

Final Reply Comments

from

Deaf Wireless Canada Consultative Committee (DWCC)



for its participation in

TNC CRTC 2021-102

Call for Comments - Review of Video Relay Services

October 19, 2023

Table of Contents

Table of Contents	1
Executive Summary	3
Mandate	5
General Comments	5
CRTC's Initiative	5
Comments about SRV Canada VRS	6
Comments about CAV	7
Users' experiences with using VRS	7
General Comments	7
Communication Equity	8
General Comments	8
Communication Disparity	8
VRS Platform	9
General Comments	9
IVèS Technical Platform	9
Dysfunctional Technical Platform	10
Choice of VRS Provider	10
Call connection	11
Interpreter	12
General Comments	12
SRV Canada VRS Announcement	12
Connection	13
Personal Stories	13
Other Comments	14
Features in VRS App	15
Basic Features	15
Chat Box	15
Notifications	15
Time Ticker	16
Multi Party Screen	16
Work VRS Phone Number	16
Point-to-Point Video Calls	17
Outages	18
Education and Public Outreach	18
Community Outreach	19
Equipment Supports	20
Users' experiences with using 9050	21
General Comments	21
Choice of language use	21
Community Engagement	22

Communication from CAV	22
VRS Support Persons	23
Features Suggestions	23
Complaints Directly to CRTC and CCTS	24
Communication Equity	24
Interpreter	25
Users' experiences with using VRS 9-1-1	25
General Comments	25
Communication Equity	26
Connection to VRS 9-1-1	27
Positive Experiences	27
Negative Experiences	28
Accessibility for Deaf-Blind Persons	28
General Comments	28
Barriers to SRV Canada VRS	29
Equality for Deaf-Blind VRS users	29
Inclusion of Deaf-Blind Persons	30
Accessibility Needs	30
Customization of Font Size and Colours	30
Background Colour	31
Clothing and Others	31
Interpreters	31
Pacing of Signing	31
Direct Communication	32
Other Comments	32
Communication Options	32
General Comments	32
Tactile Signing	33
Keyboard to Braille	33
Independence	33
Users' Experiences with 9050	34
Users' Experiences with VRS 9-1-1	34
Closing comments	35
Conclusion	35

Executive Summary

ES1: In this final reply of video relay services for CRTC Telecom Notice of Consultation 2021-102, DWCC highlights Deaf-Blind accessibility to Canada's VRS and the importance of significantly improving SRV Canada VRS to achieve true communication equity. DWCC appreciated being involved in this proceeding and given a chance to provide its experience with the SRV Canada VRS since 2016.

ES2: A DWCC member had focused on watching the virtual discussion videos and making their own notes in English. The representative wanted to use their primary language, ASL, to see what was shared and discussed by the individuals and groups. This final reply report was largely written from the notes in English and by collaboration among several members of DWCC.

ES3: DWCC is a committee made up of members from coast to coast to coast, striving for a balance of members across varied regions and genders, including a French and LSQ member, an ally of the Deaf-Blind community, and members who identify as 2SLGBTQIA+.

ES4: Overall, DWCC is pleased with the SRV Canada VRS and the administration. The document will note systematic deficiencies that need to be addressed and offer ideas and perspectives to improve these gaps.

ES5: There needs to be greater focus by CAV on communication equity where video calls don't get interrupted, the app doesn't needlessly crash, the technical platform isn't viewed as "ancient", there are no artificial barriers to accessibility, and VRS 9-1-1 calls are just a button away. This means replacing the technical platform must be a top priority of CAV and the CRTC.

ES6: Additionally, DWCC suggests CAV to not be reactive to community suggestions and feedback by waiting for the feedback coming from the submissions in this and future VRS reviews to implement them. It is encouraged that CAV engages and communicates more with the community on what's happening behind the scenes. This will reassure VRS users that CAV is striving to enhance VRS for a streamlined VRS experience.

ES7: Cultural sensitivity must be a core value for CAV and SRV Canada VRS. CAV needs to take steps to increase its accessibility to Deaf-Blind users to ensure community equity for this particular vulnerable group of persons who are part of the signing community. Deaf-Blind persons are not like hearing persons nor sighted Deaf persons. The 2014 VRS standards have unintentionally marginalized them, thus there needs to be updated regulatory policies and standards to reflect this.

ES8: The ACA and the 2023 Policy Direction (items 2b. and 17c.)¹ to the CRTC are now in effect, and this means there needs to be greater investment into communication accessibility, particularly the recognition of ASL and LSQ as the primary languages of Deaf persons in Canada. This means investing more human resources in direct communication via ASL or LSQ. It also means increased resources to accommodate those with specific needs, particularly Deaf-Blind persons who need specialized communication equipment and tactile signing.

¹ Order Issuing a Direction to the CRTC on a Renewed Approach to Telecommunications Policy - [link](#)



DWCC's Final Reply Comments to CRTC TNC 2021-102 Call for comments – Review of video relay service

Mandate

1. The Deaf Wireless Consultative Committee (DWCC) has a mandate that describes the Committee members advocating for accessible wireless telecommunications equity for DDBHH Canadians, including, but not limited to:
 - a) Cost-reasonable accessible wireless data plans for any ASL, LSQ, or ISLs user 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 communication equity in all 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 accessible wireless and mobile communication products and services.

Final Response

2. An ASL version is being submitted with only DWCC's perspectives as responses, comments with either support or oppose comments made by other groups during the virtual discussion.
3. The written version includes all the commentary from the other groups during the virtual discussions as well as DWCC's perspectives. DWCC begins with comments on CRTC's Initiative below.

General Comments

CRTC's Initiative

4. DWCC applauds the CRTC for simultaneously providing ASL-English and LSQ-French interpretation for the VRS virtual discussion.
5. The CRTC providing ASL-English and LSQ-French interpretation simultaneously shows they recognize ASL and LSQ as the primary languages of Deaf people in Canada, according to the Accessible Canada Act.
6. DWCC applauds the CRTC commissioners, Joanne, Alicia, and Nirmala, for taking the initiative to learn how to fingerspell their names and some basic greeting signs to be inclusive and show respect to ASL as one of the primary languages of Deaf people in Canada.
7. DWCC was also impressed with the CRTC commissioners providing visual descriptions of themselves and their backgrounds, thus giving visual information to Deaf-Blind persons.

Comments about SRV Canada VRS

8. Many individuals and groups in the VRS virtual discussion expressed gratitude for having VRS in Canada.
9. DWCC also expresses its gratitude that this service makes it possible for Deaf persons in Canada to make and receive calls to and from hearing persons.
10. Among all the groups, there was a strong consensus that the ability to make and receive calls in the primary languages of ASL or LSQ was the best feature of VRS.
11. The DHH Coalition stated that VRS narrows the gap between the Deaf and hearing communities but has limitations and barriers. The DHH Coalition believes VRS can be improved.
12. CDGM said that VRS makes Deaf people feel connected to the world and gives them greater independence as they no longer have to rely on another person to make calls for them.
13. OVRSC indicated that they like making calls via VRS in their primary language, ASL and that this is the best feature of using VRS.

14. DWCC wholeheartedly agrees that VRS has narrowed the gap between the Deaf community and hearing community and made DDBHH persons feel connected to the hearing world via their primary languages, ASL and/or LSQ.

Comments about CAV

15. Leonor Vlug thought that the CAV is “reactive” and not thinking of the community in general and perhaps not enough attention focused on Deaf-Blind VRS users.
16. DWCC wants to point out that the report is in response to the virtual discussions and that they are aware that CAV has made some improvements during the VRS review.
17. DWCC is in agreement that CAV is reactive and wonders why it has to take a VRS review to have these changes implemented despite that many of them were recommended prior to the review.

Users’ experiences with using VRS

General Comments

18. CAD-ASC said that VRS is an empowerment to DDBHH that wasn’t there in 1867 and 1967 and that it is the federal government’s responsibility for that empowerment, not CRTC.
19. CAD-ASC thought that VRS on a handheld phone is a wonderful accommodation for those who use sign language and appreciates that, but feels that the current state of VRS is limited and sub-par.
20. Darrell Villa expressed that DDBHH persons are already suffering and questions why VRS is adding to their suffering. That’s the equivalent of double suffering, and VRS needs to be improved significantly.
21. DWCC wants to state that for the purpose of this response paper, “communication equity” also includes “functional equivalency” as some of the individuals or groups may use this term instead.

22. DWCC values communication equity, as defined by Christopher Soukup of the Communication Services for the Deaf (CSD),² and the comments above highlight evidence that Canada has yet to achieve true communication equity.

Communication Equity

General Comments

23. Darrell Villa said that there needs to be more communication equity for Deaf persons with hearing persons.
24. DHH Coalition said that in its present state, VRS is not functionally equivalent as Deaf persons cannot make nor receive calls with systematic ease, freedom, and convenience equivalent to their hearing counterparts.
25. DHH Coalition stated that functional equivalency is having all callers, hearing and Deaf, to have the same user experience when connecting with anyone, anywhere, anytime through the phone system.
26. Leonor Vlug, as a representative of the CDBC.VRS, believes that we have not yet reached communication equity and that sometimes it means having to give more to get the same level of access as hearing consumers have.
27. DWCC agrees with Darrell Villa, DHH Coalition, and Leonor Vlug/CDBC.VRS that Canada's VRS has not reached the communication equity that Canadian VRS users deserve.

Communication Disparity

28. Darrell Villa shared his experience of using Sorenson in the U.S. where he ordered pizza by clicking on the phone number and it automatically went to VRS. This is not possible in Canada and he is infuriated by it as have to work more to make a simple call.
29. CAD-ASC feels that hearing persons have a more user-friendly way to make calls while Deaf persons have to take extra steps to make VRS calls.
30. DWCC agrees with Darrell Villa and CAD-ASC that the VRS platform needs to be more user-friendly.

² [Communication Equity](#) (Eltouny, Leila, 17 August 2021)

31. CAD-ASC said that hearing persons cannot have a VRS number, thus it forces them to use Zoom, FaceTime, etc. to make video calls.
32. DWCC disagrees with the CAD-ASC about hearing people having a VRS number however states that the ability to integrate Zoom into VRS should be taken into consideration for full communication equity, as we have already mentioned in our Intervention for this proceeding.³
33. DWCC also would like to point out that the topic about having more than one person on the screen as communication equity is going to be elaborated on later in this document.

VRS Platform

General Comments

34. Darrell Villa feels the platform technology is too far behind and not up to modern specs. He gave a metaphor of where he thought the platform is equivalent to the 1980s and that there's an attitude of "Here is VRS. That is good enough, and it is better than nothing."
35. Darrell Villa feels strongly that we deserve a better technological platform and a better design and takes into consideration additional accessibility needs to reduce the barriers to using VRS.
36. DWCC agrees that the current technical platform is considered "ancient" and needs to catch up with the current technology. CAV is stalling and depriving Canadian VRS users of the best high-quality standards of video communication platforms.

IVèS Technical Platform

37. Darrell Villa wants IVèS thrown out as that platform is frustrating and thinks the problem will worsen if CAV sticks with IVèS.
38. Darrell Villa struggles to understand why IVèS was chosen rather than Sorenson and that there needs to be respect for what Deaf persons want rather than "hiding behind policy" or using "lack of funding" as the reason.
39. Darrell Villa wants IVèS replaced with Sorenson as he feels that there will be more satisfaction and gratitude for that platform. He said that Sorenson has

³ DWCC Intervention - [link](#) paragraph 143, page 38

already worked out all the bugs and problems, so it is now running smoothly and operates much better than IVèS.

40. OVRSC shared that they have personal knowledge that IVèS and its platform were bought by CAV simply because it was the cheapest and that it has been problematic for VRS users.
41. DWCC agrees with the fact that the IVèS technical platform has been very problematic and still questions why it was continued to be used after it was informed that other companies that tried the platform discontinued after a short time due to its poor quality, as already mentioned in previous DWCC document.⁴

Dysfunctional Technical Platform

42. DHH Coalition said that the system sometimes has poor quality and the phone call cuts off. Thus, communication was lost.
43. CAD-ASC has found the platform to be glitchy sometimes. Customers would have to shut down and restart or the app wouldn't work at all.
44. OVRSC found numerous technical dysfunctions during calls, where the app would sign out during the middle of a call or the app crashed on them.
45. OVRSC shared their experience where it took 24 hours to connect with CRA for a simple 5-minute call. This was because the platform would crash on them after 2-3 hours and then have to start the call again from scratch.
46. OVRSC thought that the 24 hours had been wasted on the interpreter because of their suspicion that CAV bought the cheapest platform and then it became more expensive in the end.
47. Leanor Vlug has had technical problems with the platform, which include connecting to the VRS app and the interpreter being glitchy and she had to resort to using the chat box to type messages to be voiced for the hearing person on the other end.
48. DWCC demands CAV to have IVèS replaced with another technical platform where it operates much more smoothly and without interruptions to calls.

⁴ DWCC Intervention - [link](#) paragraph 100-104, page 30.

Choice of VRS Provider

49. DHH Coalition pointed out that hearing persons can choose any phone, any phone, any phone company they want while Deaf persons are limited to just one VRS provider.
50. DHH Coalition shared that Deaf persons in Canada are limited to just one VRS provider while the U.S. have five choices and three European countries have at least two to choose from.
51. DHH Coalition feel that there needs to be more competition as it would make it easier to switch to another VRS provider if dissatisfied with the current VRS provider.
52. DHH Coalition feels that despite a smaller population in Canada, there is no reason to limit to just one VRS provider and that there should be at least two of them.
53. OVRSC feels that having just one VRS provider means that Deaf persons are limited, thus unable to switch to another provider.
54. Leonor Vlug thought that Deaf persons' choices are limited as we have only one VRS company in Canada while hearing people have different choices such as different wireless providers, internet providers, and access to many different things.
55. DWCC would love to have another VRS provider in Canada, but is aware that adequate staffing of interpreters is challenging. They wonder if it is feasible at this point of time. Perhaps this could be revisited in the future when the pool of interpreters has grown.
56. DWCC also is aware of the limited number of interpreter education programs and that impacts the VRS industry as a whole.

Call connection

57. DHH Coalition is irritated that the current standard of a VRS call must be responded to within 2 minutes and felt that this is the equivalent of hearing persons' lengthy dial tone.
58. DHH Coalition stated that someone could be in queue for number 10 in waiting for an interpreter to connect with while hearing persons are immediately connected to the system.

59. DHH Coalition proposes that the standard be reduced to 30 seconds and that the standard be measured on an hourly basis rather than a monthly basis.
60. DWCC applauds DHH Coalition for striving for communication equity, but advises them to take into consideration any external factors that may make the VRS service provisions challenging at times.
61. DWCC is aware that there is a limited number of interpreters in Canada, which is the reason for the length of time before a VRS call is connected, thus this is out of CAV's control due to limited human resources.

Interpreter

General Comments

62. OVRSC feels that the interpreters who scolded or interrogated VRS users acted in violation of their privacy and against the interpreter's Code of Ethics.
63. OVRSC feels that interpreters must not choose power over their code of ethics that is there to protect the Deaf person. They feel that Deaf persons' rights have been taken away when this happens.
64. OVRSC stated that VRS provides access to communication as a human right for Deaf persons and that their rights should never be oppressed. This means making sure that the interpreter and CAV don't have power over the Deaf person in order to make it more equitable.
65. DWCC is in agreement with the OVRSC, and therefore reiterates what it stated in its Intervention how critical it was to set up a separate line for interpreter feedback, separate from the technical customer service feedback to respect the privacy of interpreters.⁵

SRV Canada VRS Announcement

66. OVRSC expressed their disdain that the interpreter announces SRV Canada VRS at the onset of their calls, despite their wish for the interpreter to not do that.
67. OVRSC said that in America, the call is immediately connected directly to the interpreter where the call continues to ring until the Deaf person responds.

⁵ DWCC Intervention - [link](#) paragraph 157, page 40

This means the Deaf person will have the first word and if the Deaf person does not respond, then the interpreter will say the person is unavailable and inquire whether the hearing caller wants to leave a message.

68. OVRSC does not appreciate being told by the interpreter that “It is policy to announce SRV Canada VRS,” and that this action itself takes the Deaf person’s power.
69. OVRSC wants to be empowered to make the decision whether they should announce SRV Canada VRS. Sometimes it is not necessary to do this as the hearing caller may already be familiar with VRS.
70. OVRSC wants the platform to have the option for callers to decide whether to have the SRV Canada VRS announced by the interpreter or to self announce.
71. DWCC agrees with the OVRSC on the **disempowerment** of ASL or LSQ callers over the announcement initiation of the calls.
72. DWCC supports the OVRSC on having the option for callers to decide whether SRV Canada VRS is announced or not.

Connection

73. Darrell Villa is frustrated with the length of time in connecting to an interpreter and that it is essential not to have interruptions during interpretations. He is concerned about missing information due to disrupted conversation flow.
74. CDBC.VRS is frustrated with the time waiting to be connected with an interpreter and the number of transfers, even though the VRS call had just begun.
75. A CDBC.VRS representative mentioned that a VRS call had disconnected from them without capturing pertinent information, so the consumer had to make the same VRS call again.
76. CAD-ASC wants the option to remain connected with the same interpreter should a call accidentally get disconnected as the interpreter is already familiar with the context. Using a different interpreter can interrupt the flow of conversation if you have to educate them or start the conversation again from scratch.
77. DWCC supports that there should be technical means of the interpreter reconnecting with the Deaf caller after being unexpectedly disconnected. This is especially important for the accessibility of the Deaf-Blind ASL or LSQ caller.

Personal Stories

78. Darrell Villa shared his experience of being connected with an interpreter he used to date and had rejected due to a lack of chemistry and that it was an awkward experience.
79. Darrell Villa feels that he should have the ability to choose the interpreter, not VRS and prefers to have the ability to choose for comfort reasons.
80. OVRSC shared stories where users were scolded or interrogated by the interpreter for sharing their VRS account despite that they were mother/son and wife/husband due to CAV's policy of not allowing accounts to be shared with others that are not registered to that account.
81. OVRSC compared these experiences to a hearing person being able to use another person's phone with the account holders' permission and not being penalized for that.
82. DWCC supports the OVRSC with the freedom of using another account, especially as it might not be intentional or an urgent call with no time to login and log out. This is detrimental and impedes the independence of the caller, and is an unnecessary interference in the case of an emergency.
83. DWCC emphasizes that the interpreter must be neutral at all times, and abide by their code of ethics and not "policing" the video relay service calls.

Other Comments

84. Darrell Villa dislikes it when his VRS call is on hold, and the interpreter says "Sorry, I have to take a break," or "It's the end of my shift," where the call gets transferred and then disconnected.
85. CAD-ASC expressed its concern about contracting out to U.S. interpreters as they are likely unfamiliar with Canadian terminology, finances, signs, locations, etc.
86. Leonor Vlug shared that she sometimes has to type things in the chat box due to the interpreter struggling to read her fingerspelling or understanding signs.
87. DWCC believes there needs to be accountability on the interpreter's behalf with the transfers and disconnections in connection to breaks and ends of shifts. Interpreters need to be firm with their boundaries, if they are about to leave on shift, to decide to disconnect based on the preparation the caller

gives the interpreter on initial connection, and immediately transfer to the next interpreter. This reduces the likelihood to have a call somewhat “interrupted,” especially if it is a job interview call. It is unfair to ruin a Deaf caller’s chance for a job opportunity based on cutting off their access to an interpreter.

Features in VRS App

Basic Features

88. DHH Coalition thought that the American VRS system had better and newer features than Canada’s. Some of those features include notifications for incoming calls with a device that vibrates, call forwarding to another device, and having web-based VRS.
89. CDGM said VRS calls cannot be transferred to another screen to optimize using a larger screen.
90. OVRSC thinks that the VRS features currently are simple and basic, just being able to make and receive calls and to leave video messages.
91. Leonor Vlug thought that CAV had not kept up with current technology. It should include an Apple watch, crash detection, and quick emergency dialling.
92. DWCC believes that the features should first be improved for communication equity and subsequently be consistent with video interoperability and accessibility features across different devices.

Chat Box

93. Darrell Villa expressed his frustration with the inability to copy and paste from the chat box important information and that he has to type it out. He wants to be able to easily copy and paste phone numbers, email addresses, etc.
94. The CAD-ASC is frustrated with the lack of ability to copy and paste phone numbers from the chat box.
95. Darrell Villa wants the chat function to be improved. This includes being able to send screenshots and having pertinent information emailed to him.
96. DWCC agrees that the chat box needs to be improved, including the ability to copy and paste, and have the text transcript emailed.

Notifications

97. Darrell Villa stated that VRS users must be “glued to the screen” while on hold in order to not miss the hearing caller.
98. André Thibeault said that the mobile phone does not vibrate when they receive incoming VRS calls.
99. DWCC supports Darrell Villa and André Thibeault that there needs to be visual and haptic notification for incoming calls and that the hearing caller is currently responding.

Time Ticker

100. Darrell Villa wants to have a time ticker to indicate how many minutes are left until the interpreter has their break so he can determine whether there is adequate time to make the VRS call before the interpreter has to leave.
101. DWCC thinks that Darrell’s idea of having a time ticker for the interpreter is good, but may be technically impractical.

Multi Party Screen

102. DHH Coalition indicated that at least one American VRS company has 3 parties seeing each other at the same time: the hearing person, the Deaf person, and the interpreter being able to see each other.
103. CAD-ASC expressed a preference for Zoom and live captioning more than VRS as they cannot see the hearing person with whom they are communicating. A Deaf person needs to be able to see facial expressions and to capture more visual cues from the other party.
104. DWCC wants three-way calling to be revisited because the cellular network is currently 5G+ so more reliable now and 89% users are using wifi at home. In our Intervention we mention the possibilities that are available and suggest that they are made available in Canada.⁶

Work VRS Phone Number

105. DHH Coalition shared that businesses or organization cannot have a VRS number as it is not permitted.

⁶ DWCC Intervention - [link](#) paragraph 92, page 29

106. CAD-ASC expressed its desire to have its own VRS work phone number so that people can call CAD-ASC via VRS and not have to rely on a hearing receptionist.
107. CAD-ASC has to rely on a personal VRS phone number. The problem with that is that the phone number is the individual's and takes the VRS number with them and the business operations are affected as it does not belong to CAD-ASC.
108. CAD-ASC shared that Deaf businesses cannot have their own separate number and feels that it is not functionally equivalent to hearing persons.
109. CAD-ASC said that there needs to be a work phone number that is separate from the personal phone number.
110. DWCC is aware that the Greater Vancouver Association of the Deaf (GVAD) in British Columbia has a VRS work phone number and that there is a page in the SRV Canada VRS to register for a work VRS phone number.⁷
111. DWCC wonders perhaps there is inadequate awareness and promotion by CAV about registering for a work VRS phone number?

Point-to-Point Video Calls

112. Darrell Villa shared his frustration with not being able to make video calls from the VRS platform to another platform or outside of Canada. He feels that he is being told who he can call and who he cannot call and that this is UNACCEPTABLE.
113. DHH Coalition said that hearing persons can make point-to-point video calls to anyone anywhere with as many parties while Deaf persons do not have the same privilege.
114. DHH Coalition stated that point-to-point video calls are limited to two VRS users who must be Deaf and use it domestically. International point-to-point video calls are not possible.
115. DHH Coalition mentioned that suppose hearing VRS users were allowed, then they won't need to use the interpreters via VRS and feels that this will be a cheaper way to operate VRS and a better use of interpreters' time.

⁷ [Work VRS phone number](#)

116. CAD-ASC found it frustrating that they cannot make point-to-point video calls from the VRS app and are unable to make video calls outside of Canada. They found it ironic that they cannot video call a Deaf person in the U.S., but can video call a hearing person via VRS.
117. DWCC strongly recommends that CAV work with its U.S. counterparts on getting cross-border video call interoperability to ensure communication equity and Deaf person's choice and independence. This statement was in its Intervention document in this proceeding.⁸

Outages

118. Darrell Villa said the outage on November 29, 2022 has had a huge negative impact on the Deaf Community.
119. DHH Coalition feels that VRS is not really 24/7 due to the outages and shared that in October and November 2022, there were three outages that were more than 30 minutes for maintenance.
120. DHH Coalition thought that hearing persons have 24/7 reliability except for the Rogers outage on July 8, 2022 where everyone was impacted.
121. OVRSC said that whenever CAV updates its VI platform it often causes outages. They found that there was a lack of testing ahead of time and done during real time and real environment at the expense of Deaf persons' calls.
122. According to SRV Canada VRS' website, there were a total of 11 outages during the third quarter of the 2023 year.⁹
123. DWCC appreciates that CAV has posted the outage list for the third quarter of 2023, but wonders the type of these outages and wishes there were better notifications of them. There needs to be more of these notifications across multiple sources and platforms, and in real time.

Education and Public Outreach

124. CDGM thought that there needs to be more education about VRS as there are struggles with making VRS calls to banks, CRA, etc., as it involves sensitive information. They frequently have to argue with them and waste about 20 minutes to use VRS.

⁸ DWCC Intervention - [link](#) paragraph 187, page 45

⁹ [Outage List for Current Quarter](#)

125. CDGM said more commercials about VRS are needed. An example of such commercials is the one that spotlighted Dr. Jessica Dunkley.¹⁰
126. CAD-ASC thought that public education and knowledge about VRS is lacking and that many small and large businesses don't realize that VRS is available.
127. CAD-ASC representatives shared their experience where they spent 8 hours obtaining approval to use VRS after their bank refused to accept the VRS call. It was a call to resolve a simple banking issue and that situation is ongoing as Deaf consumers are still required to talk with the manager for approval to use VRS.
128. CAD-ASC said making VRS calls to banks is the most frustrating process and their biggest challenge for VRS users and thought this is a minor problem but has a huge negative impact on VRS users.
129. CAD-ASC said that Deaf people must not be forced to constantly educate others about VRS.
130. OVRSC found that the financial industry has a huge issue with VRS.
131. DWCC believes strongly in public education and awareness and that the shift needs to be made to the wider mainstream, to television commercials and CAV's social media posts must be made public so posts can be cross-shared much more widely.
132. Additionally, DWCC believes the focus has been on community education but now it is time to shift to commercial education and awareness and focus on the CRA, banks, and federal government agencies.

Community Outreach

133. Leonor Vlug mentioned how, at the beginning of the rollout of SRV Canada VRS, there was community support and outreach. The personal contact was terrific, however a key barrier was the rule that outreach workers could not go into people's homes. Often, the outreach activity was held in a community hall where it was dependent on customers using their wireless data or the location's wifi if possible. So the practical advice shared was not desktop-based - e.g. if the customer had a desktop-direct connected to their internet, the experience would NOT be the same.

¹⁰ Commercial about VRS - [SRV Canada VRS – Don't Hang Up!](#)

134. Leonor Vlug feels that the key to excellent community outreach is in-person information. This form of contact is more accessible and, thus, is essential. She also stated that there is a CAV outreach worker in Alberta and none in British Columbia, even though the DDBHH population is larger in BC.
135. Leonor Vlug said that if there is a technical issue with customers' desktop-based VRS, CAV could send an outreach worker to fix the problem in the home. It would be more effective to have a "Travelling Geek Squad," which would be a more direct way to help people solve their issues.
136. DWCC understands that the COVID pandemic has had a huge impact on how people interact with each other and the CAV appears to have not returned to pre-pandemic in-person socialization levels. DWCC supports a "Travelling Geek Squad" to assist seniors, Deaf-Blind and Indigenous with technical configurations of the VRS application.
137. As in its Intervention, the DWCC recommends the CAV hire a person from British Columbia where there are large groups of senior citizens that require personal technical assistance.

Equipment Supports

138. Darrell Villa informed the CRTC that in the U.S. free iPad, visual notifications, etc. are provided and inquires why Deaf persons are expected to pay extra for accessibility when hearing people are readily given that.
139. Darrell Villa thinks that the CRTC should provide free iPad, laptops, visual notifications, etc. to Deaf persons and that's the end of discussion.
140. CDBC.VRS said that the iPhone screen is too tiny for VRS calls, and many Deaf-Blind users prefer the iPad as it has a larger screen and is easier to see.
141. CDBC.VRS says that Deaf-Blind users need to have a choice for their visual comfort and data can be limited due to their budget needs.
142. CDBC.VRS mentioned that they tend to use VRS mainly at home because using data for VRS calls on an iPhone tends to run out of data limits quickly.
143. CDGM shared that many DDBHH persons do not have another device to use to resolve technical problems on their primary device so this means that they are unable to use SRV Canada VRS to make calls.
144. CDGM shared that many Deaf persons have low income, thus are unable to afford purchasing devices that would make it possible to make VRS calls. They often have to resort to borrowing other persons' devices or incompatible devices to use VRS.

145. CDGM thinks that the government should set up a funding program that provides free devices to low income Deaf persons.
146. Companies such as Rogers and Telus offer low cost equipment support programs to the Indigenous, and with this, the DWCC questions why can't this be made available to persons with disabilities.
147. Based on the comments from Darrell Villa, CDGM and the CDBC.VRS, DWCC encourages the CRTC to seriously consider working with the Industry, Science, Economic Development (ISED) department to develop a national equipment subsidy program to ensure low income persons with disabilities including Deaf and Deaf-Blind VRS users can get the equipment they require for accommodations, such as iPads for larger reading accessibility features. In fact, this whole concept has been repeatedly recommended by DWCC and other groups since 2012. It is time that CRTC and ISED listen and implement the motions to make this possible.

Users' experiences with using 9050

General Comments

148. The CAD-ASC representative said that 9050 is the most Deaf-friendly customer experience as users can communicate directly in sign language. To date, it is the only customer service that uses sign language and the representative loves it.
149. CAD-ASC thinks that support wait times are longer for hearing customers, while Deaf callers connecting with 9050 have a short and sweet wait. They believe the service itself is great, despite the fact that the staff can't solve all of the technical problems.
150. Leonor Vlug disclosed that her experience with 9050 could have been better. She felt that her issues remained unresolved, her boundary was disrespected, she was not given the attention required. Leonor believes that this happened because the technical support person wasn't fluent in her primary language, ASL.
151. DWCC thinks that 9050 is a nice help desk to have for VRS users to turn to for assistance, however there are some improvements that DWCC supports as suggested by the virtual participants.

Choice of language use

152. The OVRSC representative mentioned that they had received a reply from CAV in English but were puzzled by the choice of response language as the person had called in their primary language, ASL. They had expected a response in ASL, especially that English isn't beneficial for VRS users who are not fluent in that language.
153. OVRSC gave this feedback to CAV but was given the attitude of "shrugging shoulders" and told, "This is our procedure."
154. DWCC agrees with OVRSC that CAV should be practicing language reciprocity where the VRS user responds back in the language that they used when they first contacted 9050. This practice would show respect for the VRS users' chosen language.

Community Engagement

155. Darrell Villa felt that after SRV Canada VRS was established, feedback was not considered and was "blocked out." He said that to have the VRS service for five years and then "blocking his feedback" is irritating.
156. Darrell Villa recommended that there be annual input from the Deaf community, of all opinions and experiences. There needs to be continual feedback from the consumers and that feedback is implemented accordingly.
157. DWCC supports the idea of allowing annual input from the Deaf community on how the VRS experience can be improved and that CAV should not wait until the CRTC's 3 or 5 year VRS Review to incorporate suggestions and improvements.
158. OVRSC is questioning whether CAV is fully aware of the community's feedback. OVRSC thinks that the current structure of CAV's customer service (9050) is where they "gatekeep information."
159. DWCC reminds all parties that the 9050 has to be accountable to the CAV and the CAV is accountable to the CRTC. It views that if issues aren't being resolved at 9050, the fallback is on the CAV, and it is the CAV that needs to be more transparent with what it is doing with the information received from the 9050 technical support team.

Communication from CAV

160. Darrell Villa feels that there needs to be more transparency and improvement made by CAV at all stages of reviewing VRS.
161. CAD-ASC representative mentioned how a complaint was reported, but they have yet to receive an email informing them of the status. They did not know whether the complaint indeed had been filed and didn't know what its status was. Has it been fixed or solved?
162. An OVRSC representative expressed that CAV is not proactive with updating information or status of an issue but wonders if CAV may listen and fix it, but it's "behind the curtain" and that we don't see it.
163. DWCC agrees with Darrell Villa, CAD-ASC, and OVRSC that there is a lack of status report and that CAV needs to be more proactive in communication with the complainants.

VRS Support Persons

164. CAD-ASC mentioned that they had a technical issue with having duplicate screen displays of the interpreter and told 9050 of this issue. They were informed to try again, and they did, but the problem persisted and there didn't seem to be a direct solution.
165. OVRSC said that the technical support person is not fluent in ASL but in LSQ. It's likely that ASL is their 3rd or 4th language and they are uncertain about what was written in the ticket and whether it was what they said.
166. OVRSC suggested that technical support be separate from customer support while Leonor Vlug said that the VRS needs to have two separate options for Support - One related to technical aspects and another related to interpreting and communication, where feedback and compliments can be received and the other for issues related to technical problems on the platform - transmission and or functionality.
167. DWCC agrees with the OVRSC and Leonor Vlug to separate the technical support from customer and interpreter feedback mechanisms.

Features Suggestions

168. Darrell Villa expressed his concern to 9050 about having to stay "glued to the screen" while on hold during VRS calls not to miss the hearing person responding and suggested to them to add a visual notification, but felt his suggestion was never taken into consideration.

169. Darrell Villa wants the ability to send screenshots to the interpreter should the need arise. He did inform 9050 of his suggestion, but all he got was a “head nod” – that it “will be informed” without any improvement.
170. OVRSC shared that they made a lot of feature suggestions; some are personal that benefit everyone, while others were for business owners.
171. DWCC supports Darrell Villa and OVRSC that features suggestions should be immediately implemented should it be technically feasible and that CAV should inform the public of current features they’re working on or soon to be released. This would assure VRS users that their suggestions are being heard and in the process of being created as well as their estimated timelines.
172. DWCC thinks that CAV should model after Apple on how they release the newest features annually to add buzz over the newest features.

Complaints Directly to CRTC and CCTS

173. Darrell Villa wants to be able to complain directly to CRTC, but its website is not Deaf friendly and that all the people at CRTC are hearing persons, which makes him feel disconnected and disengaged. He used the metaphor of white persons listening to black persons.
174. Darrell Villa also wants a Deaf person to work at CRTC that listens to complaints and improvements for VRS and CAV.
175. DHH Coalition alleged that CAV directly handles complaints about CAV and feels that they are misrepresented and that the CRTC will not know what has happened to the complaints afterwards.
176. DHH Coalition wants Deaf people to be allowed to file complaints with CCTS and CRTC about the CAV before it escalates, as it is best that the complaints about CAV be handled independently.
177. DWCC thinks that there should be independent complaints directly to CRTC and CCTS in direct video communication with ASL or LSQ staff representatives responding.
178. DWCC wholeheartedly supports the concept that a Deaf person be placed in the CRTC to manage accessibility for ASL and LSQ users. FCC has been a great model of this.
179. DWCC did mention that in their meeting with Ian Scott, Chairperson and CEO of CRTC, in May 2022 that there were 16 signing Deaf persons as well as staff ASL-English interpreters working for the FCC while DWCC believes that there is currently just one at CRTC. DWCC questions if the sole deaf

employee is culturally Deaf and uses ASL and LSQ as this is the primary need at the CRTC.

Communication Equity

180. DHH Coalition is frustrated that 9050 Customer Service desks are not open 24/7 as they are closed during Saturdays, Sundays, holidays, and internal staff meetings, which is a problem for the Deaf community.
181. DHH Coalition wants to see 9050 have functional equivalency where Rogers, Telus, etc., have 24/7 technical and customer support.
182. DWCC supports having extended hours for customer services, simply because if hearing people can have these hours, why can't ASL and LSQ VRS users have the same services?
183. DWCC recommends the telecommunication service providers also have direct video communication customer services in ASL and LSQ.

Interpreter

184. Darrell Villa recommended that there be five interpreter options for him to choose from so that he could choose his favourite one and was told this was disallowed to avoid favouritism.
185. DWCC encourages CAV to provide this option as this to empower Deaf VRS users. Disempowerment should not be taking place. Deaf persons should have the power to choose from interpreters, similar to community-based assignments.
186. Darrell Villa complained to 9050 about the interpreter typing while on the job to inform the manager that they needed a break. He disliked the interruption of conversation flow and felt it was not communication equity from Deaf to hearing persons.
187. DWCC strongly supports a policy guideline for job interviews, as it is hard enough for Deaf community members to find work, the interpreters should not be taking breaks in the middle of critical sessions.
188. Darrell Villa would like to know whether the hearing caller is a man or a woman rather than the VRS just "jump into interpreting." He has informed 9050 many times and was told, "It's a good idea," but feels his suggestions are never implemented afterwards.
189. Darrell Villa experienced a connection with an interpreter taking too long and expressed his grievance to 9050, but all he received was a "head nod" and his complaint "will be informed."

190. DWCC reiterates that there needs to be a separate feedback mechanism for interpreter complaints as it is clear that the 9050 focuses on technical feedback. The technical staff are not qualified in interpreter code of conduct and code of ethics to field complaints and comments about interpreters. Out of respect to the interpreters and the consumers, a separate line needs to be established, with one of the CAV staff supervising.

Users' experiences with using VRS 9-1-1

General Comments

191. Most individuals and groups have indicated they have experience using VRS 9-1-1 at least once, and their experiences vary.

192. OVRSC said that the first year of VRS had very limited hours and they were concerned about emergencies and requiring to make VRS 9-1-1 calls should the need arise. Eventually VRS became 24/7 and they were relieved that they could use VRS at any time.

193. Darrell Villa used it once, and it connected fast, but he inquired why 9-1-1 is the priority. He believes that connection speed should not matter based on the purpose of using VRS and that all VRS calls should be treated the same.

194. DWCC stated that due to the emergent nature of 9-1-1 calls, it is appropriate and expected that VRS 9-1-1 calls to be prioritized before all other VRS calls. DWCC understands this is already taking place with the prioritization of 9-1-1 calls.

195. DWCC understands that there are challenges in having adequate ASL and LSQ interpreters on VRS due to the shortage of such interpreters in Canada and is not surprised that non-9-1-1 calls can take time to connect with an interpreter. DWCC reminds parties that the calls have to be connected through Northern 9-1-1.

Communication Equity

196. DHH Coalition stated that the National Emergency Number Association (NENA) has a standard that 90% of 9-1-1 calls must be answered within 20 seconds. It should be the same for VRS 9-1-1 calls to ensure functional equivalency.

197. DWCC fully supports that Deaf callers have communication equity to their hearing counterparts, but understands and takes into consideration the additional connections required before connecting to a local 9-1-1 dispatcher.
198. DWCC appreciates DHH Coalition's position that VRS 9-1-1 calls should meet the NENA standard. However, DWCC suggests that 30 to 40 seconds would be more attainable considering the local connection considerations.
199. To attain functional equivalency, CAD-ASC wants a feature where the phone immediately connects to VRS 9-1-1, similar to what hearing counterparts have where they click a button that directly connects to 9-1-1.
200. To clarify on the comment the CAD-ASC made above, a DWCC representative had a recent car accident experience where they had to call VRS 9-1-1. The representative found calling VRS 9-1-1 was not as straightforward as expected. First, they had to enter their iPhone PIN, then look for the SRV Canada VRS app, click on the app to enter, and at last, dialled 9-1-1. They wonder why there is no option to go directly to VRS 9-1-1 from the device's open screen.
201. DWCC wholeheartedly supports the idea of having a more direct way of connecting directly to VRS 9-1-1 due to its emergent nature. VRS users should not be burdened with additional steps compared to their hearing counterparts as that would not be communication equity.
202. CAD-ASC also mentioned that the crash detection feature on cell phones and smart watches will automatically call 9-1-1 after the timer runs out. Still, it is voice-based and inaccessible to Deaf users, thus is not functionally equivalent.
203. DWCC thinks that CAV should look into how to make the crash detection feature more Deaf friendly for VRS users to ensure communication equity.
204. Leonor Vlug said that VRS 9-1-1 needs to include GPS to show where the individual is and not depend on the address in the user's account. VRS 9-1-1 needs to be location-based rather than reflect where the user lives.
205. DWCC strongly believes it is time to have location-based GPS attached to the VRS for immediate emergency response. It is time, devices currently have this capability. CAV needs to make this one of their top priorities.

Connection to VRS 9-1-1

Positive Experiences

206. Leonor Vlug shared her positive experience with VRS 9-1-1, where she felt she had connected with the right interpreter. The interpreter had informed her it would soon be her break, but that they would remain on the call until everything had worked out and an ambulance had arrived. She was cheered up by the interpreter when she was told, "I hope everything will be okay." Ms. Vlug valued that human connection.
207. The CDGM representative had a positive experience with VRS 9-1-1, where the interpreter stayed on the call with her until the firemen and ambulance arrived. This person liked that aspect of remaining connected until 9-1-1 was no longer needed.
208. DWCC is pleased to know that Leonor Vlug and CDGM had an interpreter who stayed connected with them until VRS 9-1-1 was no longer needed. It is essential to maintain the human connection to ensure a positive and calm experience during a crisis.

Negative Experiences

209. OVRSC shared their negative experience with VRS 9-1-1, where they could not connect with the interpreter. However, the app was glitchy, and they became frustrated because it was a medical emergency during COVID-19. They then had to text an ASL interpreter from work to FaceTime to call 9-1-1.
210. DWCC finds it incomprehensible and unacceptable that the VRS 9-1-1 call failed to go through, and it was fortunate the OVRSC person could find an alternate way to call 9-1-1. Many DDBHH persons may not be as lucky as them, and the emergency could have escalated into a further crisis.
211. CDGM shared that they knew of a Deaf person who had an emergency related to her daughter and tried to call VRS 9-1-1 around 1:00 AM or 2:00 AM, but the VRS 9-1-1 call did not go through. The Deaf person was forced to ask their daughter to make the 9-1-1 call.
212. DWCC finds this situation unacceptable as it took away the Deaf person's ability to make the 9-1-1 call themselves and this hinders their right to have communication accessibility during a 911 call.

Accessibility for Deaf-Blind Persons

General Comments

213. CDBC.VRS stated that hearing persons with decreased vision are not similar to Deaf-Blind and that the needs of Deaf-Blind persons differ from those of sighted Deaf and hard of hearing persons.
214. CDBC.VRS thinks that CAV is not aware of Deaf-Blind culture and that interpreters need to understand what accommodates Deaf-Blind individuals and be sensitive to their communication needs.
215. Josiane Marcoux prefers to use her first language, LSQ. She feels she has more power through that language.
216. Josiane Marcoux said that smooth communication is essential, and any service must be customized to her needs as a Deaf-Blind person to minimize stress and frustration.
217. Leonor Vlug stated that the VRS interpreters are “very, very, very white” and that they do not understand the needs of Deaf-Blind VRS users.

Barriers to SRV Canada VRS

218. CDBC.VRS members shared that the Deaf-Blind community feels ignored by CAV and the CRTC despite that they are part of the signing community.
219. CDBC.VRS stated that before VRS, they would have to rely on a TTY and found it challenging to type in English. VRS enables Deaf-Blind individuals to have a much clearer form of communication.
220. CDBC.VRS said many Deaf persons, including immigrants, struggle with English, finding it challenging to understand. For them, sign language is more accessible.
221. The CDGM representative expressed concern that Deaf-Blind and low-vision persons often cannot access VRS. Therefore, their accessibility needs to be improved.
222. Josiane Marcoux says she faces barriers daily when there are solutions already available. She feels behind and unable to catch up.
223. Josiane Macroux stated that she is experiencing great frustrations and said that her communication needs aren't being considered.
224. Josiane Macroux said there needs to be greater understanding and compassion towards Deaf-Blind persons' needs and that CAV must provide

customized communication access accordingly when they need to access VRS service.

225. DWCC is concerned that there are barriers for Deaf-Blind persons accessing VRS and that their accessibility to it must be significantly improved.

Equality for Deaf-Blind VRS users

226. CDBC.VRS declared that Deaf-Blind persons have a right to access VRS and that there needs to be more equitable access for them. This includes tactile signing and braille keyboarding equipment.
227. CDBC.VRS encourages CAV to ask the Deaf-Blind community on what they need for a fully accessible VRS experience and that Deaf-Blind persons deserve equal access to VRS.
228. André Thibeault stated that all Canadians must have full equality and access to communication. He feels that currently, Deaf-Blind persons have sub-par access to communication.
229. DWCC fully supports that Deaf-Blind persons have full equality and access to communication, including VRS. This begins by including them in the decision making process where they have a say on what kind of access they need and how their access to VRS can be optimized.

Inclusion of Deaf-Blind Persons

230. CDBC.VRS says that the Deaf-Blind community wants to be included in the CRTC proceedings and within CAV for lived experiences as they are the best experts on Deaf-Blind issues.
231. CDBC.VRS encourages CAV to hire someone who is experienced with the needs of Deaf-Blind persons.
232. CDBC.VRS wants Deaf-Blind persons to be empowered to make decisions. This means including Deaf-Blind persons in the decision-making process to ensure satisfaction with their accessibility needs rather than CRTC and CAV making all of the decisions that may not be in their best interest.
233. André Thibeault strongly feels that the 2014 policy should respect him as a Deaf-Blind person and that CAV should look at a company in the U.S. called GlobalVRS as a model for Deaf-Blind services and accessibility.
234. Leenor Vlug said that there is no Deaf-Blind representative on the CAV board and that there needs to be more diverse and varied representation.

235. DWCC supports the inclusion of Deaf-Blind Persons in any decision making processes that impacts their accessibility to VRS and having a Deaf-Blind representative on the CAV board.

Accessibility Needs

Customization of Font Size and Colours

236. CDBC.VRS stated that the font size in the VRS app is too small and difficult to read.
237. André observed that the text for choosing the language option for ASL or LSQ is very small. In addition, he said it is not possible to customize font size and colours to accommodate individual preferences.
238. CDBC.VRS and André Thibeault want Deaf-Blind persons to choose their preferred coloured background in the chat box to match their vision access requirements.
239. DWCC finds it baffling that customization of font size and colours is not possible given that it is the expected technological standard. Televisions, streaming platforms, and tablets have font size and colours that can be easily customized. It's a matter of modelling after them.

Background Colour

240. The CDBC.VRS members stated they need the interpreter to have a background colour that is suited to their visual needs, which differs from the Deaf community's.
241. André Thibeault also stated that the interpreter must set the appropriate background colour for Deaf-Blind persons to see clearly. The U.S. VRS industry does this well, and André feels that Canada VRS must improve the use of background colour that is accessible to Deaf-Blind persons.
242. DWCC agrees with CDBC.VRS and André Thibeault that there be an expected standard of the colour of background that interpreters use to meet the visual accessibility needs of Deaf-Blind persons.

Clothing and Others

243. CDBC.VRS also mentioned that they need the interpreter to wear a black shirt except for black interpreters, whose shirt colour must contrast with their skin colour for visual comfort.
244. André Thibeault said that the interpreters should wear long-sleeved dark-coloured shirts as it is easier to see the signs and to not wear turtlenecks.

245. André Thibeault stated that there should be standards to ensure that the interpreters dress appropriately, with minimal exposed skin, and remove jewellery to reduce distractions.
246. CDBC.VRS dislikes it when there is “visual noise” in the background when viewing the interpreter during VRS calls. It can be distracting when light reflects off the table or chair, or other types of movement happen.
247. DWCC supports CDBC.VRS that CAV creates a standard that interpreters must adhere to that minimizes visual distractions so that Deaf-Blind persons’ VRS calls are visually comfortable and with ease.

Interpreters

Pacing of Signing

248. CDBC.VRS said that when the interpreter signs too fast, they cannot understand and need the interpreter to sign slowly or write down key points on a piece of paper in large font with a black felt pen. These actions lead to less frustration and better understanding.
249. André Thibeault mentioned that Deaf-Blind persons want the interpreter to pace their signing so their signs can be seen clearly.
250. DWCC supports CDBC.VRS and André Thibeault that interpreters need to be extra sensitive with their signing speed when it is aware that a Deaf-Blind ASL or LSQ user is calling.

Direct Communication

251. CDBC.VRS said that Deaf-blind users need to know what is going on to keep the connection going, as “holding in the air” is confusing and frustrating.
252. CDBC.VRS expressed their desire for the interpreter to mention what is happening while the VRS call is on hold. They dislike it when the interpreter’s eyes are not focused on the screen, creating a disconnect.
253. CDBC.VRS wants the interpreter to communicate that their shift is ending soon so they can determine whether to proceed with the call or request another interpreter.
254. DWCC agrees with CDBC.VRS that there needs to be more communication by the interpreter of what is going on in the VRS call to minimise confusion and frustration.

Other Comments

255. CDBC.VRS wants VRS to reduce the number of transfers as Deaf-Blind persons quickly become confused and frustrated explaining information to the interpreter(s) repeatedly. This is very stressful for Deaf-Blind VRS users.
256. CDBC.VRS finds VRS calls challenging when the interpreter has a blank expression. They want interpreters to have explicit facial expressions and provide cues indicating what is happening.
257. DWCC supports the CDBC.VRS to have the least amount of technical and human barriers for Deaf-Blind ASL and LSQ VRS users. This can be done by greater facial expressions and no transfers or interruptions with Deaf-Blind callers.

Communication Options

General Comments

258. André Thibeault wants to be able to use either keyboard to braille or tactile sign which he says is an accessible accommodation.
259. André Thibeault felt that CAV was refusing to accommodate his accessibility needs as a Deaf-Blind person.
260. Josiane Marcoux says each Deaf, Blind, or Deaf-Blind person has their own communication needs, and Josiane's preference is keyboard to Braille.
261. DWCC supports that Deaf-Blind accessibility must be provided by the CAV with keyboard to braille and tactile to sign options for communication.

Tactile Signing

262. André Thibeault shared that he is Deaf-Blind and uses tactile signs. He said that he once tried to use VRS to order pizza, but it was impossible and he was sad about it.
263. Leonor Vlug shared that in three American states, Deaf-Blind users who may be unable to see a screen can use a communication facilitator for VRS calls. At an agreed location, the sighted Deaf person tactile signs to the Deaf-Blind person what the VRS interpreter signs, then the Deaf-Blind person signs back to the interpreter.
264. CDGM suggested perhaps a call centre of some sort for Deaf-Blind persons to go to to access tactile interpreting.

265. Josiane Marcoux feels that she should not be limited to using VRS during the hours that she has a tactile signing intervenor. It's frustrating for her to wait and wait for that service to be available.
266. DWCC supports the concept of Communication Facilitators for Deaf-Blind to go to or for them to come to the Deaf-Blind VRS users for tactile ASL or LSQ accessibility.

Keyboard to Braille

267. Josiane Marcoux is a Deaf-Blind Francophone and requires a keyboard to braille to receive information and use VRS to express herself.
268. André Thibeault said he requested CAV for the keyboard to braille several times, but was always turned down.
269. André Thibeault informed CAV that he needed the interpreter to type into Braille and was told it was impossible due to the communication standards for VRS that was set up in 2014 - no.187. He was told that standard was only for those who had difficulties with hearing or speaking and used sign language, not for Deaf-Blind persons.
270. DWCC supports that any kind of accomodation the Deaf-Blind VRS user requires to access VRS should be allowed, including another person typing for them, or tactile communications.

Independence

271. Josiane Marcoux wants to be able to make calls herself and not have to rely on tactile signs only as it is stressful for her.
272. Josiane Marcoux stated that she does not want to rely on a communication facilitator and would rather be independent. This means being able to have access to VRS via keyboard to braille.
273. Josiane Marcoux stated that many Deaf-Blind persons require braille as it is the easiest and smoothest way to communicate.
274. Josiane Marcoux wants the keyboard to braille technology to be given out to Deaf-Blind persons so they can access VRS.
275. André Thibeault said that Deaf-Blind persons have the right to be independent and become fully independent in making VRS calls.
276. DWCC wholeheartedly supports Josiane Marcoux and André Thibeault to have their independence to make VRS calls at any time they wish. This also includes other Deaf-Blind persons who want to access VRS.

Users' Experiences with 9050

277. CDBC.VRS members were unaware of the 9050 Customer Service number until they realized the 9050 service for end stated that it was the same with other Deaf-Blind users. They felt that Deaf-Blind VRS users were behind with updates and news.
278. CDBC.VRS indicated that they are uncertain of where and how to get information as it is not clear where to click to call 9050 and that education on making 9050 calls is needed.
279. Leonor Vlug indicated that the SRV Canada VRS YouTube channel and its website has a lot of information, but is not easily accessible for Deaf-Blind persons. She said that such information needs to be sent directly to them.
280. The DWCC and the CDBC.VRS in an earlier document mention that YouTube needs to be better organized into playlist categories for it to be easy to find specific videos.
281. Josiane Marcoux said that customized communication is lacking from CAV and that there needs to be more communication to give information directly to Deaf-Blind VRS users.
282. DWCC supports CDBC.VRS, Leonor Vlug, Josiane Marcoux that there needs to be more direct communication with Deaf-Blind VRS users and to ensure that they are receiving information on the same par as sighted DDBHH.

Users' Experiences with VRS 9-1-1

283. A CDBC.VRS member said they were 4th or 5th in the queue to have an interpreter as their initial interpreter was from Ontario, and they needed to wait for one from British Columbia.
284. CDBC.VRS shared that their experiences with VRS 9-1-1 were terrible and that VRS 9-1-1 is challenging for Deaf-Blind persons to access.
285. While waiting to be connected with VRS 9-1-1, CDBC.VRS was in so much pain and had heavy, cloudy eyes and tried her best to see the interpreter when they finally connected with one.
286. Another CDBC.VRS member had a similar experience where she was bleeding on the head and had difficulties seeing through the bleeding. She also said the iPhone screen was too small to see the interpreter clearly.
287. CDBC.VRS inquires how Deaf-Blind persons can call VRS 9-1-1 if their eyes are tired and cannot see clearly. This is a significant problem for Deaf-Blind persons in accessing VRS 9-1-1, especially on their mobile phone.

288. CDBC.VRS suggested that the use of GPS be improved to get emergency assistance over to Deaf-Blind persons more quickly.
289. Josiane Marcoux and André Thibeault have never used VRS 9-1-1 as they felt it was impossible to use.
290. André Thibeault questioned how she can call 9-1-1 if she fell and got herself hurt. He cannot use the current technology and feels entirely blocked from accessing emergency services.
291. DWCC is concerned with the limited or lack of access that Deaf-Blind persons have in receiving services from 9-1-1 and wonders perhaps there be a specialized feature that a Deaf-Blind person can use to reduce the worries, stress, and frustration of receiving emergency services while using VRS?

Closing comments

292. Josiane Macroux pleaded with the CRTC to please improve the system for Deaf-Blind persons. She emphasized that she can make calls, but the current VRS technology is presenting barriers and, thus, is inaccessible.
293. André Thibeault hopes that the CRTC “wake up” as this issue is not just his, but many Deaf-Blind persons across Canada.
294. DWCC supports Josiane Macroux and André Thibeault that the VRS system must be improved to be inclusive of Deaf-Blind persons.
295. DWCC says the renewed VRS Policy as a result of this proceeding should include Deaf-Blind as they were not included in the first one. The CAV must never exclude the Deaf-Blind again.

Conclusion

296. Communication equity must be at the forefront at CAV and the CRTC for DDBHH persons. This means ensuring that VRS users have continuous and equal access to VRS at all times that is comparable to their hearing counterparts.
297. The passing of the Accessible Canada Act in 2019 includes recognition of ASL and LSQ as the primary languages of Deaf persons in Canada. Taking this into consideration, this also includes Deaf-Blind persons, thus this means CAV must enhance VRS accessibility for Deaf-Blind persons.
298. The first step in enhancing VRS accessibility for Deaf-Blind persons is to ensure that they are included in decision making processes related to SRV Canada VRS.

299. Funding needs to be made for a “National Deaf-Blind Accessible Equipment Program” to allow Deaf-Blind to obtain devices to keep up with information and communication as enshrined in the Accessible Canada Act.
300. The platform needs to be either upgraded or switched to a more modern and accessible one inclusive of Deaf-Blind and those with low vision. Currently the background colour and font colours of black background with yellow is not available as an option, and this would be the first immediate step to make the chat box colours an option. This accessibility needs not to be limited to a smartphone but extend across multiple devices and operating systems.
301. Resources and staffing need to be put into place for Communication Facilitators and one-to-one technical support workers to work with indigenous, Deaf-Blind or technically struggling individuals.
302. CAV needs to increase its engagement with the community to accumulate suggestions and feedback from VRS users to enhance their VRS accessibility and experiences. SRV Canada VRS must not remain stagnant and continually strive to meet modern and evolving technological specs to ensure communication equity for DDBHH persons.
303. CAV needs to publicize outages as soon as possible, and be more transparent with its ASL and LSQ VRS users, including the type of outages.
304. CAV must establish a more comfortable means of reporting interpreting problems and challenges.
305. CRTC must ensure it expands its accessibility efforts by hiring ASL and LSQ direct communication personnel to its front-line Customer Services.
306. The Commission for Telecom and Television Complaints (CCTS) or the CRTC need to enable accessible direct communication channels for a neutral external mechanism for elevated complaints. The days of CAV’s laissez-faire approach and sweeping detrimental or complex complaints under the couch are over.
307. CAV’s ASL and LSQ VRS users accessibility, user experience, and ease of use of the platform and applications should be paramount, it is 2023.