

Regulation Cell, Corporate Office
5th Floor, Bharat Sanchar Bhawan,
Harish Chandra Mathur Lane, Janpath
New Delhi - 110001
Tel: 011 - 23739295 Fax: 011 - 23734081
e-mail : agmregln@gmail.com



भारत संचार निगम लिमिटेड
(भारत सरकार का उपक्रम)
BHARAT SANCHAR NIGAM LIMITED
(A Govt. of India Enterprise)

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To
The Advisor (CA&IT)
Telecom Regulatory Authority of India,
Mahanagar Door Sanchar Bhawan,
Jawahar Lal Nehru Marg, (Minto Road),
New Delhi-110002

Banzal 24/1/18
JA(CA)
PA(CA)/
SO (Banzal)

No. Regln/1-13/2012/~~571~~ 5712 dated: 18-01-2018

Sir, {Kind attention: Sh. Sanjeev Banzal, Advisor (CA&IT), TRAI}

Sub:- BSNL's reply on TRAI Consultation Paper on "Making ICT Accessible for Persons with Disabilities"

Kindly refer to the TRAI press release no.107/2017 and Consultation Paper Consultation Paper no.17/2017 dated 20-12-2017 on 'Making ICT Accessible for Persons with Disabilities'. In this context, BSNL's comments are as follows.

Q1. Which are the disabilities, with specific accessibility requirement, other than those mentioned in para 2.3 that require consideration for preparing a framework?

BSNL's Reply: Apart from disabilities mentioned at para 2.3a, Physical impairment who have limited muscle control like paralysis, pain that impedes movement should also be included. Further, autism-spectrum disorders, may also be considered in cognitive disabilities.

Q2. Apart from the challenges enumerated in para 2.3, what other challenges do PwDs face while accessing telecommunication and broadcasting services?

BSNL's Reply: No comment

Q3. In your opinion, what are the reasons for the desired benefits of ICT (telecom and broadcasting) not reaching the PwDs despite several policy measures and scheme being implemented?

BSNL's Reply: Non-Awareness of new developments of ICT to help PwDs in using the services.

Q4. What additional or corrective measures can be taken by the Government to enable better access to telecommunication and broadcasting services and devices to PwDs? Please give a rationale for your response.

BSNL's Reply: Increase public awareness and understanding of disability. Governments, voluntary organizations, and professional associations, different media houses, jointly involve / running marketing campaigns at grass root level for spreading awareness about the services & policies for PwD and availability of ICT tools for PwDs.

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Q5. Apart from the measures suggested by ITU, what additional measures can be taken by the TSPs and equipment vendors/suppliers and other stakeholders to address the challenges faced by PwDs while accessing telecom and broadcasting services?

BSNL's Reply: A centralised database needs to be created/maintained segregating kind of disabilities, where PwD can register their name, mobile number with the impairment & mode of communication so that in future they can get the benefits through that mode about the services & benefits.

Easy to use Android/IOS applications should also be designed for them.

Q6: What are the areas where collaboration between various stakeholders would be useful and how?

BSNL's Reply: One of the areas can be PwD friendly handset development & manufacturing. Other areas can be content provision for PwDs

Q7: Should the Government/TRAI direct the telecom and broadcasting service providers to provide information pertaining to billing, usage, pricing and contracts in the form accessible to PwDs? Please provide a rationale for your response.

BSNL's Reply: Can be explored

Q8: Should the Government/TRAI mandate that the devices used for watching television provided through cable, satellite/DTH, fibre, etc. should be made accessible to PwDs?

BSNL's Reply: No comments

Q9. Should international accessibility standards be adopted for telecommunication and broadcasting services and devices in India? Please suggest steps required to ensure their adoption by the service providers/device manufacturers.

BSNL's Reply: Can be adopted but needs to be explored

Q10. What additional measures can be taken or technologies can be deployed by service providers or equipment manufactures to assist PwDs?

BSNL's Reply: Special handset with easy to use in built app can be designed for different impaired PwDs.

Q11 Should device manufacturers be mandated to allow in their device's operating system those applications which are meant to assist the PwDs? Please justify your response.

BSNL's Reply: Mandating device manufacturers to allow in their device's operating system, the applications which are meant to assist PwDs could be another way apart from manufacturing special easy to use devices/handsets for PwDs.

Q12. What measures can be taken in India so that emergency services are made more accessible for PwDs? Should the implementation of these measures by TSPs be made mandatory by the Government?

BSNL's Reply: Repetitive pressing of single digit twice (as finalised by the authority) be made as emergency number that trigger SMS & send information to the registered mobile for support including police & hospital.

Q13. Should the device/handset manufacturer be mandated to manufacture atleast one model of handsets for PwDs which is having accessibility features and which are compatible with assistive technology features such as hearing and visual aids including emergency buttons etc.?

BSNL's Reply: No comment.

Q14: How should companies be encouraged to utilise their CSR funds for development of applications, devices and services for the PwDs? What kind of devices and applications can be envisaged/designed to make achieve ICT accessibility for PwDs?

BSNL's Reply: Yes, The type of devices & applications can be developed in innovative way using CSR funds.

Q15. Should any other funding mechanism for the development of applications, devices and services meant for the PwDs be considered? Please give a rationale for your response.

BSNL's Reply: No comment.

Q16. How can effective campaigns be designed to create awareness about use of ICT accessibility tools? Can such campaigns be funded by CSR funds? If not, what other mechanisms can be used to fund such campaigns?

BSNL's Reply: Campaigning as given in Q14, Yes these can be funded through CSR.

Q17. Should the Government incentivize the manufacturing and development of ICT tools and devices viz. tools for mobile accessibility, TV accessibility or for web accessibility for PwDs? Please give a rationale for your answer.

BSNL's Reply: It may be beneficial, can be explored

Q18. Please give inputs/suggestions/comments on any other issues which you feel are relevant to the subject matter.

BSNL's Reply: No comment.


18.1.18
(Ved Prakash Verma)
AGM (RegIn-II)