



Mr. Claude Doucet  
Secretary General  
Canadian Radio-television and Telecommunications Commission (CRTC)  
Ottawa, ON KIA ON2

March 29, 2021

**Call for comments – Review of video relay services CRTC Telecom Notice of Consultation CRTC 2021-102 (Ottawa, March 11, 2021) - Reply to Procedural Requests**

Dear Secretary General,

1. Canadian Association of the Deaf-Association des Sourds du Canada (**CAD-ASC**), Deaf Wireless Canada Consultative Committee-Comité pour les Services Sans fil des Sourds du Canada (**DWCC-CSSSC**), and Canadian National Society of the Deaf-Blind (**CNSDB**) [collectively, **CAD-ASC et al.**] hereby participate in the aforementioned proceeding by first submitting this reply to a procedural request submitted by the CAV on March 22, 2021.
2. CAD-ASC et al. advocates for the full inclusion of diverse members within the Canadian Deaf, DeafBlind and Hard of Hearing (**DDBHH**) community in Canadian society. The spectrum of DDBHH life experiences range from those with cognitive delay, immigrants learning English or French as a second language, those with various degrees of hearing loss, those with the unique “double” disability of DeafBlindness, and finally native ASL/LSQ users.
3. Members of CAD-ASC et al. introduce themselves as follows:

**CAD-ASC** is a national information, research and community action organization of Deaf people in Canada. Founded in 1940, CAD-ASC’s mandate is to protect and promote the needs, rights, and concerns of Deaf people who use American Sign Language (ASL) and langue des signes québécoise (LSQ) in Canada. We are the national information, research, and community action organization of people who are culturally and linguistically Deaf. We partner with national organizations of persons with other communication disabilities including Deaf-blind, blind, developmentally delayed, intellectually disabled, language deprived, and literacy challenged. We combine the purposes of a research and information centre, advisory council, representative body, self-help society, and community action group. We are the oldest national-level disabled consumers organization in Canada. CAD-ASC is

affiliated with the World Federation of the Deaf (**WFD**), and is a United Nations-accredited Non-Governmental Organization (NGO) to the Convention on the Rights of Persons with Disabilities.

**DWCC-CSSSC's** mandate is to advocate for accessible wireless communications equality for DDBHH Canadians including but not limited to:

- a. Cost reasonable accessible wireless data plans for ASL and LSQ users for two-way video calls.
- b. Accessible industry-wide promotions of wireless services and products.
- c. Removal of disparities in costs of the same accessible wireless products and services within each company.
- d. Provision of functional equivalent wireless products and services including wireless applications (apps).
- e. Accessible wireless emergency services (including emergency alerts and direct text to 911).
- f. Nationwide public awareness, education and outreach on current accessible wireless and mobile communication products and services.

**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, promote public awareness of deaf-blind issues and gather and distribute information in order to help empower individuals who are deaf-blind to become full participants of society. CNSDB provides expertise in accessibility related to the needs of individuals who are living with the distinct disability of deaf-blindness, which is different from deafness or blindness due to being unable to use one sense in order to compensate for the loss of the other.

4. CAD-ASC et al. have reviewed:
  - a. CRTC's release of Telecom Notice of Consultation 2021-102 proceeding.
  - b. CRTC's letter to Sue Decker of the Canadian Administrator of VRS [**CAV**]
  - c. CAV's submitted procedural request dated March 22, 2021.
  - d. Deaf and Hard of Hearing Coalition [**DHH Coalition**] procedural response dated March 24, 2021.

## **Extended Deadlines**

5. In the 11 March 2021 letter to Sue Decker, the CAV was given the deadline of **26 April 2021** to respond to questions from the CRTC.
6. In a letter dated 22 March 2021, CAV wrote requesting to change their date to **17 May 2021** and then subsequently change the dates set out on paragraph 8 from **9 June 2021** to **21 June 2021**.

## CAD-ASC et al.'s response

7. After consultations with our affiliates and getting their feedback and concerns, CAD-ASC et al. support CAV's request to change their date to **17 May 2021**.
8. After all parties have submitted their initial interventions, the individuals, nonprofit groups, and organizations with limited resources, need to have time to review, discuss and consult with the community **and** respond to CAV's filing.
9. Therefore, CADASC et al. requests an extension of 14 days to CAV's suggested deadlines for parties to respond to CAV's submission and to comment and submit interventions, to a new deadline of **5 July 2021**.
10. CAD-ASC et al. supports **9 August 2021** as the deadline for the reply to interventions that CRTC established.
11. The CAD-ASC et al. appreciates the Commission's attention to these matters and looks forward to a positive response. Should you have any questions, please feel free to contact us at the e-mail addresses below.

Regards,

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CC: Sue Decker, Executive Director, CAV  
Jennifer Porteous, CRTC  
Nanao Kachi, CRTC

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