

October 19, 2023

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

Dear Mr. Doucet:

Subject: Telecom Notice of Consultation CRTC 2021-102-4 – Final Reply – Review of video relay service (Public record: 1011-NOC2021-0102)

Introduction

1. Pursuant to the amended procedure outlined in Telecom Notice of Consultation (“TNC”) 2021-102-4, the Canadian Telecommunications Association¹ provides its final comments concerning the review of video relay service.
2. The Canadian Telecommunications Association (the “Association”) is an industry association dedicated to building a better future for Canadians through connectivity. Our members include service providers, equipment manufacturers, and other organizations in the telecommunications ecosystem, that invest in, build, maintain and operate Canada’s world-class telecommunications networks. Through our advocacy initiatives, research, and events, we work to promote the importance of telecommunications to Canada’s economic growth and social development, and advocate for policies that foster investment, innovation, and positive outcomes for consumers.
3. The following comments are being submitted on behalf of telecommunication service providers (“TSPs”) that have participated in collaborative industry activities to advance accessibility: Bell Canada and its affiliates, Cogeco, Eastlink, Freedom, Rogers, SaskTel, Tbaytel, TELUS, Videotron, and Xplornet Communications Inc.

¹ Previous interventions on this file had been submitted under the name “Canadian Wireless Telecommunications Association” or “CWTA”.

4. The Association and identified TSPs have reviewed the transcripts of the virtual discussions and acknowledge the user experiences described by some participants. In this intervention, we intend to limit our comments to our primary objective of ensuring the ongoing utilization of a single, centralized video relay service (“VRS”) platform in Canada. Failure to address any other issue identified during the virtual discussions that occurred in January 2023 should not be construed as our agreement with any opinions expressed, or preliminary positions taken in the TNC. In addition, to the extent that any comments in this intervention conflict with a comment of an Association member, the comment of the member shall prevail with respect to that member.

The Commission Should Maintain a Single, Centralized VRS Platform

5. The Association continues to support the existing model of a centralized administrator for VRS. This model offers the most benefits for VRS users and supports an efficient and economical delivery of the service.
6. The transcripts of the virtual meetings include calls from some interveners to establish a competitive VRS delivery model. Much of the rationale for this stems from the assumption that multiple providers will improve certain deficiencies that interveners have identified in relation to customer service or perceived technical limitations of the platform.
7. The Association is not calling in to question the views or concerns of the interveners in relation to their experiences while using VRS. However, there is no evidence to support the position that the addition of new VRS providers would solve the identified concerns. In fact, many of the issues that interveners have identified would likely be further exacerbated if additional service providers were to compete for limited resources.
8. In addition, the Association continues to believe that the introduction of a competitive model for the delivery of VRS could jeopardize the quality and level of service already achieved by CAV and would dilute the already limited pool of available resources, notably interpreters in Canada. This could cause service delivery challenges and would hamper the ability of users to access VRS. A move to a multi-provider VRS model would also likely result in increased costs not only to CAV, but to the competing providers.

9. Based on data provided in its 2022 Annual Report, the VRS service has 9,294² registered users. CAV has invested significant time and resourcing to reach this milestone since the launch of VRS in 2016. It is unclear how this number of users could support a viable, competitive market for any additional VRS provider and still maintain the current in-market service.
10. Therefore, changing the structure of CAV or introducing a “competitive model,” would negatively impact the operations of the current system without delivering any additional benefit to VRS users as it would jeopardize the current level and quality of service that the CAV has achieved.

Conclusion

11. The Association thanks the Commission for the opportunity to provide feedback on this important proceeding and looks forward to the ongoing collaborative discussion.

²² A Part of Life in Canada CAV-ACS Annual Report 2022, Page 9 and 10.