



Women
With
Disabilities
Australia
(WWDA)

Women With Disabilities Australia (WWDA)

**Submission to the Feasibility Study into an
Independent Disability Equipment Program**

April 2009



Winner, National Human Rights Award 2001
Winner, National Violence Prevention Award 1999
Winner, Tasmanian Women's Safety Award 2008
Certificate of Merit, Australian Crime & Violence Prevention Awards 2008
Nominee, French Republic's Human Rights Prize 2003
Nominee, UN Millennium Peace Prize for Women 2000

Women With Disabilities Australia (WWDA)
PO Box 605, Rosny Park 7018 TASMANIA, AUSTRALIA
Ph: +61 3 62448288 Fax: +61 3 62448255
ABN: 23 627 650 121
Email: wwda@wwda.org.au
Web: www.wwda.org.au

Written by Sue Salthouse for Women With Disabilities Australia (WWDA), Sue Salthouse is the Vice President of WWDA and the Leader of the WWDA Telecommunications Group.

© Women With Disabilities Australia (WWDA) **April 2009**

This work is copyright. Apart from any use as permitted under the Copyright Act 1968, no part may be reproduced without written permission from Women With Disabilities Australia (WWDA). All possible care has been taken in the preparation of the information contained in this document. WWDA disclaims any liability for the accuracy and sufficiency of the information and under no circumstances shall be liable in negligence or otherwise in or arising out of the preparation or supply of any of the information aforesaid.

“It is vital that we change attitudes and approaches to persons with disabilities, ensuring that all fundamental rights and freedoms are honoured, including the right to fully participate in the information society, and bring forth input, ideas and effort from the disability community.”

— Ban Ki-Moon, UN Secretary-General,
(message to the World Telecommunication & Information Society Day 2008)

About Women With Disabilities Australia (WWDA)

Women With Disabilities Australia (WWDA) is the peak organisation for women with all types of disabilities in Australia. WWDA is run by women with disabilities, for women with disabilities. It is the only organisation of its kind in Australia and one of only a very small number internationally in that it operates as a national disability organisation; a national women's organisation; and a national human rights organisation. WWDA represents more than 2 million disabled women in Australia. WWDA is inclusive and does not discriminate against any disability. The aim of WWDA is to be a national voice for the needs and rights of women with disabilities and a national force to improve the lives and life chances of women with disabilities. WWDA addresses disability within a social model, which identifies the barriers and restrictions facing women with disabilities as the focus for reform. More information about WWDA can be found at the organisation's extensive website at: www.wwda.org.au

Introduction

0.1 The feasibility study – Rationale for an Australian Independent Disability Equipment Program (IDEP)

(i) International

The message of Ban Ki-Moon, UN Secretary-General, for World Telecommunication and Information Society Day held on 17 May 2008 puts an international and rights context on the need to ensure persons with disabilities have equitable access to telecommunications assistive equipment in order for them to fully participate in the information society.

At an international level, this message is further articulated in the UN Convention on the Rights of Persons with Disabilities (CRPD). Its purpose, as outlined in Article 1 (Purpose), is to "*promote, protect and ensure the full and equal enjoyment of all human rights and fundamental freedoms by all persons with disabilities...*".

In order to do this, the CRPD further specifies that persons with disabilities must have rightful access (see Article 9 – Accessibility) "*....to information and communications, including information and communications technologies and systems...*", and that this access shall include electronic services, emergency services [Article 9. part 1 (b)], and the Internet [Article 9. part 2 (g)].

Article 20 (Personal Mobility) of the CRPD recognises the importance of assistive technologies to enhancing the personal mobility capacity of persons with disabilities, and the necessity to make such devices available at affordable cost. Wheelchairs are not the only examples of a personal mobility device. In 2009, it is also necessary to put mobile phones in this category (Mobile phones with operating system capacity to use both speech readout and GPS software, enable a person who is blind or vision impaired to have much greater and safer freedom of movement than has previously been possible.)

The CRPD came into force in Australia on 18th August 2008. The Feasibility Study into the IDEP needs to take these international obligations into consideration.

(ii) National

At a national level, the Australian Government is committed to action. The Australian Labor Party (ALP) Platform for Action 2007¹ contains a section on "Equitable Access to Modern Communication Services" in which Paragraph 115 states that:

Labor regards telecommunications services as essential services that should be accessible and affordable for all Australians. Labor believes that access to fundamental telecommunications services should be provided through a universal service subsidy that adequately compensates for the costs of universal services, funded by the industry in accordance with market share.

WWDA believe that this commitment for access to telecommunications services cannot be met unless equitable access to assistive equipment is also provided. The way forward through a 'universal service subsidy' is signalled in this document.

The Platform for Action further outlines in Paragraph 116 that:

Labor is committed to ensuring that all Australians will be able to enjoy access to affordable high-speed broadband telecommunications service.

WWDA believes that this will not be possible unless an equity scheme of some sort is put in place to support persons with disabilities who need assistive equipment to access the Internet.

(iii) Legal

The Disability Discrimination Act 1992 (DDA) makes disability discrimination unlawful and aims to promote equal opportunity and access for persons with disabilities. Discrimination is any practice that makes distinctions between individuals or groups that disadvantage some and advantage others. Anti-discrimination law adopts a formulation of discrimination as being, not only different treatment, but also less favourable treatment, i.e. indicated by the comparison between two people where one person is *treated less favourably* than the other. Lack of equitable access to communications can certainly be seen as in breach of anti-discrimination legislation.

Over 90% of Australians use mobile phone services. Denying individuals with disabilities their use because of barriers of access to assistive equipment constitutes discrimination under the DDA. Importantly, obligations under the DDA include equipment provided in conjunction with mobile services as well as fixed line services.

(iv) Demographic

The Australian Institute of Health and Welfare (AIHW) report, *Life expectancy and disability in Australia 1988-2003*², predicts that, on average, men in Australia as they age can expect to live nearly 19 years of their lives with a disability (and more than 5 years with a "severe or profound" disability) while women, living longer, can expect to experience nearly 21 years of disability and over 8 years of severe or profound disability. Lack of access to assistive equipment will become a greater problem in the future, and steps need to be taken now to address the growing demand for equitable access to communications.

¹ ALP National Platform and Constitution 2007, <http://www.alp.org.au/platform/index.php>

² <http://www.aihw.gov.au/publications/dis/leda88-03/leda88-03.pdf>

Chapter 1: The Australian market

1.1 Current arrangements in Australia

In responding to a WWDA request for feedback about the possibility of an IDEP, persons with disabilities indicated wholehearted support for such a program.

Question 1: Should specialised equipment that enables people with disabilities to access mobile and computer technologies be included on an independent disability equipment program? Please give reasons to support your answer.

The rationale for expanding a DEP to include mobile and computer technologies is outlined above. This is an equity matter, and Australia's obligations under the CRPD, the ALP Platform for Action and the DDA specify that inequities in access to communications must be addressed.

The justification for this being an equity matter rest with statistical information about what is the 'norm' of communications access for the non-disabled population. The penetration of mobile phones in the Australian community is high. Fifteen percent of respondents to a 2009 ACMA survey³ on Internet use and confidence reported that they no longer had any fixed line service. The actual number of mobile phone services has exceeded the size of the population for more than 12 months⁴.

In Australia in 2007⁵ there were 11.3 million users of the internet. This is distributed over all age groups ranging from 90% of those aged 18 to 44 and 44% of those over 70, with internet use being strongly linked to level of education. The International Telecommunications Union puts internet use in Australia at an even higher level of 74.3% of the Australian population, and noted that broadband subscribers outnumbered dial-up subscribers 2:1⁶.

WWDA believes that an IDEP is an essential service for persons with disabilities. The current DEP, run by Telstra, has been an asset for Telstra customers with disabilities needing assistive equipment to access the fixed line service. WWDA believes that Telstra has striven to meet the needs of its customers with disabilities, and the DEP has been excellently conducted, has met the needs of many consumers with disabilities. However, because of the rapid changes in communications, it is now limited in scope, and discriminatory in a competitive environment. The call from the disability sector for an IDEP arises from the need to expand the scope of the program to include mobile and computer technologies to enable equitable uptake of new communication methods by all. Such expansion cannot take place under current conditions, and will require instigation of a Universal Service Subsidy scheme applied to all carriers, carriage service providers, content providers, internet service providers, etc.

³ Australian Communications & Media Authority (2009) *Australia in the Digital Economy, Report 1: Trust and Confidence*, Commonwealth of Australia 2009

⁴ International Telecommunications Union (April 2008) ICT statistics newslog Accessed online 12 April 2009 at: <http://www.itu.int/ITU-D/ict/newslog/Number+Of+Mobile+Phones+Now+Exceeds+Australias+Population.aspx>

⁵ ABS, 2008, *Household use of information technology*, Australia, 2006 to 2007, 8146.0, <http://www.abs.gov.au/Ausstats/abs@.nsf/mf/8146.0>, accessed November 2008.

⁶ International Telecommunications Union (December 2007) accessed online 12 April 2009 at <http://www.internetworldstats.com/sp/au.htm>

Question 2: *Is subsidised access to specialised equipment an equality issue? Please give reasons to support your answer*

An IDEP needs to address the equity issues which do exist for persons with disabilities gaining access to assistive equipment and to costly off-the-shelf equipment.

The Discussion Paper provided by the Department of Broadband, Communications and the Digital Economy (DBCDE) notes that the costs of medication and glasses are borne by individuals, both with and without disabilities, in the community. However, it may be argued that persons with disabilities have disproportionately high medical costs because of their disabilities, and this contributes to them not having the money available to purchase necessary assistive equipment.

The rationale for establishing an IDEP is that it is an equity issue when the penetration of mobile phones and Internet in our community is so high. In come inequities mean that a disproportionate number of persons with disabilities are represented in that percentage of the population who do not own a mobile phone and that proportion which does not have the Internet. It also needs to be considered that persons with disabilities who do own mobile phones and own/use the internet, may not be using these communication tools to best advantage because they do not have access to assistive equipment.

Currently, people who are blind or vision impaired must meet the added cost of accessible software to access mobile phone and computers.

CASE STUDY #1

A mobile phone which uses the Symbian operating system (OS) necessary to support screen reader software, such as 'Talks', costs considerably more than mobile phones which can be used by the sighted population. For example the Nokia N82 phone costs approximately \$700. In addition the Nuance'Talks'/MobileSpeak or other mobile screen reader software costs in the region of \$400. Access to this combination of equipment enables a person who is blind or vision impaired to use a mobile phone in a manner equivalent to a sighted person. In comparison a mid-range multi-function 3G mobile phone for a sighted person can be purchased for as low as \$130⁷. Thus the individual who is blind or vision impaired is at a \$970 disadvantage in getting equivalent access to a mobile phone.

Wayfinder Access software which enables full use of the GPS capability of a mobile phone as in Case Study #1 is a free software program but requires the system combination outlined above. Wayfinder Access enables a greater degree of navigation confidence than has previously been possible, and will enhance the employment capabilities of people who are blind, vision impaired or have communication impairment.

In contrast the Kreader Mobile⁸ software from KNFB Reading Technology Inc. uses a specific system which converts a mobile phone such as the Nokia N82 into a scanner,

⁷ Internet search, 12 April 2009 (http://www.pcworld.idg.com.au/section/mobile_phones/3g_mobile_phones)

⁸ <http://www.knfbreader.com/products-kreader-mobile.php>

screen and text reader, and is a liberating device for those who are blind, or have vision impairment, speech impairment, or dyslexia. Such a set-up enhances independence and mobility but at a cost about \$(AUS)3000.

CASE STUDY #2

“William” is a person who is blind. He realizes that the cost of some equipment is extremely high, but would like the freedom of movement and independence which he could achieve if he was able to use a ‘Kreader Mobile’ system. He already has good Internet skills and uses a screen reader program which enabled him to read texts for his tertiary studies. However, he has yet gained employment and has not been able to afford to buy a mobile phone with screen reader software, or speech readout, so has put off buying any mobile phone for several years.

He has trialled the “Kreader Mobile” and knows the specifications on which it needs to operate. “I would like to purchase a Nokia N82 mobile phone which enables the Kreader Mobile to work on the Symbian S60, 3rd Ed, FP1 Operating System”. This combination uses a mobile phone with a screen reader program which enables its operation by someone who is blind. In addition the phone’s camera can be used as a scanning device by which a photograph of a page, address label or other item can be taken and the scanned contents then read out to the user. The portability of the device means that the user can access meeting notes, etc. on the spot. Its application is suitable for people who are blind, vision impaired, or dyslexic, and has particular suitability for those working in the field of translation from text to Braille, or in office situations.

However the current cost of this setup is about \$(AUS) 3000. William would like an IDEP set-up which has a no-interest loan pool from which individuals could borrow with repayments made over a finite term of, for example, 3 years.

1.2 The international experience

Question 3: Are there any international disability equipment programs that could provide a model for a future Australian program?

The fact that there is a number of overseas models of assistive equipment supply indicates that other governments have taken steps to address the question of inequity of access. Of the comparable economies of Canada, New Zealand (NZ), Sweden, United Kingdom (UK) and the USA, only NZ and Sweden have ratified the CRPD. It could be that these two nations are currently investigating more equitable ways of meeting their obligations under the Convention.

The existence of overseas DEPs means that Australia can ‘cherry pick’ ideas from these models. However, the justification for an IDEP is independent of overseas practices as was outlined in the Introduction of this submission. The IDEP which Australia develops can be an example of best practice, subsequently followed by other

nations. This leadership can be noted in the Australian Government first report to the UN CRPD monitoring committee of which Australian representative Ron McCallum is Rapporteur to the General Assembly.

Question 4: Are there any examples where an international equipment program has provided mobile phones and computer equipment to people with disabilities via a national scheme?

The need for DEPs to supply mobile phones and computer equipment is increasing as their common usage by the non-disabled population increases. The international obligation to enable equitable access for persons with disabilities is increasing as the affect of the CRPD on ratifying nations increases. Australia can demonstrate leadership in this, and thereby encourage the large markets of India and China (both of which are ratifying nations) and manufacturers of equipment, to maximise accessibility for persons with disabilities.

The recommendation to expand the IDEP to include mobile phones was given by Jolley (2003)⁹, and the limitations of DEPs restricted to the Standard Telephone Service were outlined by Allen Consulting (2006)¹⁰, although no recommendation to expand the DEP to include mobile phones and the Internet was made in this latter report.

In 2007, the Asia-Pacific Telecommunity Standardization Program (ASTAP) undertook a Survey on Accessibility¹¹ which included questions about the penetration of mobile phones and the Internet in the region. This was done in an endeavour to estimate the requirements of persons with disabilities.

In fact there are some examples of jurisdictions which do supply computer equipment, whilst supply of mobile phones is more rare. The Vermont Telecommunications Equipment Distribution Program (VTEDP)¹² supplies the following:

- TTY or BrailleTTY (the cost of a BrailleTTY is in the region of \$(AUS)8000);
- CapTel phone (an amplified telephone with written captions of the conversation not yet available in Australia);
- Amplified phone (applicants can choose the type: corded, cordless, large buttons, caller ID, etc.);
- Flashing light and/or loud ringer device;
- Voice carry-over "VCO" telephone (a telephone that allows deaf people to read incoming messages from a relay service, but lets them use their voice to respond.);
- Hearing carry-over "HCO" telephone (this is the same item as a VCO phone, and is used by people who can hear but cannot speak (you type on a TTY keyboard and relay operators translate it to voice for you, and you hear the caller through speakers), an electrolarynx telephone, or a **computer** with speech creation software;
- **Personal computer** if bought with text telephone software;
- Text telephone software for a computer; and
- Other adaptive equipment you may need to use the phone.

⁹ Jolley, B (2003) *When the Tide Comes in :Towards Accessible Telecommunications for People with disabilities in Australia* HREOC 2003 accessed online (12.4.09) at:

http://www.hreoc.gov.au/disability_rights/communications/exec.htm

¹⁰ Allen Consulting Group (2006) *Review of the provision to telecommunications equipment to consumers with disabilities*, Report to DCITA 2006

¹¹ www.aptsec.org/Program/ASTAP/WG/AU/Survey-on-Accessibility.doc

¹² <http://www.vtedp.org/>

The VTEDP provides free telephone systems adapted to the specific needs of eligible users (including people who are Deaf, hearing impaired, speech impaired, visually impaired, or have a physical disability that makes it hard for them to use a telephone). The program is income tested, with those not qualifying put on a waiting list for end-of-financial-year assistance if funds permit. The VDEP conducts an outreach service for persons with disabilities who are unsure what assistive equipment they need. Personal computers with assistive software are included. Mobile phones are not specifically listed although 'other adaptive' equipment may cover the eventuality that they be included.

A second example is the Nebraska Specialised Telecommunications Equipment Program¹³ which offers monetary assistance up to \$(US) 1000 (excluding set-up costs) for purchase of specialised equipment to people who are blind or have vision impairment, those who are Deaf or have hearing impairment, and people with speech impairment. The equipment includes mobile phones and computers. However, the program is somewhat restrictive in allowing only one application per household per 5-year period (therefore not suited to group households of persons with disabilities), and uses a restricted number of approved vendors. Whilst this program demonstrates that such equipment is essential for some persons with disabilities, the program addresses the problem in a discriminatory way.

A number of universities (e.g. National University of Ireland Maynooth Access Program¹⁴) have disability equipment loan schemes which serve students for the duration of their studies. Loans of laptops with assistive software and hardware are common. Such schemes are already in existence through individual educational institutions.

On a state by state basis, mobile phone and computer equipment may be supplied by Disability People's Organisations (DPOs) such as the Association for the Blind of WA (ABWA)¹⁵ which maintains, upgrades and repairs assistive technology for use in the home and the workplace. The equipment in the ABWA program includes:

- Speech synthesisers
- Text to speech scanners
- Mobile phone magnification and screen reading software
- Braille displays
- Braille embossers
- Palm top computers (PDAs¹⁶) designed for blind people
- Video magnifiers
- Screen magnification software
- Screen reading software

Other DPOs, e.g. Deafness Forum, Deaf Australia, Blind Citizens Australia, Vision Australia, Guide Dogs administer a range of *ad hoc* and informal arrangements, which provide great assistance to constituents but are often part of research projects and not sustainable without further funding support.

The Disability Services Unit of Telstra has similarly supplied mobile phones to persons with disabilities for the purpose of product trialling and research/development. This has included mobile phones for people with hearing impairment and other simple-to-

¹³ http://www.psc.state.ne.us/home/NPSC/equipment/pdf_equipment/coverltr.PDF

¹⁴ <http://access.nuim.ie/>

¹⁵ <http://www.abwa.asn.au/products.htm>

¹⁶ Personal Digital Assistant

use mobile phones with large print readout and large buttons, but these have not been added to the DEP.

1.3 Future demand

Question 5: Are there any future demand issues that should be considered further? For example, are you aware of any relevant international studies into the impact of ageing populations on the demand for specialised communications equipment?

There is sufficient demographic evidence within Australia that the demand for specialised communications equipment will rise as the population ages. The AIHW study cited in the Introduction to this submission gives an overview of the years that older Australians will live with disabilities. A report by Access Economics¹⁷ (2006) estimates that one in four Australians will have hearing impairment by 2050.

Future demand will see increasing need for assistive equipment accompanied by an inversely decreasing ability to pay. Increasing isolation of an ageing population could be minimised with judicious use of access to Information and Communications Technologies (ICT). This is not merely a communication issue but has implications for the cost of "ageing in place" versus the cost of institutionalised aged care. Use of ICT and Broadband services will help to maintain older Australians in their homes. Thus the opportunity cost of not providing assistive equipment could be high. These factors need to be considered in this feasibility study for an IDEP, although it does present difficulties for the Australian Government because the cost savings may be in health and aged care and at Commonwealth, State/Territory and local government levels, whereas the costs incurred to provide equipment may be primarily borne by the communications industry, overseen by the DBCDE in whatever is put in place for an IDEP.

Question 6: In your view, will technological developments continue to reduce the need for specialised equipment?

Although it can be argued that technological developments may lead to communication equipment being more adaptable and versatile, the diverse nature and severity of many disabilities will mean that assistive add-ons will always be needed. The increasing incidence of disability could also mean that the overall need will counterbalance any reductions achieved by technological advancements.

In addition, the degree to which technological developments may reduce costs of some components could be matched by corresponding increases in costs as the complexity of devices increases, such as will be enabled by IPv6 initiatives, e.g. a mobile phone which also operates an Environmental Control Unit, a digital software program which enables monitoring of a person's vital signs, and other in-home eHealth monitoring devices.

¹⁷ Access Economics: Listen Hear! The economic impact and cost of hearing loss in Australia, February 2006

1.4 Eligibility issues

Question 7: What eligibility criteria should apply regarding access to specialised equipment on an independent disability equipment program?

The existing government subsidies available to people on welfare support payments meet only a small proportion of the actual supply costs of communication services. The increase in the Telecommunications Allowance was welcome but is still limiting for persons with disabilities on low income for whom ICT is an essential security and community access tool. WWDA endorses the TEDICORE argument for a more comprehensive Communications Allowance which would better address inequities in accessing services.

An IDEP needs to address the supply of equipment, and should be independent of subsidies for supply of communications services. The IDEP should be available to any individual who is limited in their ability to access the telephone system. The definition of the telephone system now needs to include fixed line, mobile, wireless, Internet Protocol services and the Internet.

There should not be any income test up to a threshold level of \$3000 and beyond that level considered on a case by case basis. This is important so that persons with disabilities who are trying to be 'job ready' have access to equipment which enables them to acquire qualifications and to competently search for jobs. A drawback of the Workplace Modification Scheme is that equipment can only be supplied to the workplace once the person has obtained a position.

It is important in fact that equipment moves with the person, rather than being attached to a workplace, and that protocols are sufficiently flexible to allow equipment to be used in a variety of locations.

CASE STUDY #3

"Zac" has a severe vision impairment and uses a JAWS screen reader program and ZoomText on his home PC and laptop. This equipment was supplied through a university scheme in State A where he obtained a double degree in Arts/Commerce. Zac was successful in obtaining a graduate position in the Public Service of State B, and relocated to take up this position. However, he was not allowed to use his own equipment in the new office due to perceived 'security' concerns. It took 6 months for the State B public service procurement staff to purchase and install the appropriate equipment, by which time Zac had found another job in a position which allowed him to bring in his own equipment, and start professional work immediately.

Question 8: Should access to subsidised specialised equipment be subject to any income means testing? Please give reasons for your response.

Once employed, the ability to pay for assistive equipment certainly improves. The IDEP could be capped at \$3000 free from income testing with a 3-year limit on re-applications for equipment.

Persons with disabilities should have the ability to source other equipment, such as the Kreader Mobile (see page 7) on the open market, but apply for interest free loan for its purchase through the IDEP.

In addition an interest free loan system might address the needs of the immediate family of persons with disabilities who need assistive equipment. Currently, only the person with the disability is eligible for the DEP equipment. This can lead to a situation where a person has the Internet and mobile phone equipment to enable Video communication, but no-one to communicate independently with, even though this would be possible if family had similar equipment.

Communicating via the NRS or Video Relay Service serves as an alternative, and certainly needs to be maintained separately to an IDEP.

There would need to be flexibility in the IDEP so that supply of essential equipment such as a BrailleTTY machine, which exceeded the cap level, could be met on a case by case basis.

Question 9: *Is access to an independent disability equipment program accessibility or affordability issue? Please give reasons for your response.*

'Accessibility' and 'Affordability' cannot be realistically separated. Persons with disabilities do not wilfully seek out equipment which is top-of-the-range expensive and beyond their budget. Where assistive equipment is needed to maximise ability to participate in the workforce or community, its cost should not be the barrier.

Many persons with disabilities have had limited access to education and employment, and with high living costs associated with their disabilities, find that the welfare support payments on which they must live do not enable purchase of even the most basic of communications equipment.

Even where equipment is donated under some benevolent or 'welfare' scheme, inability to get sufficient training in its use means that a 'white elephant' rather than a communication tool has been supplied. Where persons with disabilities need in-home training, security checks must be carried out on the visiting trainer. This requirement is more likely to be met by staff of an IDEP outreach service, than with *ad hoc* charitable services.

Question 10: *Are the needs of people with disabilities on low incomes for access to mobile phones and computers substantially different from the needs of people without disabilities on low incomes? Please give reasons for your response.*

Persons with disabilities are often restricted to low income brackets because they have limited access to education, or if educated are unable to get adequately remunerated employment. Irrespective of level of income, persons with disabilities are impacted by the cost of disability – equipment, medicines, household and vehicle adaptations, and house heating/cooling costs. At lower incomes, a higher proportion of income is spent on these disability costs, thereby substantially reducing the amount which can be spend on ICT.

It would not hurt if for once it was the persons with disabilities who had the state-of-the-art equipment and were technology leaders in use of ICT to whom the non-disabled turned, e.g. for information and demonstration of how to maximise full capability of all features of a mobile phone. The IDEP could thus contribute to

improving the standing of persons with disabilities in the community and building community acceptance and inclusion.

Chapter 2: Possible organisational models

2.1 Different delivery models

Question 11: Are there any other potential delivery models?

Because 99% of the Australian landmass is in rural and remote areas, the reality is that persons with disabilities in these areas have had reduced access to ICT even compared to their non-disabled neighbours. The Australian Government has recognised the isolation brought about by lack of access to ICT through its Indigenous Communications Program¹⁸. The recent commissioning of 300 public community phones, announced by Senator Conroy on 16 April¹⁹, will use this program to link to 550 communities. The program incorporates public Internet Access Training in 120 remote hub communities (where hub communities are defined as having more than 100 permanent population). This program establishes a distribution and contact network to remote communities and this network could be utilised by the IDEP.

The question of display of equipment, its demonstration and training both of staff at the supply point and of the person to whom equipment is supplied, does need to be addressed. There are a number of IDEP-ready distribution networks available:

- Medicare Australia has 239 shopfronts located throughout Australia;
- Australian Hearing has approximately 380 sites distributed throughout Australia (see: <http://www.hearing.com.au>);
- Independent Living Centres are ideally suited to displaying and supplying assistive equipment, because they specialise in information about assistive equipment, and have specialist nurse, occupational therapist, and physiotherapist staff. A limitation is that they are only located in capital cities.

Importantly, there is a specific need to address the ICT equipment supply to those with complex needs and who are housebound because of their disability. This need could be addressed by working cooperatively with specific assistive technology organisations, such as NovitaTech. Such agencies could continue to work in this area, and using the greater mobility and expertise of their staff/technicians to access their closest IDEP supply facility, and arrange for equipment supply on behalf of their clients. Such co-operative working between the IDEP and specialists would enable complex solutions to be delivered to clients.

Specific organisations include:

- Ability Technology in NSW (http://www.abilitycorp.com.au/html/Ability_ContactUs_fset.htm),
- NovitaTech in SA (www.novitatech.org.au/)
- Technical Solutions Australia in Vic (<http://www.tecsol.com.au/TSA-About.htm>),
- Technical Aid to the Disabled network in all states (<http://www.technicalaidnsw.org.au/About/tadaust.php>), and

¹⁸ Government of Australia, DBCDE (2009) Indigenous Communications Program, accessed online 17 April at: http://www.dbcde.gov.au/communications_for_consumers/funding_programs_and_support/indigenous_communications_program

¹⁹ www.minister.dbcde.gov.au/media/media_releases/2009/025

- TADAustralia connect (<http://www.tadaustconnect.org.au/>). It should be noted that TADAustralia, in partnership with ispONE runs a medium cost Internet Service Provider service.

Question 12: What approach do you favour and why do you consider that this approach is better than the alternative delivery models?

WWDA does not specifically recommend any particular agency to deliver the IDEP. However, it believes certain agencies have particular potential.

Any delivery agency must have the following characteristics:

- Established Australia-wide shopfronts

It will be cost effective to use an already established agency, to which IDEP functions can be added. Although there are a number of agencies, both public and private which meet this criteria (e.g. Medicare, Australian Hearing, TADAustralia, Australia Post), WWDA favours Medicare as having the best potential to deliver an IDEP. It has 239 full-capacity shopfronts, an organisational focus on delivering excellent customer service (through active participation in the Customer Service Institute of Australia); well-established consumer consultation practices; a policy for employment of, and customer outreach to Aboriginal and Torres Strait Islanders; a policy of employing persons with disabilities; and a well-developed translation service for 17 foreign languages. Medicare Australia already delivers a wide range of programs amongst which are: 'Special Assistance Schemes' e.g. disaster relief, 'Organ Donor Register', 'Family Assistance Office' activities and the 'Childhood Immunisation Register'. In addition in some more remote locations they are co-located with Centrelink and are therefore well-placed for individuals who access the IDEP to also access employment programs.

- Training programs for both those that access the IDEP and staff who work in it;
 - A wide choice of equipment and software, including fixed-line, mobile, wireless, Internet Protocol, and Internet;
 - Ability to hire equipment for long and/or short term use;
- or
- Ability to purchase equipment on interest free loan;
 - Ability to install, maintain and train users of equipment;
 - A policy of employing persons with disabilities, and therefore a high proportion of staff who are persons with disabilities;
 - Ability to liaise closely, and work cooperatively, with DPOs, e.g. Vision Australia, Blind Citizens Australia, Deafness Forum and Deaf Australia; and
 - Operate outreach services to persons with disabilities in a wide range of communities.

WWDA believes that an IDEP should be independent of carriers, but have the ability to liaise with carriers as necessary to achieve the best outcomes for consumers. The current arrangement has put undue burden on Telstra, not adequately funded by Universal Service Obligation levies, and has been restrictive and anti-competitive for consumers. The whole point of establishing an Independent DEP is that it operates independently.

Question 13: Is an outreach service essential? Why? If so, how should it operate?

An outreach service is an essential arm of an IDEP. It would need to have flexible outreach arrangement incorporating some activities which function in a manner similar to the service operated by Job Access. The Job Access Advisors²⁰ work primarily in assisting employers of persons with disabilities. Much of the work is done 'remotely' and this would not be satisfactory for persons with disabilities. However, a team of such advisors could work in closely with other agencies already listed, such as the Indigenous Community Program workers, Medicare Australia shopfront staff, Australian Hearing staff and DPO regional offices.

The IDEP would need to operate a loan scheme whereby equipment could be trialled. The Zygo private company, through its arm Zyteq²¹ specialises in supply of speech generating devices as well as other technical aids to assist in independence in daily living. It operates a short term loan scheme:

- to enable a person to try the equipment to see if it is suitable;
- for support people to experience programming and setting up the device to determine if a proposed process is manageable; and
- to replace a piece of equipment which is being repaired.

There is no cost for borrowing equipment. The only cost incurred by the borrower is the cost of returning the device to Zyteq (South Melbourne) by registered post. The length of the loan depends on the nature of the equipment, the needs of the user, and is negotiated either at time of borrowing, or during the loan term if needed.

Zyteq also conducts training and outreach services to assist owners or support workers to improve their use of equipment. Training sessions are generally held at no cost, and are organised both for individuals, and for groups according to need. Where the support needed is not complex, staff provide step-by-step assistance either by phone or video.

A similar model of operation could be incorporated in the operation of the IDEP.

WWDA believes that these two examples –a government and a private outreach service, show that a viable outreach service could be conducted.

Chapter 3: Governance

3.1 Governance structures

Question 14: Are there any other potential governing models?

An IDEP needs to be funded via a Universal Service Subsidy scheme to which carriers, carriage service providers, internet service providers, content providers, aggregators etc. contribute. It needs to have the status of an Authority. The IDEP may need some government funding at the outset. It needs to be separate to the Australian Communications and Media Authority, and have direct links to the DBCDE.

²⁰ <http://www.jobaccess.gov.au/JOAC/Advice/JobAccessAdvisers/>

²¹ <http://www.zygoaustralia.com.au/content/newtoassivetechology.html>

The IDEP would consist of:

- i. A Governing Council with a majority of consumers as Councillors, appointed by government in the first instance;
- ii. A Steering Committee of DPO representatives and Carrier representatives, with a majority of DPO representatives, e.g. from TADAUST, Deaf Australia, Deafness Forum, Vision Australia, Blind Citizens Australia;
- iii. A Philanthropy Unit with charitable status, which would accumulate funds for international cooperation, research and development, etc. and to subsidise special cases where requests for equipment made under the regular IDEP scheme could not be met. This could be a special case of the Disability Investment Group mechanism currently being investigated by Government as a means for increasing private sector involvement and investment in the funding of general disability services;
- iv. The existing Telstra program, either compulsorily acquired or purchased from Telstra on a cost recovery basis; and
- v. A Directory Assistance Helpline (currently operated by Telstra); and
- vi. A Disability Enquiry phone service.

Question 15: What sort of governance structure should apply to administration of an independent disability equipment program?

The governance structure set up needs to have high levels of consumer input, draw its funding from a Universal Service Subsidy scheme, ultimately be independent of departmental funding, and operate as a separate government authority.

3.2 Oversight and compliance

Oversight and compliance monitoring would need to be undertaken by a Compliance Committee dedicated to this task. The committee would need to comprise a majority of consumers, but also have technicians, therapists from organisations which undertake cooperative work with the IDEP staff represented on it.

Chapter 4: Types of equipment

4.1 Equipment, software and other technologies

Question 16: What types of specialised equipment should be included on an independent disability equipment program?

The specialised equipment included in the IDEP should be decided by negotiation with specific disability DPOs. Staff in these DPOs have the expertise to advise on what equipment is needed by their respective constituents.

A guiding principle could be that off-the-shelf items which are in the low-average cost brackets AND which have features which make them usable by persons with disabilities are not included in the program.

Similarly a computer is an off-the-shelf item, and computers with small Hard Disk Drive capacity, and limited features can be purchased for minimal cost. Recycled computers also may be purchased at low cost. However, a computer with sufficient capacity to support both ZoomText and JAWS should be available through the IDEP.

Similarly high-end mobile phones required by people who are blind to run Talks, etc., or a PDA such as the Treo 700w²², using Windows Mobile V5.0 to run Cepstral software to enable it to function as a speech generating device, should also be included.

Question 17: What types of equipment should be excluded?

The equipment which should be excluded is that which is worn by an individual, e.g. hearing aids, glasses, cochlear implants. An induction loop on neck cord is not regarded as being in this category.

Equipment designed for public places, government buildings, organisational places, e.g. hearing loops should also be excluded.

Question 18: How could people's understanding of the features of their phones and computers be improved?

Improved knowledge about the capabilities of off-the-shelf equipment can be gained by developing a comprehensive database which would enable comparison of the Accessibility Features of phones as mandated by the ACIF Code C625:2005 "Information on Accessibility Features for Telephone Equipment", and using the matrices supplied in the accompanying Guideline G627:2005 "Operational Matrices for Reporting on Accessibility Features for Telephone Equipment" as a minimum for information. Consideration could be given to developing such a database a part of an IDEP. A website with general product information would have to be developed and maintained, and a link to this more specialised database would be practical.

The potential for operating practical loan services and outreach services has been discussed elsewhere in this submission. These would contribute to assisting people to understand the features of their phones and computers, and get maximum benefit from them.

WWDA agrees that non-disabled persons use a reduced range of the features which are available on their phones. However, they often have a range of communication alternatives, and use of the features is not essential to their making contact with others, whereas use of these features is essential to persons with disabilities. For example, the presence of the raised 'pip' on the #5 key is seldom even noticed by those for whom it is not relevant, whereas it is an essential tactile orientation feature for a person who is blind. Similarly the presence of a hearing loop coupler on a phone is not noticed, but is essential for a person using a compatible hearing aid. For persons with disabilities, knowing about the assistive features of their phones can make the difference between contact with the outside world and confinement to abject isolation.

4.2 Making equipment available in Australia

Question 19: In your view, is there any specialised equipment that is not currently available in Australia that should be added to an Australian disability equipment program, if possible? Why? How many people would benefit if this equipment was available?

Improving the flexibility in current licensing and importing arrangements would be necessary to enable supply of small numbers of devices which have particular

²² <http://www.instructables.com/id/SEA4Q24FRBPY1VK/>

features. One-off importation licences could be arranged. Flexibility could be achieved by enabling the IDEP to have a special licencing arrangement with manufacturers/importers/ACMA.

A Government procurement policy could assist with increasing the volume of importation of equipment which is particularly useful for persons with disabilities. Procurement policy can be changed. For example government procurement guidelines were revised in 2008 in order to make it easier for government departments to employ Australian Disability Enterprises (formerly known as Business Services which were formerly known as Sheltered Workshops) in cases where they represent value for money.

Much assistive software and equipment is available in Australia, but technical restrictions prevent its use, e.g. restrictions to the installation and operation of real time of Text over IP software.

The establishment of a Research and Development arm of the IDEP would keep the program up to date with developments through networking online with similar agencies overseas.

Australia is an island but not isolated. People travel, and persons with disabilities are constantly on the lookout for new equipment. Specific manufacturers have particular interest in the disability market, e.g. Nokia. Vodafone was interested enough to import the big button Vodafone Simply mobile phones. Telstra made adaptations to its 'blue tick' series of mobile phones in order to improve their operation on the NextG network and their suitability for people using T-switch hearing aids. So the argument that Australia is a small market, and that it is not possible to change phone specifications is not valid. As more countries, with larger populations, ratify the CRPD more manufacturers and importers will become interested on an international scale.

Meeting the compliance requirements of smaller markets such as Australia should not be difficult if equipment is coming from similar developed economies such as USA, Canada, Sweden, NZ, and the UK.

A minor difficulty may be that phones manufactured in emerging economies such as China and India, may have compliance shortcomings for Australian conditions. However, global pressures to produce high quality phones will have an affect, and both countries have an obligation to meet the communications needs of their populations with disabilities. China ratified CRPD on 1/8/2008 and India on 1/10/2007.

Chapter 5: Funding

5.1 Funding sources

Question 20: Which is the most suitable funding option and why?

The IDEP should obtain its major funding through a Universal Service Subsidy scheme. Start-up costs should be limited by limiting the range of equipment initially available, with this range being expanded gradually. The initial program would be basically similar to the existing DEP with the advantage that access to it would be independent of the carrier used by the client.

Equipment could be added gradually, over a 5-year plan, in consultation with DPOs. Recruitment and training of advisers could take place gradually.

The number of people who would need to apply for assistive equipment would be very much less than the number of persons with disabilities since many persons with disabilities do not require assistive equipment.

Although the incidence of disability will increase with the ageing of the population, the need for high-end very expensive equipment, such as the BrailleTTY cited in the discussion paper may not increase at the same rate.

Question 21: How could people with disabilities' knowledge about the features available on phone, mobile phone and computer equipment be improved? Is their situation any different from people without disabilities in this regard?

In the non-disabled population, there is increased reliance on mobile and wireless devices for communications. Limiting the IDEP to the fixed line services is now discriminatory. For people who are blind and vision impaired, mobile and wireless devices offer the potential for interaction with the non-disabled population on an equal level.

As outlined in this submission, the operation of the IDEP would have great benefits for the non-disabled. An IDEP website would contain much information to assist the non-disabled to maximise use of all the features on the ICT equipment, especially features of mobile phones. It would be beneficial for all if the IDEP and its information website became known as the exemplar for information on phone equipment. This would assist in mainstreaming disability and fostering acceptance and inclusion of people with disabilities.

CASE STUDY #4

"Belinda" who is legally blind, outlined the liberating affect that using the JAWS screen reader program had had on her life. Being able to use a screen reader program on her computer had allowed Belinda to read newspapers, look up recipes, keep in touch with people through emails, do research on the internet, write her own correspondence, and obtain a university degree by enabling her to do independent research and write essays. Belinda regards JAWS as an essential piece of ICT equipment.

In addition, Belinda believes that her life is transformed by the availability of mobile technologies. She has trialled a mobile phone which has both 'Talks' software and uses the Wayfinder Access software. This latter software operates in conjunction with Global Positioning System (GPS) web access to enable the user to get accurate real-time descriptions of location and points of interest in their surroundings. It enables Belinda to go to new locations independently, and has increased her mobility considerably.

A mobile phone with these capabilities would enable her to live much more independently and would enhance her employability. However, she is unable to afford the top-of-the-range phone which can support these technologies, or to afford the mobile phone plan which would enable sufficient data download to use the GPS effectively.

In addition, Belinda currently uses a 'Bluephone' on her fixed landline. This phone has been supplied by her local council and has a back-to-base alert system for emergencies. However, the handset is so heavy that she is prone to drop it and inadvertently trigger the alarm. In addition the keys on the keypad are large and have such a large separation between them that she finds it difficult to navigate between keys. She believes that an IDEP may be able to assist in getting manufacturers to design a less cumbersome handset.

Belinda would like an IDEP to carry at least one mobile phone which has both speech readout software and Wayfinder Access software²³.

Conclusion

WWDA believes that the establishment of an Independent Disability Equipment Program is feasible and that its operation will enhance the lives of persons with disabilities and improve the establishment of an inclusive Australian society.

²³ www.wayfinderaccess.com/ training information is available from Guide Dogs NSW/ACT phone (02) 9412 9300