

## **Provision of telecommunication services for customers with a disability**

In March 1993, the *Disability Discrimination Act 1992* ("DDA") came into effect and applies throughout Australia. Amongst other things, the DDA makes it unlawful for a person who provides goods or services or makes facilities available, to discriminate against another person on the grounds of their disability or the disability of their associates.

It is for each company to consider what their obligations may be under the DDA by defining what goods and services they may supply and whether that supply could be considered discriminatory under the DDA.

Under the Telecommunications (Consumer Protection and Service Standards) Act 1999, the Universal Service Provider is obliged to ensure that standard telephone services are reasonably accessible to all people in Australia on an equitable basis, wherever they reside or carry on business. Where necessary, and to achieve this obligation, the Universal Service Provider must supply standard telephone services to people in Australia (including requisite customer equipment or, where appropriate, disability equipment) upon request. Attached is an outline of the range of disability products and services Telstra, as the Universal Service Provider, provides under its Disability Equipment Program.

Telstra does not currently receive contribution from other carriers from the USO fund to fulfil its obligations to supply disability equipment under the universal service obligation ("USO").

Upon request, Telstra will supply customer equipment (including disability equipment where appropriate) to customers who acquire a standard telephone service (ie. basic line access) directly from Telstra. Where a customer obtains a standard telephone service from Telstra, the customer, if eligible, is entitled to disability equipment under Telstra's *Disability Equipment Program* even if they have pre-selected another carriage service provider for their long distance national and international calls.

Telstra is not obliged under the USO to provide disability equipment to resellers, other carriers, or the end user customers of resellers or other carriers.

In a competitive market, Telstra should not be the sole provider of disability CPE, nor fulfil that role at its own cost. The cost and responsibility for providing disability CPE should be shared equitably by the industry with individual service providers recognising and meeting the needs of their customers with disabilities.

However, to the best of Telstra's knowledge, since the opening up of the telecommunications industry to full competition, no other carrier or service provider has established its own program to supply disability CPE to its end user customers. Telstra understands that C&W Optus has been supplying disability CPE to its direct connect customers on a case-by-case basis.

Telstra recognises that the fact that if other carriers do not provide disability CPE does lead to a restriction in the choice of disabled users. However requiring Telstra to provide the equipment at greatly subsidised rates for no return on its use would be another example of placing a commercial burden on Telstra to the advantage of our competitors. The issue has more to do with other carriers meeting their obligations under the DDA.

## Telstra's Disability Services

Telstra is committed to delivering accessible and customised solutions for all our customers. For over 20 years, Telstra has been providing specialised telephone equipment to enable people with a disability to access the standard telephone network, undertaking research and developing new ways to make accessing the telephone easier.

As the national Universal Service Provider, Telstra has an obligation to ensure that standard telephone services are reasonably accessible to all people in Australia on an equitable basis wherever they reside or carry on business. Where necessary and to achieve this obligation, Telstra will supply customer equipment (including disability equipment) upon request where used in connection with the standard telephone service.

Telstra's current Disability Equipment Program ("DEP") is administered via Telstra's Disability Enquiry Hotline. Telstra supplies a range of equipment by way of hire to eligible customers. The DEP includes:

- Touchfone 400 Volume Control – Telstra branded, exclusive product;
- Touchfone 400 Voice Aid – Telstra branded, exclusive product;
- Audioline TEL35 Handsfree Telephone;
- Teletypewriters and computer modems;
- The Holdaphone;
- Additional telephone sockets for customers with impaired mobility;
- Cochlear Implant Telephone Adaptors;
- A General Purpose Alarm, and
- A Visual Alert – Telstra branded.

The equipment supplied by Telstra under the DEP conforms to the range of equipment listed by way of example in the *Telecommunications (Equipment for the Disabled) Regulations 1998* ("the Regulations"). The Regulations specify the kinds of customer equipment to be supplied for use in connection with the standard telephone service under the universal service obligation.

For information about the features and benefits of particular products and services, customers also request copies of Telstra's comprehensive catalogue: *Telstra Products and Services: A catalogue for older people and people with a disability*.

Customers may call Telstra's Disability Enquiry Hotline on **Freecall**<sup>™</sup> 1800 068 424\* (Voice) or Freecall 1800 808 981\* (TTY) to discuss their particular communications needs. The Hotline staff can give advice on eligibility for Telstra's Disability Equipment Program as well as more general information on special products and services.

Telstra has also under its own initiative, adopted parity of pricing principles in setting the rental charge for disability CPE at the standard rental charge. This means that the disability equipment in Telstra's Disability Equipment Program is available for hire to eligible customers for \$33 per annum, equivalent to the current rental charge of a standard handset. Furthermore, some items of disability equipment such as TTYS, telebrailles and cochlear telephone adaptors are GST-free and remain at \$30 per annum. Rental charges for disability equipment are not reflective of costs, which vary from over one hundred dollars up to approximately \$14,000 in the case of a telebraille. Telstra currently receives no contribution from other carriers to meet the cost of supplying disability equipment under the USO.

Furthermore, Telstra's DEP policy ensures that the reasonable needs of a household are taken into account. This means that if there are members of a household with a range of disabilities, Telstra will supply the equipment to meet the reasonable needs of the household, at the equivalent rental fee of a standard telephone.

Given these Telstra services, people with disability have equal access to basic telephony services to services available to the general population.

Whilst Telstra understands that one other carrier is considering a trial to provide a limited range of disability CPE for its direct-connect customers, Telstra has a number of services for people with a disability which distinguishes it from other carriers and service providers, and which extend beyond its obligations as the Universal Service Provider.

Telstra has:

- a dedicated Disability Services Unit ;
- a Disability Enquiry Hotline for voice and TTY calls;
- six Aged and Disability Centres located in state capital cities;
- Telstra was the first major corporation in Australia to develop a Disability Action Plan and lodge it with the Human Rights and Equal Opportunity Commission;
- a Directory Assistance Helpline established in 1994 for customers who are unable to read, hold or use the White Pages Directory and are unable to satisfactorily use the 1225 (013)/0175 service ;
- Braille bills and large print bills which were introduced in 1998 and 1999 respectively
- Telstra Call Connect - available free of charge to customers who have a disability or condition that makes it difficult to use or dial a standard telephone handset;
- development and distribution of a range of Customer information pieces on Telstra's disability services including:
  - brochures and applications forms associated with Telstra's Disability Equipment Program;
  - Telstra Products and Services, A catalogue for older people and people with a disability (also available as a CD version)
  - an Australian Sign Language video explaining the DEP, the launch of which coincided with Telstra's sponsorship of the XIII World Congress of the World Federation of the Deaf in 1999,
  - Telstra's Customer Service Charter; and
  - advertising and advertorial in disability sector and health professional publications;
- Telstra responds to individual requests for other customer information in alternative formats;
- TTY payphones; and
- TTY telephone directory published by Pacific Access.

Telstra recognises the importance of listening to customers and understanding their needs. Telstra has established formal consultative forums to bring together representatives of a variety of organisations including residential and small business customers, key disability organisations and Telstra senior management.

These forums occur regularly during the year and are an important influence in the planning and development of services and provide regular opportunities for consumer issues to be raised and examined.