

SUBMISSION ON ACCESSIBILITY OF TELECOMMUNICATION AND BROADCASTING IN CANADA

Canadian Council of the Blind (CCB)

By Kim Kilpatrick and Shelley Ann Morris

Introduction:

Kim Kilpatrick and Shelley Ann Morris are employees of the Canadian Council of the Blind. Kim is the Coordinator of the Get Together With Technology Program, a community-based, user-driven program providing technology training by, and for people who are blind or have low vision. Kim has been blind since birth, and has a Guide Dog. Shelley Ann serves as a Receptionist/Administrator at CCB's National Office. Shelley Ann was born with low vision.

Accessible Internet for People with Disabilities

The Internet has become an important and necessary part of our lives. This is especially true for those with disabilities. People who are blind, deaf-blind or who have low vision rely heavily on the provision of reliable, fast internet services on a daily basis. We use our computers to 'look up' information, for online banking, shopping, job searching and much more. Some people work from home, and others participate in continuing education. The internet also enables people to stay current and participate in democracy at the municipal, provincial and federal levels. Accessible telecom services are necessary in order to make sure

that everyone will have access to candidates' debates, voter information and election results. Real-time reporting of emergency situations should also be available to all, including those requiring Descriptive Video Services (DVS). Traditionally, TV and radio have been excellent resources during an emergency. The recent implementation of a Canada-wide Emergency Alert System is a great step forward. We must always continue to relay emergency information in formats for everyone, including those with low or no vision.

Robust internet is necessary as people with disabilities are making use of applications that require Wi-Fi in the home, such as blindness-specific apps like Be My Eyes, Be Specular, Tap Tap See, Seeing AI and more. Smart speakers (such as the Google Home or Amazon Echo) allow people to access information and control many devices within the home. Meeting apps, such as Zoom, Skype and FaceTime also require the provision of a good Wi-Fi connection. As mentioned earlier, Canada has launched an Emergency Alert service enabling many people to receive important information through their connected devices. Today, being 'connected' will enable people with disabilities to enjoy peace-of-mind as well as independence using various types of notifications and alarms. Connectivity will also help to reduce feelings of isolation among those whose disabilities limit their opportunity to leave their homes.

The rise of smart home technology is dependent on internet and will benefit those who are blind, deaf-blind or have low vision. Devices such as smart appliances will make it easier to turn on ovens, washers and dryers, or adjust thermostats. Touch screens could make some devices inaccessible to those with low or no vision; therefore smart switches are a necessity.

Smart switches will also assist those with total blindness to know when lights are on or off and enable those with low vision to come home to a well-lit environment. Lights that are set on timers make a home look 'lived in,' deterring thieves. Smart devices and motion detectors allow those who are blind or have low vision to know if there is someone on their property or at their door.

Those who are blind, deaf-blind or have low vision have increased access to printed material that has been converted to an accessible format. Access to this material is often gained through devices that use the internet, such as digital talking book players, and the requirement to download accessible books over Wi-Fi, such as material from Bookshare or CELA library.

Internet services must be reliable, available and affordable to all Canadians, especially those who are living in remote areas. These services require sufficient speed to support the many applications and services that are utilized by those with disabilities. Carriers who supply Internet must be able to assist their customers who have disabilities to determine the appropriate levels of services to meet their individual needs.

Data

When Canadians who are blind, deaf-blind, or have low vision are out and about, they need their cell phones to navigate the world safely through GPS and transit apps, to be able to identify locations and objects using video call apps such as skype, Face Time, and be My Eyes, and must to be able to make calls or texts when needed as public payphones are becoming scarce.

Canadians who are deaf-blind often use texting to communicate with sighted and or hearing people in stores and in other situations.

Being able to make calls, texts, send e-mails and communicate with virtual assistants are crucial to the independent travel of those who are blind or have low vision. Also, using ride sharing services such as Uber or Lyft involves the use of data as does tracking a route while walking, on public transit, or in private vehicles.

It is crucially important that Canadians who are blind, deaf-blind or have low vision, should not need to worry about their data usage for apps that provide invaluable independence and assistance in their everyday lives.

Using these apps should not be limited by financial restrictions or inadequate data networks or plans. All Canadians who are blind, deaf-blind or have low vision must have affordable, reliable, data plans that have large amounts of data available and are easy to understand and use. Unlimited phone minutes and unlimited texting as well as voicemail and call waiting, must also be included in all plans. These services and apps will keep Canadians who are blind, have low vision or who are deaf-blind safer, and more independent and confident in their travel and participation in all activities when out and about. This increased data plan would provide equity with those who have the advantage of being able to see.

Quality Assurance, Quality Control and Quality Monitoring of Telecommunications Services in Canada

In order to ensure that Canadians will have accessible telecommunications services, certain steps must be taken to establish and maintain these services.

We suggest that an Accessibility Advisor position be established to oversee the provision and maintenance of accessible telecommunications services for all Canadians. This role should be augmented by the formation of an Accessibility Advisory Committee comprised of people who have a diverse range of disabilities and experiences. All voices should be included as there are many who may have other disabilities, along with blindness, deaf-blindness or low vision. Disability often intersects with membership in other groups, such as seniors or New Canadians; therefore, the Advisory Committee should be made up of a diverse population so that all viewpoints may be considered.

The Accessibility Advisor and Committee would have many roles and responsibilities. A team of 'mystery shoppers' would periodically fan out among the various telecommunications providers, armed with checklists and tasks to make sure that consumers are getting the most accurate, up-to-date information regarding equipment, services, plans and benefits.

From a Human Resources perspective, the Accessibility Advisor and Committee would provide information about hiring and training for carriers. It is recommended that people with disabilities occupy roles in all levels of staffing in all carriers and telecommunications companies, including management, sales, call-center employees and beyond.

Along with the staff at the carriers and companies, the Accessibility Advisor and Committee would assist in strengthening customer service training and the reinforcement of the laws and training practices currently in existence. The Accessibility Advisor and Committee would also encourage the use of uniformity of plans, programs and services for those with disabilities, regardless of the carrier they choose. Benefits for those who have disabilities should be available universally to enable choice. Discounts for those who have disabilities must be presented in clear language during face-to-face interactions, on the telephone and listed on the carriers' websites. These benefits should be available through all carriers. Additionally, the Accessibility Advisor and Committee would serve as a resource to carriers who want to improve their ability to provide excellent service to their customers with disability-related requirements.

As telecommunication systems, standards, policies, products and services change, the Accessibility Advisor and Accessibility Committee would be responsible for constant vigilance in monitoring and reviewing these changes to ensure that they remain fully accessible to all over time. They must also be actively involved in the development and implementation of any changes, as well as the development of new policies and procedures to guarantee that those with disabilities will not be excluded.

Media

More people who are blind, deaf-blind or have low vision should be represented in all forms of media. This would include actors, producers, directors, journalists, videographers, bloggers and more. This should be the case across all platforms of media including radio, TV, social media, and any additional platforms that are developed in future.

All forms of media must have descriptive video. The button turning on or off this feature should be easy to find and easy to access, especially by those with limited or no vision, eliminating the reliance on sighted assistance. Descriptive video needs to be as widely available and as consistent as closed captioning is now. News specials and all forms of media must also include descriptive video. All social media platforms must be continuously assessed to determine their accessibility. All news, emergency alerts, special election programming, and information must be available on all platforms and should be easy to access.

All forms of media need to include original content created by and for people with disabilities. Wherever possible, foreign content shown in Canada should be governed by these same guidelines as Canada has a large multicultural population whose requirements must also be included.

Typically, Satellite Radio is used in vehicles. While larger, scrolling print is an option on the screens of many models of radio, the choice of having information on satellite radio screens voiced out loud would be helpful to those who are blind/low vision as well as to those who are behind the wheel.

New devices being developed and distributed by carriers should not be allowed unless they are fully accessible and other devices such as radios, TVs etc. should be assessed for their accessibility to better inform consumers who may have different needs. Podcast catchers that are new should be assessed for their accessibility.

Radio and TV traffic reports and similar reports, should consider how all consumers get around and not just focus on drivers. Pedestrians and transit riders must be given equal amounts of information.

Assisting Consumers with Disabilities

As mentioned earlier in this document, there have been many positive developments surrounding the provision of services for those who have disabilities. The AODA (Accessibility for Ontarians with Disabilities Act, Nova Scotia Accessibility Act, (ADA) Americans With Disabilities act, and similar legislation has been put in place. As we move toward an Accessible Canada Act, these standards of service will become even more important. People who are blind, deaf-blind and who have low vision are consumers who may require additional services and supports when choosing, purchasing, installing and maintaining telecommunication services and devices.

Many organizations create a preference or profile of their customers' likes and requirements. Such a profile should be created for customers who are blind, deaf-blind or have low vision. This would provide much quicker, more efficient service, eliminating frustration, embarrassment and the need for repeated explanations of disability.

Many call centers set strict limits on the length of time that a representative spends resolving a customer's issue. These limits must not apply when services are being provided to someone with disabilities as issues may take considerably longer to remedy. Technicians who work in this area must be paid by the hour and not by the number of calls or amount of service provided.

Technicians are sometimes required to do home visits to install or repair equipment. Considerations must be put in place when visiting a customer who has disabilities. Notifications are, and should continue to be sent when technicians are en route, increasing safety and security for all, especially those who are blind, deaf-blind or have low vision. A profile would alert the visiting technician to the customer's requirements. If necessary, time would be allotted to orient the customer to the new equipment and accessibility features. Manuals must be available in accessible formats, and clear, easy-to-find information about where to call or click should a problem arise must be provided. Many service providers encourage their customers to use apps, allowing them to pay for the service as well as monitor and or control usage. Apps must be easy to read and/or compatible with screen reading/screen magnification software. For those who use this information from a computer, carriers must also ensure that their websites are easy to use and compatible with screen-magnification/screen reading technology.

Equipment that contains accommodative features, such as 'talking' set-top boxes and the services that support them must be made available to those with disabilities. Many people with disabilities cannot afford the cost of high-end items needed to get access to these services, and are therefore systemically excluded without the availability of lower-cost options.

Mobile phones have changed over the years with a wide array to choose from. With such a variety of phones on the market, it is imperative that information be readily available about ongoing hardware and software supports and upgrades. 'Special' or 'adaptive' cellular phones must be able to keep pace with technology upgrades. Cellular phones should be upgraded or

discontinued in order to ensure their continued use and guard against forced obsolescence.

Companies such as APPLE and Microsoft provide dedicated telephone numbers that users with no or low vision can call to receive specialized assistance with technology. All carriers must provide an Accessibility Line for customers who use screen reading/screen magnification software in order to address their specific issues and requirements. The constant cat-and-mouse game of catch-up and the lag between system and software upgrades and assistive technology necessitates that blind/deaf-blind and low vision customers need access to specialists who can address these problems as they arise.

About The Canadian Council of the Blind

The CCB was founded 75 years ago by returning blind veterans and schools of the blind in the waning months of 1944 and World War II. The CCB is the largest membership based organization of the blind with 85 chapters across Canada.

To celebrate our 75th Anniversary the Canadian Council of the Blind is dedicating 2019 to “our Year of Accessibility”. The CCB is dedicated to working towards improved accessibility and a barrier free Canada while at the same time continuing its efforts to enhance the quality of life of Canadians who are blind and have low vision.

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