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# TELSTRA SUBMISSION

## PRODUCTIVITY COMMISSION PUBLIC INQUIRY INTO LONG-TERM DISABILITY CARE AND SUPPORT

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# 1. INTRODUCTION

Telstra welcomes this opportunity to provide input to the Productivity Commission's Public Inquiry into a Long-Term Disability Care and Support scheme. As the major provider of telecommunications disability equipment in Australia, Telstra has considerable interest in this study and the opportunity it presents to improve social inclusion for people with disability through improved access to telecommunications products and services.

Telstra has been providing specific products and services to people with disability since the early 1980s (cf. Attachment A: Major Achievements: Telstra Disability Services, 1981 to present). We have regularly engaged with representatives from the sector in a formal structured way since 1988. In 1996 Telstra was the first major corporate in Australia to publish a Disability Action Plan (DAP). Since then, we have implemented three more DAPs, all of which have been independently reviewed, registered with the Australian Human Rights Commission (AHRC) and published on Telstra's web site.[1] We are now in the development stage of our fifth DAP 2010-12.

Telstra maintains a dedicated Disability Enquiry Hotline (DEH) that is contactable by voice, email, TTY and facsimile to provide information and advice on disability products and services. We also have a dedicated Disability Services Manager who coordinates a wide range of programs across the company serving people with disability.

Due to these programs, Telstra has built up substantial knowledge and experience on the accessibility and affordability of modern communications products and services for people with disability. We have also established long-term relationships with a large number of customers and stakeholders with disability in Australia. We have designed and developed specific equipment based on user and stakeholder input, such as our standard home phone with improved universal design features, including volume control; our Big Button Multipurpose home phone; and our EasyTouch™ Discovery mobile handset, all of which have improved accessibility features. We have also built up considerable experience in efficiently distributing these products and services to customers right across Australia, again through relationships with specialist equipment suppliers and community referral points such as Independent Living Centres.

Our commitment to this sector is also evidenced by our establishment in 2009 of the Telstra-*Telecommunications Journal of Australia* Christopher Newell Prize for Telecommunications and Disability. The first award was made in May 2010 for work being undertaken to improve accessibility for people with disability to rich immersive online environments such as *Second Life*. We are currently working on new initiatives to improve the public provision of information about accessible telecommunications and to develop software applications to improve accessibility on mobile devices.

Access to modern communication services is fundamental to the National Disability Strategy, which is meant to "support people with disabilities so that they can engage with their community, get a job where possible, and live a happy and meaningful life" (Sherry, Rudd, Macklin and Shorten 2009). However, Telstra is concerned that the availability and affordability of this access is often overlooked in social policy discussions about modern communications services. This may be due to the perceived familiarity with and ubiquity of such services in our society, despite the substantial and intentional efforts and investments required to provide such access, particularly for people with severe or profound disability.

> Simply changing attitudes towards disability is not enough to promote a community that is inclusive of all. This must be accompanied by … telecommunications that are designed to increase the contribution of people with disability to the economy as customers and users of technology (South Australian Social Inclusion Board 2010).

## 1.1. ABOUT THIS SUBMISSION

Telstra supports the introduction of a Long-Term Disability Care and Support scheme in Australia as matter of social equity. Such a scheme should enable a comprehensive

[1] www.telstra.com.au/abouttelstra/commitments/disability-services/action-plan-history/index.htm

response to issues of availability, accessibility and affordability of essential services, including communications services. This would help to enable early participation in education, employment and life-style opportunities for people with disability.

This submission focuses on communications services for people with disability. While basic safety-net services, such as access to the Standard Telephone Service (STS), are already provided through mechanisms such as the Universal Service Obligation (USO), there is no doubt that innovative mobile devices and internet services are creating many more opportunities for social inclusion.

We argue that a Long-Term Disability Care and Support scheme is needed in order to facilitate access to the wider range of communications options available in the market, and to ensure access to localised bespoke solutions which may empower people with disability in their daily lives.

Such a scheme will also provide incentive for greater innovation in the provision of communications equipment and services to people with disability, and thus lead to a better-functioning market. This, in turn, will enable people with disability to fully realise their potential to the betterment of the wider economy and society.

# 2. SUMMARY OF RECOMMENDATIONS

**Recommendation 1. Access to appropriate telecommunications services be identified as a "core formal service" eligible for funding under a Long-Term Disability Care and Support scheme.**

**Recommendation 2. Future Australian taxation reviews, including the follow-up to the Henry review, should consider the extension of the preferential tax treatment of purpose-built disability equipment (including under the GST) to all equipment specifically supplied to provide communications access for people with disability.**

**Recommendation 3. Research and development of appropriate localised telecommunications solutions, including software applications, be eligible for funding under a Long-Term Disability Care and Support scheme.**

**Recommendation 4. Equipment, applications and services to enable people with disability to fully participate in online social networks, particularly immersive online communities, be eligible for funding under a Long-Term Disability Care and Support scheme.**

**Recommendation 5. Access to bespoke communications solutions through specialist service providers such as Independent Living Centre (ILC), Novita and Technical Aid to the Disabled (TAD) be included under any Long-Term Disability Care and Support scheme in cases of severe, profound or complex disability.**

# 3. SOCIAL INCLUSION THROUGH COMMUNICATIONS ACCESS

A recent literature review, commissioned by the Low Income Measures Assessment Committee, of *Telecommunications and Community Wellbeing* found:

> there is considerable evidence of economic and social benefits to individual and community wellbeing from access to new forms of telecommunications, even if there may also be some potential disadvantages. These benefits can accrue not only to the user population as a whole, but also specifically to lower-income or more disadvantaged groups if they can access and afford the technologies. (Eardley & Goggin 2009)

Examples of this abound:

- Mobile phones, particularly those with GPS capability, give greater confidence and opportunity for out-and-about mobility by people with disability.

- Online social networking sites, including immersive sites such as *Second Life,* provide places for isolated people with disability to form new communities and supportive relationships.
- Mobile phones with 3G video-calling capability and freely available programs such as *Skype* provide opportunities for people who are Deaf to have conversations in AUSLAN.
- Broadband internet access provides work-from-home opportunities for people who face mobility or social anxiety barriers, for example, to access paid employment and being able to participate more fully in society.
- Telstra supports the MyGlucoseHealth system, which facilitates the monitoring, recording and management of blood sugar levels for those suffering from Diabetes. It uses a combination of mobile phone and Internet technologies to provide real-time access to information for the customer, their general practitioner and key carers.

The European COST219ter project canvasses a wide range of examples where modern Information and Communications Technologies (ICTs) might be able to support people with disability in their daily lives, both in the home and out-and-about (cf. *Making life easier: How new telecommunications services could benefit people with disabilities* and *Towards an inclusive future: Impact and wider potential of information and communication technologies)*.[2] Many, if not all, of these examples clearly evidence social inclusion benefits through a reduction in isolation and an increase in participation.

It is clear that telecommunications access is fundamental to improving social inclusion, therefore we concur with others that it is important for any Long-Term Disability Care and Support scheme to recognise:

> …that affordable access to communication services and information technologies enables economic participation and promotes inclusive communities as well as assisting people to live independently. (ACCAN 2010)

In order to maximise these benefits for people with disability, Telstra submits that the overarching framework for the supply and maintenance of telecommunications disability equipment in Australia should be the Government's National Disability Strategy. This Strategy recognises "the need for a new whole-of-government, whole-of-life approach to disability issues which tackles the social and economic divide between people with disability and those without." (FaHCSIA 2008)

Greater benefits will accrue to people with disability if ICTs are "mainstreamed" into general service provision rather than made subject to separate telecommunications industry specific programs. This happens to some extent already. For example, Independent Living Centres already display a range of accessible communications equipment. Vision Australia already provide a range of technological aids for people who are blind. However, there are many gaps that could be covered if all Government (funded) programs that provide services to people with disability were a conduit for the provision of appropriate communications technologies for their clients.

A social inclusion model for the provision of telecommunications disability equipment has a number of advantages:

- It integrates ICTs into supporting people with disability in their lives, including better access to education, employment, health care, information and advice. In addition, it promotes a greater sense of connection to the community and therefore general wellbeing through the engagement that modern ICTs enable.
- It does not confine or limit the type of ICT equipment or service that can be made available to suit a person's particular needs. It can make use of new technologies and market offerings as soon as they are reasonably available.
- It provides a national market with multiple channels, which will potentially increase the number of providers of such equipment due to the greater incentive to innovate to meet customer demand.

[2] http://www.tiresias.org/cost219ter/pubs.htm, accessed 28 July 2010.

- By integrating ICTs within existing programs and services for people with disability, the barriers of information and awareness will be more effectively addressed at the point of need. This is key to resolving many of the issues faced by people with disability in finding, acquiring, using and maintaining relevant telecommunications products and services. For example, Novita has identified "lack of access to good information and available solutions" as a high priority issue for people with Complex Communications Needs (CCN).[3]

## 3.1. COMMUNICATIONS AS A "CORE FORMAL SERVICE"

The Issues Paper identifies the following groups of "core formal services required for a well functioning disability care and support system":

> personal care services, respite and accommodation services, community access, community support, income support, employment, transport, aids and appliances, home modification, but also a range of intangible services, such as counselling and mentoring (Productivity Commission 2010, p. 25).

Many of these services are directed towards enabling or improving social participation and inclusion for people with disability. However, as noted above, a fundamental contributor to such participation is affordable access to, and skilled usage of, modern ICTs or "digital inclusion" for short. We submit that this requires specific consideration under a National Disability Long-term Care and Support scheme, which has the opportunity to provide a comprehensive, national policy approach. Such a comprehensive approach has been discussed since at least 2003, but is still lacking.

> Despite identification of the issues, a systematic approach to affordability and disability has not been forthcoming, especially in relation to new technologies such as mobiles and internet of demonstrable benefit to people with disabilities. This was a finding of Jolley's 2003 study: 'In developing strategies to spread the benefits of mobile telephony throughout Australia the government has focused on geographical access, and has not explicitly addressed affordability for people on low incomes and accessibility for people with disabilities' (p. 16). While some action has been taken since this time, notably through the Telstra Disability Equipment Program, billing and credit management options, and the efforts of LIMAC, a comprehensive policy is still needed. (Eardley & Goggin 2009, p. 23)

For example, we note that telecommunications solutions for people with severe or profound disability are not comprehensively catered for at present, with no national consistent program but rather ad-hoc funding that depends on the state or region you live in and often based on the voluntary efforts of interested engineers, technicians and their organisations.

**Recommendation 1. Access to appropriate telecommunications services be identified as a "core formal service" eligible for funding under a Long-Term Disability Care and Support scheme.**

[3] Rob Garrett, Report on recent CCN-Telecommunications Activities at Novita, 25 February 2010.

# 4. FRAMEWORK FOR HOW COMMUNICATIONS SERVICES ARE PROVIDED

In the provision of communications services to people with disability a number of policy distinctions can be made. These are summarised in the following table.

| Social policy | Safety-net | Social inclusion |
|---|---|---|
| **Communications services** | STS, including voice equivalent for people who are deaf, deaf-blind or have speech impairment<br>Access to an emergency services answering point | Mobile phones for voice, text, video communication; Internet access, including for video communication, and with screen reading software for blind; smart-phones; tablets and netbook computers; social networking services and online communities |
| **Consumer protections** | Availability and accessibility | Affordability |
| **Delivery mechanism** | Regulation<br>eg. *Telecommunications (Consumer Protection and Service Standards) Act* 1999 (Cth), *Disability Discrimination Act* 1992 (Cth) | Market |
| **Funding** | Industry<br>eg. Disability Equipment Programs, National Relay Service, 106 text emergency service answering point, USO | Government<br>eg. Telephone Allowance/Pensioner Supplement; direct funding of specialist service providers |
| **Possible Gaps** | SMS access to Emergency Services | Video-relay AUSLAN translation service Deaf Australians |

## 4.1. SAFETY-NET AND SOCIAL INCLUSION

A distinction should be made between basic safety-net communications services and the broader range of additional communications options now available. This distinction is based on consideration of what makes basic communications possible for people with disability where it is not otherwise possible. For example, TTYs for people who are deaf or have severe/profound hearing or speech impairment make communications possible either directly or via the National Relay Service. Telecommunications service providers are obligated to provide disability access where they provide a STS, with Telstra providing universal access under the USO. Service providers are also required to comply with the *Disability Discrimination Act* 1992.

Additional, more advanced communication features and services are now available using a range of devices. These services can improve social inclusion beyond the safety-net service. A Long-Term Disability Care and Support scheme that is intended to support social/digital inclusion should therefore support access for people with disability to these additional services.

## 4.2. ACCESSIBILITY AND AFFORDABILITY

Accessible technology is generally available in the market, however, the actual issue may be the cost of acquisition of that technology for a person on a low income, which may include people with disability. Communications devices and services such as mobiles, desktop computers, laptops and internet access are in the main available at the same or similar cost to all Australians. Therefore, affordability, user education and skills are the key issues applicable for all Australians on a low income, including people with disability. Programs such as the Higher Rate Government Telephone Allowance/Pensioner Supplement support people on a low income to access these opportunities.

Telstra notes a significantly higher proportion of people with disability is dependent on Government income support and/or has lower income than the population in general (cf. Eardley & Goggin 2009, p. 25). This is still a significant factor in the lower take-up of additional communications services among people with disability. Affordability is a particularly relevant issue for this group, especially where *additional* equipment or services are required to enable accessibility, and where they only come at significant cost (eg. the cost of a PC or lap-top to enable use of internet based services).

A Long-Term Disability Care and Support scheme is therefore needed to provide the up-front access to required communications options that will enable people with disability to engage with education, health, employment and other services.

Telstra submits one solution to help make communications equipment more affordable for people with disability would be to extend the GST exemption currently provided on traditional devices to a wider range of services and devices. For example, while TTYs for people who are deaf or have severe/profound hearing or speech impairment are exempt from GST, an Apple iPhone with VoiceOver for a blind user is not exempt, even though it is at this stage the most accessible mobile handset for those users.

**Recommendation 2. Future Australian taxation reviews, including the follow-up to the Henry review, should consider the extension of the preferential tax treatment of purpose-built disability equipment (including under the GST) to all equipment specifically supplied to provide communications access for people with disability.**

## 4.3. MARKET PROVIDED AND REGULATED SERVICES

A distinction can be made between safety-net communications services, the provision of which is heavily regulated in Australia, in particular through the *Telecommunications (Consumer Protection and Service Standards) Act* 1999 and new services, such as mobiles and internet, which exist in a very dynamic and competitive market and are much less regulated. It is clear that consumer preferences are moving rapidly away from the old style fixed services to new innovative mobile devices that offer a wide variety of communications options. Because of intense competition and innovation in the mobile and Internet service provider markets these new technologies are now available to most Australians on a reasonable basis.

## 4.4. CUSTOMER AND TAX-PAYER FUNDED

At present telecommunications safety-net services are funded by the telecommunications industry, which recoups the costs from their customers. Telstra notes that this is different to other utilities, where Government provides concessions to people on a low income to maintain affordable access or where Government funds workplace adjustment schemes and other disability aids. Telstra also notes that the new communications services such as mobile phones and Internet access are subsidised through Government concessions only. Telstra submits that in a multi-service/multi-product environment provision of all telecommunications disability equipment, including that needed for safety-net services, should be available as part of the National Disability Strategy, and in particular, through any Long-Term Disability Care and Support scheme.

# 5. IDENTIFYING GAPS IN SERVICE PROVISION

## 5.1. MARKET DEVELOPMENTS IMPROVING ACCESSIBILITY

Australia is generally well-served in the competitive and commercial provision of telecommunications products and services. We note that consumer submissions often do not recognise the high levels of take-up of communications services in Australia. For example, landlines reached a high-point of approximately 95% of all households in Australia before mobile substitution began to set in; and mobile phone take-up is now at similarly high levels. Internet take-up or access is estimated at 7.5 million household subscribers at the end of December 2009 (ABS 8153.0) or 72% of households during 2008-09 (ABS 8146.0) with 90% of those being broadband access.

There has been recent and rapid improvement in mobile phone and internet affordability due to a maturing of those markets forcing providers to compete more on price and to bundle services together as a package. The rapidly growing area of wireless broadband over 3G networks has also provided another affordable internet access option. Specific examples are:

- The ubiquity of mobile handset purchase subsidies and/or repayment plans, which often provide for "zero upfront" plans that reduce barriers to ownership. For example, the Telstra EasyTouch™ Discovery II, which has a large number of accessibility design features, is available for $0 upfront on a $20 per month plan over 24 months. This phone has been one of Telstra's most successful mobile handsets to date. Even the Apple iPhone 3GS, with its included VoiceOver screen reader and zoom text features, and now arguably the handset of choice for people who are blind or have vision impairment, is now available from Telstra for $0 upfront cost on a low-entry $49 cap plan (which includes $400 of standard voice and video calls, text and MMS to any Australian network plus 200MB of data) on a 24 month contract.
- Pre-paid handsets are also very popular and affordable. For example, the Telstra EasyCall™ mobile handset has a number of accessibility features, including a large, separate emergency contact switch, and is priced at $59 outright including a $10 starter kit. The very popular Nokia 6120 Classic, also with a number of accessibility features and options such as SMS text to voice, is now available for $99 outright as a pre-paid offer.
- Broadband Internet prices have also become more affordable, particularly when combined with other communications/entertainment services. For example, Telstra's entry level broadband plan can cost as little as $9.95 per month with such a package arrangement.
- Wireless Broadband has now become a very popular and affordable option either on a plan or pre-paid. Telstra's entry level plan can cost as little as $9.95 per month, as part of a package of services.
- Telstra Next G mobile capped plans, in addition to voice and video calls, text and MMS to any Australian network, also include a data download allowance (eg. 200MB of included mobile data on a $49 Plan, and 500MB on a $79 Plan).
- PC screen reading software is becoming available through the not for profit community organisation NV Access, who provide the free and open source NVDA (NonVisual Desktop Access) screen reader for the Microsoft Windows operating system.
- The advent of smart-phones and devices such as the Apple iPhone and iPad bring together a range of communications services that you can take with you and utilise while out-and-about. Options for text, video and voice plus instant access to social media services open up new opportunities for, as well as bring down the cost of, communications.

Australia has an ageing population profile and service providers will adjust their products and services to suit this expanding market. For example, Telstra in the last few years has introduced:

- a new standard rental phone (T1000S), incorporating a number of accessible features for people with disability;
- a Big Button Multipurpose Phone, which has a long list of accessibility features to address the needs of older people, but also for people with severe or profound disability through the provision of ancillary switch activation and call connect services;
- the EasyTouch™ Discovery, which has a long list of accessibility features to address the needs of older people; and
- the EasyCall™ entry level pre-paid handset, which has improved accessibility features.

What all this evidence indicates is that the telecommunications market in Australia is offering a wide variety of communications options on a commercial basis, which have achieved almost saturation take-up. However, we recognise that people with disability face a range of barriers, including affordability, in accessing some options.

## 5.2. TECHNOLOGY DRIVING INNOVATIVE ACCESSIBILITY APPLICATIONS

The increasing move to Internet Protocol (IP) based networks and software based communications devices such as smart phones has resulted in greater in-market solutions to accessibility requirements for people with disability. For example, the in-built "Voiceover" feature of the Apple iPhone 3GS/4 has made this the handset of choice for people who are Blind. The Proloquo2Go application for the Apple iPhone, iPod Touch and iPad "provides a full-featured augmentative and alternative communication solution for people who have difficulty speaking." Rather than have a separate dedicated text to speech device, the phone becomes a multi-purpose communications centre.

We have already recommended that access to these technologies, where appropriate, be made possible under a National Disability Long-Term Care and Support scheme. However, in certain cases appropriate applications may not yet exist, or it may be more efficient to develop local solutions for people with complex communications needs. Collaboration between the scheme, researchers, service providers and applications developers should be encouraged in order to provide solutions at the lowest possible cost to people with disability in Australia.

**Recommendation 3. Research and development of appropriate localised telecommunications solutions, including software applications, be eligible for funding under a Long-Term Disability Care and Support scheme.**

## 5.3. SOCIAL INCLUSION AND ONLINE WORLDS

The increasing sophistication of online virtual environments has provided opportunities for people with disability to engage with peers and others from around the world in ways that transcend certain physical and social limitations.

> There are a large number of groups in Second Life that provide opportunities for people who identify as disabled, or who have an interest in disability, to socialise, share information or receive support services. For example, *Virtual Ability Island* assists people with disabilities to come into *Second Life* and helps to sustain them in the virtual world through the provision of support services. *Virtual Ability* is also a collaborative partner in the another virtual community, the *Health Support Coalition*, enabling more than 70 health and disability related virtual communities in *Second Life* to communicate through their group leaders. The *GimpGirl* virtual community was established outside *Second Life* in 1998 by Jen Cole and a group of young women with disabilities who were seeking a community that understood their needs and provided a safe place for women and girls with disabilities. The community conducts regular meetings and seminars in world and has a strong Web 2.0 presence as well. (Wood 2010)

Provision of such online access faces two hurdles.

- The first is the accessibility of the computer interface, which requires investment in research and development of appropriate technical/IT solutions.

- The second is the typically higher bandwidth/data requirements for intensive use of applications like *Second Life*. This may require higher-level data plans and thus impact on affordability for those low-income people with disability who stand to gain significant inclusion benefits from participating in immersive online communities.

**Recommendation 4. Equipment, applications and services to enable people with disability to fully participate in online social networks, particularly immersive online communities, be eligible for funding under a Long-Term Disability Care and Support scheme.**

## 5.4. BESPOKE TELECOMMUNICATIONS SOLUTIONS FOR PEOPLE WITH SEVERE, PROFOUND OR COMPLEX DISABILITY

While Disability Equipment Programs cover the vast majority of requirements for access to a STS for people with disability, they may not be able to cover the unique requirements of people with severe, profound or complex disability. This may require the development of bespoke solutions that involve adjustments that lie outside the telecommunications domain. For example:

> When you are using communication aids and devices to communicate, the positioning of your body in relation to the device can make the difference. Novita are involved in the design and manufacture of headrests, arm supports and leg guides to enable access to communication switches. (Novita 2010)

Telstra is aware that organisations such as ILC, Novita and TAD undertake such specialist modification activity to provide a telecommunications solution where required, in the cases of severe, profound or complex disability. Any disability long-term care and support program should enable access to specialist centres that can provide such solutions.

**Recommendation 5. Access to bespoke communications solutions through specialist service providers such as Independent Living Centre (ILC), Novita and Technical Aid to the Disabled (TAD) be included under any Long-Term Disability Care and Support scheme in cases of severe, profound or complex disability.**

# 6. ELIGIBILITY AND IMPLEMENTATION

Telstra's Disability Equipment Program has in the past included eligibility criteria with verification by a health professional as part of the application process for all specialised equipment. However, more recently, this has been relaxed for most items that are generally available in-market resulting in less paper-work, much faster fulfilment and resulting improvements in customer satisfaction. However, high-cost equipment that has to be specially sourced is still subject to application, eligibility and verification.

This model, of distinguishing between general in-market items and specially sourced items, might be useful for a Long-Term Disability Care and Support scheme to consider. The former items (eg. affordable to people on average incomes) could be made available to members of the scheme as a matter of course, the latter (more expensive or potentially one-off items) may need some assessment as they are likely to only be available from specialist providers. There may be opportunity for Government through its procurement programs to obtain economies of scale and so bring down the costs of these specialised items for people with disability.

There may be a further role for Government internal procurement programs to send signals to the market in regard to accessible communications equipment. For example, enterprise telephony and mobile telephony handset manufacturers, PC and mobile operating system developers, and applications developers may all respond to enhanced accessibility requirements where there is a commercial incentive through large contracts.

To the greatest extent possible, people with disability should be able to exercise choice with the former in-market items so that their preferred communications options are catered for. This would be consistent with an individualised funding model where the

member of the scheme, in consultation and with relevant advice, is able to prioritise and choose the most advantageous options for their individual circumstances and life-style.

Further, due to the rapidly changing nature of communications technology, where new handset models and software developments are emerging almost weekly, we do not believe it is appropriate to prescribe lists or schemes of approved equipment, which may date very quickly. Telstra is currently supporting a Web 2.0 project to pilot an approach to information provision about telecommunications solutions and people with disability where it is hoped users can share with others their experiences of what works for them, which we believe is a better approach.[4]

# 7. CONCLUSION

Making sure that people with disability have equal access to information, communications and other services, including electronic services like the internet and emergency services is a commitment in principle Australia has made under the United Nations Convention on the Rights of Persons with Disabilities (cf. Article 9.1.b, 9.2.g and 9.2.h). This commitment in principle already recognises that telecommunications is an important enabler to improve digital/social inclusion for people with disability.

While basic safety-net services are well established through regulatory mechanisms such as the STS, USO, NRS, 106 TTY/text emergency service answering point, and Telstra's DEP, which is available to customers of other fixed line service providers via a wholesale arrangement, the telecommunications market in Australia offers a much wider range of available, accessible and affordable communications options and opportunities.

A properly instituted Long-Term Disability Care and Support scheme would provide a nationally consistent mechanism to ensure that people with disability are able to access and maximise the benefits of such technologies as a "core formal service" to support employment, education, mobility, health, independence, self-determination, a sense of connectedness and overall wellbeing.

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[4] A community based website/wiki that empowers individuals with Complex Communication Needs (CCN) or Severe Communication Impairments (SCI), as well as support organisations, to share information on available telecommunications solutions and to receive direction to known applicable resources, a project by Novita Children's Services, Australian Communications Exchange, Australian Communications Consumer Action Network, Telstra and others.

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# 9. DEFINITIONS

| TERM | DEFINITION |
|---|---|
| ABS | Australian Bureau of Statistics |
| ACCAN | Australian Communications Consumer Action Network |
| AHRC | Australian Human Rights Commission |
| DAP | Disability Action Plan |
| DBCDE | Federal Department of Broadband, Communications and the Digital Economy |
| DEH | (Telstra's) Disability Enquiry Hotline |
| FaHCSIA | Federal Department of Families, Housing, Community Services and Indigenous Affairs |
| GPS | Global Positioning System |
| ICT | Information and Communication Technology |
| ILC | Independent Living Centre |
| NRS | National Relay Service |
| STS | Standard Telephone Service |
| TAD | Technical Aid to the Disabled |
| TTY | Teletypewriter |
| USO | Universal Service Obligation |
| VRS | Video Relay Service |

# 10. ATTACHMENTS

| DOCUMENT | TITLE |
|---|---|
| A. | Major Achievements: Telstra Disability Services, 1981 to present |
| B. | Telstra Corporation Limited, Submission to DBCDE, "Feasibility Study into an Independent Disability Equipment Program", 17 April 2009 |

# 11. FOR FURTHER INFORMATION

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# ATTACHMENT A.
# MAJOR ACHIEVEMENTS: TELSTRA DISABILITY SERVICES

**2010**

- An independent review of Telstra's 4th Disability Action plan 2007-2009 found that 33 of 42 items in the Plan were complete or on-going with high achievement; there was extensive progress on 4 items; with 5 items still in progress
- Telstra begins developing its 5th Disability Action Plan to now bring together actions relating to Our Customers, Our Community and Our People
- Telstra EasyCall™ low-cost pre-paid mobile phone launched with a host of accessible features
- Dr Denise Wood, University of SA, awarded the 2010 Telstra-*TJA* Christopher Newell Prize for Telecommunications and Disability for her paper, "Communicating in Virtual Worlds through an Accessible Web 2.0 Solution." Telstra announces it will also sponsor the prize in 2011.

**2009**

- Launch of the $20 000 Telstra-*TJA* Christopher Newell Prize for Telecommunications and Disability, awarded for the best original paper offered for publication by the *Telecommunications Journal of Australia* that demonstrates the tangible benefits that an innovative use of telecommunications technology can deliver in assisting individuals with disabilities
- Telstra launches the EasyTouch® Discovery II mobile handset on the Next G™ network, developed for and with input from older people and people with disability

**2008**

- 20th meeting of Telstra Disability Forum and Disability Equipment Program Consumer Advisory Group held
- Telstra launches Next G™ network EasyTouch® Discovery mobile handset, developed for and with input from older people and people with disability

**2007**

- Telstra launches its Fourth Disability Action Plan 2007-09
- The application process for most Telstra Disability Equipment Program products improved so most eligible customers no longer need to complete an application form, leading to faster delivery of products and an improved customer experience
- Testing of Telstra Next G™ mobile phones by National Acoustics Laboratories and customers finds that people with hearing aids and cochlear implants can successfully use 3G mobile phones without an assistive device in almost all situations

**2006**

- Disability Services included into Telstra Compliance and Corporate Ethics Framework
- Telstra Diversity Council Taskforce for Disability established

**2005**

- An independent review of Telstra's Third Disability Action Plan 2002-04 found that 92 per cent of the actions were complete and eight per cent rated extensive progress
- Telstra was principal sponsor of the 20th Deaflympic games, held in Melbourne
- A Big Button Multipurpose phone, developed in consultation with the Telstra Disability Equipment Program Consumer Advisory Group, was added to the Telstra Disability Equipment Program

- Telstra Disability Forum Payphones Working Group develops a draft Payphones Industry Code

**2004**

- Disability Awareness online training made mandatory for Telstra employees with customer contact
- Telstra takes up first year of three year major sponsorship of NSW “Don’t DIS My ABILITY” campaign held on 3 December, centred around International Day of People with a Disability
- Cordless phone added to Telstra Disability Equipment Program

**2003**

- Telstra wins PM Employer of the Year Award for Leadership in Disability
- Telstra Wholesale Disability Equipment Program launched
- Telstra establishes 47 Telstra Country Wide offices and specialised community agencies to display Telstra disability equipment
- Telstra launches a new standard rental phone (T1000S), incorporating a number of accessible features for people with disability, including volume control
- Braille teletypewriter (TTY) and Large Visual Display TTY introduced into Telstra’s Disability Equipment Program
- Fault reporting procedure introduced specifically for TTYs
- TTY Payphone locations and catalogue of products and services for older people and people with a disability published online

**2002**

- Telstra launches its third Disability Action Plan 2002-2004
- Telstra makes commitments to people with Intellectual Disability

**2001**

- Launch of online Disability Awareness leaning program for Telstra staff
- Launch of Telstra’s Centre for Accessibility

**2000**

- Catalogue of products and services for older people and people with a disability released
- Telstra Disability Equipment Program Consumer Advisory Group established
- Telstra Paralympic Employment Program established
- Telstra wins the Supertext “Advertiser of the Year” award

**1999**

- Release of second Telstra Disability Action Plan 1999-2001
- Telstra Disability Forum established
- 100th TTY Payphone installed
- Captioned video in AUSLAN on Telstra’s Disability Equipment Program released

**1998**

- Telstra’s Disability Equipment Program expanded to include Teletypewriters (TTYs)
- Introduction of the Telstra Braille Bill

**1997**

- Centralised Disability Enquiry Hotline established
- Staff Disability Awareness program established

**1996**

- Release of Telstra's first Disability Action Plan 1996-98, a landmark for the business community in Australia.

**1993**

- Introduction of Payphone Access Policy to improve accessibility to Telstra payphones

**1989**

- Telstra Consumer Consultative Councils established, including a Disability Services Consultative Committee

**1988**

- Disabilities Program Unit established
- Telstra Aged and Disability Centres established in each state capital city
- Telstra Credit Management Working Group established

**1981**

- Specialised products to assist people with a disability to use the standard telephone introduced ■

# ATTACHMENT B.
# TELSTRA CORPORATION LIMITED, SUBMISSION TO DBCDE, "FEASIBILITY STUDY INTO AN INDEPENDENT DISABILITY EQUIPMENT PROGRAM", 17 APRIL 2009

[See separate file.]