

महानगर टेलीफोन निगम लि०

(भारत सरकार का उद्यम)

Mahanagar Telephone Nigam Ltd.

(A Government of India Enterprise)

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12 Feb 18
JIA(CA)
DA(CA)

MTNL/RA/TRAI-CP-17/2017
Dated 09.02.2018

JIA(CA)
Rajesh
12/2/18
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To,

The Advisor (CA & IT)
TRAI, New Delhi

Sub. : TRAI Consultation dated 20.12.2017 on "Making ICT Accessible for Persons with Disabilities".

TRAI issued a consultation paper on 20.12.2017 on the aforesaid subject and asked the various stakeholders to comment on the issues involved in the consultation paper. In this reference the following comments are submitted for consideration:

Advisor CA/IT
Dy. No. 188
Date 12.02.18

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

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

MTNL Comments: Although illiteracy is not classified as a disability, its prevalence among disabled persons and notably the visual and hearing-impaired communities in developing nations deserves special attention.

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?

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आप हमारे साथ हिन्दी में भी पत्राचार कर सकते हैं।

MTNL Comments: The various reasons may be:

- Lack of technology and related products
- Lack of funding in implementing or reaching to the desired segment
- Improper media selection

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.

MTNL Comments: The following may be considered in present context:

A. Activities for raising awareness among key stakeholders

- Using information kiosks, travelling exhibits, etc.
- Conducting media outreach activities in the form of advertisements and public service announcements that highlight accessible mobile products and services and educate consumers on their rights.
- Working with universities and research laboratories to develop universally designed products.
- Publishing data and survey results relating to mobile use by persons with disabilities.

B. Inclusion of PwDs in consensus building and policy making

Consensus building on the need for accessibility in mobile phones and services can be brought about by engaging key stakeholders – disabled consumers, manufacturers, network operators, regulators, governments, developers and accessibility experts in fruitful interaction and galvanizing them towards action. This may be achieved by:

- Encouraging national debate and discourse around accessibility through conferences and meetings showcasing innovative trends and developments, best practices and working models.
- Consulting with field experts including disability organizations, NGOs working in accessibility, experts in universal design etc.
- Adopting large scale initiatives for accessibility such as the voluntary charter for mobile accessibility signed by the French Government, service operators and disability organizations.

C. Developing user friendly devices for PwD's.

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?

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

In this reference following is suggested :

- developing accessible handsets for different types of impairments.
- offering customer service adapted to persons with disabilities and the elderly (such as accessible point of sales with personnel trained in various adapted forms of communications e.g. Braille and sign language.
- tailored services for the elderly and persons with disabilities,
- and special marketing and rate plans.
- phones with screen readers, voice activation and control, compatibility with Braille displays, front facing cameras, closed captioning, audible, visible and vibrating alerts and hearing aid compatibility.
- handsets large keys and a powerful speaker, one touch customer service dial-in and a menu system which uses a question-based interface with keys labelled "YES" and "NO."

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.

MTNL Comments: The TSPs, considering their social responsibility towards needful citizens should extend the convenient facilities for PwDs.

Further, the necessity of subscriber retention is enough reason for TSPs, to provide such facilities to PwDs. The Government/TRAI are therefore not required to regulate such issues, in present context.

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?

No Comments.

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.

MTNL Comments: In the present industry scenario, the industry being heavily debt ridden and higher cost of devices, It is suggested to avoid this call, at least for a few years, till the industry get financially improved.

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

MTNL Comments: Development of Digital libraries, GPS (making it mandatory), relay services (video, text, IM, captioned text), compatible

customer care services may be considered. Development of IoT ecosystem for PwDs is also suggested.

Further use of emergency service features may be made compatible for the use of PwD's. e.g.:

- In Europe, a single number (112) has been developed for placing emergency calls. European Union's ICT Policy Support Programme – allows disabled users to communicate with each other as well as directly with emergency services using alternative means of communication including texting. Under the scheme, alternatives like IP devices will be supplied to the disabled users to initiate simultaneous video, voice and text-based contact with the emergency services.
- The Australian government had initiated an SMS-based emergency service for the hearing impaired and hard of hearing community. Assistance can be requested by sending an SMS to the national emergency number 106.
- In the US, the Americans with Disabilities Act (ADA) requires all emergency service centres to have a Telecommunications Device for the Deaf (TDD) available for receiving emergency calls from similar devices.²¹ People with a hearing impairment using Video Relay Service (VRS) or IP Relay on their mobile phones can register and get 10-digit telephone numbers from their VRS or IP Relay provider in the US to make and receive calls, including calls to 911 emergency service centres.

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

MTNL Comments: Yes, subject to their compatibility with present technologies installed by TSPs.

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?

MTNL Comments: Any such features, supported by existing technologies are welcomed. Any mandatory provisions, not supported by installed technologies thereby mandating premature phase out of existing technologies will financially burden the TSPs, and will further bleed the industry.

Q13. Should the device/handset manufacturer be mandated to manufacture at least 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?

MTNL Comments: Yes.

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?

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.

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?

MTNL Comments: The TSP's are under obligation to comply the provisions pertaining to CSR, under the Companies Act. Further, till now there is no mandatory provision to discharge CSR obligations with in the same industry of operation. However, TRAI may recommend for use of CSR funds of TSPs in a specific manner, beneficial to the industry, provided it does not over reach its jurisdiction qua other existing legislations.

Q17. Should the Government incentivise 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.

MTNL Comments: Welfare of citizens is Government's obligation under the Constitution of India, and PwD's being privileged section of citizens, any step to support/incentivize the schemes for their welfare should be welcomed.

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

MTNL Comments: No comments.


09/02/18
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