



**Australian Mobile
Telecommunications
Association**

Submission to Department of Communications and the Arts

Communications accessibility: 2016 and beyond

6 May 2016

Background

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>.

Communications Alliance is the primary telecommunications industry body in Australia. Its membership is drawn from a wide cross-section of the communications industry, including carriers, carriage and internet service providers, content providers, equipment vendors, IT companies, consultants and business groups. 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>.

Introduction

The members of AMTA and Communications Alliance (the Associations) are committed to providing services that can support Australians living with disability. The Associations have a long-running partnership with the Mobile Manufacturers Forum ([MMF](#)) and its Global Accessibility Reporting Initiative ([GARI](#)) which assists consumers to find an appropriate device to meet their accessibility needs. Optus and Telstra also provide disability equipment programs and have registered Disability Action Plans in place.

The National Relay Service (NRS) is funded by the Telecommunications Industry Levy which is collected annually from eligible carriers.

The Associations believe that today's mainstream communications technologies offer an unprecedented level of accessibility. Both fixed and mobile communications today can provide not just a means of making phone calls for people living with disability but can enable independent lifestyles, increased workforce participation, provide educational tools and improved social connection with the wider community.

We have made some general comments below and responded to the specific questions raised in the "Communications accessibility: 2016 and beyond" consultation paper.

The Associations also note that we consulted with the Australian Communications Consumer Action Network (ACCAN) regarding the drafting of this submission.

Changing world of communications

The world of communications has radically changed since the NRS was established.

TTY was a vital and viable text communications method for those who could not use voice, when no other text communication services were widely available to the public. Importantly, communication to the broader community of voice users and text communication to emergency services was made available via the National Relay Service.

Today, communications networks, including mobile networks, are predominantly data-based. Data services and text communications are now widely available across fixed and mobile networks and are now the mainstream means of communication for the whole community. Billions of people across the globe now communicate using social media every day.

Convergence between fixed and mobile communications networks is a firmly established reality and internet access, text and video communications are available across both fixed and mobile networks.

Mobile communications are an enabling technology. For example, a recent report by Deloitte Access Economics found that mobile technology significantly increases the level of workforce participation in Australia's economy for several sectors of the population, including those living with disability, seniors, and parents/carers. That is, the report found that those surveyed would work on average 0.6 hours less per week if they did not have access to mobile devices. This not only has an impact on those individuals who are able to increase their workforce participation but has an impact on the economy to the effect that the economy is \$8.9 billion larger as a result of mobile-enabled labour force participation.¹

Next Generation Emergency Communications (as adopted in North America, Europe and parts of South-East Asia) envisage multimedia communications to emergency services across fixed and mobile networks. These next generation services allow for access to emergency services via text, internet and social media which enables both wider access and more options for various circumstances. This contrasts with Australia's separate NRS solution for TTY access to emergency services and the absence of a recognised emergency service access solution for people who are deaf, hearing and/or speech impaired using mobiles. The Associations and ACCAN believe that there are opportunities for increasing accessibility to Triple Zero (000) emergency services, for example by text or social media, and that this should be considered as a priority along with the implementation of next generation emergency communications in Australia.

The Associations note that the manufacturers of TTY equipment have notified industry members that they will soon cease manufacture and supply of TTY equipment.

It is, however, extremely important to recognise that long-term users of TTY are understandably reliant on the service and it will be difficult for many of them to transition to modern technologies without adequate support. In some cases, such a transition will simply not be practicable and industry remains committed to supporting TTY for those that are unable to transition to other services.

¹ Deloitte Access Economics – [Mobile Nation: Driving workforce participation and productivity](#) p ii, 2016

On the other hand, it would equally detrimental and socially isolating to continue to promote TTY to people who are digitally literate or capable when modern technologies and mobile communications have so much more to offer in terms of communication options. A person can now utilise mainstream devices (PC, laptops, tablets, smartphones) to access mainstream data-based, text and video communications options (email, SMS, instant messaging such as iMessage or Whatsapp, social media, as well as VOIP options such as Facetime and Skype). These options all have the added benefit of enabling direct communications (for most users) without the need for a relay service. The Associations note that ACCAN's feedback from NRS users is that direct communication methods are always preferable, but that the NRS fills an important gap when direct communications are not available or accessible.

A way forward

The Associations submit that, where practical, Government should support and promote a shift away from reliance on TTY specifically, and the NRS more generally, to increasing use of mainstream direct communications as this would be more effective, efficient and beneficial for end-users that are able to use mainstream technologies.

Such a shift in approach would necessarily require whole of Government support in terms of providing more accessible communications for their customers. For example, all Government agencies should provide text-based contact points e.g. customers should be able to contact Government agencies via SMS, email or social media. These methods have already been adopted by some Government agencies, such as Centrelink and many large businesses, including many telecommunications service providers. Even small businesses routinely provide text-based contact points for customers and this is an inexpensive initiative that should be strongly promoted by Government and industry alike. The Associations note, however, that ACCAN's feedback from consumers is that Centrelink's alternative access methods are still not able to adequately meet demand levels and that there is much room for improvement in both provision of various contact methods as well as responsiveness.

The Associations also suggest that it would be useful to understand if the costs involved in the NRS video relay service could be minimised if larger Government agencies e.g. Centrelink and Medicare provided video access via Skype or similar platforms and employed Auslan interpreters. A cost-benefit analysis of such an approach would be useful in informing a whole of Government policy shift.

Equally, the Associations support the principle that a safety net communication option should be provided for those in the community who are not able to access mainstream communications and must rely on the NRS to communicate with others in the community. The NRS will continue to have an important function in supplying this safety net option and it would be reasonable to continue using levies from the telecommunications industry to fund the NRS to provide needed services.

It is clear from the consultation paper that the number of individual users who must rely on the NRS safety net has reduced and will continue to decline due to both new technologies available and natural attrition. What remains unanswered, however, is how best to identify those individuals who will continue to need the safety net of the NRS and which services would need to be offered to meet their needs. In order for policy to be shaped correctly, this is a fundamental gap that must be

addressed. The Associations note that the NRS is only able to estimate its number of users and it would be very useful to have more information about how many NRS users there actually are and which services they are using and why.

The industry strongly supports adoption of the North American/European standards for Next Generation Emergency Services and notes that this matter has been sitting with the Federal Government awaiting a decision for an extended period. This approach can reduce reliance on the NRS for emergency calls, as mainstream options for contacting emergency service can be used.

Option 1 – Funding arrangements for the NRS

The Associations firmly believe that the NRS is providing services that will be used less and less as the need for those services inevitably declines. It therefore would be more sensible to investigate how those services could be provided more efficiently at existing funding levels.

While new or emerging services could be provided by the NRS, funding from industry should be applied only by measuring it against the principles of supplying the safety net mentioned above. The Associations believe that any additional services the NRS chooses to supply should be funded from other sources.

Option 2 – Managing Demand for the NRS

The Associations support the intent to manage demand for the NRS, however, such management should maintain the principle that customers are best placed to determine when they genuinely need to use the service and how often.

There are many legitimate reasons for NRS users to have the ability to contact 24/7 based services (e.g. fault reporting, emergencies, shift-workers) in an equitable manner to others in the community.

The Associations suggest that while only those who are actually eligible or have a legitimate need for the services should be using the NRS; more information is required from either the NRS or DoCA about current users to determine how demand can be best managed. For example, which are the most common contact points for NRS users? Which services can't be replaced by mainstream communications? Which groups of NRS users – and is this correlated with types of disabilities or some other profile factor e.g. age – are unlikely to be able to access mainstream communications?

While the broader base of NRS users will inevitably decline over time, particularly if mainstream communications options can be supported and promoted by Government and business, the Associations recognise that there will remain some customers for whom the NRS will in all or some cases remain the only option. It would be helpful to understand better how these customers can be identified so that the NRS can be suitably tailored to meet their needs. A more targeted approach to the delivery of the NRS will potentially result in significant cost savings.

Option 3 – Fair use policy

The Associations agree that a fair use policy for the NRS is worthy of consideration, but more information is needed about the types of usage that are putting pressure on current NRS capacity.

For example, it would be helpful to understand where high call volumes or lengthy calls are directed to particular business or Government destinations. If strong patterns can be determined, it could be useful to add a communications levy on those particular destination customers for a fair contribution to the costs of the NRS. Adding such a price signal would also encourage those destination customers to offer alternative text-based contact points, such as Webchat solutions via their webpages, however, it would be important to ensure there is no disincentive for these agencies or businesses to accept NRS calls as some users will necessarily rely on having that option.

Also, it would be helpful to understand if excluding some types of calls e.g. SMS to SMS relay (which would seem to have limited added value compared to direct SMS communications) would result in significant cost-savings.

Similarly, a registration process for NRS users could be considered if the intent is to capture sufficient data to identify the NRS customer base and who they are calling as this would be useful information for managing both demand and costs. There should also be a focus on ensuring that any registration process identifies and removes misuse of the NRS service, e.g. people who are not deaf or hearing/speech impaired using NRS for commercial advantage because it is cheaper than a long distance call.

Finally, emergency service options provided by the NRS must be exempted from any fair use policy.

Option 4 – NRS Outreach program

The Associations see value in an outreach program but it should focus primarily on raising awareness and promoting use of mainstream communication options that can be utilised by the appropriate customers

It would be helpful if DoCA could provide more data on the profile of NRS users and what communications services they use to get a better understanding of how their communication needs can be best met by mainstream communications.

It would also be useful to understand more about the declining proportion of customers who cannot or are uncomfortable using mainstream communications so that a longer-term strategy can be put in place for them. Specifically, it would be helpful to identify the total number of TTY customers and which of these customers have access to the internet and could be supported to transition to internet based communications rather than TTY as well as those customers who will not be comfortable making such a transition.

Option 5 – Future delivery of the NRS

The Associations believe that TTY will need to be supported for existing TTY customers; however, it should not be promoted as an option for new NRS customers – as it would simply not be in best interest of a new customer. The outreach program should therefore focus on providing assistance

and support to NRS customers regarding how to use other methods of communication as their first option.

Option 6 – Disability Equipment Programs

The Associations submit that the Regulations in place for disability equipment programs should be reviewed in the context of changes to telecommunications sector (including the NBN) as well as taking into account the array of mainstream communication options now available for people living with disability.

Mainstream communication devices are readily available in the mass market and customers are no longer reliant on telecommunication providers for devices and accessories.

However, the Associations note that some people living with disability will have complex communications needs that can only be met by specialised or modified devices and equipment. Such specialised equipment and services are already supplied by private sector specialist retailers under the framework of the NDIS who are far more flexible in responding to market demand than telecommunications carriers. ACCAN also provides information and assistance at <http://accan.org.au/disability>.

Option 7 – More data-rich, affordable plans by retail service providers

Mobile communications are constantly and rapidly evolving. One clearly identified trend is the move away from reliance on voice and SMS to use of mobile internet, apps and instant messaging marked by dramatically increasing demand for mobile data services.

“The past decade has seen mobile data become faster, cheaper and more accessible, with the average mobile subscriber cost per megabyte decreasing by 99% between 2005 and 2013 (Boston Consulting Group, 2015) and fourth generation networks offering data transmission speeds more than 12, 000 times faster than second generation networks.”²

Mobile service plans now on offer reflect this trend with unlimited voice and SMS often included with increasing data allowances.

There are also plans available that offer data only mobile broadband services, tailored to data-only users. Mobile broadband services allow customers to use data only and still be mobile.

Most mobile phones and devices, such as tablets, now also have Wi-Fi options and Wi-Fi is increasingly available.

The Associations believe that there are a wide variety of both mobile phone and mobile broadband plans currently available in the market that offer good options for customers primarily interested in

² *Mobile Nation: Driving workforce participation and productivity* Deloitte Access Economics, 2016, p10

using data. Post-paid and pre-paid options for both mobile and data-only mobile services are readily available.

Many service providers also offer data sharing options as part of their mobile plans which allows data to be shared across both mobile and data only mobile devices, offering even greater flexibility when managing affordability of communications across a household.

The Australian Competition and Consumer Commission's ([ACCC annual telecommunications reports](#)) for 2014-15 found that data allowances are increasing while prices are continuing to fall. The report found that data allowances increased by over 70 per cent for DSL internet services and more than doubled for post-paid mobile services in 2014-15 while overall prices fell by 0.5 per cent in real terms.

“Consumers are reaping the benefits of competition in the form of increased data allowances, new services, and lower prices,” ACCC Chairman Rod Sims said.³

This reflects an ongoing trend. The ACCC reports for 2013-14 showed that prices paid by consumers for telecommunications services fell by 2.7 per cent in real terms. The reports also found that the average real prices of landline and mobile voice calls have fallen by around 50 per cent since 1997-98.

“Competition is driving substantive reductions in the price of telecommunications services, significant infrastructure investment to improve the quality and coverage of services, and technological innovation,” ACCC Chairman Rod Sims said.⁴

Option 8 – Initiatives to improve digital literacy and mainstream communication options

The Associations have suggested that a whole of Government policy approach that requires all Government agencies to be readily accessible via SMS, text, video and social media communications options should be adopted.

Many businesses (including the major telecommunications service providers) already provide such services, but large businesses that do not could be encouraged to offer these options by a implementing a service levy on destination users of the NRS. Such a levy should be based on traffic volumes.

The Associations also suggest that successful programs such as Telstra's Tech Savvy Seniors and support offered by [Jeenee Mobile](#) to its customer base provide very useful models for similar education and awareness campaigns that could be implemented by the outreach program. Similarly, the [ASIC Moneysmart educational resources](#) for students about mobile services are also a

³ ACCC – [ACCC Reports growing data consumption and stable prices in the telecommunications sector](#) April 2016

⁴ [ACCC – Consumers continue to benefit from falling prices for telecommunications services](#) March 2015

useful model in terms of educating customers about how to choose a mobile plan and how to manage their spend and usage.

Research on why customers choose NRS services rather than mainstream communications options would inform greatly any outreach programs. The Associations suggest that the Bureau of Communications could undertake such research to explore this question in more detail and provide a strong evidence base for the outreach program.

Conclusion

The Associations submit that, where practical, Government should support and promote a shift away from reliance on TTY specifically, and the NRS more generally, to increasing use of mainstream direct communications as this would be more effective, efficient and beneficial for end-users that are able to use mainstream technologies.

Such a policy shift would require a whole of Government policy approach to support access to mainstream communications and support for these communications by Government departments and agencies, as well as businesses.

Finally, the Associations believe that the NRS should continue to provide a safety net communications method for people who are not able to access mainstream communications and necessarily rely on the NRS. The NRS must be managed efficiently so that it can provide effective support for those that need it.

For any questions about this submission please contact Lisa Brown, Policy Manager, AMTA at lisa.brown@amta.org.au or 02 6239 6555 or Mike Johns, Communications Alliance at m.johns@commsalliance.com.au