



**Canadian Deaf-Blind Collective**  
**% Canadian National Society of the Deaf-Blind**  
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**June 4, 2021**

Mr. Claude Doucet  
Secretary-General  
Canadian Radio-television and Telecommunications Commission (CRTC)  
[sec-gen@crtc.gc.ca](mailto: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) - Procedural Request Change of Date**

1. The **Canadian National Society of the Deaf-Blind (CNSDB)** plans to independently participate in this proceeding with the **Deaf-Blind Planning Committee (DBPC)**, with the full support of the Canadian Association of the Deaf-Association des Sourds du Canada (CAD-ASC) and the Deaf Wireless Canada Consultative Committee (DWCC).
2. For the purpose of this collaborative effort, the CNSDB & DBPC will participate as the “**Canadian Deaf-Blind Collective,**” or “**CDBC.**” As we proceed with our research and writing, other Deaf-Blind individuals and groups may choose to add their comments and observations as part of the collective. The **CDBC** hereby submits this procedural change of date request. The Collective begins to introduce our organizations:
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 people who are 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, all who have connections to the Deaf-Blind community as allies, consumers, family, or interpreters/intervenors.

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 who are blind; with those who are Deaf-Blind, trying to provide services that are established for those who are only Deaf, or only blind, do not address the distinct differences within the unique identity of Deaf-Blind persons.

7. The CDBC apologizes for the delay on this procedural document for CRTC TNC 2021-102. The province of British Columbia (BC) is just now opening up from lengthy pandemic restrictions. The restrictions have prevented team members from meeting in person for accessible communication such as tactile sign language. Ontario has been hard hit by the pandemic and has not reopened yet, leaving many Deaf-Blind isolated and unable to communicate with each other in person for accessible communication.

8. Due to the pandemic, the Deaf-Blind have faced numerous barriers. These barriers include severe isolation due to being unable to safely travel on public transit to meet and communicate in person, being unable to see well enough to safely social distance in the community, having limited access to goods and services, difficulty in using remote communication methods due to lack of accessibility and more. This results in those who are Deaf-Blind being isolated and cut off from social support more drastically than those who are not Deaf-Blind.

9. In Ontario, because of the Provincial Health orders, services for the Deaf-Blind are still time-limited, for essential activities only, impacting the ability to use an intervenor. In the province of Ontario, each Deaf-Blind client is allocated approximately 30 hours of intervenor time per month, depending on need and availability. In the Province of British Columbia, services are much more limited. One Vancouver agency serving the Deaf, Deaf-Blind, and hard of hearing community provides up to 9 hours of intervenor time for a limited number of Deaf-Blind clients per month. Some other provinces are slowly opening up and will take time to reach the Deaf-Blind people who will participate in the survey that is planned.

10. To gather information about the Deaf-Blind experience or perspectives with Video Relay Services, rather than doing Virtual Town Halls, it is more accessible for Deaf-Blind persons to participate and provide their experiences with surveys on paper or through an electronic survey. This allows for the Deaf-Blind the ability to book and arrange the assistance of intervenors or interpreters skilled in tactile communication to complete these surveys.

11. The CDBC VRS Survey Project is driven by Deaf-Blind leadership and consultation, along with sighted Deaf assistants. Due to the combined effects of deafness and blindness, we require significantly more time to perform the same tasks as non-Deaf-Blind people. Collectively it was agreed to work with the following timeline:

- a. **June 6** - finalized DB VRS Survey Questions in English.
- b. **June 13** - French translations completed.
- c. **June 14 - 21** - ASL & LSQ translations & video editing for DB VRS Survey.
- d. **June 21** - Begin embedding of YouTube videos into Survey Monkey.
- e. **June 28 - July 28** - Survey Period (to be accessible to Deaf-Blind must have a 4-weeks survey period).
- f. **July 28** - Survey ends.

**Team pauses to attend a 3-day virtual Annual General Meeting.**

- g. **August 2 - 5** - Data entry of paper surveys into Survey Monkey.
- h. **August 6 - 9** - Data extraction from Survey Monkey.
- i. **August 10 - 14** - Charts graphs created from qualitative data.
- j. **August 15-19** - Visual descriptions of each of the charts for all those who are Deaf-Blind and Blind (accessibility).
- k. **August 20-24** - Deaf-Blind analysis of data and charts for each question.
- l. **August 24 - September 7** - Deaf-Blind VRS Survey Results Report Writing period.
- m. **Sept 8** - Final Report submitted to CRTC 2021-102.

**12.** The **Canadian Deaf-Blind Collective** hereby requests that the **Deaf-Blind Survey Report** submission date is set for **September 8, 2021**, as a procedural change of date request to the CRTC for TNC 2021-102: Review of Video Relay Services.

**13.** We understand and regret that our request may result in some inconvenience. However, due to the combined effects of deafness and blindness, we require significantly more time to perform the same tasks as non-Deaf-Blind people. Plus we must frequently wait for the availability of limited intervenor services. Additionally, one of our key team members has been dealing with health issues the last few weeks and is just now getting back to being able to work on this proceeding.

**14.** As such, we need additional time accommodation in order to fully participate and represent our needs in this proceeding. It is important for us to stand independently and speak for ourselves as Deaf-Blind, because of the very reason that Deaf-Blind were not included in previous VRS related proceedings, resulting in the VRS system not being fully accessible to us. As such, it is essential that we be able to be fully included now.

**15.** CDBC appreciates the opportunity to participate and sincerely hopes for positive support for the Deaf-Blind participation in this proceeding. As a final reminder, all documents submitted to the record must also be submitted in MS WORD format so it is accessible to screen readers for Deaf-Blind participants.

**16.** 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](mailto:CDBC.VRS@gmail.com).

Thank you,

Megan McHugh, President  
Canadian National Society of the  
Deaf-Blind (CNSDB)  
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Terri Nolt, Chair  
Deaf-Blind Planning Committee  
(British Columbia)  
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cc: Sue Decker, Executive Director, Canadian Administrator of Video Relay Services (CAV)  
Carmelle Cachero, Chief of Staff, Canadian Administrator of Video Relay Services (CAV)  
Jennifer Porteous, CRTC  
Nanao Kachi, CRTC  
Megan McHugh, President, CNSDB  
Terri Nolt, Chair, DPBC  
Patricia Spicer, Saskatchewan Deaf & Hard of Hearing Services (SDHHS)  
Wissam Constantin, Vice President, Canadian Association of the Deaf (CAD-ASC)  
Lisa Anderson, Acting Chair, Deaf Wireless Canada Consultative Committee (DWCC)  
Kimberly Wood, Founder, Canada Deaf Grassroots Movement (CDGM)  
Gary Malkowski, Director, Sign Language Institute of Canada (SLIC)  
Kyle Badree, President, Alberta Association of the Deaf (AAD)  
Gordon Rattray, Treasurer, Okanagan Valley Association of the Deaf (OVAD)  
Kevin Goodfeather, President, Regina Association of the Deaf (RAD)  
Magda Chmielinski, President, Toronto Association of the Deaf (TAD)  
Travis Morgan, Vice President, Ontario Association of the Deaf (OAD)  
Sarah Stadnicki, Committee Member, Ontario Video Relay Services Committee (OVRSC)  
Kimberly Wood, Community Facilitator, BC Video Relay Services Committee (BCVRS)  
DHH Coalition - OAD, NLAD, DAANS:  
Donald Prong, Executive Director, Ontario Association of the Deaf (OAD)  
Myles Murphy, Executive Director, Newfoundland and Labrador Association of the Deaf (NLAD)  
Elliott Richman, Executive Director, Deafness Advocacy Association of Nova Scotia (DAANS)

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