



Mr. Claude Doucet  
Secretary-General  
Canadian Radio-television and  
Telecommunications Commission (CRTC)  
Ottawa, ON K1A 0N2

August 18, 2022

**Telecom Notice of Consultation CRTC 2021-102 Review of Video Relay Services -  
CDBC.VRS-DWCC - CONFIDENTIAL Supplementary Document – Response to CDGM**

Dear Secretary-General,

**Re: Response to CDGM's August 15, 2022 Request for Disclosure of Information**

1. The Canadian National Society of the Deaf-Blind (**CNSDB**) is a national consumer organization established in 1985 and a registered charitable organization since 1996. Its mandate includes advocating for new and improved services for people who are Deaf-Blind, promoting public awareness of Deaf-Blind issues, and gathering and distributing information that will help people who are Deaf-Blind to become full members of society.
2. The Deaf-Blind Planning Committee (**DBPC**) is an organization based in the Lower Mainland of British Columbia, created in 2012 - allied with several Deaf-led and Deaf-Blind-led organizations and service agencies to advocate for communication access and support services for Deaf-Blind British Columbians. These two groups participate in this proceeding as the “**Canadian Deaf-Blind Collective**” or “**CDBC.VRS.**”
3. CDBC.VRS is also collaborating with the Deaf Wireless Canada Consultative Committee- Comité pour les Services Sans fil des Sourds du Canada (**DWCC-CSSSC**), established in 2015 to advocate on behalf of the Deaf community in telecommunications proceedings. CNSDB and DWCC have worked together since 2016 in various CRTC proceedings, while DWCC has participated in almost two dozen proceedings over the years, the most recent work including 17 team members.
4. On August 8, 2022, the groups filed a joint response in this proceeding as “**CDBC.VRS-DWCC.**” The request for confidentiality was made pursuant to subsection 39(1)(c)(ii) of the *Telecommunications Act*. We explained that disclosing the information may prejudice future commercial negotiations. We provided a redacted version for the public record.

5. On August 15, 2022, the Canada Deaf Grassroots Movement (CDGM) wrote the CRTC to say that CDGM does not “see any grounds for CDBC.VRS-DWCC having their budget completely redacted” (CDGM Request for Disclosure of Information [RDI], para. 2) and requested that the CRTC deny CDBC.VRS-DWCC’s request for confidentiality.
6. CDGM began by misrepresenting the information provided as CDBC.VRS-DWCC’s “budget” – which it is **not**. CDBC.VRS-DWCC provided the CRTC with a summary estimate of the financial impact of serving the needs and interests of the Deaf-Blind community.
7. CDGM then ignored CDBC.VRS-DWCC’s clear explanation of its request for confidentiality and made an irrelevant comparison between the requests for confidentiality of CAV and CDBC.VRS-DWCC. CDGM also misunderstood the foundation of our argument concerning the prejudice that disclosure will bring to future commercial negotiations. We are pleased to provide clarification.
8. CDGM argued that CDBC.VRS-DWCC “did not specify let alone explain the exact grounds on which the CRTC may keep the abridged budget confidential under sections 5 and 7 of the CRTC Rules of Practice and Procedures” (CDGM RDI, para. 2).
9. **In fact, CDBC.VRS-DWCC explained its grounds for requesting disclosure**, specifically stating in paragraph 4 that “disclosure of certain details may prejudice future commercial negotiations in this matter.” As CDGM’s argument simply misstates reality, the CRTC should dismiss it.
10. CDGM also expressed its view that CDBC.VRS-DWCC will never “be part of negotiations to make VRS Deaf-Blind friendly should CRTC so mandate” (CDGM RDI, para. 8).
11. Even if CDGM’s view were relevant in this matter - and it is not - **the fact is that CDBC.VRS-DWCC’s request for confidentiality did not at any time state the CDBC.VRS-DWCC’s desire to be part of negotiations** to ensure the accessibility of Canada’s telecommunications system. As CDGM’s statement is both incorrect and irrelevant, the CRTC should dismiss it.
12. CDGM also argues incorrectly (CDGM RDI, at para. 2) that CDBC.VRS-DWCC “will not face any prejudice of future commercial negotiations in this matter.” It repeats (at para. 8) that CDBC.VRS-DWCC “will not suffer any prejudice under subsection 39(1)(c)(ii) of the Telecommunications Act if the abridged budget become [*sic*] public.”

13. **Please note paragraph 4 of our request stated that “disclosure of its details may prejudice future commercial negotiations in this matter.”** The commercial negotiations to which we refer involve a third party that provided information to us. The party specifically asked that we respect this confidentiality so as not to prejudice *their* future commercial negotiations. (Should the Commission request, we would be pleased to provide the CRTC with written correspondence confirming this request, **in confidence**.) The CRTC should dismiss CDGM’s argument concerning the potential impact on CDBC.VRS-DWCC as it is based on CDGM’s misunderstanding of our request.
14. CDGM argues as well that CDBC.VRS-DWCC should disclose information because CAV disclosed information. (CDGM RDI, para. 6). While CAV made public certain information for administration, Board, Professional Services, Operations and Wages, **CDGM has not explained why CAV’s disclosure of its own information is relevant to CDBC.VRS-DWCC’s request for confidentiality** concerning the information provided by a third party that has requested confidentiality. The CRTC should dismiss this apples-with-oranges comparison of CDBC.VRS-DWCC and CAV by CDGM.
15. Next, CDGM argues (CDGM RDI para. 7) that disclosure of the information provided by CDBC.VRS-DWCC would help interested parties “better understand and hence advocate exactly what making VRS Deaf-Blind friendly means from a financial perspective.” Apart from claiming to represent the interests of Deaf-Blind consumers, **CDGM has not explained its own expertise in ensuring that budgets are comprehensive and reasonable, nor has it explained why it specifically requires additional details of the third-party information obtained by CDBC.VRS-DWCC** and provided to the CRTC for its review.
16. The record of this lengthy proceeding establishes that all parties understand the intricate details of the social, legal, and technical issues related to accessibility, including the finances involved, due in part to CAV’s disclosure of its own information. Nothing, moreover, prevented any party during the past fifteen months of this proceeding from undertaking their research about matters relevant to this proceeding and of interest to them, as CDBC.VRS-DWCC did. While bearing in mind that CDGM misunderstood that CDBC.VRS-DWCC’s request for confidentiality was made to respect the request of a third party; we respectfully submit that in this specific case, the public interest in seeking more information for the sake of more information does not outweigh a third party’s request that its position in future commercial negotiations not be harmed.

17. Finally, CDGM wrote that “the abridged supplementary document is related to the Deaf-Blind’s Accessibility tools. We believe that this part needs to be disclosed due to what it is purposed for, and to elaborate so we can work together to provide better accessibility for Deaf-Blind Users to be able to use VRS” (CDGM RDI, para. 3).
18. If we correctly understand CDGM, and because of all parties’ common goal of working together to improve and expand accessibility for all users of Canada’s telecommunications system, **CDBC.VRS-DWCC is pleased to provide additional detail in the attachment while otherwise maintaining our request for confidentiality for the remainder of the information provided** in confidence to the Commission to respect the third party’s request for confidentiality.
19. To conclude, the request for confidentiality was submitted by CDBC.VRS-DWCC fully complied with the CRTC’s *Rules of Practice and Procedure*. We respectfully submit that the harm to a third party from disclosing this information outweighs its potential benefit. That said, we have provided additional information about the material, which is attached for the public record.

Sincerely,

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cc Jennifer Porteous, CRTC  
Nanao Kachi, CRTC  
Parties to TNC 2021-102

**ABRIDGED Supplementary Document to TNC 2021-102**

**For inclusion on the public record**

**REVISED August 18, 2022**

**Description**

20.                    has developed apps for Deaf-Blind consumers                    would  
provide technical solutions for the Deaf-Blind community
21.                    regardless of who makes the call.
22. Other user groups would benefit from the fact that specialized apps could be available to them  
as well.
23.                    interoperable using RTT RFC 4103 SIP-enabled FCC SIP interoperability.<sup>1</sup>

**Deaf-Blind Technical Platform Breakdown**

24. Technical platform cost
- 25.
- 26.
27. Year 1 Total
- 28.
29. Year 2+ Total

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<sup>1</sup>        FCC - [SIP Forum VRS US Providers Profile TWG-6.1 | Federal Communications Commission](#)

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