

1 September 2020

James Duck  
Project Manager  
Communications Alliance



Dear James,

**Re: DR AS/CA S042.1:2020 Requirements for connection to an air interface of a Telecommunications Network – Part 1: General**

The Australian Communications Consumer Action Network (ACCAN) welcomes the opportunity to comment on DR AS/CA S042.1:2020. ACCAN has limited substantive feedback on the content of the revised standard, however we would like to highlight that certain parts of the standard speak to the need for improved consumer education around making emergency calls from different types of customer equipment.

In particular, Section 5.4 'Provision of power-fail advice'<sup>1</sup> states that mains-powered customer equipment designed for voice communications must have a warning notice if the customer equipment does not continue to operate for more than 30 minutes after the loss of mains power. While we support the requirement to include this warning notice on customer equipment documentation or packaging, ACCAN believes that more should be done to educate consumers about the potential limitations of their devices. Some consumers may not be aware of these warning labels (particularly if the labels or customer equipment documentation aren't provided in formats that are accessible to consumers with disability), and therefore may not understand how their ability to call the emergency call service from this equipment is impacted by a loss of power. Indeed, a recent ACCAN consultation with members of the disability community illustrated a general level of concern about the accessibility of telco information, about devices, plans and contracts, but also about the use and resiliency of the emergency call service.<sup>2</sup> ACCAN believes that more information about the resiliency of customer equipment during power outages must be provided to consumers, and this must be done in a range of accessible digital and non-digital formats (such as, for instance, Easy English, braille, large print, social stories, and Auslan resources).

ACCAN also notes a few minor editorial issues found in the revised standard.

- In Section 4, Abbreviations and definitions, the abbreviation of 3G<sup>3</sup> provided in 4.1 reads: 'The fifth generation of mobile phone technologies covered by the ITU IMT family'. ACCAN believes 'fifth' should be replaced with 'third'. Furthermore, there is an abbreviation provided for ACE (Australian Communications Exchange) which does not appear to be used in the standard.

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<sup>1</sup> As per page 22 of the revised standard.

<sup>2</sup> For more information, visit: <http://accan.org.au/our-work/1765-accessible-comms-roadmap>

<sup>3</sup> Page 8 of the revised standard.

If the standard does need to refer to the National Relay Service Provider or the Emergency Call Person for 106, we note that Concentrix Services Pty Ltd has now taken over these responsibilities.

- In Section 5, Requirements, there are a few formatting inconsistencies. In 5.3.2 (Emergency service access),<sup>4</sup> 5.4 (Provision of power-fail advice)<sup>5</sup> and 5.6 (Telecommunications Device Identifier)<sup>6</sup> ACCAN believes 'shall' should be bolded, for consistency with the rest of the standard.
- In Section 6, Testing, there may be a formatting inconsistency that has '6.2.2.3 Response from network' appear at the end of a paragraph<sup>7</sup> rather than as a standalone subheading.
- In Appendix A3 there appears to be a subheading placeholder (A.3.1 Title of Appendix subheading 2)<sup>8</sup> that may need to be replaced with the actual title.

Thank you again for the opportunity to provide feedback on DR AS/CA S042.1:2020. Please do not hesitate to contact ACCAN should you require further information or clarification on any of the points raised above.

Yours sincerely,

Meredith Lea  
Disability Policy Adviser

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<sup>4</sup> Page 21 of the revised standard.

<sup>5</sup> Page 22 of the revised standard.

<sup>6</sup> Page 24 of the revised standard.

<sup>7</sup> Page 28 of the revised standard.

<sup>8</sup> Page 32 of the revised standard.