



Canadian Deaf-Blind Collective
% Canadian National Society of the Deaf-Blind
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May 19, 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 Document.

- 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 is pleased to have submitted its intervention and survey report.**
- 3. Now we have some administrative matters that need to be submitted procedurally.**
- 4. The Collective takes this opportunity to update all participating in the proceeding with this procedural document with its four main focal points as follows:**
 - A. Reminder of Correct Email Contact Information**
 - B. CAV Submitted Documents**
 - C. CRTC’s Online File Organization System**
 - D. Joint Reply to RFI Answers and Reply to Intervention**

A. Reminder of Email Contact Information

5. Members of the CDBC.VRS have been receiving emailed submissions by various participants in CRTC 2021-102 and other CRTC proceedings at incorrect email addresses and feel it violates privacy and professional boundaries. Participants of the proceedings need to respect these boundaries and have the correct email addresses for our group members, especially when individuals and groups get multiple emails from other respondents.
6. The CDBC.VRS had made this point in TWO procedural letters to the CRTC related to the TNC 2021-102 proceeding - the first dated June 4, 2021, and the second on August 16, 2021.
7. In addition, the Deaf-Blind project leads, specifically Ms. Terri Nolt, Chair of the Deaf-Blind Planning Committee (DBPC), have preferences for which email types go to which of their email accounts especially as it may be challenging to locate important messages in their inboxes. **Ms. Nolt, therefore, requests that her name and personal email be removed from this and all future proceeding distributions.**
8. From now on, our participating group **again asks** that any participants in the CRTC submissions or comments for the proceeding TNC 2021-102 are asked to please use these three email addresses:
CDBC-VRS: CDBC.VRS@gmail.com
DBPC Chair: dbpc2.0@gmail.com,
CNSDB President: mchugh.mm@gmail.com
9. These email addresses are to be used for the group for the remainder of the TNC 2021-102 AND **all** future CRTC proceedings.

B. CAV Submitted Documents

10. With the Accessible Canada Act in effect, it is required to be inclusive of persons with disabilities who are participating in this proceeding. CDBC.VRS is a group made up of a majority of individuals who are Deaf-Blind and Deaf with low vision.

11. As CDBC.VRS prepares to respond to the next phase of documents it finds it cannot proceed without addressing a breach of the CRTC Rules of Practice and Procedures regarding accessibility. The members refer to the relevant section, as copied below:

The CRTC Rules of Practice and Procedure¹

Filing and Service of Documents

Alternative format

14 (1) A person with a disability or their designated representative may request that a party whose document has been posted on the Commission's website file the document with the Commission in the alternative format specified by the person or representative. The request must be served on the **party within five days after the day on which the document was posted.**

Response to request

(2) Within five days after the day on which a party was served with the request, the party must file with the Commission and serve on the person or representative

(a) the document in the specified alternative format or in an alternative format that was agreed to by the person or representative; or

(b) the reasons why the party cannot file the document in an alternative format.

12. Therefore, CDBC.VRS is specifically requesting all participants in this proceeding to provide their documents in the alternative format of MS WORD documents **with a background of its experience below:**

C. Accessible documents - Word vs. PDF

13. CDBC.VRS reminds CAV and every other participant in the proceeding that it sent procedural documents on **June 4, 2021**, and again, on **August 16, 2021**, where they explained: "...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."

¹ CRTC Rules of Practice and Procedure - [Canadian Radio-television and Telecommunications Commission Rules of Practice and Procedure \(SOR/2010-277\)](#)

14. All of the files, 70 RFI Answer documents, and 15 intervention files submitted by the CAV have been provided only in PDF format. CAV did not submit WORD documents for any of its RFI answers.
15. CDBC.VRS did explain that PDFs are **not accessible** to Deaf-Blind. The PDF documents are not accessible to screen readers or braille readers to send to refreshable braille boards on a reliable basis.
16. And for Deaf or hard of hearing persons with low vision, PDFs are **not accessible** because they cannot be changed in terms of font type and size, bold font, or a different colour. All of these changes are possible in a Word document.
17. Therefore, for CDBC.VRS to respond to these RFI documents and the InterventionS, our team **officially files this request**.
18. CDBC.VRS **asks** that CRTC order CAV to convert **all of its documents** into MS WORD files for accessible reading and reviewing for Deaf-Blind and hard-of-hearing low vision members to fully participate in the Reply phase.
19. CDBC.VRS **requests** that all of these CAV documents be sent in MS Word files to the team **within 14 days of receiving this letter**.
20. Additionally, for every other participating organization, CDBC.VRS **requests** that they email an MS Word copy of their Intervention. If there is only one file in MS Word format, it can be sent to CDBC.VRS@gmail.com **within seven days**.
21. This way, the Deaf-Blind members can have an equitable experience participating in this Reply phase of the proceeding.
22. Out of fairness and communication & information equity of the Deaf-Blind group participating in this proceeding, with the delay in receiving these documents; and to give the Deaf-Blind team time to read all of the 85 documents from the CAV plus the other parties' interventions, CDBC.VRS requests that the Reply to Interventions deadline be extended to **14 days** from the original deadline to **July 25, 2022**. The 14 days is the same

length of time that CDBC.VRS has to wait for the MS WORD documents from the CAV.

D. CRTC's online file organization system

23. When the CDBC team members tried to find the CAV's response (to CRTC RFI) documents, they discovered that the online location containing all the files with CAV's replies was impossible to navigate with the English and French files mixed up together in a folder and that **all** these files were not categorized or separated into folders by topic, a total of approximately 70 files in **each language** from the CAV alone.
24. One team member spent four hours making sense of all the documents and re-organized only the English files in folders after finding the original RFI from the CRTC, to which the CAV had answered. They used that RFI as a guide to organizing the folders. This person was a sighted Deaf member of the team.
25. CDBC.VRS **requests that CAV send the MS Word files in correctly numbered and short-named files, organized in folders.** These can be sent in a zip folder, making it easier for the Deaf-Blind participants to navigate the folders.

D. Joint Reply to RFI Answers and Reply to Intervention

26. There are two sets of documents that all groups have to review and navigate: the 70 documents from the CAV, its RFI Answers to CRTC, its 15 documents filed as an intervention, and the incoming interventions from all the other parties.
27. After all this confusing document navigation, four Deaf-Blind team members will try to read these files, but those with vision challenges need others to assist in navigating the documents. Thus our team discussed the issue with the DWCC and agreed on the following proposal.
28. The CDBC.VRS team wishes to inform CRTC that it intends to pool its resources with the DWCC team to get the assistance it needs and jointly

respond for the reply phase.

Closing

- 29.** CDBC appreciates the opportunity to participate and sincerely hopes for the positive support for the Deaf-Blind involvement in this proceeding.
- 30.** 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**](mailto: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

List of Participants served on the following page:

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 (CDGM)
Ursula Grant, Canadian Wireless Telecommunications Association (CWTA)
Telus Regulatory
Rogers Regulatory
Bell Regulatory

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