



Telecom Regulatory Policy CRTC 2025-54

PDF version

References: 2021-102, 2021-102-1, 2021-102-2, 2021-102-3, and 2021-102-4

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Review of video relay service

Summary

Video relay service (VRS) is a basic telecommunications service that enables Sign language users and voice telephone users to communicate with each other. VRS was launched in Canada in 2016 to help empower Canadians who are Deaf and whose primary language is American Sign Language (ASL) or Langue des signes québécoise (LSQ). It provides users with more personal freedom and independence to communicate in real time with family and friends. It also helps facilitate making everyday calls and has a positive impact in the areas of employment, education, healthcare, and social connectedness.

The Commission launched a review of its VRS policy in 2021. The review addressed the structure and mandate of the Canadian Administrator of VRS (CAV), Inc. (hereafter, the CAV) to ensure that it continues to operate, maintain, and enhance VRS so that it meets the needs of its users now and into the future. Through the review, the Commission has built a robust public record that includes comments from a variety of individuals and groups, such as VRS users, the CAV, telecommunications service providers, and organizations representing the Deaf and hard of hearing community, including the Deafblind community.

Today, the Commission confirms that VRS remains a basic telecommunications service that must be made available in Canada. It has updated its VRS policy to ensure the service is more inclusive and diverse and to enhance its usability. The Commission is also giving the CAV the flexibility and resources to enhance the service to meet the ever-evolving needs of its users and to make use of advances in technology. In addition, the Commission is ensuring that the CAV continues to be transparent and accountable to the Commission and Canadians who rely on it.

The Commission's continued support for VRS builds on its work on accessibility and advances the principles of the *Accessible Canada Act* by eliminating barriers to participation in Canadian society. The Commission's support also responds to the unique needs and cultural considerations of Canadians whose primary languages are ASL and LSQ. This regulatory policy reflects the Commission's commitment to advancing reconciliation by including Indigenous peoples' perspectives and lived experiences in

VRS. The minimum requirements imposed by the Commission on the CAV are listed in Appendix 3 to this regulatory policy.

Context

1. Video relay service (VRS) is a telecommunications service that enables Sign language users and voice telephone users to communicate with each other. A VRS call involves three parties: the caller, the person receiving the call, and the video interpreter. The video interpreter relays the conversation from Sign language to spoken language and vice versa.
2. In Telecom Regulatory Policy 2014-187 (the 2014 VRS Policy), the Commission decided that VRS is a basic telecommunications service that must be offered in Canada. The Commission also decided that failure to provide VRS in Canada is unjust discrimination by Canadian carriers. Instead of requiring Canadian carriers to provide VRS, it opted for a model where VRS would be offered by an independent, centralized, third-party VRS administrator: the Canadian Administrator of VRS (CAV), Inc. (hereafter, the CAV). The CAV is funded by the Canadian telecommunications industry through the National Contribution Fund (NCF).
3. VRS launched in September 2016 across Canada with some level of service (at least 72 hours per week with some service every day) in American Sign Language (ASL) and Langue des signes québécoise (LSQ). By November 2017, VRS was operating 24 hours per day, 7 days per week.
4. In 2021, the Commission launched a review in Telecom Notice of Consultation 2021-102 to examine whether (i) VRS is meeting the needs of persons with hearing and speech disabilities whose primary language is ASL or LSQ; (ii) certain aspects of the regulatory framework need to be updated; and (iii) the CAV continues to be an effective administrator with enough funds to operate VRS.

Public record

5. The Commission made its decisions set out in this regulatory policy based on the public record of this proceeding. The public record includes comments from individual VRS users, the CAV, telecommunications service providers (TSPs), and organizations representing the Deaf and hard of hearing community, including the Deafblind community. The record also includes the CAV's responses to a request for information (RFI) and feedback received during a series of [virtual discussion sessions](#) held in January 2023.
6. In addition, the Commission put on the record of this review the results of 16 focus groups that were organized by Sage Research Corporation (Sage) in March and April 2020. [Sage's report](#) reflects the views and experiences of a sample of Canadians who are registered users of VRS in Canada.
7. The Commission also put on the record of this review a [report by Eviance](#) that contains an international comparison of how VRS is offered in different countries.

8. The following steps were taken to make this review accessible for the community who rely on VRS:
 - Telecom Notice of Consultation 2021-102 was translated into ASL and LSQ.
 - Comments were accepted in ASL and LSQ.
 - The virtual discussion sessions were held with Communication Access Realtime Translation (CART) captioning and ASL and LSQ interpretation.
9. The public record for this review can be found on the “[Closed Notices of Consultation](#)” section of the Commission’s website.

Legal framework

10. The Commission is establishing this policy using its powers under the *Telecommunications Act* (the Act) and in accordance with the 2023 Policy Direction.¹ The Commission must also act in a manner that is consistent with the *Canadian Charter of Rights and Freedoms*. Although the Commission is exercising its powers under the Act, the complementary objective and principles of the *Accessible Canada Act* inform the Commission’s work.
11. The Commission is also committed to advancing reconciliation with Indigenous peoples in Canada. The *Accessible Canada Act* recognizes Indigenous Sign languages (ISLs) as one of three primary languages for communication by Deaf persons in Canada. The Commission also recognizes that a stated purpose of the *Indigenous Languages Act* is to support and promote the use of Indigenous languages, including ISLs.
12. For a detailed explanation of the legal framework, see Appendix 1 to this regulatory policy.

Status of VRS as a basic telecommunications service

13. In the 2014 VRS Policy, the Commission considered that VRS is a basic telecommunications service. The record of this review confirms that VRS continues to allow its users to initiate and receive calls in a way that is equivalent and comparable to basic telephone service.
14. The Commission therefore confirms that VRS is a basic telecommunications service that must continue to be made available in Canada.

¹ *Order Issuing a Direction to the CRTC on a Renewed Approach to Telecommunications Policy*, SOR/2023-23, 10 February 2023.

An impactful service for VRS users

15. In establishing the VRS Policy, the Commission determined that creating a service that responded to the unique needs and cultural considerations of Canadians with hearing and speech disabilities whose primary language is ASL or LSQ would allow for the development of capacity within Canada. VRS in Canada is a Canadian service that employs Canadian video interpreters² and is administered by the CAV, which is largely staffed by Canadians who are Sign language users and who are Deaf.
16. The CAV has shown that it is responsive to the needs of its users and has continued to enhance and evolve its processes and features offered in VRS. The CAV has proactively announced that it will be conducting feasibility studies for issues raised on the record of this review. The CAV also recently launched consumer consultation panels³ “to provide a place for dialogue between the CAV and Deaf VRS users to gather constructive feedback and contribute to the continuous improvement of the Canadian VRS.” Many of the participants of those CAV consumer consultation panels submitted interventions in this review and participated in the virtual discussion sessions.
17. The CAV’s work has been noticed and appreciated by VRS users. There is overwhelming support for VRS on the record of this review. Individual VRS users and organizations representing VRS users told the Commission about the importance of VRS in their lives.
18. As noted in the joint reply submitted by the Canada Deaf-Blind Collective for VRS and the Deaf Wireless Canada Committee for VRS, several Deaf and hard of hearing (DHH) groups⁴ and the CAV all described the significant positive impact of the launch of VRS in Canada, describing “a whole new world opened up, creating the independence and empowerment of DDBHH [Deaf, Deafblind, and hard of hearing] Sign language users with telecommunications accessibility connections in Canada. VRS users can use their primary language of ASL or LSQ as recognized by the *Accessible Canada Act*.”
19. Similarly, the Fondation des Sourds du Québec stated that “VRS has a very positive impact on equal accessibility and enables people who are Deaf to develop autonomy. Since the launch of VRS, the number of applications that make it easier

² As of January 2022, all video interpreter providers are located in Canada.

³ The panels are based on nominations put forth by Deaf and hard of hearing stakeholder groups. There are 10 panel members (7 ASL and 3 LSQ).

⁴ These groups are the Canada Deaf Grassroots Movement (CDGM), Canadian Association of Sign Language Interpreters (CASLI), Canadian Association of the Deaf – Association des Sourds du Canada (CAD-ASC), Canada Deaf-Blind Collective (CDBC.VRS), Deaf and Hard of Hearing Coalition (DHH Coalition), Deaf Wireless Canada Committee (DWCC), and Ontario Video Relay Services Committee (OVRSC).

to use has greatly improved [...]” [Translation]. This was a key finding in the focus group study conducted by Sage where “all participants said that VRS is a very important service and often used the word ‘independence’ to summarize the value of the service.”

Issues

20. The Commission has considered all the comments made during this proceeding, including the transcripts of the virtual discussion sessions, the RFI responses from the CAV, Sage’s report, and the report from Eviance. After reviewing the comments, the Commission has identified the following issues to be addressed in this regulatory policy:

- Usability – Issues identified by users
 - VRS enhancements
- Enhancing inclusivity and diversity
 - The CAV’s mandate
 - The CAV’s board of directors
- Flexibility and resources
 - Single, independent, centralized third-party VRS administrator model, VRS platform, and contract durations
 - Funding cap
 - Budget process
- Transparency and accountability
 - Budget process – Enhancing the annual report submission and aligning filing dates
 - Quality-of-service metrics, including outages and standards
 - Emergency services (9-1-1 and 9-8-8)
 - Awareness, outreach, and promotion of VRS
- Timing of the next VRS review

21. In Telecom Notice of Consultation 2021-102, the Commission identified issues that were out of scope of this review. In addition, some issues were raised on the public record that were also outside the scope of this review and will not be addressed by

the Commission in this regulatory policy. This includes matters that have already been addressed by the Commission through existing regulatory proceedings and issues that are outside the scope of the Commission's jurisdiction. A list of out-of-scope issues can be found in Appendix 2 to this regulatory policy.

22. The minimum requirements imposed by the Commission on the CAV are listed in Appendix 3 to this regulatory policy.

Usability – Issues identified by users

VRS enhancements

23. The Commission set out the original minimum requirements for VRS based on comments from organizations representing Canadians who are Deaf, individuals, interpreter organizations, and TSPs. The minimum requirements set out the necessary features and attributes of a VRS service.
24. The CAV has consistently met these requirements and submitted that since 2017, it has conducted detailed surveys of VRS users to assess their satisfaction with the VRS user experience. Users have consistently expressed high levels of satisfaction with the service.
25. One of the objectives of this review is to examine whether certain aspects of VRS require modifications or improvements. The Commission notes that various suggestions for improving and enhancing the service were raised on the public record.
26. The Commission finds that it is only necessary to update the minimum requirements to either (i) ensure that the functionality, features, and services that are provided as part of VRS are sufficient so that users do not experience barriers when conducting telephone calls; or (ii) update details to bring them up to date with the current state of VRS.
27. See Appendix 4 to this regulatory policy for a list of features that were raised on the public record and that are already being offered by the CAV.

Enhancing call notifications for Mac and PC users

28. Some comments on the public record indicated that there is no way for VRS users to know that they have an incoming call when they use a computer for VRS. This often leads to unanswered and missed incoming calls.
29. The Commission acknowledges the importance of call notifications regardless of the platform used. Therefore, the Commission is updating the minimum requirements to include a provision regarding incoming call notifications.
30. The Commission is aware that the CAV has already entered into an agreement with Embrava to develop and sell a compatible notification device for VRS users

accessing the service using a Mac or PC. This third-party product called Embrava Blynclight provides a visual alert of an incoming call by flashing or displaying a light.

31. Given that the Commission is including the provision of call notifications as a minimum requirement, the Commission expects the CAV to provide one Embrava Blynclight to each user, upon request, at no charge.

Updating the minimum requirements to reflect features already being offered

32. The Commission acknowledges that the CAV has been providing caller identification (ID) blocking,⁵ Hearing Carry Over, and Voice Carry Over functionalities since the launch of VRS. Therefore, the Commission is updating the minimum requirements to ensure that these features continue to be provided (see Appendix 3 to this regulatory policy).

Suggested enhancements not being adopted

33. Other suggestions made on the public record included:
- permitting the use of VRS as a video remote interpretation service;
 - allowing Sign language users who are not Deaf or hard of hearing or who have a speech disability (such as family members or friends) to be eligible to have a VRS number so that they can make point-to-point calls⁶ with VRS users;
 - recording VRS calls;
 - eliminating transfers between video interpreters; and
 - establishing an ombuds for handling complaints.
34. These suggestions are not being adopted for the reasons explained in Appendix 5 to this regulatory policy.

Enhancing inclusivity and diversity

The CAV's mandate

Appropriateness of the CAV's mandate

35. In the Commission's view, the CAV's overall mandate continues to be appropriate, and only minor changes are necessary to make the language of the mandate more inclusive.

⁵ Users can choose to hide their caller ID for all calls or on a per-call basis.

⁶ A point-to-point call is a VRS call between two VRS users without a video interpreter.

36. In addition, the CAV's mandate, as currently set out, is inclusive of anyone who is Deaf, hard of hearing, or who has a speech disability and who uses ASL or LSQ, including Indigenous peoples who are Deaf and people who are Deafblind with sufficient vision to see a video interpreter. However, the Commission understands that reflecting inclusion, diversity, and intersectionality language in the CAV's mandate would advance the Commission's inclusion and diversity objectives. Therefore, the Commission requires that the mandate include language in this regard similar to the principle stated in paragraph 6(e) of the *Accessible Canada Act*.
37. The Commission finds that the mandate needs to be updated to make it more inclusive and consistent with the approach taken in the *Accessible Canada Act*. Specifically, these updates to the mandate include:
- providing in an efficient manner a national VRS in Canada, both in ASL and LSQ;
 - providing telecommunications services, in a manner that is consistent with the Commission's determinations, to all individuals who use ASL or LSQ as their primary language of communication due to a disability;
 - promoting public awareness and education about VRS;
 - considering, where possible, the different ways that persons with disabilities interact with their environments and the multiple and intersecting forms of marginalization and discrimination faced by persons with disabilities; and
 - taking any action needed to further the above.
38. In light of the above, the Commission requires the CAV to update its relevant documentation to be consistent with the revised mandate and update its by-laws by changing the definition of "Deaf and hard of hearing" to "all individuals who use ASL or LSQ as their primary language of communication due to a disability."

Indigenous Sign languages

39. The DWCC indicated that Indigenous peoples who are Deaf have the right to request ISL interpreters. The Commission acknowledges that Indigenous peoples who are Deaf should have the opportunity to communicate using an ISL. However, the public record lacked key information in this regard, and there is a need to gather additional information for this to become a reality.⁷

⁷ ISL is not a single language. It refers to several unique ISLs used in Canada (for example, Oneida Sign Language, Inuit Sign Language, and Plains Sign Language). It is not clear (i) how many people rely on one ISL as a primary method of communicating, as opposed to ASL or LSQ; (ii) how many interpreters can sign in one of the ISLs, and if so, which ISL; and, consequently, (iii) whether it would be feasible for VRS to offer interpretation in any of the ISLs on a consistent basis.

40. Due to the importance of this issue, the Commission intends to launch a future proceeding to gain a better understanding of the ISLs that are used in Canada, how many people rely on an ISL, and the current availability of interpreters of ISLs. The Commission considers that this will give it the information it needs to assess how it can promote and support the use of ISLs in VRS.
41. The Commission acknowledges that aside from the potential inclusion of ISLs in VRS, current or potential VRS users who self-identify as Indigenous and who use ASL or LSQ as their primary language to communicate may have specific needs for VRS of which the CAV may be unaware. These needs include, but are not limited to, cultural sensitivity training for CAV staff and contractors and the use of culturally appropriate signs.
42. Therefore, the Commission requires the CAV to consult with current and potential VRS users who self-identify as Indigenous and who use ASL or LSQ as their primary language to communicate to understand their specific needs and how VRS could be enhanced to meet those needs. The Commission is not setting the timelines for these consultations. Rather, the timelines and the nature of the consultations must be developed in collaboration between Indigenous users, potential Indigenous users, and the CAV.
43. The CAV is required to provide in its annual report an update on these consultations and the steps it has implemented or plans to implement to better serve Indigenous peoples whose primary language is ASL or LSQ.
44. Moreover, to further enhance its understanding of issues relevant to Indigenous peoples—for example, their specific needs and how VRS could be enhanced to meet them—the Commission encourages the CAV to continue to participate in conferences such as the [National Indigenous Deaf Cultural Gathering](#).

Addition of Deafblind users to the mandate

45. The Commission recognizes that Deafblindness is a distinct disability. Like all disabilities, it is on a spectrum, and people who are Deafblind have varying levels of vision and/or hearing. VRS users must have sufficient vision to see a video interpreter.
46. The Commission notes that some Deafblind users have sufficient vision to use VRS. According to the CAV, approximately 12% of VRS account holders in Canada identify as Deafblind. These users have consistently indicated very high levels of satisfaction with VRS in the CAV's annual customer satisfaction surveys.
47. There were some comments on the public record asking that the accessibility of VRS for Deafblind users be enhanced.
48. The Commission notes that the CAV has hired an entity comprised of Deaf and Deafblind experts to conduct a feasibility study to better understand the needs of people who are Deafblind or have low vision and to assess possible improvements to

VRS. The Commission requires the CAV to complete its study and to file its findings and its plans with the Commission in English, French, ASL, and LSQ within **one year** of the publication date of this regulatory policy.

49. The Commission acknowledges, however, that there are Deafblind users whose vision is not sufficient to see a video interpreter. People from the Deafblind community with low to no vision currently often rely on text and braille keyboards or displays to communicate. To serve these individuals, a fundamentally different service would be required. While VRS is a video-based service, this would require a video- and text-based service. Establishing such a service would require a separate proceeding.

Other comments related to the CAV's mandate

50. Some members of the DHH community submitted that Sign language users without a disability should be eligible for a VRS number. They acknowledged that there are ways other than VRS for VRS users to connect with hearing Sign language users (such as FaceTime, Facebook Messenger, Marco Polo, and Zoom). They submitted that these options could be data-intensive if used over mobile devices but added that some wireless service providers zero-rate VRS.⁸ They indicated that point-to-point calls with hearing Sign language users would also free up video interpreter resources.
51. In the Commission's view, the policy of not allowing persons without disabilities to be assigned a VRS number should remain in place. It should remain in place because VRS was established in Canada to remove barriers that Sign language users with disabilities faced when trying to access basic telecommunications services. Sign language users without disabilities do not face these barriers. These two groups can communicate over telecommunications networks either via a VRS call with a video interpreter or using video conferencing platforms.
52. Furthermore, the impacts of assigning VRS numbers to persons without disabilities are unknown. As the CAV noted, this practice could cause an increase in demand for telephone number resources and customer support services, which in turn could increase costs or limit availability for those in greatest need.

The CAV's board of directors

Board of directors' structure

53. Some comments indicated that TSPs have a conflict of interest and should not have a right to vote on the CAV's board of directors. The Commission notes that similar comments were made on the record of the proceeding that resulted in Telecom Regulatory Policy 2014-659.

⁸ Zero-rating pricing can happen when an Internet provider exempts data from a particular application from a monthly mobile data plan.

54. In paragraphs 59 to 67 of Telecom Regulatory Policy 2014-659, the Commission required the CAV's board of directors to be elected by its members, who are elected or selected by registered stakeholders.⁹ The board is composed of seven members:
- three directors selected through the DHH stakeholder processes;
 - two directors selected through TSP stakeholder processes; and
 - two independent directors selected by the entire board.
55. Of the directors elected by DHH stakeholders, one is elected from ASL stakeholders and one, from LSQ stakeholders. The ASL and LSQ directors then select the third DHH director from all DHH stakeholders collectively.
56. Based on the public record of this review, the Commission's approach in Telecom Regulatory Policy 2014-659 with respect to TSP representation on the board of directors remains correct and does not require any changes. The Commission therefore considers that the current level of TSP participation on the CAV's board of directors should be maintained.
57. As part of its review, the Commission asked questions about stakeholder registration, the director selection process, and directors' compensation. Based on the information filed on the record, the Commission finds that stakeholder registration, the director selection process, and director compensation remain appropriate without changes.

Indigenous and Deafblind representation

58. In the Commission's view, having representation from Indigenous and Deafblind communities on the CAV's board of directors is appropriate. It promotes inclusion, diversity, and advances reconciliation with Indigenous peoples in Canada. It also ensures that the CAV considers the perspectives and lived experiences of Indigenous and Deafblind communities.
59. In addition to requiring the CAV to consult with Indigenous and Deafblind communities, as discussed in "The CAV's mandate" section above, the Commission requires the CAV to add two new non-voting positions to the CAV's board of directors: one to be elected by registered Indigenous stakeholders to represent Indigenous communities and one to be elected by registered Deafblind stakeholders to represent Deafblind communities. The Commission expects that those two new non-voting positions will be modelled after the two permanent invitees who represent Sign language interpreters. The selection process should be the same as for other board members.

⁹ Language interpretation stakeholders cannot be members or directors because this is widely viewed as a conflict of interest, but they bring their expertise as permanent invitees. Interpreter stakeholders elect two permanent invitees: one for ASL and one for LSQ.

60. The Commission expects the CAV to amend its by-laws to reflect the change described in the paragraph above. The Commission also expects the CAV to make all public information related to its governance available on its website in accessible formats, including formats that can be read by the tools used by people who are Deafblind.
61. Although the two new positions will initially be non-voting positions, the Commission considers that they should eventually become voting positions. However, as set out in the 2014 VRS Policy, the board of directors was designed to ensure that no constituency has a veto. In the Commission's view, this remains important.
62. Given that it is not clear how adding new voting positions could affect the dynamic of the board, the Commission requires the CAV to conduct a study on how the board of directors could be modified to include voting positions for Indigenous and Deafblind board members while maintaining the balance of the board. The CAV must file the findings of its study with the Commission within **one year** of the publication date of this regulatory policy. The Commission may launch a public consultation on this matter based on the findings of that study.
63. The CAV must also submit to the Commission for its information, within **six months** of the publication date of this regulatory policy, amended by-laws creating two new stakeholder groups and setting out the framework for the participation of these representatives in the CAV's governance, including:
 - eligibility requirements for the two additional stakeholder groups;
 - incorporation of these two stakeholder groups into the registration process; and
 - when and how these representatives would contribute to the board's committees if the board deems it appropriate.

Flexibility and resources

Single, independent, centralized third-party VRS administrator model, VRS platform, and contract durations

64. As part of this review, the Commission asked if the market conditions have changed since 2014 to allow for a competitive framework for the delivery of VRS.
65. The public record included requests for a competitive model to be introduced but no evidence on how this could be achieved in the current market conditions.
66. The Commission considers that the centralized model, in which VRS is provided nationally by an independent administrator, remains appropriate.

The CAV's planned research of VRS technology

67. In its final reply, the CAV acknowledged that some parties submitted during this review that the VRS platform should be replaced. It added that the current platform was selected in 2015 following a rigorous assessment conducted on a global basis. The CAV submitted that it considered the distinctive characteristics of the Canadian marketplace in this assessment. It ensured that it met service requirements set out in the 2014 VRS Policy and in Telecom Regulatory Policy 2014-659, in which the Commission set out the structure and mandate of the VRS administrator. The CAV added, however, that marketplace and service demand characteristics have evolved since VRS was launched in Canada.
68. The CAV noted that its contract with the VRS platform provider will end soon. The CAV added that in 2024, it will conduct an RFI process that will allow it to refine and update its understanding of the state of VRS technology, of supplier and product availability in Canada's marketplace, and of suppliers' current and upcoming service capabilities.
69. The CAV added that it will include the assessment of some of the suggested features made by VRS users during this review in its planned research on the state of VRS technology available in Canada.
70. The CAV is expected to include system uptime and outages in its investigation of the current state of VRS platforms, including approaches to eliminate daily restarts and reduce planned outages.
71. The outcome of the RFI process will be used to inform the CAV's next steps regarding a potential request for proposals process for the VRS platform.
72. In the Commission's view, it is clear the CAV is responding to the comments on the record from some VRS users about their lived experience with the platform and what additional features and enhancements could improve that experience.
73. The Commission requires the CAV to conduct the RFI process, as it committed, and requires the CAV to file with the Commission its findings and conclusions on whether it is necessary for the CAV to launch a competitive process for a new platform vendor within **two years** of the publication date of this regulatory policy.

Contract duration limit – contract with platform provider

74. The 2014 VRS Policy limits the duration of the contract that the CAV can establish with a provider to four years with an option to extend it. This limitation was put in place to allow the administrator to adapt how VRS is provided considering any Commission requirements resulting from a review. The Commission notes that in Telecom Decision 2022-340, the Commission approved the CAV's request for an additional four-year extension for its contracts with suppliers from the dates that the contracts expire.

75. In light of the CAV's plans to conduct an RFI process and potentially to conduct a request for proposals process, the Commission is maintaining a limit on the contract duration for the CAV's contract with the platform provider. However, the Commission considers there is merit in modifying the contract term length to five years with the option for an extension. This would give the CAV additional flexibility.

Contract duration limit – contract with video interpreter provider

76. In the 2014 VRS Policy, the Commission acknowledged the Sign language interpreter shortage. That shortage has not improved, and the introduction of the *Accessible Canada Act* in 2019 created an even stronger demand for such services in the delivery of other government and federally regulated services.

77. The CAV requested relief from the contract duration limits for video interpreter providers. The CAV stated that removing the duration limit on its contracts would allow it to foster long-term relationships with its video interpreter providers as long as they continue to meet high standards for delivering interpretation services.

78. In addition, the CAV noted that the expiration of the video interpreter providers and platform contracts within the same time frame can be burdensome and could negatively impact the CAV and the delivery of VRS.

79. No parties to this proceeding objected to the CAV's requested relief.

80. The Commission considers the CAV's rationale to be reasonable, particularly considering the Sign language interpreter shortage. Accordingly, the Commission removes the requirement to have contract duration limits for contracts for video interpreter providers. The CAV may, however, impose contract duration limits where it finds them appropriate.

81. The Commission encourages the CAV to include the needs and feedback of users when reviewing and updating its video interpreter policies. These needs and feedback should be reflected in the contracts with the video interpreters.

Funding cap

82. Some comments on the public record discussed what, if any, changes should be made to the annual funding cap, including eliminating the funding cap completely.

83. In the Commission's view, it is important for the TSPs that fund the service to have predictable costs. Therefore, the Commission is maintaining an annual funding cap.

84. The CAV, DHH groups, and TSPs made different proposals on the public record about how much the funding cap should be increased.

85. In the Commission's view, the CAV, as the administrator of VRS, has the best insight into the costs of running, maintaining, and upgrading the service; the likely usage trends; and the planned launch of new features.
86. The CAV has consistently demonstrated that it is a responsible and competent administrator and that it has consistently requested the appropriate amount of funding needed to develop, operate, and enhance the service.
87. Since the launch of VRS, the CAV has used its budget to enhance the service to operate 24 hours per day, 7 days per week, a milestone it reached in its second year, and add other features beyond the minimum requirements, such as access to 9-8-8.¹⁰
88. In light of the above, the Commission is increasing the annual funding cap from \$30 million to \$41 million, as proposed by the CAV.

Increases to the annual funding cap under exceptional circumstances

89. The Commission acknowledges that there could be exceptional circumstances where the CAV may need funding above the funding cap. In those circumstances, the CAV would need to submit a Part 1 application pursuant to the *Canadian Radio-Television and Telecommunications Commission Rules of Practice and Procedure* (Rules of Procedure), requesting an exception to the \$41-million cap with an explanation why the exception is justified and reasonable. That Part 1 application would be posted for public comment and the Commission would need to publish a decision for the funds to be released.

Service-related costs and administrative costs without distinction

90. In the 2014 VRS Policy, the Commission decided that the funding cap is to cover all administrative and service-related costs for VRS in both ASL and LSQ. The Commission did not distinguish between administrative and service-related costs to encourage the VRS administrator to be innovative in its approach to implementing VRS. This may involve a more hands-on role for the administrator.
91. In the Commission's view, the funding cap should continue to cover all administrative and service-related costs for providing the VRS service without distinguishing between these costs.

Budget process

92. In the 2014 VRS Policy, the Commission required TSPs to contribute to the NCF to pay for VRS. There is evidence on the record that the Commission's 2014 regulatory approach with respect to TSPs and the NCF remains appropriate. The NCF continues

¹⁰ Canadians can call or text 9-8-8 to access bilingual, trauma-informed, and culturally appropriate mental health and suicide prevention support. The service is free and can be accessed 24 hours per day, 7 days per week, 365 days per year.

to be the most effective and appropriate mechanism for financing VRS. As a result, VRS will continue to be funded using the NCF.

Introducing a new funding request process

93. As set out in the 2014 VRS Policy, the CAV currently files a Part 1 application pursuant to the Rules of Procedure for funding. That Part 1 application must receive Commission approval before the CAV can receive its funding. After almost a decade of processing these applications, the Commission considers that the process should be changed to make it more efficient, accessible, and transparent.
94. Going forward, the CAV is required, no later than **August 31** each year, to file with the Commission a letter addressed to the Secretary General that:
 - is in English, French, ASL, and LSQ;
 - specifies the funds needed for the following year (not exceeding the funding cap);
 - includes an affidavit from the CAV's chief executive officer that lists all the minimum requirements and that attests they have all been met;
 - provides a link to the CAV's annual report, which will contain detailed information regarding
 - users and calls;
 - expenditures;
 - quality-of-service metrics;
 - outages;
 - the CAV's outreach and education plan;
 - the CAV's roadmap outlining its planned service evolution; and
 - consultations.
95. This letter will be posted on the Commission's website and must also be available in English, French, ASL, and LSQ on the CAV's website.
96. The process described above will provide the Commission with the information it needs for its annual decision that provides direction to the NCF. This new process will also continue to provide cost predictability to the TSPs that fund the NCF.
97. This new process will enhance transparency and accessibility of information while removing the regulatory burden associated with a Part 1 application process. If the CAV meets all the minimum requirements, which are set out in this regulatory

policy, there is minimal benefit associated with a Part 1 application process for a budget request. This is because the Commission does not regulate how the CAV allocates its budget.

98. Furthermore, the goal of the Part 1 application process was not clear to all stakeholders. The key outcome of this process has always been for the CAV to request that a specific amount of funds be released from the NCF. This same outcome can now be achieved more efficiently and with less confusion. This new process will also give the CAV the time it needs to verify the information it uses to forecast its budgetary needs for the upcoming year. This will make the CAV's forecasts for funding more accurate.
99. Although there was support for the continued use of the Part 1 application process, the Commission considers that the above change is required to make the funding request process more efficient, accessible, and transparent.

Filing Part 1 applications when failing to meet the minimum requirements

100. If the CAV is unable to meet any minimum requirement set out in this regulatory policy, it must file with the Commission a Part 1 application pursuant to the Rules of Procedure to seek funding. The Commission will post that application for public comment. The Part 1 application process will ensure that the CAV remains accountable to its users and the Commission.

Transparency and accountability

Budget process – Enhancing the annual report submission and aligning filing dates

101. The CAV publishes its annual report and audited financial statements on its website and files them with the Commission each June. This is consistent with Telecom Regulatory Policy 2014-659, in which the Commission put these measures in place for transparency and accountability purposes.
102. The annual Part 1 application filed by the CAV pursuant to the Rules of Procedure contains more detailed financial figures and forecasts. This is consistent with Telecom Regulatory Policy 2014-659 and is an additional transparency and accountability measure. However, because of the change to the funding request process, the information that typically would have been filed with the Part 1 application will no longer be available.
103. Therefore, the Commission requires the CAV to include the following information in its annual report going forward:
 - the percentage of calls handled in French/LSQ versus English/ASL during the first two quarters of the current year;
 - the average minutes per month of usage during the first two quarters of the current year per registered user and active user;

- the percentage of registered users that do not make any calls in a given quarter; and
 - forecast expenditures for the upcoming year, reconciled with actual expenditures for the past year, broken down by operations, wages, professional services, general administration, marketing and public relations, and board expenses.
104. This reporting requirement will ensure that the Commission and all parties continue to have access to this detailed information. It will also ensure that the CAV remains accountable and transparent.
105. The Commission is also changing the date by which the CAV is required to file its annual report to August 31. This will align with the deadline for the CAV's funding request and should make it easier for the CAV to make more accurate forecasts for the upcoming year.
106. To further enhance transparency, the Commission requires the CAV to publish a summary of its annual report on its website in ASL and LSQ by **August 31** of each year.

Quality-of-service metrics, including outages and standards

107. The CAV collects information on several metrics, namely its quality-of-service and performance metrics as well as video interpreter standards and other standards. Those metrics and standards provide the tools that the CAV needs to measure and ensure the quality of VRS. They also ensure that the CAV remains transparent and accountable. The Commission therefore finds that the quality-of-service metrics established by the CAV, namely system uptime, speed of answer, average wait time, and abandon rate, as modified by the Commission, are appropriate.
108. The Commission expects the CAV to continue to meet or exceed the quality-of-service metrics.
109. The public record of this review contains comments related to the CAV's speed of answer, average wait times and abandoned calls, and uptime metrics, including outages. It also contains comments on the CAV's video interpreter standards.

Speed of answer

110. Currently, the CAV's speed-of-answer metric is that 80% of calls should be answered within 120 seconds, measured monthly. This is consistent with the practices of the VRS provider industry.
111. There are suggestions on the public record of this review that the CAV should raise its target for the speed of answer metric to 90% of calls within 90 seconds or instantly. However, no details were provided on how this could be achieved.

112. According to the CAV, it has surpassed its target for the speed of answer metric for most months, regularly answering more than 90% of calls within 120 seconds.
113. The Commission acknowledges that the interpreter shortage negatively impacts the CAV's ability to improve this metric more than what it is already achieving. However, the Commission notes, as reported by the CAV in its annual report on its website and in response to RFIs, that it is now regularly answering more than 90% of calls within 120 seconds. This represents an enhancement of the VRS user experience.
114. In light of the above, the Commission requires the CAV to change the metric for speed of answer from 80% to 90% of calls being answered within 120 seconds. This will reflect the current level of service that is being experienced by users.

Average wait times and abandoned calls

115. Currently, the CAV's metric establishes that the average time a user waits for their call to be answered by a video interpreter should be 30 seconds or less. Although there were some anecdotal statements about longer wait times on the record, they did not give a sense of when these wait times occurred. Other comments noted the CAV's efforts to reduce wait times following increased wait times due to the COVID-19 pandemic.
116. In its reply, the CAV submitted that in 2022, over 70% of calls were answered in 15 seconds. In addition, customer surveys conducted by the CAV indicate that over 80% of users find wait times to be excellent or good.
117. The CAV explained that LSQ service presents some challenges in achieving the goal in parity with ASL because LSQ call traffic is more concentrated in one time zone. As a result, any surges during the day create more of a queue.
118. With the expansion of LSQ call centres and the addition of more video interpreters, which is coinciding with the continued growth in volume of calls, the CAV believes it will be able to consistently achieve the goal of an average wait time of 30 seconds for both languages.
119. The Commission acknowledges that the interpreter shortage negatively impacts the CAV's ability to improve this metric more than what it is already achieving. In this instance, the Commission has decided that it is not appropriate to raise the CAV's target for average wait times.
120. The Commission notes, however, that the average wait time measured by the CAV does not include callers who abandon their calls. Therefore, the average wait time metric may not fully reflect the VRS user experience and the amount of time users actually spend waiting for their call to be answered by a video interpreter.
121. To have a more accurate measure of the VRS user experience, the Commission requires the CAV to collect and include in its annual report the average wait time for

abandoned calls as a standalone metric. This metric is to be measured from the time a call enters the system until it is abandoned. This metric is in addition to the other metrics that the CAV is required to collect and report on.

Uptime

122. Uptime is a measure of the availability of the VRS platform free from system-wide outages. The CAV's current target for uptime is 99.5% per month.
123. Some DHH organizations proposed that the target be increased to 99.97%.
124. In 2022, the CAV stated in its annual report that in 7 out of 12 months, it reached an uptime over 99.97%, including three months at 100%. In 2023, the CAV reported on its website that it reached an uptime over 99.97% in four different months, including two months at 100%.
125. The CAV stated on the public record that uptime should improve with updates to its system, including automated networking monitoring solutions.
126. It also stated that uptime is the subject of contractual arrangements between the CAV and its platform vendor. Therefore, it is not reasonable for it to increase the target until its current contract ends.
127. The Commission acknowledges the importance of the service being available to its users with as few disruptions as possible. Considering the current contractual arrangements, the Commission encourages the CAV to take steps to improve its uptime target from 99.5% to 99.97%, if possible, under its existing contract with its platform vendor.
128. However, the Commission requires the CAV to include a 99.97% uptime target in any future contracts with a platform vendor.

Calculation of uptime

129. It appears from the public record that the CAV may not be including planned outages in this metric. This is apparent because the CAV reports periods with 100% uptime despite its planned daily outage of one or two minutes due to a system restart that takes place at 5 a.m. Eastern time (hereafter, the daily 5 a.m. planned outage).
130. The Commission considers that the inclusion of the daily 5 a.m. planned outage in the uptime calculation is not necessary because it is a recurring outage that is communicated to VRS users. However, all other planned outages, in addition to unplanned outages, should be included in the uptime calculation to accurately reflect the user experience.
131. Therefore, the Commission requires the CAV to include all unplanned and planned outages, except the daily 5 a.m. planned outage, in its calculation of uptime.

132. The Commission notes that some outages may be the result of an individual's Internet or wireless data connections. The CAV is responsible for providing VRS but is not responsible for providing Internet or wireless data connections. Individuals should contact their service providers to report any outages or problems with their Internet or wireless data connections.

Outages

133. DHH organizations and individuals commented on the public record about the number of VRS outages that occurred, the lack of notification to users, and an apparent lack of reporting by the CAV.
134. The CAV stated on the public record that it has reduced the number and duration of VRS outages over time. For example, outage minutes decreased from 2,751 in 2018 to 374 in 2021.
135. However, some DHH organizations suggested that the CAV should better communicate outages to its users. They also proposed that the CAV should provide an estimate of how long each outage will last.
136. The Commission considers that improved outage notifications would have a positive impact on the user experience. The Commission therefore requires the CAV to consider more ways to notify users when there are planned and unplanned outages and to implement them where appropriate. These could include methods such as posting messages on social media platforms and in the VRS application and sending text messages. The CAV should consider user feedback when deciding how to notify its users. The Commission expects the CAV to include the estimated length of planned and unplanned outages in its notifications when possible. The Commission also encourages the CAV to notify users about other disruptions, other than outages, that could result in significantly higher wait times. The CAV is required to report back to the Commission on its efforts in this regard within **one year** of the publication date of this regulatory policy.

Reporting of CAV metrics

137. To further enhance transparency, the Commission is formalizing the collection and reporting of quality-of-service and performance metrics, including the abandon rate metric. The CAV is required to continue to publish its metrics results in its annual report, broken down by quarter. When the CAV does not meet its targets, it must explain in its annual report why it has not and how it has remedied the situation.
138. With respect to outages, DHH organizations asked for more detailed reporting, including the type, reason, and duration of each outage.
139. The CAV currently provides outage information on its website, including the date, start time, and end time of each outage. The CAV does not currently provide information related to outages in its annual report, except for the uptime metric per month and per quarter of the year. The CAV pointed out on the public record that

certain information about the network could increase the vulnerability of the network to hacking or interference.

140. The Commission considers that certain information about the network could be sensitive. However, the Commission expects the CAV to provide any information about the reasons for outages in a manner that would not risk the security of VRS. This could possibly be done by grouping outages under a common cause, such as a hardware component failure, software bug, network problems, planned outage for system maintenance, etc. Improved reporting on outages would give VRS users and the Commission insight into the reliability of the service.
141. With respect to reporting the percentage of total call types, the CAV is required to add the number of 9-8-8 calls because it is a new type of call that the CAV is now handling.
142. To enhance transparency, the Commission requires the CAV to provide more information in its annual report and on its website about all outages. This information must indicate the start and end time of the outage, except for the daily 5 a.m. planned outage, and if the outage was planned or unplanned. The CAV is also expected to provide a brief reason for each outage in a way that will not jeopardize the security of the network and to make this information more prominent on its website. The Commission expects this to be accomplished by the publication of the CAV's next annual report (by **31 August 2025**).

Emergency services (9-1-1 and 9-8-8)

Prioritization of 9-1-1 calls

143. There was support on the record to ensure access to 9-1-1 services for VRS users given that access to 9-1-1 services is critical for all Canadians. There were also comments on the record urging the Commission to require the CAV to prioritize 9-1-1 calls, including creating a separate line for those calls. The CAV submitted that 9-1-1 calls are already treated as priority and are automatically moved to the front of the queue. The Commission recognizes the importance of 9-1-1 calls and considers that the CAV's approach to 9-1-1 calls remains appropriate.

Addition of access to 9-8-8 service

144. Although the 2014 VRS Policy was published before the Commission approved the 9-8-8 service, the CAV stated on the public record that it will ensure its users can access 9-8-8 with VRS.
145. The Commission acknowledges the CAV's practice of prioritizing 9-8-8 calls in a similar way to 9-1-1 calls and reminds the CAV that geolocation data for 9-8-8 calls must not be automatically passed through, consistent with Telecom Regulatory Policy 2022-234.

146. Given the importance of access to 9-8-8 service, the Commission is updating the VRS minimum requirements to include access to 9-8-8 service (see Appendix 3 to this regulatory policy). The CAV is required to also update all relevant CAV documentation to include 9-8-8 service. This documentation includes the CAV's user agreement and video interpreter policies.

Measures to ensure reliable access to emergency services during a VRS outage

147. To ensure VRS users have reliable access to emergency services, the minimum requirements are also being updated to require the CAV to inform its users in advance of any planned outage that will affect access to 9-1-1 and 9-8-8 services. In those notifications, the CAV must include alternative ways to reach 9-1-1 and 9-8-8.
148. The Commission acknowledges that the CAV may need some time to implement these measures. Therefore, the Commission requires the CAV to report back to the Commission on how long it would take to implement them within **six months** of the publication date of this regulatory policy.
149. As a transparency and accountability measure, the Commission is requiring the CAV to include 9-1-1 and 9-8-8 call response times and the breakdown of calls by language (ASL and LSQ) in its annual report. Specifically, the CAV must include in its annual report:
- the average call response times for incoming 9-1-1 and 9-8-8 calls on a per-month basis, grouped by ASL and LSQ; and
 - the number of incoming 9-8-8 calls it receives, grouped by how many calls were in ASL and LSQ.

Awareness, outreach, and promotion of VRS

Education and outreach activities for potential VRS users

150. Education and outreach activities encourage the adoption of VRS. The CAV has been reaching out to potential VRS subscribers, raising awareness of the service with the goal of motivating potential users to register. In the Commission's view, it is important for the CAV to continue its education and outreach activities to make sure that all possible users of VRS are aware of its existence. Therefore, the Commission is maintaining the minimum requirement for the CAV regarding awareness and promotion to potential VRS subscribers.

Education and outreach for the general public, businesses, and institutions

151. There was consensus on the public record that there continues to be a lack of public awareness of VRS among businesses, institutions, and hearing individuals. The Commission acknowledges the need for ongoing outreach and education. As a result, the Commission is maintaining the minimum requirement for the CAV regarding raising awareness and educating businesses, institutions, and hearing individuals.

The Commission also encourages the CAV to develop targeted education and outreach campaigns that address problem areas among businesses and institutions. These campaigns could include an online forum for soliciting user suggestions and feedback.

The CAV's public awareness campaign

152. The public record shows that the CAV has been providing education and outreach to potential VRS subscribers, businesses, institutions, and hearing individuals since 2016. The CAV has done this through bilingual websites, e-newsletters for businesses and institutions, ASL and LSQ videos, social media, community relations programs, and multilingual customer service.
153. The CAV's previous outreach and education plan from 2016 has kept the Commission and the public informed about key areas and developments. However, some comments indicated that the CAV's efforts in this regard could be improved.
154. The Commission acknowledges that the CAV's current outreach and education plan dates to 2016 and considers that the plan should be updated. Accordingly, the CAV is required to submit an updated outreach and education plan to the Commission within **one year** of the publication date of this regulatory policy. The CAV's plan must be available in English, French, ASL, and LSQ and be posted on the CAV's website. The Commission expects the CAV to include an engagement plan outlining activities and target groups as part of its updated outreach and education plan. In addition, the CAV is required to report on its progress on its updated outreach and education plan in its annual report.

Misconceptions about VRS and ensuring users are aware of service upgrades

155. The public record shows that there are misconceptions about VRS, and that users are often unaware of the upgrades made to the service. For some examples of these misconceptions, see Appendix 4 to this regulatory policy.
156. The CAV noted that it has many ways of obtaining user feedback, including its customer service centre, outreach activities, and annual customer survey. The CAV also noted that it has recently developed a consumer consultation panel, which allows for discussions between the CAV's senior management and VRS users. The consumer consultation panel will be an opportunity to discuss desired new features and functionalities, improvements to existing policies, and enhancements to the CAV's consumer outreach activities.
157. To build on the CAV's efforts, the Commission is requiring the CAV to identify, in consultation with its users, how users prefer to be notified of new features and bug fixes. The CAV is required to report its findings to the Commission, including its plans to implement its findings, within **one year** of the publication date of this regulatory policy. The consumer consultation panel is one opportunity for the CAV to obtain user feedback.

ASL and LSQ content on the CAV's website

158. VRS is a telecommunications service for people whose primary language is ASL or LSQ. In the Commission's view, as much information as possible related to VRS should be available in ASL and LSQ, as DHH organizations and individuals advocated on the public record.
159. The Commission acknowledges that the CAV has increased the number of ASL and LSQ videos on its website. The Commission expects the CAV to continue to make ASL and LSQ videos to present information that is currently only available in English and French.

Role of organizations other than the CAV in the promotion of VRS

160. The CAV has been the primary source of education and outreach activities since 2016. However, as submitted by the CAV, other organizations (such as DHH organizations and TSPs) could also contribute to promoting VRS. This could include sharing posts from the CAV's social media pages; adding VRS information to its websites, including a link to the CAV's website; sending targeted emails about VRS; and encouraging members of DHH organizations to attend CAV webinars and other information sessions.

TSPs' role

161. Despite its assertions that the CAV is best positioned to continue awareness and education activities, the Commission considers that TSPs can and should help promote VRS. As a result, the Commission expects TSPs to be active participants in VRS education and outreach initiatives by advertising VRS on their accessibility webpages, training their client services representatives to handle VRS calls, and considering setting up a telephone number for VRS users to reach a VRS-trained TSP client services representative.
162. The Commission notes that the Canadian Telecommunications Association (CTA) currently promotes VRS on CTA websites and encourages it to continue doing so.

DHH organizations' role

163. The Commission acknowledges comments made on the public record that many DHH organizations are volunteer-based and have limited resources. As a result, they would have limited capacity to promote VRS. However, the Commission notes that many DHH organizations promote VRS in some way. The Commission encourages DHH organizations to continue to do so, either independently or in collaboration with the CAV, to the greatest extent possible.

Government and educational institutions' potential role

164. The Commission also has a role in ensuring that Canadians are aware of VRS and has published information and Sign language videos about VRS on its website. The Commission has also promoted VRS on social media.

165. Some comments on the public record suggested that all levels of government, including federal departments, provincial ministries, and educational institutions, play a crucial role in promoting VRS. The Commission acknowledges this suggestion and encourages all levels of government to promote VRS.
166. The Government of Canada's Chief Accessibility Officer has a [mandate](#) to raise public awareness about the importance of accessibility and to change public perceptions of disability. The Commission encourages the Chief Accessibility Officer to continue to help raise public awareness of VRS and to engage with other government agencies and educational institutions when possible and appropriate.

Timing of the next VRS review

167. This review has highlighted how much the CAV has enhanced VRS and how much the service has evolved since 2016. It has also given VRS users an opportunity to communicate the importance that VRS has in their lives. Moreover, this review provided VRS users with a formal forum to communicate where they believe the CAV could evolve further.
168. The CAV and TSPs proposed on the public record that the next review take place no less than five years following the publication of this regulatory policy. On the other hand, the majority of the DHH organizations submitted on the public record that the technology and interpreter marketplaces evolve quickly, and that a shorter review cycle is therefore warranted.
169. In the Commission's view, the CAV will need time to implement the new requirements being imposed on it and the accountability and transparency measures set out in this regulatory policy.
170. For these reasons, the Commission will consider reviewing VRS, in whole or in part, no earlier than five years after this regulatory policy is published.
171. However, the Commission considers that technology and interpreter marketplaces could evolve quickly. Therefore, to address concerns raised on the public record regarding the desire for a shorter review cycle, the CAV is required to create a roadmap in English, French, ASL, and LSQ that outlines its plans to evolve and add new features to VRS.
172. The CAV is required to file the roadmap with the Commission within **18 months** of the publication date of this regulatory policy. In addition, the CAV is required to report on its progress on meeting the objectives in its roadmap in its annual report. The CAV is also required to report changes it has made to its roadmap due to changes in the technology and interpreter marketplaces and user feedback in its annual report.

Conclusion

173. The Commission's intention with this updated policy is to advance five specific objectives—inclusivity and diversity, advancing reconciliation with Indigenous peoples, usability, transparency, and accountability—while ensuring the CAV continues to have the flexibility and resources to connect Canadians.
174. In the 2014 VRS Policy, the Commission set the foundation to eliminate barriers and enhance the lived experiences of persons who rely on VRS to connect, communicate, and belong. This updated regulatory policy represents the next step in that journey.
175. The Commission has put into place the tools and resources to enable the CAV to move VRS from the initial launch and growth phases of its development to the evolution phase.

Secretary General

Related documents

- *Mobile wireless service plans that meet the needs of Canadians with various disabilities*, Telecom Regulatory Policy CRTC 2023-41, 23 February 2023
- *Call for comments – Development of a regulatory framework to improve network reliability and resiliency – Mandatory notification and reporting about major telecommunications service outages*, Telecom Notice of Consultation CRTC 2023-39, 22 February 2023; as amended by Telecom Notice of Consultation CRTC 2023-39-1, 11 September 2023
- *Canadian Administrator of VRS (CAV), Inc. – Application requesting video relay service funding for 2023*, Telecom Decision CRTC 2022-340, 15 December 2022
- *Introduction of 9-8-8 as the three-digit abbreviated dialing code for mental health crisis and suicide prevention services and Northwestel Inc.'s application for modified implementation of ten-digit local dialing*, Telecom Regulatory Policy CRTC 2022-234, 31 August 2022; as amended by Telecom Regulatory Policy CRTC 2022-234-1, 9 December 2022
- *Call for comments – Review of video relay service*, Telecom Notice of Consultation CRTC 2021-102, 11 March 2021; as amended by Telecom Notices of Consultation CRTC 2021-102-1, 26 April 2021; 2021-102-2, 30 June 2021; 2021-102-3, 14 March 2022; and 2021-102-4, 19 September 2023
- *Structure and mandate of the video relay service administrator*, Telecom Regulatory Policy CRTC 2014-659, 18 December 2014
- *Video relay service*, Telecom Regulatory Policy CRTC 2014-187, 22 April 2014

- *Notice of hearing – Issues related to the feasibility of establishing a video relay service*, Telecom Notice of Consultation CRTC 2013-155, 27 March 2013; as amended by Telecom Notice of Consultation CRTC 2013-155-1, 16 May 2013
- *Accessibility of telecommunications and broadcasting services*, Broadcasting and Telecom Regulatory Policy CRTC 2009-430, 21 July 2009
- *Routing of fixed/non-native and nomadic VoIP 9-1-1 calls to public safety answering points*, Telecom Decision CRTC 2007-44, 15 June 2007
- *Emergency service obligations for local VoIP service providers*, Telecom Decision CRTC 2005-21, 4 April 2005
- *British Columbia Telephone Company - Voice relay service centre*, Telecom Decision CRTC 85-29, 23 December 1985

Appendix 1 to Telecom Regulatory Policy CRTC 2025-54

Legal framework

Under section 47 of the *Telecommunications Act* (the Act), the Commission must exercise its powers to implement the telecommunications policy objectives (the policy objectives) set out in section 7 of the Act and in accordance with any policy direction issued by the Governor in Council. The Commission must also act in a manner that is consistent with the *Canadian Charter of Rights and Freedoms*. The Commission recognizes that equality is a fundamental value and a central component of the public interest.

Regulation of the telecommunications system necessarily involves balancing competing objectives. As per the Act, these objectives include 7(a) to facilitate the orderly development throughout Canada of a telecommunications system that serves to safeguard, enrich, and strengthen the social and economic fabric of Canada and its regions; 7(b) to render reliable and affordable telecommunications services of high quality accessible to Canadians in both urban and rural areas in all regions of Canada; and 7(h) to respond to the economic and social requirements of users of telecommunications services.

Subsection 27(2) of the Act provides that no Canadian carrier shall unjustly discriminate in the provision of a telecommunications service or the charging of a rate for it. In Telecom Regulatory Policy 2014-187, the Commission found that the failure to provide video relay service (VRS) in Canada constituted unjust discrimination by Canadian carriers.

With previous generations of relay services, such as teletypewriter (TTY)¹¹ and Internet Protocol,¹² telecommunications service providers (TSPs) were individually required to provide these services. Rather than pursuing that approach, the Commission adopted a model in which VRS would be provided by one independent, centralized third-party VRS administrator, the Canadian Administrator of VRS (CAV), Inc. (hereafter, the CAV), and funded by TSPs. The Commission considered that this approach was an appropriate way of addressing unjust discrimination against Sign language users and was consistent with Charter values and human rights principles.

In Telecom Regulatory Policy 2014-187, the Commission designated VRS as a basic telecommunications service. With this designation, VRS can be funded by TSPs through contributions to the National Contribution Fund (NCF) pursuant to section 46.5 of the Act.

¹¹ See Telecom Decision 85-29 and Telecom Notice of Consultation 2013-155.

¹² See Broadcasting and Telecom Regulatory Policy 2009-430.

The Government of Canada's 2023 Policy Direction¹³ requires the Commission, in exercising its powers and performing its duties under the Act, to consider how its decisions would promote competition, affordability, consumer interests, and innovation. In particular, it requires the Commission to consider the extent to which its decisions would enhance and protect the rights of consumers in their relationships with TSPs, including rights related to accessibility. The Commission considers that persons with disabilities generally are not able to influence the market sufficiently to obtain accessible telecommunications products and services. As a result, the Commission has used measures to promote accessibility that are efficient and proportionate, and that interfere with the operation of competitive market forces to the minimum extent necessary, to meet the policy objectives.

Although the Commission is exercising its powers under the Act in this proceeding, the complementary objective and principles of the *Accessible Canada Act* inform the Commission's work. The *Accessible Canada Act* aims to achieve a barrier-free Canada for persons with disabilities by creating a framework for the proactive and systemic identification, prevention, and elimination of barriers to accessibility. The key principles of this framework are that (i) laws, policies, programs, services, and structures must take into account the disabilities of persons, the different ways that persons interact with their environments and the multiple and intersecting forms of marginalization and discrimination faced by persons, and that (ii) persons with disabilities must be involved in the development and design of laws, policies, programs, services, and structures.

Finally, the Commission is committed to advancing reconciliation with Indigenous peoples in Canada. The *Accessible Canada Act* recognizes Indigenous Sign languages (ISLs) in subsection 5.1(2) as one of three primary languages for communication by Deaf persons in Canada. The Commission also recognizes that a stated purpose of the *Indigenous Languages Act* in paragraph 5(a) is to support and promote the use of Indigenous languages, including ISLs.

¹³ *Order Issuing a Direction to the CRTC on a Renewed Approach to Telecommunications Policy*, SOR/2023-23, 10 February 2023

Appendix 2 to Telecom Regulatory Policy CRTC 2025-54

Issues and suggestions that are out of scope of this review

Out-of-scope issues

In Telecom Notice of Consultation 2021-102, the Commission indicated that the following issues were out of scope of this review:

- appropriate wireless service plans for persons with disabilities (see Telecom Regulatory Policy 2023-41);
- the future of teletypewriter (TTY) service;
- other text-based message relay services; and
- other communications services, such as captioned telephone service (i.e., CapTel), for people who are Deaf or hard of hearing or who have speech disabilities.

Out-of-scope suggestions

Furthermore, over the course of this review, some video relay service users raised issues that, while important, are not within the scope of this review. Specifically, these issues are:

- access to and quality of Internet connections;
- affordability of technology;
- outages of services provided by telecommunications service providers (see Telecom Notice of Consultation 2023-39);
- providing tactile interpreters in communities;
- special programs or funding for people who cannot afford laptops or cell phones (parties also suggested that the Commission establish such a program);
- funding for video interpreter training programs (this falls under provincial jurisdiction); and
- the shortage of video interpreters.

Appendix 3 to Telecom Regulatory Policy CRTC 2025-54

Updates to minimum requirements for video relay service and its administrator

Requirements for the video relay service administrator

1. Operate and monitor a national video relay service (VRS) system that meets the requirements set out below or otherwise set out by the Commission.
2. Operate VRS in accordance with the administrator's bylaws, mandate, and any other corporate documents approved by the Commission.
3. File updates with the Commission for information if any modifications are made to the processes that the administrator will follow for
 - (a) resolving complaints between registered VRS users and itself or any VRS provider(s), with a mechanism to escalate complaints to the Commission;
 - (b) recording and maintaining VRS data on usage and demand (including monthly reports generated by the VRS technology platform) so that any trend analysis may be completed regarding call traffic patterns sorted by day and by hour, call volume of completed and abandoned calls, call duration, wait times for completed and abandoned calls, technical areas, and other related issues; and
 - (c) recording and maintaining data with respect to the provision of VRS, including, at a minimum, quality-of-service measures; financial accountability measures; and the number and nature of (i) complaints and inquiries (including those related to video interpreter¹⁴ service and technical errors or technology compatibility); (ii) video interpreters (including the number of video interpreters hired, the average wage rate and availability, and certification requirements); and (iii) planned and unplanned outages.
4. File updates with the Commission for information if any modifications are made to the privacy and confidentiality standards for the provision of VRS that meet the criteria set out in paragraph 135 of Telecom Regulatory Policy 2014-187 (the 2014 VRS Policy).
5. File any information requested by the Commission about the administrator's operations.

¹⁴ In Telecom Regulatory Policy 2014-187, the term used in the minimum requirements was "operator." However, the term more commonly used now and therefore used throughout this regulatory policy is "video interpreter."

6. Develop and file with the Commission for information, within **one year** of the publication date of this regulatory policy, an updated outreach and education plan to encourage the adoption of VRS by users with and without disabilities, including hearing individuals (e.g., general public), businesses, and institutions (e.g., financial institutions). In the plan, the administrator must describe, at a minimum, targeted education efforts to inform registered VRS users about the features of VRS, how to effectively place VRS calls with businesses and institutions, and how to access emergency services (9-1-1 and 9-8-8) using VRS and when VRS is not available.
7. Demonstrate that it has made all reasonable efforts to ensure that American Sign Language (ASL) and Langue des signes québécoise (LSQ) services are equally comprehensive regardless of whether ASL and LSQ users are served by the same or separate VRS providers. The administrator is not to limit one service to ensure its equality with the other service.
8. Ensure that staff and any advisory panels that may be struck to advise the board of directors include the perspectives of ASL and LSQ communities.
9. Engage on an ongoing basis with current or potential VRS users whose primary language is ASL or LSQ and who are Indigenous to better understand their specific needs. The administrator must also provide an update in its annual report on the status of engagement and the steps it has implemented or plans to implement to better serve Indigenous people who are Deaf and whose primary language is ASL or LSQ.
10. Ensure that the total of all VRS-related costs does not exceed \$41 million annually for a fully subscribed, full-time service.
11. If all minimum requirements are met, notify the Commission of the administrator's annual funding requirements by way of a letter to the Secretary General in English, French, ASL, and LSQ. The letter must
 - (a) be filed by **August 31** each year;
 - (b) specify the amount of funds needed from the National Contribution Fund for the next calendar year, which should never exceed the cap set out in the updated policy;
 - (c) provide a reference and link to the administrator's annual report;
 - (d) attest by way of an affidavit from the administrator's chief executive officer that the minimum requirements set out in the updated policy have all been met (all minimum requirements must be listed in the affidavit);
and
 - (e) be made available on both the administrator's website and the Commission's website in both official languages and in ASL and LSQ.

12. If one or more of the minimum requirements are not met, file a Part 1 application pursuant to the *Canadian Radio-television and Telecommunications Commission Rules of Practice and Procedure* with the Commission by **August 31** each year to request its annual funding.
13. On a date set by the Commission before each VRS review, file with the Commission for approval modified or updated
 - (a) quality-of-service standards;
 - (b) guidelines to resolve complaints, including service standards; and
 - (c) reporting requirements.
14. When a VRS platform provider offers all or some of the VRS, include in any request for proposals, and in any resulting contract, a requirement that a VRS platform provider must
 - (a) provide a service (or a portion of a service) that complies with (or allows the administrator to comply with) the requirements in this appendix or otherwise established by the Commission;
 - (b) provide to the administrator, or to the Commission directly, any information regarding its operations for monitoring or review purposes, including any data collected or reports generated;
 - (c) handle and monitor user complaints in accordance with the mechanism established by the administrator;
 - (d) record the following information in relation to the services provided:
 - (i) video interpreters (including the number of video interpreters hired, the average wage rate and availability, and certification requirements);
 - (ii) demand data (including, at a minimum, detailed call traffic patterns sorted by day and by hour, call volume, call duration, abandoned calls, and average wait time); and
 - (iii) complaints and inquiries data relating to video interpreter service and underlying technology;
 - (e) indicate the price the VRS platform provider will charge registered VRS users for long distance calls and any ancillary services;
 - (f) indicate in bids whether long distance calling cards are compatible with the service, and if so, identify which calling cards are compatible;

- (g) limit its contract term with the VRS platform provider to a maximum of five years, with the option of an extension, to allow for possible changes resulting from the Commission's review of VRS; and
- (h) cooperate with the administrator and any other VRS platform providers to ensure seamless transitions at the beginning and the end of the contract term.

15. Consider, when operating and modifying VRS,

- (a) interoperability with other jurisdictions' VRS systems to the extent possible to facilitate point-to-point calls internationally;
- (b) interoperability between VRS and message relay service, as described in the International Telecommunications Union Total Conversation standard;
- (c) promotion of consumer choice in end-user devices that are current, off the shelf, and popular;
- (d) separation of the technical and video interpreter elements of VRS; and
- (e) minimization of system outages.

Minimum requirements for VRS developed by the VRS administrator

- 16. Provide video relayed calls in both ASL and LSQ.
- 17. Use telephone numbers that conform to the North American Numbering Plan and provide universal access to and/or from the public switched telephone network.
- 18. Use a single common VRS technology platform nationally that can support multiple video interpreter providers.
- 19. Use non-proprietary VRS technology based on current and evolving industry-accepted technical protocols.
- 20. Use a specialized platform for VRS unless the key features mentioned in paragraph 103 of the 2014 VRS Policy become available on non-specialized platforms.
- 21. Provide service 24 hours per day, 7 days per week.
- 22. Make access to information about planned outages and system status prominent on its website.
- 23. Include the ability for registered VRS users to make point-to-point calls (i.e., calls between registered VRS users without the use of a video interpreter).
- 24. Support caller identification (caller ID) blocking.

25. Include Hearing Carry Over and Voice Carry Over functionalities.
26. Provide notifications of incoming calls to registered VRS users.
27. Create a database of registered VRS users accessible to the administrator that includes registered users' address information and has a mechanism for registered users to update their information online and through customer service.
28. Provide access to 9-1-1 service 24 hours per day, 7 days per week using the same approach that the Commission mandated for nomadic voice over Internet Protocol 9-1-1 services, as set out in Telecom Decisions 2005-21 and 2007-44. Specifically,
 - (a) the video interpreter must act as the intermediary between the registered VRS user and the 9-1-1 call operator at the public safety answering point (PSAP);
 - (b) 9-1-1 service must be provided using the incumbent local exchange carrier's tariffed emergency call routing operator service so that the video interpreter has priority access to PSAPs across the country;
 - (c) when they register for VRS, VRS users must be informed how to reach 9-1-1 in instances when VRS is unavailable;
 - (d) registered VRS users must be informed in advance of any planned VRS outage that will affect access to 9-1-1 services;
 - (e) whenever registered users are notified of a planned or unplanned VRS outage, they must be provided with information about alternative ways to reach 9-1-1;
 - (f) an onscreen notification must appear when a registered VRS user tries to place a 9-1-1 call in instances when VRS access to 9-1-1 is unavailable (such as during a planned or unplanned outage), including the duration of the outage if known and alternative ways to reach 9-1-1; and
 - (g) each registered VRS user's address information must be entered into a database and automatically provided to the video interpreter during a 9-1-1 call made via VRS. Moreover,
 - (i) the user-provided address information is to be used as a last resort in situations where the registered VRS user is unable to provide or confirm their location; and
 - (ii) registered VRS users must have the capacity to update their address information for 9-1-1 purposes online and through customer service.

29. Provide access to 9-8-8 service 24 hours per day, 7 days per week, consistent with Telecom Regulatory Policy 2022-234. Specifically,
 - (a) the video interpreter must act as the intermediary between the registered VRS user and the 9-8-8 counsellor;
 - (b) when they register for VRS, VRS users must be informed on how to reach 9-8-8 in instances when VRS is unavailable;
 - (c) registered VRS users must be informed in advance of any planned outage that will affect access to 9-8-8 service;
 - (d) whenever the administrator provides notifications of a planned or unplanned VRS outage, it must include alternative ways to reach 9-8-8;
 - (e) registered VRS users must be provided with an onscreen notification when they try to place a 9-8-8 call in instances when VRS access to 9-8-8 is unavailable (such as during a planned or unplanned outage), including the duration of the outage if known and alternative ways to reach 9-8-8;
30. Use a screening process to ensure that video interpreters are qualified Sign language interpreters, meaning that they can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary.
31. Provide VRS to registered VRS users upon their self-certification that they use ASL or LSQ as their primary language of communication due to a disability and their consent to a user agreement. This agreement must outline, at a minimum, privacy and confidentiality policies, a fair usage policy, information on 9-1-1 and 9-8-8 access, and a billing agreement for ancillary and long distance service. The agreement must also be
 - (a) in plain language (i.e., clear, simple, and concise language);
 - (b) available in ASL and LSQ; and,
 - (c) signed before services are rendered.
32. Provide to the registered VRS user a user technology interface and written materials that are in plain language and offered in the official language of the registered VRS user's choice. The contents of the written informational materials are to be offered in English and French and are expected to be provided in ASL and LSQ.
33. Provide VRS at no additional cost to the registered VRS user.
34. Ensure that ancillary services, such as call display, video mail, etc., when offered, are billed to registered VRS users who subscribe to these services at rates similar to those charged for corresponding voice services.

35. Offer registered VRS users long distance services at rates similar to those charged for other long distance services. Long distance calls initiated by registered VRS users are to be billable to the user, based on call duration.

Appendix 4 to Telecom Regulatory Policy CRTC 2025-54

Features suggested on the public record that are already or will soon be offered and misconceptions about video relay service

Features suggested on the public record that are already or will soon be offered

The Canadian Administrator of VRS (CAV), Inc. (hereafter, the CAV) submitted on the record of this review that it has already implemented or will soon be implementing several features. More details can be found below:

- Call notifications are currently available on video relay service (VRS). Call notifications have been implemented since the first generation of the CAV's applications for mobile devices and computers. Enhanced call notifications have been added, including vibration and light notifications on mobile devices; notifications via Fitbit watches; and a third-party product that consumers can purchase, the Blynclight, which can be connected to Mac or PC computers and flash when a user receives a VRS call. The CAV's website provides information about the notifications, including how to enable the Blynclight and other light notifications on smartphones.
- Font size and contrast control features are currently available for improved accessibility for registered VRS users who are partially sighted.
- The CAV's VRS applications are compatible with 1080p screen resolution, and the CAV indicated that a 16:9 screen ratio will be available in its 2023 next generation mobile application release. Deaf groups requested this screen ratio so that they could project VRS on larger screens, such as smart televisions.
- Expanded customer service hours, during which users can communicate with a live customer service representative in Sign language, voice, or text, are currently available. In July 2022, the hours were expanded to 9 a.m. to 9 p.m. Eastern time (6 a.m. to 6 p.m. Pacific time), Monday to Friday, to provide better support to registered VRS users in western Canada. The CAV noted that it does not have weekend support hours due to challenges associated with attracting and retaining scarce, highly trained technical support staff who are fluent in American Sign Language (ASL) and/or Langue des signes québécoise (LSQ). However, the CAV is monitoring the labour marketplace and will reconsider this policy if the situation improves.
- An option for users to self-announce their VRS call is currently available. The default is for the video interpreter to announce to the hearing party that it is a VRS call and that there will be an interpreter present; however, users can inform the video interpreter that they want to self-announce. The CAV has indicated that in upcoming releases of its applications, a toggle feature will be implemented in the customer profile for the user to signal to the video interpreter that they want to

self-announce. The CAV posted information about this, including in ASL and LSQ videos, on its frequently asked questions webpage in April 2022.

- Caller identification (caller ID) display for incoming calls is currently offered if the data is available.
- Caller ID blocking for outgoing calls has been available since the first generation of the CAV's applications. Users can choose to hide their caller ID for all calls or on a per-call basis.
- Three-digit dialing (also referred to as N11 services) is currently available. In addition to supporting 9-1-1 as required, VRS supports 9-8-8 dialing. The CAV currently supports the other three-digit codes listed below:
 - 2-1-1 (community services) in all provinces and territories;
 - 5-1-1 (traffic information) where available (British Columbia, Alberta, Saskatchewan, Manitoba, Ontario, Quebec, New Brunswick, Prince Edward Island, Nova Scotia, and Yukon);
 - 8-1-1 (provincial healthcare access line) in all provinces and territories except Nunavut; and
 - 3-1-1 support (municipal government non-emergency services) where available (British Columbia, Alberta, Manitoba, Ontario, Quebec, and Nova Scotia).
- The VRS user terms and conditions are now available in ASL and LSQ videos.
- The CAV has removed its policy limiting callers to making three calls in sequence, noting that before this change, the policy was applied with flexibility and only when there was a queue.
- The CAV has made updates that include fixes for issues reported by users related to application crashes and missing call notifications.

Misconceptions about video relay service on the public record

As indicated in this regulatory policy, the public record shows that there are misconceptions about VRS. It also shows that users are often unaware of the upgrades made to the service. For example, during this review, the CAV clarified the following:

- Contrary to a complaint on the public record that there are call duration limits, there is no maximum duration limit to calls except for conference calls that are limited to 1.5 hours as per the CAV's user agreement. Participants in the virtual discussion sessions held by the Commission provided examples of extremely lengthy calls (indicating there was no limit on call durations).

- Contrary to comments on the public record, there is no policy prohibiting a Sign language user from using another user's account. However, users are expected to identify themselves accurately for fraud prevention, privacy protection, and service integrity considerations.
- If a VRS call disconnects prematurely, the video interpreter uses a callback feature, as needed, to try and re-establish the connection. The CAV explained that dropped calls are typically related to (i) failures of users' equipment, (ii) problems encountered by the user with wireless connectivity or with the underlying Internet service, or (iii) bugs, conflicts, or errors in users' applications.

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Other suggested enhancements

Video remote interpretation

Video remote interpretation (VRI) is a service whereby the two parties, a Sign language user and a person who does not use Sign language, are in the same location for an in-person conversation, and they use a remote interpreter via video conference. The interpreter interprets the conversation for the two parties via video.

Given that VRI is not a telecommunications service, it would be inappropriate for the NCF to fund a non-telecommunications service. The Commission will not change this approach, except for the Canadian Administrator of VRS (CAV), Inc.'s (hereafter, the CAV) current practice with respect to emergency calls.

Organizations, businesses, and institutions should use the VRI services available from a variety of providers in the marketplace if they want to use a VRI service.

Call recording

The CAV submitted that it has a strict policy against recording VRS calls. It added that it neither does so nor permits this practice by users. According to the CAV, this is a matter of its commitment to both its users' and interpreters' privacy. In the frequently asked questions on its website, the CAV explains that it does not record calls for quality and training purposes. Instead, calls are monitored side by side by supervisors who verify with the VRS user if this is acceptable. In the Commission's view, the CAV's views on this matter are appropriate, particularly in light of privacy and confidentiality concerns.

Eliminating transfers between video interpreters

Some parties expressed concern about transfers between video interpreters and recommended that this practice be eliminated.

The CAV argued that call transfers are an operational reality due to video interpreter health and safety considerations and due to respecting the integrity of workplace scheduling processes. As noted by the Canadian Association of Sign Language Interpreters and the CAV, video interpreters' work can be highly stressful. The CAV also noted that it has established guidelines to minimize transfers.

Furthermore, as of June 2022, calls transferred between video interpreters are prioritized to be handled by the first available video interpreter, second in priority only to emergency calls. This practice is meant to minimize the impact of transfers.

Based on the CAV's explanation and the steps it has taken, the Commission finds that regulatory action is not required at this time.

Use of the customer service line

Parties suggested that the CAV separate its 9-0-5-0 customer service line into two distinct services: one with separate channels for feedback about video interpreters and about the service, and the other for general customer service. They argued that a separate mechanism is needed because they are not comfortable providing feedback about interpreters to the 9-0-5-0 line.

Given that the CAV is independent, the Commission considers that the CAV is best positioned to determine the best approaches for receiving complaints and inquiries. The Commission also finds, as argued by the CAV, that a single number for user complaints and inquiries is similar to the use of a centralized contact number by telecommunications service providers for a wide range of user issues.

The Commission considers that having a single number for user complaints is an effective and efficient way to respond to an array of customer questions, requests, and issues.

An ombuds for handling complaints

There were comments on the record suggesting that an external ombuds similar to the Commission for Complaints for Telecommunications-television Services (CCTS) should be established to handle complaints related to the CAV.

In the Commission's view, it would be impractical for an external ombuds to deal with any technical VRS complaints because this would require knowledge of the proprietary information related to the platform. In addition, VRS is offered free to users, and there would be no reimbursements of fees or costs associated with delivering VRS to users, which the CCTS does for complainants.

If VRS users are not satisfied with the CAV's response to complaints, they may send them to the Commission for its consideration. For clarity, the Commission would forward the complaint to the CAV for its response. The Commission would then consider the CAV's response in the context of other appropriate information. Based on all the information available to it, the Commission would determine if any follow-up actions would be necessary.

Finally, the Commission reminds registered VRS users that they should send any issues with their underlying Internet and wireless services to the appropriate service provider and, when appropriate, to the CCTS.

Suggestions that fall outside of the Commission's jurisdiction

There were suggestions made on the public record that do not fall within the Commission's jurisdiction because they are related to non-telecommunications services. VRS is a basic telecommunications service that is funded by telecommunications service providers via the National Contribution Fund (NCF). It would be inappropriate for the NCF to fund a non-telecommunications service.

The following suggestions are therefore out of scope:

- in-person communications facilitator services for users who rely on tactile sign language;
- in-person technical support house calls for users, particularly those who are Deafblind or who are not technically savvy; and
- translation of American Sign Language to French and Langue des signes québécoise to English.