

E-mail: fedservorg@gmail.com

Mobile: 94431 56100

FEDERATION OF CONSUMER AND SERVICE ORGANIZATIONS

Promoted exclusively to deal with the pressing issues..

(Regd. No.CAG/01/2016 as a Consumer advocacy group with TRAI)

No.5, 4th Street, Lakshmipuram,

Tiruchirappalli – 620 010. T.N. State .

The Chairman,
Telecom Regulatory Authority of India,
New Delhi – 110 002.

11th, Feb., 2018

Kind attention: Shri. Sanjeev Banzal , Advisor (CA & IT) TRAI

Dear Sir,

Sub: Fw our view on Consultation Paper on Making ICT Accessible for Persons with Disabilities – reg:

We are one of the Consumer Advocacy Group Members registered with TRAI has conducted a survey and study with the Persons with Disabilities and had a meeting with them and gathered their views and submit to your good self for your kind perusal in the larger interest of Persons with Disabilities:

Q1. Which are the disabilities, with specific accessibility requirement, other than those mentioned in para 2.3 that require consideration for preparing a framework?

Ans: It is claimed that previously 7 categories were there, now the Govt of India has enhanced the same to 21 categories including those mentioned within Para No.2.3 and dwarfs also.

Q2. Apart from the challenges enumerated in para 2.3, what other challenges do PwDs face while accessing telecommunication and broadcasting services?

Ans: Yes numbers of abnormalities are found; majority of the abnormalities as mentioned with the Para 2.3 and some percentage of abnormalities are increasing and these will be actively addressed under the CSR scheme or service minded companies and set up a special team to study.

Q3: In your opinion, what are the reasons for the desired benefits of ICT (telecom and broadcasting) not reaching the PwDs despite several policy measures and scheme being implemented?

Ans: Most of them are economically weak, illiterate and lack awareness. In our discussions some of the people expressed their serious concern about the roles played by many NGOs. It is alleged that they are siphoning out the money in the name of serving the

Pwds. Some of the participants are running STD booths; they claimed that the BSNL is collecting 30% of revenue from them and they claimed this is on the higher side. Considering their livelihood, the charges may be reduced to 10%.

Apparently there is no equipment available in the markets which are PwDs friendly except to identify No.5 with some mobile phone. They suggest designing the remote of the TV with voice in the keypads, if they press button 1, it would announce through voice. This is for visually impairment persons; another category the Audio impairment wants words to be scrolling to know.

Some PwDs suggested extension of call termination time.

Q4: What additional or corrective measures can be taken by the Government to enable better access to telecommunication and broadcasting services and devices to PwDs? Please give a rationale for your response.

Ans: They unanimously suggested for nominate Taluk level care takers to them to create awareness (now the State Governments are nominating District Level PwDs Officers in Tamil Nadu) and inform the schemes and how to avail it and the care takers should be only from PwDs.

The participation (PwDs) shows their steep dissident view on the NGOs, those who are acting as helping the PwDs, they claim that are not assisting them, but are swindling money in their name.

Q5: Apart from the measures suggested by ITU, what additional measures can be taken by the TSPs and equipment vendors/suppliers and other stakeholders to address the challenges faced by PwDs while accessing telecom and broadcasting services?

Ans: The TSPs will undertake some project in providing facility to PwDs under CSR schemes.

Q6. What are the areas where collaboration between various stakeholders would be useful and how?

Ans: The role of the manufacturers of Television and Mobile phones and other equipments in collaboration with TSPs and TRAI must actively provide better service to PwDs. They should discuss deeply through their Research and Development Department to produce PwDs friendly equipments.

Q7. Should the Government/TRAI direct the telecom and broadcasting service providers to provide information pertaining to billing, usage, pricing and contracts in the form accessible to PwDs? Please provide a rationale for your response.

Ans: Many of the PwDs are operating STD booth, Computer Centre and E service centres for their livelihood. In such case; the TSPs should exhibit some soft approach on them by collecting minimum charges from them.

Q8: Should the Government/TRAI mandate that the devices used for watching television provided through cable, satellite/DTH, fibre, etc. should be made accessible to PwDs?

Ans: Yes, it is most important, as mentioned the visually impaired persons opt for audio announcement about channel changing; another category the Audio impairment wants words displayed for scrolling to understand.

Q9. Should international accessibility standards be adopted for telecommunication and broadcasting services and devices in India? Please suggest steps required to ensure their adoption by the service providers/device manufacturers.

Ans: By and large, international standards are very user-friendly and compatible equipments are welcome.

Q10. What additional measures can be taken or technologies can be deployed by service providers or equipment manufactures to assist PwDs?

As mentioned for question Q8 may applicable for these two categories and remaining 19 may be considered after deep study by the experts of respective field.

Q11 Should device manufacturers be mandated to allow in their device's operating system those applications which are meant to assist the PwDs? Please justify your response.

Ans: Yes, otherwise, the manufactures would not show the interest, the TRAI may consider in fixation of percentage of equipments to PwDs and the concessional rates for these special products must fix very nominal and affordable to them.

Q12. What measures can be taken in India so that emergency services are made more accessible for PwDs? Should the implementation of these measures by TSPs be made mandatory by the Government?

Ans: Yes. It has to be fixed on some percentage of the equipments mandatorily, suitable for PwDs at the affordable and concessional prices.

Q13. Should the device/handset manufacturer be mandated to manufacture atleast one model of handsets for PwDs which is having accessibility features and which are compatible with assistive technology features such as hearing and visual aids including emergency buttons etc.?

Ans: Yes.. It will very useful to them and the rate of this model should be concessional and very cheaper.

Q14. How should companies be encouraged to utilise their CSR funds for development of applications, devices and services for the PwDs? What kind of devices and applications can be envisaged/ designed to make achieve ICT accessibility for PwDs?

Ans: The companies' CSR funds may be utilized for setting up a team to study all 21 abnormalities and their needs. As mentioned the device and applications for visually impaired persons, the operations should be through sound/ voice system; another category the Audio impaired want words to be scrolling to understand.

The TSPs must allow concessional tariffs to the PwDs, those who are running telephone booths, Internet centre and E. Centre for their livelihood.

Q15. Should any other funding mechanism for the development of applications, devices and services meant for the PwDs be considered? Please give a rationale for your response.

Ans: If possible; the TRAI also allot some funds from its CUTCEF fund and other sources.

Q16. How can effective campaigns be designed to create awareness about use of ICT accessibility tools? Can such campaigns be funded by CSR funds? If not, what other mechanisms can be used to fund such campaigns?

Ans: Yes, the CSR funds can be used. Other avenues should be probed and encouraged.

Q17. Should the Government incentivize the manufacturing and development of ICT tools and devices viz. tools for mobile accessibility, TV accessibility or for web accessibility for PwDs? Please give a rationale for your answer.

Ans: This is good suggestion; the Govt. will allow some tax concession and incentive to encourage in manufacturing and development of ICT tools and devices.

Q18. Please give inputs/suggestions/comments on any other issues which you feel are relevant to the subject matter.

Ans: In common we found only very few disabilities but the Government had declared 21 types of abnormalities after deep study. So, it is very essential to set up a team to study deeply and find the solutions to them, for example the short person facing some sort of problems, some persons using their legs using keyboards. So, this is a great humanitarian service and should be encouraged.

Thanks and regards.

M. Sekaran,

President.