Communications accessibility: 2016 and beyond

Consultation paper

March 2016

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Context

The Australian Government is committed to reform to encourage innovation and boost productivity across the economy. Implementation of its reform agenda is an ongoing initiative, and from time to time the Government will engage stakeholders on issues and options where areas that could benefit from reform are identified.

The Department of Communications and the Arts is the Australian Government's pre-eminent advisor on communications. The Department is responsible for developing policy advice and initiatives that help all Australians, including Australians with disability, to realise the full potential of digital technologies and communication services.

The Australian Bureau of Statistics (ABS) estimated in 2012 that 4.2 million people currently live with some form of disability, representing nearly 20 per cent of the Australian population. Of this figure, 1.4 million Australians were identified as having a profound or severe limitation affecting their mobility, self-care or communication.

The Australian Government is committed to supporting Australians living with disability. Australia ratified the United Nations Convention of the Rights of Persons with Disability on 17 July 2008, with a National Disability Strategy 2012-2020 (NDS) subsequently agreed between the Commonwealth and State governments.

Provision of the National Relay Service (NRS) is a long-standing initiative by the Australian Government in addressing communications accessibility issues for people who are deaf, hearing and/or speech-impaired. The introduction of a number of innovative improvements to the NRS in the last two-and-a-half years has led to increased demand for the service.

The Department is aware of communications accessibility developments made available by other Government initiatives, such as the rollout of the National Disability Insurance Scheme (NDIS), the National Broadband Network (NBN) and the development of digital services by the Digital Transition Office (DTO). Many of these improvements can be accessed through mainstream communication technologies and services.

Encouraging and enabling adoption of these improved accessible service options will provide substantial opportunities to improve the overall quality of life for people with disability. Use of alternative service options will also assist in maintaining the sustainability of the NRS as a safety net communication option for Australians who are deaf, hearing and/or speech impaired, through spreading the demand for accessible services across a wide array of options.

Scope

The scope of this paper is restricted to consideration of accessibility issues relating to telecommunication services.

This paper and consultation process considers the impacts of a rapidly changing communications environment on the existing communications accessibility framework and identifies possible opportunities arising from technological changes to support the sustainability of the NRS and improve communications options for people with a disability.

However, it is important to note that this paper is not suggesting preferred approaches, or making specific recommendations. Through this paper the Department encourages discussion on the issues raised for consideration in this paper.

Submissions on the options raised in this paper are invited by 6 May 2016.

To make a submission, please email accessibility@communications.gov.au or write to The Manager, Communications Accessibility, PO Box 13310, Law Courts, Melbourne VIC 8010

If you would like your submission to be kept confidential, please note this in your submission.

1.   An overview of the communications accessibility framework

Ensuring access to telecommunications for Australians who are deaf or have a speech or hearing impairment has been a focus of Government policy for many years.

The legislative obligations under the *Telecommunications (Consumer Protection and Service Standards) Act 1999* (TCPSS Act*)* establish a universal service regime, with the purpose of ensuring that all people in Australia, wherever they reside or carry on business, should have reasonable access on an equitable basis to standard telephone services.

Section 6 of the TCPSS Act defines the standard telephone service in Australia as being:

* A telephone service fit for the purpose of voice telephony; and
* If voice telephony is impractical for a person with disability, a form of communication that is equivalent to voice telephony.

Further policy and regulation has been developed to provide access to affordable telecommunications services for Australians with a disability, targeted at three key areas:

* Equipment – through regulation to ensure that arrangements were in place to ensure equipment to access standard telecommunication services was available and affordable;
* Services –initiatives to ensure there is service for people with a disability to communicate with business, family and friends (primarily through the NRS);
* Skills – initiatives in place to provide information and training to help consumers utilise and enjoy the benefits of telecommunications.

Equipment

Disability equipment programs, underpinned by regulation, provide affordable access to specialised equipment to make and receive telephone calls.

The *Telecommunications (Equipment for the Disabled) Regulations 1998 (Regulations)* require Universal Service providers (currently Telstra) to provide customer equipment that allows people with a disability to have access to a standard telephone service, with a specific obligation for equipment that allows customers to use the NRS. Telstra conducts a disability equipment program to meet its obligations as the Universal Service Provider.

To qualify for Telstra's disability equipment program an individual must be a Telstra retail customer, or associate of a Telstra retail customer, with a disability or impairment that means the standard telephone handset cannot be used. The customer must complete a disability equipment program application form and have it signed and authorised by an appropriately qualified professional for the disability. One or more products under the disability equipment program will cost the same annual rental fee as for a standard rental handset ($3 per month or $36 per annum).

Qualification for access to Optus' disability equipment program is restricted to serviceable customers in Optus cabled areas in Sydney, Brisbane and Melbourne, with equipment provided at a monthly rental cost of $2.75.

Telstra and Optus are the only telecommunication service providers to have a Disability Discrimination Act Action Plan (DAP) registered with the Australian Human Rights Commission (noting that compliance with requirements of the Disability Discrimination Act is general obligation for all businesses). Provision of disability equipment programs for their respective customers are included in both the Telstra and Optus DAPs.

Details of the specific pieces of equipment currently available through the Telstra and Optus disability equipment program can be found at **Attachment A.** Telstra offers a broader range of devices, including accessory devices as well as telephones and teletypewriters (TTYs) in the program.

Funding of the provision of both disability equipment programs comes directly from the company's commercial operations. There is no government or levy funding provided to telecommunications providers for such schemes.

National Disability Insurance Scheme

The National Disability Insurance Scheme (NDIS) supports people with a permanent and significant disability. A key focus of the scheme is identifying support options to help people with disability to achieve education, employment and health and wellbeing goals. Participants must be less than 65 years of age when first accessing the scheme.

Communication devices may be available to participants in the scheme to provide support in meeting their goals, including education, employment and health and wellbeing. Utility costs, such as internet or telephone network connections, are not covered by NDIS funding provided to an individual. The NDIS is a government funded programme.

Services and skills

The NRS is an Australia-wide service to provide people who are deaf or who have a hearing and/or speech impairment with access to a standard telephone service, on terms and in circumstances that are comparable to the access other Australians have to a standard telephone service (as defined in Section 5 of the TCPSS Act).

The NRS is available 24 hours a day, seven days a week (with the current exception of the video relay service), and operates as a communication bridge for deaf, hearing-impaired and speech-impaired people when communicating with a wider community through voice telephony. A summary of the service options available is at Attachment B.

The number of successful inbound connections to the NRS[1] in 2014-15 was 497,338. The number of individual users of the service has been previously estimated to be in the range of 5,000 – 10,000.

More information about the NRS can be found at www.relayservice.gov.au.

Arrangements to deliver the NRS

Legislation relating to the NRS is outlined in Section 13 of Division 3 of the TCPSS Act.

There are two separate components to the NRS which are provided under contract to the Australian Government:

- a relay service, which relays calls between the deaf, hearing and/or speech-impaired communities and the broader community (currently provided by Australian Communication Exchange Limited (ACE)); and
- an outreach service that promotes community awareness and acceptance of the NRS, delivers training on how to use the service, operates a helpdesk that provides information to users and potential users of the NRS, and undertakes stakeholder engagement and research to inform continuous improvement of the service (currently provided by CFW Spice Pty Ltd trading as WestWood Spice)

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[1] Inbound connections are made by users of the relay service – either someone with a hearing and/or speech impairment or someone wishing to contact a person with such an impairment.

- Delivery of services under the current contracts commenced on 1 July 2013, with the contracts currently due to conclude on 30 June 2018.
- As the NRS relay service provider, ACE, is also a national operator of emergency call services under the *Telecommunications (Emergency Call Persons) Determination 1999* for emergency calls received through the 106 TTY text emergency service.

Funding arrangements for the NRS

The Telecommunications Industry Levy (TIL) is collected annually from eligible telecommunications carriers and is the sole source of funding currently available for provision of the NRS. The previous Government agreed with eligible carriers in 2012 to an annual funding allocation of $20 million (excluding GST) for the NRS to be drawn from the TIL. The tender process for the current agreements, conducted in 2012, expressed that the Commonwealth expected a total cost of up to $20 million (excluding GST) per annum to apply to the delivery of the NRS. Total cost of delivery of the NRS in 2014-15 financial year was $21,474,209.90 (including GST).

2.   Snapshot of a changing communications sector

In the last three decades, the communications sector has undergone significant and increasingly rapid changes in Australia, as evidenced by the graph below. The nature and speed of this change reflects similar developments in other parts of the world. These developments have had significant impact on the communications options available for Australians who are deaf or have a hearing and/or speech impairment.
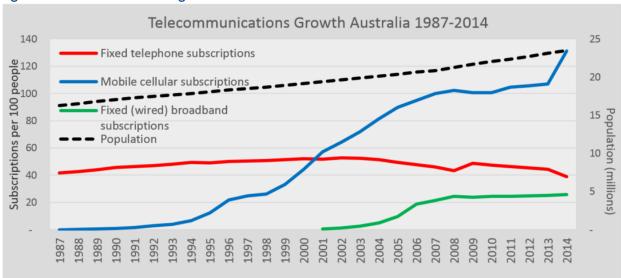
Figure 1: Telecommunications growth Australia 1987-2014

The method of communication available on the Public Switched Telephone Network (PSTN) is almost entirely voice-based. For people without the speech capacity to make voice telephone calls, a telephone typewriter (TTY) can make text-to-text calls over the PSTN but requires another TTY to be connected to receive the call. The original purpose of the NRS was to provide a bridge between TTY users and the broader community.

The decline in use of voice calls is an ongoing trend, reflected in increasing reliance on text-based communication options to establish connections between individuals, businesses and organisations. Access to the internet and communication options available through fixed broadband connections has also accelerated rapidly in the last decade. These developments have enabled the proliferation of text-based communication options, both through the NRS and in direct text-to-text communications.

Developments have also facilitated the rollout of video-to-video communications, with particular benefits for Auslan users. The ongoing rollout of the NBN will continue to have a positive effect on the availability and take-up of communication options through high-speed internet connectivity for all Australians.

Use of the NRS in the changing communications environment

While the disability equipment programs have seen limited changes, there have been significant developments in the nature and use of the NRS.

Delivery of the NRS in Australia commenced 20 years ago as a service for TTY users to communicate with the broader community. Additional service access options have since been added to the service, as text-based communication options have expanded more generally. All current service options, with the exception of TTY calls, can be accessed through mainstream communication devices.

In addition to the 106 text emergency service for TTY users, access to emergency services is now available to all users of the NRS by placing a request to call to Triple Zero. Such calls are given priority for attention within the relay service provider's call centre systems.

Australia is a world leader in the range of relay service options offered and service options have evolved with technological developments. A summary of the range of service access options delivered by the NRS in Australia compared to overseas relay services at **Attachment C.**

Use of the NRS is growing at a rate faster than was anticipated at the commencement of the current relay and outreach service contracts in 2013. The number of call minutes relayed by the NRS increased nearly 25 per cent in the first two years of the contracts, reflecting the successful introduction of new service options such as SMS relay, captioned relay and video relay.

The increase also reflects a slower-than-expected decline in the use of traditional service options, such as TTY. While TTY use has declined over the life of the current contracts, use of internet relay has remained generally consistent. The new service access options – SMS relay, video relay and captioned relay have been the source of growth in this period.

Table 1: Use of the NRS: 2012-13 – 2014-15

Financial year	Number of call minutes	Level of growth
2012–13	3,057,303	-
2013–14	3,408,760	11.50%
2014–15	3,814,757	11.90%

Australia's ageing population and increased life expectancies will also increase the numbers of people potentially requiring relay services due to acquired hearing loss. It is intended at this point that the NRS will continue to provide a safety net communications option for people who are deaf, hearing and/or speech-impaired. However, to ensure its ongoing sustainability, options need to be explored to increase the use of mainstream service options (where possible) by users and potential users of the service. Take-up of mainstream options should also contribute to improving the overall quality of life for people with disability.

Changes in mainstream equipment

Along with network and infrastructure developments, there have been significant developments in the types of equipment that enable access to communication services for Australians.

The price of computers and mobile devices has decreased facilitating increased uptake and use by Australians. The ACMA's 2014-15 communications report noted at May 2015, 13.41 million Australian adults (74 per cent) were estimated to be using a smartphone.[2] In the same period, the number of people accessing the internet via a tablet grew to 53 per cent at May 2015 to reach 9.7 million adult Australians.

At the same time, the functionality and accessibility of mainstream equipment has increased. This has created the opportunity for NRS users to take advantage of mainstream software and apps to contact family, friends and business. In some circumstances, these services have become direct substitutes for NRS service options.

Table 2: Potential mainstream service options

NRS Service	Potential mainstream service options
SMS relay	SMS, WhatsApp, Facebook Messenger, email, iMessage, Twitter DM
Internet relay, TTY type and read	Live chat, Facebook Messenger, email, Twitter DM
Video relay	Skype, FaceTime, Viber, Google Hangouts

The proliferation of new services presents opportunities for improved communications options for Australians with a disability. To fully explore these opportunities, the development of skills to utilise these options is crucial.

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[2] http://www.acma.gov.au/theACMA/Library/Corporate-library/Corporate-publications/communications-report-2014-15

3.   Potential options for reform

This paper proposes a number of reform options designed to improve communications for Australians with a disability and ensure the sustainability of the NRS as a safety net option over the life of the current contracts.

The options outlined in this paper should not be considered in isolation and it is likely that some options can be implemented in tandem to provide greater benefits. Options 1-4 focus on short-term options to support the sustainability of the NRS. Options 5-8 explore longer-term strategies to increase the use of mainstream technologies and services by people with a disability.

2015–16: Ensuring sustainability of the National Relay Service

Use of the NRS has continued to grow in 2015–16. Taking into account the current $20 million (excluding GST) funding allocation available to cover the costs of delivering the NRS, these circumstances require consideration of a number of options to ensure the sustainability of delivery of the service for the balance of this financial year and beyond. As noted previously, the initial term of current contract arrangements expires on 30 June 2018.

The timing of the introduction of some options may need to allow for adequate technical and transition processes to be developed and established.

Option 1: Increase the funding allocation available for the National Relay Service to sustain its delivery over the life of the current contracts

Use of the NRS has continued to increase in 2015–16, with a growth of more than 25 per cent in the number of call minutes relayed in the first six months of the 2015–16 financial year, when compared to the same period in 2014-15. Use of the captioned relay service option has accelerated rapidly since the removal of an announcement of the role and presence of the relay officer in these calls in December 2013. Use of most other service options remains consistent with levels of use established in the first two years of the current contracts. TTY use is continuing to decline but growth of use of the service in other areas is more than compensating for this factor.

To enable the ongoing provision of the NRS until the end of the current contractual terms in 2018, it is proposed that the funding allocation drawn from the TIL be increased to ensure access to the service, including access to calls to emergency services, continues to be provided to people who are deaf, hearing and/or speech-impaired. If the level of growth evident in the first six months of 2015–16 continues to the end of the financial year, an increase of 20-25 per cent in the previous funding allocation may be required to cover any shortfall from this financial year.

Issues for consideration

- Should a specific funding allocation from the TIL available for the delivery of the NRS be removed – i.e. funding from the TIL to be used on a fully cost recovery basis, reflecting the actual level of use of the NRS in each financial year?
- Should a specific funding allocation from the TIL available for the delivery of the NRS be increased by a set amount? If so, what amount?
- Should changes to the current $20 million allocation (excluding GST) available for the delivery provision of the NRS from the TIL be allocated for specific purposes? I.e. for delivery of specific service options.

Option 2: Introduce measures to manage demand for NRS services

With the continued increase in use of the NRS, other measures may need to be introduced to assist in managing demand for the service. One option could involve establishing a maximum number of call minutes available to users for a particular service access option, i.e. 'capping' a service option. The objective of capping would be to sustain delivery of the NRS.

Capping arrangements could require the relay service provider to manage delivery of any particular service access option to contain the number of call minutes relayed to a particular level. If demand to use a capped service access option was greater than allowed for within the cap, there may be an impact on quality of service delivery over the course of each day.

It should be noted that capping arrangements may only apply to some service options, to ensure that access to calls to emergency services would still be available to NRS users on a 24/7/365 basis through at least one widely used service option. Access to the 106 text emergency service would not be affected by any capping of call minutes or the introduction of any further limited hours of operation to ensure that statutory requirements in place for this designed emergency call number continue to be met.

The introduction of limited hours of operation for a broader range of service access options is another option to manage delivery of the NRS in the current funding environment. Video relay is currently delivered for a limited number of hours, focused on Monday-Friday business hours around Australia (7am-6pm AEST). All other service access options are currently available 24 hours per day, every day of the year.

As with any capping arrangements, reduced hours of operation may only apply to some service options, to ensure that access to calls to emergency services would still be available to NRS users on a 24/7/365 basis through at least one widely used service option. This would also ensure that the NRS continues to provide a comparable access to a standard telephone service, with 24/7/365 availability remaining in place for some, if not all, service access options.

Issues for consideration

- Should capping arrangements be put in place for one or more service access options delivered through the NRS?
- Which service access options could be capped (while maintaining access to calls to emergency services on a 24/7/365 basis) for users of the NRS?
- Should limited hours of operation be put in place for any other service access options delivered through the NRS, apart from the current arrangements in place for video relay?
- Which service access options could have limited hours of operation (while maintaining access to calls to emergency services on a 24/7/365 basis) for users of the NRS?
- Should caps be considered on a per-user basis as part of 'fair use' controls?

Option 3: Introduce more specific requirements to support access to the National Relay Service, including greater enforcement of fair use policies

There are currently only limited circumstances in which an individual user account is required to make calls through the NRS. Users must open accounts with the relay service provider (ACE) to make direct calls to overseas or premium numbers.

In the early years of delivery of the NRS under contract to the Australian Government, it was necessary for users to have an individual account with ACE and provide a PIN before making any sort of timed outbound call. Current individual account arrangements came into effect on 1 June 2002, with the subsequent introduction of specific terms and conditions of use of the service published on the NRS website (relayservice.gov.au). Voluntary registration requirements are also currently in place to allow some NRS users to receive calls through the service (internet relay and web browser version of captioned relay).

Historically, verification of the nature of a person's disability and their eligibility to use the NRS was tied to equipment. The processes involved in obtaining a TTY at a subsidised monthly cost from carrier DEPs, notably Telstra, have traditionally involved independent verification of the nature of the disability.

A wider range of the current service access options is available to users through a variety of mainstream communication devices and does not require any form of formal verification of the user meeting the terms and conditions of use of the NRS.

The breadth of service access options now available suggests that consideration should be given to re-establishing broader account or registration requirements to increase protection against non-genuine use of the service. These processes would also provide a mechanism to more accurately quantify the size of the NRS user base (previously estimated in the range of 5,000-10,000 users).

Fair use policies often apply to communication services, allowing for nominally unlimited individual use, while taking into account maintenance of quality of service for all users. The introduction of a fair use policy may assist in ensuring that all account holders with the NRS have access to a minimum of calls to be relayed on their behalf. As part of the more stringent enforcement of fair use policies, the 'follow-on' call option can also be reviewed. This option, currently offered in the provision of some NRS service access options, allows users to make consecutive outbound calls with a single inbound connection to the NRS. There may also be costs involved with implementing account and fair use arrangements which may divert funding available for the delivery of the service.

Issues for consideration

- Should account or compulsory registration requirements be expanded to cover access to all service options available through the NRS?
- Should the establishment of any account or registration process require appropriate independent confirmation of the disability which requires the account holder to use the service?
- Should the establishment of any account or registration process require account holders to appropriately self-declare the disability which requires them to use the service?
- Should appropriate fair use policies be introduced for account holders with the NRS?
- Should the current follow-on call options available for some types of inbound connections to the NRS be removed?

Option 4: Refocus the existing National Relay Service outreach programme

The NRS outreach programme currently has four agreed activity streams, published in the NRS plan for 2015–16:

- Promotion and awareness-raising;
- Training;
- Consumer liaison; and
- Stakeholder engagement.

These activities are supported by research and development projects, also undertaken by the outreach provider.

The consumer liaison function, which includes delivering the NRS helpdesk, is a primary point of contact for users and potential users of the NRS. Broader stakeholder engagement functions also provide points of contact for users and potential users of the service to raise issues.

Key outreach activities in relation to promotion, awareness-raising and training could be repositioned in the current funding environment. For example, outreach activities could focus on those with complex communication needs, who may have fewer mainstream communication options available to them. This approach could build on specific outreach strategies in place for 2015–16, such as growing the experience of people with complex communication needs about mobile NRS calls including through the NRS app.

Transitioning TTY users to more mainstream communication equipment could also continue to be a particular focus of the NRS outreach service in the coming years. Outreach services could also be used to support NRS users in taking up other mainstream communication services in appropriate circumstances, such as email or live chat.

Issues for consideration

- How could the NRS outreach programme be refocussed to assist in broadening awareness of service options and aiding the sustainability of the NRS?

Beyond 2015–16: Communications accessibility reform options

The movement from traditional models of providing specific services and equipment to instituting a mainstream market based approach (where possible) to supporting people with disability is occurring more broadly in Australia. This approach is a key factor in the establishment of the NDIS. Innovations in the communications market now allow for consideration of a similar transitional model from traditional 'specialised' options, such as the NRS and disability equipment programs, to other approaches that make best use of the opportunities provided by the development of new technologies and services.

Option 5: Review the range of services options and technologies available to sustain delivery of the NRS in the future

With NRS contracts due to end in mid-2018, it is timely to commence consideration of the delivery of the NRS in the medium to longer term. By 2018, there will be significant infrastructure improvements both in fixed line and mobile technologies. It is projected that there will more than 9 million homes and businesses ready for NBN service in 2018.[3]

Future consideration could be given to the types of equipment that can be used to access the NRS. Use of TTY service options has been declining at a steady rate for the last 18 months. Consideration must be given as to how long the NRS can support and offer call options using this legacy technology.

There is an argument that a future NRS should favour access to service options that also allow users to take advantage of mainstream communications options such as SMS, live chat and email. This would allow users a wider range of communication options to suit their situation, with the NRS as a true safety net service when mainstream options do not suit their needs. Incentives could be implemented for users to use mainstream technologies, including limiting the number of inbound connections generated by service options that use proprietary technologies.

The future composition of service options could also be considered with a focus on service options that have no (or limited) direct substitutes. For example, video relay users have more limited opportunities to take advantage of other types of NRS calls or mainstream communication options given a level of reliance on Auslan as their first language.

Issues for consideration

- What sort of transition process would be appropriate in phasing out legacy proprietary technologies such as the TTY access to the NRS?
- Are there options such as limiting inbound connections generated by specific technologies that could be introduced?
- What are the likely circumstances in which people may choose use the NRS over other communication options?
- How can reliance on the NRS as a communication option be reduced?
- Which are the service access options to favour when providing primary access to the NRS through non-proprietary mainstream technology options?

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[3] http://www.nbnco.com.au/corporate-information/media-centre/media-releases/nbn-network-to-reach-9-million-homes-by-2018.html

Option 6: Remove specific telecommunication regulations in place for disability equipment programs

Both Telstra and Optus have disability equipment programs for their customers, through which specialised equipment is offered under heavily-subsidised agreements in order to acquit their obligations under the *Disability Discrimination Act 1992* and, in the case of Telstra, the *Telecommunications (Equipment for the Disabled) Regulations 1998* (the regulations). The regulations were introduced at a time when people with disability were far more reliant on specialised communication device options, when compared to the suitability of mainstream communication devices and options available now in the changing communications environment. Such specialised device options often came at a significantly higher retail cost when compared to mainstream devices. The regulations support the provision of such specialised devices to users at a cost comparable to that incurred in the general community in obtaining devices to access standard telephone services.

However, there is an increasingly competitive market in Australia for mainstream communication devices. Smartphones are now widely available for less than $100, with a variety of older style standard mobile phones now reduced to less than $30. There is also an increasing range of mobile tablets available for less than $100. Such devices, and the applications (apps) which can be used with some of them, may address a range of communications accessibility issues for people with disability without necessarily needing specialist pieces of equipment.

With development of new devices and services, the need for a specific telecommunication regulation instrument to ensure communication equipment is provided at a comparable cost to mainstream options for people with disability may no longer be necessary. The removal of this regulation may assist in encouraging the development of more accessible features on mainstream communication devices.

Issues for consideration

- Should the Telecommunications (Equipment for the Disabled) Regulations 1998 be repealed?
- If the regulations were repealed, would an additional safety net, beyond compliance with requirements of the Disability Discrimination Act, need to be implemented?

Option 7: Encourage development of more affordable data-rich plans by retail service providers

The changing communications environment presents a number of opportunities for retail service providers to introduce market initiatives with commercial, as well as consumer, benefits. The increasing prevalence of over the top services and other communication options provides a range of mainstream options for current and potential NRS users.

Users with a disability may be less likely to make voice calls to other parties when using mobile or smartphones, depending on the nature of disability and their communication preferences. These individuals are more likely to be dependent on text-or video-based methods of communication. While the introduction of unlimited SMS messages on a monthly basis has become more widespread, affordable data access continues to be an issue.

There may be wider market benefits if plans giving users the choice of voice or data, or limited access to one or the other were available. Such plans could be provided on both a pre-paid and post-paid basis. A post-paid, data-rich plan could be bundled with mobile devices, including smartphones and tablets.

While some providers are starting to offer improved data plans tailored for Australians with a disability, increased offerings and promotion of these types of plans will improve outcomes for a greater number of users.

Issues for consideration

- Can more affordable data-rich plans be developed by restricting voice call allowances in such plans?
- Can such plans be provided on both a pre-paid and post-paid basis?
- Should plans of this nature be generally available to all communities?
- What level of support is necessary to encourage the take up of devices and plans of this nature by people with disability?
- What are options to consider in how to provide necessary support?

Option 8: Encourage initiatives to improve digital literacy and the availability of mainstream text- and video-based communication options

The NRS is now only one of a number of communications options for people who are deaf, hearing and/or speech-impaired. The use of direct text-based communication options by companies, organisations and government service providers to communicate with customers and communities is growing rapidly. Businesses and government agencies are increasingly encouraging customers to contact them by email, SMS, online contact forms and online chat. Development of apps for use predominantly on mobile devices has also increased the range of text-based communication options available.

The availability of these communication methods allows people who might have previously used the NRS, to contact companies and organisations directly. Expanding the range of communication options by organisations may also better meet service expectations in the broader community.

The Digital Transformation Office (DTO) is working actively on behalf of the Australian Government to improve online access and service delivery for all members of the Australian community.

Addressing issues such as digital literacy, communication equipment skills and confidence in using mainstream communication options for people with disability is of increasing importance. There is a wide range of digital literacy programmes available in different parts of Australia, often undertaken at a local level, with a variety of participants in mind (such as older Australians or Australians from a non-English-speaking background).

There may be benefit in implementing dedicated awareness raising programmes focused on promoting the benefits of mainstream technologies for people with disability. An industry-led programme, developed in association with relevant community groups with close knowledge of the needs of their members, could have wide-ranging benefits for both industry and the communities. These new programmes could also have closer linkages to the existing NRS outreach service.

Issues for consideration

- What skills and support are needed to encourage people to use mainstream technologies?
- Are there existing industry, government or community programmes which could be utilised?
- How can the broadening of the availability and promotion of mainstream text- and video-based communication options by businesses and service providers be encouraged?
- How can Australians with disability be supported to increase their use of direct text and video communication options?

Summary of options and questions

Options	Questions
Option 1: Increase the funding allocation available for the National Relay Service to sustain its delivery over the life of the current contracts	Should a specific funding allocation from the TIL available for the delivery of the NRS be removed – i.e. funding from the TIL to be used on a fully cost recovery basis, reflecting the actual level of use of the NRS in each financial year?
	Should a specific funding allocation from the TIL available for the delivery of the NRS be increased by a set amount? If so, what amount?
	Should changes to the current $20 million allocation (excluding GST) available for the delivery provision of the NRS from the TIL be allocated for specific purposes? I.e. for delivery of specific service options.
Option 2: Introduce measures to manage demand for NRS services	Should capping arrangements be put in place for one or more service access options delivered through the NRS?
	Which service access options could be capped (while maintaining access to calls to emergency services on a 24/7/365 basis) for users of the NRS?
	Should limited hours of operation be put in place for any other service access options delivered through the NRS, apart from the current arrangements in place for video relay?
	Which service access options could have limited hours of operation (while maintaining access to calls to emergency services on a 24/7/365 basis) for users of the NRS?
	Should caps be considered on a per-user basis as part of 'fair use' controls?
Option 3: Introduce more specific requirements to support access to the National Relay Service, including greater enforcement of fair use policies	Should account or compulsory registration requirements be expanded to cover access to all service options available through the NRS?
	Should the establishment of any account or registration process require appropriate independent confirmation of the disability which requires the account holder to use the service?
	Should the establishment of any account or registration process require account holders to appropriately self-declare the disability which requires them to use the service?
	Should appropriate fair use policies be introduced for account holders with the NRS?
	Should the current follow-on call options available for some types of inbound connections to the NRS be removed?

Options	Questions
Option 4: Refocus the existing National Relay Service outreach programme	How could the NRS outreach programme be refocussed to assist in broadening awareness of service options and aiding the sustainability of the NRS?
Option 5: Review the range of services options and technologies available to sustain delivery of the NRS in the future	What sort of transition process would be appropriate in phasing out legacy proprietary technologies such as the TTY access to the NRS?
	Are there options such as limiting inbound connections generated by specific technologies that could be introduced?
	What are the likely circumstances in which people may choose use the NRS over other communication options?
	How can reliance on the NRS as a communication option be reduced?
	Which are the service access options to favour when providing primary access to the NRS through non-proprietary mainstream technology options?
Option 6: Remove specific telecommunication regulations in place for disability equipment programs	Should the Telecommunications (Equipment for the Disabled) Regulations 1998 be repealed?
	If the regulations were repealed, would an additional safety net, beyond compliance with requirements of the Disability Discrimination Act, need to be implemented?
Option 7: Encourage development of more affordable data-rich plans by retail service providers	Can more affordable data-rich plans be developed by restricting voice call allowances in such plans?
	Can such plans be provided on both a pre-paid and post-paid basis?
	Should plans of this nature be generally available to all communities?
	What level of support is necessary to encourage the take up of devices and plans of this nature by people with disability?
	What are options to consider in how to provide necessary support?
Option 8: Encourage initiatives to improve digital literacy and the availability of mainstream text- and video-based communication options	What skills and support are needed to encourage people to use mainstream technologies?
	Are there existing industry, government or community programmes which could be utilised?

Options	Questions
	How can the broadening of the availability and promotion of mainstream text- and video-based communication options by businesses and service providers be encouraged?
	How can Australians with disability be supported to increase their use of direct text and video communication options?

Attachment A: Current disability equipment programs

Telstra

Type of Device	Model	Selected Features
Telephone	T1000S standard rental phone	Adjustable hearing volume control; adjustable ring volume; in-built hearing aid coupler.
Telephone	Big button/ multi-purpose phone	Large print and large button keypad; hands-free speaker; adjustable ring volume, pitch, hearing volume control and voice aid; in-built hearing aid coupler; flashing light for incoming calls; and additional port for external switch for dialling difficulties.
Telephone	Cordless phone	Handset range of up to 300 metres; boost button; hearing aid and T-coil compatible; extra loud ringer; ultra bright visual ring indicator; hands-free speaker.
Accessory	Extension ringer	Adjustable ring pitch and volume; flashing light to show incoming call.
Accessory	Cochlear implant telephone adaptor	Provides direct connection from speech processor to the telephone.
Accessory	Visual signal alert	Allows for a lamp to flash in sequence with incoming telephone ring
Teletypewriter (TTY)	Superprint 4425	Real-time sending and receipt of text messages over the telephone voice network; visual signal to alert incoming calls; turbo code communication.
Teletypewriter (TTY)	Uniphone 1150	Combines TTY and telephone features; hearing aid coupler; volume control; built-in flashing ring indicator; turbo code communication.
Teletypewriter (TTY)	Braille and large visual display TTYs	Braille display pad; large visual display unit.

Optus

Type of Device	Model	Selected Features
Telephone	Uniden DECT SSE25	Large display screen; large easy-to-read buttons; hearing aid compatible.
Teletypewriter (TTY)	Superprint 4425	Real-time sending and receipt of text messages over the telephone voice network; visual signal to alert incoming calls; turbo code communication.
Teletypewriter (TTY)	Uniphone 1150	Combines TTY and telephone features; hearing aid coupler; volume control; built-in flashing ring indicator; turbo code communication.

Attachment B: National Relay Service call options

Attachment C: Overseas relay service programmes

Service access options	Australia	New Zealand	USA	Canada	UK
TTY: Type and Read	✓	✓	✓	✓	✓
TTY: Speak and Read	✓	✓	✓	✓	✓
TTY: Type and Listen	✓	✓	✓	✓	✓
TTY: 106 text emergency service	✓				
TTY: Deaf-blind relay			✓		
Speak and Listen service	✓	✓	✓		
Video-assisted Speak and Listen service		✓	✓		
Internet relay	✓	✓	✓	✓	
Video relay	✓		✓	Under development	✓ (Trial)
Video interpreting service		✓			✓
SMS relay	✓				
Captioned relay	✓	✓	✓		
Relay conference captioning			✓		
Apps	NRS app (internet relay, Speak and Listen, Video relay, Captioned relay)	Mobile text relay	Mobile IP app, CapTel app		NGT Lite
Funding sources	Levy funded by eligible telecommunications carriers	Levy funded by eligible communication service providers; the Crown funds video interpreting services	Combination of telecommunications industry levy, State and Federal taxes	Costs absorbed by carriers	Carrier license condition