



Telecom Decision CRTC 2015-563

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Bell Canada and Bell Mobility Inc. – Show cause proceeding concerning the use of deferral account funds to improve access to telecommunications services for persons with disabilities

*The Commission **approves** the use by Bell Canada and Bell Mobility Inc. (collectively, the Bell companies) of the remaining \$1.6 million of deferral account funding to improve access to mobile wireless telecommunications services for persons with disabilities.*

Today's decision bolsters and expands the offer of the mobile wireless accessibility initiatives approved by the Commission in Telecom Decision 2014-527 through lower prices, longer lifecycle support, and greater availability. It also establishes within the Bell companies a program for innovation to enhance the accessibility of their mobile wireless products. As a result, Canadians living with disabilities will benefit through increased ability to access Canada's mobile wireless telecommunications system.

Background

1. In Telecom Decision 2014-527, the Commission approved the use by Bell Canada and Bell Mobility Inc. (collectively the Bell companies) of \$4.9 million of Bell Canada's deferral account fund for initiatives that improve access to telecommunications services for persons with disabilities. However, \$1.6 million of unallocated funds remained available in Bell Canada's deferral account for accessibility initiatives.
2. The Commission directed Bell Canada to show cause why it should not be required to use the remaining \$1.6 million of deferral account funds for one or more of six initiatives identified by the Commission in Telecom Decision 2014-527.¹ The Commission also asked for comment on its preliminary view that Bell Canada should be granted an exception to the guidelines² that limit the use of deferral account funds to its operating territory of Ontario and Quebec, thus allowing greater availability of the accessible technologies approved in Telecom Decision 2014-527.³

¹ See paragraph 74 of Telecom Decision 2014-527.

² As set out in Telecom Decisions 2006-9 and 2008-1, drawdowns from each incumbent local exchange carrier's deferral account were to be applied within its own traditional operating territory (Ontario and Quebec in the case of Bell Canada).

³ See paragraphs 12 to 15 and 69, and Appendix A of Telecom Decision 2014-527.

Application

3. On 19 December 2014, the Bell companies filed a response to the Commission's show cause directive, proposing the use of \$1.4 million of unallocated deferral account funds to finance four of the six initiatives set out in Telecom Decision 2014-527 and committing to implement a fifth without additional funding. The Bell companies claimed that \$1.4 million is the actual amount of unallocated funds in Bell Canada's accessibility deferral account.
4. The Commission received interventions from CNIB, Media Access Canada (MAC), and the Neil Squire Society (NSS). CNIB and the NSS generally supported the Bell companies' application, but did express concern as to the sustainability of accessibility initiatives once the deferral account funds are exhausted. MAC proposed that the unallocated funds be used to create a "Telecom Accessibility Fund," modelled on, or incorporated into, the Broadcasting Accessibility Fund.
5. The public record of this proceeding, which closed on 31 July 2015, is available on the Commission's website at www.crtc.gc.ca or by using the file number provided above.

Issues

6. The Commission has identified the following issues to be addressed in this decision:
 - Is the total amount of unallocated deferral account funds at issue in this proceeding \$1.4 or \$1.6 million?
 - Should the Commission approve the use of deferral account funds as proposed in the Bell companies' application?
 - Should the Commission uphold its preliminary view that Bell Canada should be allowed to use some of its unallocated deferral account funds to offer the technology initiatives approved in Telecom Decision 2014-527 to wireless customers outside its operating territory of Ontario and Quebec?

Is the total amount of unallocated deferral account funds at issue in this proceeding \$1.4 or \$1.6 million?

7. The Bell companies' application is premised on the use of \$1.4 million of deferral account funds, rather than the \$1.6 million set out in Telecom Decision 2014-527. They claimed that this lesser amount is the actual amount of unallocated funds remaining in the deferral account given that changes in costs associated with certain approved initiatives⁴ have occurred since Telecom Decision 2014-527 was issued.

⁴ The Bell companies cited increases in cost per license and reductions in pricing for the Mobile Accessibility App; increases in the cost per unit of Tecla Access due to product enhancements; and the addition of a second project manager (for a total of three Product Management Team members).

8. The Commission notes that the amounts allocated to the initiatives approved in Telecom Decision 2014-527 were estimates. Further, the reallocation of deferral account funds has been approved by the Commission in the past when an applicant has demonstrated that more or fewer funds were required than originally estimated for approved initiatives.⁵
9. In this instance, the Bell companies have neither provided evidence that the funding currently allocated is insufficient for initiatives approved in Telecom Decision 2014-527 nor have they demonstrated that it is necessary at this time to make changes to most of the funding for those initiatives. The Bell companies have not publically launched the approved initiatives, nor have they submitted to the Commission their first annual report⁶ that would account for actual utilization of funds (drawdowns), balances remaining, or anticipated uptake over the duration of the projects.
10. Accordingly, the Commission finds that the amount of unallocated deferral account funds at issue in this proceeding is \$1.6 million.

Should the Commission approve the use of deferral account funds as proposed in the Bell companies' application?

11. The Commission identified six initiatives in its show cause directive to the Bell companies.⁷ The Bell companies proposed to utilize unallocated funds in Bell Canada's deferral account to finance four of these six initiatives, those being to
 - publish and keep up-to-date comprehensive information on technical/user requirements and capabilities of smartphones (particularly those that support accessibility) to encourage the development of third-party accessibility solutions and applications. This could be modelled on developer support programs of providers in other jurisdictions;
 - provide the accessible Feature Phone at a price lower than that proposed by the Bell companies;
 - increase, beyond five years, lifecycle support for the accessible Feature Phone or a comparable phone at a price similar to the proposed price; and
 - put together basic packages of the Mobile Accessibility App and compatible smartphones/tablets, and the Tecla Access Solution and compatible smartphones/tablets, and offer these packages as lower-priced options.

⁵ See Telecom Orders 2009-798 and 2010-674, and Telecom Decisions 2010-679 and 2011-384.

⁶ As directed by the Commission in paragraph 78 of Telecom Decision 2014-527

⁷ See footnote 1.

Publish and keep up-to-date comprehensive information on technical/user requirements and capabilities of smartphones (particularly those that support accessibility) to encourage the development of third-party accessibility solutions and applications

12. This initiative would establish within the Bell companies a “Third-party Application (App) Developer Program” to support the innovation of new third-party accessibility apps and assistive technologies compatible with the mobile wireless smartphones and devices offered by the Bell companies.
13. The Bell companies proposed the use of \$0.2 million over a five-year period for a program that would facilitate the creation and maintenance of technical user documents to be identified by the Commission. The Bell companies submitted that this initiative offers excellent potential to spur long-term growth in the Canadian accessibility space, and that it can be integrated into existing vendor and third-party support programs to create new accessibility solutions and apps in the future. The Bell companies stated that they would liaise with carriers and third-party vendors including those in other jurisdictions to better understand how to develop this program.
14. CNIB and the NSS supported a Third-party App Developer Program as a high priority program for developing and sustaining the ecosystem of accessibility apps and assistive technologies in the rapidly evolving Canadian telecommunications system. They also supported an increase to the funding for this program, specifically to expand it to include activities that would proactively engage third-party developers and increase their awareness of the interfaces available for accessibility development on the smartphones offered by the Bell companies. The NSS asserted that a proactive approach is both necessary for effectiveness of the program and consistent with how wireless service providers in other jurisdictions manage similar programs which are not passive in nature.
15. The NSS cited several examples of proactive approaches that have been used by other organizations for third-party innovation and recommended that these should be included in this program: advertising, conferences, contests and cash prizes,⁸ accessibility hackathons,⁹ events,¹⁰ and partnerships.¹¹ The Bell companies did not comment on the NSS’ proposed approach to expand the program.

⁸ Modelled on the Vodafone Foundation Smart Accessibility Awards, a cash prize for the development of information communications technologies (ICTs) designed to improve the lives of persons with disabilities. See http://www.aegis-project.eu/index.php?option=com_content&view=article&id=142&Itemid=25.

⁹ In the manner of AT&T’s Hackathon, which offers cash prizes in multiple categories. See <http://connectability.challengepost.com/>.

¹⁰ Random Hacks of Kindness, held in Ottawa, Toronto, etc. (see <http://rhok.ca/>) and the national and international developer promotion events held by the Wireless Industry Partnership (a Canadian organization) for companies in the wireless industry to engage developers (see <http://wip.org/>).

¹¹ For example, with Wavefront, a national government-sponsored organization that acts as an accelerator for Canadian wireless start-up companies.

16. The Commission considers that a Third-party App Developer Program devoted to improving the accessibility of the Bell companies' mobile wireless smartphones and devices, expanded in the manner proposed by the NSS, has the potential to encourage third-party innovation that can benefit both Canadians living with disabilities and the Bell companies by raising awareness of their wireless products and services. The Commission thus considers it appropriate to allocate an additional \$0.2 million to expand this program in the manner proposed by the NSS for a total of \$0.4 million. This additional \$0.2 million is the difference between the \$1.4 million put forward by the Bell companies and the \$1.6 million identified by the Commission.
17. While the Bell companies premised their proposed program on including a role for the Commission with respect to "identifying technical/user documents," the Commission considers this activity to be best fulfilled by the Bell companies' administrator of the program who should have the requisite familiarity with the Bell companies' wireless products and services and the established relationships with vendors and carriers including those in other jurisdictions.
18. Accordingly, the Commission **approves** the use of \$0.4 million of Bell Canada's deferral account funds to establish a Third-party App Developer Program, expanded in the manner described by the NSS and devoted to improving the accessibility of the Bell companies' mobile wireless smartphones and devices. The Commission **directs** Bell Canada to provide a plan for this program, which would include the following information, in its next annual Deferral Account report (March 2016) to the Commission to fully utilize the allocated amount of \$0.4 million by the end of 2019.
- the number and type of accessibility contests and prizes;
 - the number and type of accessibility hackathons;¹²
 - the number and type of accessibility partnerships;
 - the number and type of accessibility events; and
 - a communications plan and strategy to proactively promote the events and engage third-party apps developers.

Provide the accessible Feature Phone at a price lower than that proposed by the Bell companies

19. As part of this process, the Bell companies identified the Doro Claria and the Doro Liberto smartphones as their solution for the accessible Feature Phone approved by the Commission in Telecom Decision 2014-527,¹³ submitting evidence that demonstrated how the Doro phones meet the accessibility requirements set out in that decision. While the companies recognized that the Doro phones are smartphones, as

¹² In this context, the term hackathon means events that result in techniques that increase accessibility efficiencies or benefits in all walks of life.

¹³ While the Commission approved the accessible Feature Phone initiative in Telecom Decision 2014-527, the Bell companies had not identified a specific accessible feature phone at the time when the decision was issued but had committed to working with at least one major handset manufacturer.

opposed to feature phones, they supported this choice noting the advantages of a smartphone in a marketplace of growth and the decline worldwide in the production, availability, and support of feature phones.

20. The Bell companies proposed to use \$0.8 million of Bell Canada's deferral account funds to subsidize and offer the Doro Claria and Doro Liberto phones at a lower price when purchased with either a voice-and-data plan or a voice-only plan until all of the allocated funds are used up.
21. Both CNIB and the NSS supported this use of deferral account funds as a way to provide affordable accessible mobile wireless solutions to the Bell companies' customers with disabilities. CNIB suggested that the lower prices can improve the uptake of the Bell companies' mobile technology while enabling Canadians who are blind, deaf-blind, or living with significant vision loss to leverage the benefits of the digital age.
22. The Commission notes that while the Doro phones are smartphones as opposed to the accessible Feature Phone approved in Telecom Decision 2014-527, the record of this proceeding shows that the Doro phones offer the requisite accessibility functions of the approved Feature Phone.¹⁴ While it cannot be expected that a smartphone can be priced the same as a lower-end accessible feature phone with less functionality, the Commission considers that the Bell companies have provided a reasonably priced accessible smartphone within the affordable range envisioned for the accessible Feature Phone.
23. In light of the above, the Commission **approves** the use of \$0.8 million of Bell Canada's deferral account funds to subsidize the Doro phones to offer them at a lower price as set out in the Bell companies' submission.

Increase, beyond five years, lifecycle support for the accessible Feature Phone or a comparable phone at a price similar to the proposed price

24. The Bell companies proposed the use of \$0.2 million of deferral account funding to evaluate and test a new phone from those that would be available on the market in the 2019 time frame. This new phone would be similar in nature to the Doro phones and priced similarly; any remaining funds, including those left over from the five-year Doro program, would be used to subsidize it.
25. The NSS submitted that while it is difficult to determine the feature set of mobile wireless handsets five years into the future given the rapid churn in technology, it is important to keep in mind the purpose of this particular accessible phone, i.e., to ensure that people with visual disabilities have a phone with a tactile keyboard and compatibility with Interactive Voice Response (IVR) systems as an alternative to

¹⁴ See Appendix A of Telecom Decision 2014-527.

iPhone touchscreen smartphones.¹⁵ The NSS pointed out that while technology may change, the “use case” that helps to define the operational user needs and features does not. The NSS asserted that by including the appropriate “use cases” in their product procurement processes, the Bell companies can continue to procure and sustain smartphones into the future that meet the above purpose for people with visual disabilities.

26. CNIB supported the NSS’ view, noting that “being wed to a particular device” is short-sighted given the rate at which devices become obsolete. Both parties also noted that the handset manufacturers (the Bell companies’ suppliers) are actively working on smartphone features and solutions for compliance with the accessibility requirements of the *Twenty-First Century Communications and Video Accessibility Act* (CVAA) in the United States, and thus suggested that the Bell companies leverage this current situation to better offer accessible mobile wireless choices to their customers living with disabilities.

27. As stated in Telecom Decision 2014-527, the Commission expected Bell Canada to fully utilize its deferral account funds within the five-year period ending in 2019. The Bell companies have instead proposed a solution that entails waiting until the post-2019 time frame to use the allocated funds. The Commission is not convinced that it is necessary to wait until 2019 to begin this initiative. In fact, the Commission considers that the record of this proceeding shows that the present time is a more appropriate time to begin the procurement process of the comparable phone for a number of reasons including

- it coincides with the current situation in the United States where the handset manufacturers are complying with the accessibility requirements of the CVAA which presents the Bell companies with an opportunity to leverage their access to deferral account funds to acquire from their suppliers accessible solutions resulting from CVAA implementation and offer these to their customers with disabilities; and
- as demonstrated in the lag between 2014 (when the Commission approved the accessible Feature Phone) and the introduction in 2016 of the Doro phones, a longer lead time is required by the Bell companies for introducing accessible products funded by deferral account monies.

28. In light of the above, the Commission **approves** the Bell companies’ use of \$0.2 million to ensure the availability beyond five years (post-2019) of the lifecycle support of a mobile wireless phone accessible by people with visual disabilities that is comparable to, and priced similar to, the Doro phones. The Commission **directs** Bell Canada to (i) revise its time frame so that this initiative begins now and utilizes the funds by 2019, and (ii) adopt a “use case” approach to develop, in consultation with

¹⁵ As set out in Telecom Decision 2014-527, the proposed device has a simple user interface with a tactile three-key-by-four-key keypad, differentiated keys, and shortcuts to access commonly used features, and is compatible with IVR systems.

persons with disabilities, the appropriate use cases to be used to procure the successor(s) to the Doro phones to be offered in the post-2019 time frame. Any deferral account funds left over after implementation of the initiatives approved in this decision should be applied to this initiative to ensure continuity of accessible mobile wireless smartphones that meet the needs of the Bell companies' customers with disabilities at a lower price.

Put together basic packages of the Mobile Accessibility App and compatible smartphones/tablets, and the Tecla Access Solution and compatible smartphones/tablets, and offer these packages as lower-priced options

29. The Bell companies proposed the use of \$0.2 million of deferral account funds to create "accessibility packages" that contain the Mobile Accessibility App or the Tecla Access Solution and a compatible smartphone or tablet, offered at lower prices relative to the purchase of the package components separately. The Bell companies submitted that these packages will assist in reducing the technological and socio-economic barriers faced by their customers with disabilities through affordable assistive products and useful accessible solutions.
30. The Bell companies also indicated that they require additional time to report on the specific costs, prices, and timelines associated with this initiative, but confirmed that they would do this in their next annual Deferral Account report to the Commission.
31. Both CNIB and the NSS supported this proposed use of deferral account funds, acknowledging that the Bell companies would be developing affordable accessible mobile wireless solutions for their customers with disabilities.
32. The Commission **approves** the use of \$0.2 million of deferral account funds for this initiative and **directs** Bell Canada to address the details associated with this initiative, as described in paragraphs 29 and 30 above, when it files its annual Deferral Account report with the Commission in March 2016.

Other initiatives not being funded

33. The Bell companies did not propose to allocate funds to the other two initiatives listed in Telecom Decision 2014-527. However, they did commit to implementing one of the proposals, by including the Universal Service Bus On-the-Go (USB OTG) feature in their procurement documents for at least five years. The USB OTG is a feature available on some smartphones that allows users to connect a peripheral pointing device (e.g. a mouse, joystick) for the purpose of operating the smartphone. It thus provides an accessible solution for people with moderate mobility disabilities. The Bell companies stated that they do not require deferral account funds for this purpose as most of their upcoming smartphones will be equipped with USB OTG technology.
34. The NSS strongly supported the inclusion of USB OTG technology as a product requirement in the Bell companies' procurement documents for five years. However, the NSS pointed out that USB OTG smartphones that are accessible in the manner described above are those that include the full Human Interface Device (HID)

profile,¹⁶ an example being the Samsung Galaxy S4 currently offered by the Bell companies. The NSS also pointed out that the Bell companies' submission lacks the detail to demonstrate to the Commission that their procurement documents to their suppliers will include the full HID profile to ensure that the upcoming USB OTG smartphones will indeed be accessible.

35. The Commission is of the view that inclusion of the full HID profile as a product requirement for USB OTG smartphones in the Bell companies' procurement documents is important to ensuring the continuity of accessible smartphones of this kind in their upcoming product offerings. Should this feature be inadvertently dropped, the Commission is concerned that customers with disabilities could lose an accessibility solution upon which they have grown to depend.
36. Accordingly, the Commission **requests** Bell Canada to procure and offer accessible USB OTG smartphones that include the full HID profile to provide and sustain an accessible solution for its customers living with moderate mobility disabilities. The Commission **directs** Bell Canada to report the status of these accessible USB OTG smartphones in its inventories in its annual Deferral Account report to the Commission.

Should the Commission uphold its preliminary view that Bell Canada should be allowed to use some of its unallocated deferral account funds to offer the technology initiatives approved in Telecom Decision 2014-527 to wireless customers outside its operating territory of Ontario and Quebec?

37. In Telecom Decision 2014-527,¹⁷ the Commission asked for comment on its preliminary view that Bell Canada should be permitted to use some of its unallocated deferral account funds to offer outside of its operating territory of Ontario and Quebec the Technology initiatives approved by the Commission in that decision. In upholding its preliminary view, the Commission would be granting an exception to the guidelines set out in Telecom Decision 2006-9 that would limit Bell Canada's use of its deferral account funds to its operating territory of Ontario and Quebec.
38. The Commission noted in its preliminary view that mobile wireless telecommunications services are provided by Bell Mobility Inc. across the country. The Commission was thus concerned that a percentage of that company's wireless subscribers with disabilities would not benefit from the wireless initiatives approved by the Commission since they reside outside of Ontario and Quebec.
39. The Bell companies, CNIB, and the NSS supported the Commission's preliminary view. The Bell companies submitted that this approach would ensure that their customers with disabilities that reside in other areas can also benefit from accessible wireless technologies at a small incremental cost increase. The NSS submitted that

¹⁶ The full HID profile defines the protocols, procedures, and features to support keyboards, pointing devices, gaming devices, and remote monitoring devices.

¹⁷ See paragraphs 68 to 71 of Telecom Decision 2014-527.

the Bell companies' wireless services are national in scope as are the needs of Canadians living with disabilities. CNIB submitted that expanding the potential market would likely increase the long-term sustainability of accessible technology-based solutions.

40. In light of the above, the Commission upholds its preliminary view and grants Bell Canada an exception to the guidelines that would allow the Bell companies to offer the Technology initiatives¹⁸ approved in Telecom Decision 2014-527 to their customers with disabilities that reside outside of Ontario and Quebec.

Other matters

Use of deferral account funds for a Telecom Accessibility Fund

41. As noted earlier in this decision, MAC proposed that the unallocated deferral account funds in Bell Canada's deferral account should be used to create a "Telecom Accessibility Fund," modelled on, or incorporated into, the Broadcasting Accessibility Fund.
42. The Commission finds that the uses for the funds as approved above are more amenable to immediate implementation than those proposed by MAC.

Reporting

43. In Telecom Decision 2014-527, the Commission directed Bell Canada to report to it, as follows, with respect to the initiatives approved in that decision:
- within 30 days of the date of that decision, the date on which Bell Canada would begin the implementation of each of the initiatives approved by the Commission in that decision, and
 - beginning in 2015 and until the deferral account funds are full used, an annual report, by 31 March each year, with details regarding the initiatives implemented in the previous year and lifecycle matters.
44. Consistent with this reporting structure, the Commission **directs** Bell Canada to include details concerning the initiatives approved in this decision, with all supporting documentation required as a result of its determinations in this decision, in Bell Canada's annual Deferral Account report filed with the Commission.

Full utilization of the funds in Bell Canada's deferral account

45. As outlined in Telecom Decision 2014-527, the Commission expected that the funds in Bell Canada's deferral account would be fully used within the five-year period ending in 2019. Consistent with this expectation, the Commission **directs** Bell Canada to ensure that all funds from its deferral account are fully allocated for use by

¹⁸ See Appendix B of Telecom Decision 2014-527.

the end of 2019 in a manner that provides for the five-year lifecycle period for initiatives as approved by the Commission in Telecom Decision 2014-527 and the availability and support for beyond five years of the successor(s) to the Doro phones approved in paragraph 28 of this decision.

Summary of the Commission's determinations

46. A summary of the Commission's determinations is set out in the Appendix to this decision.

Secretary General

Related documents

- *Bell Canada and Bell Mobility Inc. – Further proposals for the use of deferral account funds to improve access to telecommunications services for persons with disabilities*, Telecom Decision CRTC 2014-527, 8 October 2014
- *TELUS Communications Company – Request for a further drawdown from its deferral account for accessibility initiatives*, Telecom Decision CRTC 2011-384, 20 June 2011
- *TELUS Communications Company – Request for an additional drawdown from its deferral account for accessibility initiatives*, Telecom Decision CRTC 2010-679, 10 September 2010
- *Bell Aliant Regional Communications, Limited Partnership and Bell Canada – Follow-up to Telecom Order 2009-798 regarding the Voice Dialing feature*, Telecom Order CRTC 2010-674, 8 September 2010
- *Bell Canada and Bell Aliant Regional Communications, Limited Partnership – Voice Dialing feature*, Telecom Order CRTC 2009-798, 22 December 2009
- *Use of deferral account funds to improve access to telecommunications services for persons with disabilities and to expand broadband services to rural and remote communities*, Telecom Decision CRTC 2008-1, 17 January 2008
- *Disposition of funds in the deferral accounts*, Telecom Decision CRTC 2006-9, 16 February 2006

Appendix to Telecom Decision CRTC 2015-563

Summary of the Commission’s determinations in this decision with respect to the use of the \$1.6 million remaining in Bell Canada’s deferral account for accessibility initiatives

Initiative	Proposed deferral account drawdown (\$ millions)	Commission’s determination
Establish within the Bell companies a Third-party App Developer Program”	0.2	Approved, with changes (a total of \$0.4 million is allocated to this project, ¹⁹ and detailed reporting required in the next Deferral Account report (March 2016))
Provide the accessible Feature Phone ²⁰ at a lower price (subsidize Doro Claria and Doro Liberto smartphones offered in plans)	0.8	Approved
Increase beyond five years the lifecycle support for the Accessible Feature phone or a comparable phone at a similar price	0.2	Approved (directs Bell Canada to revise its time frame and adopt a “use case” approach)
Put together basic packages that contain the Mobile Accessibility App or the Tecla Access Solution ²¹ and a compatible smartphone or tablet offered at a lower price (the Bell companies indicated that they needed additional time and would report on specific costs, prices, and timelines in the next Deferral Account report (March 2016))	0.2	Approved (directs Bell Canada to report on costs, prices, and timeline details in the next Deferral Account report (March 2016))

¹⁹ The additional \$0.2 million to be allocated to the Third-party App Developer Program (see paragraph 16 of this decision), together with the approved funding for the initiatives proposed by the Bell companies, results in a total amount of funding from Bell Canada’s deferral account of \$1.6 million for the initiatives approved in this decision.

²⁰ For details, see Appendix B of Telecom Decision 2014-527.

²¹ Ibid.

Offer and support a smartphone with USB OTG technology for at least five years	0.0	Requests Bell Canada to procure and offer accessible USB OTG smartphones that include the full HID profile, and directs it to report the status of these accessible USB OTG smartphones in its inventories in its annual Deferral Account report
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