

THE COMPANIES – OPENING COMMENTS

I. INTRODUCTION

1. Thank you Madam Secretary and Commissioners. I am Jonathan Daniels, Vice-President Regulatory Law at Bell Canada. With me today are, to my left, Bill Abbott, Senior Counsel and Bell Privacy Ombudsman; to Bill's left, Cindy Jones-Sherk, Manager – Accessibility at Bell Residential Services; and to my right, Suzanne Morin, General Counsel – Regulatory and Privacy Chief at Bell Aliant.

II. BRINGING VRS TO CANADA

2. It is clear from the thousands of comments submitted by deaf and hard of hearing individuals and groups that VRS has the potential to significantly improve the personal, social, and employment-related communications of Canadians.

3. Having read the record of this proceeding, and sat here and heard what you have heard, we have no doubt that you will reach the same conclusion that we have reached: it is now time to move forward with the implementation of VRS in Canada.

4. One might ask, what has changed from the last time we discussed this issue? Five years ago, the Commission conducted a proceeding that examined, among other issues, whether VRS should be implemented in Canada. The need for VRS was articulated then, though perhaps not with the same force and eloquence as it has been articulated this week. But the Commission was in no position to order VRS at that time because there was far too much unknown and too many uncertainties. A lot has happened since.

5. Telus has completed its trial. In addition, we now also have the benefit of Mission's feasibility study which provides an answer to the core question of how to implement VRS in Canada. We worked with accessibility groups in a collaborative and iterative process that began with the creation of the RFP and selection of Mission Consulting and continued to the final draft of the Mission report, which laid out the feasibility of a VRS service in the Canadian context.

6. Despite the way it is sometimes referred to for convenience in the record, the Mission report is just that – a report from Mission Consulting and not from Bell Canada. We and all of

the other groups that were involved recognized that it was essential that Mission be independent. Indeed, we do not agree with all of Mission's recommendations, although we do agree with almost all of them.

7. Mission conducted extensive research and outlined numerous details relevant to VRS but there are still some things we don't know. Nonetheless, as we will explain, that does not mean we cannot move forward: we can and we should. We believe the Mission report lays out the road map of how to do just that. But first it helps to take stock of what it is that we know and don't know.

III. WHAT WE KNOW

8. So what do we know?

i. VRS Is Needed:

9. First, the record clearly demonstrates that VRS is needed. It should be available in both ASL and LSQ and provided free to its users.

ii. Accessibility Groups Need to Participate

10. Second, we note that everyone agrees that the accessibility groups desire and need to be at the table.

iii. There is An Interpreter Shortage

11. Finally, we do not have enough interpreters to launch VRS at full deployment in either ASL or LSQ without completely undermining the interpreter services used in those communities today.

12. Yesterday we heard from AVLIC that they have 700 members, although there are more interpreters in the total market. Mission estimates the existing pool of interpreters to be roughly 800, with over 200 of them already working for American VRS providers. Mission also estimates that it would take 588 interpreters to provide 24/7 service in ASL and LSQ to a little over 15,000 users. Some parties have criticized Mission's estimate of the number of users and average minutes per user per month as being too little. As such, if anything, Mission's estimate of 588 interpreters may be too low. How can we expect to launch a service that takes at least 588 interpreters when there is only a total pool of 800 interpreters, 200 of whom are already

working for American VRS providers? In fact, we already heard from some parties that there are not enough interpreters today; if a deaf or hard of hearing person has to wait 2 weeks to get an interpreter for an appointment, that does not sound like an oversupply.

13. To us, the math is clear: there are simply not enough interpreters. With the six existing interpreter training programs being full, this problem will not be solved unless we tackle it at the source – by funding the entities that train interpreters to allow them to expand their capacity, but only as initial grants tied to directly supporting the implementation of VRS. I know I am slipping into advocacy in a section which is supposed to be limited to agreed facts, but for us this stark reality has to inform the decision of how we collectively proceed. We share the sentiments of those who do not want the interpreter shortage to become a reason not to proceed with VRS or to delay its implementation. It is this reality that underlies the Mission recommendations. And it is also the reason, we believe, that the accessibility groups that worked with Mission on the Report, support their conclusions.

IV. CE QUE NOUS NE SAVONS PAS

14. Même si maintenant nous avons tellement plus de connaissances au sujet du SRV que la dernière fois que nous étions devant la Commission en 2008, il demeure encore plusieurs inconnus. Seulement une expérience plus pratique et approfondie pourra éventuellement apporter la certitude nécessaire.

i. Le coût est inconnu

15. Le coût total d'offrir le SRV au Canada est un inconnu de toutes importances. Les trois variables qui détermineront le coût total d'offrir le SRV sont : i) le nombre d'utilisateurs (de 15,345 à 25,000), ii) le nombre moyen de minutes d'interprétation de SRV par utilisateur (de 37 à 107 minutes) iii) et le coût par minute d'interprétation de SRV (de 3,49\$ à 5,94\$). Différentes combinaisons de ces variables sont responsable du fait qu'il y a une différence de presque 300% entre l'estimation la plus basse et celle qui est la plus haute. La réalité est tel que nous ne pouvons savoir le coût d'offrir le service de relais vidéo avec aucune certitude.

ii. Le temps pour se rendre au déploiement complet est inconnu

16. Nous sommes aussi dans l'impossibilité de savoir à ce stade le temps qu'il nous prendra pour se rendre au déploiement complet du SRV. Le déploiement complet dépend dorénavant d'une source adéquate d'interprètes pour combler la demande du SRV sans nuire aux services

communautaires d'interprétation. Nous sommes tous d'accord qu'il est nécessaire d'augmenter la capacité afin de supporter le déploiement complet, mais nous ne saurions jamais combien de temps ça nous prendra à moins de démarrer le processus.

iii. Comment fournir le relais des appels d'urgence aux centres 9-1-1

17. Un autre inconnu soulevé par plusieurs partis y inclus la Commission est la question à savoir comment le SRV fournira le relais des appels d'urgence aux centres 9-1-1. C'est un défi qui soulève des questions techniques et complexes qui ne sont pas eux uniques au SRV et qui ne peuvent être résolues facilement. Même si le défi n'est pas elle-même insurmontable, nous ne savons pas encore la réponse exacte.

V. BELL'S POSITION

18. I want to turn now to the position we take in light of the things we know and don't know.

i. Central Fund Model Makes the Most Sense

19. The Commission listed in the Notice of Consultation two basic models for funding and administering VRS: the "MRS" model and "central fund" model. We will not repeat all the reasons others have given for rejecting the MRS model, but note in addition that it would exacerbate the existing interpreter shortage.

20. We, like almost everyone else, endorse the "central fund" model. The existing processes associated with the National Contribution Fund could be leveraged to support the collection of funds for VRS with limited additional administrative burden. In our view, the contributions collected should be based on all Canadian Telecommunications Service Revenues, including Internet revenues, which makes sense when you consider how VRS will be provided. All of the information required to collect the funds on this basis is already being reported to the Commission and could easily be used for this purpose.

ii. VRS Should be Overseen by an Independent VRS Administrator

21. These funds would be used by an independent VRS Administrator to provide VRS across Canada. The VRS Administrator would be overseen by representatives from deaf and hard of hearing user groups, telecommunications service providers, and individuals that are independent from any stakeholder group. The VRS Administrator would have greater expertise

and be more efficient and accountable than either a system comprised of a patchwork of individual companies under the MRS model or one that simply outsources VRS in Canada to an existing provider.

22. Over the course of the week, the Commission has floated two other hybrid models. These hybrid models should also be rejected. We don't see how these models offer better solutions than the "independent VRS Administrator" model. They don't solve the problem of the interpreter shortage and will likely raise the overall cost of the service.

iii. Single VRS Technology Platform Provides the Most Flexibility

23. Almost universally stakeholders before you have supported a single technology platform to be used by both VRS users and service providers. Unlike Telus, we believe this single platform should be licensed to, or even owned by, the Administrator separately from the actual provider or providers of VRS interpreting services. This would avoid locking-in a potentially higher-cost provider and ensure reliable reporting to the Administrator.

iv. A Cap on Funding is a Must

24. While the Commission has the jurisdiction to mandate VRS and to establish a contribution fund for VRS, it must do so subject to the Policy Direction and the policy objectives set out in section 7, including the proportionality test we discussed in our written submissions. In our view, the primary effect of the proportionality test is simply to prohibit an approach that places no limit on the costs. The *Telecommunications Act* and the Policy Direction require that the funds collected to support VRS at any given time be capped at an amount the Commission has determined is proportionate to the benefits expected to be achieved.

IV. HOW TO GET GOING

25. Given what we know and what we don't know, how do we get started? Based on the Mission report, we are proposing a concrete three-phase implementation process designed to quickly and efficiently make available a full-scale, high quality VRS service in Canada. The three phases are:

Phase A Establishing the VRS Administrator: In this phase an independent VRS Administrator would be established with user groups, telecommunications service providers, and independent experts in governance and administration all having

a role. One of the first jobs of the VRS Administrator would be to run an RFP process to acquire the technology platform to be used in providing VRS. We believe this phase can be completed in 2015.

Phase B Launch VRS, Build Capacity, and Further Research: Working with Interpreter Training Programs and Agencies, in this phase the VRS Administrator oversees the roll out of VRS services to users, the expansion of the pool of interpreters to support further expansions of VRS, and additional research to improve VRS for users. What UQAM/SIVET has proposed in their submission is an example of the work that would be done in this phase. UQAM/SIVET has not proposed a separate model but rather provided a good example of exactly what Mission anticipated during this phase. We would expect to see other Interpreter Training Programs and Agencies who also participated in the development of the Mission report undertake similar proposals.

Phase C Ongoing VRS: Based on what it learns in Phase B and on responses to RFPs, in this phase the VRS Administrator would select and oversee the ongoing provider or providers of VRS in Canada.

26. Key to this approach is Commission approval between each phase. A more detailed description of these three phases is set out in the diagram provided in Appendix A, which we are happy to discuss in more detail during questioning.

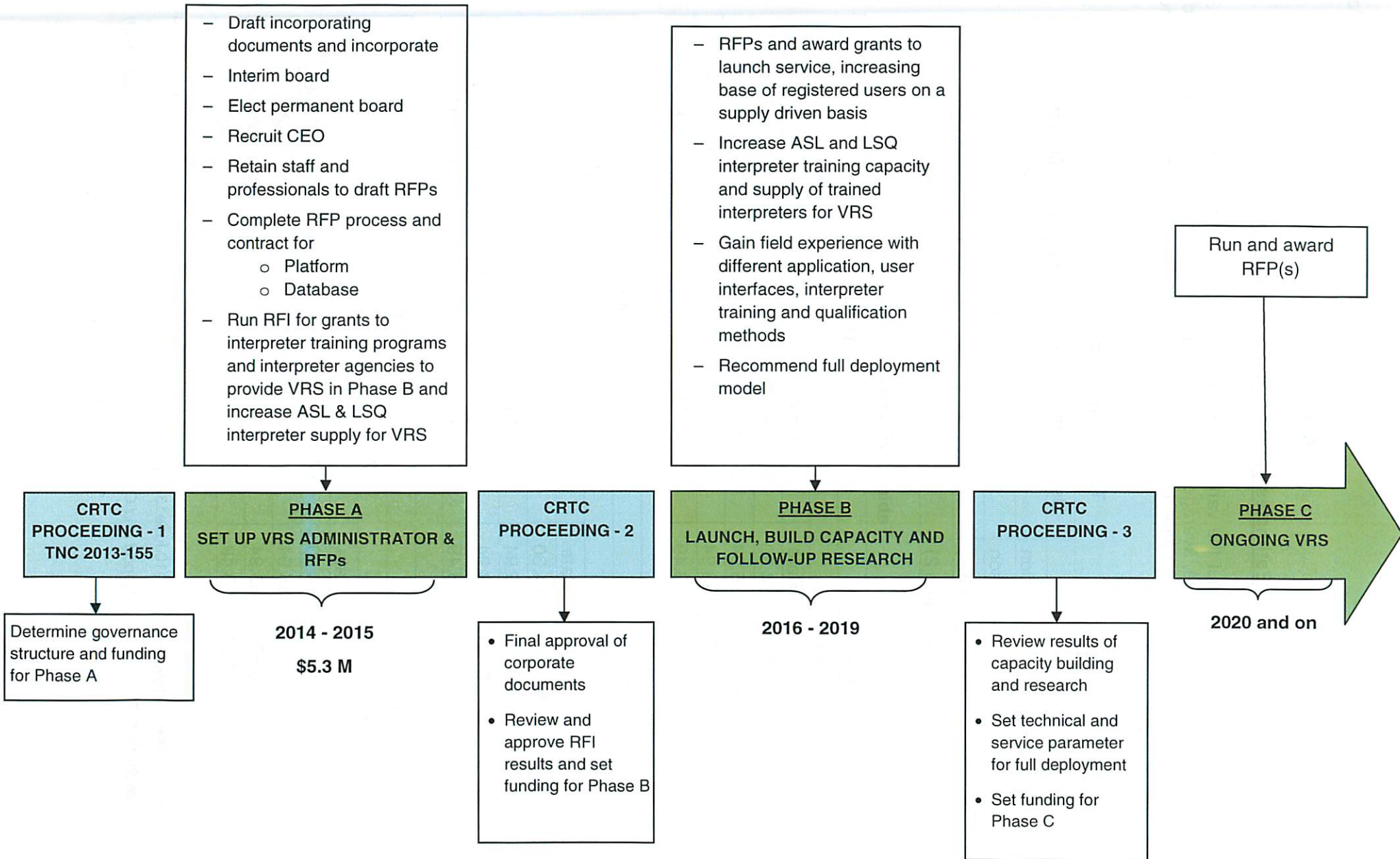
IV. CONCLUSION

27. So what can you do here and now, as an outcome of this proceeding? You can order the implementation of Phase A. Based on Mission's estimated cost of \$5.3 million, you can kickstart this process by approving in your decision funding from a central fund of \$1.0 million in 2014 and \$4.3 million in 2015 to launch Phase A.

28. We would like to thank the interpreters and technical teams for the excellent work they are doing this week – we certainly would not be able to participate effectively without you. Finally, thank you, Commissioners, for the opportunity to take part in this important proceeding. We look forward to answering your questions.

APPENDIX A

The Companies' Proposal for VRS Implementation Timeline



APPENDIX B

Estimates of VRS Full Deployment Costs

The following table sets out the variations in total costs of providing VRS based on the 3 key variables (size of user base, average minutes of use per month per user and the estimated cost of a minute of usage), as provided in the record from Mission, Sorenson, the CRTC and the FCC's recent decision.

Table 1: Input Variables

	User Base	Avg. Minutes	Rate / Minute
Mission	15,345	37	\$4.30
Sorenson	25,000	60	\$5.94
CRTC (Note1)	19,000		\$3.94
FCC (Note 2)			\$3.49

Table 2: VRS Cost Sensitivities

User Base	15,345			
Min/Month	37		60	
	Rate	Cost	Rate	Cost
Mission	\$4.30	\$29,296,674	\$4.30	\$47,508,120
Sorenson	\$5.94	\$40,470,289	\$5.94	\$65,627,496
CRTC	\$3.94	\$26,843,929	\$3.94	\$43,530,696
FCC	\$3.49	\$23,777,998	\$3.49	\$38,558,916

User Base	19,000			
Min/Month	37		60	
	Rate	Cost	Rate	Cost
Mission	\$4.30	\$36,274,800	\$4.30	\$58,824,000
Sorenson	\$5.94	\$50,109,840	\$5.94	\$81,259,200
CRTC	\$3.94	\$33,237,840	\$3.94	\$53,899,200
FCC	\$3.49	\$29,441,640	\$3.49	\$47,743,200

User Base	25,000			
Min/Month	37		60	
	Rate	Cost	Rate	Cost
Mission	\$4.30	\$47,730,000	\$4.30	\$77,400,000
Sorenson	\$5.94	\$65,934,000	\$5.94	\$106,920,000
CRTC	\$3.94	\$43,734,000	\$3.94	\$70,920,000
FCC	\$3.49	\$38,739,000	\$3.49	\$62,820,000

Note 1: CRTC 19,000 is found in Appendix B, TNC 2013-155, \$3.43 + 15% Interrogatory question to The Companies(CRTC)10June13-2 TNC 2013-155.

Note 2: FCC Tier 3 in 2017 (Report and Order and Further Notice of Proposed Rulemaking, FCC 13-82)

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