

**CDBC.VRS-DWCC Proposed Deaf-Blind Accessibility Costs for CAV Budget  
Supplementary Document 9**

This document is from **CDBC.VRS-DWCC**, focusing on Deaf-Blind Accessibility and CAV’s Budget.

**Table of Contents - Supplementary Document 9**

**Table of Contents - Supplementary Document 9** **1**

**Introduction** **2**

    Deaf-Blind Accessible Technical Platform 2

    Deaf-Blind National Equipment Distribution Program 2

    Communication Facilitator Service 3

**Statistics Backgrounder** **3**

    CDBC.VRS-DWCC's Statistical Determinations 3

        Mission Consulting Report 3

        The USA & Canada Statistical Extrapolations 3

**Canadian Deaf-Blind Accessibility** **4**

    Deaf-Blind Platform Information and Costs 4

    Deaf-Blind National Equipment Distribution Program 5

    Communication Facilitator (CF) Services 5

**CDBC.VRS-DWCC's Proposed Determination for CAV Budget** **6**

    Proposed Budget 6

    Separate Confidential Filing 7

**Current Canadian Deaf-Blind Supports Appendix** **8**

# CDBC.VRS-DWCC Proposed Deaf-Blind Accessibility Costs for CAV Budget Supplementary Document 9

## Deaf-Blind Accessibility

### Introduction

1. Telecommunications accessibility for the Deaf-Blind it is broken down into three components:
  - a. Deaf-Blind Accessible Technical Platform,
  - b. Deaf-Blind National Equipment Distribution Program, and
  - c. Communication Facilitator Services
2. **CDBC.VRS-DWCC** researched to gather further information to propose a cost for Deaf-Blind accessibility, especially for Video Relay Services. First, we briefly describe the three components of Deaf-Blind Telecommunications Accessibility.

### Deaf-Blind Accessible Technical Platform

3. According to **CDBC.VRS-DWCC's** research, the team found just one platform in the technology world that seems to provide the best accessibility with tools and features for Deaf-Blind VRS and telecommunications users. Deaf-Blind accessibility is provided by the application called *myMMX db* that the nWise<sup>1</sup> offers to support the users. *GlobalVRS*<sup>2</sup> has partnered to implement this platform for 12,000 registered Deaf-Blind VRS users in the United States.

### Deaf-Blind National Equipment Distribution Program

4. In the United States, there is a Deaf-Blind National Equipment Distribution Program, a federal program that enables legally blind people and Deaf and Hard of Hearing people get the necessary tools, equipment, and services at no cost for their communication needs. It is currently run through iCanConnect,<sup>3</sup> described as "Sending an email or chatting on the phone can be challenging for people with significant vision and hearing loss...[and] provides free equipment and training for people with significant hearing and vision loss..."

---

<sup>1</sup> nWise Deaf-Blind Telecommunication services - [Deaf-Blind Telecommunication Apps – nWise](#)

<sup>2</sup> GlobalVRS - [GlobalVRS. Your VRS Partner for Communication Access.](#)

<sup>3</sup> [iCanConnect](#)

## **Communication Facilitator Service**

5. A communication facilitator, or CF, is a skilled signer who copies sign language from a caller as shown on a videophone screen and provides visual information to a Deaf-Blind person through close vision or tactile sign language during VRS and face-to-face calls.<sup>4 5</sup> **CDBC.VRS-DWCC** found that the best description of such a program is currently provided by the Deaf-Blind Services Centre in Seattle, Washington State.

## **Statistics Backgrounder**

### **CDBC.VRS-DWCC's Statistical Determinations**

6. According to the Canadian National Society of the Deaf-Blind (CNSDB), there are 69,700 Deaf-Blind individuals across Canada. There are challenges in providing estimates on how many of these individuals are using or could benefit from using *SRV Canada VRS*
7. **CDBC.VRS-DWCC** has chosen two main methods to extrapolate a general estimate of possible Deaf-Blind Canadians that would benefit from enhanced Deaf-Blind friendly VRS platforms, equipment, and access to Communication Facilitators:

#### ***Mission Consulting Report***

- 1) In 2012, the Mission Consulting report projected 38,000 *SRV Canada VRS* users. According to CAV's intervention response, there are 8,271 users. This is 22% of what Mission Consulting had projected. Using this percentage on the 69,700, it would be 13,940 potential Deaf-Blind users.

#### ***The USA & Canada Statistical Extrapolations***

- 2) The population in the United States is 335,102,197<sup>6</sup> while Canada has 38,445,857<sup>7</sup> The United States has approximately ten times more people than Canada. Currently, there are 12,000 registered Deaf-Blind VRS users in the United States.<sup>8</sup> Considering the comparison of populations, we can extrapolate it to approximately 1,200 Deaf-Blind users in Canada.

---

<sup>4</sup> Seattle Deaf-Blind Service Centre - [CF Program | Deaf-Blind Service Center](#)

<sup>5</sup> Washington State - [Communication Facilitator | DSHS](#)

<sup>6</sup> [The population of the United States as of August 4, 2022](#)

<sup>7</sup> [The population of Canada as of August 4, 2022](#)

<sup>8</sup> Access 256 Productions

## **CDBC.VRS-DWCC Proposed Deaf-Blind Accessibility Costs for CAV Budget Supplementary Document 9**

8. However, if the same number of 12,000 registered Deaf-Blind for the Equipment Program, considering income requirements, many Deaf-Blind individuals were not qualified for that equipment program. Thus, likely the number would have been much higher if it was not for those criteria. In our view, this describes the practice of “eligibility criteria discrimination” to deprive those that really need the accessibility equipment.
9. **CDBC.VRS-DWCC** strongly opposes the criteria based on income requirements as needing additional equipment is an accessibility need for which the public does not expend funds. Income requirements place Deaf-Blind users at an economic disadvantage compared to sighted individuals.
10. **CDBC.VRS-DWCC** understands this may warrant a proceeding to investigate this further for more detail but fully supports that to ensure that Deaf-Blind users have communication equity in telecommunications. Without such stringent criteria.

### **Canadian Deaf-Blind Accessibility**

#### **Deaf-Blind Platform Information and Costs**

11. It is imperative for the Deaf-Blind and Low Vision Deaf people to have equal communication access that the Deaf and Hard of Hearing enjoy to ASL and LSQ Interpreting Services with a unique app called *myMMX db* that the nWise<sup>9</sup> currently offers to support the users.
12. The app offers different tools and features depending on Windows O.S. and Mac iOS, and the features and tools can see in the link above. They are significant benefits to the Deaf-Blind and Low Vision Deaf people and the CAV ASL/LSQ interpreters because the app improves their lives significantly and makes their jobs much easier to communicate with the customers more efficiently, respectively.
13. In short, the **CDBC.VRS-DWCC** support the CAV to receive a significant increase in their budget to make a considerable investment to ensure Deaf-Blind accessibility of VRS.

---

<sup>9</sup> nWise Deaf-Blind Telecommunication services - [Deaf-Blind Telecommunication Apps – nWise](#)

## **CDBC.VRS-DWCC Proposed Deaf-Blind Accessibility Costs for CAV Budget Supplementary Document 9**

14. This is possible with the purchase of a ready-made accessible platform. VRS must be accessible for all Deaf, Hard of Hearing, Deaf-Blind and Low Vision Deaf customers. Simply it is a win-win situation for all that ensures communication equity for all Deaf people regardless of their vision capabilities.
15. The nWise platform uses standard technology according to the FCC SIP VRS Profile<sup>10</sup>. It uses Real-Time Text (RTT) to communicate using text, which is the next generation text standard recognized by the FCC<sup>11</sup>, the European Standards Telecom Institute (ETSI)<sup>12</sup>, and International Telecom Union (ITU-T).<sup>13</sup> Using standard technology, it should be possible to connect calls from the nWise platform to the current platform being used by the *SRV Canada VRS*, thus providing interoperability and increase accessibility to interpreters online.

### **Deaf-Blind National Equipment Distribution Program**

16. Deaf-Blind National Equipment Distribution Program is a federal program that enables legally blind people and Deaf and Hard of Hearing people to get the necessary tools, equipment, and services at no cost for their communication needs in the United States of America.<sup>14</sup> Examples of such equipment are Accessories, Braille Devices, Computers, Mobile Devices, Phones, Signallers, and Software.<sup>15</sup>
17. Without the program, these people would face financial difficulties, which may lead them not to be able to purchase the tools and equipment they need most.
18. **CDBC.VRS-DWCC** respectfully propose that the CRTC create, develop, and establish a similar communication equipment program for the Deaf, Hard of Hearing, Deaf-Blind and Low Vision Deaf Canadians so they can have the same accessibility benefits that their American counterparts have.

### **Communication Facilitator (CF) Services**

19. A communication facilitator, or CF, is a skilled signer who copies sign language from a caller as shown on a videophone screen and provides visual information to a Deaf-Blind person through close vision or tactile sign language during VRS

---

<sup>10</sup> <https://www.fcc.gov/files/sip-forum-vrs-us-providers-profile-twg-61>

<sup>11</sup> <https://www.fcc.gov/real-time-text>

<sup>12</sup> [https://www.etsi.org/deliver/etsi\\_ts/123200\\_123299/123226/11.00.00\\_60/ts\\_123226v110000p.pdf](https://www.etsi.org/deliver/etsi_ts/123200_123299/123226/11.00.00_60/ts_123226v110000p.pdf)

<sup>13</sup> <https://www.itu.int/md/D14-SG01-C-0226>

<sup>14</sup> [iCanConnect](#)

<sup>15</sup> iCanConnect Equipment - <https://www.icanconnect.org/equipment/#mobile-devices>

## **CDBC.VRS-DWCC Proposed Deaf-Blind Accessibility Costs for CAV Budget Supplementary Document 9**

or face-to-face calls.<sup>1617</sup> **CDBC.VRS-DWCC** found that the Deaf-Blind Services Centre in Seattle currently provides the best description of such a program.

20. Communication Facilitator (CF) Services also benefit Deaf-Blind individuals by allowing them to freely express themselves in their language and communicate directly without worrying about English being their second language. It is a vital program that can and will help the Deaf-Blind and Low Vision Deaf Canadians expand their equal communication access rights through the local or provincial Deaf and Hard of Hearing services organizations as long they collaborate with the CAV to meet their customers' priority needs.
21. In Canada, approximately six provinces currently provide Deaf-Blind accessibility support services in the provinces of British Columbia, Alberta, Saskatchewan, Manitoba, Ontario, and Quebec.
22. The concept would be for the CAV to tender funding to approximately 6 (or more) service agencies across Canada to run the VRS Communication Facilitator services, for either in-home visits for communication facilitation using VRS or for walk-ins to the service agencies to meet the CF to make the VRS calls. The budget will vary according to the Deaf-Blind population in each Province (or territory if they have one). Please see the Appendix to this document to list what services and supports are currently available, to the best of our knowledge.
23. **CDBC.VRS-DWCC** believes that Deaf-led or Deaf-Blind-led services are preferable and strongly recommended as the best programs and service agencies to provide this service and not hearing-run agencies, which don't seem to have complete empathy and understanding of the Deaf-Blind experience. Additionally, they often do not have the sign language fluency nor the appropriate expertise to convey a message clearly, including using the tactile method. This must be added as the criteria in the tendering process.

## **CDBC.VRS-DWCC's Proposed Determination for CAV Budget**

### **Proposed Budget**

24. **CDBC.VRS** and **DWCC**, in their separate interventions, generally wanted the cap

---

<sup>16</sup> Seattle Deaf-Blind Service Centre - [CF Program | Deaf-Blind Service Center](#)

<sup>17</sup> Washington State - [Communication Facilitator | DSHS](#)

## **CDBC.VRS-DWCC Proposed Deaf-Blind Accessibility Costs for CAV Budget Supplementary Document 9**

to be more than the current \$30 million because they recognized that to make VRS accessible for Deaf-Blind Canadians. **CDBC.VRS-DWCC** realized that CAV would need more than this amount, but both interventions did not offer further details or a dollar amount suggestion at the time. The rationale is that **CDBC.VRS-DWCC** required gathering more information before providing a suggested annual budget number.

25. **CAV** proposes \$41 million based on current user number increases annually for the next five years to 2027. Submitting a \$41 million budget did not entail specifics in this projected number of million dollars increased cap.
26. **CDBC.VRS-DWCC** supports the **CAV** suggests, however, because it is unsure whether this \$41 million includes any of the Deaf-Blind Accessibility *components*, which involve three parts:
  - a. Deaf-Blind Accessible VRS technical platform
  - b. Canadian Deaf-Blind Equipment Assistance Program
  - c. VRS Communication Facilitator Services
27. **CDBC.VRS-DWCC** has done intensive research to develop numbers for at least two components of the Deaf-Blind Accessibility Proposal: Platform and the national Deaf-Blind accessible equipment program.
28. The third component, Communication Facilitator services, **warrants more time to investigate to calculate costs for this proceeding.**
29. The Canadian Deaf-Blind Accessible VRS technical platform start-up costs would be \$600,000 USD for Year One and then \$500,000.00 annually after that. Note that \$600,000 USD equivalent in Canadian dollars (CAD) is, using today's rate of exchange, **\$772,292.00**, and \$500,000.00 USD equivalent in CAD is **\$643,606.00**.
30. The Canadian Deaf-Blind Equipment Program cost proposal is **\$6 million** to start as a trial.
31. To start, the total, including the technical platform and the telecommunications equipment accessibility costs, would be \$6,772,292.00 CAD, and then annually after, it would be \$6,643,606.00 CAD.
32. With CAV's proposed \$41 million, adding the **\$6.8 million** equals a \$47.8 million projected annual budget from 2023 to 2027.

## **CDBC.VRS-DWCC Proposed Deaf-Blind Accessibility Costs for CAV Budget Supplementary Document 9**

33. **Therefore, CDBC.VRS- DWCC** proposes that the CAV's budget be increased to **\$50 million** starting in 2023, and this 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
34. As a reminder, the Accessible Canada Act was passed in 2019, recognizing ASL, LSQ, and ISLs as the primary language of Deaf people in Canada. This Act means ensuring ALL Deaf, Deaf-Blind, and hard of hearing that use these Sign Languages in Canada have access to *SRV Canada VRS* to ensure communication equity in telecommunications.
35. Again, the information provided is based on what details **CDBC.VRS-DWCC** team members could gather up to this point. It does NOT include the third component with the VRS Communication Facilitator Services calculations, as more time is required for further research to draft a budget proposal for the additional VRS Communication Facilitator Services.

### **Separate Confidential Filing**

36. Separately, according to subsections 39. (1)(c)(ii) and 39. (1)(c)(ii) of the *Telecommunications Act*, the **CDBC.VRS-DWCC** will file a one-page document with a breakdown of the cost for the technical platform that provides accessibility for Deaf-Blind. We ask that this document be granted confidentiality as disclosure of its details may prejudice future commercial negotiations in this matter. We have provided a separate, redacted version of the document to be placed on the public record.
37. In making its request for confidentiality under the *Telecommunications Act*, the **CDBC.VRS-DWCC** acknowledges that the Commission may decide not to grant our request under that statute. Should that be the CRTC's determination, we respectfully ask that the CRTC grant our request by exercising its powers under sections 5 and 7 of its rules of practice and procedure to modify its procedure in this proceeding.



## **CDBC.VRS-DWCC Proposed Deaf-Blind Accessibility Costs for CAV Budget Supplementary Document 9**

### **Appendix A**

#### **Current Canadian Deaf-Blind Supports**

Partial List of Deaf-Blind Organizations, Agencies & Services

Consumer or community groups = # Others may be agencies/service organizations.

#### **NATIONAL**

Canadian Deaf-Blind Association – CDBA– National Office

Canadian Foundation for Physically Disabled Persons

Canadian Hard of Hearing Association ?

Canadian Helen Keller Centre, Inc.

Canadian National Society of the Deaf-Blind #

#### **ALBERTA**

Alberta Society of the Deaf-Blind #

Canadian Deaf-Blind Association – CDBA - Alberta Chapter

Edmonton Fellowship for the Deaf-Blind # ?

#### **ATLANTIC PROVINCES**

Atlantic Provinces Special Education Authority (APSEA)

Canadian Deaf-Blind Association – CDBA- New Brunswick and  
Prince Edward Island Chapter

#### **BRITISH COLUMBIA**

BC Provincial Outreach Program for Students with Deaf-Blindness

Canadian Deaf-Blind Association –CDBA- British Columbia Chapter

Deaf-Blind Planning Committee – Consumer Group #

TAPS Program – Wavefront Centre for Communication Accessibility

#### **MANITOBA**

E-Quality Communication Centre of Excellence (ECCOE)

Manitoba Deaf-Blind Association, Inc. ?

S.P.I.K.E. Inc.

The Resource Centre for Manitobans who are Deaf-Blind (RCMDB)

## **CDBC.VRS-DWCC Proposed Deaf-Blind Accessibility Costs for CAV Budget Supplementary Document 9**

### **ONTARIO**

The Bob Rumball Associations for the Deaf  
Canadian Deaf-Blind Association – CDBA- Ontario Chapter  
The Canadian Hearing Society - Deaf-Blind Services  
Canadian National Institute for the Blind – C.N.I.B. - Ontario Division  
Consortium Centre Jules-Léger  
Deaf-Blind Association of Toronto #  
Deaf-Blind Coalition of Ontario  
Deaf-Blind Ontario Services  
Ontario Usher Syndrome Association - ?  
Rotary (Don-Valley) Cheshire Homes Inc.  
W. Ross MacDonald School – Deaf-Blind Resource Program  
Intervenor Organization of Ontario

### **QUEBEC**

l'Institut Nazareth et Louis-Braille (INLB)  
l'Institut Raymond Dewar  
l'Association du Syndrome de Usher du Québec (ASUQ) #

### **SASKATCHEWAN**

Canadian Deaf-Blind Association – CDBA- Saskatchewan Chapter  
Deaf-Blind Community Services (C.N.I.B.)  
Saskatchewan Deaf and Hard of Hearing Services

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