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### Telstra

**Submission to Department of Communications and the Arts**

**Communications accessibility: 2016 and beyond**

**6 May 2016**

# Introduction

Telstra is committed to providing equitable communications services to people living with disabilities and to ensuring access to standard telephone services (STS) under the universal service obligation (USO).

Telstra’s Disability Equipment Program (DEP) interacts with the National Relay Service (NRS) and has been in place since 1987. Telstra also has a registered Disability Action Plan (our sixth DAP since 1996), which will be replaced later this year by the company’s first Accessibility and Inclusion Action Plan.

Telstra is the largest contributor in dollar terms to the funding of the NRS via the Telecommunications Industry Levy.

Advances in information and communications technologies and the shift to digital connectivity have created significant potential to positively transform the lives of people with disability, improving not just their access to telecommunications, but greatly increasing their opportunities for social and economic participation.

Telstra supports the submission made by the Australian Mobile Telecommunications Association (AMTA) and the Communications Alliance on behalf of the telecommunications industry. What follows are additional observations specific to Telstra’s experience as the primary universal service provider and the provider of the largest disability equipment program in the Australian market.

# Background

As the primary universal service provider, Telstra must ensure that all people in Australia have reasonable access to STS and payphones.

In conjunction with providing a STS, Telstra supplies customers with a basic telephone handset upon request. Customers are given the option of hiring or purchasing a basic telephone handset.  Customers with a disability are provided with the telephone equipment set out in Telstra's Disability Equipment Program, which was established in 1987.

The National Relay Service (NRS) provides people who are deaf, or who have a hearing and/or speech impairment, with access to a [standard telephone service](http://www.in.telstra.com.au/ism/regulatory/standardtelephoneservice.asp) on terms, and in circumstances, comparable to the STS.

The NRS operates as a relay service in Australian English between voice and non-voice users of the STS. Telstra facilitates access to the STS through the relay of voice, via telephone typewriter (TTY) equipment or a modem attached to a standard fixed line service. The NRS also provides Internet (IP) Relay, SMS Relay, Video Relay, Captioned Relay and TTY Relay Services. The NRS also has a mobile phone application through which these services can be accessed.

As the primary universal service provider, Telstra supplies the following equipment, specified in the Telecommunications (Equipment for the Disabled) Regulations 1998 (the Regulations), which allows a person with a disability to access the NRS:

1. Equipment that facilitates text to text communication through the telephone network, for example, a telephone typewriter (TTY);
2. Equipment that facilitates data transmission over the telecommunications network, for example, a modem; and
3. Equipment that facilitates data transmission over the telecommunications network and its transfer into Braille, for example, a telebraille.

# Executive Summary

Telstra makes the following observations:

* The NRS must be retained as safety-net;
* There is a decreasing reliance on Telstra’s DEP as customers increasingly choose to shift away from fixed-line telephone services to mobile and internet-based communications[[1]](#footnote-1);
* Analysis as to where the greatest pressure on NRS services is occurring should be undertaken by the NRS and the Department;
* A coordinated approach is needed to support customers who still rely on TTY and other fixed-line services via the NRS to move to new communications technologies;
* Telstra supports the introduction of a pricing signal to large recipients (i.e. B-party) of NRS internet-relay calls to encourage provision of direct mobile and online communications options;
* The supply of services to Australians with disabilities is likely to be reviewed within the context of the PC’s Universal Service Obligation (USO) review.

# Declining reliance on Telstra’s DEP and migration of stalwart fixed-line / TTY customers

Telstra recognises that the traditional consumer segment for NRS services is increasingly choosing to use mainstream digital communications technologies to meet accessibility needs.

A decreased reliance on access to the standard fixed-line telephone service via special access equipment is evident. This is the result of a general shift away from fixed-line telephone use towards mobile and internet communication in the general community, combined with increased accessibility of those mobile and internet-based devices through the application of universal design principles.

This shift is seeing a significant decline in the reliance of Telstra customers on the DEP, with a particular drop in new users, and a concurrent decline in the traditional services that rely on the NRS, such as the TTY.

Telstra’s DEP has provided less than 2,500 TTYs into the Australian market since inception in 1997, and is currently seeing an attrition rate of around 100 units per annum being returned under the program. While figures are not certain, we estimate there are approximately an additional 10,000 TTY units privately owned in Australia, but it is unclear how many of these units remain in use.

NRS statistics show that calls via TTY via the NRS are significantly less than captioned relay (handset) and internet relay calls[[2]](#footnote-2).

At the same time, Telstra recognises that there will be a small but significant number of TTY users who will find it difficult or impossible to transfer to mobile or online communications options without support. Many of these users will also be older Australians, who are the most resistant to making the shift to mobile and online communications technologies[[3]](#footnote-3).

Unless there is a change in government policy, Telstra will continue to support these customers under the USO and work with the government to identify potential migration paths for these customers onto suitable alternatives. If the government was to propose a change to arrangements that would extend the USO beyond the current STS requirements, the resultant disability equipment requirements could be funded either through an increase in USO funding, or via a separate government funded mechanism (e.g. NDIS).

# Understanding the pressures on the NRS and potential introduction of a pricing signal to encourage provision of direct mobile and online contact options

Current NRS statistics demonstrate a significant user base for internet relay services[[4]](#footnote-4), which would appear to be one source of the current pressure on NRS services. It is important that financial supporters of the NRS gain an understanding of where the greatest proportion of these call volumes are located in order to determine if there is a need for incentives for government agencies and businesses to implement direct online communication services to obviate the need for reliance on the NRS. Therefore, Telstra supports the suggestion that the Department and the NRS provide an analysis of usage statistics to determine where the greatest number of internet, captioned (handset) and video relay calls are being placed.

Should this analysis support the current assumption that this usage is in large part between individuals and businesses or government agencies, Telstra supports the introduction of a pricing signal to large recipients of NRS internet-relay calls to encourage provision of direct mobile and online communications options as an additional or replacement NRS funding mechanism, as suggested in the AMTACA submission under “Option 3 – Fair Use Policy”.

# Review of access regulations under the Universal Service Obligation (USO)

Telstra notes that the Productivity Commission has recently commenced a 12-month inquiry into the future direction of a universal service obligation (USO). The Terms of Reference direct the Commission to include in its consideration “whether particular sections of the Australian community have differing needs to which additional Government intervention should be directed”. We anticipate that the needs of customers with a disability will be considered within this context.

# Conclusion

Telstra submits that Government should work with the NRS and industry to support a shift away from reliance on TTYs specifically, and the NRS more generally, to the adoption of mainstream communications technologies, via the methods outlined above and in the submission from the AMTACA.

As the primary universal service provider and the operator of the largest Disability Equipment Program, Telstra strongly supports retaining the NRS in its current form to provide an essential safety net for people who are not able to easily transfer to mainstream communications.

1. <http://www.acma.gov.au/theACMA/engage-blogs/engage-blogs/Research-snapshots/Mobile-only-Australians-top-over-3-million> [↑](#footnote-ref-1)
2. # National Relay Service Quarterly Performance Report, Quarter 2, 2015–2016, PP 9-10.

   [↑](#footnote-ref-2)
3. <http://www.acma.gov.au/theACMA/engage-blogs/engage-blogs/Research-snapshots/Older-Australians-resist-cutting-the-cord> [↑](#footnote-ref-3)
4. # National Relay Service Quarterly Performance Report, Quarter 2, 2015–2016, PP 9-10.

   [↑](#footnote-ref-4)