



OPTUS' RESPONSE TO COMMUNICATIONS ACCESSIBILITY: 2016 AND BEYOND CONSULTATION PAPER

6 May 2016

Ms Kelly Mudford
The Manager, Communications Accessibility
Department of Communications and the Arts
PO Box 13310, Law Courts
Melbourne VIC 8010

Via email: accessibility@communications.gov.au

Dear Ms Mudford,

Optus welcomes the opportunity to comment on the consideration of accessibility issues relating to telecommunications services and the sustainability of the National Relay Service (NRS) as outlined in the Department of Communications and the Arts, April 2016 'Communications Accessibility: 2016 and beyond' Consultation Paper (the Paper).

Optus has had an ongoing relationship with the National Relay Service (NRS) for a number of years, including taking part in their Hearing Awareness Week to promote awareness for its staff and customers. As the Paper states, Optus maintains a disability equipment program which includes teletypewriter (TTY) handsets.

Optus supports the combined submission made in response to the Paper by the Australian Mobile Telecommunications Association and Communications Alliance; and reiterates the points made in that submission. In addition, Optus offers the following comments.

The NRS should continue to remain an important safety net service for users who would otherwise have difficulty accessing communications through other means in order to participate fully in society. Insufficient detail is known about which individuals must solely rely on the current suite of service options the NRS provides. Therefore further research is needed to understand the volume of users in this position and the barriers preventing them access, for example more research is needed to understand why NRS users seek to use SMS and video relay rather than mainstream options. Optus encourages the Department to better identify users who cannot access mainstream communications currently available in the market and shape any policy decisions on the NRS around supporting these users.

On the flip side, where it is known that technology is already directly available to all, such as SMS to mobile phones, the NRS could avoid providing an additional service option without detriment to any users.

Optus notes the Paper asks for feedback on ways to encourage government agencies and businesses to broaden the range of text based communication options available for their

customers. This should be actively encouraged where responsibility falls within the remit of the DTO and other government agencies.

Optus offers a wide variety of contact options for its customers. These include:

- our traditional call centres;
- web chat;
- online support and information pages, including our community forum and blog, Yes Crowd;
- the My Optus mobile app;
- social media sites such as Facebook and Twitter; and
- Optus' retail stores.

Optus also provides access for TTY handsets to two specific contact numbers to provide assistance for customers who use TTYs. The volume of calls to these support numbers has declined significantly. In Optus' experience it has been an ongoing challenge to balance staff resourcing and training for these services to provide a similar experience that is available for all customers through its other contact methods.

Therefore Optus supports the availability of the NRS hours of operation in its current form to allow Optus customers to access the subject matter experts needed to address their enquiries. We understand this is likely to drive more calls via the NRS.

For businesses who continue to provide specific TTY contact numbers there will be an ongoing tension between providing ongoing and adequate training and resources to cater for increasingly infrequent contact via TTY with the ability to provide customers with assistance from mainstream call centres via the NRS. It is therefore important for the NRS to continue this important work of providing communications access to TTY users in particular and Optus does not want to see a reduction in service levels for that group.

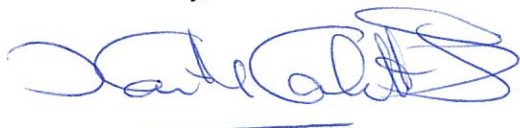
Should future policy determine to phase out TTY handsets, their replacement should be supported by specifically targeted federal Government funding arrangements rather than an extension of NRS funding. There is a precedent for such a device replacement scheme in the federal subsidisation of digital set top boxes for analog televisions. The principle of consumer benefit would also apply to TTY users; and the customer base and therefore cost would be significantly smaller.

Optus will continue to offer its disability equipment program while TTY handsets remain available. However, if the supply of TTY handsets cease, Optus is likely to look to mainstream text services for the support of communications from customers who cannot hear or cannot speak.

Optus supports the option of the NRS' outreach programs providing greater support and education to users on how to access newer technologies that allow direct communication, including text and video options. It would be of benefit to users for the program to recommend this type of direct text contact for people who are deaf, are hearing or speech impaired, instead of pushing a text to voice call via the NRS.

Optus looks forward to further opportunity to discuss and consider proposed changes to the NRS' scope.

Yours sincerely,



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