cwta Association canadienne des télécommunications sans fil
Canadian Wireless Telecommunications Association acts

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

Subject: Carrier requirement to report to CRTC regarding Minimum Requirements 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. In February 2019, CWTA undertook an industry-wide consultation process on behalf of its obligated members, and in association with Cogeco Communications Inc. (Cogeco) and TELUS (TCI), in relation to Telecom Regulatory Policy CRTC 2018-466, Review of the regulatory framework for text-based message relay services.

3. At paragraph 154 of TRP CRTC 2018-466, the Commission directed carriers (wireline and wireless) to consult accessibility groups to determine how the minimum functionality requirements outlined in *Appendix 1* of TRP CRTC 2018-466 would be achieved for IP relay service, and to file a report with the Commission describing the outcomes of discussion.

4. This report is being submitted by CWTA to meet the reporting obligation placed on Bell Canada et al., Cogeco, Eastlink, RCCI, SaskTel, TCI, and Videotron. Shaw will be submitting its own report, which will also include outputs from the joint consultation.

Consultations with Accessibility Groups

5. For the purpose of this report, carrier participants will be referred to as "Carriers" and accessibility group participants will be referred to as "Accessibility Groups".

Structure of Consultation:

6. In developing an industry-wide approach to the carrier-initiated consultation, Carriers agreed that working collaboratively would yield the best, and most consistent, end-results. A joint approach would ensure that all impacted Carriers had benefit of a uniform approach, and that all had access to the same baseline information.

7. Joint consultations also ensure that there was no undue hardship placed on accessibility groups in meeting with multiple organizations concerning the same topic area. Working collaboratively also allowed Carriers, especially those more regional in nature, access to a variety of accessibility groups that might not normally work with those respective Carriers, and vice versa.

8. The consultation with accessibility groups included two phases: Questionnaire, and In-person meeting.

Questionnaire:

9. A questionnaire soliciting additional information concerning the elements included in *Appendix 1* of TRP CRTC 2018-466 was developed with Carrier input.

10. Since the CRTC's formal review of MRS had already yielded substantive information concerning MRS and ways that it could be improved, the objective of the questionnaire was to confirm information already on record, and to solicit more granular and specific information. Specificity of information would allow Carriers to better understand what was being requested, and the reasoning behind it from a practical user perspective.

In-person Meeting:

11. An in-person meeting occurred in Ottawa on April 30th. The objective of this full-day meeting was to discuss feedback provided, and to further refine understanding of both accessibility groups and Carriers as it related to proposed solutions, as well as challenges in meeting those solutions.

12. The meeting was held in spoken English, ASL, LSQ, and LSQT. Support was provided to accessibility groups via intervenors, interpreters and CART services.

13. An agenda was developed by Carriers in order to facilitate discussion, and ensure outstanding questions were addressed. Accessibility Groups were encouraged to provide feedback on their lived experiences to illustrate how they interact with the service.

Participants:

14. Invitations were extended to nineteen organizations representing a variety of communities that might access IP relay services. These groups represented users including those that were Deaf (used ASL, LSQ), Deaf-Blind, Hard of Hearing, and those with speech impairments not resulting from deafness (collectively DDBHHSI). Groups also represented multiple languages, as well as national, and regional interests.

15. Addendum 1 identifies the groups invited to participate, as well as those that provided input at each phase.

16. Carriers also provided a broad spectrum of participants representing multiple points of view: third-party service provider, wireline and wireless customers of third-party service provider, wireline and wireless customer of 'other' third-party service provider.

Overview of Feedback

17. It should be noted that the synopsis of feedback provided by Accessibility Groups that is included within this report is to identify the nature of discussions which occurred, and should not be considered as agreed upon solutions. All feedback that was provided will be reviewed by Carriers in order to determine feasibility and impact.

Questionnaire:

18. Feedback provided via questionnaire was comparable in nature to that provided as part of the formal CRTC process.

19. Accessibility Groups confirmed that meeting the minimum requirements identified in *Appendix 1* of TRP CRTC 2018-466 – whether by websites or app – would improve accessibility and usability of relay services.

20. In broad strokes, Accessibility Groups identified similar points of view:

- IP relay services should provide functional equivalence;
- IP relay services should provide a more accessible desk-top web experience, as well as one that was supportable via mobile device.
- IP relay services should be provided by an app, in addition to websites.
- IP relay services should be supportable by more customizable features. This includes the ability for users to access things like Voice Carry-over (VCO) and Hearing Carry-over (HCO), as well as features that would allow for ease of use (i.e. font, colour, background), via the "front-end", and not only via settings.
- IP relay should support a more user-friendly registration and log-in process.
- IP relay operators should receive adequate training, including about Deaf culture, to facilitate their ability to effectively deliver service.

21. The overall feedback from Accessibility Groups identified that the DDBHHSI communities were very diverse, and there was no "standard" approach that would be universally workable. Whether solutions were provided via website, or app, the solution would need to allow for customization, especially to be accessible for Deaf-Blind users.

In-person Meeting:

22. The in-person meeting yielded similar feedback to that received via questionnaire, however, because of the ability to interact, Accessibility Groups and Carriers were better able to convey specific examples and challenges.

23. Accessibility Groups were able to provide helpful and practical information based on lived experience, and their knowledge of other jurisdictions. Their view was that, from a service development perspective, customization is important, and that users should be involved in the process to ensure the service met identified needs.

24. Below is a summary of the input received from the various Accessibility Groups.

TTY

25. TTY is seen as both an outdated technology and a life-line at the same time, depending on which community you ask. TTY is still seen as vitally important for certain segments of the population (primarily seniors and those that are Deaf-Blind) and there was a concern about those groups being left behind if their technological needs were not considered. Others noted that a discussion concerning TTY was not the best use of time and suggested that the focus should be on other technologies, like Captioned Telephone Service (CTS) instead. The general notion was that Canada was significantly behind other jurisdictions.

Experience equivalency –

26. Accessibility Groups noted that a hearing person has the benefit of knowing specific information purely based on their ability to hear. For example, it is possible to understand gender, language (accents), disruptions in the environment (dog barking, noise), etc. All of these elements impact how messages are delivered and received. For consumers that are Deaf, Deaf-Blind, and Hard of Hearing (DDBHH), those indicators are not available so it becomes even more important for a TTY operator to identify them.

TTY operator – language, training, typing speed –

27. Accessibility Groups noted that TTY operators should be bilingual in order to ensure that they can provide service as required.

28. Accessibility Groups noted that some TTY operators do not have appropriate cultural sensitivity or awareness when it comes to dealing with users of the service.

29. It was also noted that not all TTY operators relay the conversation verbatim, as it is presented, by the DDBHH user. TTY operators do not always seem to understand language barriers (i.e. literacy issues), and language standards (i.e. acceptable vs. not-acceptable language), as well as how to provide services in a respectful and non-judgmental fashion.

30. Without proper training TTY operators are not able to adequately meet the cultural needs of the DDBHH communities.

31. Accessibility Groups noted that typing speed of TTY operators was often an issue, but from the perspective of typing too quickly for users that are Deaf-Blind. In some instances TTY operators have to be asked to slow down so that users are able to view content.

IP relay

32. A user's ability to access IP relay effectively will depend on numerous factors. While IP relay is a good tool for most, Accessibility Groups suggested that additional consideration be given to ensure it is fully accessible for all, especially for consumers that are Deaf-Blind or low-vision. Using IP relay for those that are Deaf-Blind is challenging, especially when compared to TTY, and the service as it currently exists is inaccessible to them.

33. Accessibility Groups suggested that IP relay services support current technology as well as technological changes, for example being accessible by mobile device, support blue-tooth connectivity.

34. While an app is the desired mechanism for IP relay, Accessibility Groups noted that updating websites and making them more user friendly would also resolve many of the currently identified challenges with the system.

Accessing IP relay –

35. Accessibility Groups noted that the current IP relay websites were not user friendly and were cumbersome to use, especially when viewed on a mobile device. Users had to pan in/out and across the device screen in order to be able to access relevant areas. The conversational boxes were also static which could cause confusion in following a conversation, especially for those with low vision and using a Braille reader.

36. Identified issues with the registration and log-in process stemmed partially from the current website configuration, especially when displayed on a device. Other noted items included the need for a simpler log-in process that was more intuitive, user-friendly and streamlined.

37. Deaf-Blind participants noted that not all browsers are "low vision friendly", especially Chrome. In order to allow for accessibility, this would need to be taken in to consideration.

38. If an app were to be developed, Accessibility Groups noted that it would be ideal if the apps were standardized to ensure that all users will have access to the same service regardless of carrier, and that moving to another carrier does not require a user to re-learn how to use the service.

Customization – "Front end" vs. "Back end" –

39. Accessibility Groups noted that certain functionality – like "call-back", VCO and HCO – needed to be more easily accessible. Having the functionality in the "back end" via user settings often resulted in dropped calls, and overall frustration in using the system. Moving the functionality to the user interface would allow for easier access.

40. This was also the case for customizable features. Since no set standard was applicable to all users, especially, the Deaf-Blind, the ability to modify fonts, sizes, colours, etc. allowed for greater accessibility.

MRS operator – language, training, typing speed –

41. Accessibility Group comments included in paragraphs 27 to 31 are also applicable to MRS operators.

Notifications –

42. Accessibility Groups noted that notifications were an essential part of an accessible IP relay service. Without a method for notifications to occur it would be difficult for users to know when someone was trying to reach them. This was applicable regardless of whether the service was being delivered via website (desktop/mobile) or app.

43. No specific method of notification would meet the needs of all groups.

Syncing text with Braille –

44. Deaf-Blind users expressed frustration with how the text and Braille functions worked. Users noted that the Braille was often not properly displayed so by the time they made adjustments they had missed chunks of conversation which made it necessary to go back to the beginning to see/read the full text. This resulted in conversations that had long lags, and operators (and recipients) waiting for responses.

Other items –

45. In addition, Accessibility Groups also highlighted additional elements not directly related to the minimum requirements of *Appendix 1*:

- Practical ways IP relay service could be improved to meet needs, especially for those that are Deaf-Blind;
- Practical ways that the training of IP relay operators could be improved to better meet the needs of the DDBHHSI communities, including training by members of the communities.
- Practical ways to educate and inform users so that they are aware of services.
- Practical ways to continue discussions between Carriers and Accessibility Groups, including mechanisms to provide ongoing input, annual meetings, and collaboration to move solutions forward.

Conclusion

46. The consultative process provided both Accessibility Groups and Carriers the opportunity to better understand user needs, as well as the diversity of user needs, and the challenges that this brought to providing a standardized solution.

47. Discussion concerning practical solutions was especially helpful.

48. The in-person meeting emphasized a broad willingness for all groups to work collectively and collaboratively, including via future consultations, to discuss identified issues and establish appropriate joint goals.

Addendum 1

MRS Consultation Questions:
Organization feedback:
If you are representing multiple organizations with your response, please identify which organizations those are.

Feedback provided via previous interventions:

1. If you have previously provided feedback to the Commission, is the feedback shared as part of your intervention still valid? What additional information should be included for consideration?
2. Would addressing each of these items, whether by mobile-friendly website or app, provide a workable solution for Deaf, Deaf-Blind, Hard of Hearing or Speech Impaired (DDBHHSI) customers:
    a. IP Relay version that is easily accessible on mobile devices, including improved login functionality.
    b. Adaptable and accessible for individual user, to the degree that this is possible.
    c. Customized for accessibility (following WCAG 2.0 standards).
    d. Compatible across platforms and operating systems.
    e. Include enhanced features to simplify the process for call-backs, and process for leaving messages.
3. How would you propose meeting the ability for 'seamless and responsive back and forth interactive communication'?

General MRS feedback:

4. What suggestions would you make for users of VCO (Voice Carry-Over) and HCO (Hearing Carry-Over) interactions?
5. How can service providers improve access to IP Relay on mobile devices?
6. Are there any concerns specific to wireline services that require attention?

Technical/Functional

7. What additional technical requirements have been identified that are not included in (2)?
8. Outside of being braille display compatible, is there any other compatibility that needs to be considered.
9. What design standards should be used by service providers (eg. text size/colors, contrast, widget layout)?
10. What is your preferred format for visual notifications (eg. font size, layout, content)? Are there default settings that should be used?
11. Are apps like Google's Sound Amplifier and Live Transcribe providing alternatives to relay services?

Promotion, Other

12. Other than website information, in what way can service providers effectively promote MRS service to DDBHHSI customers?
13. Are there concerns with privacy that are not being addressed by the current MRS offerings?
14. How would you suggest that MRS user's experiences with businesses and organizations that refuse relay calls based on "privacy concerns", or other reasons, be addressed?
15. Are there any other concerns that have not been addressed in the above-noted topics?

Addendum 2

Organization	Questionnaire	In-person
Association du syndrome de Usher du Quebec (ASUQ)		X
Association Ontarienne des Sourd(e)s francophones (AOSF)		
Canadian Association of the Deaf-Association des Sourds du Canada	X	X
Canadian Deafblind Association		
Canadian Hard of Hearing Association		X
Canadian Hearing Society	X	X
Canadian National Society of the Deaf-Blind	X	X
CNIB		X
Communication Disabilities Access Canada		
Confédération des organismes de personnes handicapées du Québec (COPHAN)		
Consultant - Accessibility Lens	X	X
Deaf Wireless Canada Consultative Committee	X	X
Deafness Advocacy Association NS	X	X
Le Réseau québécois pour l'inclusion sociale (ReQIS)		X
Media Access Canada		
Ontario Association of the Deaf		
Saskatchewan Deaf and Hard of Hearing Services (SDHHS)		
Société culturelle québécoise des Sourds (SCQS)		
Society of Deaf and Hard of Hearing Nova Scotians (SDHHNS)	X	

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