



**Department of Broadband, Communications and the Digital
Economy**

**Review of access to telecommunication services
by people with disability, older Australians and
people experiencing illness**

July 2011

Joint Submission by:

Communications Alliance
and the
**Australian Mobile Telecommunications
Association**

August 2011

1. Introduction

- 1.1 The Australian Mobile Telecommunications Association (**AMTA**) is the peak industry body representing Australia's mobile telecommunications industry. Its mission is to promote an environmentally, socially and economically responsible, successful and sustainable mobile telecommunications industry in Australia, with members including the mobile Carriage Service Providers (**CSPs**), handset manufacturers, network equipment suppliers, retail outlets and other suppliers to the industry. For more details about AMTA, see <http://www.amta.org.au>.
- 1.2 Communications Alliance is the primary telecommunications industry body in Australia. Its membership is drawn from a wide cross-section of the communications industry, including service providers, content providers, vendors, consultants and suppliers. Its vision is to provide a unified voice for the telecommunications industry and to lead it into the next generation of converging networks, technologies and services. The prime mission of Communications Alliance is to promote the growth of the Australian communications industry and the protection of consumer interests by fostering the highest standards of business ethics and behaviour through industry self-governance. For more details about Communications Alliance, see <http://www.commsalliance.com.au>.
- 1.3 Communications Alliance and AMTA (**the Associations**) welcome the opportunity to provide input to the Department of Broadband, Communications and the Digital Economy's Review of access to telecommunications services by people with disability, older Australians and people experiencing illness.
- 1.4 In this submission, references to "people with disability" should be taken to include "older Australians and people experiencing illness". However, we include older Australians and people experiencing illness in so far as their illness or age means that they have actual accessibility requirements in relation to telecommunication services or products. That is, the Associations do not believe that all "older Australians" or "people experiencing illness" will necessarily have requirements relating to the accessibility of telecommunication services. Without a clearer definition, the phrase "people experiencing illness" can normally be understood to include a person who is suffering from the common cold. Likewise, "older" is a relative term that has not been clearly defined for the purposes of this review. The Associations are assuming that what is intended here is to include people who are either experiencing a chronic or temporary illness that impacts on their ability to access telecommunication services or that their age means they have specialised accessibility needs. The Associations note that most older Australians or people experiencing illness will not have difficulties accessing telecommunications services although they may have a requirement to ensure

continuity of service and prioritisation of fault repairs due to life-threatening health reasons and that programs (outside the scope of this review) exist to ensure such prioritisation.

2. Summary - the Accessibility of Telecommunications Services

- 2.1 Telecommunications play a vital role in the day to day life of all Australians. Not only do they allow us to stay in touch, but they allow access to educational resources and government services as well as open up access to employment.
- 2.2 There are now more mobile subscriptions in Australian than people with a take-up rate of approximately 125% of the population. This high rate of take-up is due to people having multiple mobile subscriptions for work and personal use as well a trend towards people replacing fixed line communications services with mobile only.¹ Further, around 45% of mobile phone owners now have a smartphone and it is predicted that the percentage of smartphone owners will increase to 60% by the end of 2011. ²The ACMA's recent research into internet use by Australians found that there were 10.4 million active internet subscriptions at the end of December 2010, including fixed and mobile wireless subscriptions. They also found that there were 8.2 million internet subscribers who used their mobile handsets to access the internet.³
- 2.3 For people with disabilities telecommunications services can alleviate social isolation and in many cases act as a lifeline allowing them to keep in touch with family, friends and support services. It is therefore imperative that phones, mobile devices and other communications equipment have features for accessibility and that we continually improve upon these features as technology advances. A "universal design" approach as outlined in the government's National Disability Strategy is important in ensuring that devices are accessible.⁴ The principles of universal design are based upon ensuring that mainstream products and services are designed with accessibility requirements in mind.
- 2.4 Rapid changes in technology and convergence trends have exciting implications for people with disabilities. A vast array of Internet based applications, such as Skype, which allows for video calling, and smartphone technologies that provide

¹ Budde "Australia's \$17bn mobile industry hits 125% penetration" 27 July 2011
www.buddeblog.com.au

² Telstra's Smartphone Index, 11 July 2011

³ ACMA "The internet service market and Australians in the online environment" 5 July, 2011

⁴ National Disability Strategy 2010-2020, An Initiative of the Council of Australian Governments

access to GPS and social media, allow all Australians, including people with disabilities, to communicate using mainstream telecommunications services. Australia enjoys a very competitive market with devices and call plans at many price points from entry level to high end devices and “all you can eat” plans for the provision of these services.

- 2.5 Technological advances have also meant that features that were once specialised have become standard on most equipment. For example, volume controls, speaker phones and cordless phones. In addition, many mobiles now include speech recognition, text to speech, visual/vibrate alerts, adjustable user interfaces, touch screens and on-screen keyboards to name but a few. Similarly, there is an increased capability for equipment and devices to be customised by individual users through the addition of specialised applications. These technological advancements mean that services for people with disabilities no longer need to couple specialised equipment with a specialised telecommunications service, as occurs with TTYs. This affords greater scope for affordable mainstream telecommunications services to be accessed and exploited by people with disabilities. For example, the use of SMS, MMS, video telephony and video messaging by deaf/Deaf communities.
- 2.6 While noting that mainstream telecommunications services can increasingly meet the needs of people with disabilities, the Associations also recognise that customer equipment manufacturers have made significant efforts to design equipment with accessibility in mind and that there is a wide range of devices available that have functions designed to enable accessibility. For example, Nokia has a range of mobile phones that include inbuilt speech output for SMS and other functions, voice commands and zoom text.⁵ Apple’s iPhone range also has inbuilt screen reader/voice output, zoom text and voice command capabilities.⁶ Many android smartphones also have some of these capabilities. Similarly, Optus offers the Doro 312C which is a large button handset with volume control, Superprint 4425 and Uniphone 1150 which are both TTY phones. And there are many other models of fixed line handsets that provide large buttons, voice to text prompts, volume control and display screens that are available in the general retail market as well as through the various disability equipment programs provided by the carriers. It is notable that these products are mainstream devices that have been designed under the “universal design” approach where accessibility has been part of an overall design strategy.

⁵Nokia Accessibility Guide <http://www.nokia.com.au/about-nokia/community/accessibility>

⁶ Apple Accessibility website <http://www.apple.com/iphone/features/accessibility.html>

- 2.7 Any regulatory framework for the supply of customer equipment to people with disabilities must be flexible and allow for the use of mainstream telecommunications services as well as anticipate emerging technologies and equipment that will be able to meet the requirements of people with disabilities.
- 2.8 A framework that is built around a specific proprietary piece of equipment or technology (for example, TTY or CapTel Captioned Telephony phones or video calling using proprietary equipment) should be avoided as it could potentially limit the benefits available to people with disabilities from more widely available emerging technologies and will likely end up costing more. Open source based technologies are preferable to any proprietary based solutions.
- 2.9 Suitable equipment for people with disabilities does appear to emerge from the US and European markets. Generally speaking, Australia tends to adopt telecommunications products that are designed and manufactured overseas. Specialist providers in Australia can also make a valuable contribution. Telstra's Easy Touch Discovery and Easy Call mobile phones were designed and tested with input from disability consumer advocacy groups to have a range of accessible features. Availability of customer equipment solutions appears to be less of an issue; rather it is the affordability of some customer equipment and associated applications that can pose difficulties for people with disabilities.
- 2.10 Technological convergence means that past distinctions between desk top computers, portable computers and mobile phones are becoming blurred with the emergence of smartphones, tablets and devices designed to interact with cloud based applications. Devices may be used for multiple purposes – a tablet could be used as a navigation aid, a personal organiser, an electronic book, a music player and a communications device. The same device may also be used for personal or business purposes.
- 2.11 The Associations suggest that access to devices should be part of a holistic policy approach to overcoming any disadvantage as experienced by certain groups in society. To this end the need for government support and funding for any disability equipment program specific to telecommunications must first be considered in relation to existing social inclusion policies and programs, for example, Job Access (Employment Assistance Fund), Job Start, existing pension schemes or the proposed National Disability Insurance Scheme recently recommended by the Productivity Commission.⁷

⁷ Disability Care and Support, Productivity Commission Inquiry Report, No.54, 31 July 2011

- 2.12 Including any disability equipment program or scheme in the abovementioned programs will ensure that there is a fairer and broader basis for funding of the scheme as funds will be drawn from consolidated government revenue raised through Australia's broad-based taxation framework and not raised via levies on telecommunications service providers.
- 2.13 There are also advantages apparent for the end user in having fixed and mobile devices that will enable:
- access to the same range of personal computing, navigation and other applications,
 - utilisation of the same telecommunications services and
 - use of any personally adapted assistive devices.
- 2.14 The Associations' view is that Government funding from consolidated revenue for devices should take a holistic approach to access across all of the functionality required by people with disabilities. Devices, or underlying funding, should be distributed to people with disabilities through the recommended National Disability Insurance Scheme or the existing Job Access Employment Assistance Fund. This would be both more efficient and easier for people with disabilities as it would cut down on bureaucratic points of contact by removing the need for them to apply to a range of parties, including their telecommunications provider, for equipment. Further the Productivity Commission specifically recommended in its report that communication aids should be provided through the proposed National Disability Insurance Scheme.⁸
- 2.15 The Associations note that customer equipment portability is a feature of a competitive telecommunications environment. People with disabilities should be given equivalent opportunity to own their devices. This suggests less emphasis on customer equipment rental from CSPs and greater opportunities for equipment supply via specialist suppliers. Further, such specialist suppliers will be better placed to understand the features of the equipment, the particular needs of their customers and carry a greater range of devices.
- 2.16 The Associations agree that the National Relay Service (NRS) provides a valuable service in allowing deaf/Deaf or hearing/speech impaired Australians to enjoy the same end-to-end connectivity as other Australians and communicate by telephone with others via the assistance of the NRS and its relay officers. The most recent NRS performance report shows that almost 9000 Australians use the

⁸ Ibid. Executive Summary p7

NRS per month (this includes people using the NRS to contact people who are deaf/Deaf, hearing-impaired or speech-impaired).⁹ The performance report also shows that internet relay calls are continuing to increase as a percentage of total calls (to almost 40% of outbound call minutes), while overall call minutes have continued to decline due to the increased popularity of other text-based mainstream communication methods such as email, SMS and instant messaging.¹⁰

- 2.17 There is clearly an understandable preference for communications that allow for real-time interactions and do not rely on a third-party. However, the Associations note that although technologies such as email, instant messaging and SMS may enable communications between people with disabilities and their friends and family they are not always perceived to be appropriate for communication with others such as doctors, schools and government agencies. And sometimes these organisations do not make these methods available. However, it should be noted that there is considerable scope for businesses, institutions and government agencies to increase their accessibility by extending the means by which people can contact them. For example, Optus recently won a Communications Alliance “Commitment to Customer Service” award for their online chat and social media services. Vodafone Hutchison Australia (VHA) has offered customer support via social media and online chat since the beginning of 2011 and Telstra has also recently introduced social media as another means by which customers can contact Telstra for customer service inquiries.
- 2.18 While the NRS is funded through a levy on eligible telecommunications carriers, industry does not play a role in the governance of the NRS or its associated outreach service. The Associations suggest that the NRS could potentially be run more efficiently and effectively if they were in closer and regular consultation with industry, including consultation regarding the impact of emerging technologies. Further, there would be greater opportunity for innovation if industry-based technology planning and development were to be factored into NRS strategy and planning.
- 2.19 The Associations’ view is that the Government should look closely at analysis undertaken by Ofcom in the UK in relation to video relay services as well as conduct its own thorough cost-benefit analysis before making any recommendation to extend NRS services to include video relay.¹¹

⁹ National Relay Service, Performance Report 2009-10 (ACMA) p5

¹⁰ Ibid p4

¹¹ Ofcom, Review of Relay Services, 28 July 2011

- 2.20 Such an analysis should also consider alternatives to video relay such as IP based applications, for example Skype, that allow for video calling. Noting that while such services do not currently allow for full end-to-end connectivity (they rely on the person at either end having the same service and may still require an interpreter) and so have limitations, they do still have potential for use by deaf/Deaf Australians (who use Auslan) that should be explored further.
- 2.21 Video calling is an emerging technology from a highly competitive market where innovations are continuing to abound. There are readily available android based mobile handsets, for example Samsung's Galaxy SII, which now have video calling capability that can be realised on 3G or 4G mobile networks. Apple's iPhone 4, iPad (which is a tablet rather than a phone), latest iPod Touch and Macs also have video calling capability (FaceTime) which can be used between Apple users. It is rumoured that the next generation of Apple's iPhone will also include video calling.¹² Similarly, there are several IP based video calling applications, such as Skype, which are freely available to anyone with internet access and readily affordable equipment (web cameras). It is anticipated that the NBN will extend broadband to Australian residences and therefore facilitate greater access to such IP based video calling applications. It would be premature for industry or the government to advocate any proprietary based video calling solution at this point in time or to attempt to impose inter-working arrangements on the various video calling solutions currently available in the market. The Associations anticipate that the high level of competition and innovation in this market fuelled by consumer demand for these services will lead to both improved and widespread services in the near future, especially as the NBN and next generation of mobile broadband networks are rolled out.
- 2.22 Industry has been working with the Department of Broadband, Communications and the Digital Economy to investigate the feasibility of introducing the capability to send SMS to 106 (the emergency call number administered by the NRS). This work has been undertaken in parallel with the department's initiative to develop a smartphone application that would allow access to 106. Industry supports the development of a smartphone application and believes that it is a valuable initiative that should be pursued. While the implementation of SMS to 106 is technically feasible within certain limitations and constraints it needs to be understood that SMS is an established legacy technology that has limitations as a long term solution for access to emergency services. The costs of implementing any capability need to be weighed against potential benefits.

¹² iPhone 5 rumours: what you need to know, Techradar.com

3. Accessibility Partnerships and Initiatives

- 3.1 The Associations both have programs that include a specific focus on accessibility issues. On behalf of industry members, the Associations seek to identify, develop and promote the accessibility of telecommunications products and services (including mobile services) for all Australians.
- 3.2 AMTA's program includes an Accessibility Committee which aims to:
- Increase members' awareness of innovation, developments and trends in accessibility and disability policies, strategies, initiatives and issues arising both in Australia and overseas
 - Ensure that accessibility for people with disabilities is part of AMTA's consideration of all issues
- 3.3 Through its Accessibility Committee, AMTA has developed and published a *Mobile Phone Industry Good Practice Guide: Accessibility for People with Disabilities*. AMTA has also developed a range of useful information about the accessible features of mobile handsets and other devices to assist Australians with disability to choose mobile phones that meet their specific needs and budgets.
- 3.4 The Mobile Manufacturers Forum (MMF) is an international association of telecommunications equipment manufacturers with an interest in mobile or wireless communications. Most recently, the MMF launched the Global Accessibility Reporting Initiative (GARI). The GARI project includes a website (www.mobileaccessibility.info) that provides people with disabilities or accessibility needs to source information about mobile handsets and choose a device that most appropriately meets their needs.
- 3.5 AMTA's website (www.amta.org.au) links to the GARI website and also contains a Disability Access section that includes tips and help on how to make and manage calls, and how to make physical, visual, auditory and other tasks easier.
- 3.6 The Newell Network – www.newell.org.au – is also a valuable resource for people with disabilities to access information about appropriate telecommunications services and equipment to meet their needs. This website is particularly useful for people with complex or multiple communication needs.

- 3.7 The Communications Alliance (<http://www.commsalliance.com.au>) accessibility publishing program includes:
- the development and publishing of the ***Information on Accessibility Features for Telephone Equipment Industry Code*** (C625:2009) which specifies obligations on equipment suppliers to provide product information on the accessibility features of their products which may assist in meeting people's communications needs. A brochure on guidance for phone manufacturers and importers (such as Nokia, Samsung, Motorola and Panasonic) in providing information on the accessibility features of telephone equipment has also been developed to assist them in understanding their responsibilities.
 - the accompanying ***Operational Matrices for Reporting on Accessibility Features for Telephone Equipment Industry Guideline*** (G627:2009) which provides a list of features for fixed and mobile phones that equipment suppliers must provide to meet the Code obligations. Phone manufacturers and importers typically provide completed matrices of their handsets on their product websites.
 - the ***Disability Matters: Access to Communication Technologies for People with Disabilities and Older Australians Guideline*** (G586:2006) which outlines considerations for industry participants to ensure that the communication needs of people with disabilities and older people continue to be met in the current and emerging communications environments. It is intended to act as an underlying set of guidelines for consideration in all Communications Alliance activities and those of industry participants, and is for the information of consumers with a disability.
 - the Requirements for ***Customer Equipment for use with the Standard Telephone Service — Features for special needs of persons with disabilities Standard*** (S040) which specifies the features of the telephone products that are designed to cater for those with disabilities.
- 3.8 The *Operational Matrices for Reporting on Accessibility Features for Telephone Equipment Industry Guideline* is presently undergoing a periodic revision to ensure that it remains current and improves its usefulness.
- 3.9 In addition to matrices in the Guideline, mobile handset manufacturers are using the GARI (<http://www.mobileaccessibility.info>) as a means in providing accessibility information and complying with the Code. The GARI is managed by the Mobile Manufacturers Forum (MMF) (<http://www.mmfi.org>) and is an online searchable database listing accessibility features of handsets. Communications

Alliance and the MMF work together to ensure that the mobile handset information in the Guideline and the GARI align, to ensure that people seeking to compare the accessible features of mobile phones whose manufacturers use GARI and those whose manufacturers use the Industry Guideline G627:2009 can do so by searching for the same accessibility features.

- 3.10 It is important to ensure that people with disabilities are made aware of available information. The Associations are keen to promote the Accessibility Information Code and Guideline and GARI but at the same time note that shopfront inquiries concerning accessibility features of phones are low. There may be a useful role for consumer organisations such as ACCAN, which has relationships with the various disability advocacy groups and disability service providers, and through those groups/providers, to the broader disability community, to raise awareness of available accessibility information including that of the GARI website.

4. Legislative and Regulatory Framework

- 4.1 The Australian Government has a number of departments and agencies dealing with aspects of social inclusion policies such as the National Disability Strategy. In addition the Government is a signatory to the United Nations Convention on the Rights of Persons with Disabilities which includes a specific reference (Article 9) to information, communities and other services.
- 4.2 ***The Disability Discrimination Act 1992 (DDA)*** applies to members of the telecommunications industry as it does to anyone providing goods and services in Australia. The DDA prevents discrimination on the basis of disability in Australia. Compliance with the DDA informs CSPs' and manufacturers' product development and service delivery through all phases from design to launch as well as various disability equipment schemes provided by the telecommunication carriers.
- 4.3 ***Telecommunications (Consumer Protection and Service Standards) Act 1999 (Cth) (TCPSS)*** provides for consumer protections such as the universal service obligations, access to a standard telephone service, untimed local calls, participation in the TIO scheme and the NRS. This legislation ensures people with disabilities are able to get access to equipment (if required) so that they can enjoy reasonable access to the equivalent of a standard telephone service. Under current USO obligations, Telstra is the universal service provider and therefore must give its customers the option of leasing equipment appropriate to their needs.

- 4.4 The **Telecommunications (Equipment for the Disabled) Regulations 1998** specifies features and equipment that must form part of or be available with a standard telephone service. These regulations also set out the requirements for the provision of equipment to access NRS services, for example modems, TTY or Braille TTY machines.
- 4.5 The Productivity Commission's recently released report on long-term disability care and support has proposed that a **National Disability Insurance Scheme** should be implemented in Australia. The proposed scheme includes a recommendation that communications aids be provided as part of the scheme which would be an insurance based scheme, similar to Medicare.¹³ The Associations support this proposal.

5. Answers to questions raised in the Review

Q1 - Consider how the NRS meets the telephone communication needs of people who are deaf or have a hearing or speech impairment?

- 5.1 The Associations recognise that the National Relay Service (NRS) provides a valuable service in allowing deaf/Deaf or hearing/speech impaired Australians to enjoy the same end-to-end connectivity as other Australians and communicate by telephone with others via the assistance of the NRS and its relay officers.
- 5.2 The Associations note that although technologies such as email, instant messaging and SMS may enable communications between people with disabilities and their friends and family they are not always perceived to be appropriate for communication with others such as doctors, schools and government agencies. However, it should be recognised that there is considerable scope for businesses, institutions and government agencies to increase their accessibility by expanding the means by which people can contact them. Organisations are increasingly opening up channels of communication via social media, for example, Telstra recently announced that customers can contact it directly via Facebook¹⁴, and both Optus and VHA already provide customer support via social media and online chat forums.

¹³ Disability Care and Support, Productivity Commission Inquiry Report, No. 54, 31 July 2011. Executive Summary

¹⁴ "Telstra reveals social networking strategy" The Australian, 17 August 2011

- 5.3 The Associations urge the government to consider plans put forward by Ofcom to bring the UK equivalent to the NRS into the “next generation” of services. Ofcom’s research conducted as part of its review of the UK’s text relay service found:

“... that the ability to have natural conversations that are private and where people can interrupt each other is significant. Having flexibility in the choice of communication methods and of devices used and having services that are available when needed are also seen as important factors.”¹⁵

- 5.4 Ofcom’s review concluded that its text relay service should be improved and updated to become a “Next Generation Text Relay” service by extending requirements to support simultaneous two-way speech with live captioning. Further, it concluded that the service should be accessible using mainstream, readily available retail consumer electronics such as standard PCs and be based on standard, open-source IP/ Internet access mechanisms, and not proprietary CapTel-type devices.
- 5.5 While appreciating the benefits of a video relay service, particularly to people who rely on the British equivalent of Auslan for their primary means of communication, Ofcom’s analysis concluded that the costs of a video relay service outweighed the benefits. Ofcom has therefore recommended that video relay be introduced as a limited service that is not available 24/7.
- 5.6 Ofcom also noted that people who use relay services still may have considerable obstacles in contacting many businesses and government agencies. Ofcom recommended that businesses and organisations could better utilise mainstream services such as email, mobile text messaging, instant messaging or deployment of subsidised relay services to allow for improved communications with this sector of the community.¹⁶

How might call centre services be improved? How might outreach services be improved?

- 5.7 The Associations note that there is a high per minute cost of provision of NRS services at almost \$5.50 per call minute relayed as compared to the equivalent services in the UK and the USA.¹⁷ The Associations suggest that increased

¹⁵ Ofcom, Review of Relay Services, 28 July 2011 [Summary](#)

¹⁶ Ibid.

¹⁷ National Relay Service, Performance Report 2009-10 (ACMA) p3 – total cost of NRS \$17.3 million (divided by 3,160,003 call minutes equals \$5.47 per minute)

consultation with industry could result in efficiencies or improvements that assist in bringing down the costs associated with the NRS.

What aspects of the NRS are the most important to users?

- 5.8 We refer to the findings of Ofcom's research into the UK's relay service mentioned at 5.3 above that show that users would like real-time, natural conversations and more flexibility in relation to communication methods and devices.
- 5.9 Access to emergency services via the NRS 106 service is a very important aspect of the NRS. Extending current capabilities to include access to 106 via SMS, smartphone applications or possibly even video calling could improve accessibility. Please note our comments at 2.17 above in relation to the feasibility of SMS to 106. Also, industry considers that any increased accessibility to 106 via SMS or smartphone applications must be controlled by a strict registration policy so that nuisance messages and mischievous pranks which could result in significant costs to ESOs who may respond to a hoax message can be minimised.

What barriers exist to access and use of the NRS?

- 5.10 TTY technology is slow, lopsided and outdated compared to mainstream communication methods now available. It is a proprietary-based, non-mainstream technology with associated higher costs to the end-user.
- 5.11 The Associations note that IP relay is increasingly being used by NRS users and that it is more effective, however, mainstream text-based communication methods such as email, SMS, instant messaging and online chat may provide greater user-satisfaction for some people with disabilities as they are real-time and do not rely on a third-party. The Associations note the research undertaken by Ofcom in relation to its relay service and its conclusion that users of its service would prefer private, natural, real-time conversations and flexibility of communications methods.¹⁸

¹⁸ Ofcom, Review of Relay Services, 28 July 2011 [Summary](#)

Are there other, perhaps better, ways than the NRS to assist people to make and receive telephone calls, in particular for people:

- ***Who can hear and speak but who have difficulty making themselves understood on the phone***
- ***Who can speak but cannot hear, usually people who have acquired hearing loss***
- ***Who can hear and do not use their voice***
- ***Who cannot hear and do not use their voice***

5.12 Ofcom's findings clearly show that users of its relay service would prefer more flexible methods of communication and use of devices. While the NRS is clearly valuable in allowing people with disabilities to contact others in the community, there are other ways now available such as video calling that can be used quite satisfactorily by people with disabilities. In fact, the NRS' own Performance Report shows that it has been experiencing a trend of declining use marked by the increased adoption of alternative communication methods such as email, instant messaging and SMS. Emerging technologies such as video calling will also undoubtedly lead to further decline in need for the NRS.¹⁹ If organisations and businesses are also encouraged to increase their accessibility and provide alternative ways (for example, social media and online chat) for people with disabilities to contact them this will also allow for greater flexibility and other means for people with disabilities to communicate with others without having to rely on the NRS.

Q2 - Build an understanding of what additional support would help people with disability, older Australians and people experiencing illness to communicate through use of telecommunication services.

Other than the NRS, how else are people overcoming difficulties in using technology to communicate?

5.13 Mobile phones and access to the internet provide assistance for some people with disabilities to communicate more readily, particularly younger people with disabilities. In promoting the NRS, Deborah Fullwood of Westwood Spice said,

“Young deaf people use text, email and social media to an incredible degree. But there's still an important role for actual phone calls – when people want to inquire about a job, order something by phone, or make an appointment with a doctor”, she said. “We wanted to let deaf young

¹⁹ National Relay Service, Performance Report 2009-2010 (ACMA) p4

*people know there is a service that lets them use the telephone to call hearing people — and they can do it all online, with internet relay”.*²⁰

5.14 As per our answer at 5.12 and in section 2 of the submission there are many ways that people with disabilities can communicate today using fixed phones that have greater accessibility features, the internet and mobile phones. Smartphones, in particular, that have inbuilt accessibility features that allow for increased access to these mainstream technologies. It is the devices themselves that are now available that are allowing people with disabilities to overcome difficulties in communication.

- ***Provide examples of technologies, equipment and services used if any, and describe the situations where these technologies and equipment are used and the barriers they overcome***

5.15 The internet, email, digital answering machines, voicemail, SMS, instant messaging services, VoIP (some include video), IP chat, voice activated services, text to voice conversion, technical support services via online social media forums, smartphones and smartphone applications. These technologies allow people with disabilities to make video calls, use text messaging, use touch screens and in-screen keyboard (preferable to small buttons), customise their devices according to their own personal requirements, use volume controls and visual/vibrate alerts and zoom text to make it readable, to name but a few features that increase accessibility of today's devices.

What gaps in assistance exist? How important is it to address these gaps? Why?

5.16 For people with multiple or complex accessibility needs there will always be a requirement to have equipment that is specialised or adapted for them. The Newell Network is a valuable resource for this sector of the community. And if people with these requirements are able to draw on funds from a wider disability insurance scheme, such as the one proposed by the Productivity Commission, it would allow for them to have access to a wider range of specialised equipment. This would also allow the equipment to be integrated with all their needs better than if they were to rely solely on equipment provided as part of their telecommunications service provider's disability equipment scheme.

²⁰ YouTube Love story promotes phone service for the deaf, July 14 2011, [ACMA Engage](#)

How do/could people needing help:

- ***Find out about new services and equipment that could meet their telecommunication needs***
- 5.17 As many new services and equipment that could meet the telecommunication needs of people with disabilities are also mainstream services and equipment, it is likely that they can find out about these services through standard retail channels. The GARI database can provide specific information about the accessibility of various mobile handsets.
- 5.18 The NRS is clearly also an important resource for deaf/Deaf and hearing impaired Australians who are looking for assistance with telecommunication needs.
- 5.19 Disability and consumer forums such as ACCAN are also points of information for people with disabilities.
- 5.20 For people with more complex needs or multiple needs the Newell Network is an important resource.
- 5.21 If the government were to adopt the Productivity Commission's recommendation to implement a National Disability Insurance Scheme and provide communications aids and equipment through that scheme, then the scheme would most likely become the first point of contact for anyone enquiring about new services and equipment to meet their telecommunication needs.
- ***Let the government and industry know about their telecommunication needs***
 - ***Access consumer support, such as getting help with faulty products or contracts that may be unreasonable?***
- 5.22 For consumer support, people with disabilities should be able to first speak to the provider of their telecommunication service or the supplier of any equipment or product. For issues relating to telecommunication services the TIO is available as recourse for consumers who have not been able to resolve an issue with their service provider.

How could industry:

- ***be encouraged to think routinely about access issues in the design and delivery of its products and services***

5.23 The telecommunications industry does routinely think about access issues in the design and delivery of its products and services. From design to the launch of a product or service, equipment manufacturers and telecommunication service providers both incorporate accessibility into the design of products and services as part of their overall product design, development, delivery and review processes. This is in line with the government's "universal design" approach outlined in its National Disability Strategy. As the Internet continues to push intelligence from the network into edge devices, the role of customer equipment suppliers will be increasingly important.

5.24 Optus, for example, currently liaises with members of its Consumer Liaison Forum to discuss policy issues that arise in relation to its services for people with disabilities. It consults with its Disability Sub-Working Group on new products for its Disability Equipment Program and the effectiveness of existing processes that support customer service for people with disabilities. Telstra also engages with consumer organisations to enhance the accessibility of its products, services and information and to support its disability initiatives. Telstra hosts a twice-yearly Disability Forum on telecommunications issues and action planning initiatives with representatives from national peak disability and older Australian consumer organisations.²¹ Telstra also twice-yearly hosts a Consumer Advisory Group which advises it about the operation and equipment provided under the Telstra Disability Equipment Program.

- ***Keep people informed of new and emerging technology that could help address barriers to telecommunications access?***

5.25 It is important to clarify what is meant by 'industry' when placing an obligation on educational campaigns for new and emerging technologies. As mentioned above specialist providers from Australia and overseas are best placed to offer specified equipment suited to meet an individual customer's needs and there are a number of existing organisations that already do this. For example, GARI is a central point of information that people with a wide range of disabilities can refer to. Individual network providers would only be duplicating these services.

²¹ <http://www.telstra.com.au/abouttelstra/commitments/disability-services/community-initiatives/index.htm>

5.26 Most devices mentioned in this submission are not restricted to a particular carrier's network. As new equipment becomes available, more opportunities become available for increasing customer portability. It is therefore more likely that knowledge about new equipment for new technologies is best placed to come from specialist providers or centralised support bodies rather than individual network providers themselves. Customers usually choose to activate their own customer equipment (for data, mobile and fixed) on networks and network providers are therefore not usually able to provide an exhaustive list to their customer base of what equipment is compatible on their network. The same approach should apply to equipment for people with disabilities.

What information would assist industry in considering commercial opportunities for new equipment and technologies that provide greater access?

5.27 Information on potential market share is an important component in considering a worthwhile commercial return for any product and would assist industry players in making informed decisions to release and promote new devices.

Q3 - There are many times when the government would like to get in touch with people who have problems communicating and who cannot use telephones. One possible solution is for the government to keep a register – names, contact details and information about each person's communication needs – of people who want the government to keep in touch with them for these reasons.

- ***Should the government maintain a voluntary register of people wanting contact for these sorts of reasons? What important things should the government consider in the design of such a contact list? What privacy concerns are most important?***

5.28 The Associations have no objection to the government keeping such a voluntary register. It would be most useful if summary information about the number of customers with particular types of disability could be made publicly available from the proposed register to assist equipment and service planning.

- 5.29 Telecommunication service providers prefer not to keep such a register, particularly as many people with disabilities are able to make use of mainstream products and services and do not need to be specially identified by their telecommunication providers. The existing disability equipment schemes operated by the carriers do not require the keeping of such a register (that is, one that identifies the customers' particular disabilities or needs).
- 5.30 Indeed, feedback received from people with disabilities has indicated that they prefer to be treated by their telecommunications service provider in the same manner as those without disabilities. Therefore few records are kept of the nature of a customer's disability unless specifically required to provide the customer with the service of their choice (for example, whether they have requested Braille or large font billing, a TTY or access to the Directory Assistance Helpline).
- 5.31 For the provision of specialised services, for example, SMS access to emergency services, there would clearly be a need for the NRS to maintain a register of people requiring such a service to minimise abuse of the service and so ensure appropriate quality of service levels can be met.

6 Conclusion

- 6.1 The Associations recognise that the NRS provides a valuable service to Australians with disabilities. The Associations conclude that a review of the NRS must include the following:
- ❖ Ongoing industry consultation on the effectiveness and efficiency of NRS operations and on any considerations to change the scope of operation of the NRS.
 - ❖ Consideration and analysis of the Ofcom review of the UK's relay service and its initial findings.
 - ❖ A rigorous cost-benefit analysis of the introduction of any new services or programs.
 - ❖ Consideration of the impact of emerging technologies such as video calling and alternative means of communications that are being increasingly adopted by individuals with disabilities as well as organisations and businesses.
- 6.2 Any framework for a disability equipment scheme should be integrated with the government's existing social inclusion programs such as Job Access (Employment Assistance Fund), existing pension and support funds, the National Disability Strategy and the proposed National Disability Insurance Scheme.
- 6.3 The Associations welcome the opportunity to provide comment to this review and our members would be happy to discuss any of the above points with the Department of Broadband, Communications and the Digital Economy in more detail.
- 6.4 For further information or to arrange further consultation please contact either:
- Lisa Brown, Policy Manager, AMTA at 02 6239 6555 or lisa.brown@amta.org.au
or
Mike Johns, Project Manager, Communications Alliance at 02 9959 9125 or m.johns@commsalliance.com.au