

Reply on the TRAI's consultation paper on "Making Information and Communication Technology (ICT) Accessible for Persons with Disabilities"

Q 1. Which are the disabilities, with specific accessibility requirement, other than those mentioned in para 2.3 of the consultation paper that require consideration for preparing a framework?

-Para 2.3 have mentioned and covered all different types of disabilities.

Q 2. Apart from the challenges enumerated in para 2.3, what other challenges do pwds face while accessing telecommunication and broadcasting services.

-Para 2.3 have mentioned clear enough of all the challenges faced by PwDs.

Q. 3. 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?

- Despite the fact that several provisions and policy measures are being implemented, the ICT is yet to be reached to PwDs at most of the level. This may be mainly due to absent of checking mechanism as to whether the implementation of such policies and measures been taken place at the ground level to ensure that the PwDs have equal access to any kind ICT. Such checking authority should be entrusted with the authority to take action against the implementing agency for non-adherences.

Q. 4. 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.

- There are a variety of ways through which the government can implement ICT accessibility amongst their ministries and departments, as well as industry

actors. Including accessibility as a precondition of a licence can be an effective way of ensuring accessibility of a product or service. These could be in the form of mandatory policies, negative measures such as imposing a penalty for non-adherence, or positive measures such as offering incentives such as tax breaks, preferred choice in tenders, instituting awards etc. The government may authorize its department to take necessary measures to ensure the effective implementation of such terms.

Q. 5. Apart from 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?

- The ITU suggestions have covered all the major requirements for accessibility, with the implementations of such measures it should be kept mandatory for all the vendors/suppliers that thorough study of the actual desired and requirements of the PwDs at the ground level.

Q. 6. What are the areas where collaboration between various stake holders would be useful and how?

- Government authorities must spend time, effort and money variously on raising awareness among their own employees and the public of the need to create an inclusive and barrier-free society. Also provide training for stakeholders on accessibility issues facing by persons with disabilities and sensitise the staff to respond to the needs of persons with disabilities. Carry out capacity-building activities such as accessibility training to facilitate implementation of accessibility; support DPOs and NGOs in aiding persons with disabilities would be a great help in making ICT accessible.

Q. 7. 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.

- Yes, the government/TRAI may direct the telecom and broadcasting service providers to provide information pertaining to billing, usage and contracts in the form accessible to PwDs so as to maintain full participation of the PwDs in all aspects of life.

Q. 8. 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?

- Yes, It is highly desirable that the Government/TRAI mandate that the devices used for watching television provided through cable, satellite/DTH, fibre, etc. should be made accessible to PwDs with a strong legislative framework with detailed recommendations on accessible services. Government contracts or licences, governments may include accessibility as necessary criteria, especially in the issue of wireless and broadcast licences. Breach of licence terms can result in termination of contract or imposition of penalty with a time frame to ensure compliance.

Q. 9. 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.

- Yes, highly recommended. Steps to be taken may be highlighted after inspecting the different practices and process followed in different countries.

Q. 10. What additional measures can be taken or technologies can be deployed by service providers or equipment manufactures to assist PwDs?

- Occasional training on the usage of ICT may be imparted to the PwDs by the agencies and educate them at different level. For such activities, the agencies may be compensated later for the cost of providing such training and the agencies may be graded on the regularity of such conducts.

Q. 11. Should device manufacturers be mandated to allow in their device's operating system those applications which are meant to assist PwDs? Please justify your response.

- Yes.

Q. 12. 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?

- Persons with disabilities are one of the most disadvantaged communities during times of emergency, since the communications divide, coupled with inaccessible response systems, facilities and services makes it impossible for them to be included in any emergency or disaster service. Therefore, such is the case, the government must make it mandatory of all the emergency services be made accessible for PwDs in every way possible for all the different disabilities. For instant, all the emergency communications services me be equipped with relay services.

Yes, Measures by TSPs be made mandatory by the Government.

Q. 13. Should the device/handset manufacturer be mandated to manufacture at least one model of handsets for PwDs which is ohaveinh accessible feature and

which are compatible with assistive technology features such as hearing and visual aids including emergency buttons?

- Yes

Q. 14. How should companies be encouraged to utilize their CSR fund for development of applications, devices and services for the PwDs? What kind devices and applications can be envisaged/designed to make achieve ICT accessibility for PwDs?

- The provisions for the PwDs in the Corporate Social Responsibility (CSR) may be adjusted to concentrated on the participation and development of the PwDs.

Q. 15. 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.

- Corporate social responsibility (CSR) initiatives are also a good source for funding ICT accessibility. Other than CSR, the ministry or department responsible for the implementation of the national disability policy should itself have a budget from which it can disburse funds to persons with disabilities or their organizations for various activities

Q. 16. How can an effective campaigns be designed to create awareness about the 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?

- Occasional training may be conducted on the usage of ICT at different level in collaborations with Disabled Person Organisation (DPOs) and NGOs. Carry out capacity building activities such as accessibility training to facilitate implementation of accessibility. Engage in research and development of low-cost

indigenous supportive solutions in local languages to cater to local needs and build up the capacity of trainers and resource centres to train people in using these technologies may help create an effective awareness campaign on ICT accessibility tools.

For such awareness campaign, the CSR fund should be made available.

Q. 17. Should the Government incentives 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.

- The government may create measures in the form of mandatory policies, negative measures such as imposing a penalty for non-adherence, or positive measures such as offering incentives such as tax breaks, preferred choice in tenders, instituting awards etc.