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WWDA Submission to the 2005 Review of the Telecommunications Consumer Representation & Telecommunications Research Grants Program (Department of Communications, Information Technology & the Arts)

Women With Disabilities Australia (WWDA), as the peak consumer body representing women with disabilities in Australia, is pleased to have an opportunity to comment on the Telecommunications Consumer Representation and Telecommunications Research Grants Programs. WWDA has valued the support it has received from the Department of Communications, Information Technology & the Arts (DCITA) through the Telecommunications Consumer Representation Grant Program. The grants have enabled WWDA to keep its constituents informed about telecommunications services, research and development; and to give feedback to government on telecommunications issues which particularly affect them. In this submission we address the items listed in Section C of the Review Discussion Paper issued by DCITA.

In this submission, WWDA uses the term telecommunications in its broadest sense to encompass the widest range of information and communications technologies (ICT) and to include the converged environments of communications and broadcasting.

C) ISSUES ON WHICH COMMENT IS SOUGHT

1. Do you consider that there is a continuing community need for the Consumer Representation Grants Program? Why?/Why not?

WWDA considers that the need for community/consumer representation in telecommunications is greater now than even before. The telecommunications environment has changed. With the convergence of communications and broadcasting, consumers are affected over a broader range of issues. Telecommunications tends to be technology driven. Market forces do not necessarily deliver the most logical, ecologically and economically sound outcomes or outcomes which are suited to mainstream consumer needs. Furthermore, the needs of consumers with particular communications needs or restrictions can be completely ignored. Consultation with, and feedback from consumers is needed in either a self regulated or government regulated environment.

2. If you consider there is a continuing need, what would be the likely consequences of not extending the Consumer Representation Grants Program?

The Consumer Representation Grants Program enables systematic involvement of consumers. It provides a cost effective feedback mechanism to government and industry. This helps ensure that needs of all

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consumers are met, rather than those of selected areas of high profit margins consumers. Without the Consumer Representation Grants Program, developments would be skewed to cater for 'big' business needs and for the needs of high volume individual users who are able to pay for elite, specialised services. The needs of ordinary domestic consumers, economically disadvantaged consumers and consumers with needs for assistive/ adaptive peripherals would be overlooked.

3. Do you consider that there is a continuing community need for the Telecommunications Research Grants Program? Why?/Why not?

There is a continuing need for the Telecommunications Research Grants Program. Research undertaken by Industry stakeholders is for technological development for competitive gain and tends to be concentrated in areas of maximum monetary return. Research in unprofitable areas, addressing the needs of small groups of disadvantaged consumers needs government funding. Because of the increasing complexity of the technologies and equipment, more funds need to be allocated to the research grants program.

4. If you consider there is a continuing need, what would be the likely consequences of not extending the Telecommunications Research Grants Program?

Without the research grants program, research into areas which will have little or no economic return will cease to be undertaken. This would result in larger numbers of disadvantaged consumers (especially those needing assistive equipment to have equitable access to services) being unable to participate in telecommunications with all the negative social and economic benefits which would then be foregone. The current research grant program only enables relatively low key research to be undertaken by consumer organisations. It therefore only caters for a small percentage of consumers. The outcomes of this research, such as that undertaken by the Australian Rehabilitation and Assistive Technology Association (ARATA), are excellent. Consideration needs to be given to supporting a greater number of community organisations to undertake more comprehensive research. Consideration also needs to be given to creating incentives for commercial companies to undertake research for disadvantaged communicators. At present such research only undertaken because the Universal Service Obligation which provides an obligations for research in unprofitable areas of telecommunications.

5. How effective has the Consumer Representation Grants Program been in achieving the desired impacts or objectives for the community? How could the Program be made more effective?

The Consumer Representation Grants Program has had great success from some projects, and limited success when judged overall. However WWDA believes it is the best model for achieving the best outcomes for consumers. The limitations on its success have been in the lack of status accorded to consumer groups by industry stakeholders. This is reflected by some sections of the industry ignoring consumer advisory body requests and input. There are limitations on the quality of representation because there is no funding or programs to train representatives. The area is complex, the legislation voluminous, and the technologies undergo constant change. Training is needed so that lay consumers can make effective contribution.

Feedback mechanisms need to be strengthened. The current Grant report process needs to be maintained. However, better feedback to grantees from DCITA is needed. Acknowledgement of particular research undertaken, or of activities undertaken beyond the basic requirements of the grant would be appreciated. The feedback needs to be to individual grantees, as well as an annual summary of activities of all grantees provided. An biannual or annual forum of all grantees would enable positive exchange of information, and the opportunity to give combined feedback to DCITA, and for all grantees to learn of the overall range of activities and know the type of feedback being given.

6. How effective has the Telecommunications Research Grants Program been in achieving the desired impacts or objectives for the community? How could the Program be made more effective?

WWDA has not been a participant in this program and limited information about research undertaken. It would be beneficial if DCITA facilitates sharing of research results. The program needs to be expanded (see Question 4).

Other issues of importance on which comment is sought can broadly be grouped under two headings:

- 1) *the appropriate level and duration of any future funding and activities funded; and*
 - 2) *the processes and criteria used to select grant recipients.*
- (i) **The level of funding provided, and duration of grants**

7. Do you consider the level of funding that is currently provided under the Consumer Representation Grants Program to be about right/too high/too low? Why?

This question is addressed in the context of some of the background information given in the Review outline. The information referred to has been left in 'bold' type.

Provision should also be made for additional resources to assist people with disabilities participate in industry processes and conduct awareness raising activities.

In consideration of the level of funding:

The level of funding to the consumer and research programs has fallen drastically in real terms over the past 4 years, whilst the level and complexity of work has risen. The 'increased' allocation of \$3.2 million over 4 years, equates to \$800,000 per annum with the amount allocated for 2005-06 being \$700,000. In 2004-05, more than \$560,000 went to 3 organisations (CTN, SETEL and TEDICORE). The total amount was further drawn down by allocating 10% to an industry group (ACIF) rather than to disability organisations themselves, and the representation amount was further depleted by allocating approximately 12.5% to the research program.

This means that all disability organisations have been doing much greater amounts of pro bono work for the Government. Organisations allocated small grants have been greatly affected by the increases in the volume and breadth of work. For example, WWDA cannot adequately represent the interests of its constituents and conduct awareness raising activities unless it keeps informed of new developments, technologies and policies. It has simply been unable to cover all issues, has been unable to participate in some important meetings, and has not made submissions to Government, the ACA and ACIF on a number of occasions.

In addition, there are gaps in the allocation of funding. Some consumer groups, such as the Communication Aid Users Society (CAUS) are in need of special consideration and support and have been unsuccessful in obtaining an adequate level of funding to participate. Such organisations need 'capacity building' funding as well as consumer representational funding. As a result, their isolation is exacerbated.

WWDA relies heavily on TEDICORE to keep up-to-date on national and international matters; to represent the interests of people with disabilities; to keep its Project Advisory Body members informed so that awareness raising can be passed on to organisations' constituents. However the volume of work which this organisation undertakes is not sustainable at their current levels of funding. If TEDICORE is unable to adequately advocate for people with disabilities then this lack is passed on to all disability organisations and to all consumers with disabilities.

Funding to TEDICORE needs to be increased so that extra staff can be employed to spread the burden of the extremely high workload. TEDICORE is delivering great value for money (one of the selection criteria) for DCITA. Its work is recognized on an international basis, and as such delivers kudos to DCITA and the Australian Government in general. To function at this level, given its current amount of funding, TEDICORE effectively subsidises the Government by providing unfunded office space and facilities and a high degree of unpaid representational work.

WWDA comments on matters relating to an organisation other than itself, because it relies so heavily on TEDICORE to fulfill its own obligations to meet the funding criteria.

For all organisations, levels of funding need to be linked to the CPI to be able to provide realistic support for consumer representation.

The objective of the consumer representation funding is to support adequate representation of consumers' interests in a self regulated telecommunications environment by enabling:

□ ***consumers to have a voice in the development of industry codes and practices and other telecommunications industry processes that affect them;***

It is essential that levels of funding are such that consumers can have an equal voice with industry representatives in the development of industry standards, codes and guidelines. Government support is needed from both DCITA and ACMA so that industry stakeholders are made aware that the consumer voice is not just a token contribution, and that they are equal players in the marketplace. Where consumers are members of ACIF Working Committees (WCs), there needs to be consideration given to the additional time and effort put in to these processes where the negotiations are protracted and intense, as has been the case with the CECRP WC/19 during 2005. For industry participants, this work is part of their 'core business'. For a consumer organisation (such as ARATA or WWDA), this is not the case, and consumer group WC members have to neglect their 'core business' in order to participate.

Such representation could be regarded as TEDICORE 'core business', but their funding level needs to be increased for them to be able to sustain such input. Increased funding is needed to enable it to continue its input in this area without there being a detrimental affect on the large volume of other work undertaken.

8. Do you consider the level of funding that is currently provided under the Telecommunications Research Grants Program to be about right/too high/too low? Why?

to support high quality, empirical research in connection with social, economic, environmental or technological implications of telecommunications developments that will inform Government policy on telecommunications industry development and regulation.

The level of funding available for research is inadequate. There is a great unmet research need evident in the large number of applications which are received and are not successful.

There is urgent need for **longitudinal studies** to look at the social, economic and environmental or technological implications of telecommunications developments. These are complex studies of pivotal importance, and may be beyond the capacity of individual consumer organisations. Funding should be made at a level which would enable a consumer group to work in conjunction with a relevant specialist professional consultant. Grants in the order of \$500,000 per annum are needed.

The current levels of research program funding enables only small scale projects to be undertaken. There is no residual funding to enable the results of the research to be disseminated to benefit larger numbers of people with disabilities. The size of annual grants needs to be increased so that larger scale projects can be undertaken. The current levels of grant allocations in this area need to be increased.

Expansion of the research program must not be done at the expense of the consumer representation program.

9. Do you consider that Consumer Representation Grants should be provided for a period of one year or longer?

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10. If you consider that Consumer Representation Grants should be provided for a period longer than one year, why and what would be an appropriate period for the grants?

It is essential for organisations such as TEDICORE, CTN and SETEL to be funded on a 3-year basis. Their work is ongoing, rather than in finite 'project' areas. Their core business is telecommunications, and they require long term funding for recruiting and staff security of tenure. Strategic planning needs to be done on a long term basis. In conjunction with this, reporting requirements need to be practical, so that staff time and project money is not disproportionately dissipated in such activity.

For other community organisations whose 'core business' is not telecommunications, funding on a three-year cycle is also preferable. However, annual funding may be continued so long as application requirements for organisations seeking ongoing funding are streamlined. In addition, reporting requirements should be rationalised. This would mean that more time could be spent on telecommunications business rather than on reporting on and applying for funding.

11. Do you consider the objectives of the Consumer Representation Grants Program set out in the Program Guidelines to be appropriate? What changes, if any, would you recommend?

The current Guidelines include essential elements. However, WWDA recommends that 'dot points' 1, 3, & 4 contained in Section A.2 of the document are moved to Section A.1.

12. Do you consider the objectives of the Telecommunications Research Grants Program set out in the Program Guidelines to be appropriate? What changes, if any, would you recommend?

The current Guideline is appropriate but esoteric, and is not reflected in the type of research which is funded, with the amount of funding being inadequate to meet the guidelines in anything but their most basic form. In making this observation WWDA does not wish to detract from the excellent research which has been undertaken under the program, and the real benefits which have accrued to consumers from the research findings.

13. Do you consider recent practice of specifying priority areas for research in the Telecommunications Research Grant Program Guidelines to be appropriate?

WWDA agrees with this statement. The current priority areas need continued support. However, WWDA is not certain what criteria were used to select the current priority areas, and believes that some areas of importance may therefore have been overlooked. WWDA also does not know if, and how DCITA changes these priority areas from year to year. There is thus great potential for areas of importance to be overlooked. WWDA believes that the TIO would be able to identify additional priority areas. Once again, the requirements of high support need groups, such as CAUS appear to be overlooked.

(ii) Processes and criteria used to select grant recipients

The suitability criteria for selecting Consumer Representation Grant recipients set out in the Program Guidelines are as follows.

- 1) The extent to which benefits and outcomes of the project relate to the Program's objectives.**
- 2) The extent to which the project represents value for money.**
- 3) The organisation's capacity to effectively represent the project's target group.**
- 4) The organisation's commitment to working cooperatively with representatives within the telecommunications industry to achieve negotiated outcomes.**
- 5) The applicant's demonstrated ability to manage the project well.**

WWDA believes that these selection criteria are adequate. It believes that Criteria #3 is of great importance. The organisation needs to demonstrate its capacity to act as a conduit of information both from, and to its constituents; and to have a good track record in doing this. For example, WWDA has conducted Action Research over the past 5 years, by consulting with its constituents. It frequently seeks feedback on issues, so that its representatives on advisory bodies can give informed advice. It also regularly disseminates information to its constituents, and acts as a key informant in research conducted by State/Territory organisations, by carriage service providers, and by consultant researchers.

The suitability criteria for selecting Telecommunications Research Grant recipients set out in the Program Guidelines are as follows.

- 1) The extent to which the project will provide significant benefits and outcomes in terms of the Program's objectives.**
- 2) The extent to which the project has a sound methodology including appropriate review and quality control arrangements.**
- 3) The extent to which the project represents value for money.**
- 4) The extent to which the applicant has a demonstrated ability to manage the project.**

WWDA believes that the selection criteria should include a requirement to estimate the number of consumers who may benefit from the research.

14. Do you consider the suitability criteria for selecting Consumer Representation Grant recipients to be appropriate? What changes, if any, would you recommend?

WWDA considers the suitability criteria to be appropriate if suggestions made (above) are incorporated. .

15. Do you consider the suitability criteria for selecting Telecommunications Research Grant recipients to be appropriate? What changes, if any, would you recommend?

WWDA considers the suitability criteria to be appropriate if suggestions made (above) are incorporated. .

16. Do you consider the process of selection of grant recipients to be appropriate for the Consumer Representation Grants Program? What changes, if any, would you recommend?

In view of the fact that the number of applicants outstrips that of grants available, the process of selection is precarious.

17. Do you consider the process of selection of grant recipients to be appropriate for the Telecommunications Research Program? What changes, if any, would you recommend?

Similarly, the funding process is precarious. Please also refer to comments made at Question 8.

(iii) Consumer Driven Communications (CDC) report

DCITA seeks views of consumer bodies on certain issues raised in the CDC report.

18. In the context of CDC recommendation 21, what activities, in order of priority, should be included in any potential expansion of the Programs?

- Funding needs to be available so that the three major policy bodies (CTN, SETEL, TEDICORE) can participate in international forums where consumer considerations are under discussion, and where new technologies are under discussion. TEDICORE must especially be able to participate in the latter forums because the implications for people with disabilities needs specialised input;
- Funding needs to be allocated to train and mentor new consumers from community organisations so that they can become effective representatives;
- Current representatives need to be included in such training. Many have entered the field without any background information being given about underpinning legislation, etc.;
- Dialogue between consumer representative advisory bodies and service providers, importers and manufacturers of equipment needs to be conducted to raise awareness of consumers needs, and the role of consumers as equal partners in the self regulatory processes in communications;
- The development of an Independent Disability Equipment program, with consumers integrally involved in its operation needs to be investigated;
- Grantees need to be able to meet with DCITA reps on a regular basis (ideally twice per year) for mutual information sharing, and to minimise overlap of project activities. This will enable greater coordination of inputs from grantees and deliver better outcomes to DCITA;
- Funding of the three major policy bodies (CTN, TEDICORE and SETEL) needs to be sufficient so that they can each conduct a face-to-face annual forum. The funding for TEDICORE needs to take into account the additional costs of travel, accommodation and participation for people with disabilities;
- Dissemination of information is increasingly done via organisations' websites. However, the upkeep of websites is time consuming and costly. Funding needs to reflect this.

19. How might 'scalability' and 'stability' of funding, as proposed in CDC recommendation 21, be achieved?

Stability of funding has already been addressed earlier in this submission. Three year funding cycles for the 3 major grantees is essential. The level of funding needs to be linked to CPI increases. This applies to all grantees. In addition, funding levels for the major bodies needs to take into account the broader area which now constitutes the communications 'umbrella'.

20. Do you consider it appropriate for representatives on the Consumer Advisory Council and the Disability Advisory Forum of ACIF to receive sitting fees under the Consumer Representation Grants program?

Representatives on the ACIF DC and ACIF CC certainly need sitting fees for their representative work. Additional considerations needs to be given for representatives who work on ACIF Working Committees. A scale of remuneration needs to be worked out according to the number of meetings, and their duration where the WC process is prolonged.

However, it is a mark of the lack of commitment of industry to the participation of consumers in the self regulation process that the funding for this participation does not come from ACIF itself. The need to address this lack of recognition is discussed elsewhere in this submission. WWDA believes that ACIF should provide appropriate funding from within its own budget.

(iv) Program management issues

21. Do you consider that feedback from the Program management on reasons for non-selection or partial funding only has been adequate? What changes, if any, would you recommend?

On administrative matters, WWDA believes that communication with and feedback from the Desk Officers involved in the TCRG program has been excellent. They have fostered a feeling of there being a sympathetic and cooperative approach to administrative matters, especially during the initial grant award phase, and during the grant period. What has been lacking is feedback about the quality of the project activities, especially as documented in reports, and in particular where the deliverables have exceeded those specified in the grant deed. There is no acknowledgement of the usefulness of research conducted or that it informs government policy.

22. Do you consider that grant deed administration, payment arrangements on receipt of tax invoices and processing of progress reports has been effective and timely? What changes, if any, would you recommend?

Payment arrangements are practical. Processing of reports is effective and timely, but clinical and somewhat superficial (as outlined above), giving a feeling of having worked to satisfy a number of 'tick boxes' rather than having contributed to the development of good policy and practice for Communications in Australia. Having a biannual or annual forum of grantees and at the same time meeting with DCITA personnel would go a long way to overcoming this shortcoming of the grant process. Such a meeting would also act as an excellent orientation exercise for new grantees.

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