6 February, 2015

To: Mr. John Traversy

Secretary General

Canadian Radio-television and

Telecommunications Commission

Ottawa, Ontario

K1A 0N2

File No. 8665-B2-201413343

Subject: Telecom Decision CRTC 2014-527, Bell Canada and Bell Mobility Inc. – Further proposals for the use of deferral account funds to improve access to telecommunications services for persons with disability – Show Cause Procedure

Dear Mr. Traversy,

1. Pursuant to your call for interventions from interested persons/organizations who wish to become parties to the show cause proceeding, the following is the position of Media Access Canada ( MAC).
2. Media Access Canada believes the current proposals are short term, backward-looking and lacking in innovation and would, therefore, be a poor use of the funds concerned. MAC believes the funds in the deferral account should be used to create a fund in the telecom area focused on issues of accessibility and access for Canadians with disabilities arising out of developments in the telecom industry. Putting these funds in the control of the accessibility community will help ensure best-of-class assistive technology solutions and prices more in line with those expected of consumer products. It would also ensure a longer-term accessibility strategy for telecom including grassroots needs analysis, product promotion and education.
3. MAC believes a Telecom Accessibility Fund, could be modeled on the Broadcast Accessibility Fund[[1]](#footnote-1) or be incorporated into that fund and earmarked for both telecom and designated regions[[2]](#footnote-2) as currently defined. This structure would ensure the involvement of the accessibility community at the decision making level and not just at the level of consultation[[3]](#footnote-3). Such consultation has had little or no impact on either the allocation of funds for, direction of, or outcome of any ILEC project to date.
4. The Bell proposal lacks a comprehensive accessibility strategy. Their handset procurement initiatives do not appropriately reflect Bell’s own ability, as a vertically integrated media company, to influence manufacturers.
5. Further, creating such a 3rd party fund would relieve the Commission of the responsibility for compliance measurement and accountability concerning the best use of the fund, putting this responsibility into the very hands of the stakeholders who should be receiving tangible benefits of funded projects[[4]](#footnote-4). We note, leaving the funds and projects in the hands of the incumbents has not produced the desired tangible benefits to date.
6. If these benefits do in fact exist, consumers are unaware of that fact. As recently as last month commission staff were unable to locate any web based promotion of accessibility initiatives that Bell was to have implemented in 2014. The accessibility community would ensure a thorough and comprehensive education and awareness campaign to ensure that consumers with disabilities can take advantage of these accessibility initiatives when they become available.
7. MAC thanks the Commission for the opportunity to suggest a more effective approach to accessibility project funding. MAC is available to appear before the Commission to expand on this proposal.

Sincerely,

Beverley Milligan

CEO, Media Access Canada

1. BAF board members who represent both broadcasters and accessibility stakeholders have strong background in the telecom sector while others have knowledge of both telecom and broadcasting. In addition the current BAF CEO has a professional background in telecom. [↑](#footnote-ref-1)
2. While the original ILEC funds were to be spent in regions where the incumbent overbilling occurred in the Bell Canada application it seems both Bell Canada and the Commission agree the projects could be national in scope, serving to meet the needs of Canadians with disabilities. [↑](#footnote-ref-2)
3. To date, Bell Canada, along with other incumbents who have enjoyed the use of these public funds have misrepresented the term consultation by insinuating that the accessibility community agrees with their initiatives and outcomes. This could not be further from the truth. [↑](#footnote-ref-3)
4. Disability community outlined the complete disregard for customer service at the recent telecom code of conduct hearings. [↑](#footnote-ref-4)