

May 27, 2013

John Traversy
Secretary General
Canadian Radio-television and Telecommunications Commission
Les Terrasses de la Chaudière
1 Promenade du Portage
Gatineau, Quebec J8X 4B1

Dear Mr. Traversy,

Re: Telecom Notice of Consultation CRTC 2013-155 *Proceeding to address issues related to the feasibility of establishing a video relay service (VRS) in Canada*

1. The Canadian Wireless Telecommunications Association (CWTA) is the authority on wireless issues, developments and trends in Canada. It represents cellular, PCS, messaging, mobile radio, fixed wireless and mobile satellite carriers as well as companies that develop and produce products and services for the industry.
2. CWTA is pleased to file its comments with respect to the above-noted proceeding on the establishment of a Video Relay Service (VRS) in Canada. CWTA and its members believe that access to telecommunications for all Canadians is important. The Commission should carefully weigh the benefits of a possible VRS with other factors, including the costs and risks of providing such a complex offering. First and foremost, CWTA supports exploring all options, including VRS; however, the Commission must ensure any VRS mandate for Canada is sustainable and uses resources as efficiently as possible.
3. Establishing VRS in Canada would be a significant undertaking, and the development and maintenance associated with the service could impose costs that are far different than those incurred for other relay services. In the event VRS service is mandated, Canada should take advantage of the VRS implementation experiences of other countries when considering our own service parameters and operational model. The CWTA recommends using the findings of the *Mission Consulting – VRS Feasibility Study, April 4, 2012* (Mission Consulting Report) as a base to develop a made in Canada solution to VRS, if the Commission decides to mandate VRS. We also note that TELUS undertook a trial of VRS in Alberta and British Columbia, and the results of that trial would also prove instructive in this regard. While addressing the needs of Canadians efficiently will be challenging, the Mission Consulting Report highlights that we are in a good position to learn lessons from other countries and develop a service that works for Canadians. Indeed, the TNC for this proceeding also recognizes the significant value of building on the experiences of other jurisdictions with respect to developing a VRS delivery model.

4. The CWTA notes that neither the Mission Consulting Report nor the TELUS trial explored a VRS that would be available on wireless devices and over wireless networks. Should VRS over wireless networks be contemplated, the significant differences between wireline and wireless networks would have to first be fully considered. For instance, two-way video services have significant bandwidth demands on wireless networks that would have to be taken into account in any formal VRS framework.
5. CWTA also notes that while Canada's telecommunications service providers (TSPs) can comment on internet capabilities and VRS on their networks, the TSPs are generally not experts in sign language interpretation or the costs associated with the back-end provisioning of VRS. Comments on potential implementation costs and obligations associated with VRS are best provided by VRS providers themselves, given that TSPs do not have any experience with VRS, or the provision of sign language interpretation.

Conclusion

6. CWTA reiterates that access to telecommunications for all Canadians is important. If the Commission decides to mandate VRS then establishing a made-in-Canada solution based on careful consideration of all the development and implementation options is the best way to ensure a successful service that works for both industry and consumers.
7. CWTA appreciates the opportunity to share its views with the Commission.

End of Document