

CONSULTATION PAPER DATED 20TH DECEMBER, 2017 ON “MAKING ICT ACCESSIBLE FOR PERSONS WITH DISABILITIES”.

Our comments to each of the issues raised by the Authority in this consultation paper are captured below :

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?

TN (Times Network) Comments:

Autism, mental retardation & illness, locomotive disabilities are other disabilities which can be considered apart from the ones mentioned in Para 2.3.

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?

TN Comments:

The PwDs may face challenges while accessing Internet services especially online bookings and payments etc. Since online bookings and payments have become very important in day to day life and in some cases mandatory, such services should be made accessible to the PwDs.

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?

TN Comments:

Cost of equipment and lack of awareness are among the major factors which are restricting the benefits of ICT not reaching the PwDs. In Indian society, disability is generally combined with poverty which is a major deterrent in making ICT accessible. For example- Many people with hearing impairment are not able to purchase and maintain the hearing machine, due to its high costs. Telecommunication services per se are an integration of several products and services and the players involved in this chain have to work in coordination to deliver optimum and quality service to customers who use them. As such, the effort required to come together to make ICT accessible to PwDs is a massive exercise. Any effort to bring ICT services to the PwDs in an efficient manner must factor cost and business impact for the players, especially the smaller players, as they may not be in a position to make changes to equipments, software, etc., to facilitate such services as it affects their business as well as revenue models. Lack of economic means, inadequate education and low awareness are also huge deterrents and need to be addressed before the service providers are mandated to accommodate ICT services for PwDs.

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.

TN Comments:

The cost of equipment should be brought down substantially. Audio assisted services / button assisted services may be given for telecom devices to PwDs. Benefits, tax and other subsidies for those who implement these measures. The choice to make this available must be voluntary. The broadcasting industry is currently facing challenging regulations, not to mention the difficult environment that continues to plague the industry. High costs, lack of revenue are issues that broadcasters have to deal with. Any change or additional investment that may be required to implement changes for

enabling ICT services to PwDs will have an impact on the business model of broadcasters. Unless there is economic value for all the participants in the value chain, any measure that increases costs and curtails economic freedom will not sustain in the long run. Government must support the industry to make it viable for broadcasters to take up these measures towards PwDs.

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?

TN Comments:

In case of telecom, the equipment compatibility serves the purpose for accessing the telecom services to PwDs. However in case of Broadcasting services, the equipment in terms of TV sets and STBs should be compliant. For this, BIS should set the standards which will be made standard for future manufacturing. Further the bigger challenge in case of broadcasting is the content. For the content to be made accessible to the PwDs, it involves a huge effort and costs. It should also be kept in mind that the programming envisaged to make accessible to PwDs are not causing disturbance in TV watching to other viewers. Further it will be an onerous task if all the 900 TV channels are strived to made accessible. To start, there can be few channels offering a mix of news, entertainment, cinema and the public broadcaster should lead the same followed by the private players. Again this must be voluntary and backed by benefits and subsidies that will encourage more efforts in this area.

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

TN Comments:

Hardware and software developers should come together in developing cost effective and practical technologies. Integration at every interface level is a must. In fact a research and evaluation team must continuously evaluate the efficiency of such measures and for this working with organizations and groups who support and deal with PwDs is critical. Education and awareness amongst the participants and understanding of the economic model of each player will play a key role in devising means of better coordination.

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.

TN Comments:

Since 97% users are prepaid, such direction will not really help and not much difference will be made. Without knowing that how many percentage of PwDs within the 3% post paid users use post paid connection, this exercise may not bring desired results. Instead of this measure, there should be a dedicated Unit within the regulatory bodies which address the concerns of the PwDs effectively and on priority. Another effective measure could be creating a dedicated cell within a telecom company to look into the requirements of the PwDs with care and concern.

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?

TN Comments:

It cannot be done for the existing set up. However for future manufacturing, BIS may come out with the standards and make them compliant in a phased manner.

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.

TN Comments:

The international accessibility standards cannot be adopted as it is as they have been set in tune with the socio-economic development of the country. Just replicating what is followed in developed countries would result in non-efficient use of resources. As stated earlier, In India, poverty is a bigger issue for PwDs. Even if there are equipments and services making ICT accessible, majority of the PwDs may not go for it due to various reasons. Further the issue of multi-cultural and multi-lingual society also poses added challenges. It may not be possible to have 900 TV channels being made accessible to PwDs. Hence a practical approach should be adopted so that efforts are made in the direction of making ICT accessible to PwDs which are workable and bring in desired results.

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

TN Comments:

Bluetooth technology, motion commands, voice assistance are some of the technologies which can be deployed.

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.

TN Comments:

This option is workable. BIS should set the standards. However it should be cost-effective and done in a phased manner.

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?

TN Comments:

SMS (text & voice) based help should be available. Every emergency services like Police, Fire, Hospitals should have a Special Unit with a capability to receive such messages.

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?

TN Comments:

It may not be desirable. Rather the Government should initially tie up with one manufacturer to manufacture a handset for PwDs which can be funded from the USO fund. Based on the response of this, further measures like making it mandatory on every manufacturer to have one model can be considered.

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?

TN Comments:

A separate fund consisting of the CSR contributions made by the companies in this field should be created for application, devices and services for PwDs. This fund should promote research & development in this field and meet the expenses towards the special technologies required for making ICT accessible to PwDs. Contribution to such fund should be incentivised through Income tax laws.

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.

TN Comments:

Initially, the Government should fund this project out of the Universal Service Obligation Fund (USOF).

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?

TN Comments:

Once the infrastructure is in place, effective campaigning can be done by involving the Government Departments at Union level, State levels, and at local / Panchayat levels. The NGOs can also do effective campaigns to make the PwDs aware about such tools. The Campaigns can be funded by the CSR funds and Government spends. Grassroot level awareness is a must. Schools and colleges must have curriculum that educates students to be aware of challenges faced by PwDs and must encourage efforts and activities that benefit and include PwDs.

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.

TN Comments:

Yes. The telecom and broadcasting sectors are already subject to competitive forces not only at national level but also at international level. Hence the special technologies required for this purpose needs special incentives and Government should greatly incentivise the manufacturing and development of ICT tools and must consider providing tax breaks.

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

TN Comments:

The need for making ICT accessible to PwDs cannot be underemphasized. Having said that, it is important to note that there are various critical differences between the developed countries where such accessibility is provided and the Indian society. Any attempt to exactly replicate the foreign model in India may not give the desired results. For example – even the hearing machine, which is a basic requirement for a person with hearing impairment is not accessible to most of the persons because of its high cost and its cost of maintenance. It is a fact that the poverty in case of PwDs is a bigger challenge. There are lesser employment opportunities and acceptance in society which works like a viscous circle. Hence though ICT should be made accessible, but it should be in real sense. We shall not introduce such technology just for the sake of introducing it and find that hardly a minute percentage of the PwDs are using it due to associated costs or just because they don't afford it. Such measures should be done in a phased wise manner and after due impact analysis of the steps taken and in a way that maximum of the targeted PwDs are able to avail the services.

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