Filed electronically

December 31, 2019

Mr. Claude Doucet
Secretary General
Canadian Radio-television and Telecommunications Commission
Ottawa Ontario K1A 0N2

Subject: Requirement to report to CRTC plans and time frames for mobile wireless operations to support an RTT relay service outlined in Telecom Regulatory Policy CRTC 2018-466, Review of the regulatory framework for text-based message relay services

Dear Mr. Doucet:

Introduction

1. The Canadian Wireless Telecommunications Association ("CWTA") is pleased to submit the following report to the Canadian Radio-television Telecommunications Commission (the "Commission" or the "CRTC").

2. At paragraph 208 of TRP CRTC 2018-466, *Review of the regulatory framework for text-based message relay services*, ("TRP 2018-466") the Commission directed Bell Canada et al. ("Bell"), Rogers Communications Canada Inc. ("RCCI"), Shaw Telecom G.P. ("Shaw"), TELUS Communications Inc. ("TCI"), and Videotron Ltd. ("Videotron") (collectively the "Larger WSPs") to file a report with the Commission describing their plans and time frames for their mobile wireless operations to support a Real-Time Text ("RTT") Relay service, including how RTT Relay service would meet the minimum requirements set out in Appendix 1 of TRP CRTC 2018-466, and to describe the consultations with persons with disabilities that have been undertaken.

3. This report is being submitted by CWTA to meet the reporting obligation placed on the Larger WSPs in paragraph 208 of TRP 2018-466.

Integration and Implementation

4. Without a clear mandate for key industry stakeholders to discuss the integration and implementation of RTT Relay through the CRTC Interconnection Steering Committee ("CISC"), it is difficult for Larger WSPs to determine and clearly articulate their future plans for an RTT Relay service.

5. RTT Relay services, to the limited extent they currently exist around the world, are relatively new and in various stages of implementation. In the U.S., the Federal Communications Commission has opened a Further Notice of Proposed Rulemaking[1] (FNPRM), and is in the process of seeking comment on integration of RTT into telecommunications relay service operations. In Europe, it appears that RTT Relay service has been launched in a few countries in an over-the-top architecture.

6. In Canada, more research would be required in order to examine various implementation options and determine which one is most suitable for a Canadian RTT Relay service.

7. During the proceeding that led to TRP 2018-466, Bell and RCCI recommended that the Commission ask the CISC to develop a TTY to RTT migration plan for wireless networks.[2] Bell submitted that one of the first technical considerations when implementing RTT Relay service on wireless networks would be the development of a standard interface to enable the sending of RTT traffic to an RTT Relay service centre.[3]

8. In TRP 2018-466, the Commission asked the Larger WSPs to report on their plans and time frames to launch an RTT Relay service. However, the Commission did not ask the CISC to work on RTT Relay implementation issues. As a result, the necessary research and industry consultation required to provide definitive plans and timelines for RTT Relay does not exist.

9. As of December 2019, the Larger WSPs have no immediate plans to develop an RTT Relay service.

Timeline

10. Should the Commission mandate RTT Relay, most WSPs would likely contract this service from a third party, as is the case for IP Relay today. Given the anticipated relatively low demand for message relay services such as RTT Relay, a third party is likely the most efficient provider of such a service.

11. Considering the likely involvement of an as-yet-unknown third party provider, the below timelines are necessarily subject to the availability and timing of any such third party provider. Without this information, any timelines are limited to educated speculation.

12. Should the Commission mandate RTT Relay, WSPs would require, at minimum, approximately 21 to 30 months to implement RTT Relay services.

13. An optimistic timeline for the roll-out of RTT Relay service would include the following:
    - *RTT vendor selection (Establish requirements and RFP process) = 9-12 months from CRTC decision;*
    - *RTT network readiness (build SIP interconnection with RTT Relay provider, test and launch) = 12-18 months from vendor selection;*
    - *Launch = 21-30+ months from CRTC decision.*

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[1] https://docs.fcc.gov › public › attachments › FCC-16-169A1
[2] TRP 2018-466, paragraph 194.
[3] TRP 2018-466, paragraph 195.

14. This timeline is premised on the assumption that WSPs will have been able to develop a common architecture for RTT Relay service in Canada. As described in detail above, such integration and collaboration is not currently in place and is a necessary prerequisite to any timeline for the roll-out of RTT Relay service.

15. WSPs expect that any RTT Relay service would meet the same quality service standards as currently exist for MRS, as identified in TRP CRTC 2018-466. However, at this early stage it is difficult to appreciate any challenges that may be identified, particularly with respect to third party providers.

Consultations with Accessibility Groups

16. In February 2019, CWTA undertook an industry-wide consultation process on behalf of its members[4], and in association with Cogeco Communications Inc. ("Cogeco") and TCI.   This Carrier-initiated consultation process, involving ten participant organizations[5], was carried out to determine how the minimum functionality requirements, as outlined in *Appendix 1* of TRP CRTC 2018-466, would be achieved for text-based MRS.

17. The comprehensive two-part consultation process, involving both a written questionnaire and in-person meeting, addressed the general and technical necessities of MRS from the perspective of users who were Deaf (used ASL, LSQ), Deaf-Blind, Hard of Hearing, and those with speech impairments not resulting from deafness (collectively DDBHHSI).[6]

18. Organizations representing the accessibility community (collectively "Accessibility Groups") provided feedback on the requirements that must be implemented in any text-based MRS application, including RRT Relay, to meet the needs of DDBHHSI users, especially those that are Deaf-Blind.

19. Accessibility Groups agreed that meeting the minimum requirements outlined in *Appendix 1* of TRP CRTC 2018-466 would improve accessibility of MRS for DDBHHSI users.

20. Feedback collected from Accessibility Groups through both the questionnaire and in-person meeting clarified that any text-based MRS deployed in the future should incorporate the following considerations:
    a. Ease of use;
    b. Adaptable and customizable options;
    c. Compatibility across platforms and operating systems;
    d. Additional training for MRS operators in areas such as confidentiality, diversity, and cultural sensitivity.

21. Should additional consultation be required, it would be more beneficial to undertake it as the service is being developed and deployed.

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[4] This included Bell, Eastlink, Rogers, SaskTel, Shaw (Freedom Mobile), Videotron and Xplore Mobile.
[5] A list of participating Accessibility Groups was provided to the Commission on June 14, 2019.
[6] A detailed account of the industry-wide consultation, undertaken by CWTA, was provided to the Commission on June 14, 2019.

22. Additionally, we believe that the needs of Accessibility Groups and the broader accessibility community may be met by the new and upgraded IP Relay platform and app, which are in the process of being implemented per the requirements of TRP CRTC 2018-466. This new and upgraded IP Relay platform and app may ultimately render RTT Relay redundant and unnecessary. As a result, it would be beneficial to postpone further consideration of RTT Relay until Accessibility Groups have had the opportunity to use and consider the new and upgraded IP Relay platform and app.

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