



Questions on notice: Senate inquiry into emergency communications

Date issued: 30 August 2011

1. Are you satisfied that the current emergency call service 106 (equivalent to 000) provides adequate assistance to deaf, hearing-impaired and speech-impaired persons? How effective was the service during the Queensland floods? Were other National Relay Service (NRS) services available during the height of the floods?

ACCAN believes that the 106 emergency service is analogous to Triple Zero in providing assistance to people who are Deaf, hearing-impaired or speech-impaired *and who use a TTY* (telephone typewriter).

The 106 emergency service continued to work effectively nation-wide throughout the period of the Queensland floods, thanks in large part to the assistance provided by Telstra.

However, other NRS services were not available for a period of 23 hours. This included emergency calls for Speak and Listen (for customers with little or difficult-to-understand speech) and customers who use internet relay (who may be Deaf, hearing-impaired or speech-impaired) as well as all non-emergency calls throughout Australia, including potential calls to the SES.

We remain concerned that the Triple Zero access through the Speak and Listen and internet relay services provides lower access to emergency services when compared with mainstream access.

2. Can these other services (e.g. internet relay services) be provided with the same protection as the 106 call service to ensure that the relevant disabled persons can continue to make contact with carers, family members or friends?

It is ACCAN's position that, to the best extent possible, all emergency calls via the NRS should have the same protections in place as 106 and indeed, direct calls to 000. The Speak and Listen and internet relay emergency calls currently provided by the NRS do not have these protections.

We believe that it is possible to address the shortfalls of these services by implementing a priority call system, guaranteeing access to the services (even where a customer has no credit or has a barred service), guaranteeing free emergency calls, maintaining a record of a consumer-relay officer 'call' and committing to uninterrupted service availability.



It is our understanding that the NRS is working on ways to ensure that Speak and Listen and internet relay calls to Triple Zero get priority over other (non-emergency) calls. We welcome this development.

We note that direct calls to 000 as well as to 106 are already available to 'soft dial tone' lines (that is, where perhaps other calls have been barred due to lack of payment or credit) on landlines (and for direct calls to 000 too in the case of mobile phones). However, this is not the case for 000 calls made via the Speak and Listen service (which is a 1300 number). One solution to this might be to change the Speak and Listen process so that it occurs via 106, and to also ensure legislatively that this service is also available from all mobile phones, in the same way as 000 calls can 'roam' and can be dialled from 'soft dial tone' lines and phones which have run out of credit.

ACCAN acknowledges that ensuring continuing access to internet relay when a smartphone is out of credit or has been barred to non-emergency calls, or when an ISP bill has not been paid, is more complex. We look forward to working with DBCDE, the ACMA, Communications Alliance and other stakeholders to resolve this issue.

3. What progress is being made with regard to the establishment of the proposed video relay service (VRS) for deaf callers and the proposed emergency SMS service for hearing and speech-impaired persons?

Video relay

The Australian Communication Exchange (ACE) continues to trial VRS for Deaf callers; however, this is not part of the NRS and is not a 24/7 service.

The Department of Broadband, Communication and the Digital Economy (DBCDE) is in the process of reviewing access to telecommunications for people with disability (see www.dbcde.gov.au/disability) and ACCAN is in the process now of finalising our submission.

ACCAN strongly supports a VRS for Deaf people to be incorporated into the NRS (and also sees scope for video to be used by the NRS to further assist people who are hearing-impaired or who have [complex communication needs](#)). We understand that a number of other organisations will also be writing submissions recommending the implementation of a 24/7 VRS as part of the NRS. This is critical for the Deaf community, for many of whom English is a second language (with Auslan, Australian Sign Language, being their first language), and also because – and this is particularly salient in an emergency – text-based calls are so much more time-consuming than a call taking place in Auslan.

Emergency SMS

The DBCDE continues to investigate the possibility of implementing an emergency SMS service for people who are Deaf, hearing-impaired or speech-impaired; however, they have informed ACCAN that there remain a number of significant technical and legal hurdles to be overcome before a trial can proceed. ACCAN remains supportive of a trial if and when it becomes feasible.

The DBCDE is also investigating another possible way of providing access to emergency calls via mobile for people with disability. They are working with ACE to develop a smartphone application which would enable connection and real-time conversation with Emergency Service Organisations via a relay officer, in a similar way to that currently provided to TTY users via 106. ACCAN is also supportive of such a trial but cautions that



smartphones remain physically and financially inaccessible to some users and that the trial provides an excellent opportunity to attempt to resolve these issues.

4. Do you think that the Telecommunications Act provides sufficient onus on telecommunication companies to provide disability equipment to affected persons? Is such equipment suitable for landlines only given that location information can be provided via a landline service?

It is ACCAN's understanding that there is no requirement under the Telecommunications Act for telecommunications companies to provide disability equipment. However:

- Telstra does have an obligation under the Universal Service Obligation to provide disability equipment
- All telecommunications (and other) companies are responsible under the [Disability Discrimination Act 1992](#) for refraining from discriminating directly or indirectly against people with disability. It could therefore be argued that any telecommunications company which provides handsets to customers from the wider community must also provide the equivalent of a handset (such as a TTY) for customers with a disability. Optus, AAPT and Primus all do, we understand, provide very limited equipment for customers with a disability.

Disability equipment provided through an industry-run disability equipment program is only suitable for landlines only. It is ACCAN's position, however, that people with disability should be entitled to the same access to landlines, mobiles and internet services which other Australians enjoy.

In the case of emergency services, the recent amendment (and likely future amendments) to the [Telecommunications \(Emergency Call Service\) Determination 2009](#) in regards to mobile location information and VoIP location information mean that customers who use mobile devices or VoIP to make emergency calls will have similar protections to landlines in place, in terms of the disclosure of location information.

People with disability who use mobiles or internet protocols (including internet relay and video relay) should be entitled to this same range of platforms to make emergency calls. The lack of subsidised accessible equipment has the unintended consequence of limiting access to emergency services for people with disability.

ACCAN's submission to DBCDE's current review will also be calling for a new independent disability equipment program which includes mobile and internet equipment as well as landlines.

5. Can you come back to us in terms of what we are looking at—that is, a warning system—when you have given consideration to community based warning systems for people with disabilities and how the community can assist in an emergency?

In our submission to the DBCDE review of access to telecommunications, ACCAN has identified the steps we believe are necessary to remove barriers to enable all Australian to use telecommunications services. We expect that following the adoption and



implementation of these measures, Australians with disability, older Australians and people experiencing illness will be able to use telecommunication services to contact the government or, if they wish, to have the government contact them.

However, we recognise that the question of being contacted in an emergency situation such as fire or flood is much more complicated than improving access to telecommunications equipment and services for people with disability, older Australians and people experiencing illness. We understand, for example, that current automated emergency warnings to landline phones do not recognize when the call is answered by a TTY or TTY answering machine. The emergency warnings systems being used by the Australian government should be reviewed for accessibility and, if necessary, integrated into the NRS service platform to ensure accessibility of emergency alerts for its users.