

**From:** Jim Roots [jroots@cad.ca]  
**Sent:** September 1, 2006 10:50 AM  
**To:** Procedure  
**Subject:** Telecom Public Notice 2006-10

The Canadian Association of the Deaf (CAD) has made attempts to register for and participate in the above proceeding via the CRTC's on-line facilities. It appears we have not been successful. Therefore we are submitting our comments in the above matter by direct email, as follows:

- 1. The Canadian Association of the Deaf (CAD) registered for participation in this proceeding on July 26th. Somehow the CRTC did not include us in the list of registrants and we have not received any further documents or notices in this matter. We request that, in light of this error, we be allowed to provide comments despite the proceeding's being at the interrogatory stage.**
- 2. The CAD is composed of, and represents, Deaf Canadians who are the primary users of TTYs. It is patently obvious, then, that we must be considered the primary stakeholder in any consideration or proceeding to do with TTYs, including the current ILECs request to cease the 50% discount to registered TTY users. This proceeding cannot be considered credible in the eyes of Canadian consumers if we are not permitted to participate.**
- 3. The ILECs argue that the discount has to do with competition. This is nonsense as far as the TTY discount is concerned. The TTY discount was originally argued, and accepted by the Commission, on the grounds that it takes a TTY user at least four times longer than a voice-phone user to conduct a call. The maximum speed at which a TTY user can call is about 40 words per minute; the average speed at which a voice-phone user can call is about 160 words per minute.**
- 4. TTY users have not become capable of typing 160 words per minute since the Commission's original decision a dozen year ago. Voice-phone users have not slowed down their speech to 40 words per minute. The gross imbalance still exists and it will continue to exist for the foreseeable future.**
- 5. On these grounds alone, then, the continuation of the discount is fully justified. No arguments have been presented to dispute this point.**
- 6. The CAD supports the suggestion of the ILECs that the discount should be extended to wireless and other telecommunications services.**
- 7. Wireless services are, quite frankly, outrageous rip-offs where Deaf and hard of hearing people are concerned.**
- 8. Deaf people are provided with access to only one inter-personal communications function on wireless devices: text messaging. Yet, far from being given discounts for the fact that we cannot access other, voice-based features, we are in fact further penalized by being charged extra fees for waiving or refusing the voice-based features.**
- 9. Just last month, one of the CAD staff attempted to purchase a Blackberry device and service**

**contract from one of the major wireless providers. A basic Blackberry was advertised as \$299 for the device and \$29/month for a basic service plan. When the CAD staff person explained that he was Deaf and therefore only wanted text messaging, the price was increased for every voice-based feature he did not want because he could not access them. The final price quoted was \$449 for the device and \$54/month for the service. The unfairness of this situation is beyond absurdity.**

**10. Because of such blatant price discrimination on the basis of disability, Deaf people find it difficult to access telecommunications developments. Text messaging is developing into the most important communication vehicle for people who cannot hear over the phone, yet it is deliberately scale-priced to create intolerable financial burdens on people who can least afford them.**

**11. The CAD therefore presents three demands for consideration in this proceeding: (1) the 50% discount must be continued; (2) the 50% discount must be extended to all telecommunications services, whether wired, wireless, VoIP, or other; (3) text-messaging devices such as basic-model Blackberries must be provided free of charge to registered Deaf and hard of hearing clients of wireless service providers.**

**James Roots, Executive Director  
Canadian Association of the Deaf  
203-251 Bank Street  
Ottawa, ON K2P 1X3  
(613)565-2882**

**Email: [jroots@cad.ca](mailto:jroots@cad.ca)**

Ce courriel est adressé confidentiellement aux personnes nommées ci-dessus, et ne peut être distribué, copié ou révélé. Si vous avez reçu ce message par erreur, s.v.p, informez l'expéditeur et effacez ce message. Dus aux risques associés à l'Internet, nous n'assumons aucune responsabilité pour toute interception de communication Internet non-autorisée et pour transmission de virus informatiques.

This email transmission is directed in confidence to the person(s) named above, and may not be otherwise distributed, copied or disclosed. If you have received this message in error, please immediately notify the sender and delete this e-mail message. Due to the inherent risks associated with the Internet, we assume no responsibility for unauthorized interception of any Internet communication with you or the transmission of computer viruses.