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Mr. John Traversy
Secretary General
Canadian Radio-Television and Telecommunications Commission
Ottawa, Ontario, K1A 0N2

Dear Mr. Traversy:

Subject: **Follow-up to Decision 2014-527, the Bell Show Cause Proceeding**

In response to Bell Canada's letter to the commission dated July 17, 2015, CNIB and the Alliance for Equality of Blind Canadians (AEBC), would like to submit as part of the public record the following comments.

In the commissions Broadcasting and Telecom Regulatory Policy CRTC 2009-430 the key issues to be addressed with respect to improved accessibility to broadcasting and telecommunications issues were clearly identified. These issues are:

- Relay services (operator-assisted services that enable Canadians with hearing and speech disabilities to place and receive telephone calls).
- Emergency telecommunications services:
- Mobile wireless services:
- Customer information, service and support:

- Closed captioning (the audio component of a television program in textual form);
- Described video and audio description (an audio narrative of a television program).

While only item three is within scope for purposes of this submission, we would like to encourage the commission to continue its efforts on the other five priority areas. Identifying solutions, either through the regulatory landscape or via codes of practice will enable Canadians to better engage in Canada's rich social fabric and rapidly shifting economy.

Accessible Handsets

The Doro Claria and the Doro Liberto being proposed by Bell Canada, on the surface, appear to satisfy the conditions set out by the CRTC with regards to accessible handsets. Given that these devices are not currently available in Canada, we have not been able to conduct any user testing of the screen reader or large print functionality. We trust that when product testing begins later this year, that persons with disabilities will be adequately engaged to ensure that the device and assistive technology provide a satisfactory user experience. Unfortunately, experience has too often demonstrated that, in the absence of thorough user acceptance testing, the end result is an awkward if not frustrating experience. Given the scarcity of the deferral funds, we would like to encourage Bell Canada to take every necessary measure so that this and future offerings to Canadians with disabilities have the highest probability of success.

Provide Entry Level Access to Smart Phones

We have not been able to find hardware or operating specifications for the unit. The only information, provided on the manufacturer's website¹ is sparse and as such, we cannot state with any degree of confidence that the user experience will be positive. Should the specifications of the unit, E.G. RAM, processor speed and display resolution not be adequate, users will find the unit awkward and even perhaps sluggish to use. Assistive technology such as screen readers and large print/magnification software require additional computing resources in order to operate smoothly.

¹ <http://www.doro.co.uk/mobile-devices/smart-phones/doro-liberto-830.html>

Retrieved July 2015

In 2007 Rogers introduced a similar unit, the Nokia 6682 with a fully functioning screen reader preinstalled.² For many Canadians with vision loss, this was the first fully accessible mobile phone available through a Canadian wireless carrier. Assessing the success of the Rogers offer is well beyond the scope of this submission, however the authors can attest to a well-functioning straightforward phone. Much of the phones functionality was awkward, however text messaging and voice calls worked extremely well. The Doro products, on the surface, appear to offer a much wider suite of applications not to mention an operating system with a life span to stretch well into the future.

Customer Service/Technical Support

We would note that for users with disabilities accessing technical support can prove to be frustrating and less than satisfactory, as technical staff have no understanding of the way to describe the layout of a device to users—especially those novice users who are just making their first purchase of a handset. This situation is sometimes further complicated by additional disability conditions. To remedy this glaring, ongoing systemic barrier, we recommend that Bell establish a “Team” of specifically trained staff to provide assistance. Both Apple and Microsoft have established such teams and this model has certainly improved user access to the needed technical help. The reality is that agencies providing rehabilitation services to the visually impaired and blind in Canada do not have the trained staff or the resources to provide the needed assistance to these two phones.

Lifecycle Support

Simply put, what will Bell Canada’s customers with disabilities do in year six of their relationship with the company? Given that the deferral funds will be exhausted, will Bell merely cease to offer any accessible handsets? Bell has indicated a commitment to extend life cycle support for the Doro products and we would suggest that the commission monitor this carefully.

Accessibility APP Developer Program

We are hopeful that the developer incentives outlined in the companies submissions will result in a more robust development community with an eye to accessibility. At the same time, we would strongly encourage Bell Canada to adopt a more rigorous internal mechanism such that all apps brought to market by the carrier are put through an accessibility lens. In an ideal world, every product offered by a Canadian carrier would be usable by

² http://www.rogers.com/web/content/wireless-products/wireless_visually_impaired?cm_mmc=grdrt--all--en--visuallyimpaired

retrieved July 2015

all their customers regardless of disability. Ensuring that the company internalizes appropriate processes will move the bar one notch closer to this goal.

Procurement

We believe that Bell Canada, along with every Canadian wireless carrier, must begin to incorporate accessibility requirements while in conversations with suppliers. The views put forward by Bell Canada and some of its competitors have been that the Canadian market is not of significant size to warrant manufacturers adherence to accessibility specifications. Yet, introduction of the "21st Century Communications and Video Accessibility Act" in the United States, passed in 2010³ and the European Commission's accessibility standards announced in 2014⁴, is evidence that the market for accessible information communications technology is becoming global. Thus, as international manufacturers of mobile devices work to deliver product which complies with these legislative requirements, Canadian carriers will have more choices of which units are brought into the Canadian market. increased

In closing, CNIB and the AEBC would like to thank the commission for the opportunity to provide input into this important matter. If Canadians with disabilities are to be engaged members of a rapidly changing social, economic and technological twenty first century then it is imperative that the tools to do so are accessible for everyone.

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³ Twenty-First Century Communications and Video Accessibility Act
<https://www.fcc.gov/encyclopedia/twenty-first-century-communications-and-video-accessibility-act-0>
retrieved July 2015

⁴ New European Standard on accessibility requirements for public procurement of ICT products and services
<http://www.etsi.org/news-events/news/754-new-european-standard-on-accessibility-requirements-for-public-procurement-of-ict-products-and-services>
Retrieved July 2015

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