
Submission

19 January 2024

Department of Social Services

Via email: DRCResponseConsultation@dss.gov.au

Re: The Australian Government response to the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability

The Australian Communications Consumer Action Network (**ACCAN**) thanks the Department of Social Services (**DSS**) for the opportunity to comment on the pending Australian Government response to the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability (**DRC**).

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.

The 222 recommendations provided in the DRC are a significant opportunity for Australia to create impactful, lasting, and positive change across a variety of critical areas for people with disability, including access to communications products and services.

ACCAN recommends that the government response to the DRC should include:

- Establishing a Disability Rights Act (*DRC Recommendation 4.1*) and expanding on the proposed duty holders to include suppliers of critical infrastructure and recipients of substantial government funds.
- Adopting the proposed amendments to the Disability Discrimination Act (*DRC Recommendations 4.23 – 4.34*) and establishing a Digital Technology Standard to provide agreed guidance about what accessible technology is.
- Creating a national plan to promote accessible information and communications (*DRC Recommendation 6.1*).
- Harmonising legislation to align with recent international reforms and advancements to leverage economies of scale.

These recommendations are informed by ACCAN's engagement with people with disability on matters relating to communications since our formation in 2009, and are expanded upon in **Attachment A**. People with disability have consistently told ACCAN that Australia must make legislative changes that better protect and uphold rights to access inclusive information, communications, and technology.

Inaccessible communications technologies exclude people with disability from accessing education, employment, health, and social opportunities, all of which are primarily digital and online.¹ ACCAN

¹ Grand View Research, 2023. Growth of Digital Education Market Size. Available at: <https://www.grandviewresearch.com/industry-analysis/digital-education-market-report>; OECD, 2017: Use of online platforms in selected industries. Available at: <https://www.oecd.org/economy/growth/digitalisation-productivity-and-inclusiveness/>

has consistently advocated for accessibility improvements to be made across telecommunications products and services, devices, audio-visual content, web content, emergency services, safeguarding digital choice, service resilience and affordability.

These policy priorities are highlighted in an Ideal Accessible Communications Roadmap (**The Roadmap**),² attached as **Attachment B**, which was agreed on in consultation with 35 organisations, including Disabled Peoples Organisations, advocacy groups and a broad range of individuals with disability. ACCAN considers that many of the items in the roadmap can be systemically addressed with legislation that is robust and appropriate to the contemporary Australian communications environment.

State and federal governments are rapidly adopting digital transformation strategies which often focus on 'digital first' services, while we continue to grapple as a country with the already present digital divide.³⁴ As a result of these ongoing shifts in the marketplace and government policy, it is untenable to continue to allow the creation and deployment of inaccessible communications technology and services.

Beyond being inequitable and discriminatory, policy settings that continue to allow for inaccessible communications technologies and services represent poor economic and social policy. From growing risks to employment participation as the workforce of the future shifts,⁵ to already spending more time than people without disability managing a household,⁶ to being in danger during communications outages,⁷ people with disability are at risk of being excluded in an unregulated digital-first economy.

With these concerns considered, the economic and time burdens of rectifying inaccessible communications products and services one issue at a time should no longer be carried by people with disability. We must make systemic change that is supported by appropriate and ongoing oversight mechanisms.

ACCAN encourages the Australian Government to undertake the legislative reform proposed in the DRC, and to take meaningful action to position Australia as a leader in communications accessibility.

ACCAN appreciates the opportunity to provide comment on the government response to the DRC. Should you wish to discuss any of the items raised in this submission further, please do not hesitate to contact me at david.swayn@accan.org.au.

Yours Sincerely,

² ACCAN: Ideal Accessible Communications Roadmap, 2020. Available at: <https://accan.org.au/our-work/1765-accessible-comms-roadmap>

³ Australian Digital Inclusion Index, 2017. Case Study: Digital inclusion and disability. Available at: <https://www.digitalinclusionindex.org.au/case-study-digital-inclusion-and-disability/>

⁴ Australian Government, 2023. Data and Digital Government Strategy. Available at: <https://www.dta.gov.au/digital-government-strategy>

⁵ Australian Government, 2022. 9 out of 10 new jobs being created will require a postsecondary education. Available at: <https://labourmarketinsights.gov.au/our-research/employment-projections/>

⁶ Australian Bureau of Statistics, 2021. How Australians use their time, Table 8.2. Available at: <https://www.abs.gov.au/statistics/people/people-and-communities/how-australians-use-their-time/latest-release#data-downloads>

⁷ The Guardian, 2023. Optus went down and the smart lights came on. Available at: <https://www.theguardian.com/business/2023/nov/10/optus-went-down-and-the-smart-lights-came-on-and-then-marayke-was-stranded-in-bed>

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Disability Policy Officer

Attachment A: Further responses to ACCAN recommendations

Recommendation 1: Establish a Disability Rights Act and expand on proposed duty holders

ACCAN supports the establishment of a Disability Rights Act, noting that the protections recommended are broad and necessary. However, ACCAN does not support limiting the scope of initial duty holders:

1. Duty holders in the proposed DRA must include private providers of public infrastructure and services critical to participation in society, including telecommunications providers and retailers.
2. Duty holders should also include entities and systems in receipt of substantial public funding, including education institutions and other investments relating to economic and social participation.

It is reasonable to expect that wherever public funds are being spent, the rights of people with disability to access the funded product or service are being rigorously upheld.

The government must also take appropriate measures to ensure that the public, including individuals with disability are not responsible for the burden of monitoring and enforcing the Disability Rights Act. Subsequently, ACCAN also supports the establishment of a National Disability Commission (*Recommendation 5.5*) to undertake the necessary proactive monitoring and enforcement of the Act.⁸ The oversight of this may be most appropriately conducted by the appointment of a Minister for Disability.

Recommendation 2: Adopt the proposed amendments to the Disability Discrimination Act and include a Digital Technology Standard

ACCAN supports reforms that require all reasonable and foreseeable actions be taken to ensure that people with disability can access a product, service, place, or information without being required to complain and seek remedy.

In ACCAN's view these reforms would adequately balance the need to provide clear legal frameworks for duty holders with upholding the rights of people with disability and have the potential to create positive change for industry and society.

As noted in the DRC final report recommendations, the complaints process and structure would benefit from being strengthened. In future situations where a complaint is necessary, where the proposed DRA and/or reformed DDA's positive obligations have failed, ACCAN supports modernising the scope of unjustifiable hardship to provide better clarity as to the reasoning for the use of the clause. This includes improving the documentary evidence demonstrating how the decision was made by the alleged discriminator and working toward remedy, where required, within agreed and reasonable time frames. This will provide an evidence base and framework for both parties to engage on and build a more transparent and fair system for all. Any complaint raised should also be

⁸ Commonwealth of Australia, 2023. Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability. Governing for Inclusion, Final Report – Volume 5. Available at: <https://disability.royalcommission.gov.au/publications/final-report-volume-5-governing-inclusion>

utilised to review and inform options for systemic solutions, so that the next person in a similar situation does not need to complain.

Due to the rapid pace of growth in technology, it is also essential to provide clarity for all parties by creating a Digital Technology Standard under the DDA as recommended in the Human Rights and Technology Discussion Paper in 2019.⁹ This framework will provide the agreed guidance about what accessible technology is, how to evaluate it, and what is required in the design, development, and delivery process.

The DDA currently has a web accessibility advisory note,¹⁰ and this could be the launching point toward creating a standard. The Digital Technology Standard(s) should also specify required adherence to existing standards, for example AS EN 301 549¹¹, to help drive market improvements in the development and procurement of new technologies and services.

The creation of a Digital Technology Standard would also support the realisation of DRC Recommendation 7.23 which itemises improving procurement arrangements so that people with disability are not disadvantaged in the current and future labour market.

Recommendation 3: Create a national plan to promote accessible information and communications (DRC recommendation 6.1)

ACCAN supports the development of a national plan to promote accessible information and communications. As set out in Attachment B, a volume of work has already been undertaken on exploring the practical elements of accessible communications in the Australian context.

This process should:

- Consider work already undertaken in Australia to advocate for national improvements, including but not limited to the Ideal Accessible Communications Roadmap.
- Consider work already undertaken globally, unpacked in Recommendation 4.
- Start immediate work to bolster the workforce of skilled accessibility professionals, in addition to the recommended expansion of the Auslan interpreter workforce.¹²

While the development of a national plan is very likely to be beneficial, all core elements of any plan should be underpinned by legislative reform to solidify ongoing protections and oversight regarding rights to access information and communications, unpacked in Recommendations 1 and 2.

The need for underpinning positive obligations protections (as opposed to a plan in isolation) are apparent in the full text of DRC recommendation 6.1, where issues across broad sectors and often publicly funded industries are raised, including education.

⁹ Australian Human Rights Commission, 2019. Human Rights and Technology Discussion Paper. Available at: <https://humanrights.gov.au/our-work/technology-and-human-rights/publications/discussion-paper-human-rights-and-technology>

¹⁰ Australian Human Rights Commission, 2014. World Wide Web Access: Disability Discrimination Act Advisory Notes. Available at: <https://humanrights.gov.au/our-work/disability-rights/world-wide-web-access-disability-discrimination-act-advisory-notes-ver>

¹¹ Standards Australia, 2020. Accessibility Requirements for ICT Products and Services. Available at: <https://store.standards.org.au/product/as-en-301-549-2020>

¹² This should include reviewing any cost barriers to Auslan access, including for people who are not NDIS participants and older Australians.

Recommendation 4: Harmonise legislation to align with recent international improvements.

In considering the implementation of Australian law reforms, the government should consider reasonable and appropriate options for harmonisation with other nations and unions who have made similar efforts.

Global harmonisation is an opportunity to leverage world-leading frameworks and economies of scale to drive accessibility at least cost in the Australian context. We should consider:

- The European Accessibility Act (EAA) which is due to enter force in 2025.¹³ The EAA aims to harmonise approaches across the EU (European Union) relating to accessibility. If appropriately and fully implemented by member states, the EAA will drive market forces for the creation of accessible software, smartphones, digital television services, and more in Europe and globally.
- The European Electronics Communications Code (EECC), including reviewing elements relating to equivalent access to telecoms for people with disability, direct-text access to emergency services and affordable and adequate internet access for all.¹⁴
- The Accessible Canada Act (2019) and related amendments to legislation like the Canadian Radio-television and Telecommunications Commission Act.¹⁵
- Section 508 in the United States (US) including reviewing the Section 508 assessment reporting process and outputs to learn from almost two decades of attempts to improve.¹⁶

ACCAN notes that harmonisation should only occur if it directly protects and promote the rights of people with disability in Australia while contributing to the marketplace for accessible products and services.

¹³ European Union, 2023. European Accessibility Act. Available at:

<https://ec.europa.eu/social/main.jsp?catId=1202>

¹⁴ European Union, 2018. Directive (EU) 2018/1972 of the European Parliament and of the Council of 11 December 2018 establishing the European Electronic Communications Code (Recast)Text with EEA relevance. Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32018L1972>

¹⁵ Government of Canada, 2019. The Accessible Canada Act. Available at: <https://laws-lois.justice.gc.ca/eng/acts/a-0.6/>

¹⁶ United States Government, General Services Administration: Section 508 Assessment. Available at: <https://assets.section508.gov/files/reports/cr-2023/FY%2023%20Governmentwide%20Section%20508%20Assessment%20Report.pdf>

Attachment B: Ideal Accessible Communications Roadmap

Note: The introductory sections from the original roadmap document have been removed for the purposes of this attachment. This roadmap was developed in broad consultation with people with disability and representative organisations. The full document can be located on ACCAN's website.¹⁷

Inclusive telco services

Accessibility of information, plans and contracts

In an accessible Australia:

- All consumers would have free access to information about plans, devices, contracts etc. in a range of accessible formats (such as Easy English, plain English, braille, large print and Auslan resources) to suit their needs.
- At a bare minimum, all public documentation for consumers related to phone and internet services would be available in plain language and key documents would be available in Easy English.
- All consumers would have free access to capacity building programs (provided across a range of accessible channels, including online, face-to-face, telephone and live chat) that would assist them to set up and get the most out of their communications devices and plans.
- All consumers, particularly older consumers and consumers with disability, would have access to impartial information and any support they require to make a decision about communications technology purchases. The [Accessible Telecoms](#) project would be sustainably funded to continue providing this vital information.
- Telco and internet providers would have transparent accessibility policies to which they are held accountable.
- Consumers would be able to request information, plans, contracts, bills etc. in their preferred method and providers would honour this without charging any additional fees.
- All telcos would provide free directory assistance for customers with print, intellectual or physical disability.

Customer service

In an accessible Australia:

- All telco and internet provider call centre, customer service and frontline staff would be disability aware and would be trained in how to confidently and competently support all consumers with disability or accessibility needs.
- All telco and internet provider call centre, customer service and frontline staff would also receive specific Communication Access training. These staff would be trained in how to communicate in a clear, unambiguous and easy-to-understand manner. They would know how to interact with people with communication disability, actively listen to the person and take time to ensure they understood what was being discussed.
- All telco and internet provider customer service and frontline staff would have a basic understanding of the accessibility features of the devices they sell and how to activate

¹⁷ ACCAN, 2020. Ideal Accessible Communications Roadmap. Available at: <https://accan.org.au/our-work/1765-accessible-comms-roadmap>

them. In instances where this information and support is required, it would be provided free of charge.

The National Relay Service (NRS)

In an accessible Australia:

- All NRS call options would be available 24/7, would be of high quality and would meet the needs of all NRS users, including the option to be called through the NRS via a direct line.
- The NRS would be resourced to provide suitable call options for people with multiple accessibility needs, such as people who are Deafblind.
- Training and ongoing support would be freely available for all existing and new NRS users who require assistance.
- All businesses and government services would be trained in how to use the NRS, including how to make and accept NRS calls, and would welcome and promote the use of the NRS to their customers.
- All NRS staff would be trained in communication access and would be able to confidently support NRS users with communication disability (not related to hearing loss).
- There would be standards and monitoring around the use of real-time captions for NRS services created using automated speech recognition software in communications technology.

Safe and reliable communications technologies

Resilient services

In an accessible Australia:

- Accessible communications services would be recognised as essential.
- All communications services would be resilient and reliable across Australia, including in regional, rural and remote areas.

Emergency services

In an accessible Australia:

- Next generation emergency call service options would be freely available. This would include options to direct text, instant message, web or video call Triple Zero. These options would meet and exceed international best practices.
- Information about the use and resiliency of the emergency call service would be available to all consumers in a range of accessible formats.
- Appropriate backups and network resiliency would support all consumers to effectively contact the emergency call service as needed during power outages. This would include the provision of subsidised accessible power bank services for mobile phones to those who need it.

Health and wellbeing

In an accessible Australia:

- Priority assistance services would be offered by all telco providers at no extra cost. There would be a broader eligibility for priority assistance to recognise that some people with disability and older people may be heavily reliant on connected communications devices.
- The role of communications technology in relation to health and wellbeing would be better understood, particularly in relation to the need for ongoing connection and reliable services for health professionals and their patients.
- Telehealth services would be well funded and would be delivered through reliable infrastructure. This would support service delivery by allied health professionals such as dietitians, speech pathologists, psychologists and physiotherapists and other health professionals by allowing a wider range of interventions and assistance to be offered (for instance, supporting the use of apps to monitor physical activity, or using digital communications technologies to learn how to prepare food).
 - This would include sufficient funds for expert support and supervision of allied health professionals.
 - This would also include training and information for health professionals in how to deliver telehealth services via video remote interpreting.
- Connected devices and greater interoperability and connectivity would reduce social isolation and improve the wellbeing of older people and people with disability.

Scam protection and cyber security

In an accessible Australia:

- Protections would be in place to ensure that scams do not disproportionately impact older people, people with disability, children or people from culturally and linguistically diverse backgrounds.
- All connected devices would be designed according to secure by design principles to ensure maximum privacy for consumers. This would be regulated and subject to independent oversight.

Accessibility of devices

In an accessible Australia:

- Communications devices and devices that facilitate communications, such as mobile phones, landline phones, tablets, computers and modems, would be inclusive by design and would meet the highest standards of accessibility. These devices would be accessible straight out of the box and people with disability would not need assistance in setting them up.
- People with disability would be involved in the design of communications devices from the earliest stages to ensure these devices appropriately meet the needs of people with varied accessibility needs. People with disability would be appropriately remunerated for their involvement in this extensive user testing.
- Accessibility and universal design would form part of the mandatory curriculum for tertiary and vocational education courses relevant to science, technology, engineering, design or procurement. People with accessibility needs would be involved in the development and delivery of any such course content.
- The Universal Service Guarantee and enforceable Australian accessibility standards would ensure all products, devices and services are inclusive and accessible for people with disability and accessibility needs. Clear compliance processes would be in place between the public and private sector, both domestically and internationally.
- There would be a whole of government adherence to the updated Australian Standard AS EN 301 549, Accessibility requirements suitable for public procurement of ICT (Information

and Communication Technology) products and services. Regulatory oversight mechanisms would monitor adherence to this standard.

Affordable communications technology

In an accessible Australia:

- Accessible devices would be more affordable, due to increased public procurement of accessible information and communications technology. This would include the support of the NDIA (National Disability Insurance Agency) through their procurement processes.
- Mainstream communications technology and devices would be available for loan through local libraries, or through no interest loans for people who have accessibility needs. Subsidies would also be available to support people with disability and older people to access secure by design connected devices. Such subsidies would have low barriers to entry (e.g. simple and easy to understand forms).
- Mobile and broadband plans would be more affordable for those on low incomes. Internet subsidies would be available for those on the Disability Support Pension or Age Pension (or income support payments generally). Such subsidies would have low barriers to entry (e.g. simple and easy to understand forms).
- Installation and update costs for devices and services would be subsidised or completely covered by industry.
- The funding for mainstream and assistive communications technologies through the NDIS (National Disability Insurance Scheme) and My Aged Care would be predictable and transparent.
 - In particular, assistive communications technologies would be easier to access through the NDIS and My Aged Care schemes, and people would automatically receive free training on how to use these alongside existing assistive or mainstream communications technologies.
- All consumers would understand what they are paying for in terms of internet, mobile and landline phone coverage, and would be empowered to seek compensation where their service terms were not being met.

Inclusive online environments

Web accessibility

In an accessible Australia:

- All websites and apps would comply with the highest WCAG standards, and compliance would be routinely monitored. This would include all government websites and apps, as well as all programs, agencies and organisations receiving government funding.
- People with disability (including intellectual disability and people with low literacy) would be actively involved in the development of all apps and websites and in performing user testing to guarantee high standards of accessibility. People with disability would be appropriately remunerated for their involvement in this extensive user testing.
- Web accessibility requirements would be incorporated into the terms and contracts of government grants.
 - For instance, all programs, agencies or organisations receiving government funding would be required to set aside sufficient funds to undertake significant user testing with people with disability to ensure the accessibility of their resources (including their websites and apps). This would include a broad range of people, with a focus on those who typically are not involved in such testing, such as people with intellectual disability and people with communication disability.

- All procurement staff would be trained and fully aware of all accessibility legal frameworks and relevant standards. Adherence to these frameworks and standards would be monitored by sufficient regulatory oversight. People with disability would be employed within both public procurement teams and regulatory bodies to provide an additional layer of accessibility expertise.
- Standards would be developed to ensure online information is provided in a comprehensible and easy-to-understand manner, including via Auslan and Easy English translations. Accessible versions and translations would be provided at the same time as English content.

Digital inclusion training

In an accessible Australia:

- Free, formal training programs would be available to help bridge the digital divide. These would be tailored specifically to meet the diverse accessibility and information needs of all people with disability, including older people with disability.
- Peer education opportunities would be available to teach consumers a range of digital skills. These opportunities would either be funded through the NDIS or would be expanded versions of existing, mainstream digital inclusion programs.

Digital choice

In an accessible Australia:

- All consumers would be afforded full choice and control regarding what services they access in person and what they access online.
 - For instance, consumers would not be forced to apply for a new ID card online if it were more accessible for them to do this in person.
- All consumers would be given choice and control regarding which services and technologies they use. All consumers would be actively supported to transition to new communications technologies where such need arose, with compensation, long lead times and extensive training opportunities provided for any forced transitions.

Accessible audio-visual content

In an accessible Australia:

- Audio description and captioning would both be available 24/7 on every TV channel (main channels and multi-channels) as well as on online platforms, such as streaming sites, YouTube, and social media videos.
- Auslan interpretation would be provided on every TV channel (main channels, multi-channels, and online platforms).
- Auslan interpretation for emergency announcements and news programs would be mandated under specific legislation (including rebroadcasts of these announcements and programs on different platforms such as streaming services or social media sites).
- There would be a national task force with responsibility for accessible broadcasting, including legislation and associated accessibility policies and procedures for broadcasters to implement.
 - This task force would be comprised of people with disability, communications accessibility experts and providers, and audio-visual content developers and providers.

- Broadcasters would be required to perform regular quality assessments of the accessibility features provided on their channels. This would include live or auto captioning.
- All programs, agencies or organisations receiving government funding would be required to provide captioning, audio description and Auslan versions of all AV materials produced.
 - Specific funding would be made available to facilitate smaller businesses or not-for-profit organisations to meet this requirement.
 - Contractual agreements would stipulate that accessible AV resources must be made available within a prearranged time frame, with clear consequences of noncompliance outlined in contracts.
- Cinemas would routinely screen films with accessible features and would make information about such screenings available in a range of accessible digital and non-digital formats. Cinemas would also keep up to date with international developments in the delivery of accessibility features for all films.
- Advertisers would be required to fully caption their advertisements to ensure that people who rely on captions do not miss out on advertising information.

General accessibility

In an accessible Australia:

- Accessibility and inclusion would be embedded in government culture and the broader Australian culture and would be viewed as a metric to report against and improve upon each year.
- Transport services, such as trains, buses and planes, would feature accessible announcements (including visual and audio) to ensure all people have sufficient information about where they are and what's going on with any delays or changes.
- Auslan interpreters and other communication supports (including independent advocates and communication tools) would be readily available and sufficiently funded.
- Real-time transcription would be readily available in a range of settings to ensure people have access to all the information they require.
- Information would be provided in fully accessible digital and non-digital formats in all instances.
- Community meetings regarding emergency situations would be entirely accessible, including the provision of hearing loops, Auslan interpreters and live-captioning, as well as audio-described videos and information available in Easy English, braille, large print and a range of other languages.
- The NDIS would ensure all material is offered incorporating accessible communication options, as would all NDIS providers providing supports to participants.
- In order to fully embed accessibility across the board, the Disability Discrimination Act must be strengthened. This should also include accessibility for digital inclusion too.

Contributors and supporters

The Idea Accessible Communications in Australia roadmap was written by ACCAN. Contributors to and supporters of this document include:

- [Able Australia](#)
- [AccessibilityOz](#)
- [Advocacy for Inclusion](#)
- [ADA Australia](#)
- [Allied Health Professions Australia](#)
- [AQA Victoria](#)

- [Australian Sign Language Interpreters' Association](#)
- [Autism SA](#)
- [Blind Citizens Australia](#)
- [Centre for Inclusive Design](#)
- [Combined Pensioners & Superannuants Association](#)
- [Deaf Australia](#)
- [Deaf Services](#)
- [Deafblind Australia](#)
- [Deafness Forum of Australia](#)
- Deb Fullwood
- [Dietitians Association of Australia](#)
- [Down Syndrome Australia](#)
- [Grampians disAbility Advocacy](#)
- [IDEAS](#)
- [Limbs 4 Life](#)
- [People with Disability Australia](#)
- [Physical Disability Council of NSW](#)
- [Pinarc Disability Support](#)
- [Scope Australia](#)
- [Senses Australia](#)
- [Speech Pathology Australia](#)
- [Stroke Foundation](#)
- [Technical Solutions Australia](#)
- [Technology for Ageing and Disability WA](#)
- [Deaf Connect](#)
- [Vision 2020 Australia](#)
- [Youth Disability Advocacy Service](#)

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](#)
