



September 20, 2006

Canadian Radio-television and
Telecommunications Commission
Les Terrasses de la Chaudière
Central Building
1 Promenade du Portage
Gatineau, Quebec
J8X 4B1

Dear Sir or Madam:

The Canadian Hearing Society (CHS) provides programs and services to enhance the independence of deaf, deafened and hard of hearing people. Established in 1940, CHS is the largest agency of its kind in Canada and with this breadth and depth of experience we are uniquely qualified to comment on the Telecom Public Notice CRTC 2006-10.

TTY (teletypewriter) users are not asking Bell Canada for special or better treatment; they are asking for equitable treatment. Removing the 50% long-distance toll discount on calls made on TTYs would impose unfair, inequitable costs. The obvious reason, which Bell Canada certainly acknowledged in the past, is that a typed conversation takes more time than a spoken conversation, to convey the same amount of information. Deaf and hard of hearing TTY users want to pay the same price to convey the same amount of information as their hearing counterparts – not less, but certainly not more.

The average rate of speech in a friendly conversation is approximately 120 – 150 words/minute. This is certainly not the speed with which the average TTY user types.

Telecommunications remains inequitable for deaf and hard of hearing TTY users due to the additional costs of purchasing expensive hardware – the TTY – which, in Ontario, is only partly subsidized by the Ontario Assistive Devices Program.

Bell Canada has been a leader in levelling the playing field for deaf and hard of hearing callers. The Bell Canada Relay Service and the 50% long-distance toll discount are evidence of such leadership. Removing this discount would be a step backwards.

Sincerely,
Kelly Murray

Director of Marketing
The Canadian Hearing Society