DEAF WIRELESS CANADA COMMITTEE

COMITÉ POUR LES SERVICES SANS FIL DES SOURDS DU CANADA

March 12, 2025

Mr. Marc Morin
Secretary-General
Canadian Radio-telecommunications and Telecommunications Commission (CRTC)
sec-gen@crtc.gc.ca

VIA EMAIL DISTRIBUTION and GC KEY

Re: TNC CRTC 2024-295-2 - Call for comments – Making it easier to choose a wireless phone or Internet service – Enhancing self-service mechanisms – Intervention

1. The Deaf Wireless Canada Consultative Committee - Comité pour les Services Sans fil des Sourds du Canada (DWCC - CSSSC or "DWCC"), hereby submits its intervention.

First Intervention Response

2. On February 14, 2025, the DWCC submitted a detailed survey analysis report for TNC 2024-294-3. This report aims to provide valuable insights into the needs and preferences of DDBHH Canadians regarding notifications from wireless and service providers. The analysis supplements the ongoing intervention process by offering data-driven recommendations and highlighting the specific requirements of DDBHH individuals. Through this survey, the DWCC seeks to ensure that the CRTC understands and addresses the unique needs of the DDBHH community, fostering better communication and equitable access to essential telecommunications services. Stakeholders will notice that we have submitted our survey in a slightly different format, in an easier to read and understand format with a more visually appealing slide deck.

3. It is important to note that in the survey, respondents were allowed to select multiple answers for several questions. As a result, the total number of responses for certain questions may exceed the actual number of respondents. For example, one respondent could choose more than one option when answering questions about preferences or needs, which leads to variations in the number of responses for specific categories. This approach ensures that all relevant data is captured, providing a comprehensive understanding of the diverse needs and preferences of

DDBHH Canadians. For this intervention, percentages were calculated based on the number of respondents rather than the total number of responses.

Q1. What features or functions should the Commission mandate as part of any required self-service mechanism, and what information about using them do Canadians need? Explain the specific needs being addressed.

4. DWCC emphasizes the importance of incorporating key self-service features that specifically address the needs of DDBHH consumers. These features are essential in ensuring that individuals with diverse communication requirements can effectively manage their services independently. By including these critical elements, telecom providers can help bridge the accessibility gap and promote greater equality and inclusion for DDBHH consumers in the digital landscape.

5. Based on feedback from DDBHH respondents in DWCC's survey that emphasized **accessibility, independence, and clarity**:
    a. **76%** of respondents expressed the need for direct video communication with customer service in ASL or LSQ.
    b. **60%** required access to their own account via Website or smartphone app.
    c. **48%** needed clear instructions in plain language or a visual format
    d. **27%** stated that the ability to adjust font, colour, size was essential.

6. By mandating these features, telecom providers can create a more inclusive environment where DDBHH individuals have equal access to services. Direct video communication in ASL or LSQ would allow consumers to engage with customer service in their preferred language, improving both accessibility and customer satisfaction. Additionally, providing customizable options for text size, colour, and font would ensure that users with varying visual preferences and needs can navigate platforms effectively, promoting independence enhancing user experience.

Q2. Should the Commission only require that a minimum baseline of features or functions be offered as part of self-service mechanisms? Why or why not?

7. DWCC strongly believes that self-service mechanisms must go beyond a minimum baseline of features to ensure accessibility for all consumers, particularly for DDBHH individuals. It should go beyond the minimum to address specific needs such as language preferences, visual accessibility, and communication requirements. This approach would foster a more inclusive and equitable telecom environment, where all consumers can effectively manage their services without barriers.

8. DWCC's survey indicates that DDBHH respondents require these features that stressed **convenience, accessibility, and independence**:
    a. **72%** of respondents required direct video communication with customer service in ASL or LSQ.
    b. **63%** wanted access to discounts, including accessibility plans.
    c. **58%** needed the ability to view data usage.
    d. **52%** sought customizable notifications for bills, payments, and devices.
    e. **52%** needed to view new pricing and plan offers.
    f. **51%** required access to service plan details and the ability to change plans easily.
    g. **45%** wanted the option to pay bills online.
    h. **44%** needed to view past bills online.
    i. **43%** sought easy online account management.
    j. **40%** required information and updates on service outages.
    k. **34%** wanted the ability to reset passwords.

9. The rationale DDBHH respondents gave on why there should be basic features in self-service with their internet and wireless phone provider is due to these 3 reasons: **accessibility, independence, and transparency**. The survey results showed:
    a. **61%** of respondents desired to manage their own account anytime.
    b. **57%** wanted to understand their service plan.
    c. **53%** wanted to be able to quickly pay bills or check data usage.
    d. **52%** wanted to make changes or cancellations without asking for assistance.
    e. **49%** needed an easy way to switch settings on or off.

10. By including these essential features, telecom providers would address the unique needs of DDBHH consumers, ensuring they have the tools necessary to manage their services independently and effectively. **Direct video communication in ASL or LSQ allows for clear, real-time interactions in DDBHH's primary language.**

Q3. How should Canadians be able to access these self-service mechanisms? Should they be required to be made available on the service provider's website, through apps, over the phone, in stores and at kiosks, or using a different method? Why or why not?

11. DWCC strongly believes that DDBHH individuals should have the freedom and flexibility to choose how they access self-service options. Providing a range of accessible features such as video communication and easy-to-navigate online

platforms ensures that they can select the method that best suits their needs. This approach empowers DDBHH consumers and promotes greater independence and inclusion.

12. According to DWCC's survey, a significant number of DDBHH respondents expressed specific needs and preferences in accessing self-service.
    a. **63%** of respondents preferred using Video Relay Services.
    b. **62%** required direct video communication calls in ASL or LSQ.
    c. **62%** wanted access via apps.
    d. **50%** preferred using a Website.
    e. **47%** wanted access via text messaging.
    f. **46%** needed live chat.
    g. **36%** preferred an email link.
    h. **27%** expressed interest in QR codes.
    i. **23%** wanted access through in-store support or kiosks in malls.
    j. **22%** considered a Smart TV app to be a useful option.

13. These survey results highlight the diverse communication preferences of DDBHH individuals, underscoring the need for telecom providers to offer multiple options. By accommodating these varying preferences, providers can create a more inclusive environment where DDBHH consumers can manage their services with ease and confidence. Meeting these needs will not only improve user satisfaction but ensure that DDBHH individuals can fully participate in the digital and telecom landscape.

Q4. Should the Commission address concerns related to self-service mechanisms entirely replacing other ways customers can cancel or modify their contracts? Why or why not? Are there specific cases that should be treated differently?

14. The Commission should ensure that self-service mechanisms complement, rather than completely replace, other methods for cancelling or modifying contracts. DWCC believes that DDBHH respondents prefer self-service because they provide greater independence and flexibility. However, it is crucial to maintain alternative methods, as some individuals may require personal assistance or face challenges with self-service technology.

15. According to DWCC's survey, it was found that **speed, convenience, and independence** were useful to DDBH respondents in modifying or cancelling their contracts.
    a. **75%** of respondents found it faster and easier to make changes or updates.
    b. **57%** wanted to avoid waiting in line or on the phone for assistance.
    c. **51%** sought to prevent extra charges or fees.
    d. **43%** preferred managing their own accounts privately from anywhere.
    e. **39%** valued the ability to resolve issues independently and more quickly.

16. While self-service options provide significant benefits in terms of speed, convenience, and independence, it is important to recognize that not all DDBHH individuals may feel comfortable or capable of using these technologies. Maintaining alternative methods of communication ensures that those who need additional support or prefer more personal assistance can still have equal access to services. This balance helps foster inclusivity and ensures that all consumers can effectively manage their telecom needs.

Q5. How should the Commission ensure that self-service mechanisms are accessible to persons with disabilities?

17. DWCC firmly believes that there is a significant gap in telecom accessibility for DDBHH consumers, resulting in considerable barriers to obtaining services. These individuals have challenges that prevent them from accessing telecom services on an equal footing with their hearing counterparts. This disparity in service availability and accessibility limits their ability to fully engage with telecom options, creating unequal experiences in the market.

18. According to **DWCC**'s survey conducted for this proceeding:
    a. **84%** of those respondents require direct video communication in ASL or LSQ be enabled.
    b. **70%** want Video Relay Services to be enabled directly to their provider.
    c. **63%** need captions on all videos, and **52%** require plain language for easy reading.
    d. **51%** need the Website and app be user-friendly.
    e. **44%** need visual alerts or notifications to be provided.
    f. **27%** require bluetooth friendly for accessible options such as braille, screen reader compatibility.

19. To ensure that DDBHH consumers can fully participate in the digital age, it is crucial for telecom providers to implement these accessibility features. **By enabling direct video communication in ASL/LSQ and Video Relay Services by an immediate one-click**, DDBHH individuals will be empowered to access services with the same ease and efficiency as their hearing counterparts, fostering greater equality and participation in the telecom landscape. This is **a key fundamental accessibility issue that the Commission must address via regulatory policy** to ensure equitable access and inclusion for all consumers.

Q6. Should the Commission limit or prohibit potential fees that could be charged for any type of customer service? Why or why not?

20. DWCC strongly believes that the Commission must prohibit fees for any type of customer service to ensure that all consumers, including DBHHH individuals, can access support without financial barriers. Charing for customer service creates inequities and discourages individuals from seeking assistance when needed. Free access to customer service promotes equality, inclusivity, and better consumer experiences for everyone.

21. DWCC's survey found that **36%** of DDBHH respondents earn less than $35,000 annually. For the one-third of respondents in this low-income group, charging for customer service would impose a significant burden. This would create barriers to accessing essential support, further exacerbating inequalities and preventing individuals from receiving the help they need to manage their services effectively.

22. Additionally, the survey indicated DDBHH respondents' rationale for not being charged to use customer service. They were concerned about **accessibility, fairness, and affordability**.
    a. **64%** believe it ensures that help remains accessible and inclusive.
    b. **57%** want to avoid unexpected charges on their bills.
    c. **49%** wanted to remove barriers to getting help.
    d. **49%** felt it was the service provider's responsibility.
    e. **45%** each emphasized the importance of keeping service fair for everyone.
    f. **45%** thought it made it easier to access support when needed.
    g. **43%** sought to reduce unnecessary stress.

23. Charging for customer service not only places a financial burden on low-income DDBHH individuals but also undermines their ability to independently manage their services. By ensuring that customer service remains free, the Commission would

promote a more inclusive environment where DDBHH consumers can access the support they need without fear of financial consequences, thus fostering accessibility, fairness, and affordability for all.

Q7. How should the Commission contribute to the protection of customer privacy where machine learning or generative artificial intelligence may be used, consistent with the objectives of the *Telecommunications Act* and existing privacy rules related to confidential customer information?

24. **The DDBHH community in Canada faces significant accessibility barriers with AI-driven telecommunications services.** Unlike in the U.S., where Safe AI Sign Language initiatives are emerging, Canada lacks clear mandates to integrate **ASL/LSQ into generative AI and machine learning models.** Existing AI-based customer service tools, including speech-to-text and voice command systems, exclude sign language users, forcing them to rely on inaccessible methods. Without ASL/LSQ recognition, AI limits **independent communication and fails to serve DDBHH Canadians equitably.**

25. **AI-driven customer interactions also pose serious privacy risks for the DDBHH community**. AI models process voice, text, and video data, yet without ASL/LSQ integration, DDBHH users often have to rely on third-party interpreters or manual relay services—increasing the risk of data breaches and privacy violations. Additionally, generative AI may misinterpret user data, leading to **incorrect responses and security vulnerabilities.** To protect customer privacy, telecom providers should be **prohibited from processing or generating AI-based communications without explicit, informed consent**—which **must be provided in ASL/LSQ-accessible formats.**

26. To address these concerns, the **CRTC must mandate AI accessibility in telecommunications.** AI-powered customer interactions should be **fully accessible in ASL/LSQ before deployment**, and AI systems should be trained on sign language datasets to enable direct communication with DDBHH users. Furthermore, AI-generated customer data **must be protected under strict privacy regulations,** and consumers should be clearly informed—**in ASL/LSQ—about when AI processes their data.** AI decision-making, such as automated customer support and network prioritization, should be **explainable in an accessible format with opt-in/opt-out options.**

27. Finally, **the CRTC should establish an AI governance framework that prioritizes DDBHH accessibility and privacy.** No AI-based telecom service should be deployed without meeting **clear ASL/LSQ accessibility standards**, and telecom providers **must consult with DDBHH organizations (e.g., DWCC) before implementing AI policies.** Additionally, **AI models should be prohibited from collecting or monetizing sign language data without explicit user consent.** By enforcing these protections, the CRTC can ensure that **AI enhances, rather than hinders, equitable access** to telecommunications for the DDBHH community in Canada.

Q8. Should any specific service providers or classes of service providers be exempt from the requirement to offer self-service mechanisms? Why or why not?

28. DWCC **opposes exemptions** for any specific providers or classes of service providers. All providers should be subject to the same consumer protection rules. This would ensure that loopholes are not created, leading telecom companies to exploit them and create unfair fees that disproportionately harm accessibility consumers.

29. Furthermore, DWCC's survey highlighted the key benefits that DDBHH respondents experience from having self-service options.
    a. **79%** of respondents said it allows them to check their account services 24/7/365.
    b. **62%** found that it increases their accessibility options.
    c. **52%** said it helps them resolve technical and general issues faster and without delays.
    d. **46%** wanted the ability to make changes or cancellations independently.
    e. **37%** preferred having alternative options to customer services.

30. By ensuring that all providers adhere to the same consumer protection standards, the Commission can prevent discriminatory practices and ensure that accessibility consumers receive fair and equitable treatment. Self-service options play a critical role in bridging accessibility gaps, but they should complement, not replace, comprehensive customer support. A consistent regulatory framework will help maintain transparency, prevent unfair fees, and promote an inclusive telecom environment for all consumers.

Participation in the proceeding

31. DWCC looks forward to contributing our documents to this critical proceeding and engagement in the reply phase with other stakeholders' submissions.

32. With this, we submit a Survey Analysis that includes respondent answers to questions that pertain to removing barriers to switching plans. Follows is an *Executive Summary* of the accompanying survey report which will also soon be available on DWCC's website.

Executive Summary

33. **ES1:** This report, prepared for the CRTC as part of its public consultation on improving consumer choice in wireless and internet services, particularly on enhancing self-service mechanisms, for Telecom Notice of Consultation CRTC 2024-295, examines the experiences and perspectives of Deaf, Deaf-Blind, and Hard of Hearing (**DDBHH**) Canadians.

34. **ES2:** Deaf Wireless Consultative Committee (**DWCC**) submitted this report with the goal to provide a comprehensive snapshot of the lived experiences of DDBHH Canadians, aligned with the experiences of Committee and Board members regarding self-service for wireless phone and internet services. The report includes quantitative data from **224 survey participants**, to provide evidentiary support.

35. **ES3:** Following the Commission's announcement of this proceeding, DWCC sought to provide concrete evidence of the barriers DDBHH Canadians faced when using self-service. They determined that conducting a nationwide survey would be the most effective way to gather and share relevant information with the CRTC. This method not only provided comprehensive insights for the proceeding but also contributed valuable evidence to help eliminate barriers to information technology. It aligns with the Accessible Canada Act, particularly increasing the accessibility of self-service to DDBHH consumers.

36. **ES4:** The widespread use of wireless phones and internet over the past three decades has greatly enhanced global connectivity, especially for DDBHH Canadians. These services have enabled them to access information more quickly and communicate via sign language, both personally or professionally. Additionally, wireless phones and the internet provide crucial links to education, politics, news, and entertainment, helping ensure that the **357,000 culturally Deaf individuals**[1] in Canada are less likely to be left behind.

[1] Based on the CAD-ASC 2015 Statistics on Deaf Canadians - Canadian Association of the Deaf - Association des Sourds du Canada

37. **ES5:** Among DDBHH respondents, **94%** have a wireless data plan, with **70%** using an Apple iPhone and **87%** having a home internet plan. The top three priorities for self-service mechanisms are accessibility, independence, and clarity. Additionally, **76%** desire direct video communication customer service in ASL/LSQ and **63%** seek access to discounts, such as accessibility plans.

38. **ES6:** Many DDBHH respondents reported facing significant barriers in self-service platforms due to **limited 24/7 access**, making it difficult to manage accounts or resolve issues outside business hours. **Complex and inaccessible designs** with excessive steps and text-heavy content further hinder usability, as these platforms are primarily designed for hearing users. The **lack of direct video communication in ASL/LSQ** forces reliance on text-based or voice-dependent options, creating additional communication barriers. Additionally, **inconsistent accessibility features** across platforms—such as missing visual instructions, adjustable fonts, and clear navigation—make self-service unpredictable and frustrating. Addressing these issues requires standardized, inclusive, and accessible self-service solutions.

39. **ES8:** DWCC has provided clear evidence to the CRTC that self-service platforms must be **accessible 24/7** with **ASL/LSQ-friendly features** to ensure DDBHH users can manage their accounts anytime. A **visual-first design** with simplified navigation, plain language instructions, and intuitive layouts will enhance usability. **Direct video communication in ASL/LSQ** should be prioritized to eliminate barriers and provide seamless support. **Standardized accessibility features**, such as font and color adjustments and visual instructions, are essential for consistency. Without these improvements, DDBHH users face unnecessary delays and reduced independence. To ensure **equitable access** and uphold **fairness, affordability, and accessibility** under the **Accessible Canada Act**, the CRTC must act to remove these systemic barriers.

40. **ES9:** To address these challenges, DWCC offers some final recommendations. To enhance accessibility, self-service platforms must offer **24/7 support**, including **ASL/LSQ-compatible solutions like direct video communication** which should be integrated to allow DDBHH users to communicate in their primary language without relying solely on text. Additionally, there should AI-assisted chat **with human oversight**. Platforms must also feature **user-friendly, inclusive designs** with simplified navigation, clear instructions, and visual elements. Additionally, **standardized accessibility features**, such as adjustable fonts, color contrast, and visual-first instructions, should be implemented to ensure a seamless and equitable user experience. These measures will help create a more equitable experience with telecommunications self-service mechanisms for DDBHH Canadians.

Wrap Up

41. DWCC trusts it accumulated sufficient evidence, concerning its accessibility group to significantly and meaningfully contribute to the CRTC proceeding **TNC CRTC 295-2 Call for comments – Making it easier to choose a wireless phone or Internet service – Enhancing self-service mechanisms – Intervention**

42. DWCC appreciates the Commission's consideration of its Interventions and survey analysis report document submitted thereafter. Should you have any questions, please do not hesitate to contact the team.

Sincerely,

Jeffrey Beatty, Chair
Deaf Wireless Canada Consultative Committee -
Comité pour les Services-Services Sans fil des Sourds du Canada (DWCC-CSSSC)

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