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Independent Disability Equipment Feasibility Study

Discussion Paper

Submission to Department of Broadband, Communications and the Digital Economy by:

**Australian Mobile Telecommunications
Association**

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1. Introduction

- 1.1 The Australian Mobile Telecommunications Association (**AMTA**) is the peak industry body representing Australia's mobile telecommunications industry. AMTA's mission is to promote an environmentally, socially and economically responsible, successful and sustainable mobile telecommunications industry in Australia. AMTA members include mobile network operators (**MNOs**), handset manufacturers, retail outlets, network equipment suppliers and other suppliers to the industry. For more details about AMTA, see <http://www.amta.org.au>.
- 1.2 AMTA welcomes the opportunity to provide input to the DBCDE Feasibility Study into an Independent Telecommunications Disability Equipment Program.

Australian Mobile Telecommunications Association

- 1.3 AMTA's program includes a specific focus on accessibility issues. On behalf of its members, AMTA seeks to identify, develop and promote the accessibility of mobile telecommunications products and services for all Australians.
- 1.4 AMTA's Accessibility Committee 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 disability is part of AMTA's consideration of all issues
- 1.5 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.
- 1.6 This information can be found under the Disability Access section on the AMTA website at www.amta.org.au. This includes tips and help on how to make and manage calls, and how to make physical, visual, auditory and other tasks easier.

Accessibility Partnerships

- 1.7 AMTA has collaborated with the Federal Government's National Acoustic Laboratories (NAL) to produce a brochure on mobile phones and hearing aids. The guide gives practical advice to people with hearing aids using mobile phone 3G technology about purchasing both hearing aids and phones to get the maximum benefit and to avoid unwanted interference from their phone. The brochure represents 10 years of research and addresses 3G technology for the first time. An electronic copy of the brochure is accessible from the AMTA website at www.amta.org.au
- 1.8 AMTA supported an officer with the Human Rights and Equal Opportunity Commission (HREOC) to attend a meeting of a United States Federal Communications Commission (FCCC) advisory committee established to assist in revising and updating accessibility guidelines for telecommunications products and accessibility standards for electronic and information technology in the US.
- 1.9 TEDICORE, an independent forum which represents the interests of people with disabilities in relation to telecommunications, provides advice to the Accessibility Committee.
- 1.10 As noted by the activities described above AMTA's Accessibility Committee has focussed much of its attention on the provision of information both within the industry and to target groups in the accessibility sector. Product and service awareness remain a major challenge and one that requires a partnership between industry, government, and relevant consumer and accessibility representative organisations.

Social Policy

- 1.11 The Governments of Australia accept a range of responsibilities for social policies to address inclusion and needs of those who are socially disadvantaged by disability, age, income and a range of other circumstances where an inequality exists.
- 1.12 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.
- 1.13 AMTA suggests that access to telecommunications equipment and services should be part of a holistic policy approach to overcoming disadvantage as experienced by certain groups in society. To this end the need for government support and funding for an Independent Disability Equipment Program specific to

telecommunications must first be considered in relation to existing social inclusion policies and programs.

- 1.14 Should a specific telecommunications need be identified this should be considered for integration with existing equipment programs that already service the same target groups before a specific program is established.

Australian Mobile Telecommunications Market – Key Recent Statistics

- 1.15 The Australian Communications and Media Authority's (ACMA) Communications Report 2007-08^[1] highlights the growing impact and importance of mobile telecommunications across the entire economy and the key role played by the technology in balancing family, work and social needs.

- 1.16 The ACMA's key findings for mobile telecommunications in 2008/09 were:

- *The number of 3G subscriptions grew by 88% in 2007-08 from 4.6 million to 8.6 million.*
- *There were 22.12 million mobile phone services in Australia at June 30 2008, up from 21.26 million.*
- *The welfare gained by customers (consumer surplus) from using mobile telecommunications services was \$3,287.80 million compared to \$317.50 million for internet services. The ACMA report says the majority of the increase in the consumer surplus is attributable to changes in the mobile telecommunications sector as prices fell and subscriber demand grew.*
- *In estimating the consumer surplus for mobiles, ACMA calculated that mobile phone calls fell in price by 21.5% and the price of SMS/MMS decreased by 41.5%.*

Mobile Telecommunication Trends

- 1.17 The impact of the latest generation mobile services is pervasive, contributing significantly both directly and indirectly to Australia's economy while also providing numerous social benefits.

- 1.18 For example, mobile applications are currently helping to connect remote communities, enabling remote medical diagnosis, delivering educational benefits, facilitating logistics and personnel planning and assisting with criminal investigations. Individuals and organisations also enjoy the social and productivity benefits associated with mobile connectivity via voice telephony, data services and internet access.

^[1] http://www.acma.gov.au/WEB/STANDARD/pc=PC_311541

- 1.19 The rapid rise of mobile data services is being strongly supported by consumers and the industry has responded through strong competition driving enhanced consumer value and choice via an increasingly diverse range of latest generation products and services.
- 1.20 Mobile broadband is a stand out and has huge potential to further extend the key role of mobile telecommunications in all facets of life through the union of two of the most influential technological developments of the digital age – the mobile phone and the internet.
- 1.21 Convergence trends are changing the functionality of the modern mobile device which is now capable of multiple functions spanning telephony, email, SMS and MMS, photography / video, web browsing, music storage, games and many of the features and programs currently found in laptop computers.
- 1.22 The device features offered, including those relevant from an accessibility perspective such as voice output for SMS and numbers dialled, large buttons, large screens and fonts, voice dialling of regular phone numbers, and certification for hearing aid compatibility, are increasingly available across a broader range of devices including those at lower price points.
- 1.23 The combination of devices and service plans cover all price points from \$10 (not including a device) and \$20 (including a device) to hundreds of dollars for the latest smart phone and plan. Intense competition within the industry has seen prices fall over time as noted by the ACMA in their latest industry report (07/08).
- 1.24 While there has been a decline in cost of mobile telecommunications and an expansion of equipment and services, that include relevant accessibility features, there may be individuals who are socially disadvantaged by disability, age, income and a range of other circumstances and therefore need financial support to gain access to mobile telecommunications. This support should be provided by Government as part of the overall social policy agenda.

2 Conclusion

- 2.1 Given the current low cost and widespread availability of mobile telecommunications equipment and services, AMTA's view is that the inclusion of general mobile telecommunications equipment in an independent disability equipment program is not necessary.
- 2.2 In situations where specialised solutions are needed to overcome severe or extreme circumstances an allocation of government funding to assist with affordability and therefore access to equipment as part of a disability equipment program is more relevant and appropriate.
- 2.3 A disability program for telecommunications equipment should be integrated with existing disability equipment programs prior to establishment of a specific telecommunications independent disability equipment program.
- 2.4 AMTA believes that raising the awareness of devices and services already available is the first step to bringing mobile telecommunications to all sectors of society. AMTA sees this as a key issue for accessibility consumer groups in partnership with industry and governments.
- 2.5 AMTA is aware that the range and complexity of issues involving the interaction of communications and social policies in the context of accessibility warrants careful and specific attention. The Association on behalf of its members has, and will continue to proactively engage in this regard and looks forward to further consultation with DBCDE on the issues raised.