# **Telecom Notice of Consultation CRTC 2021-102-1**

PDF version

Reference: 2021-102

Ottawa, 26 April 2021

Public record: 1011-NOC2021-0102

# Call for comments – Review of video relay service – Changes to procedure

Revised deadline for submission of responses from the Canadian Administrator of VRS to the request for information: 17 May 2021

Revised deadline for submission of interventions: 5 July 2021

Revised deadline for submission of replies: 30 August 2021

[Submit an intervention or view related documents]

# Background

- 1. In Telecom Notice of Consultation 2021-102 (the Notice), the Commission initiated a public proceeding to review video relay service (VRS).
- 2. The Canadian Administrator of VRS (CAV) was made party to the proceeding. The CAV was asked to respond to a number of questions set out in a request for information (RFI) letter sent separately from the Notice.

#### **Extension request**

- 3. On 22 March 2021, the CAV submitted a procedural request asking the Commission to extend the deadline to respond to the RFI from 26 April 2021 to 17 May 2021 (adding an extra 21 calendar days), and to extend the intervention deadline from 9 June 2021 to 21 June 2021 (adding an extra 12 calendar days).
- 4. In its request, the CAV submitted that it had carefully assessed the RFI and noted that some of the information requested relates to historical data and will require it to work with third-party suppliers, adding to the effort and time needed to respond.
- 5. The CAV noted that it expects to file its responses to the RFI in American Sign Language (ASL) and Langue des signes québécoise (LSQ) video formats, as well as in writing in English and French. The production of these video submissions will also require participation from the CAV management and staff resources, and will take place concurrently with the production of the written responses.



6. The CAV submitted that to have adequate time to prepare and ensure the quality of its interventions and submissions, it will require this additional time.

### **Letters of support**

- 7. On 24 March 2021, Deafness Advocacy Association Nova Scotia, Newfoundland and Labrador Association of the Deaf, and Ontario Association of the Deaf (collectively, DHH Coalition) submitted a letter to the Commission in support of the CAV's request to extend the deadlines associated with the proceeding.
- 8. In its letter, DHH Coalition submitted that a 21-day period between the CAV's response and public comments must be maintained when modifying deadlines. As such, DHH Coalition indicated that it expects the deadline for interventions to be extended to 30 June 2021, as opposed to 21 June 2021 as requested by the CAV.
- 9. DHH Coalition submitted that making parallel shifts between deadlines will allow the public to adequately and sufficiently study the CAV's responses both before and when writing its public comments.
- 10. On 30 March 2021, Canadian Association of the Deaf-Association des Sourds du Canada (CAD-ASC), Deaf Wireless Canada Consultative Committee-Comité pour les Services Sans fil des Sourds du Canada, and Canadian National Society of the Deaf-Blind [collectively, CAD-ASC et al.] also submitted a letter to the Commission in support of the CAV's request, and added that the intervention deadline should be extended to 5 July 2021 to give parties sufficient time to respond to the CAV's submission and to submit interventions.
- 11. The Commission also received letters dated 29 March 2021 supporting the submission from CAD-ASC et al. from three of its affiliates: the Alberta Association of the Deaf, the Okanagan Valley Association of the Deaf, and the Regina Association of the Deaf. The CAV replied in a letter dated 8 April 2021 that it supported the revised deadline CAD-ASC et al. proposed for interventions, and submitted that the reply period be similarly extended.

#### **Commission analysis and determination**

- 12. The Commission considers that the request from the CAV to extend the deadline to reply to the RFI by 21 calendar days is reasonable under the circumstances.
- 13. With respect to the deadlines for interventions and replies, the Commission considers that the original number of days between the receipt of the RFI responses and the filing of interventions should be maintained by extending the deadlines for filing the interventions and replies by the same amount of time. This will give interveners sufficient time to review the RFI responses and to intervene in the proceeding.
- 14. Accordingly, the Commission revises the deadlines for the filing of RFI responses, interventions, and replies as follows:

- The CAV's response to the RFI must be filed with the Commission by 17 May 2021
- Interested persons who wish to become parties to the proceeding must file interventions with the Commission by **5 July 2021**
- All parties may file replies to the interventions with the Commission by **30 August 2021**

Secretary General

## **Related document**

• Call for comments – Review of video relay services, Telecom Notice of Consultation CRTC 2021-102, 11 March 2021