

26 February 2001

Mr Jim Roberts
Inquiry Research Manager
Productivity Commission
email: jroberts@pc.gov.au

Dear Mr Roberts,

Subject: Submission from ACE re Disability equipment

Australian Communication Exchange (ACE) has prepared a discussion paper outlining issues relating to the distribution of telecommunications equipment for people with a disability. This paper is a synthesis of matters and concerns expressed by telecommunications companies and consumers alike, and attempts to find a constructive solution to a complex problem. ACE believes this paper addresses issues within the current brief of the Commission, and therefore offer this discussion paper as a submission to the Commission.

The matters raised within our submission are of public interest and not commercially sensitive, and we would welcome the opportunity to offer it for open discussion. I understand you already have a soft copy of the paper.

Should you require further information, elaboration or clarification, do not hesitate to contact me. We look forward to a positive outcome from the activities of the Commission.

Sincerely

Len Bytheway

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DISCUSSION PAPER

Disability Equipment Program

Prepared February 2001
Len Bytheway, Chief Executive Officer

SUMMARY

As a major national provider of communications access products and services for Australians with a disability, Australian Communication Exchange (ACE) has serious concerns regarding the existing provision of telecommunications access equipment to people with a disability. ACE is a community 'owned' not-for-profit organisation, which typically takes a consumer focussed view when assessing industry trends. In recent years ACE has collaborated with consumers, carriers and government to design and implement telecommunications equipment programs. ACE is therefore well positioned to appreciate the issue of equipment provision from a broad regulatory and industry perspective, while remaining mindful of consumer issues.

This discussion paper outlines some of the perceived weaknesses and shortcomings of the existing program/s, indicating the impact these programs have on the quality of service and access provided to people with a disability.

In essence, the benefits of choice and cost savings resulting from the deregulation of the telecommunications industry which are enjoyed by many Australians, are not being shared by people with a disability. Existing equipment program/s are not flexible enough to deal with the increasing complexity of the telecommunications environment. In fact, the quality of access and service for people with disabilities may have deteriorated as a result of industry changes.

ACE is of the opinion that the current equipment programs are an historic remnant of legislative and regulatory changes that have not adequately predicted the impact of deregulation for people with a disability. ACE does not seek to criticise the existing program/s, as they are simply a response to the current regulatory provisions, and seemed appropriate at the time.

ACE believes the time is right to review the current provisions of the *Disability Discrimination Act 1992*¹ (DDA) and the *Telecommunications (Consumer Protection and Service Standards) Act 1999*², particularly the Universal Service Obligation (USO), to devise and implement an effective and inclusive Disability

Telecommunications Equipment Program ('the Program'). ACE proposes that such a program should be extricated from the general USO and managed independently of Carriers, and Carriage Service Providers (CSPs) yet service the customers of all telecommunications service providers. ACE proposes a purpose-designed, cross-industry solution for all people with a disability.

The Program should offer a comprehensive range of equipment, and at the same time provide quality services and support to customers in metropolitan, as well as rural and remote areas. The Program should incorporate an 'end-to-end solution' for consumers, starting with awareness of the Program; through guided selection of the most appropriate equipment; equipment installation and training; and provision of support for customers via on-going assistance (e.g. in the form of training) and maintenance of equipment.

The proposed Program outlined below recognises and addresses the many complaints received by Carriers and CSPs, the Commonwealth, the TIO and by ACE regarding existing service offerings. The proposal responds to issues raised in the Telecommunications Services Inquiry, 2000 and it offers a proactive industry response to the genuine inequities in the current program/s offered to consumers with a disability.

While ACE is 'sponsoring' this discussion paper it is envisaged that this will become a seminal document to arouse interest, debate and hopefully consensus to achieve a 'world's best practice' Disability Telecommunications Equipment Program (DTEP).

BACKGROUND

For many years, Australians who require access to specialised telecommunications equipment to access the Standard Telephone Service have had to apply for the equipment.

The existing Disability Equipment Program (DEP) run by Telstra has evolved out of a number of precedent programs.

Historically, Telstra provided a selected range of products under its DEP prior to the introduction of the *Telecommunications Act 1997*³. The original Telstra DEP grew partly in response to consumer demands, and partly out of Telstra's social justice agenda.

The DEP was supplemented in 1995 by funding from the then Department of Human Services and Health, and Department of Communications and the Arts. The National Relay Service Telecommunications Equipment Access (NRS-TEA) Program was established to provide TTYs, modems and Telebrailles to financially disadvantaged people. ACE administered the NRS-TEA Program as part of the original National Relay Service contract.

Following the outcome of the 1995 Scott v Telstra⁴ case in the Human Rights and Equal Opportunity Commission (HREOC), Telstra contracted ACE in 1996 to provide the Telstra TTY program, to complement the NRS-TEA program. These combined programs offered a selected range of equipment for most Australians who are Deaf or have a speech or hearing impairment (within boundaries of certain degrees of severity). The NRS-TEA and Telstra TTY programs continued until June 1998.

In July 1998, the obligation to provide Standard Telephone Services and access equipment to people with disabilities fell under the Universal Service Regime within the *Telecommunications Act 1997*. At that time Telstra added a selected range of TTYs and modems to the range of products available under its Disability Equipment Program and therefore provided a single program for people with disabilities. In effect, the subsequent program now being provided by Telstra is simply a combination of the two previous programs.

The Universal Service Regime is now a part of the *Telecommunications (Consumer Protection and Service Standards) Act 1999*.

AUSTRALIA'S AGING POPULATION

In 1998 there were 2.3 million Australians over the age of 65 years or 12% of the population.

In 2006, the first of the baby-boomers will reach the age of 60 and for two decades following, the retirement rates will inflate to unprecedented levels. The Australian Bureau of Statistics projects that by 2051 the number of people in Australia over the age of 65 years could be approximately 6 million or around one quarter of the projected total population of Australia.

In 1999, 54% of people over 65 years of age had a disability⁵. Therefore, by 2051 there could be approximately 3.24 million people who are over 65 years and have a disability.

This means that there will be substantial future growth in the number of Australians that could require specialised customer equipment to access the Standard Telephone Service. This group has the potential to make a disability equipment program very large and expensive. Alternatively the telecommunications industry has the choice to review the whole situation and define what features are required on customer equipment used with the Standard Telephone Service.

WHAT IS HAPPENING CURRENTLY?

Australian Communications Industry Forum

The Australian Communications Industry Forum (ACIF) has developed and submitted *AS/ACIF S040: 1999 Requirements for General use Customer Equipment for use with the Standard Telephone Service*⁶ to the Australian Communications Authority (ACA) for approval. Under Section 380 of the *Telecommunications Act 1997*, the ACA has the ability to make a standard relating to customer equipment for use in connection with the Standard Telephone Service for people with a disability. AS/ACIF S040 currently specifies:

- A raised dot on the digit 5 to aid people with a visual impairment, and
- Hearing aid coupler to assist people who are hearing impaired and wear a hearing aid with a T-switch.

The Standard preserves the status quo as a large percentage of customer equipment available in Australia already complies with these requirements. When mainstream products are designed to incorporate the needs of people with a disability, the concept is known as 'Universal Design' (Appendix A).

It is interesting to note that in terms of accessibility, the majority of people who have a hearing impairment would not be able to take advantage of one of the requirements in AS/ACIF S040 ie. a telephone with a hearing aid coupler. Australian Hearing is the largest provider of hearing aids in Australia, and in its 2000 Annual Report⁷, stated that of the 85,351 hearing aids fitted in 1999/00 the majority (50,129 ie. approx. 60%) were in the ear or in the canal. These hearing aids would be unlikely to have a T switch fitted and therefore the individuals would not be able to take advantage of the hearing aid coupler in customer equipment. Furthermore, the South Australian Department of Human Services⁸ showed that one in five Australians over 15 have a significant hearing loss, and as many as one in two people over the age of 60 can expect to have trouble with their hearing. This is a significant market segment and not all of these individuals would choose to wear a hearing aid, and therefore may not be in a position to benefit from a hearing aid coupler in customer equipment.

The development of AS/ACIF S040 provided an opportunity for many Australians to benefit from some additional features on customer equipment following the concept of Universal Design. It looks like this opportunity may have been missed. Therefore the cost of providing customer equipment to Australians with a disability will need to be borne by the telecommunications industry through specialised equipment programs.

Telecommunications (Equipment for the Disabled) Regulations 1998

The *Telecommunications (Equipment for the Disabled) Regulations 1998*⁹ provides examples of customer equipment that could be supplied to people with a disability for use in connection with the Standard Telephone Service.

Disability Equipment Available from Telstra

Telstra is currently the only Carrier that provides a selected range of specialised equipment for people with a disability. It could be argued that Telstra is fulfilling the obligations of the whole telecommunications industry by default.

Even though Telstra is the Universal Service Provider, the costs of providing the DEP are apparently not included when calculating its Net Universal Service Cost.

To obtain disability equipment from Telstra, an individual must qualify based on the eligibility criteria and be a Telstra customer ie. obtain basic line access from and pay first telephone rental direct to Telstra.

The vast majority of Telstra customers requiring access to its Disability Equipment Program are individuals with a hearing loss who require a telephone with a volume control.

The Australian Communications Authority's *Telecommunications Performance Report 1999-00*¹⁰ states that Telstra does not record the number of applications for disability equipment received and approved. However the report states that manual extraction of records for the period January to June 2000 indicated an average of 1,000 approved applications per month over this period.

Also, Telstra reported to the ACA that it is unable to provide accurate details on disability related complaints, as these cannot be readily identified in its reporting system.

Disability Equipment Available from other Carriers and Carriage Service Providers

In early 2001, Cable and Wireless Optus (CWO) commenced a trial to issue a limited range of equipment to customers with a disability that subscribe directly to the Optus network for local calls.

Although all Carriers and Carriage Service Providers have a responsibility to provide equipment to people with a disability, ACE is aware of only one other Carrier, in addition to CWO, that has purchased and issued equipment directly to its customers.

How does the Customer make a Choice?

In general, a telecommunications consumer is able to survey the market, compare prices and plans and decide which of the telecommunication plans available best suits their needs and budgets. Since there is currently only one service provider that offers a selected range of products under a Disability Equipment Program, Australians with a disability are denied access to the benefits of the competitive market and service options.

ACE is aware of at least one case when a customer chose to select her telecommunications service based on price and other distinguishing features that appeared to be more attractive than other services. The customer later realised that she required disability equipment and was faced with the prospect of purchasing equipment without assistance from the Carrier or Carriage Service Provider. This situation is outlined in a letter to the *Productivity Commission – Review of Telecommunications Specific Competition Regulation*. A copy of the submission is attached as Appendix B. While a customer could pursue costs under the Disability Discrimination Act in this circumstance, such litigious action is not often taken.

In exercising her choice of CSP, the only reasonable option available to this customer was to consider purchasing a TTY (approx \$1,195) with a TTY Large Visual Display (approx \$595) plus the cost of a visual or vibrating alert to assist her son to see or feel the telephone ring.

The situation outlined above highlights one of many of the inadequacies existing in the telecommunications industry today in relation to the access, competition and choice of disability equipment. ACE believes the restrictions to customer choice and the limitations placed on consumers with a disability are seemingly contrary to the intent of the Universal Service Regime of the *Telecommunications (Consumer Protection and Service Standards) Act 1999*.

Do Australians have Access to a Comprehensive Range of Equipment?

In 2000 Telstra released a catalogue featuring Telstra products and services for older people and people with a disability.

ACE has the following concerns in relation to the range of equipment currently available in Australia for people with a disability:

- The telecommunications equipment required by the individual may be available in Australia and yet not be available from the Telstra Disability Equipment Program. A good example involves people who are Deaf and have a vision impairment. If those individuals need a TTY and a large visual display, then they must purchase the equipment from a local supplier at a cost of approx \$1,800. This equipment has been available in Australia for some time. It is not available under the Telstra DEP despite the possibility that it

could be, and often is, the only telecommunication option for those people who are Deaf, have a significant vision impairment and do not use braille.

- There may be no suitable telecommunications equipment available from the Telstra DEP to suit the needs of the individual. Suitable equipment may be available in other countries. Unless a supplier has a direct relationship with Telstra, there is little incentive for a company to import highly specialised telecommunications equipment for people with a disability. Competitive forces have been affected as Telstra has become 'the gatekeeper' for entry of this specialised equipment into Australia. The dilemma is that for a new access product to be introduced into Australia, Telstra must include it in their program, otherwise there is no significant market for its purchase (and no volume to recover the costs of compliance etc.) Since the product 'is not available in Australia' Telstra would not normally consider it as an item for inclusion in its program. The consequence may be that potentially important access products emerging on the world market are unlikely to find their way onto the Australian market (either under the Telstra program, or in general distribution). In its Disability Action Plan 1999-2001¹¹, Telstra does not include any strategies or actions to review or expand its product range and services for people with a disability.

Do Australians have Access to Training about How to use Disability Equipment?

People with a disability may not necessarily be familiar with how to use the equipment provided under the Telstra DEP. One of the findings of the *Telecommunications Services Inquiry 2000*¹² was many people with disabilities lack the awareness or training to make use of equipment or services available to meet their needs.

Recommendation 16 of the inquiry stated 'That a training program for users of teletypewriter (TTY) machines be incorporated in the National Relay Service.'

Adequate training on the use of all equipment would need to be considered when designing a future DTEP.

SOME ISSUES EMERGING FROM INCREASED COMPETITION

At a time when Telstra provided virtually all the Standard Telephone Services (STS) within Australia, the matter of disability equipment provision was relatively simple. With increasing competition, other carriage service providers became responsible for the STS, and therefore inherited responsibility for disability equipment provision. To offer a DEP, a CSP requires specialised skills and knowledge, a new level of organisational infrastructure and a different supply chain, all of which can amount to significant changes and costs for the CSP. As a result, CSPs have been slow to respond to this new responsibility.

Although the potential customer base requiring a DEP may be small for an emerging CSP, the costs involved in setting up and maintaining a highly specialised program may be particularly high, and outside the CSP's areas of core business and expertise. The operation of a DEP is not a profitable business activity for a CSP. The additional infrastructure and skilling costs required to meet the needs of people with a disability may pose an undue burden on a new entrant in the telecommunications field. The risk of litigation under the Disability Discrimination Act (DDA) is real, however may not be a strong enough incentive to force compliance. Yet if these carriers do not offer DEP, the full range of choices will not be available to a person with a disability.

It appears to ACE that there is a dilemma for both the consumer and the industry. Access to equipment from any and every carrier is essential in order for people with disabilities to reap the benefits of competition, yet smaller emerging carriers would be relatively less competitive if required to replicate a fully functional and equitable DEP.

There is also a major disincentive for carriers to offer a comprehensive, consumer responsive, high quality DEP. A carrier who offers a highly desirable and attractive program may attract more customers with a disability or specialised equipment needs. In so doing that company will shoulder a larger-than-market share of this social obligation (and therefore higher costs). This simple market factor would naturally drive carriers to offer services of a minimalistic nature. While many consumers could benefit from a DEP, it is in the financial interests of the carrier not to provide and actively promote such services.

Further, there exists a significant area of ambiguity as to who has the responsibility to offer equipment. A carriage service provider may purchase telephony services on a wholesale basis, add a 'brand' and then resell the service to a consumer. When this occurs there appears some dispute over who has the responsibility for the DEP. Clearly in such reseller situations, the margins are reduced to both supplier parties, although this should not be of concern to the customer.

DEP SERVICE STANDARDS

Currently there are no clear guidelines or standards, which direct the way in which a DEP is delivered. The lack of industry performance standards, reporting, monitoring and consumer input leaves interpretation of the responsibilities to each CSP. There are no clear guidelines on the responsibility of the provider to:

- source new access equipment;
- advertise the DEP; or
- train and support consumers.

ACE believes that these issues are basic considerations for an effective program to be put in place.

Under the current arrangements where no precise guidelines are offered, a prudent industry competitor would naturally be encouraged to offer service standards that are 'adequate', yet be driven by corporate directives to minimise costs. The dilemma of whether to focus on profits or focus on a community service will be more important for smaller players who are less able to afford expensive infrastructure required to offer services for a few customers.

ACE believes a future DEP should primarily be driven by Customer Service Standards defined by consumers in consultation with the industry and Australian Communications Authority (ACA). A DEP should also complement the high standard of the telecommunications industry in terms of efficiency, service delivery, cost-effectiveness and reporting. It is apparent that economies of scale and the removal of duplication would greatly assist the cost-effective delivery of service. ACE supports the development of enforceable performance standards through a process of consumer consultation.

RECOMMENDATIONS

Recommendation 1

In-keeping with the philosophy of Universal Design, Australian Communication Exchange recommends that *AS/ACIF S040: 1999 Requirements for General use Customer Equipment for use with the Standard Telephone Service* be modified to include features that will satisfy most of the needs of people in an aging population. Some of the features that could be considered in consultation with consumers include:

- a handset that amplifies the incoming caller's voice to suit the listener;
- an adjustable ringer pitch so that the tone of the bell can be adjusted to assist a person to hear the phone ring;
- large buttons for people with a vision impairment; and
- automatic dialling and switching functions for people with limited use of their hands and arms.

Recommendation 2

Australian Communication Exchange recommends that legislation be amended to enact a new program: i.e., the 'Disability Telecommunications Equipment Program' (DTEP) for the provision of access equipment for Australians with a disability who do not gain adequate access using the (enhanced) Standard Telephone Service customer equipment.

ACE envisages that the DTEP would:

- Offer a choice of equipment to any qualifying person, regardless of their chosen carriage service provider;
- Be funded through a levy on all Carriers and Carriage Service Providers based on a formula that accounts for their market share, rather than the number of consumers with a disability. This is the same formula and mechanism as that used to fund the National Relay Service (NRS);
- Be contracted by DoCITA on behalf of the Commonwealth and monitored by the Australian Communications Authority (as for the NRS);
- Be guided by advice from a consumer consultative panel on design, service standards and appropriate equipment for inclusion in the Program;
- Include the following activities by the provider:
 - Consumer awareness of the Program through appropriate avenues;
 - Assistance to ensure consumers receive equipment that best suits their needs through a process of 'informed consumer choice';
 - Assess the relevance and accessibility of emerging technologies to determine whether or not the new technologies could be provided by the DTEP;
 - Sourcing and procuring equipment from an appropriate range of suppliers based on consumer needs;
 - Delivery and installation of equipment (as required);
 - Training in the use of the equipment (as required);
 - Ongoing support for consumers and maintenance of equipment;
 - Maintaining records of applications, equipment issued and equipment histories;

- Monitoring customer satisfaction, including complaints;
- Referral to other relevant specialist telecommunications services for people with disabilities ie. National Relay Service;
- Service standards and auditing;
- Reporting to relevant bodies; and
- Reflect the world's best practice.

WHAT ARE THE POTENTIAL BENEFITS FOR CONSUMERS, INDUSTRY AND GOVERNMENT ?

Australian Communication Exchange proposes that all interested parties (ie. consumers, industry, ACA and DoCITA) discuss and agree on a DTEP model that offers the following benefits.

Carriers and Carriage Service Providers

The benefits to the Carriers and Carriage Service Providers include:

- Meeting their obligations under the Universal Service Regime of the *Telecommunications Act 1997*;
- Minimising their risk and the costs of responding to a complaint under the Disability Discrimination Act 1992;
- Access to a comprehensive and cost effective 'solution' to ensure all their customers gain suitable equipment to use their telecommunications products and services;
- Gaining direct access to a larger consumer market. Like any other Australian, people with a disability would need to choose a Carrier or CSP by surveying the market, comparing prices and plans and deciding which of the telecommunication plans available best suits their needs and budgets;
- Protection from additional costs associated with churning ie. when customers with a disability churn they will not need to return expensive specialised telecommunications equipment to the Carrier or CSP;

- The opportunity to focus on core business, without the need to incur the overheads and distractions associated with establishing and maintaining their own specialised disability program;
- Access to a consumer advisory group that will be able to offer expert guidance and decision making regarding on-going changes, introduction of new equipment and improvements to the program; and
- A fair, independent and transparent system that is monitored and audited by Australian Communications Authority.

Consumers

The benefits to consumers include:

- A superior selection of Standard Telephone Service customer equipment, meaning far fewer people need to explore the DTEP to use the phone;
- Satisfaction in the knowledge that emerging technologies are being assessed in terms of their suitability for people with a disability and their possible inclusion in the DTEP;
- Influence over the selection of equipment including the requirement, when appropriate, for the introduction of equipment that is not currently available in Australia;
- Real telecommunications choices comparable to those enjoyed by other Australians and access to the product offerings of all Carriage Service Providers;
- Choice from a comprehensive range of suitable equipment that can change over time;
- Removal of the need to have a representative on every Carrier and Carriage Service provider's disability advisory body in terms of the issue of telecommunications equipment for people with a disability;
- A centralised, high quality service focused on the needs of consumers;
- Consistency and continuity of specialised knowledge base;
- Service level standards; and
- A program that follows world's best practice.

Government and Regulators

The benefits to Government and the Regulators include:

- A responsive, single program that satisfies the needs of consumers;
- Removal of the need to report on the performance of every Carrier and Carriage Service provider in terms of the issue of telecommunications equipment for people with a disability;
- Access to a consumer advisory group that will be able to offer expert guidance and decision making regarding on-going changes, introduction of new equipment and improvements to the program;
- Moving towards a consensus model and away from the litigation model;
- Satisfaction from the industry when it is free to compete for consumers on a fair and equitable basis;
- Access to statistics eg. number of products issued, number of complaints, etc;
- A national administrative and management model with streamlined processes; and
- Facilitating a world's best practice model of service provision.

REFERENCES

¹ Disability Discrimination Act 1992

² Telecommunications (Consumer Protection and Service Standards) Act 1999

³ Telecommunications Act 1997

⁴ Geoffrey Scott v Telstra Corporation Limited and Disabled Persons International (Australia) Limited v Telstra Corporation Limited, Nos. H95/34, H95/51

<http://scaleplus.law.gov.au/html/ddadec/0/95/0/DD000060.htm>

Australian Association of the Deaf and Disabled People's International (Australia) Limited v Telstra Corporation Limited, Nos. H95/34, H95/51

<http://scaleplus.law.gov.au/html/ddadec/0/95/0/DD000050.htm>

⁵ Disability, Ageing and Carers: Summary of Findings, Australian Bureau of Statistics 1999

⁶ AS/ACIF S040: 1999 Requirements for General use Customer Equipment for use with the Standard Telephone Service

⁷ Australian Hearing 2000 Annual Report

⁸ Centre for Population Studies in Epidemiology, South Australian Department of Human Service, 1998, *Hearing Impairment in an Australian Population*

⁹ Telecommunications (Equipment for the Disabled) Regulations 1998

¹⁰ Australian Communications Authority, 2000, Telecommunications Performance Report 1999-00

¹¹ Telstra Disability Services, Telstra's Second Disability Action Plan 1999 – 2001

¹² Telecommunications Service Inquiry, 2000

<http://www.telinquiry.gov.au>

APPENDIX A

Before examining the provision of specialist telecommunications equipment for Australians with a disability, it is important to understand the concept of Universal Design.

Specialist equipment for people with a disability is not required when products, services and buildings are designed for all people in the community. If the concept of Universal Design (ie. access for everyone) is applied, then there is no need to retro-fit, fix or supplement the product, service or building with a specialist product, service or work.

The cost to provide access as a ‘after-thought’ is often unnecessarily expensive in comparison to what it would have cost if consideration for the needs of people with a disability had been incorporated at the early design stage. Economies of scale can be used to work in favour of people with a disability and the broader community can often benefit from the additional features as well eg. a volume control on a telephone handset.

In 2000 the Human Rights and Equal Opportunity Commission examined the issue of Universal Design in relation to the telecommunications industry in its *Report of Inquiry – Mobile Phones and Hearing Aid¹s*.

¹ Human Rights and Equal Opportunity Report, July 2000, Mobile Phone and Hearing Aids
http://www.hreoc.gov.au/disability_rights/inquiries/MP_index/mp_index.html

Appendix B
Taken from Submission 26 --
*Telecommunications Specific Competition
Regulation Inquiry*

Professor Michael Woods,
Commissioner,
Productivity Commission.

Dear Prof. Woods,

I wish to comment on my own situation in relation to the current Review of Telecommunications Specific Competition Regulation.

Last week I phoned my telephone service provider, Dingo Blue, to rent a TTY for my profoundly hearing-impaired and severely visually-impaired 13 year old son. He is at the age where he wants to phone his friends and I agreed to his request. Dingo Blue did not know anything about TTY's but suggested I phone a Telstra number for Dingo Blue Customers, which I did. At first Telstra stated I should contact my service provider but then gave me another Telstra number when I explained Dingo Blue had referred me to them.

We chose to take advantage of competition within the telecommunications industry and opted for cheaper rental and calls by transferring to Dingo Blue. Following my discussion with Telstra, I am left with no choice. If I want my son to have a rental TTY, then I must change back to Telstra so the TTY charge can be added to a normal account. I could buy a TTY but then I am faced with a dilemma if it needs repair at any stage.

It seems my son faces discrimination in that he must belong to a household with Telstra as the service provider to enjoy access to a TTY. In fact, as if he doesn't have enough problems with his sensory disabilities, my son is being denied a right that most people take for granted: the ability to communicate with other people on the telephone.

I am writing to confirm there is indeed a problem in the form of a Telstra monopoly. Recently I have written to many people in the telecommunications industry seeking their support to increase the range of services provided by carriers, in particular to people with disabilities, and soliciting their support for a change in legislation, if necessary. Obviously smaller telecommunications companies will need education on additional services and then motivation to make them available to their customers. There needs to be a revision in distributing costs of services such as provision of equipment, along the lines of the National Relay Service.

Anything you can do to identify a solution so a greater range of services is available to all people (including those with disabilities) regardless of carrier would be greatly appreciated. In the meantime, my son will continue to patronise the postal service and email providers although he would much prefer the telephone since so much of the population, especially his contemporaries, has access to this device.

Yours faithfully,

Deidre Windham.