

09 July 2021



Communications Alliance
Level 12, 75 Miller Street
North Sydney NSW 2060
Via email:

Re: AS/ACIF S040: Telecommunications Disability Standard (Requirements for Customer Equipment for use with the Standard Telephone Service — Features for special needs of persons with disabilities).

The Australian Communications Consumer Action Network (ACCAN) appreciates the opportunity to contribute to the review of AS/ACIF S040: Telecommunications Disability Standard (Requirements for Customer Equipment for use with the Standard Telephone Service — Features for special needs of persons with disabilities). ACCAN recognises the contribution this Standard plays in relation to the supply of appropriately accessible communications equipment for people with disability, and the flow-on affect this has for other consumers.

About ACCAN

ACCAN is the peak body that represents all consumers on communications issues including telecommunications, broadband, and emerging new services. ACCAN provides a strong unified voice to industry and government as consumers work towards availability, accessibility and affordability of communications services for all Australians.

Consumers need ACCAN to promote better consumer protection outcomes ensuring speedy responses to complaints and issues. ACCAN aims to empower consumers so that they are well informed and can make good choices about products and services. As a peak body, ACCAN will represent the views of its broad and diverse membership base to policy makers, government and industry to get better outcomes for all communications consumers.

Whilst acknowledging the points raised in the Background Briefing paper, ACCAN strongly supports the retention of the current provisions contained in the Standard. It is more important than ever to ensure that the accessibility components of essential communications technologies remain in place to support the needs of seniors and people with disability for whom access to current mobile technology is not appropriate. These include people whose impairments render touchscreen technology difficult or impossible, people who cannot afford or who choose not to use touchscreen enabled devices, and people who, by virtue of their living situation, have no appropriate access to mobile services.

The Background Briefing Paper

ACCAN recognises the contention as laid out in the briefing paper, that mobile technology has largely moved towards the use of touchscreens for input and access, thus potentially rendering standard telephone style keypads largely obsolete. There are several situations however, where this trend could

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be leaving Australians at risk of significant disadvantage in terms of accessing the technology they need to maintain their independence and healthy relationships with members of their community, vital services, and information in emergency situations. Whilst the technology behind the provision of “Land-Line” services has changed from the analogue PSTN systems to IP based telephony, coupled with the significant and unforeseen take-up of mobile devices across the population, the equipment used by consumers in the provision of landline services remains largely unchanged. The standard telephone used in landline-based communications still contains the customary three-by-four keypad grid.

There is still a significant number of Australian consumers with land-line telephone services, reported to be forty per cent of Australians as of June 2020,¹ it is vital that the accessibility features currently mandated on telephone keypads, be maintained. Specifically, the “pip” on the five key is a feature which can be found on many keypads from Automatic Teller Machines to Point of Sale devices, digital keypads for building entry, alarm control panels and more. The pip on the five key remains a useful, and in some cases essential, device for the successful use of such keypads by people who are blind or vision impaired, people with some physical dexterity issues, people with some forms of neuropathy and older people. Furthermore, the pip may also serve as a safety feature, for example, for anyone who may be required to use a telephone in the dark in an emergency situation.

The pip enables a user to quickly and efficiently locate the three-by-four grid in the event that other buttons or keys around it may create confusion, particularly for people who are blind, or who are unfamiliar with modern communications technology. This is often the case where the telephone handset is not familiar, for example, in a hotel room, office, public phone or other such situation.

Mobile Technology

In 2021, most mobile phones and portable devices are accessed by means of a touchscreen, a trend which ACCAN recognises was unforeseen at the time of the creation of the Standard. There are, however, several devices, often known as “Feature Phones”, which maintain the standard telephone keypad layout. These devices are either specifically designed for people with disability or are useful for seniors and people with disability, by virtue of maintaining the standard telephone keypad. Whilst there are some “Smart Phones” available which a user can interact with in this way, typically these devices do not have the advanced features of touchscreen devices. Many of these devices are cheaper to manufacture, which renders them significantly more affordable. This makes these devices an attractive option for seniors, people with disability or people on low incomes. They often feel more familiar to older people, people with intellectual or learning disabilities, people with dexterity issues which prevent or inhibit their use of touchscreen enabled devices and those who do not require the extended feature-set of modern mobile devices. Maintaining the Standard, which contains the pip on or around the five key, is essential to ensure that these devices remain useful and accessible to those who need them.

Hearing Aid Compatibility

ACCAN recognises the significant developments in communications technology since Standard S040 was implemented in 2001, which increase the options available to people who are deaf or have

¹ Australian Communications and Media Authority (ACMA), (2021) ‘ACMA Communications and Media In Australia - How We Communicate’ <https://www.acma.gov.au/communications-and-media-australia>

hearing impairment. It is clearly understood that significant changes in hearing aid technology and new hearing aid standards such as Made for iPhone and others (which provide increased compatibility with mobile devices), has provided an even more significant benefit to people who can afford hearing aids or other assistive listening devices (ALDs) which are compatible with these standards. Clearly these developments promote inclusion through communication and offer people opportunities that were not available at the time the Standard was developed. It is essential that we recognise that while these trends provide excellent opportunities for many, there is still the potential to leave certain groups of people behind. These, in many cases, include people who are deafblind, people with additional communication needs, those who have no need or desire for mobile technology, people living outside mobile coverage areas, people facing economic hardship etc.

In addition, we foresee the rate of hearing loss increasing from 1 in 6 in 2006, to 1 in 4 by 2050.

(Clinical assessment of hearing loss in a section of the Australian population aged over 15 years shows that hearing loss affects approximately 22 % of the community.² The economic cost and impact of hearing loss in Australia by Access Economics (2006), shows that 1 in 6 Australians have some form of hearing loss, and this is projected to increase to 1 in 4 by 2050)

Standard S040 requires that any telephone sold in Australia has the ability to be used in conjunction with hearing aids through the use of tele-coils or other coupling devices. It is essential that this standard is maintained in order to protect the significant number of people for whom modern mobile devices are not appropriate or practical. Despite the modern connectivity standards employed by many hearing aid manufacturers, many devices maintain the ability to be used with standard telephones in this way. Maintaining standard S-040 represents an essential option for people without mobile coverage, who cannot afford or are not capable of using devices which employ these modern connectivity standards. It also ensures that people with hearing impairments have access to communications technology such as pay-phones, hotel phones, office phones and more, particularly important when the preferred communication option is not available.

In Conclusion

ACCAN recognises and supports S040 as a minimum which should be retained to ensure accessibility of standard telephony services in Australia. We strongly support the maintaining of this Standard and the accessibility components contained therein. It is vital that we ensure that no Australian with disability is left behind because of lack of accessibility to telephone-based technology.

Yours Sincerely,

Vaughn Bennison

Disability Policy Officer

Australian Communications Consumer Action Network

² The epidemiology of hearing impairment in an Australian adult population, Wilson et al. 1998.