

**Before the Canadian Radio-television
and Telecommunications Commission**

Telecom Notice of Consultation CRTC 2013-155

Issues related to the feasibility of establishing a video relay service

OPENING PRESENTATION OF



23 October 2013

1. Continued effort must and should be made to improve accessibility and to enable all Canadians to communicate as effectively as possible. MTS Allstream supports measures that will provide the Deaf, Hard of Hearing, and Speech Impaired community with ways to better communicate. The challenge in this proceeding is to determine whether or not video relay service (VRS) is the most effective and efficient way to meet the needs of this community.
2. This challenge is accentuated by the fact that technology is rapidly changing the way we all communicate with one another. The ever evolving devices and applications available today, each new one more sophisticated and intuitive than its predecessor, have introduced a plethora of non-verbal forms of interactive communication – from simple texting to email to business and social media, to Twitter and even Instagram – all enabling direct communications on a personal level and communications to a wide audience.
3. The greater communications opportunities offered by technology must inform this process and should be a key factor in deciding whether to mandate (or not) VRS. When making this determination it is useful to consider carriers' experience with IP Relay service. In Manitoba, MTS Allstream has had very little up take of IP Relay service since its introduction in December 2010. Actual usage is far lower than was anticipated in the 2008 proceeding that lead to the Accessibility Policy. The policy that mandated IP Relay service for all local exchange carriers.
4. Our experience provides an indication that IP Relay service is not as effective in meeting the needs of the Deaf, Hard of Hearing and Speech impaired community as was originally anticipated. Also, and maybe more likely there are now other means that are even more effective.

5. The relative utility of VRS must also be balanced against the cost of implementation, particularly if there are other, perhaps better ways to facilitate communications for the Deaf, Hard of Hearing and Speech Impaired community.

Provision of Mandated VRS

6. Unlike TTY-based and IP Relay services, VRS requires interpreters that have a working knowledge of American Sign Language (ASL) and/or Langue des signes québécoise (LSQ). Therefore, while the interpretation for TTY-based and IP Relay services could readily be done by a telecommunications company's operator services staff, this is not the case for VRS.
7. MTS Allstream, like most telecom service providers, has neither the expertise required to define and deploy VRS, nor the skilled resources needed to administer and operate VRS on an ongoing basis. This is why we have recommended that if there is a mandate for VRS, the responsibility for deployment should reside not only with telecom carriers but also with those who have the skills and expertise to manage the service as well as with the beneficiaries of the service. This is the approach recommended in the Mission Report.
8. In the event of a mandate, we support the view expressed by the Cable Carriers – i.e., mandated VRS should be subject to oversight by an independent administrator or Board of Directors, similar to the Board that oversees the CCTS.
9. This Board, which would include telecom service providers and other stakeholders, would be responsible for vendor selection, implementation and the ongoing running of VRS. This will ensure that VRS is optimally implemented and offered in an efficient, cost effective manner.

10. If there is a decision to mandate service, we recommend a single national VRS provider with the experience and expertise to offer a quality service. In our view there is not adequate demand to accommodate the multiple “competitive” providers, suggested by Sorenson Canada, whose parent company is the leading US VRS provider. However, if a multi-provider solution is desired, we believe that the one suggested by several Accessibility groups would be more appropriate – one with multiple Canadian ASL and LSQ interpreter training programs and interpreter agencies providing service through multiple call centres located throughout Canada. Each ITP or interpreter agency would simply need to meet the same service requirements and use a common platform, to ensure that users and devices could interact between providers.
11. If VRS is mandated, one platform that warrants consideration is Skype. The submission by the Australian Communication Exchange found that the switch from its initial proprietary technology platform to Skype was beneficial to users, because of their existing familiarity with Skype. Given the use of Skype in Canada, this could be a viable technology platform for this purpose as well.
12. VRS would also bring with it the need for ongoing funding.

Funding of Mandated VRS

13. Like the Cable Carriers, our preferred form of ongoing funding is through general federal taxation revenues. Failing this our second choice would be funding through a centralized funding mechanism – specifically expansion of the existing National Contribution Fund (NCF). Collecting and disbursing VRS funding through the NCF would reduce administration costs relative to establishing an entirely new fund.

14. In this event, the base of contribution-eligible revenue needs to be expanded, to include internet revenues. Not only is VRS an internet-based service, but like wireless, internet revenues are increasing as a proportion of total telecom, while revenues from traditional local and long distance services are declining. Therefore, it only makes sense that these revenues are part of the base used to determine the contribution rate.
15. If VRS is mandated, we support a phased in approach, as proposed by many other parties. This would allow for the monitoring of demand and service levels before a full blown, national roll-out. When the service is fully rolled out, costs should be capped at around the \$30 million per year level, as recommended in the Mission Report. Although mandated VRS must be able to accommodate both ASL/English and LSQ/French, whether it should be offered on a 24/7 basis in the longer term, or not, should be determined based on a cost-benefit analysis, taking into account usage patterns during the phase in period.
16. However, given the rapid pace at which technology is changing, we believe that VRS, over even the relatively short term, may not prove to be the most efficient and effective means of meeting the communications needs of individuals in the Deaf, Hard of Hearing, and Speech Impaired community.

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