



Mobile & Wireless Forum

22 January 2018

Advisor (CA & IT)
Telecom Regulatory Authority of India
New Delhi-110002
India

By Email: advisorit@traai.gov.in

Dear Advisor (CA & IT),

Consultation Paper on Making ICT Accessible for Persons with Disabilities (PWD)

The Mobile & Wireless Forum (MWF) submits these comments in response to the above-mentioned consultation paper.

By way of background, the MWF is an international association of telecommunications equipment manufacturers with an interest in mobile or wireless communications. Further information on the MWF can be found on our website at www.mwfai.org.

The MWF has been very active in the disability/accessibility area and established the Global Accessibility Reporting Initiative ("GARI") - an online reporting tool and public database of accessibility features available on individual mobile devices. GARI is widely used by stakeholders to help improve awareness of the range of options available within devices today and to assist consumers in the identification of a device that will best suit their individual needs. GARI can be accessed at www.gari.info.

The GARI site currently has information on over 110 accessibility features on more than 1100 phone models. It also has information on the accessibility features of tablets, connected wearables, smart TV's as well as more than 400 accessible apps for devices.

As you will note from a review of the GARI site, the accessibility features of these devices are constantly evolving and it is therefore important to avoid a rigid framework of specific accessibility requirements on equipment when those requirements can be quickly made redundant through technical innovation.

In response to your specific questions, the MWF provides the following responses:

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?

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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?

We believe that at least one answer to these questions is the continuing lack of awareness of both the features of devices and of where to obtain such information. This is not unique to India but a common challenge around the world. Each phone, tablet or Smart TV available in the market today has many accessibility features - it is just that many people are not aware of them. Therefore, highlighting those features will greatly assist in increasing awareness – and that is what GARI aims to do. With greater information for consumers, market forces can therefore play their part in influencing further enhancements. To this end, the United States Federal Communications Commission hosts an “accessibility clearinghouse” that allows consumers to browse for accessible devices on their website by utilizing GARI data directly within their site. This can be accessed at <http://ach.fcc.gov/products-and-services/mobile-devices/> GARI is also being used and referenced by many governments that you have referenced in Chapter III – and a list of links can be accessed on <http://gari.info/government.cfm>

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

As indicated above, the MWF believes that the Government of India can play a constructive role in increasing awareness of available features through hosting information such as GARI on its own website (an XML feed is available freely to Governments) and encouraging and/or mandating the provision of such information by manufacturers and suppliers. For example, in Australia, C625:2009¹ specifies the basic range of information that manufacturers must provide. In recognizing that GARI goes well beyond these minimum requirements, the Code also allows manufacturers to meet their requirements by providing the information via GARI (Clause 3.1.2). Likewise, Article 9 of the Brazilian Resolution No. 667 of May 30, 2016 requires that: “telecommunications service providers ... shall disclose the features, facilities or assistive technologies, oriented to the different types of disability, existing in the telecommunications terminals appearing in their commercial offers”. And finally, in Mexico, the Federal Institute of Telecommunications (IFT) issued general guidelines of accessibility to telecommunications services for users with disabilities (23/12/2016) which also incorporated GARI data directly into their website that is customized to meet local needs: http://movilesaccesibles.ift.org.mx/catalogo_desktop/app/web/busqueda.php

¹ C625:2009 INFORMATION ON ACCESSIBILITY FEATURES FOR TELEPHONE EQUIPMENT



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

The area of information provision presents one where collaboration between the various stakeholders would be very useful. Manufacturers want to be able to provide information about their products in a consistent fashion and which is accepted everywhere. This is a cornerstone of GARI and why so many manufacturers have participated. Once the manufacturer has provided the information, other stakeholders have access to that information to use and present it in a manner that best works for them. As an example, many network operators use GARI filtered for the devices that they support in their retail outlets. This ensures that retail staff who are not generally aware of the specific needs of PwDs have ready access to information that will help the customer from within their range. Likewise, Governments can promote awareness at a broader level and other stakeholders, such as groups that represent those with disabilities can also use parts of the information relevant to their constituents to help foster greater awareness, knowledge and ultimately, to help them find a device that best serves their particular needs.

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

The MWF believes that Smart TV's are already accessible. GARI already has information on 57 accessibility features within these devices. For example, GARI allows users to search whether a Smart TV has Spoken Subtitles, Voice Recognition for launching of applications, settings and operations, whether the device operates at a frame rate that won't cause problems for people with photo-epilepsy, and many more.

As indicated above, the MWF believes it is important to avoid a rigid framework of specific accessibility requirements on devices when those requirements can be quickly made redundant through technical innovation. Mandating the provision of information for consumers is likely to achieve a better result as it allows market forces to freely operate and allows innovation to continue.

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.

The MWF encourages the Government of India to adopt harmonized international standards wherever possible. As wireless devices are essentially designed and manufactured for global markets, the adoption of harmonized standards would ensure that Indian consumers have access to the very best devices as soon as possible and that these devices offer the same accessibility features as consumers in other countries.

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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.

For manufacturers participating in GARI, they already indicate whether the devices allow accessibility apps to be installed. Smartphones already allow this, whereas feature phones may not be able to support such apps due to a variety of reasons. However, it is important to recognize that not everyone wants the ability to be able to install additional applications. Many older people who suffer from arthritis or have some form of cognitive impairment prefer a simple feature phone because it is easy to use and has larger buttons. They want to use the phone for making and receiving calls only. Even text messages are a feature that they may not have a strong desire for. It highlights again that as there are so many devices with an extensive array of accessibility features, that providing information to the consumer about these will allow the consumer to find the best device for them and their circumstances rather than mandating features which may not be necessary or even desired.

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?

As indicated above, GARI reports on more than 110 features available with handsets today – and there is not one of the 1100 models that has answered No to all features (i.e. there is no phone that doesn't have any accessibility features at all). GARI already includes 33 specific features relevant to those with hearing impairment through to total hearing loss – including whether the device works with hearing aids or has a HAC setting, whether the device has adjustable vibrating alerts, or an adjustable maximum volume beyond the default volume control limit for those hard of hearing, or whether it has a front facing camera for those deaf users that need to be able to sign with others to communicate.

It is also our experience in talking with stakeholders that persons with disabilities generally do not wish for 'special devices' but prefer to have mainstream products that are accessible so they can be used by them. Also, bearing in mind our aging populations who are confronted with multiple possible impairments (failing vision, diminished hearing, loss of mobility etc.) and who themselves are comfortable with modern technology - suggest that a more practical and popular approach would be to encourage improvements in the general accessibility of mainstream devices rather than being prescriptive – the result of which may be a marginalized 'special' device that few want to use.



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The MWF appreciates the TRAI's efforts to improve the accessibility of ICT equipment and devices as well as the opportunity to provide this comment. We would be pleased to answer any questions that may arise from our submission.

Yours sincerely,

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