believe that CAV needs to set up GPS for VRS Callers for Deaf-Blind because it is hard for Deaf-Blind if they have fuzzy eyes, dizzy, or something serious seizure or something. I think both are best accessible or improving tech for Deaf-Blind use GPS and text 9-1-1. It also varies if the call is outside,

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and it could be tough to see a VRS interpreter with the sun outside only if the Deaf-Blind has enough data. I feel GPS locating is important for the VRS callers in case of emergencies." "I believe it is crucial to have special training for 9-1-1 calls."

24. **CM#13: f&g** - "In my experience when I had my ankle broken. VRS interpreter talked through 911 callers during questions and answers etc. While the VRS interpreter explained that the VRS Interpreter would sign off when the ambulance arrived at my home, and that is exactly what happened, as soon as the ambulance arrived, the call ended with the Video Interpreter."
25. **CM#13: h**. "I suggest for 911 callers to be aware that will be not happened my experience again like four times transfer to right one 911 call on through VRS Interpreter to keep waiting until getting the right one. For my image challenge, it is the most significant situation for Deaf-Blind. They have various complete blindness or can depend on how much they can see, little or so-so, etc. If one person had a severe seizure would not be able to communicate with the VRS interpreter through 911. Or imagine what other challenges for Deaf-Blind."
26. **CM#14 comments:**
 - a. "I have never experienced calling 911 through VRS before. I will use an image to sight if the situation in a scene where I see a person might be sick or a bad hurt. I will use VRS for 9-1-1 to clarify and describe what happened in the scene or a person. VRS will make my communication easier and smooth."
 - "b. I wish CAV or even the DWCC could provide a workshop to introduce VRS for 9-1-1 on the PowerPoint so anyone will learn and use it in the same small town in British Columbia.
 - c. (1) That would be nice if someone is willing to teach me what to do with 9-1-1 on the VRS so I can share with other Deaf people in the other small towns near me.
(2) I forgot to notify VI of my new home address - I will do it asap.
 - d. "Yes, it would be a good idea for CAV to suggest adding the GPS for VRS to inform the E-Comm office where I am exactly located."
27. **CM#14 comments:**
 - a. "Yes, I feel that VI needs to have special training to ensure a proper meaning or ask exact specific where hurt left or right side before informing the E-Comm operator because some VI didn't take medication courses or join the job as medical interpreting services when they joined as a VRS interpreter. "

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- b. "I think VI should ask the caller to check and see if there is anything to add, or that's all before they say goodbye before signing off.
- c. It's crucial for Deaf callers to wait until the first responder arrives or tells them to sign off. That is some way to help Deaf caller to control calm down. I wonder VI can chat a bit with the caller for a short while with the responder on the line or talk with a person to keep the communication going while conscious."

28. CM#15:

- a. "I have never used 9-1-1 for VRS.
- b. Nobody has told me or shown me how to use VRS for 9-1-1 purposes.
- c. Yes, I am aware of the location information through an interpreter who informed me about this as I was not aware of this at first when I first used VRS. They just checked with me about the location and address as I was surprised and wondered how they knew. That is how I found out."

29. CM#15: "As a Deaf-Blind person, I have one experience when I accidentally dial 911 on my mobiles and do not have access to VRS or text 911 at this time. I tried to hang up and stop, but they kept calling me as I could not hear. At that time, I was on the bus heading to work. About three hours later, the police arrived at my work to check on me. I go to my apartment and find I am not there, then try to contact my parents and find out where I work, then go to my work to check on me. I felt the police valued me; this is an example of why it is important to have a GPS with VRS."

30. CM#15:

- a. I am not sure, but I think it is best to go to those who have training in this field. The interpreter should wait for the Deaf to hang up. Yes, the VI should wait for the first responders."

Other

31. CM#8:14a "911 calls will be a priority over other calls. The limitations may be possible if the interpreters are not available asap and for some reason can't cut other phone calls because in reality and comparison, hearing people do not have their call cut when someone calls 911."

32. "Deaf people will have to put down their address when they register for VRS, so it will be easy for 911 dispatchers to find them, but if they are at another location, then they will have to tell where they are."

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33. "My interpreters told me once if a 911 call shows up, then they will have a second person to sit beside the interpreter to ensure that interpreter receives all the information. The limit was that if the Deaf was overwhelmed and they could not make any sense, the interpreters, if working alone, would be lost and misunderstood, which is why it is critical to have a team working together on each 9-1-1 call."
34. **CM#8: 14b.** "When first responders arrive, Deaf people can use VI to communicate with them until they come or refuse to go to the hospital. In this situation, a VI will help communicate between first responders and Deaf people because sometimes Deaf people are overwhelmed and have difficulty communicating with first responders. It will be helpful to have VI so they will have the freedom to tell what they need and want so there will be less misunderstanding and less harm."
35. Therefore, there must be VI for people who use VRS for the 911 calling period because it can be a life-or-death matter. No Deaf people deserve to lose their lives due to misunderstandings. Especially since most of these Deaf people might not have good English (or French) grammar, including myself, even if I have a university degree, honestly, if I were in an emergency, I would use my first language rather than English as my second language."
36. **CDBC.VRS-DWCC** recommends that even on the VRS website, there needs to be a clear definition and description of the differences between VRI and VRS to help those unfamiliar with the distinction between the two communication technologies.

QUESTION 15

CDBC.VRS-DWCC Committee Member Responses to CAV's Answers to Q15:

15a. How has the CAV incorporated user feedback into its plans for enhancing VRS?

37. **CM#1:** "CAV uses the approach of having the Outreach to gather the DDBHH feedback. This does not sound like CAV does have a network with the Deaf Grassroots, which mentioned that they had 250 in-person outreach events. CAV could have done better by hiring those with more and better community connections."
38. My last question is, why have efforts not been made to share with the Indigenous DDBHH communities, especially in remote and rural areas?

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39. Subsequently, **CDBC.VRS-DWCC** recommends that CAV hires Indigenous DDBHH community members to assist staff with outreach events and create a video-based CAV Connect Program to keep Outreach staff and community members safe while continuing to provide outreach and in-reach for users.
40. **CM#5:** "I am unaware of what enhancements CAV had made for the VRS beyond the minimum requirements. I am not aware of its plans for further enhancements either.
41. However, I believe that User feedback in all aspects of the CAVRS app is essential for continual improvement of the service. The consumer feedback service does not need to be under the CAVRS app and is instead placed at a neutral party where there are no financial or personal conflicts of interest.
42. The users are aware that there is only one national VRS service in Canada, CAVRS, and it faces no competition from for-profit VRS companies, so the importance of neutrality needs to be emphasized in using feedback from the users somewhat in its plans; enhancements."
43. **CM#8:** "Since there is only one option for VRS, and I know that some Deaf people want more choice to use what service they want as the USA has Purple, Sorenson, Convo, and ZVRS, so they can choose their preferred VRS user. So maybe in the future, more options may happen for them."
44. CAV said they got little feedback from Deaf users as smart watches signaled that they receive a call through VRS, and CAV will work on it. CAV will also design CAV mobile apps to make them look better. CAV also will work to see if they can cause hearing and Deaf callers to see each other, which will be called "all views," so it is in the process right now, and I am pleased to see this."
45. **CM#8:** "I observe that the CAV is set up 24/7 for VRS users, and it is lovely because Deaf people can have time to call after work instead of calling during work hours or taking a day off to make a call.
46. In my case, I work from 7 am. to 530 pm, and If hours are still 8 am to 8 pm, it will impact on Deaf who work because they will have limited time to make a call. Also, Deaf people like to order pizza after 8 pm and will not be able to call a pizza place, and they will have to use online order, and sometimes online order will not have opinions about what they want. It is very beneficial to have 24/7 VRS services."

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47. **CM#8, Question 15, item 3b - Youth accounts:** "It's nice to have a youth account but need permission from parents/ guardians. I agree with youth to get an account because they will be independent without relying on hearing people make a call for them."
48. **CM#8, Question 15, item 3g - live chat for people who need help with VRS issues:** "I noticed on Facebook that people keep complaining that they have no way to contact customer service when they have issues. It happened many times. I wonder, do they know about the live chat feature? If not, CAV should make it easier for people to find the information if they need to chat with customer service."
49. **CM#8, Question 15, item 3i - call announcements:** - Sometimes, Deaf people do not want an interpreter to announce that they are deaf to hearing callers. The CAVRS recently changed this a few months ago, and now interpreters do not have to say to the hearing caller that they are interpreters for Deaf clients. That's good because I know some Deaf people do not want to label themselves as deaf over the phone for their reasons. ``
50. **CM#8:** I'd like to share my experience; when I was in school in the USA, someone called me by the wrong number because he wanted his test result from his doctor. So out of genuine concern, I called him to let him know that he had the wrong number, but he ended up hanging up because the interpreter told him that a Deaf person had called. He might think my call was a scam, but I just want to let him know that he just has the wrong number so he can find the correct number and get his result from the doctor. It was a serious situation!"
51. Furthermore, **CM#8 comments:**" Overall, my experience using VRS has always been positive. In January 2022, I hurt my shoulder and chatted with my family doctor through VRS. It was much easier than going to the office and booking interpreting or using my mom as an interpreter. My doctor gave me the correct information on my accommodation for work."
52. **CM#8:** Since Covid-19 started, most doctor appointments were by phone, which makes Deaf Canadian's life easy because they do not need to reschedule an appointment due to a lack of interpreters to save their time on travel costs such as gas, bus, etc. If there were no VRS during those times, they would have to use TTY to communicate, and most of the time, Deaf people do not have good English skills, which can lead to misunderstanding. Therefore, the services for VRS do benefit Deaf people."

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53. **CM#3:** "No additional comments; the others covered the perspectives to the answers well."

QUESTION 16

CDBC.VRS-DWCC Committee Member Responses to CAV's Answers to Q16:

Q16. Describe the features and ancillary services available to VRS users, including call alerts, long-distance calling, conference calling, sign-language "voicemail," voice carries over, and hearing carries over. The description indicates which services are available on which platforms.

54. **CM#1:** "I keep missing the VRS calls because of the problematic call alert notification settings. The features need to be improved for call alerts on all devices."
55. "GPS and Wireless Location Information still need to be updated as the latest devices are already ahead of us with WLI information; CAV needs to catch up to the latest technologies."
56. "Point-to-Point calling is a great way to start a conversation with the VRS users. However, the point-to-point calls do not have a good quality of the video as it keeps getting blurry when the users are trying to have a conversation. It keeps getting choppy and freezing. This feature needs to be looked into to find ways to make this quality of live video clear, similar to FaceTime."
57. The lack of attention to the user-to-user feature is disappointing for the DDBHH VRS callers as they thought this would be great to use for no charge on VRS calls while on the wireless network, which was advocated mainly for by the DWCC. Accessibility plans offer new data limits while using the SRV Canada VRS platform. All the wireless service providers provide this. Therefore, there needs to be a more significant effort by the CAV to encourage callers to use point-to-point calls.
58. It is recommended to improve point-to-point usage and increase the advantages of making these calls on the platform."
59. **CM#3:** "I believe that the CAV should stop promoting Embrava Blynlight products to the users because the cost of about \$110, including taxes on the product, maybe a burden to some of them who are mainly living on the poverty line or social welfare. They need the money to cover their basic needs, especially food."

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60. Instead, I strongly suggest the CAV consider an investment to provide the free products to their users who may ask for them should the CAV receive an increased budget of 45-60 million dollars through the National Contribution Fund (NCF) annually.
61. The rationale is that across the border, several American VRS companies provide free similar products to their clients; therefore, the CAV can follow their contribution as a good example. Tech support can hook up the strobe light flashing devices on HDTV besides the TV, laptops, and personal computers, so the flashing while being called on the app easily catches the attention of the users in front of their TV. Most American VRS companies are offering them to their users; therefore, it would be wonderful if the CAV offered the same product.
62. The apps on Windows and Mac OS can be easily modified by the developer(s) by enlarging the popping up calling window three times and centering it in the center of the screen.”
63. **CM#5:** “The call alerts have been problematic due to no flashing lights or vibrations on the smartphones (in my experience) forcing hearing users to leave a sign-language voicemail. It is easy to miss the sign-language voicemail if one does not check the app or email and causes a delay in responding to calls.”
64. **CM#5:** “VI’s needs to make it clear to hearing callers that they can leave a sign language ‘Voice-video’ mail rather than the hearing callers just give up and hang up. Deaf users want and need to stay connected equitably with the hearing community.”
65. “Long-distance calling for the cost is tricky because the VRS service is free for all users, yet does long-distance use up data on smartphones? What are the considerations for using VRS on the app while on data out of the country? CRTC needs to consider: Is it equitable, and if not, how to measure it due to accessibility needs of the Deaf/hard of hearing callers?”
66. **CM#5:** “Conference calling on smartphones may not work well due to the screen size vs. the computer and other tablets. If it is available as an additional feature, then CAVRS must make this possible.”
67. Voice carryover is an excellent feature for hard of hearing users, and the component needs to stay in the app.”

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68. **CDBC.VRS-DWCC** believes there should be no limits on conference calls as that would make a difference in whether a Deaf person gets a job in a job interview. Putting limits on conference calls and business meetings hamper people's opportunities. CAV needs to be considerate of the detrimental impacts on VRS caller lives. Jobs are at stake; professional opportunities are at stake.
69. **CDBC.VRS-DWCC** believes that there should be no burdensome additional costs of those features placed on the users, especially those features that give the Deaf/HH users a fair level playing field. If there are need improvements in those features to make it more user-friendly for all parties, so be it.

QUESTION 16A. 16B

Q16a. Are there any costs to users or additional requirements for these features and services? If so, elaborate. b. What are the limitations of these features and services, if any? If so, elaborate.

70. **CM#1:** "Without competing technologies, Canada's VRS is very basic and with the advent of the new technologies available out there, with Wavello (Sorenson) and *Convolink* available, there must be more features to look at, to offer for Canada VRS.
71. Something similar to *Convolink*¹ is a must for the Indigenous in remote locations, as this type of option does not require downloading, and therefore would allow for Indigenous to go to common areas where there is internet available, such as libraries or community centres to open their VRS account and make calls."
72. **CM#1:** "On the other hand, Sprint (US) increases accessibility for mobile communication for DDBHH by providing bundle packages that include and ensure there are visual and vibrating alerts features on the mobile."
73. We want to see more features on the devices to increase accessibility for the DDBHH Canadian VRS users so they can have more choices for their needs."
74. **CM#8 - 16a:** "There is no additional cost for people to use VRS and they will need high-speed internet that is all that they need for VRS."

¹ Convolink - <https://convorelay.com/convolink/>

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75. **CM#8-16b:** "I think the limitation is that some people cannot afford high-speed internet because of their low income, and they have other things to pay for instead of high-speed internet."
76. **CM#8-16b: item 5: the conference calling feature.**" This is interesting because I believe they should have a 3rd caller just in case they need a third person for good reasons such as family discussion plans. Hearing people can have a 3rd caller or more than that, and where are our equal rights as hearing people?"
77. "Also, I know there are many Deaf people who do not fill out surveys for VRS, and we will never know if some want a 3rd caller or not."
78. **CM#8-Voice carry over:** "There are other service names Video Carry Over (VCO). "This service focuses on Deaf/Hard of Hearing people who speak for themselves but use ASL or LSQ interpreters to interpret what the hearing caller says. This is and will be helpful for people who would rather speak for themselves without using signs, but they still have access to see what the interpreter said, and they will not be lost and miss the information."
79. **CM#8- Point to Point calls:** Many people do not use point-to-point calls because there are many other service variables such as facetime, skype, zoom, and Facebook chat. In my experience, I use other services than point-to-point because I was used to those services, plus I also used those services a long time before VRS was set up. It was my habit and hard to change."
80. **CM#8 - Chat Live on the mobile app:** It is good that CAV will set up chat live on a mobile app. I know some Deaf people do not have laptops, and they heavily rely on phones because they can't afford the internet bills; the Deaf users will use wifi when they are out at the library or malls, etc. So I am happy to see that CAV set up a live chat feature on mobile because it will benefit everyone. I have not had a laptop for a few years because I don't need a computer until I start my classes. Even at work, I do not use a computer, and I only use my phone during break time; if I run into a problem, I will want to use the live chat feature on my phone during my break to fix issues. I finish work at 5:30, and I get home at 6 pm. That is when customer service is closed. It will be impossible for me to reach customer service, and the Deaf in Pacific time will see customer service close at 3 pm. It will be impossible if they work at the same company I did in Ontario because my shift is from 7 am to 5:30 pm. Again, a live chat feature on mobile will benefit everyone!"

CDBC.VRS-DWCC Comments to CAV's Answers to CRTC RFI Q14 - Q18:

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CDBC.VRS-DWCC Committee Member Responses to CAV's Answers to Q17:

QUESTION 17

Q17. Describe the technical requirements for users of the service, including platforms supported and bandwidth requirements.

81. **CM#1:** "No comment."

82. **CM#3:** "We thank the CAV for providing the precise, detailed, crucial technical response to question no. 17 and the answer for us to be aware of their technical requirements for providing the services.

83. Since the launch of the CAVRS, the technical capabilities and features of the Internet connections, resolutions, and networks have adapted unstoppably and rapidly with these points below:

84. Today many Internet Service Providers (ISPs) have offered their Internet service packages with higher bandwidth speed with much more extensive data to their customers.

a. The 5G mobile networks that the major telecommunications companies and their subsidiaries provide rapidly expanded across Canada over the last few years.

b. The resolutions on personal computer monitors, laptops, and mobile devices are 1024x768 or higher.

- Many non-OS apps are now interoperable and scalable and no longer proprietary.

85. In addition, we need to be aware of the network jitter level, which is congestion generated by millions of internet connections—tiny packets of data trying to use the same IP network—all active simultaneously. It can cause troubling connections, which lead to scrambled video live chat or message, losing or slowing virtual interaction between the users and the VIPs, and unforeseeable issues such as personal routers or Internet devices.

86. To read more information on the network jitter, this link:

<https://www.dnsstuff.com/network-voip-jitter-guide>. Moreover, The reader can find the comparison between jitter and latency in this link:

<https://www.atatus.com/blog/jitter-vs-latency/> "

87. **CM#5:** "I am not familiar with the technical requirements for the users of the services, including platforms supported and bandwidth requirements. I know that

CDBC.VRS-DWCC Comments to CAV's Answers to CRTC RFI Q14 - Q18:

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the CAVRS app requires stable, consistent, and enough bandwidth for upload and download speeds to have high-quality videos for all users. This adjustment means CAV must constantly update the technical requirements to keep the app going. “

88. **CM#8:** “The technical requirement is to make sure that the video is clear and people can see the interpreter more clearly instead of blurry and frozen.”
89. **CM#8 - further comments:** “I notice that the quality of video when I use VRS to call my family doctor tends to be good and clear on my phone. I prefer to use my phone because my phone is a Google Pixel 6 and provides clear video. I know that some phone companies do not charge people for using VRS as internet speed. That is good news. Also, phone companies provide unlimited internet packages for cell phones right now. This will benefit the Deaf to use as many VRS calls as they want without draining their internet data limitations.”
90. “It will be nice if phone companies provide a good deal for Deaf with low income so they can make a VRS call with a good quality phone instead of a cheap one they can afford. I suggest that phone companies work with the Deaf with low income to ensure they get the best phone they can. I know some phones are not good with VRS because of the quality.”
91. “I know my laptop is not the best for video calls because sometimes it is frozen and blurry when I chat with my friends on Facebook. I never use VRS to call someone on my laptop because I know my laptop is low in quality; I will blame my laptop's issues instead of VRS. I have no comment on using VRS through a laptop because I never use VRS through a laptop, only my phone.”
92. “Improve light conditions and make sure that everyone can see the video without struggle. I know some people have difficulty seeing what the interpreter said because of the background. Therefore, VRS must improve their lighting conditions.”
93. “VRS should not suddenly shut down on a person if they are making a call. It happened to me once during my interview. I even saw it with my own eyes a few days ago. My friend/coworker got a call from his doctor, and VRS suddenly shut down on him. He has to wait until the doctor calls him back. Our break is only 30 minutes, and time is minimal. My work does not allow us to use the phone at all. If we do, then we can lose our job.”

CDBC.VRS-DWCC Comments to CAV's Answers to CRTC RFI Q14 - Q18:

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94. "To be honest, I feel that VRS is not the main problem; the problem is the accessibility to high-quality phones and the internet. Also, fix it to make sure not to suddenly shut on a person when they make a call because you never know what kind of phone call they are making, for example, a job interview."

QUESTION 18

CDBC.VRS-DWCC Committee Member Responses to CAV's Answers to Q18:

Q18. Describe any technical limitations of VRS and the reasons for them. What would be implemented to allow VRS users to use these numbers? For example, explain why users cannot make VRS calls to numbers like 2-1-1, 3-1-1, 5-1-1, 6-1-1, and 8-1-1. Would you be able to provide any advice on how a proposed 988 suicide hotline number could be designed to make it accessible to VRS users?

95. CM#1: "Currently, the CAV is focused on 10-digit telephone numbers, and they have concerns about how to manage these calls from the platforms and how to promote the information related to the FAQs on Facebook and CAV's website. It would do CAV greatly if it looked outside of Canada to see what is possible and available and adopt a similar model in Canada."
96. CM#1: "It should be technically made possible to use 3-digit calling for emergency calls through the VRS provider. Ofcom made the 999 BSL line possible for those that use British Sign Language (BSL), and it is inspiring to see all the possibilities! On June 17, 2022, The provider launched such a service in the United Kingdom (UK), where it was finally added and made possible to make 3-digit calls for Deaf communities. It makes calls that much easier."
97. **999 BSL** is the **UK Emergency Video Relay Service** where Deaf users have equivalent access to emergency services and announced the free 24/7 VRS for BSL users to call #999 emergency via mobile and website access.
98. In the Deaf communities in Canada, we would want to have this similar set up to have direct emergency service just like 999 BSL by allowing DDBHH people to call directly through an emergency video calling service, allowing them to communicate in their preferred language, ASL, LSQ or even ISL."
99. **CDBC.VRS-DWCC** brings to attention, in response to CAV's reply and the CRTC's query, that in the States, there are over 40 direct hotlines set up in ASL for Deaf, Deaf-Blind and Hard of hearing Americans. The DWCC did extensive research concerning 9-8-8 and emergency services for mental health and suicidal prevention

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in its Reply Comments in TNC CRTC 2021-191; see the [link](#).² The document provides an excellent Appendix of resources that are relevant to this question.

100. It is **CDBC.VRS-DWCC's** view is that to achieve communication equity, Canada needs to create a fund to establish a direct hotline for mental health and suicide prevention to reach ASL and LSQ users.
101. **CM#3:** "CDBC.VRS-DWCC strongly believes that the CAV must provide VI services to Deaf people who are seeking emergency counselling services to the 24 hours services mental health services through 988 for a few reasons:
- a. The Deaf and Hearing Mental Health and Counseling Services across Canada do not have 24 hours emergency services available for Deaf people seeking help.
 - c. Access to mental health help services, part of health, is one of the fundamental human rights worldwide; therefore, Deaf clients have a right to access 24-hour mental health help through 988.
 - d. Why can deaf clients not access their services without being able to reach 988 through the VIs while hearing people can? It is a considerable disadvantage against them.
102. I think the CAV must create and develop training materials on Deaf individuals, VIs, their staff, and the 24 hours mental health hotline.
103. **CM#5:** "I am not familiar with the technical limitations of the VRS with making calls such as 8-1-1. However, the proposed 988 suicide hotline advice is already written in the other proceeding (TNC 2021-191).
104. Yet now, the more I think about it, it is possible to put the 988-suicide hotline in the CAVRS app in the same context as 911. The reasoning behind this is to be as user-friendly as possible. The VI 's need to be trained separately for such a hotline, and it can include Deaf adults also trained in handling suicide or mental health emergencies.
105. Callers would choose to use ASL-LSQ video 988 call or use 8-1-1 text for privacy reasons. This is imperative because the current pandemic has increased much awareness of the care of mental health. Unfortunately, some Deaf persons did not have access to much-needed services and committed suicide.
106. **CM#8:** Deaf people have a right to have an equivalent experience with phone calls as hearing people. Three-digit codes are beneficial because people can make a call on any issues that they have.

² [DWCC Reply to Interventions TNC 2021-102](#)

CDBC.VRS-DWCC Comments to CAV's Answers to CRTC RFI Q14 - Q18:

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107. **CM#8:** "Deaf people can't make calls to 2-1-1, 3-1-1, 5-1-1, 6-1-1, and 8-1-1 because every province has different numbers rep for various services. When the Deaf make a call, somehow, they get other interpreters from a different province. The call is made to the interpreter's location of the Deaf persons. Now CAV is working on ensuring that suicide hotline is accessible to Deaf people."
108. "I agree that Deaf should have equal access as hearing people even if CAV disagrees. Deaf people should have the right to hear people make any kind of call they wish to. The suicide hotline **MUST** be accessible because it's a matter of life and death. Maybe Deaf people do not want to end their life but just need little support, and it could save their lives instead of Deaf feeling so down without any service and choosing to end their life. Since some areas in Canada, it's hard to get an interpreter for mental health issues, so call to suicide hotline so they will have full access when they make a call with an interpreter."
109. 3-1-1 is for receiving my area's garbage collection and snow removal services. Those numbers are significant because Deaf people have the right to ensure their garbage is gone and the snow is removed.
110. For Deaf senior citizens, if there is too much snow, they will be stuck at home and miss their appointment because there is no other way to call.
111. 2-1-1 is very important because it provides access to people's needed services, such as ESL classes, financial assistance programs, health clinics, or counselling services. That is important because Deaf people will need those kinds of services, and if they have no access, these patients will be stuck. Therefore, Deaf people must have **EQUAL** access to hearing people.
112. Three-digit code 9-8-8 is critical because it could be a matter of life and death. The suicide hotline **MUST** be accessible, period, because I do not want to see anyone end their life because of no access to help. Deaf people also have the right to receive equal service as hearing people when they need help.
113. There is good testing on those services, so let's hope that CAV or CRTC will approve those services."

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Deaf-Blind

114. **CM#13:** "While I know 9-8-8 is important (after reading about it), for me, it is easier to know 9-1-1 than 988 because it is straightforward to confuse which one. It is my first time learning about 9-8-8 and 8-1-1. I didn't know either was an option. My concern is how to make it easy for Deaf-Blind to identify the difference between the 9-1-1 and the 9-8-8 buttons. CAVRS should problem solve to deal with mental health emergencies, especially in the case of Deaf-Blind. It is my sincere opinion they should not delay or postpone. I am surprised and shocked it is not, and I am fearful as I imagine when a Deaf-Blind needs someone immediately help with 9-8-8 during COVID-19 times. It is crucial."
115. **CM#13:** "It is my sincerest concern that the Deaf-Blind can distinguish between the 9-8-8 and 9-1-1 buttons in the VRS system."
116. **CM#13:** "**I would like to suggest that CAV improve the VRS service to be better and accessible** for Deaf-Blind to be comfortable to call 9-1-1 in an emergency; they have the right to independently access 9-1-1 in what way they choose, including VRS. CAV must improve the chat box in the VRS platform to have larger text and the capability to connect with braille machines. Deaf-Blind need to be assured they can afford the wireless and internet costs to access 9-1-1. Funds and assistance must be made available for Deaf-Blind to access telecommunications in Canada."
117. **CM#14:** "I strongly recommend VRS to add to set up to deal with Mental Health Emergencies of all ages to provide access for a Deaf person with mental illness. This is critical, especially for those who might have missed taking their medication or other issues (suicidal). It is crucial to have VRS ready online to communicate before the responder arrives, in the extreme cases with mental health emergencies through the new 9-8-8 dialing number."
118. **CM#14:** "I hope CRTC will establish the 9-8-8 mental health service soon. VRS needs to develop the system for 9-1-1 and 9-8-8 to recognize before turning on the screen and listen carefully whether a deaf person may make a mistaken button to request help or send a responder to meet them."

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119. "9-8-8 is critical, especially since it has happened to me as I have PTSD. I remember I was lucky to have someone in the workshop to notice my behaviour and talk seemed not right; then someone warned my hubby - took me to the hospital because I realized I had missed my medication for a few days; therefore, it is critical to have 9-8-8 VRS communication available for direct communication to figure out that it is medication and know when to refer me to the right services because I am imagining about being in that situation with me being alone and need to call 9-8-8 emergency in case the Well-Being Program office is closed and this situation happens after hours."
120. **CM#15:** "VRS can only handle 9-1-1 calls because of the system design. VRS had challenges when the Covid Pandemic health information line 8-1-1 increased in popularity. The challenge was the phone line was connected to Provincial Health Ministries. There is a technical and complex reason for this, and it should be made easier to call 8-1-1 and other services directly using VRS."
121. There should be separate and distinguishable buttons for each 9-1-1 and 9-8-8 and training for the VRS interpreters."
122. **CDBC.VRS-DWCC** recommends that the CAV figure out how to distinguish between the 9-1-1 and 9-8-8 access when available, mainly so that Deaf-Blind does not mistake one for the other.

Conclusion

123. **CDBC.VRS-DWCC** recommends that CAV technically configure the *SRV Canada* VRS platform to allow for equitable communication experiences with the 3-digit numbers, including 8-1-1, 9-1-1, and 9-8-8, to list a few.
124. **CDBC.VRS-DWCC** recommends that the CAV figure out how to distinguish between the 9-1-1 and 9-8-8 access when available, mainly so that Deaf-Blind does not mistake one for the other.
125. **CDBC.VRS-DWCC** recommends that geolocations are enabled across all devices. Add an option for activating geolocation permissions, and clearly explain these permissions in both written and signed for 9-1-1 purposes.
126. **CDBC.VRS-DWCC** recommends that CAV develop detailed educational videos, including a few scenarios to **show how to use VRS 9-1-1** :

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a. Training videos for the VI and VRS users.”

127. **CDBC.VRS-DWCC** suggests that the SRV Canada VRS platform provide another way for 9-8-8 callers to call direct face to face for ASL and LSQ support of mental health and suicide prevention. Partner up with Canadian Suicide Prevention Service (CSPS) and Well-Being Program. For further information, please see DWCC's documents submitted to the record of TNC 2021-191 here on its [webpage](#).
128. **CDBC.VRS-DWCC** observes that *SRV Canada VRS* users would love to have another enhancement with the option of having 'All View' to have a total of three screens for the VRS user, allowing the hearing caller to see the Deaf caller as well as the VI. This is one of the most recommended upgrades requested.
129. It is **CDBC.VRS-DWCC** perspective is that notifications and alerts are other primary areas that warrant immediate attention and resolutions. The system is still heavily one-sided, with Deaf callers initiating a higher percentage of calls.
130. **CDBC.VRS-DWCC** recommended possibly adding another Customer Service centre in Western Canada to address the limited hours for customer services for those who reside in the West.

***** END OF DOCUMENT*****