

Submission to:-

Australian Government Productivity Commission.

Subject:-

Telecommunications Universal Service Obligation and the Issues paper dated June 2016 and the Productivity Commission Draft Report dated November 2016

Submission in response to the above from:-

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All Mod Comms Pty Ltd trading as

Printacall Communications Technology (PCT)

Concerning TTYs, Associated Technology and other Customer Premises Equipment for Sensory Disability

20th January 2017

1.0 Introduction

This paper is in response to the invitation for further comment upon review of the Productivity Commission's Draft Report. We are heartened by the common-sense initial findings of the Commission with regards to the accessibility of telecommunications services for people with disability, particularly deafness or hearing impairment, and the recognition of the need for targeted government intervention (Finding 6.3). The purpose of this paper is to provide further input to the Commission based on the findings and recommendations already made and should be read in conjunction with our earlier submission (sub 15).

1.1 The submitter

Printacall Communications Technology (PCT) is a supplier of lifestyle equipment to individuals who are deaf or hearing impaired and to organisations to assist their access obligations towards deaf and hearing impaired people. Its key areas being **Telecommunications Customer Premises Equipment**, Audio Enhancement equipment in particular Powered Audio Loops for public buildings and classroom Soundfield Systems.

PCT is the sole supplier of TTYs to the Australian Market representing the world's leading supplier of TTYs and associated Technologies and providing technical support.

PCT supplies Telstra Corporation (TLS) with TTYs in the performance of their Universal Service Obligations(USO) and manages on their behalf under an evergreen contract their logistic programs in the supply, warranty, servicing, return and exchange of TTYs. PCT has carried this work out as a primary support contractor to TLS in respect of its USO since 1998 but has been a supplier to the open market including TLS since 1984. PCT commits under the above contract to meet the timetables required of TLS in supply and replacement of the Customer Premises Equipment (TTYs) for severely and profoundly deaf and hearing impaired people, and people with speech impairment, under their USO to any location in Australia and holds inventory on behalf of TLS to assist in that obligation.

PCT also supplies Optus and manages a similar small supply and service program on their behalf.

PCT arranges all approvals and holds the Approval Folders for all TTYs supplied in Australia to meet ACMA Interconnectivity standards, Emission standards, and Power Safety standards.

PCT also introduced Captioned Telephony concepts into Australia before passing the technology to Australian Communications Exchange for potential development in this country and application in respect of the NRS as it was a network and call centre focussed technology.

1.2 Net Benefits to the Community of Accessibility of Services

In the Draft Report section titled 'Commission's Approach', it is stated that "Governments should only intervene where there are net benefits to the community. The relative merits of policy options should then be assessed against cost-effectiveness criteria..."

PCT would therefore like to point out the details of the net benefits to the community of the ongoing provision of TTY.

1.2.1 Community Inclusion of a Disenfranchised Group

As previously noted in our first submission, the “Deaf Signing Community” has over many years both in Australia and in other developed nations formed a “unique and separate culture”. This separate “culture” in Australia embraces Auslan as a first language and in addition, for many deaf particularly older people, TTY as not only their preferred method, and in some cases, their only method of communications by telephone one to one or through the NRS. They have a proprietary or ownership approach to Auslan and similarly to the TTY. We have also noted that the vast majority of current TTY users, due to age and other factors, range from unable to reluctant at best to adapt to new technologies.

The majority of current TTY users were born in the first half of the twentieth century. At that time, being deaf was often equated by general society with a lack of intelligence, leading to poorer schooling and employment opportunities, which in turn led in many cases to a sense of perceived or real disenfranchisement and isolation.

When introduced, the effect of the current TTY program was to reduce this sense of isolation and bring TTY users more into the mainstream; bolstering the economy through greater access to services. For many, perhaps for the first time in their lives, they felt society and government were making an attempt to include them. This was greatly enhanced with the introduction of the NRS, enabling these consumers equal access to their hearing peers.

PCT’s concern is that any attempt to change the TTY program, or to limit the NRS, no matter how small, could be perceived as abandonment by the government and could potentially lead to unforeseen consequences and costs, particularly in aged and health care, forcing some in care due to lack of access (whether by reduction in the TTY program or the NRS). In expressing this concern, we are also aware that we are offering no hard data to support the argument. It is however based on our 30+ years of dealing with TTY users and their needs and we believe it is a very real concern for the government’s consideration.

1.2.2 TTY is the best technology for Emergency Service contact

As a fixed line technology, TTY through the NRS is undoubtedly the most stable and reliable platform for contact where time is of the essence, such as when Emergency Services are required. The potential alternatives to TTY, as outlined in Table 6.6 of the Draft Report (Live chat, Facebook Messenger, email, Twitter Direct Messages) are all subject to package loss and time delay due to latency and other communication issues. While no technology is foolproof, TTY has a proven track record in maintaining connection speeds. As stated previously, many of the existing TTY users do not have the capacity to change to other technologies, hence making emergency services access impossible for them.

We further reiterate our previously made point that TTYs are fully interoperable with the NBN or through any cable or legacy copper connection to or within premises. TTY has also been tested by TLS with NBN Wireless satellite. There are at this stage some unknowns in TTY through NBN fixed wireless which would need to be investigated if the decision was made to make such a change, involving cost and potential disruption of service.

1.2.3 No additional Costs incurred

By keeping TTY provision in conjunction with the NRS, no further costs will be incurred. A change to any other platform would require a period of technological and managerial process investment as well as retraining of aforementioned users reluctant or unable to learn new technology. Since it is likely that the current users of TTY will diminish over time, the gradual phasing out of this technology (based on usage) would appear to make the most economic sense.

We reiterate that PCT has no argument with the alternatives of Direct Government funding for disability services and equipment providers versus an industry levy on volume. Our only concern is that the funding for TTY allows for both supply and management of the program, and this model has proved reliable and efficient. The specialist skills of PCT have allowed a small but significant nationwide service to be delivered with excellent effect for clients with hearing loss and the USO contractor Telstra.

1.2.4 Supply of TTY's Guaranteed

PCT would like to make clear that we have undertaken a careful planning process in conjunction with both Telstra as USO contractor and Ultratec, our supplier of TTY equipment, to ensure we have access to sufficient original equipment and/or replacement parts in order to guarantee supply of this technology for the foreseeable future. This again reduces the need for any further government investment save the continuation of the current levels, which are miniscule by comparison to the overall telecommunications investment.

1.3 Cost/Benefit ratio is high

PCT respectfully believe the above factors combine to show that the cost/benefit equation of government intervention in the 'market gap' of provision of telephony services to the deaf and hearing impaired via TTY technology and the NRS overwhelmingly result in a net benefit to society. The Productivity Commission's Draft Report appears to come to a similar conclusion when it states in Draft Finding 6.3,

Notwithstanding that technological advances could reduce these costs, the particular needs of some people in these groups warrant targeted government intervention. The groups most likely to experience difficulties include: people with disability and life threatening conditions; Indigenous people living in remote settlements; some older people; people with no fixed address; and a small number of users of emergency services within the NBN satellite footprint"

2.0 Potential future process of distribution of TTYs.

As stated in our previous submission, if all Telecommunications Network Providers are in the future excluded from the USO in favour of an independent authority; PCT is equally able to continue to contract to such other parties be it direct to the Department of Communications or other independent body such as the former independent contracting body TUSMA.

Our only additional point is to state that any such change must be made seamless and hidden to TTY users, for reasons already made clear. Our preference therefore, is to keep the provision of TTY services as a partnership with Telstra in conjunction with the NRS since this would involve the least interruption to work practices and systems that are inevitable if there is a change in structure.

3.0 Depth of market

The Commission's Draft Recommendation 8.1 states:

The Australian Government should use competitive tendering wherever feasible to deliver telecommunications universal service programs. As a first step, the Government should test the depth of relevant market segments. Where there is no market depth and a competitive tendering process is not feasible, the Government should, at a minimum, subject all proposed program costings to an independent and transparent validation process. Where relevant performance comparators are available across programs, these should be used as a basis for benchmarking.

PCT agrees with this recommendation, and simply wants to table the fact that as the only provider of TTY equipment and services in Australia, we are in the situation where there is no market depth. As such, we are completely open to a review of program costings, but our only concern with this recommendation as stated is that the potential cost of referral to an independent body for validation could outweigh the current cost of the entire TTY program. Obviously, this is not our decision to make; we merely raise this concern in the public interest.

Summary

Printacall Communications Technology thanks the Productivity Commission for its diligent and comprehensive review of the Telecommunications Universal Service Obligation. It is clear how much consideration has already been made to all of the submissions thus far and when it comes to the area of universal accessibility of services for people of disability, we are in broad agreement. We congratulate the Commission and look forward to seeing your final report.

R. Power

Printacall Communications Technology

20th January 2016

Australian Productivity Commission