**RESPONSE TO CONSULTATION PAPER MARCH 2016**

#### 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.

As the NRS is an essential system it should be funded on a full cost recovery basis to enable it to meet its basic requirement. Past usage and predicted demographic movements can be a useful guide to future predicted usage to enable adequate appropriation of funds for its necessary ongoing operation.

It is also a dynamic mature but constantly evolving system geared to technological development and community usage of available technology that needs to be appropriately evaluated as a possible tool to guide future use. This monitoring and possible adaptation should also be funded to contain future on-going NRS operational costs but funding for this purpose should be managed by specific allocations for the purpose.

#### 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?

There should be no capping or curtailment of services. Rather, there should be education to steer users to more appropriate means of using the NRS acknowledging that some users will not be able to update or change the way they use the NRS. Then, based on usage profiles, some tweaking should occur to rationalise impacted services.

Where users use a particular service to communicate with businesses some consideration of reducing those services could be made to align with normal business hours.

Agree that emergency services not be reduced or limited in any way.

#### 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?

It is fair and reasonable that initiators of NRS communications be made to demonstrate they are bona fide users. How this is done should not be onerous and registration seems reasonable. The simpler the system the better but a small hurdle involving independent assessment could be useful. That could facilitate a grading system where those capable of using more economical means can be ‘lead’ to doing so.

#### 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?

The Outreach service is doing an excellent job and has improved its effectiveness under the current contract. That does not suggest it remain the ‘same’ into the future. With a concentration on ‘social media’ these days, in which the outreach function is visible, attracting a greater awareness of the NRS and its features using social media is an area to focus upon.

I have no specific recommendations to improve the service at this time as it seems to be up-to-date but would suggest a program aimed at keeping abreast of technology and how it might be used by the NRS be a feature of any outreach activity.

#### 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?

As I raised earlier, there should be no cutting off options to force the use of alternatives. For some users there will be no other means than the one they are using.

Society today seems to want to move forward faster than some at the periphery can move. And it will always be so. However, some within this category have the ability to move even though they don’t see that themselves. This is where focused education and incentivising might be beneficial.

#### 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?

No, the regulations should not be repealed. As outlined in Option 5, it is too early to make such a move. Whilst the number of folk so implicated is small, they deserve to be ‘protected’ from the on-rush of technology.

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?

Business will drive towards viable opportunities and lead developmental outcomes. Creating an awareness of such opportunities for NRS users by the NRS could be beneficial for those users and as such should be an ongoing feature of the outlook function in collaboration with the relay service provider.

From the user’s perspective and those able to do so, the pick-up of modern technology involving a ‘plan’ can be limiting due a number of constraints including limited income. How plans are structured is inevitably a decision made commercially but some input of the NRS environment could produce a better outcome for NRS users from suitable plans being provided. Voice over data decisions rest with the user preferences, needs and ability to fund. Likewise, pre-paid and post-paid are consumer decisions and should remain so.

#### 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?
* 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?

Certainly technology is moving forward at a rapid pace and more and more capability is being introduced. I have written earlier about the education function necessary to keep NRS users up with technological advancements. That there are a range of suitable programs available for a wide range of people, there is no reason why deaf and speech/hearing impaired people should not be included where that is possible. That would assist in creating community awareness and tolerance of people with a disability.

Unfortunately, as with other aspects of society, there will be some who cannot participate and require specialised education/training. The sensible way to approach this is on a needs basis with flexibly arranged programs to suit the individual(s) right down to one-on-one education/training. This requires much more specialised knowledge and skill than I am able to offer.