



**Canadian Deaf-Blind Collective
(CDBC.VRS)**

Intervention

for

CRTC TNC 2021-102

May 16, 2022

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Land Acknowledgement:

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

Remembering...

“*Based* on history, there has been no direct Deaf-Blind representation in past VRS-related CRTC proceedings. At a minimum, in 2014, some VRS committees and participating groups mentioned Deaf-Blind and accessibility.

It was not enough. No word of Deaf-Blind was on the resulting Telecommunications Regulatory Policy 2014-187.

A determined and mighty group of Deaf-Blind came together as a Collective to put forward their common message that they wish to be included in the next policy with accessibility to VRS with their visual needs. Deaf-Blind Canadians deserve equity with sighted Deaf and hard of hearing Canadians for accessibility to Canada’s VRS service.

The Accessible Canada Act has been in effect since 2019. Therefore, the Ministry of Innovation, Science, and Economic Development (ISED), CRTC and the CAV cannot ignore the Deaf-Blind any longer.

We are here, do not ignore or forget us again. ”

**~ Canadian Deaf-Blind Collective-VRS
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Executive Summary

In this *Review of Video Relay Services, Telecom Notice of Consultation CRTC 2021-102* proceeding, the collaborative team of Deaf and Deaf-Blind members have faced many challenges since their initial efforts doing research and writing. Including the issues of distance, time zones, work schedules and communication technology access, the members had to deal with personal and social difficulties made harsher by the pandemic. Yet, they persevered to produce not one but several relevant documents.

You have read brief descriptions of the two organizations, their aims and purpose to provide the missing link to a population that was ignored in establishing the Canada Video Relay Service from the first CRTC proceedings and their determination not to be ignored again.

In this Intervention are their answers to the fourteen questions posed by the Commission, which are presented in a combination of responses by individuals quoted from the Deaf-Blind Survey and team members who did analyses, with additional input from the Deaf family, friends, and allies where appropriate.

The answers to the questions include references and suggestions for solutions to issues identified by the CDBC.VRS team members and their community peers. After the Question-and-Answer section will be a brief Conclusion and a referral to Recommendations in the Survey report. The Intervention will be followed by the Canada Deaf-Blind VRS Survey Report, to be filed on May 16, 2022.

These documents are not the final research documents, comments, and recommendations but rather stepping stones to full, equitable, and continuing consultations on telecommunication that the Deaf-Blind Canadian community demands as their place in a fully Accessible Canada.



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May 16, 2022

Mr. Claude Doucet
Secretary-General
Canadian Radio-telecommunications and
Telecommunications Commission (CRTC)
sec-gen@crtc.gc.ca

Dear Secretary-General,

Call for comments – Review of Video Relay Services, Telecom Notice of Consultation CRTC 2021-102 (Ottawa, March 11, 2021) – Intervention.

Intervention

Intent

- 1. The Canadian National Society of the Deaf-Blind (CNSDB)** participates in this proceeding with the **Deaf-Blind Planning Committee (DBPC)**, as the “**Canadian Deaf-Blind Collective,**” or “**CDBC.VRS**” The **CDBC.VRS** hereby submits this Intervention and asserts its wish and intent to participate in the virtual discussions mentioned on [TNC 2021-102-3](#) to ensure the Deaf-Blind perspective is included in the process.

Group Name

2. For the purpose of this collaborative effort, the CNSDB & DBPC will participate as the “**Canadian Deaf-Blind Collective**” or “**CDBC.VRS.**” As we conducted our research and writing, other Deaf and Deaf-Blind individuals and groups were included to add their comments and observations as part of the Collective.
3. The **Canadian National Society of the Deaf-Blind, Inc.** (CNSDB) was registered in 1985 as a national consumer-run advocacy association dedicated to helping Canadians who are Deaf-Blind achieve a higher quality of life. We advocate for new and improved services for Deaf-Blind, promote public awareness of Deaf-Blind issues and gather and distribute information that will help people who are Deaf-Blind to become full members of society.
4. **The Deaf-Blind Planning Committee** (DBPC) was created in 2012 to develop activities and programs for the community of Deaf-Blind adults and youth whose social, communication and support service needs were not being met by other agencies or programs in the Greater Vancouver area of British Columbia. The DBPC members are Deaf-Blind, Deaf, and hearing persons who have connections to the Deaf-Blind community as allies, consumers, family, or interpreters /intervenors.

History

5. Based on history, there has been no **direct** Deaf-Blind representation in past VRS-related CRTC proceedings: TNC 2013-155 or TNC 2014-188. The CDBC acknowledges that other groups, such as the BCVRS Committee (in its documents dated 17 May 2013 and 14 November 2013 submitted to TNC 2013-155), have mentioned Deaf-Blind, but it is our view that the Deaf-Blind experience and perspectives were not distinct enough to make a difference in the resulting policy of CRTC TRP 2014-187. The Deaf-Blind were left out of the first version of Canada’s VRS Policy. The CDBC intends to make sure this does not happen again.

6. A Deaf-Blind person is a member of a unique population. The way of being for Deaf-Blind people is absolutely unlike the experience of Deaf persons who have vision, absolutely unlike the experience of blind persons who have hearing. Even though there seem to be some similarities shared by persons who are Deaf or blind with those who are Deaf-Blind, trying to provide services that are established for those who are only Deaf or only blind does not address the distinct differences within the unique identity of Deaf-Blind persons.

Survey Analysis Report

7. The CDBC.VRS intends to submit a survey analysis report to the record. This report will include background information with references to a comprehensive review of terminology and descriptive facts related to deafblindness as a medical definition, Deaf-Blind as an identity, and services beneficial and necessary to their lived experiences. The focus of the Deaf-Blind Survey on VRS was to gain demographic data on the respondents, their experiences and perspectives on the Canada Video Relay program - SRV Canada VRS. The information from the survey has assisted the CDBC.VRS team to respond appropriately to the questions for participation in this proceeding.
 8. In this document, the CDBC.VRS sets out to answer 14 proceeding questions in the published **TNC 2021-102** to affirm its intent to participate in this proceeding.
 9. Questions and Responses begin in the next section.
-

Questions and Responses

VRS user experience

QUESTION 1

Q1. Describe the impact that the introduction of VRS has had on people who communicate using sign language.

Has the service improved access to telecommunications services since it was launched?

Q1. ANSWER:

10. In CDBC.VRS' Survey analysis, the majority of Deaf-Blind respondents said that "Yes, VRS has improved their lives since using the service." Some examples are that they felt more connected with their hearing family and friends with smoother conversations without barriers. They finally could call and feel more connected with their medical professionals using their first language to communicate and, for example, order their prescriptions. They felt they could finally call independently without setting a schedule to call with an untrained hearing person.
11. Yes, telecommunications accessibility has improved as an additional option for phone communications. Yet there are challenges for those with varying degrees of vision who identify as Deaf-Blind sign language users. These Deaf-Blind persons can use sign language to communicate with the interpreter, but they need a tactile means to receive messages from the interpreter on a screen that they cannot see.
12. A solution to this challenge does exist, and it is to use trained personnel to provide the needed connection. These individuals are called Communication Facilitators (CF), and in fact, there is an example described on a website by the Deaf-Blind Service Centre (DBSC)¹, available in Washington State.

¹ Deaf-Blind Service Centre (DBSC) - [Deaf-Blind Service Centre](#)

13. The concept of Communication Facilitators (CF)² is where they would “watch the VRS on the screen and transfer the information from the screen through tactile sign language to the Deaf-Blind consumers.
14. To paraphrase the DBSC’s description, "a CF is a sighted person, whether they are hearing or Deaf, who use tactile signing with the DeafBlind person to access a screen device, like a Video Phone (VP) to make phone calls. It could be through any webcam device: a computer, iPad, or iPhone.
15. DeafBlind people can use technology to make phone calls to arrange appointments with their doctor, dentist, or hairdresser. Calls may go through VRS (Video Relay Service), and the CF would relay information to the DB individual while making those contacts."³
16. It is strongly recommended that federal or government funding be directed to service provider agencies for such support services in Canada.

QUESTION 2

Q2. Are there concerns or issues related to the VRS user experience, including ease of use, quality of service (technical and interpreter-related), outages, the user complaint and feedback mechanism, account suspensions, or others?

Q2. ANSWER:

Ease of use and Technical Quality of Service

17. Currently, the platform application is challenging for many CDBC.VRS members because of currently limited accessibility features. Thus, CRTC must ensure the technical platform and application is fully accessible for the Deaf-Blind.
18. With the SRV Canada VRS app, many modifications are required to make it fully accessible to those who are Deaf-Blind or low vision

² DBSC - Communication Facilitator Program [CF Program | Deaf-Blind Service Centre](#)

³ DBSC - Communication Facilitator Program [CF Program | Deaf-Blind Service Centre](#)

users. There will need to be modifications for colours and more adaptability options in the chat text box.

19. For the chat text box, Text settings, with the current colour scheme options, more choices need to be available for the colour options for their accessibility. To give a specific example, the current "*Colour Scheme 4*," which is a yellow background with black text, should be the opposite - black background with yellow text.
 - The options that should be offered are:
 - a. Black background, yellow text.
 - b. Black background, bright green text.
 - c. Black font on a green background.
20. To provide better visibility, options for text should include choosing bold or thicker font of the text. However, one wonders whether the section in the Text settings is accessible.
21. Additionally, there should be an assurance that braille device connections are compatible while using the SRV Canada VRS app.
22. The smartphone app is currently not accessible for Deaf-Blind.
23. There is no option to enlarge the App whole text interface, only from within the text chat box.
24. A survey and a hands-on focus group or group established for beta testing of Deaf-Blind should be formed to test all the current features and offer recommendations for full accessibility to a wide range of Deaf-Blind VRS users.
25. The button on the computer platform to click to access 9-1-1 services is red, which is difficult for the Deaf-Blind to see and locate. The button needs to be in a different colour scheme, black with contrasting colours such as yellow, orange, or bright green.

QUESTION 3

Q3. Based on users' experiences and the information filed on the record of this proceeding, is it necessary for the Commission to impose specific quality of service standards on the CAV?

If so, what should those standards include and why?

Q.3 ANSWER:

- 26.** CDBC.VRS has reviewed the TNC 2014-187 policy and checked the items regarding the quality of services, and made the following comments.
- 27.** For Deaf-Blind VRS users, it is essential to have high-quality and clear video as a critical component of video relay services for their full accessibility. Standards to meet this minimum requirement are needed. For Deaf-Blind VRS users, it means the ability to have a 16:9 perspective on the screens and the ability to project the interpreter on the smart television series, perhaps with the app available on streaming devices or mirroring ability of the phone to the big screen, and the provision of web cameras with appropriate 1080p resolution compatibility.
- 28.** Deaf-Blind needs to be able to receive the incoming notifications for calls, which might mean more accessible options are made possible, such as vibrating means of notifications compatible with the apps and platforms.
- 29.** The complaint system needs to be re-designed because CDBC.VRS members do not feel comfortable telling Customer service about interpreter issues. Deaf-Blind, in general, have a close relationship with interpreters as they rely on the preferred interpreters for communication with their dual disability. Therefore, CDBC.VRS wishes to see a separate complaint mechanism for interpreters than the current 9050 line out of respect to the interpreters' professional boundaries.
- 30.** The elevation mechanism for complaints to the CRTC is currently not working, with a few Deaf-Blind having had their issues referred back

to the CAV when it is the CAV they are having issues with. So the current system for this is ineffective. It needs to be redesigned and perhaps with a neutral external ombudsman type of service with mediation as part of its issues resolution, similar to the current CCTS architecture but accessible in ASL or LSQ.

31. CDBC.VRS agrees that CAV needs to report annually and as required to the CRTC. CDBC.VRS would appreciate a record and maintenance of VRS usage data about Deaf-Blind callers with a trend analysis made possible and available to the public to identify possible Deaf-Blind accessibility challenges.

QUESTION 4

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

Q.4 ANSWER:

32. From the responses gathered through the CDBC.VRS Deaf-Blind VRS Survey, the majority of the respondents had not used the VRS 911 calling feature. Just 13 of the 48 respondents said they had used the VRS to call the emergency 911 number. Of these 13, only one caller was dissatisfied with their experience, 11 others said the service was “fine” or “good,” and one rated it as excellent.
33. The one respondent who rated the 911 call feature did so because they had used the app on their PC and was connected rapidly to the VRS interpreter, who was not in the province of the caller - but was able to have the 911 call routed to the correct provincial dispatch office. The VRS interpreter remained online past their shift end, staying with the customer who called on behalf of a family member, not in extreme urgency but needing an ambulance to transport the patient to the ER. When the ambulance dispatcher was able to text the Deaf, visually impaired senior on their mobile phone, the VRS interpreter was released from their duty, signing off with wishes for a

good outcome for the patient. This experience should be standard - staying online until the caller has reached a comfortable connection and resolution of their issue(s).

34. Statistics aside, the main issue of using the 911 feature on the VRS app for the “red button” to be the faster way to connect in an emergency but which appears only on the Apple or PC app, not on the iPhone, iPad, or Android phone or tablet. In an emergency, when people often are not thinking clearly, they must have a quick and fast way to connect to the 911 line. **The app must be redesigned** to have this 911 call “button” easily visible for a Deaf or Deaf-Blind person to find in any emergency wherever they can use a phone or tablet with wi-fi or wireless.

VRS regulatory policy and the CAV

QUESTION 5

Q5. VRS is currently delivered by the CAV, a centralized and independent administrator. Is there any evidence that the market context, including the availability of sign language interpreters, has changed since the VRS Policy in 2014 to such an extent that the Commission should consider introducing a competitive model for delivering VRS?

Q.5 ANSWER:

35. CDBC.VRS presents the perspective of Deaf-Blind people that a competitive model already exists with the number of interpreter agencies available in the community. However, the inadequate number of interpreters is a concern. There need to be more interpreters available for a fully operational SRV Canada VRS with fewer caller line-ups.

- 36.** Deaf-Blind Canadians would like to see enough interpreters for the community, so there are adequate numbers of interpreters available for medical, legal, and education settings and their specialized Deaf-Blind clientele service needs.
- 37.** As a group, CDBC.VRS wonders if the federal government can help create a 5-year or 10-year limited-time funding boost to increase the number of instructors trained to teach sign language interpreter students in the interpreter education programs, resulting in more students graduating. Additional interpreter training programs or centres could be established with the increased demand for more interpreting student spaces.
- 38.** As individuals and as a distinctive cultural group, Deaf-Blind people value their independence and do not want to rely solely on their family or friends to make the VRS calls for them. The concept of having trained Communication Facilitators for when they make VRS calls, as is provided in some USA states, would provide a viable option if funded appropriately.
- 39.** The Canada Deaf-Blind Collective-VRS supports the Deaf Wireless Canada Consultative Committee (DWCC) recommendations that the federal and provincial governments create a funding model to develop CF programs and specialized training for interpreters and agencies to deliver accessible communication to Deaf-Blind consumers.
- 40.** Funding needs to be created for this at the federal level and allocated to provincial service agencies located in the main metropolitan areas where Deaf-Blind usually reside.
- 41.** Such funding for training could create employment opportunities for Deaf, Deaf-Blind, and Hard of Hearing persons to contract with agencies and the government to provide sign language instruction and training on Deaf and Deaf-Blind issues.

QUESTION 6

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

Q6. ANSWER:

42. CDBC.VRS recommends two changes to the Board of Directors structure directly resulting from the Accessible Canada Act.
43. First, the policy change must include Deaf-Blind participation and consultation. A Deaf-Blind person must be on the Board of Directors to represent the views and needs of the Deaf-Blind VRS users.
44. Secondly, CDBC.VRS supports the idea that the ASL/LSQ director position be converted to a representative from the Indigenous Deaf community. This member would represent the Indigenous Sign Language (ISL) which the Accessible Canada Act recognizes.
45. This expansion should not be a challenge because of CDBC.VRS observes that the Broadcasting Accessibility Fund (BAF)⁴ currently has **four** Accessibility Directors. Therefore, it is possible to revise that to the third director and add a fourth (Deaf-Blind) director in a proposed restructure of the Board.

QUESTION 7

Q7. Registered users who are Deaf or hard of hearing currently elect three members of the CAV's Board of Directors: one ASL Director, one LSQ Director, and one joint ASL-LSQ Director.

Telecommunications service provider (TSP) stakeholders elect two TSP Directors. Does this method for selecting Directors require improvement? If so, provide a rationale for this position and suggestions for improving the process.

⁴ Broadcasting Accessibility Fund (BAF) - Board Director list: <https://www.baf-far.ca/en/board-directors-and-staff>

Q7. ANSWER:

- 46.** The current way it is set up for elections seems acceptable for our community. However, the documents sent to stakeholder groups for election processes need to be made 100% accessible for any Deaf-Blind stakeholder groups to participate. Distribute all materials in WORD document format, which will enable screen readers to convert text to refreshable braille displays, and for those Deaf-Blind persons who may rely on text to speech computer programs.
- 47.** Also, CAV may need to go an extra step to assist the Deaf-Blind stakeholder groups in creating a standard and fully accessible internal elections system to collect the votes from its members to assist the Deaf-Blind stakeholder organization in submitting its election choice to the CAV administration.

QUESTION 8

Q8. Is there a rationale for expanding the CAV's mandate to give it the flexibility to administer developing and future message relaying technologies?

Q8. ANSWER:

- 48.** CDBC.VRS members view text message relay and IP relay services in their current system structure as such that VRS should not absorb their functions. There are too many different "working parts" in the VRS structure compared to the message relay. The CRTC needs to keep the two systems separate.
- 49.** The Deaf-Blind consumer groups view that the Commission should consider an administrative body for the text message relay system, but that might be for a future proceeding. To avoid going out of scope, we will save the rest of the response to this question for another proceeding.

50. Regardless, Deaf-Blind Canadians will need to be critical stakeholders of both relay administrative bodies to ensure both are accessible to their needs.
51. However, one thing that must be re-emphasized is that Deaf-Blind with various sight levels must be included in beta testing and advisory roles when adjusting the current VRS platform to be accessible for the Deaf-Blind VRS users.

Funding

QUESTION 9

Q9. Funding for VRS comes from the National Contribution Fund (NCF). Are the current funding model and the \$30 million annual funding cap still appropriate?

Q9. ANSWER

52. CDBC.VRS only sees that it has spent a total of \$30 million only in this last year out of the six years it has been operating the SRV Canada VRS service.
53. If this is the case, there must be more funds and an increased cap that ensures the accessibility of the Deaf-Blind Canadians wishing to use VRS in Canada. This increased cap should include mandated funds for the following accessibility of Deaf-Blind VRS users:
- a. One-to-one in-person customer product tech support assistance for the Deaf-Blind. Other groups would also benefit from this service:
 - a. Indigenous in remote regions,
 - b. DDBHH seniors,
 - c. Deaf with disabilities, and
 - d. those who are not literate with technology would also benefit from a group of staff available to meet these customers with increased technical needs.

b. Communication Facilitator training and services funded by the CAV budget to be paid to local service provider agencies to provide the service of tactile or close up interpreting of Deaf-Blind wishing to use VRS, coordinated for either on-site CF services or having the CF coming to their home at appointed times to make the calls.

- Deaf-Blind sensitivity training provided by a Deaf-Blind trainer and facilitator.
 - National Accessibility Deaf-Blind Equipment Program (NADBEP) provides equipment for Deaf-Blind to access information and communication to meet the Accessible Canada Act requirements.
- Deaf-Blind Director on the Board of Directors

54. Funding must be created, and the programs and services are made available to the Deaf-Blind to achieve equity with sighted Deaf and Hard of Hearing Canadians. CDBC.VRS emphasizes that Deaf-Blind Canadians need access to information and communication, as stated in the Accessible Canada Act.

55. While it is unknown how much more funding is required or needed to be accountable for providing full Deaf-Blind accessibility, CDBC.VRS is aware that an initial \$10 million annually was provided to support programs that distribute communications equipment to low-income individuals who are Deaf-Blind. According to this link, this was operated from 2012 and expired in 2016, and then extended to 2017 before it became a certified program (2021).⁵

56. CDBC.VRS suggests that CRTC contact Global VRS⁶, noise⁷, and the FCC has two reference links; the first is Relay Services for Deaf-Blind⁸ National Deaf-Blind Equipment Program⁹ administrators to collect the financial projections for such accessibility.

⁵ "FCC announces 2020-2021 Allocations for the NDBEDP (DA 20-527) - Public Notice [Word II PDF](#) (5-18-20)

⁶ GlobalVRS <https://globalvrs.com>

⁷ nWise - [MMX enables phone calls for deafblind BSL users in Scotland – nWise](#)

⁸ FCC - <https://www.fcc.gov/document/relay-services-deaf-blind>

⁹ FCC - [National Deaf-Blind Equipment Distribution Program | Federal Communications Commission](#)

57. CDBC.VRS is aware that the telecoms may balk at this. Therefore, it is our view that there might need to be a different payment regime that minimizes the protests of the telecommunication service providers. Accessibility needs to be out of the telecommunication service providers' hands; it is not something to waffle on; the federal government is now responsible for adhering to the Accessible Canada Act and ensuring the full accessibility of Deaf, Deaf-Blind and Hard of hearing Canadians.
58. Please reference the Deaf Wireless Canada Consultative Committee addendum document for further ideas of an alternative to the National Contribution Fund (NCF), where the telecommunication service providers have a lesser role.

QUESTION 10

Q10. Retail Internet service revenues are not currently considered contribution-eligible revenues for funding VRS. Should those revenues be included? Provide a detailed rationale.

Q10. ANSWER:

59. If there is a need to increase the funds since the *SRV Canada VRS* is heavily dependent on the use of the internet, it would be a good idea to include retail internet service revenues to add to the pot of funds, to create more funding for full accessibility that include Deaf-Blind requirements.
60. CDBC.VRS wonders if there could be telecommunications customer contributions to increase the funds for accessibility. In the States, they consider it taxpayer-contributed universal funds, from everyone's phone bills, wireless, and internet bill, including their cable bill, that will create a huge pot of funds to support a broad range of accessibility needs. This way, the telecommunication service providers are removed from the equation.

61. A warning here related to placement and use of advertising on internet sites, if this option is chosen, any advertisement must not interfere with the accessible view or function of the app and service.

QUESTION 11

Q11. The CAV must meet minimum requirements, including submitting an annual application to the Commission, for the NCF to release funds. Are these minimum requirements still appropriate? If not, what changes or additions are required and why?

Q11. ANSWER:

62. According to the VRS Policy (TNC 2014-187), the minimum requirements in Appendix B are several areas we have issues with.

Multiple Platforms for Accessibility

63. About the minimum requirements set out in TNC 2014-187, paragraphs 16 - 18, CDBC.VRS makes the following comments:
64. A CDBC.VRS supports a monitored and administered platform, a single (shared) VRS technology platform with tethered interoperability for choice and accessibility; however, it must be possible to have a few different VRS companies tethered to the main platform, with a few different designed video communication platforms so that the customer has a choice of which app fits their needs. Such an example would be a separate tether interoperable service.
65. For example, for the Deaf-Blind VRS users, we would suggest nWise developing the MMX platform accessible to these users, including braille, to be interoperable with the main administered platform. nWise has the ability to interface with others, such as it does for [GlobalVRS](#).¹⁰

¹⁰ GlobalVRS - <https://globalvrs.com/db/#yellow>

66. To further explain the technical specifications for the Deaf-Blind accessibility, allow CDBC.VRS to present an excerpt from its website with wording as follows: “GlobalVRS has dedicated time and resources to analyse and document the specific needs of a wide variety of DeafBlind and Deaf-Low Vision individuals.
67. To provide a service that will meet our high standards, we have joined forces with nWise, a leading enterprise in technologies adaptable to DeafBlind and Deaf-Low Vision needs. nWise provides the software needed to make a VRS call possible for a DeafBlind or Deaf-Low Vision person. With nWise’s technology and GlobalVRS’ quality of service, the outcome is a complete and satisfactory experience for the user. “

International Calling

68. Deaf-Blind Canadians would like to be able to call their Deaf-Blind friends in the States, and therefore CAV needs to work toward having its platform become fully interoperable with FCC’s SIP video interoperability standards for point-to-point calls for video calling.

69.

9-1-1 Accessibility

70. On the desktop applications, there is a red button and that colour is not accessible for the Deaf-Blind, and on the mobile devices, there is no 9-1-1 button. The 9-1-1 button must be on the mobile devices, period in an accessible colour for the Deaf-Blind, black button with bright yellow or orange 9-1-1 text.
71. It should not be the onus on the VRS user to keep their addresses updated, because what if an emergency happens on the first day of the person moving to a new location, they should not have to spend 3 minutes explaining their address to the operator/dispatcher, as every minute counts.

72. Currently “wireless 9-1-1 calls [are] routed based on the location of cell towers, which can cover up to a 10-mile radius. This can cause delays in emergency response, especially when a call is made within PSAP border areas where state, county or city boundaries overlap.”¹¹
73. As noted across the border, AT & T says it is possible to save the hassle with the emergency calls by initiating location-based routing 9-1-1 calls. This allows the wireless carrier to transit wireless emergency calls to the correct call center based on a device’s GPS location. A quote from its press release¹² is as follows:
- a. “AT&T* is the first carrier to launch location-based routing to automatically transmit wireless 9-1-1 calls to the appropriate 9-1-1 call centers on a nationwide basis. Through this new “Locate Before Route” feature from Intrado, AT&T can quickly and more accurately identify where a wireless 9-1-1 call is coming from using device GPS and hybrid information to route the call to the correct 9-1-1 call center, also known as public safety answering point or PSAP. With location-based routing, a device can be located and routed within 50 meters of the device location.”
74. Canada needs to follow suit with this kind of set up, and not only rely on the old system with Global Positioning Systems (GPS).

Equipment

75. In reference to the TNC 2014-187 in Appendix B, item number 28 whereas it says the VRS “should be provided at no additional cost to the customer,” however the CAV failed on this point by telling the customers to BUY the embrava Blynlight to work with their system for flash notifications. CAV should support all the customers by distributing one free Blynlight to each customer.

¹¹ AT & T Press Release - [AT&T Launches First-Ever Nationwide Location-Based Routing](#)

¹² The Verge - [AT&T will now use a device's GPS location to route 911 calls - The Verge](#)

76. The majority of Deaf-Blind are on low income and cannot afford equipment, and yes, that includes the Blynclight when they are on fixed incomes.

Providing the Materials for Technical Configuration

77. In reference to item number 27 in the same policy, this is not currently accessible to the Deaf-Blind. The website is currently particularly challenging for the Deaf-Blind to navigate and find the resources it needs and everything is provided in PDF format, which is not fully accessible for the Deaf-Blind VRS users.

Billing Customers

78. In reference to item number 29 in the VRS policy, the wireless accessibility proceeding, video mail and automated forwards from phone/text numbers to video mail should not be surcharged as that is considered an accessibility feature.

Awareness and promotion of VRS

QUESTION 12

Q12. Is there sufficient awareness of VRS among sign language users, as well as among the businesses, institutions, and individuals that may receive VRS calls? If not, what additional measures are appropriate?

Q12. ANSWER:

79. Despite the number of Deaf-Blind respondents in the survey who indicated they knew about the Canada VRS, there are still individuals in the Deaf and Deaf-Blind communities who are unaware of this service, and in fact, there are some Deaf adults who have not used sign language interpreters or text-based message relay services. For various reasons, some individuals have had little interaction with peers in their communities.

80. One anecdote from a CDBC.VRS team member described how they had met up with an old school friend who is deaf. This person had never used sign language interpreters or experienced using relay services in their adult life, depending on family members to do the communication for them. As a result of the reunion, the former classmate is now asking how they can use interpreters for family events and perhaps the next step would be to learn to use text-based and video relay services to enhance their self-confidence and have greater independence.
81. It would therefore make sense to develop multimedia and a multi-layered approach for public education about communication services for Deaf, Deaf-Blind, and Hard of Hearing people. Create and place Public Service Announcements on television, social media and in newspapers, magazines, and the internet. Have DDBHH individuals go to different community events and talk about how the VRS has made an impact on their lives and how to share that with their family and friends.

QUESTION 13

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

Q13. ANSWER:

82. Stakeholders such as DDBHH organizations can invite VRS Community Outreach workers to attend their meetings, fundraising events, and information fairs. CAV should research communities and find which organizations, agencies and schools would benefit from information sharing so that news and vlogs can be distributed to their members and clients.
83. For the general public, text, television, and video PSAs, posters in transit shelters, and on their platform screens would spread awareness to the wider community.

Timing of the next review

QUESTION 14

Q14. When should the Commission next review VRS?

Q14. ANSWER:

- 84.** CDBC.VRS' view is that CRTC waited too long for the first review for VRS in Canada. We understand COVID-19 is one of the impacts, but it is our perspective that CRTC must review it three years after the new and updated policy due to this first review delay.
- 85.** As a result of this delayed first review, CDBC.VRS suggests that there should be a review every three years for the next two reviews, and only when it stabilizes and becomes complacent, following all policies and regulations that the majority of stakeholders would like to see, then at that point, it can it shift and the review can be every five years.

Conclusion

- 86.** In conclusion, the CDBC.VRS team has worked to collect as much information to present to the Commission and all participants in this TNC 2021-102 proceeding the perspectives of Deaf-Blind consumers who have experienced barriers and isolation not just during the past two years of the pandemic, but throughout their lives. Their ability to participate in their communities and in the greater Canadian and international societies could be more inclusive and equitable with access to telecommunication technology and services as we have presented.
- 87.** The CDBC.VRS thanks all who partnered with the team and for the opportunity to share their experiences and wishes everyone the best going forward.

Recommendations

88. CDBC.VRS would like to direct the CRTC and participating parties to reference the CDBC.VRS Survey Report for the list of recommendations it makes for Deaf-Blind accessibility to Canada's VRS system.
89. And this concludes our intervention for the proceeding, please see our survey analysis report for further details of the Deaf-Blind Canadians' experience and perspectives on VRS in Canada.
90. If you have any concerns or questions, please contact **Megan McHugh** or **Terri Nolt** at the respective emails in our signatures below **and** at the shared email address CDBC.VRS@gmail.com.

Thank you,

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*****END DOCUMENT*****