

The background of the top half of the page is a photograph of two hands holding a smartphone. The hands are positioned as if interacting with the screen. The lighting is soft, and the background is blurred, showing some bokeh light effects.

# Proposal to remake the TLN and eight telecommunications standards

9 December 2024

## Recommendations

This submission recommends that the ACMA:

- > Remake the TLN and the eight telecommunications standards.
- > Update Section 5 'Objects' of the 2025 Disability Standard to include a clause prescribing requirements and, where appropriate, recommend design features that remove barriers to access for people with disabilities.
- > Amend the 2025 Disability Standard to align with the Australian Government's people with disability style manual.

## About this submission

The Australian Communications Consumer Action Network (**ACCAN**) is pleased to provide this submission to the Australian Communications and Media Authority (**ACMA**) on the proposal to remake the *Telecommunications (Labelling Notice for Customer Equipment and Customer Cabling) Instrument 2015 (TLN)*, seven telecommunications technical standards, and the *Telecommunications Disability Standard (Requirements for Customer Equipment for use with the Standard Telephone Service — Features for special needs of persons with disabilities — AS/ACIF S040) 2015 (the 2015 Disability Standard)*. ACCAN supports remaking the TLN, seven telecommunications technical standards and the 2015 Disability Standard, which are due to sunset on 1 April 2025.

## Introduction

ACCAN supports remaking the TLN, seven telecommunications technical standards, and the 2015 Disability Standard, which are due to sunset on 1 April 2025. ACCAN further recommends several amendments to the revised *Telecommunications (Requirements for Customer Equipment for use with the Standard Telephone Service – Features for special needs of persons with disabilities – AS/ACIF S040) Standard 2025 (the 2025 Disability Standard)* to ensure customer equipment in connection with standard telephone services meets the needs of people with disability throughout Australia.<sup>1</sup>

## Consultation Question

### Do you have any comments on our proposal to remake the Disability Standard?

ACCAN supports the remaking of the 2015 Disability Standard due to the continuing public benefit of making a standard specifying the inclusion of accessible features that meet the needs of people with disability in customer equipment used to provide a standard telephone service.<sup>2</sup>

ACCAN recommends Section 5, 'Objects', of the 2025 Disability Standard include a clause illustrating the objective of the Standard is to advance accessibility by prescribing requirements and, where appropriate, recommend design features that remove barriers to access for people with disabilities for a standard telephone service. This additional clause would further align the objectives of the 2025 Disability Standard with the ACMA's Explanatory Statement section on Operation, which highlights the following:

*[Disability] Standard prescribes requirements, and where appropriate recommends design features, which remove barriers to access for people with disabilities.*<sup>3</sup>

Additionally, ACCAN suggests that the ACMA review and revise the 2025 Disability Standard to ensure its language aligns with the Australian Government's style manual for people with disability.<sup>4</sup> In particular, the ACMA should review terms such as 'special needs' as this term is often considered ableist and condescending.<sup>5</sup>

## Conclusion

ACCAN supports remaking the TLN, seven telecommunications technical standards, and the 2015 Disability Standard. However, we recommend the 2025 Disability Standard include a clause in

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<sup>1</sup> ACMA, *Proposal to remake the sunseting Telecommunications (Labelling Notice for Customer Equipment and Customer Cabling) Instrument 2015 and 8 telecommunications standards Consultation paper* (Consultation paper, October 2024) 1.

<sup>2</sup> Ibid 17.

<sup>3</sup> Explanatory Statement, *Telecommunications Disability Standard (Requirements for Customer Equipment for use with the Standard Telephone Service – Features for special needs of persons with disabilities – AS/ACIF S040) 2015*, 2.

<sup>4</sup> Australian Government, 'Style manual', *People with disability* (Web Page, 2024)

<<https://www.stylemanual.gov.au/accessible-and-inclusive-content/inclusive-language/people-disability>>.

<sup>5</sup> People with Disability Australia, *PWDA Language Guide: A guide to language about disability* (Language Guide, August 2021) 7.

Section 5, 'Objects' on prescribing design requirements to remove barriers to accessibility, and review terms such as 'special needs' to better align with the Australian Government's style manual for people with disability.

ACCAN thanks the ACMA for the opportunity to comment on this consultation. Should you wish to discuss any of the issues raised in this submission further, please do not hesitate to contact Dr Amelia Radke, Senior Policy Adviser, at [amelia.radke@accan.org.au](mailto:amelia.radke@accan.org.au).

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*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.](#)*

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