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Submission 16 August 2024

Department of Social Services

By email: NDISConsultations@dss.gov.au

Re: Consultation on the Draft List of NDIS Support

The Australian Communications Consumer Action Network (ACCAN) thanks the Department of Social Services (DSS) for the opportunity to comment on the Draft List of NDIS Support (the draft list).

ACCAN is the peak body that represents consumers on communications issues including telecommunications, broadband, and emerging new services. ACCAN provides a strong unified voice to industry and government as we work towards communications services that are trusted, inclusive and available for all.

Access to phones and the internet is an essential part of life. In 2023, 95% of Australians used a mobile to access the internet, 97% for voice calls and 96% for texting.¹ The number of people using mobile phones to access apps is also increasing.² This usage will include government apps for the purposes of disaster warnings, identification and general services.

ACCAN is concerned that landline phones, mobile phones, mobile phone accessories and smart phones are specifically excluded from the draft list of NDIS supports.³ The current draft would block the purchase of devices with important accessibility features required for some NDIS participants to communicate.

ACCAN recommends that a 'carve out' category be created for these communications devices, which includes landline phones, mobile phones, smart phones and required accessories. This should be technology and platform agnostic,⁴ focusing on participants individual accessibility requirements for communication.⁵

We thank DSS for the opportunity to comment on the draft list. Should you wish to discuss any of these issues further, please do not hesitate to contact me at david.swayn@accan.org.au.

Yours sincerely,

David Swayn
Disability Policy Officer

¹ Australian Communications and Media Authority, 2023, p.2. *Trends and developments in telecommunications* 2022-23. Available at: https://www.acma.gov.au/sites/default/files/2023-12/Trends%20and%20developments%20in%20telecommunications%202022-23 0.pdf.

² Ibid.

³ There are specific devices and accessories available for the provision of captions, Auslan and other accessibility features like button sizing and volume controls that function as landline phones.

⁴ Noting that some broadly available but often cost-prohibitive devices and accessories are suitable as assistive technology solutions.

⁵ More detail on accessible communications devices is available at https://www.accessibletelecoms.org.au.



The Australian Communications Consumer Action Network (ACCAN) is Australia's peak communication consumer organisation. The operation of ACCAN is made possible by funding provided by the Commonwealth of Australia under section 593 of the Telecommunications Act 1997. This funding is recovered from charges on telecommunications carriers. ACCAN is committed to reconciliation that acknowledges Australia's past and values the unique culture and heritage of Aboriginal and Torres Strait Islander peoples. Read our RAP.