



Telecom Decision CRTC 2015-308

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MTS Inc. – Proposals for the use of the remaining funds in the company’s deferral account to improve access to telecommunications services for persons with disabilities

*The Commission **approves** a drawdown of \$29,000 from MTS’ deferral account to fund training for approximately 600 customer service representatives and call centre agents. This training will serve to improve these employees’ knowledge of the accessible devices and features available to persons with disabilities. The Commission also **approves** a drawdown from MTS’ deferral account of \$56,000, with this money to be allocated towards additional accessibility enhancements to MTS’ consumer-focused website that are intended to improve the usability of the website. The Commission is of the view that the approval of these two initiatives addresses the feedback from the disability community that MTS received at its Accessibility Forum in November 2014.*

The results of today’s decision will provide Canadians with disabilities with improved and more direct access to accessibility related products and services offered by MTS. In addition, with the conclusion of these two initiatives, MTS will have fulfilled its deferral account obligations with respect to improving the accessibility to telecommunications services for persons with disabilities in Manitoba.

Background

1. In Telecom Decision 2006-9, the Commission determined that a minimum of 5% of each incumbent local exchange carrier’s (ILEC) accumulated deferral account funds should focus on improving accessibility to telecommunications services for persons with disabilities.
2. In that same decision, the Commission asked the ILECs to submit to the Commission for approval proposals to dispense the funds and established the following guidelines for initiatives to improve accessibility to telecommunications services for persons with disabilities:
 - the initiative must improve accessibility to telecommunications services for persons with disabilities;
 - the ILECs must consult with advocacy organizations for persons with disabilities; and
 - drawdowns from each ILEC’s deferral account were to be applied within its own territory.

3. The Commission also stated that competitive neutrality is a principal objective set out in Telecom Decisions 2002-34 and 2002-43 (the price cap decisions), which established the deferral accounts, and should be balanced against all relevant factors when proposals are evaluated.
4. In Telecom Decision 2008-1, the Commission, among other things, determined that MTS Allstream Inc.'s proposal to improve and enhance the accessibility of the company's consumer-focused website was consistent with the guidelines established in Telecom Decision 2006-9 and approved the initiative. The remaining funds were set aside for future initiatives.
5. Then, in Telecom Decision 2014-377, the Commission approved the use of MTS Allstream's¹ deferral account funds to cover costs associated with Internet Protocol Relay implementation and website portal development to further improve the accessibility of the company's consumer-focused website (mts.ca) that provides information about the products and services it offers. In that same decision, the Commission directed MTS Inc. (MTS) to file a plan for the disposal of the remaining deferral account funds earmarked for accessibility initiatives within 60 days of the date of the decision.

Application

6. The Commission received an application from MTS, dated 16 September 2014, in which the company put forward a proposal for the disposition of \$56,600 of its remaining \$85,000 deferral account funds. Taking into account feedback received from advocacy groups that attended an Accessibility Forum it held in November 2014 (the Accessibility Forum), MTS filed an amended application on 4 February 2015 to allocate the entire remaining \$85,000.
7. MTS put forward the following proposals to dispose of the remaining \$85,000 in deferral account monies:
 - a drawdown of \$85,000 to offset the cost of \$98,600 for website enhancements to mts.ca, including the creation of responsive tables, conducting an ALT tag audit, and the creation of a single sign-on for the mts.ca website, or
 - in the alternative, a drawdown of \$56,000 to offer the company's voice mail to email (V2E) service free of charge to its customers with disabilities, and a further drawdown of \$29,000 to provide its customer service staff with sensitivity training.

¹ As of early 2012, MTS Allstream Inc. became known as two separate entities, namely, MTS Inc. and Allstream Inc. In the proceeding culminating with the issuance of Telecom Decision 2014-377, MTS Inc. and Allstream Inc. (collectively referred to in that decision as MTS Allstream) filed an application on 24 August 2012 seeking approval of their proposed initiatives to improve accessibility to telecommunications services for persons with disabilities; the application was amended on 15 March 2013.

8. MTS explained that the new proposals were as a result of recommendations it received from participants in attendance at the Accessibility Forum. The participants expressed a desire for more training for MTS store representatives on accessibility products and features, more direct access to information on accessibility devices, and a text-size feature on MTS' consumer-focused website, mts.ca.
9. The Commission received no interventions regarding MTS' application. The public record of the proceeding, which closed on 16 March 2015, is available on the Commission's website at www.crtc.gc.ca or by using the file number provided above.

Proposals to be addressed in this decision

10. In this decision, the Commission has assessed each proposal put forward by MTS on its own merit, assessing whether they meet the established guidelines set out above to improve accessibility to telecommunications services for persons with disabilities. The proposals put forward by MTS are summarized as follows:

- Sensitivity training for MTS customer service representatives and call centre agents;
- Website enhancements, including the creation of responsive tables, a site-wide audit of ALT tags, and the creation of a single sign-on for the mts.ca website; and
- The provision of V2E service free of charge to MTS' accessibility customers.

Sensitivity training for MTS customer service representatives and call centre agents

11. MTS' proposed sensitivity training would be provided to customer service representatives and call centre agents. MTS submitted that the training would cost approximately \$49 per employee, and that the deferral account drawdown would allow MTS to train nearly 600 of its employees, which would cover a large majority of their key call centre and retail location employee base.

12. The training would include the following topics and/or objectives:

- reviewing definitions of disabilities and understanding their different meanings,
- trends and demographics regarding Canadians with disabilities,
- understanding that there are various types of disabilities,
- reviewing appropriate and respectful words and terminology and discussing how perceptions affect communicating with people who have a disability,
- looking at examples of attitudinal, systemic, and physical barriers for people with disabilities, and
- allowing participants to have a heightened understanding of how to better assist/serve persons with disabilities.

Website enhancements, including the creation of responsive tables, a site-wide audit of ALT tags, and the creation of a single sign-on for the mts.ca website

Creation of responsive tables

13. MTS indicated that responsive tables are tables which automatically increase/decrease in size accordingly to display size on any accessibility device and which contain appropriate HTML markup. MTS submitted that tables on mts.ca currently require 'pinch to zoom' or scrolling to increase or decrease the table size, something that creates challenges for users who have mobility or visual impairments. MTS further submitted that with the development of proper HTML markup, screen readers will be able to assign appropriate meaning to table information by verbally announcing the column and row headers in advance of the data.²

Site-wide audit of ALT tags

14. MTS indicated that ALT tags are used by screen readers to assign verbal meaning to an image or graphic. MTS submitted that a site-wide audit would ensure that ALT tags are present and appropriate on all icons and null ALT tags are present on all decorative graphics (instructing the screen reader to skip the image). MTS submitted that currently, without ALT tags, a screen reader will recite the file name while scanning over an image, without providing any description or context for the user.

Creation of a single sign-on for the mts.ca website

15. MTS submitted that this initiative would create a single sign-on to encompass the MyAccount and the Community Forum login processes. Currently, users are required to login separately. MTS submitted that this initiative would provide easier access to the Community Forum, where users would have the ability to receive information from customer service representatives and other accessibility users who may have faced similar challenges or questions.

The provision of V2E service free of charge to MTS' accessibility customers

16. MTS' V2E service is a messaging product that allows voice mails to be forwarded to an email address of the users choosing. The body of the message contains the caller's phone number, time of message, duration of message, and call priority status. An audio file of the message is also provided as a link or an attachment to the email. MTS stated its V2E service would benefit accessibility customers who have mobility issues. Further, the ability to access voice mail via Internet portal would provide convenience to those who may have difficulty accessing their landline prior to the call being forwarded to voice mail.

² Without HTML markup, data contained within tables can pose concerns for customers using screen readers as the information is presented independent of the associated headers.

Commission's analysis and determinations

17. MTS' proposal to offer sensitivity training to its customer service representatives and call centre agents, at a cost of \$29,000, is in line with the recommendation made by participants at the Accessibility Forum
18. While MTS has submitted that it considers website enhancements to be the main theme of the recommendations made by participants at the Accessibility Forum, the Commission considers improved access to information regarding accessibility products and services to be the overarching theme of the recommendations coming out of the Accessibility Forum.
19. That being said, the Commission is satisfied that MTS' proposed website enhancements would further enhance the usability and accessibility of mts.ca for persons with disabilities, over and above previous website initiatives that used deferral account funding.³ While MTS did not provide specific evidence to show consultation on each element of the website enhancement proposal, the Commission is of the view that the proposed enhancements set forth by MTS reflect the Accessibility Forum's recommendation to increase access to information about products and services on mts.ca.
20. As MTS only provides services to its users where the deferral account funds were collected, the deferral account funds for these two initiatives would be allocated solely in MTS' own serving territory.
21. Based on the above, the Commission considers that the use of deferral account funds for sensitivity training and website enhancements, as outlined by MTS, is consistent with the guidelines set out in Telecom Decisions 2006-9 and 2008-1.
22. The Commission, however, recognizes that MTS has previously spent a significant portion of its deferral account funds on website-related initiatives. Given this, and taking into account that participants of the Accessibility Forum expressed the desire for improved information about accessible services and products that meet the needs of persons with disabilities, the Commission considers that it would be more appropriate to prioritize the allocation of deferral account funds to the training of the company's customer service representatives and call centre agents.
23. In regards to MTS' proposal to provide V2E service to its customers with disabilities free of charge with a deferral account drawdown of \$56,000, the service does not alter the format of the voice mail message prior to it being sent to the user. That is, the voice mail is sent to the user as an audio file which can be accessed via an email address of the user's choice, and does not provide an option to receive the message in an alternate format. While MTS has proposed that this service will aid customers with mobility issues, the Commission is not convinced as to how the product would

³ For example, the Commission approved the use of deferral account monies to fund website initiatives for MTS in Telecom Decisions 2008-1 and 2014-377.

provide the company's customers with disabilities with improved access to telecommunications services. Further, the Commission notes that participants at the Accessibility Forum provided no feedback when presented with the service.

24. Based on the above, the Commission considers that MTS' proposal to offer its V2E service to its customers with disabilities is inconsistent with the deferral account guidelines set forward in Telecom Decisions 2006-9 and 2008-1.

Conclusion

25. In light of all of the above, the Commission **approves** a drawdown of \$29,000 from MTS' deferral account to fund training for approximately 600 customer service representatives and call centre agents, with an expectation that the company will focus training on improving employees' knowledge of the accessibility features of the devices they carry and how to determine if the features meet the needs of persons with disabilities, as recommended by participants at the Accessibility Forum.
26. Further, the Commission **approves** a drawdown from MTS' deferral account for the remaining \$56,000, with this money to be allocated towards enhancements to MTS' consumer-focused website. In using these monies to fund website enhancements, the Commission expects the company to focus on the creation of responsive tables which would improve access to information relating to MTS' products and services for customers with disabilities, thus addressing the recommendations made by parties attending the Accessibility Forum.
27. Given MTS' descriptions of the initiatives approved in this decision, it would be reasonable to expect MTS to be able to complete these initiatives during the current fiscal year, thus depleting its deferral account fund by March 2016. As such, MTS is **directed** to file, by **31 March 2016**, a final report with the Commission detailing how the company completed the approved initiatives set out in this decision.

Secretary General

Related documents

- *MTS Inc. and Allstream Inc. – Further proposals for the use of deferral account funds to improve access to telecommunications services for persons with disabilities*, Telecom Decision CRTC 2014-377, 18 July 2014
- *Use of deferral account funds to improve access to telecommunications services for persons with disabilities and to expand broadband service to rural and remote communities*, Telecom Decision CRTC 2008-1, 17 January 2008
- *Disposition of funds in the deferral accounts*, Telecom Decision CRTC 2006-9, 16 February 2006
- *Implementation of price regulation for Télébec and TELUS Quebec*, Telecom Decision CRTC 2002-43, 31 July 2002

- *Regulatory framework for second price cap period*, Telecom Decision CRTC 2002-34, 30 May 2002, as amended by Telecom Decision CRTC 2002-34-1, 15 July 2002