



Telecom Notice of Consultation CRTC 2021-191-1

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Reference: 2021-191

Ottawa, 30 November 2021

Public record: 1011-NOC2021-0191

Call for comments – Introduction of a three-digit abbreviated dialing code for mental health crisis and suicide prevention services – Changes to procedure

Availability of sign language videos, revised intervention and reply deadlines, and changes to procedure

Revised deadline for the submission of interventions: 31 January 2022

Revised deadline for the submission of replies: 17 March 2022

1. The Commission issued *Call for comments – Introduction of a three-digit abbreviated dialing code for mental health crisis and suicide prevention services*, Telecom Notice of Consultation CRTC 2021-191, 3 June 2021 (Telecom Notice of Consultation 2021-191), in which it initiated a proceeding to (i) establish the need for the implementation of a national three-digit abbreviated dialing code (the three-digit code) for mental health crisis and suicide prevention services, (ii) identify the existing barriers to the establishment of such a code, and (iii) if necessary, determine how these barriers can be overcome.
2. On 29 August 2021, the Commission received a procedural request from the Deafness Advocacy Association Nova Scotia, the Newfoundland and Labrador Association of the Deaf, and the Ontario Association of the Deaf (collectively, the DHH [Deaf and Hard of Hearing] Coalition), to amend the procedure in the proceeding initiated by Telecom Notice of Consultation 2021-191. Specifically, the DHH Coalition requested that the Commission
 - issue Telecom Notice of Consultation 2021-191 in sign language format;
 - modify this proceeding to allow interested parties to submit their interventions and replies in sign language;
 - provide interested parties sufficient time to create videos in sign language, and ensure that all parties have the opportunity to review the transcripts of these videos; and,
 - modify the deadlines for interventions and replies to interventions accordingly.

3. The DHH Coalition submitted that this proceeding is of utmost importance to Deaf and Hard of Hearing consumers who use sign language, since mental health and self-harm tendencies are more prevalent among Deaf and Hard of Hearing individuals than among their hearing counterparts. The DHH Coalition indicated that Deaf and Hard of Hearing consumers have a vested interest in certain questions that are part of Telecom Notice of Consultation 2021-191, in particular those pertaining to video relay service (VRS) and to the ability to directly text the three-digit code. Thus, the DHH Coalition submitted that the modifications included in its procedural request will result in a fulsome public record forming a strong basis for the Commission's eventual determinations.
4. On 30 August 2021, the Commission received a letter from the Canada Deaf Grassroots Movement, which supported the DHH Coalition request.
5. The Commission recognizes that certain issues raised in Telecom Notice of Consultation 2021-191, including those pertaining to VRS calls and to the ability to directly text the three-digit code, are of particular interest for Canadians who are Deaf or Hard of Hearing. The Commission considers that adopting certain measures that would facilitate participation in this proceeding would help develop a fulsome record on these particular issues. The Commission is also mindful that significantly delaying a resolution in this proceeding could prejudice many Canadians, including persons with disabilities.
6. Accordingly, the Commission is issuing with this notice the following key information, of particular interest for Canadians who are Deaf or Hard of Hearing, in American Sign Language (ASL) and Langue des signes québécoise (LSQ):
 - paragraphs 27 to 31 of Telecom Notice of Consultation 2021-191, which relate to the functionality associated with the three-digit code;
 - the questions outlined in paragraph 34 of Telecom Notice of Consultation 2021-191; and
 - paragraphs 13 to 16 of the present notice, which provide the procedure for filing video submissions in this proceeding.
7. These videos are now available in ASL and LSQ on the Commission's YouTube channel and a link has been provided alongside the other [documents](#) for this proceeding.
8. Also, in order to provide Canadians, including those who are Deaf or Hard of Hearing, with an opportunity to present their comments on the issues under consideration in [ASL](#) or [LSQ](#), the Commission is modifying its general procedures for the purposes of this proceeding to invite parties to submit their interventions and replies in ASL or LSQ, in video format, if they so choose.

9. In addition, the Commission is providing extended intervention and reply periods to provide sufficient time for individuals and groups to create videos in ASL or LSQ and to ensure that all parties have the opportunity to review the transcripts of these videos.

Revised deadlines

10. The revised deadline for all interventions in this proceeding is **31 January 2022**. Interventions must only address the content of Telecom Notice of Consultation 2021-191, and must not address comments made as part of the interventions and replies already posted on the record of the proceeding. Any reference to these interventions or replies will be disregarded.
11. The revised deadline for replies is **17 March 2022**. Replies must respond only to interventions submitted by other parties in the proceeding, and not address comments made as part of replies already posted on the record of the proceeding. Any reference to these replies will be disregarded.
12. Submissions must be filed by sending them to the Secretary General of the Commission using **only one** of the following means:

by completing the
[\[Intervention form\]](#)

or

by mail to
CRTC, Ottawa, Ontario K1A 0N2

or

by fax to
819-994-0218

or

by ASL or LSQ video using the
[\[Intervention form\]](#)

Revised procedure for video submissions

13. The Commission will accept video interventions and replies in ASL and LSQ for this proceeding. Interested persons must provide a working link to a publicly viewable version of their video in the comments box in the “Submit an intervention” section of the Intervention form. All other submission procedures are the same as for written interventions, which are set out in the previous section of this notice.

14. The Commission will post English transcripts of ASL videos and French transcripts of LSQ videos on its website as interventions or replies on the public record of this proceeding. Links to videos will be made public when the transcripts become available. Interveners may choose to submit written transcripts with their videos to facilitate the process.
15. For videos longer than 15 minutes, a brief summary should be provided at the beginning of the video.
16. The information that parties provide to the Commission as part of this public process is entered into an unsearchable database dedicated to this specific public process. In the case of information submitted via ASL or LSQ videos, the transcripts of these videos will also be entered into the unsearchable database. This database is accessible only from the web page of this particular public process. As a result, a general search of the Commission's website with the help of either its search engine or a third-party search engine will not provide access to the information that was provided as part of this public process. However, because individuals who submit an ASL or LSQ video intervention or reply must submit a working link to a publicly viewable version of their video to the Commission, depending on where the video was uploaded, any intervention or reply submitted via ASL or LSQ video may be searchable by a third-party search engine.

Secretary General