



Independent Living Centre
NSW



Access for people with disability to emergency calls from mobile devices: The consumer position

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Access for people with disability to emergency calls from mobile devices – the consumer position

Australian consumers with disability need a safe, reliable and accessible way to make emergency calls when they are out and about.

Australia is a signatory to the United Nations' human rights instrument, the [Convention on the Rights of Persons with Disabilities](#) (UNCRPD). Under [Article 9](#), signatories shall "take appropriate measures to ensure to persons with disabilities access, on an equal basis with others...to information and communications... (including) ...emergency services." Under [Article 11](#) of the UNCRPD, signatories shall "take...all necessary measures to ensure the protection and safety of persons with disabilities in situations of risk". Access to emergency calls is a human rights issue.

The organisations listed above represent consumers of telecommunications and the communities to be served by the proposed services - people who are Deaf, hearing-impaired or with speech impairment or complex communication needs (CCN). We stand together in calling for a simultaneous implementation of both an SMS emergency service and an emergency service provided via a smartphone application.

Background

Most Australians take for granted their access to emergency calls via 000 - calls which are increasingly made from mobile phones.ⁱ

However, for people who are Deaf, hearing-impaired or speech-impaired, access to emergency calls from mobile phones is difficult or impossible.

In April 2010, after many years' of lobbying by consumer organisations, Senator Conroy, Minister for Broadband, Communications and the Digital Economy, announced his intention to "[establish an SMS emergency service for people with disabilities](#)" and asked the Department of Broadband, Communications and the Digital Economy (DBCDE) to "address these implementation issues as a matter of priority". The Government has therefore made a commitment to emergency access via SMS.

Separately from the SMS emergency service, the [Australian Communication Exchange](#) (ACE) commenced development of a [smartphone app](#) via which NRS users could make emergency calls. The DBCDE is working with the NRS and other bodies to commence a trial of this emergency app service.

Currently there are two ways for people who are Deaf, hearing-impaired or speech-impaired to contact emergency services from a mobile. Both methods require the facilitation of an intermediary, a relay officer from the [National Relay Service](#) (NRS).

- [Speak and Listen](#) (for people with speech impairment only; they must have speech, or a speech output device, which can be understood by a relay officer)
- [Internet relay](#) from a limited number of smartphone devices. (Note: this number is likely to increase soon.)

Both the proposed emergency app and SMS solutions would require the facilitation of an NRS relay officer.

Which solution?

Both the SMS and the emergency app are welcome improvements on the current situation. While neither proposed solution provides the same level of reliability and safety as direct calls to 000 (or even to [106](#), the NRS landline equivalent of 000), both solutions are clearly better than the current extremely limited access from mobile phones.

This does not mean, however, that both proposed solutions are equally beneficial to all members of the community. There are advantages and disadvantages of both options for Australians with disability.

Advantages

SMS is available on all mobile phones, and many people with disability, particularly those who are Deaf or hearing-impaired, are extremely familiar with its use, including dealing with its store-and-forward functioning. SMS is also frequently more easily accessible for people with dexterity issues and/or CCN, as it can be accessed using large, push-button keys, via Bluetooth from accessibility devices and even directly using some computerised speech output devices.

The app solution provides real-time communication with Emergency Service Organisations (ESOs); in most circumstances, will provide at least some automatic location information; is easier to use for some people with disability; and allows the possibility of further developments, such as Auslan users being able to converse via a video relay service. App users would have the ability to test the service, and would receive active feedback if they do not have coverage or if their message has not been delivered.

Disadvantages

The SMS solution would not provide real-time communication, and callers may take significantly longer to receive assistance, given the store-and-forward nature of SMS as well as the necessity to specifically provide location information and request the specific ESO type required. SMS may be more difficult to use for some people, such as some people who are older, or who have some dexterity, deafblindness and/or cognitive disabilities. Education would be required to train consumers in which information should be provided, and in which order, and how to know when a message may not have been received.

The app solution would require that consumers purchase specific types of smartphone handset, resulting in lack of consumer choice, and extra costs (both initial and ongoing) for consumers who already have a mobile phone, or who would otherwise purchase a non-smart mobile phone. Not all phones (even with the two operating systems, Android and Apple, which have been mooted as the two initial trial operating systems) have GPS, in which case, although some automated location information can be provided through other means, such as Wi-Fi, consumers would still have to specifically provide location information. Many consumers are not familiar with smartphones and would require training in using them. Smartphones are not accessible for some people with disability and older people, particularly people with some dexterity and/or cognitive disabilities.

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Having considered the options, consumers have adopted the following unified position.

- The Government, and the Department of Broadband, Communications and the Digital Economy, is to be congratulated for seeking to implement solutions for people with disability to access emergency calls from mobile phones.
- **Both** proposed solutions are necessary to ensure safety and reliability for the greatest number of people with disability.
- Both proposed solutions should be implemented **simultaneously, as soon as possible**. If a simultaneous trial is unfeasible, then SMS, which has already been prioritised by the Government, must be trialled first.
- Consumers recognise that, at least initially, there may be some low costs to contact or access these services. Consumers also recognise that network prioritisation is not possible for either option. We urge the Government to not allow these issues to hinder the trial of either solution – we are convinced that in a life or death situation, ‘something is better than nothing’. However, we also ask that investigations continue to ensure that emergency SMS messages become free (particularly for handsets which do not have available credit) within 12 months of the commencement of the trial, and that consumers can enjoy enhanced reliability through network conditioning within 12 months.
- In the interests of consumer choice, accessibility and affordability, consumers expect that the app solution will be able to be used by older versions of Android and Apple phones – up to three years prior to the commencing of the trial – and also expanded to include other operating systems, specifically Symbian and Blackberry, within 24 months of the commencement of the trial.
- Consumers recognise that registration will be a necessary component of the trial and eventual ongoing service.

This position has been endorsed by:

- Australian Communications Consumer Action Network
- Australian Deafblind Council
- Communication Rights Australia
- Deaf Australia
- Deafness Forum of Australia
- Independent Living Centre NSW

ⁱ The number of calls received by ESOs from mobile phones in 2008/09 (2.6 million) has doubled since 2003/04 (1.3 million). In the 2008/09 reporting period, calls from mobile phones to the ECS accounted for 63 per cent of all calls, compared to 52 per cent in 2003/04. (ACMA, ‘Mobile Location Information: Location Assisted Response Alternatives’, May 2010’; http://www.acma.gov.au/webwr/assets/main/lib311840/mobile_location_information_location_assisted_response_alternatives.pdf)