Making Information and Communication Technology (ICT) Accessible for Persons with Disabilities (PWDs)

Comments and Recommendations

Government of Tripura

Comments

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

- Whenever a new ICT and network technology is proposed for introduction into PWDs, then a new class of PWD customer equipment is required for its access;
- Whenever a network technology is proposed to be removed,there shall be a disability impact analysis to assess the impact of the change in technology on people with disabilities.

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

- **People with speech impairments**, if unable to communicate verbally, could use TTYs. However, these same individuals face additional barriers if they have physical disabilities that prevent them from using the teletypewriters (TTY) effectively. Many of these individuals can benefit from the Speech-To-Speech Relay System, a system in which communications assistants (trained speech and language recognition specialists) are provided for people with speech disabilities and others who speak unclear English.

- **People with mobility impairments** may be unable to use the controls on the telephone. Several devices have been developed to assist people who have mobility impairments in using the telephone. They include automatic memory dialers, dialing aids, large add-on push buttons, large-number overlays, raised face plates, touch tone transmitters, and other devices.

- **People with blindness or low vision** may have difficulty locating appropriate controls on telephone devices. These same individuals may be excluded if devices provide information via a visual display. Several devices have been developed to assist people who are blind in using the telephone. They include

Braille TTYs, telephones with Braille markings, voice-activated telephones, voice output telephones, and voice output caller ID, among other devices.

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 beingimplemented?

The reasons are :

- Unable to identify the extent to which person with disabilities are embracing use of the Internet;

- Unable to recognise how PWD use of the Internet compares with the Internet uses of the rest of the population;

- Unable to analyse how having a disability relates to and interacts with other social statuses (e.g. socioeconomic status, age, gender) with regard to Internet use; and (4) what explains these trends.

Q4: What additional or corrective measures can be taken bythe Government to enable better access to telecommunicationand broadcasting services and devices to PwDs? Please give arationale for your response.

The increasing spread of the ICT and Internet holds much potential for enhancing opportunities for people with disabilities. However, scarce evidence exists to suggest that people with disabilities are, in fact, participating in these new developments. Government may focus on the spread of information technologies (IT) which increase equality by offering opportunities for people with disabilities and also towards a growing reliance on IT lead to more inequality by leaving behind certain portions of the population including people with disabilities.

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

The Telecom Service providers may focus on the below mentioned area:

Price of SMS chargesfor people who are deaf or hearing/speech impaired may be considered. .The SMS charges may be reviewed as compared with the cost of voice calls, whilst having regard to the objective of the policyto ensure non-discriminatory access to goods, services and facilities by requiring reasonable adjustments unless an unjustifiable hardship would result.

Q6. What are the areas where collaboration between variousstakeholders would be useful and how?

Expansion of current disability equipment programs within the various stakeholders will add value. The Stakeholders may consider the below mentioned areas:

- The telecommunications policy be examined, and modified if necessary, to ensure that mobile phone networks and future access networks are accessible to people with disabilities.

- The Telstra and Optus Disability Equipment Programs should be expanded to include mobile phones and required accessories at equitable rates.

- Vodafone and other TSPs offering mobile communications should provide DEP access to their customers at equitable rates, either by establishing their own programs or by wholesale arrangements with Telstra or Optus.

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.

No Comments.

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?

No Comments.

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

The Telecommunications disability standard may be adopted. Government may consider to provide advice to the TSP on the benefits, for both the telecommunications industry and consumers with disabilities, of a more comprehensive telecommunications disability standard to replace IS040:2001. Protection and Service Standards Act amy aims to promote the interests of consumers and achieve equitable service access across the country.

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

No Comments.

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

Manufacturers should encourage research and development to enable TTYs, Operating systems and other text telephones to work over the GSM and CDMA networks. Research must include user testing as an integral component, to ensure that outcomes are user friendly as well as technically sound for the PWDs.. The TTY does not work over the GSM or CDMA cellular networks, from behind the analogue/digital interface of many switchboards, and with emerging network access technologies such as Wireless Local Loop. The opportunities for real-time text connectivity for Deaf people and people with hearing/speech impairments are decreasing, whilst community expectations for anywhere, any time communication are rapidly increasing. SMS has been a boon for people who rely on text communication but it is relatively expensive, does not give real-time communication, and is without any guarantee of service quality.

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

Text-based access to the Emergency Call Service may be considered. TSP should give consideration to matters around the right of equitable access by Deaf people and people with hearing/speech impairments to the Emergency Call Service, particularly access from mobile phones, having regard to the Objects of the policy and the responsibilities conferred on Standard Telephone Service providers.

Q13. Should the device/handset manufacturer be mandated to manufacture at least 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?

No Comments.

14. How should companies be encouraged to utilise their CSRfunds for development of applications, devices and services for the PwDs?

Besides CSR initiatives solely undertaken by private firms, forms of collaboration in the area of CSR may be considered with public sector organizations within public-private partnerships and policy networks. While public sector primary task concerns mapping societal and environmental needs, private sector firms engage primarily in financing and executing CSR interventions for the PWDs.

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.

No Comments.

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?

No Comments.

Q17. Should the Government incentivise 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.

No Comments.

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

No Comments.

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