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**TELECOM NOTICE OF CONSULTATION CRTC 2013-155  
ISSUES RELATED TO THE FEASIBILITY OF ESTABLISHING  
A VIDEO RELAY SERVICE**

**AVIS DE CONSULTATION DE TÉLÉCOM CRTC 2013-155  
ENJEUX RELATIFS À LA FAISABILITÉ DE CRÉER  
UN SERVICE DE RELAIS VIDÉO**

**ORAL REMARKS OF / OBSERVATIONS ORALES DE**

**BRAGG COMMUNICATIONS INC., CARRYING ON BUSINESS AS EASTLINK  
COGECO CÂBLE INC.,  
QUÉBECOR MÉDIA INC, AU NOM DE SA FILIALE VIDÉOTRON S.E.N.C.  
ROGERS COMMUNICATIONS, AND  
SHAW COMMUNICATIONS INC.**

**(COLLECTIVELY, THE CABLE CARRIERS /  
CONJOINTEMENT, LES CABLÔDISTRIBUTEURS)**

**OCTOBER 22, 2013 / 22 OCTOBRE 2013**

*Monsieur Vice-président, Conseillers et le personnel du Conseil, bonjour.*

*Mon nom est Dennis Béland et je suis Vice-Président, Affaires réglementaires, Télécommunications chez Québecor Média. Je représente aujourd'hui les intérêts du câblodistributeur Vidéotron.*

*Representing the other Cable Carriers and appearing with me on the panel today are:*

*From Shaw Communications: Paul Cowling, Senior Director, Regulatory Affairs;*

*From Eastlink: Natalie MacDonald, Vice President, Regulatory.*

*De Cogeco Câble: Michel Messier, Directeur, Affaires réglementaires, Télécommunications;*

*From Rogers Communications: David Watt, Vice President, Regulatory Economics; and*

*Also appearing with us is Andrew Briggs, President of ABBriggs Consulting Inc.*

1. Le Conseil, dans son Avis de consultation, a sollicité des observations à l'égard du Service de relais vidéo (SRV ou VRS en anglais) et sur la façon de l'implanter s'il est accepté. Or, le SRV suscite un certain nombre de questions importantes relativement à ses coûts, son financement, son administration, les défis liés aux interprètes, la technologie, la prestation des services, la compensation pour les fournisseurs de SRV, sa faisabilité et le suivi approprié à lui donner. Les Câblodistributeurs apprécient l'opportunité de comparaître aujourd'hui devant le Conseil afin de livrer nos commentaires sur ces questions importantes.

### **Sur la possibilité de rendre le SRV obligatoire au Canada**

2. Le Conseil possède une longue feuille de route dans l'établissement de politiques visant à favoriser l'accès aux services de télécommunication pour les Canadiens sourds, malentendants ou souffrant d'un trouble de la parole. Ces politiques exigent notamment des fournisseurs de services de télécommunication (FST ou *TSP* en anglais) d'offrir l'accès aux services de relais par télécriteur (TTY) et par protocole Internet. Dans les deux cas, il est question d'un service basé uniquement sur du texte.
3. Le SRV est un troisième service de relais qui existe dans certaines autres juridictions. Ce service permet de communiquer avec un opérateur relais en utilisant le langage des signes à travers un appareil connecté à l'Internet. Les opérateurs qui fournissent un tel service ont besoin de personnel qualifié et spécialisé dans le langage gestuel. De manière générale, le SRV n'est pas fourni par les mêmes opérateurs qui fournissent les services traditionnels de relais par TTY et par protocole Internet.
4. La décision de rendre le SRV obligatoire ou non au Canada relève de la politique publique. Avant de la prendre, il est impératif d'évaluer soigneusement les coûts et bénéfices de ce service en regard de l'utilisation potentielle des ressources pour d'autres services à la population.

### **Benefits and Costs of VRS**

5. The Cable Carriers listened carefully to the various parties yesterday and understand that implementation of VRS would be beneficial for deaf, hard of hearing and speech impaired Canadians by making voice telecommunications more accessible and adding value to the communication. Parties representing the interest of potential users appearing before the Commission this week are in a much better

position to speak to the social and economical benefits of VRS than we are since they are experts in the field.

6. While the Commission sought information on the cost of providing VRS, vastly differing estimates of the annual cost of providing VRS have been placed on the record of the proceeding. This range highlights that VRS is a complex service that can be provided in a number of ways over various platforms.
7. The Mission Report provided a cost estimate of approximately \$32 million per year. This estimate includes the provision of VRS on a 24/7 basis as well as the administration costs. The Mission Report contemplates a VRS provided by independent providers chosen through a bidding process.
8. Sorenson Communications projected an annual cost of \$104 million per year by the fifth year of implementation. This does not include administration costs and is based on their own proprietary service offering.
9. The Cable Carriers submit that the range of projected VRS costs – from \$32 million to \$104 million per year to support up to 25,000 users – is concerning as it reflects a lack of consensus regarding the potential cost to offer VRS. Depending on how VRS is funded, this highlights the potential for the provision of VRS to be costly for Canadian consumers. If the Commission chooses to pay for the service through the National Contribution Fund (the NCF), TSPs would be subject to increases – 22% with a \$32 million cost, 70% with a \$104 million cost – in the revenue fee currently required to support the provision of local telephone service in high cost serving areas through the NCF.
10. The current NCF revenue is \$143 million per year and is used to subsidize the provision of local telephone service to over 615,000 residential customers in high cost serving areas.

11. We believe VRS should be offered as a social service and funded through government general tax revenues. This is an approach that is used either entirely or partially in a number of other countries. Regardless of the funding basis, we all must recognise that the service would cause real costs that must be paid.
12. If, after considering all the associated costs and benefits of VRS, the Commission is of the opinion that VRS should be mandated and funded through telecommunications revenues, our position is that funding should be handled through the NCF framework. Utilizing the existing NCF processes and procedures would enable efficient implementation of funding VRS by minimizing the duplication of reporting and collection processes and by keeping start-up administrative costs low.

#### **Appropriate Contribution Pool**

13. Some parties have argued that since VRS requires the use of an Internet connection for the delivery of service then retail Internet revenues should be included in the contribution pool of telecommunications service revenues to be used for funding of VRS.
14. The Cable Carriers oppose the expansion of the contribution pool to include Internet revenues.
15. The purpose of VRS is to provide deaf, hard-of-hearing and speech impaired communities with a service that is functionally equivalent to voice telephone service accessible by hearing persons. It enables persons to complete voice telephony calls in a manner similar to how telephone calls occur between hearing persons.
16. The existing NCF supports the provision of local telephone service in high cost serving areas. If mandated, VRS would provide a functionally equivalent service to

the deaf, hard-of-hearing and speech impaired communities. As such it would be logical and appropriate to extend the existing NCF, including its current funding formula, to fund VRS.

17. The Cable Carriers submit it would be unfair to require Internet users to contribute to the funding of VRS, which is a service designed to be functionally equivalent to voice telephony service.

### **Who Should Provide VRS**

18. VRS is a specialized language interpreter service. TSPs are not equipped to provide VRS as they do not have relevant expertise in specialized sign language training and qualifications. As a result, there is widespread agreement among the TSPs that, should the Commission mandate the provision of VRS, it should not be provided by TSPs. Instead, it should be provided by a qualified VRS provider.

19. When we look at international comparisons, it is rarely the TSP that provides VRS. Third parties who specialize in relay services are selected based on their expertise and on the service requirements and other criteria set out in a competitive bidding process.

20. Canada can gain valuable insight by looking at these processes used in other countries when introducing VRS. For example, Australia recently announced the completion of a multi-year VRS trial and the establishment of a national VRS service. Australia's VRS product uses a Skype platform which is an interface familiar to many users. Using existing and flexible platforms that are not proprietary may help to significantly reduce costs. We note that the Australian National Relay Service has a budget of AUS\$18 million per year which includes traditional MRS, IP Relay and VRS.

21. While we believe that VRS should be provided by a third party with relevant expertise, this does not mean the VRS provider should have a blank cheque. In order to best meet the needs of customers that use the service, VRS must be cost effective and flexible. To this end, we suggest that any service provider must be selected through a competitive bidding process with rigorous objective criteria.
22. We can use our knowledge of service offerings in other countries, like the one in Australia, to design VRS in Canada that is versatile enough to take into account technological advancements, flexible enough to allow for the use of multiple devices and cost effective. To do any less will run the risk of sending us down the path of inflated costs, proprietary services and potential fraud as we have seen in the US.

#### **Nul besoin d'un forfait Internet de base**

23. Dans l'avis de consultation, le Conseil a sollicité des observations sur la pertinence d'exiger un « forfait Internet de base pour le SRV » qui répondrait aux exigences minimales relatives à la vitesse de téléchargement nécessaire pour offrir un SRV fiable.
24. Sorenson Communications a indiqué que les exigences minimales relatives à la vitesse de téléchargement pour son offre de SRV sont de 256 Kbps, avec une préférence de 1.5 Mbps ou plus pour une meilleure qualité de l'image de l'interprète. Ceci est cohérent avec l'expérience de TELUS relative à son essai du SRV auquel Sorenson Communications a participé où les utilisateurs du SRV utilisaient une connexion Internet haute vitesse minimale fourni par TELUS ayant une bande passante en amont et en aval de 256 Kbps.
25. Or, selon le récent Rapport de surveillance des communications, presque tous les Canadiens ont présentement accès à un service Internet à large bande ayant une vitesse de téléchargement de 1.5 Mbps et 94% des Canadiens ont accès à la

vitesse de téléchargement cible de 5 Mbps. Les câblodistributeurs soumettent conséquemment qu'il n'est pas nécessaire de rendre obligatoire l'offre d'un « forfait Internet de base pour le SRV » puisque presque tous les forfaits d'accès Internet disponibles sur le marché répondent déjà aux exigences minimales de vitesse pour le SRV.

## **Implementation**

26. If the Commission determines that VRS should be mandated, in terms of implementation, the Cable Carriers support:

- i. Establishing a third-party administrator to oversee the implementation and management of VRS in Canada, with a balanced board of directors consisting of representatives from industry, accessibility groups and outside independent experts with a strong background in governance and administration;
- ii. A phased implementation approach to VRS, along the lines put forward in the Mission Report, including most notably an initial research phase to allow the parameters of the service to be more clearly defined and to allow a ramp-up in the availability of Canadian translators proficient in ASL and LSQ;
- iii. The use of non-proprietary technologies only, whether in terms of end-user equipment or in terms of the central platform for the provision of VRS in Canada;
- iv. The use of a first competitive bidding process to select the central technology platform provider, and a second competitive bidding process to select one or more providers of interpretation services, both processes to be overseen by third party administrator; and
- v. A Commission-approved funding cap on the provision of VRS, both in an initial research phase as well as in an eventual full deployment phase. A funding cap is a reasonable measure to ensure VRS will be deployed



efficiently and to control the risk of cost escalation beyond the level considered reasonable by interested parties and the Commission.

## **Conclusion**

27. Il est important pour les Câblodistributeurs que tous nos services de communication – y compris nos services adaptés aux besoins des personnes sourdes, malentendantes et souffrant d'un trouble de la parole – soient fournis avec efficacité et le plus efficacement possible. Le SRV, s'il est rendu obligatoire, ne doit pas faire exception.

28. Nous avons prêté une attention particulière aux observations des parties intéressées et aux rapports d'experts versés au dossier de cette instance. Nous avons également pris soin de noter les leçons apprises à l'étranger; elles seront précieuses pour le Canada.

29. Nous avons mis de l'avant plusieurs propositions qui, à notre sens, permettront au SRV, s'il est rendu obligatoire, d'être fourni de manière efficace et économiquement optimale tout en maximisant les avantages pour les Canadiens.

Thank you and we would be pleased to respond to any questions you may have.