# Submission: Sustain the National Relay Service and improve communications accessibility for people with disability: 2016 and beyond

## This submission can be published on the World Wide Web

**Yes**

## Date of submission 6 May 2016

## Logo of organisation—if an organisation making this submission

## Name and contact details of person/organisation making submission

**Mrs Elizabeth Evans, Queensland. Australia**

## General comments

**It is my privilege to submit my thoughts about the future of the Australian National Relay Service.**

**I was a member of the NRSCCC (National Relay Service Customer Consultative Committee) for 6 years during 2007-2013, representing Stakeholders and Members of the National Deafness Forum of Australia Ltd - the National Peak Lobby group for all Australians who are Deaf, have a hearing or speech impairment, chronic ear disorders, deaf/blind members, parents of children of the same, and National Service Providers.**

**I was part of the delegation that successfully lobbied to the Australian Government for the provision of the captioned telephone service.**

**I am profoundly deaf and I wear 2 cochlea implants. I rely on using the National Relay Service; I am a regular user of the internet relay and have recently started to use the captioned relay facility of the NRS.**

## Response

### 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? No

### 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? No

### 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. Yes.

**More importantly, there are still potential NRS customers who are missing out with the help they need to facilitate their communication calls and the NRS should be able to help these people.**

**Eg, I note at one NRSCCC meeting, the Communication Rights Australia representative pleaded with the NRS provider (ACE) and the Government observers in attendance at that meeting, to help one of their clients who needed the design of a specialised TTY equipment. Both ACE and the Government Departments at the time said they were unable to do this and that the NDIS would help in this matter. Consequently, this client manages a home-based business and continues to struggle with communicating with his world around him.**

**In cases like these, it would be very beneficial for potential users of the NRS get the help they need (ie specialised equipment) relating to their individual and specific communication needs, and this will enable them to communicate better with the world around them and improve their quality of life.**

### Should capping arrangements be put in place for one or more service access options delivered through the NRS? No.

### 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? Capping service access options should not be applied.

**During a 24-hour period of the 2011 Brisbane floods, because the NRS service provider (ACE) is based in Brisbane and their staff had limited access to getting to work, all NRS services were shut-down and unavailable except for emergency calls. This did not help any of the NRS customer base who wanted to make contact with their friends and families concerning the effects of the flooding in many areas surrounding the Brisbane region and beyond. Roads were closed, transportation services were down, access to many airports were limited and it was a very dire situation for almost everyone in the region and beyond – eg trucks were affected with bringing and take supplies out of the region because of the flooding in the roads etc. The impact of the flooding affected many Australians at many levels**.

**All Australian callers/users of the NRS during this 24-hour period were unable to make any NRS calls and this proved to be very disruptive, eg all business and personal calls whether national or international, were all at stake.**

### It is not acceptable for people with disabilities to be cut out from communication services during times of State or National Emergencies.

### During times like these, the Australian public expects their telecommunication providers to have back-up services on standby, and made available when needed.

**In my own circumstance during this time, my mother-in-law was dying in New Zealand and I needed to make contact with my husband who was with her in New Zealand, but I was unable to because my NRS communication options were out of service. I needed to support my husband while he was in New Zealand but at the same time I was living alone at home during the storm I could not communicate to him about my concerns for our house (the roof was leaking) and my own personal safety, because the NRS was out.**

**These are just some examples as to why capping some/any services of the NRS should not be an option. Australians with communication disabilities should not be further disadvantaged during non-life/life threatening circumstances, if the NRS chooses to cap some services.**

### 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? No.

### 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? None.

### Should caps be considered on a per-user basis as part of ‘fair use’ controls? No.

### There would be some Australian NRS users who require the operation of the NRS to help with their home-run businesses.

### And remember, the NRS does not operate just for the benefit Australians who need help with facilitating their telecommunication calls; it is there to help others communicate with the NRS customer base.

### Should account or compulsory registration requirements be expanded to cover access to all service options available through the NRS?

### Perhaps, but the NRS customer base needs to be assured they will not be charged for using the NRS. On the other hand, this may help to identify the exact number of people who regularly use 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?

### Perhaps, some people with a communication disability (and/or multiple disabilities or complex communication disabilities) may object to this requirement.

### 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?

### Not if the account already stipulates the account holder is a person with a communication disability.

### Should appropriate fair use policies be introduced for account holders with the NRS? No.

### Should the current follow-on call options available for some types of inbound connections to the NRS be removed? No.

### The reason is that at times there is a waiting queue during peak-hour call times. A NRS customer may need to make other related calls and would not appreciate being put back to the beginning of the waiting queue when they currently have in-line connection within the NRS system. This procedure would prove to be time-wasteful and consuming for these NRS customers.

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

### Firstly, Outreach needs to focus on training, then awareness. Less time and expense should be allocated for promoting the NRS and engaging with stakeholders.

### Feedback and problems with the NRS should be directed to the NRS Provider, not the Outreach provider as these departments are not located on the same site. Outreach is based in Sydney while the Provider (ACE) is based in Brisbane and this is not a practical set-up. To save on expense, these separate NRS departments should be placed back together on the same location.

**During the captioned telephone pilot period, people I know experienced much difficulty during this trial, and in setting up this equipment together with their internet connection and existing telephone line. This highlighted the need for IT assistance to ensure the success of the trials, while this task often falls on the NRS Outreach personnel who have limited knowledge and skills in this area. Consequently everyone I know in my region has unfortunately returned their captioned telephone.**

**Additionally, when a NRS customer moves house or business premises, it can be very difficult to re-set their disability communications equipment without having expert technical help. Telstra only helps with line-based problems. Over-the-phone help becomes extremely complicated when the NRS customer is trying to rely complex terms and equipment via another person to their telephone/ISP. DEP (disability equipment program) customers should have access to complimentary set-up assistance in these circumstances.**

### What sort of transition process would be appropriate in phasing out legacy proprietary technologies such as the TTY access to the NRS?

### Many elderly signing Deaf people still rely on the TTY access. They should not be forced to use another type of service option. While the copper network systems are still in place, elderly signing Deaf NRS customers need the assurance they can continue to use their TTY to communicate with each other (ie TTY-to-TTY) and to others with the help of the NRS.

### Are there options such as limiting inbound connections generated by specific technologies that could be introduced? No.

### There could be cases where Australians with communication disabilities have their own home business.

### One-in-five Australians have a disability. They can be found doing under-paid work, contribute more unpaid labour in their workplace (ie as representatives, attending meetings relating to the Disability Sector but not related to their paid job), more likely to be found in ‘work for the dole’ schemes, more likely to use public transport, and can be the majority within the unemployment sector and those receiving the pension.

**Therefore, limiting inbound connections will not help improve their quality of life.**

### What are the likely circumstances in which people may choose use the NRS over other communication options?

### For Australians with communication disabilities, the NRS is the best proven facility to help them communicate with the world around them. Other service communication options ie Skype, MSN chat, FB chat, SMS, email etc are not always suitable in individual circumstances and this needs to be taken into account, eg other people still do not know how to reply to a SMS. Also, these other options (as mentioned) are not real-time communication methods.

### How can reliance on the NRS as a communication option be reduced? This is not possible.

### Australians with communication disabilities can and do use a number of other internet-based communication options like email, FB chat, MSN chat, Skype/type, SMS etc, but these are not viable/reliable options when a customer wants to make direct contact and communicate matters of importance.

### Government departments are always cutting down on their staff who facilitate telephone services and streamlining services ie only having one phone national phone number per Government Department. If Government departmental staff engage with members of the public using Skype, FB chat, MSN chat, I am not aware of this being done.

### Also, SMS was not designed to facilitate large amounts of data, it is not always a reliable service, nor is it suitable as a real-time communication method.

### Australian NRS users/customers are people who are already disadvantaged within the telecommunications industry and they should not be further penalised/disadvantaged if there are any planned changes to the NRS.

### The NRS provides the best practice method for Australians with communication disabilities to communicate with others, allowing for real-time service options.

### Which are the service access options to favour when providing primary access to the NRS through non-proprietary mainstream technology options? Home telephone, mobile phone, tablets, laptops.

### Should the Telecommunications (Equipment for the Disabled) Regulations 1998 be repealed?

### Perhaps, but please consider that while some mobile tablets and some smart phones may be cheap to purchase, the cost of using them with internet connection is not cheap for persons who are already disadvantaged with communication disabilities.

**This scheme could include hiring captioned telephones to NRS customers.**

### If the regulations were repealed, would an additional safety net, beyond compliance with requirements of the Disability Discrimination Act, need to be implemented? Yes.

### The Government needs to understand that Australians with communication disabilities would consider using other telecommunication service options if they could, but they cannot. These people heavily rely on internet service access, and having subsidised internet services would go a long way in helping these disadvantaged customers.

**Currently most (perhaps up to 95%) mobile phones are still not hearing-aid/cochlea implant compatible.**

**There are only a few landline telephone units that are hearing-aid/cochlea implant compatible.**

**The need for reliable fast-speed broadband access also applies to people who need to use video rely options.**

### Can more affordable data‑rich plans be developed by restricting voice call allowances in such plans? Yes.

### Can such plans be provided on both a pre-paid and post-paid basis? Yes.

### Should plans of this nature be generally available to all communities? No.

### Such plans should only be available to the communities who benefit from them the most.

### What level of support is necessary to encourage the take up of devices and plans of this nature by people with disability?

### A high level of support should be available.

### However Australians who cannot access normal options within the telecommunication industry, should continued to be financially assisted, because using the NRS can be time-consuming (ie waiting in a call queue) and costly (ie access to affordable and reliable internet connection)

### What are options to consider in how to provide necessary support?

**Trainers need to have acute understanding of disability issues and the access challenges that people with a disability face each day.**

**eg, it is unhelpful if a public speaker does not:**

* **know how to communicate with people with a hearing or speech disability**
* **provide an audio induction loop system for people with hearing-aids/cochlea implants to hear presentations better**
* **have awareness that many hearing-impaired people require live text captioning facility at public forums**
* **provide Auslan interpreters for the signing Deaf community**
* **provide tactile interpreters for the deaf/blind**
* **recognise that people with complex disabilities often need support persons with them, need transport assistance, access to and in public buildings, require allowances for other personal assistance (eg seeing-dogs) they may need more time in the mornings to prepare themselves for travel, have travel distances to consider, have dietary needs, have specific needs relating to using public furniture (table heights to access food or to eat at) etc.**

### What skills and support are needed to encourage people to use mainstream technologies?

**I think most people with communication disabilities are aware of mainstream technologies, but the equipment is not usually designed to assist with their communication needs.**

**Not all deaf people have the same degree of hearing loss, not Australians with a speech impairment have the same impairment, not all hearing-impaired people have the same type of hearing-impairment (sensorineural, congenital etc), and they may not have any/some chronic ear disorders like others do.**

**Additionally, some hearing-impaired people can hear on a telephone/mobile phone and can communicate well using Skype etc, but this doesn’t imply that other hearing-impaired Australians can do the same.**

**Currently 37% of permanent hearing loss is noise-induced. Most of this is preventable.**

**Australia has an aging population. By 2050, one-in-four persons are expected to have a hearing loss, while currently one-in-five people have a disability.**

**This highlights the importance for a specialised telecommunication relay service for these people who need it.**

### Are there existing industry, government or community programmes which could be utilised?

**There may be, but again trainers need acute awareness of how to best facilitate training sessions for people with communication disabilities. These highlights are mentioned above in Q25.**

### How can the broadening of the availability and promotion of mainstream text- and video‑based communication options by businesses and service providers be encouraged?

**Captions and side view Auslan interpreting in every type of media content (ie advertising, videos etc), and audio description for the blind is helpful. Promoting these methods of communication assistance could be done via television advertising. The Government should continue to push for greater and increased disability access within the media industry – film and internet/online sectors, and increase current captioning quotas.**

### How can Australians with disability be supported to increase their use of direct text and video communication options?

**Direct text and video communication options do not always ‘fill in the gaps’ when a NRS customer wants to make direct contact with their scope of connections.**

**Because the NRS acts as a third party in a conversation, it helps Australians to communicate (hear, speak, type or interpret on their behalf and relay conversations back and so forth) better to their outside world.**

**CONCLUSION: I think the Government needs to remember that the Australian National Relay Service is not an optional service for Australians with a communication disability, but it is the vital and necessary service that helps these people, by acting as a facilitator with their telecommunication access needs.**

**It is therefore important that this service continues and improves within itself.**