



Canadian Deaf-Blind Collective
% Canadian National Society of the Deaf-Blind
405-422 Willowdale Ave, North York, ON M2N 5B1
cdbc.vrs@gmail.com

June 8, 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) - Procedural Request.

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**"
2. The CDBC.VRS wrote an administrative, procedural letter to the record with requests for CAV's responses to CRTC's RFI in WORD documents, a total of 70 documents. CDBC.VRS is responding to CAV's letter in addition to additional comments.
3. CDBC.VRS asked the CRTC for the Reply to Interventions deadline to be extended to **14 days** from the original deadline to **July 25, 2022**. The rationale was that the 14 days would be the same length of time that CDBC.VRS had to wait for the MS WORD documents from the CAV.

CAV's Response

4. On May 30, 2022, CAV sent a letter to the CDBC.VRS, acknowledging the CDBC.VRS procedural letter. The CDBC.VRS team acknowledges CAV's response and expresses thanks for this response.

5. CAV attached 15 documents from its Intervention in MS WORD files. The CDBC.VRS expresses its gratitude for the 15 intervention documents in MS Word. Thank you.
6. However, CDBC.VRS noticed no comments from CAV in the letter expressing a willingness to submit the 70 RFI response documents for both English and French in MS WORD.
7. The CDBC.VRS members consider that CAV may be waiting for direction from the CRTC. However, the Deaf-Blind members would have liked to have received an indication of CAV's willingness to submit these documents in the appropriate accessible Word files for Deaf-Blind participants to have equitable participation in the proceeding.
8. The CDBC.VRS has four Deaf-Blind team members ready and willing to read all of these documents to begin their analysis and create responses with their Deaf collaborators. The teams are anxious to receive the files in MS WORD directly from the CAV. This arrangement would be preferable, as converting the PDF documents into WORD is time-consuming, and there could be technical problems in the conversion process.
9. Deaf-Blind participants deserve the opportunity to participate in the proceeding on an equal footing as their Deaf and hearing colleagues. The team members are keen to do their part to provide their input into the review process to make SRV Canada VRS the best it can be.

MS Word document files from the interveners

10. In addition, CDBC.VRS had requested all participants in this proceeding to provide their documents in the alternative format of MS WORD files within seven days of the letter's date, **on or before May 26, 2022.**
11. CDBC.VRS has received responses from Telus and OVRSC-COSRV to the request for direct emails from the other participating telecoms or interveners in the proceeding with MS WORD documents sent directly to its email address. Thank you for these documents.

Dates and Deadlines

12. The rationale CDBC.VRS provided for the deadline of July 25, 2022, was that the 14 days would be the same length of time that CDBC.VRS had to wait for the MS WORD documents from the CAV.
13. It has now been 20 days, and CDBC.VRS would like to point out that the more time we do not get a response from CRTC or receive the WORD documents, the more time the Deaf-Blind team will need to participate equitably.
14. The CDBC.VRS team sincerely does not want to drag the deadline too much longer, but the reality is that the more time it takes to receive the documents, the more time the Deaf-Blind team needs to read and review documents. Therefore the final deadline CDBC.VRS requests is **Friday, July 29, 2022**, for the reply phase of this proceeding.

Virtual Discussions Dates

15. CDBC.VRS expressed its desire to participate in the virtual discussions related to TNC 2021-102. However, it is very concerned about many of its members being busy organizing for and then away at the Canadian Deaf-Blind Camp from August 26 to September 2, 2022. This is true for at least two of the Deaf-Blind members of CDBC.VRS involved in organizing this Camp.
16. In addition, intervenors and Deaf Interpreters would be preoccupied and unavailable while at the Camp. Therefore resources for accessibility will not be available for their equitable participation in these virtual discussions. We want to point out that some provinces, such as Ontario, have limited numbers of intervenors or limited hours of services (as in British Columbia).
17. A gentle reminder, Deaf-Blind individuals who require intervenors to participate in these discussions, need **three to four weeks' notice** to arrange for intervenors to assist them with these virtual events. Thus, the CDBC.VRS sincerely requests that the Deaf-Blind be able to participate in such a virtual discussion after the Camp, that is, **after September 5, 2022**.

Closing

18. CDBC appreciates the opportunity to participate and sincerely hopes for the positive support for the Deaf-Blind involvement in this proceeding.
19. If you have any concerns or questions, please contact **Megan McHugh or Terri Nolt** at the **separate emails** in our signatures below **and** the shared email address CDBC.VRS@gmail.com.

Thank you,

Megan McHugh, President
Canadian National Society of the
Deaf-Blind (CNSDB)
mchugh.mm@gmail.com

Terri Nolt, Chair
Deaf-Blind Planning Committee
(British Columbia)
dbpc2.0@gmail.com

cc: Sue Decker, Executive Director, Canadian Administrator of VRS (CAV-ACS)
Jennifer Porteous, CRTC
Nanao Kachi, CRTC
Megan McHugh, CNSDB
Terri Nolt, DPBC

cc continued:

Wissam Constantin, Canadian Association of the Deaf (CAD-ASC)
Jeffrey Beatty, Deaf Wireless Canada Consultative Committee (DWCC)
DHH Coalition - Donald Prong, Ontario Association of the Deaf (OAD)
Myles Murphy, Newfoundland and Labrador Association of the Deaf (NLAD)
Elliott Richman, Deafness Advocacy Association of Nova Scotia (DAANS)
Sarah Stadnicki, Ontario Video Relay Services Committee (OVRSC)
Kimberly Wood, Canada Deaf Grassroots Movement
Ursula Grant, Canadian Wireless Telecommunications Association (CWTA)
Telus Regulatory
Rogers Regulatory
Bell Regulatory

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