



Telecommunications Service Access Issues for Deaf people

This discussion paper will provide an insight into the service access requirements for Deaf¹ people to access mainstream telecommunication services in the same way as other Australians.

This paper will cover carriage services providers, Australian Communication Exchange – National Relay Service (ACE-NRS), telecommunications regulatory and industry peak organisations (eg Australian Communications Authority and the Australian Communications Industry Forum), Commonwealth Department of Communications, Information Technology and the Arts (DoCITA) and the Telecommunications Industry Ombudsman (TIO). The Deaf Telecommunications Access Network (DTAN) believes that the issues raised will also apply to other service industries across the board.

Areas of Service access that DTAN will explore are:

- ◆ Retail Service Centres
- ◆ Telephone contact to Call Centres
- ◆ Information dissemination
- ◆ Equipment provision
- ◆ Service delivery

Each area will be examined and issues of concern addressed. Solutions will also be provided where possible.

Retail Service Centres

Retail Service Centres provide direct customer service to the public, which includes Deaf people. Issues that need to be addressed include:

¹ The issues in this paper apply to Deaf people who use Australian Sign Language but may also concern people who are hard of hearing or have a speech impairment

a) Communication with Customer Service Staff

Deafness is about communication and the ability to give and receive information. For a Deaf person to obtain access to information that person must be able to understand the information and the way it is being conveyed.

A common myth is that a Deaf person can automatically lipread everything because they have more superior eyesight that compensates for the loss of hearing. Another myth is that hearing aids enable Deaf people to hear the same as everyone else. Unfortunately, as is often the case with myths, the reality is quite different.

Many Deaf people avoid dealing directly with customer service staff unless it is absolutely necessary (eg connecting a TTY line in their home). Many people report that obtaining accurate information is a frustrating experience and a time consuming task.

b) Demonstration of equipment

Members of the public visit retail stores to get an idea of the type of equipment available and discuss issues with customer service staff. Telecommunications equipment is largely designed for the generic market without much consideration for the needs of Deaf people.

If a Deaf person visits a store they need to receive a demonstration of the equipment to ensure it is accessible for them prior to purchase. For example, if a Deaf person wants to purchase a mobile phone with SMS text feature, that person may need to try the phone to make sure the feature is active, easy to use and understand how the phone works. The same may apply when a Deaf or hard of hearing person wishes to test the volume control function on a standard telephone.

Telecommunications companies are reluctant to allow customers to trial new equipment in the store, but for Deaf people it is critical that they do this so they can be sure the equipment that they purchase is accessible. Previous experience has shown that Deaf people have purchased equipment after being advised by the customer service staff that it had the features required. However, they would later discover that it did not suit their needs and were stuck on a plan or phone that was not suitable.

c) Provision of an Auslan Interpreter

For Deaf people who use Auslan (Australian Sign Language) the problem is further exacerbated by the fact that many hearing people are unable to communicate in their first or preferred language. This makes it more difficult to obtain the information they may require.

This is the same experience of someone going to another country (eg Spain, France) where people do not speak English and trying to purchase a mobile phone from one of the local shops when you are unable to communicate in the local language. For overseas travellers this is a short term problem but for Deaf people it is a lifelong issue.

To ensure maximum and equal access, Deaf people require the services of an Auslan Interpreter. Over the years, Deaf people have used family members (including children) to interpret or relay information to them. However, in recent years, there has been a move away from relying on family members to encourage Deaf people to be more independent and make informed decisions.

Today, Deaf people access interpreters for a wide range of services; however the ongoing issue is who pays the interpreter for their work. Traditionally, the service agency that wants to communicate with the Deaf person covers the costs to enable equal access for Deaf people. The *Disability Discrimination Act (1992)* makes clear reference to this point.

d) Hearing Loops

Some Deaf people rely on hearing aids to assist them with lipreading or hearing conversation. As mentioned earlier, the misconception with hearing aids is that they will enable the person to hear the same as everyone else. This is not the case, in actual fact, hearing aids may improve the quality of the sound but not the comprehension. Hearing aids also pick up all types of noises and Deaf people are unable to differentiate between sounds.

For example, if a Deaf person is in a noisy environment (ie near a photocopier) and is trying to have a conversation with someone, the background noise will interfere with the person's voice and be picked up by the microphone of the hearing aid. The speaker's voice will be drowned out by the background noise through the hearing aid.

One way to overcome this is to use the 'T' switch facility on the hearing aid. This can be done in conjunction with other assistive listening devices such as a hearing loop, which will cut out the background noise. For the hearing loop to work effectively, the speaker must use a microphone. Only then, will the Deaf person be able to conduct a conversation without the interference of noise.

Many Government organisations such as the NSW State Railways and Telstra retail shops provide hearing loops in their ticketing offices or service centres. This needs to be extended to all telecommunications service and retail centres to ensure equal access.

RETAIL SERVICE CENTRES SOLUTIONS:

Some solutions that could be implemented to reduce/eliminate the above issues and promote an accessible and comfortable environment for Deaf customers include:

- ◆ Employment of Deaf employees who can provide customer service in large customer/sales service offices and communicate with deaf customers
- ◆ Intensive Deafness Awareness Training programs

- ◆ Installation and/or provision of hearing loop for those people who rely on hearing aids
- ◆ Plain English printed material outlining accessible products for Deaf people
- ◆ Provision of equipment demonstration at the retail centre
- ◆ Provision of Auslan Interpreters to discuss critical issues

Telephone contact

In addition to retail service centres many companies provide National call centres to deal with customer enquiries and services. Often these centres can save time and energy for people who need to answers to simple enquiries or services.

a) TTY Access

Deaf people with a severe to profound hearing loss cannot use the voice telephone network and rely heavily on text based services. The TTY is the main communication device for Deaf people to make telephone calls to family, friends and conduct day-to-day business. In communication with TTY distribution sources, we believe there are currently over 15, 000+ TTYs in Australia. The majority of these are owned by Deaf people or rented through the Disability Equipment Program (DEP).

In 1993, AAD produced a report on telecommunications access for Deaf people. A key issue raised was access to advertised TTY numbers. Using the numbers listed in the TTY directory, the research team conducted a total of 77 TTY phone calls to NSW Government departments. A total of 41 numbers (53%) proved to be unreliable in that they were not answered at all or not answered by a TTY (*Wilson, I: pp 76*). There is little evidence to suggest that this situation has improved significantly over the last 9 years.

This is unfair, as Deaf people cannot enjoy quick and effective contact with service staff like those who use voice phones. This issue needs to be addressed to allow Deaf people equal access.

Telstra is actually leading the way in that a dedicated TTY machine no longer is used to answer Disability Equipment Hotline (DEH) calls. In fact, they have recently installed modem software called 'Next Talk' software which enables their computers to talk directly to a TTY or Telebraille machine (used by deafblind people). This product has been imported from the United States of America and modified to Australian standards.

Currently many companies such as Telstra and Optus are providing an 1800 free call number for Deaf people to use to obtain access to disability specific services such as the Disability Equipment Program. At times, these numbers are answered by an answering machine. There are concerns that these numbers are also being used to handle billing, maintenance, service faults, Internet and mobile phone inquiries. The difficulty for Deaf people is that the customer service staff often has to act as a "relay officer" as they do not directly handle these types of inquiries. The telephone call becomes lengthy through this

process. AAD would prefer to see TTY numbers in different departments that deal with these inquiries to enable Deaf people to contact these departments directly.

Information provided by Deaf people during consultation suggests that they prefer to have direct contact with an organisation rather than go through the National Relay Service (NRS). The main reason for this appears to be ownership of the telephone conversation, speed and accuracy of information received.

b) SMS access number

Today, SMS text messaging is extremely popular in the Deaf community due to its ease, simplicity and portability. With Deaf people, like everyone else, SMS brings a sense of equality in that it can be used to communicate with anyone without barriers. SMS is used to communicate with friends, family, work and conduct day to day business. Some Deaf people have managed to sell a car or equipment via SMS in the same way a hearing person uses the phone.

Some sectors of the Deaf community, businesses and emergency services are investigating ways that SMS can be used to enable direct contact with these organisations. Some examples of initiatives include:

- ◆ The Victorian Council of Deaf People (VCOD) in conjunction with the RACV, conducted a trial to establish an SMS Emergency Road Service. DTAN is awaiting the outcome of this trial and is keen for similar services to be established across Australia.
- ◆ The Western Australian and Queensland Police forces have contacted DTAN for advice in setting up an SMS emergency service for Deaf people.
- ◆ The Australian Communication Exchange (ACE) will be conducting a SMS Relay trial in December 2002. SMS Relay will allow SMS messages to be sent to voice telephones, TTYs and other telecommunication devices and vice versa. The trial will address issues such as reliability of SMS server operations, message capacity, emergency situations, use/misuse of SMS Relay and costs. (Information on this can be found at www.aceinfo.net.au)

One major technical drawback to such services being established was highlighted by the Australian Communications Authority in media releases dated 29 January 2002 and more recently on 8 November 2002. Both media statements advised that SMS calls cannot be considered safe as an emergency call tool because of the possibility of delay in receiving a message. SMS is only a message service.

In April 2002, AAD released a discussion paper on “Mobile phones and Deaf people” (*Clark and Harper 2002 pp 2*). One section covered issues such as the need for SMS numbers to be set up and concerns over the current inability of networks to guarantee that messages will be received within 5-10 minutes of it being sent.

A questionnaire was sent out of the community with the discussion paper asking for feedback related to these issues. From the responses received AAD believes that more work needs to be done to improve the delay time in sending/receiving SMS messages. Consideration also needs to be given to setting up direct SMS contact to emergency, road services and other generic government, community and business services. 84% respondents want SMS access to emergency services.

AAD would like to see the telecommunications industry, ACIF and the ACA work together to develop some solutions to enable Deaf people and others to use SMS to obtain access to basic service information or emergency services. Earlier this month, the ACA released a discussion paper "Options for Numbering of Short Message Services (SMS) in Australia". AAD has had input into this discussion paper and we are awaiting the final report from the ACA on this issue. We look forward to the outcomes from this consultation and a new way of accessing information will be opened up to the Deaf community and others consumer groups.

c) IVR services and the 'Text' alternative

Interactive Voice Response (IVR) systems have become a popular way for business community and government services to control telephone traffic from the public inquiring about services.

The IVR allows the service provider to find out what the inquiry is about, before transferring you to a live service operator. Sometimes, you may go through 4 or 5 questions before you reach the live service person.

Currently there are no direct text (TTY) versions of these services. You could try and access them via the National Relay Service; however there are 'timeout' problems because of time delay issues and therefore is not effective.

In February/March 2002, the Australian Bankers Association (ABA) conducted an inquiry into the development of industry standards to make ATMs, EFTPOS and internet banking more accessible to Deaf people and people with disabilities. A recommendation was made that the banking industry consider providing an alternative mechanism to IVR service such as an 'interactive text response' (ITR) service for TTY customers.

AAD looks forward to seeing this initiative implemented. We also encourage mainstream development and access to ITR services.

PHONE CONTACT SOLUTIONS:

In summary, some solutions that could be used to solve concerns about telephone contact include:

- ◆ Direct TTY access to specific departments such as: Billing, Sales, Faults, Complaints, Directory Assistance and Management
- ◆ TTY access via computer using special software products such as “Next talk”
- ◆ SMS access to information services and technical departments
- ◆ Text ‘IVR’ service (ITR)
- ◆ Deafness Awareness Training for all customer service staff as outlined in Retail Centres section.

Information dissemination

Telecommunications companies market a wide range of products and services to the consumer.

a) Accessibility of written information

The way in which this information is provided may be inaccessible to Deaf people because the information may be:

- ◆ Difficult to read – especially for Deaf people whose first language is Auslan.
- ◆ Too generic and not outlining accessibility benefits for Deaf people
- ◆ Stored in a place that may not be visible and customers are not aware that such information exists
- ◆ Too detailed without any diagrams, picture or graphics
- ◆ May not be available in alternative formats suitable to Deaf people such as Auslan video format
- ◆ May not provide a TTY contact number for further information

If information is not provided to Deaf people in an accessible format, it can lead to frustration and purchase of the wrong equipment. Ideally, AAD would like to see companies developing videos which explain products and services in Auslan or with closed captions to ensure Deaf people are able to access information easily, quickly and in their preferred language. This is the equivalent of printed material being provided in other language for people from Non-English Speaking Backgrounds (NESB).

In the UK, Chase Productions (www.chasevideo.co.uk) is a company that develops information videos for adults, children using Deaf presenters and in BSL using video formats that suit Deaf people. They also provide sign language interpreter translation of Channel 4 programs in BSL for Deaf school children.

In Australia, Telstra produced a video “*No worries, No hassles*” in 1999, providing Deaf people with information about its Disability Equipment Program. This video is still available and is provided free of charge to people who request it. In 1991, Austel (now Australian Communications Authority) produced a video in Auslan and presented by a Deaf person explaining the options available under the deregulation of the telecommunications market (the introduction of Optus and the new numbering plan).

Once again, these videos were provided free of charge and distributed widely to members of the Deaf community.

b) Availability of information

One concern that AAD has is that often brochures are printed and distributed to retail centres only to be placed on shelves that are out of sight. Deaf people often have to request the information prior to arriving in the shop. If they are unaware that such a brochure exists, the customer service staff may also be unaware and an opportunity to receive vital information is lost.

Brochures, videos and other information should be provided to organisations that work with Deaf people on a regular basis to ensure information is displayed on information stands and targeted to Deaf people. Regular advertisements could be placed in magazines and community newsletters for a small fee as a means of providing information to these communities.

Another possibility is the provision of a 'fax back' service and have brochures listed clearly on the list of 'fax back' sheets available. If Deaf people are aware of how to use these services, this could be a very useful service for the community as many people have personal fax machines at home to communicate with generic businesses and family members who live outside local call area codes.

c) Service/Product contracts

In recent years, there have been concerns raised about the complexity of mobile phone contracts. Young people and people with disabilities are vulnerable when it comes to understanding the complexity of these contracts. Mobile phone contracts are difficult to understand (for anyone) and when no sign language interpreters or plain English versions of contract are available, then Deaf people are severely limited in knowing their rights and responsibilities when owning a mobile phone. Issues such as purchasing a mobile phone, 'cooling -off' period and pricing plans are often misunderstood. AAD has raised this issue with the Australian Mobile Telecommunications Association (AMTA) who are currently working on this issue with the mobile phone industry.

This concern was raised in the discussion paper "Mobile Phones and Deaf people" (Clark and Harper 2002, pp 7) mentioned earlier in this paper. The summary response clearly outlines that Deaf people are dissatisfied with the way mobile phone contracts are written and shows clearly that they often sign contracts without having appropriate access to understand what sort of agreement they have with the service provider. 86% want better access to information about mobile phone services and contracts.

d) Websites

During 2001, the Department of Communications, Information Technology and the Arts (DCITA) funded a project called the "Deaf Australia Online". This project investigated

placing Auslan video clips on websites. A trial was conducted with Optus which placed on the website an Auslan video clip about its Disability Equipment Program. The response from Deaf people was overwhelming positive; however difficult download requirements currently make it very slow for the average computer user to access such information quickly.

In January 2001, the World Wide Web Consortium (W3C) set down technical requirements and guidelines called the Web Accessibility Initiative (WAI) and released a document "How People with Disabilities Use the Web". This standard can be found at www.w3.org/WAI/gettingstarted.html. Standards listed that related to accessibility for Deaf people include:

- ◆ Captions or transcripts of audio information on the web
- ◆ Content related images in pages full of text, to assist people whose first language is sign language instead of written/spoken language
- ◆ Voice input requirement to access websites

Source: www.w3.org/WAI/EO/Drafts/PWD-Use-Web/Overview.html

The links for web developers to access to ensure that their websites meet the above requirements are WCAG.1.0 Checkpoint 1.1 (www.w3.org/TR/WCAG10/#tech-text-equivalent)

INFORMATION DISSEMINATION SOLUTIONS:

Some strategies that could be implemented to processes relating to information dissemination include:

- ◆ Plain English version of all documents
- ◆ Regular information advertisements placed in Deaf community magazines
- ◆ Plenty of visual material/graphics and diagrams
- ◆ Wide dissemination through Deaf organisations
- ◆ Clear accessible display in Retail Centre shops
- ◆ Information videos produced in Auslan or closed captioned.
- ◆ User friendly websites including Auslan video clips

The above suggestions are also applicable to the accessibility of corporate and community information and website facilities to enable access for Deaf people.

Equipment provision

a) Accessibility

Many products and equipment that are provided to the community are not accessible to Deaf people or people with disabilities. Telecommunication equipment that enables connection to the telephone network was inaccessible until the early 1980's when the

TTY was first imported from the USA. Since the *Telstra vs. Scott* case, telecommunications companies have provided TTYs as an alternative to the standard telephone. Telstra recently announced the addition of 2 products for Deaf/blind and Deaf people with vision impairment – the Braille TTY and TTY with Large Visual Display (LVD) that will soon be available through their DEP.

Other examples of equipment that would be useful for Deaf people but are inaccessible include:

- ◆ Nokia 9210 Communicator and other mobile devices with TTY application
- ◆ Videotelephony devices (currently accessible but not affordable for most Deaf people)

AAD and other organisations have already alerted the industry to the need for mobile phones and some PDA's to include TTY connectivity (using V.18 protocol). This is currently available in Europe with Nokia 9210 mobiles.

In July 2002, the House of Representatives Standing Committee on Communications, Information Technology and the Arts conducted an inquiry into Wireless Broadband Technology. AAD, Australian Communication Exchange (ACE) and TEDICORE all put forward submissions to the inquiry. One of the key issues raised was the need for Deaf people to have TTY access via mobile phones. In the report on the inquiry released in November 2002, the committee made one clear recommendation.

“that the Commonwealth develop the means to provide hearing impaired people with mobile telephones compatible with hearing aids, portable wireless devices that can communicate through the National Relay Service, and appropriate adapted video compression and transmission technology for video communication using sign language.” (Connecting Australia! Wireless Broadband pp xvi)

b) Affordability

The Disability Equipment Program (DEP) provided by Telstra includes a range of equipment for Deaf people and people with a disability. Such equipment is provided at the normal rental rate available for all others connected to the Telstra network.

However, if a Deaf person on low income is eligible to access Telstra's excellent “Incontact” program, which provides them with a fixed home phone line and the ability to receive telephone calls. They would be required to purchase their own TTY (\$1090). A hearing person who was eligible for same product would just need to purchase a standard handset, which is fairly cheap. This is inequitable.

In October 2002, AAD released its fourth discussion paper “Telecommunication Affordability issues for Deaf people.” This discussion paper highlighted some concerns that AAD has on affordability (www.aad.org.au/publications.html)

These issues are as follows:

- ◆ Long distance call costs
- ◆ Mobile SMS message costs
- ◆ Broadband access costs
- ◆ Telecommunication equipment costs.

c) Disability Equipment Program

The Telstra DEP provides the largest telecommunication equipment range available for Deaf and hard of hearing people and people with disabilities. Optus currently supplies a TTY and will soon offer a volume control handset, but does not provide a visual alert system. Some Carriage Service Providers (CSP) do not provide accessible equipment and are therefore not complying with the Act. The list of equipment available is based on the provisions of the *Telecommunications (Equipment for the Disabled) regulations 1998*. This list is a fixed list and does not require the CSP to provide alternative equipment and meet individual needs.

Technology changes at a fast rate and products become obsolete very quickly. Deaf people have the right to access modern technology that will best meet their needs. The DEP needs to accommodate these changing needs and allow for inclusion of products such as a mobile TTY. This issue was again raised in our discussion paper “Mobile Phones and Deaf people” (Clark and Harper 2002, pp 7). The questionnaire attached to the discussion paper provided an insight on whether Deaf people thought a mobile phone with TTY connectivity should be included in the Disability Equipment Program.

The response showed that 80% of people were keen to have mobile phones with TTY connectivity provided as part of the DEP. From comments received, it appears that the 6% of respondents, who were unsure as they have never seen the equipment and are unsure if it will be of benefit.

This issue was also raised again in our “Emerging Technology” discussion paper (Clark and Harper, 2002 pp5). The questionnaire attached to the discussion paper asked if the Nokia Communicator should be part of the Disability Equipment Program. An overwhelming 85% were in favour of this idea.

After community consultation, AAD produced a position paper on how the Disability Equipment Program should be delivered in the future. The requirements outlined are:

- ◆ A National comprehensive DEP program including program awareness, information, equipment choice, equipment provision, installation, training and on going support.
- ◆ A wide choice of equipment to meet needs of Deaf people
- ◆ Ability to hire equipment for long and/or short term use
- ◆ Must employ Deaf people to assist with providing services and be aware of Deaf issues*
- ◆ Able to access any CSP and choose a plan that suits Deaf person
- ◆ Consumer controlled and managed.
- ◆ Ongoing equipment training and installation to customers
- ◆ Funded through Universal Service Obligations from all CSP's
- ◆ Liaise closely with ACA, DCITA, ACIF and CSP's in terms of new equipment becoming available

**This principle is consistent with CSP's in the UK, Canada and USA, where Deaf staff are employed to assist service provision.*

d) Involvement in telecommunication technology Design/Compatibility to suit the Deaf Consumer

As new technology is developed and new products are introduced, it is vital that AAD through DTAN be consulted to ensure equipment is compatible and user friendly for Deaf people.

In the past, this has not occurred often enough and it has meant that Deaf people have missed out on getting equal access to new technology. An example of this is when Australia mobile telephone network moved from 'analogue' (AMPS) to 'digital' (GSM) in the year 2000.

When mobile phones using the analogue service were introduced in Australia, Deaf people were able to use the old 'brick' version of mobiles with their TTYs to make calls to other TTYs. This meant that for the first time, Deaf people were able to access phone communication outside a fixed line setting and communicate with people while 'on the move'. Most importantly, it enabled Deaf people to have access to the phone when they were shopping, travelling or for emergency situations (ie a car breakdown).

When the AMPS network shut down, Deaf people were no longer able to use their mobile phones. They had to switch to a GSM mobile. The problem with GSM mobiles is that they are not compatible with TTYs and Deaf people could no longer make telephone calls.

To ensure such a disastrous situation does not arise again in the future, it is vital that Deaf people and people with disabilities are consulted from the beginning to ensure that their needs are included in the final stages of development.

e) Emerging Technology

New telecommunication products are coming onto the market and are evolving all the time. It is important that the DTAN Project monitor, trial and ensure these products are accessible to the Australian Deaf Community. Some examples of current emerging technology include:

- ◆ Videotelephony (eg videophones, Video over IP)
- ◆ Signing avatars
- ◆ Smart internet technology

More details available in our “Emerging Technology” discussion paper at our website: www.aad.org.au/publications.html

Telecommunications companies need to ensure the types of products on offer are:

- ◆ Affordable
- ◆ Have specific “Deaf friendly” features
- ◆ There are ‘top end’ and ‘bottom end’ versions of the product
- ◆ Wide choice of equipment and brands.

Services

a) Affordability

Affordability of services is a critical issue for AAD and the Deaf community. Compared to other Western countries, Deaf people in Australia still pay inequitable telephone usage and network charge costs. For example, STD call charges.

An important finding from the research project mentioned earlier in this paper and conducted by Wilson (1993) was that there was an urgent need to establish a regulatory framework for telecommunications access. In particular, to provide improved services to TTY users including ‘a call charge concession to reimburse TTY users and relay users for the extra time taken to make TTY calls’ (page 7). TTY to TTY calls take 6-10 times longer than voice calls.

Since the production of the report, the Federal Government allocated funding to establish a National Relay Service (NRS) in 1995. This was a significant step towards enabling access between Deaf and hearing people and it included a 30% discount for long distance calls acknowledging the greater length of time and subsequent cost of long distance TTY calls.

It is ironic that the Government did not also acknowledge this for TTY users using local carrier networks to make long distance TTY to TTY calls with a subsidy scheme through the Universal Service Obligation (USO).

AAD is aware that the United Kingdom, some European countries, Canada and the United States of America provide telecommunication carrier based or government subsidised discount programs to ensure a fairer pricing scheme for direct TTY to TTY calls and TTY relay service calls.

Other examples of services that have high costs include:

- ◆ Mobile phone SMS charges (tailored pricing plans)
- ◆ Broadband connection and usage
- ◆ Videotelephony network charges

Companies need to work with the Deaf community to ensure that services that will benefit them are not priced out of reach. A discussion paper on affordability, which provides a detailed analysis the issues that affect the Deaf community, can be found at www.aad.org.au/publications.

b) Emergency Access

Emergency access is a critical issue that the Federal Government, Australian Community Authority and AAD are all keen to see accessible from any place and at any time. Currently, the NRS provides a text-to-text Emergency service called '106'. This service enables Deaf people to access fire, police and ambulance emergency services in the same way other Australian access the '000' number.

However, to access this number, Deaf people need to be near a TTY. If a Deaf person is on the road, shopping or has an accident they will not be near a TTY and are therefore are unable to use Emergency services.

Deaf people need to get access to a mobile TTY that will enable them to contact emergency services from anywhere and at anytime. As mentioned earlier, the Nokia 9210 Communicator is available in Australia but does not have TTY connectivity as it does in Europe.

c) Complaints Handling

Currently for if anyone (including Deaf people) wants to make a complaint about a service they must put that in writing. For Deaf people who use Auslan, this is very difficult as they often do not have the English skills to write such letters, nor are they confident in making a complaint about services that they receive.

Other ways of making complaints need to be opened up such as face to face contact or acceptance of a complaint via a TTY or email. However, both these formats are text based, which again is a problem for Deaf people who use Auslan.

d) Availability of services to regional and rural areas

AAD is aware that Telstra is beginning to roll out wireless local loops (WLL) to rural and remote areas. The WLL is incompatible with current TTYs that are available in Australia. AAD has grave concerns that the deployment will impact on the ability of Deaf people in these regions to access basic telephone services in areas that will be serviced by a wireless local loop. This decision was made without any consultation with the Deaf community and there are serious concerns that Deaf people in remote areas could be denied basic telephone services.

Advice from the Australian Communications Authority (ACA) has determined that current legislation, *Telecommunications (Consumer Protection and Service Standards) Act 1999* allows Telstra to install the WLL technology to regions it deems appropriate. The legislation requires that the basic telephone services must be provided to a person's residential and business premises. However, this is a short-sighted view and does not take into account the following situations:

- ◆ The home is sold and the person moves to a new residence that has the WLL installed, they will not be able to use their TTY in the new place of residence for a considerable length of time.
- ◆ A family member loses their hearing at some point in their lives and cannot access a TTY as the home has WLL access.
- ◆ Business travellers or community tourists visiting the town will not be able to use a TTY from a hotel room, hospital, or ring the TTY emergency service number 106.
- ◆ There are only 170+ TTY Payphones which are not publicised widely enough (ie in community information centres, hospitals, hotel room information packs) to ensure Deaf people are familiar with their locations and these locations are currently not accessible 24 hours a day /7 days a week.
- ◆ Deaf people who live in the area will not be able to make telephone calls from any other place other than home or work. They will not be able to make a call from the local hospital, shopping centre, railway station or from the house of a hearing friend.

SERVICES SOLUTIONS:

Some solutions that can be implemented are:

- ◆ Ongoing consultation with AAD/DTAN regarding affordability issues for the Deaf community
- ◆ Ongoing discussion and research into improving Deaf peoples access to emergency services.
- ◆ Develop improvements to formats for lodging complaints about services such as face to face contact, TTY or email lodgement.
- ◆ Introduction of the ITU (International Telecommunication Union) V.18* standard on mobile phones such as Nokia 9000 range or palm top computers (PDA's) to allow communication with TTYs.

* The ITU V.18 standard is a technical specification creating gateways for different text protocols such as baudot (TTY), ASCII (computers) and DTMF. Currently in Europe V.18 has been adopted and allows for greater cross networking between many different text telecommunication applications.

Conclusion

Access to telecommunications services is critical for any consumer. For Deaf people, telecommunications services have, up until the last 10 years, largely been inaccessible to Deaf people.

Since the *Telstra vs. Scott* case, companies have started to respond more readily to the needs of the Deaf community. However, we still have a long way to go before Deaf people can enjoy the same level of service as other Australians.

Recently, the Human Rights and Equal Opportunity Commission (HREOC) released a call for expressions of interest from interested consultants to prepare a discussion paper on Telecommunications Access for people with disabilities. This expression of interest is timely and places pressure on telecommunications companies to respond to the needs of the disability community.

Currently, the *Disability Discrimination Act 1992*, is the only avenue that Deaf people to lobby for equal access to telecommunications services. Ideally, AAD would prefer to work with industry, government and other likeminded community organisations to achieve real outcomes for the Deaf community. However, to date, negotiations have been slow and tedious and only real action has occurred once a complaint has been lodged with HREOC.

It is hoped that with the release of this paper which has attempted to outline the issues as well as provide some practical solutions all parties will be willing to have a 'round table' discussion to address some of the issues raised.

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