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Submission No 20

Committee Secretary
 House of Representatives Standing Committee on
 Legal and Constitutional Affairs
 PO Box 6021
 Parliament House
 CANBERRA ACT 2600
 AUSTRALIA

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BY: LACA

12 February 2009.

We thank you for the opportunity to make comment of this draft standard.

Audio Telex is an Importer and distributor of professional audio products throughout Australia and New Zealand including Ampetronic products. Ampetronic are manufacturers of Assistive listening devices namely hearing loop drivers (amplifiers).

Submission to the Draft Disability (Access to Premises – Buildings) Standards 2009.

D3.7 Hearing augmentation

The performance of hearing augmentation systems is not referenced at all as far as we can see though, except in the public transportation buildings section. The document should refer to the current standards relating to hearing augmentation systems. Without this it may imply that to meet the disability standard a service provider must have a hearing augmentation system, but it doesn't necessarily have to work very well.

Table E3.6 page 43

The section on lifts includes a note at the bottom of the table on hands-free communications in the lift. If there are audible communications in the lift, surely these need hearing augmentation too. In Europe / UK, legislation is now mandating induction loops in these situations in lifts. It makes a lot of sense if you are relying on two way communications with people in the lift car in an emergency, which is often the case. This section should include this explicitly.

Submission to the Draft Disability Standard Guidance 2009.

The **Draft Disability Standard Guidance** seems to rather undermine the core standard in section D3.7. Here it states that 100% coverage is not required, but doesn't go on to state why or where, or what might be an acceptable minimum performance. If this text is going to be included, it should also include restrictions for example, if coverage is <100%:

- There must be clear indication of which areas are served and which are not.
- There must be a clearly stated reason for reducing coverage area (so it is not just a license to get away with the bare minimum).
- There must be a minimum of x% coverage.

Without these caveats, the text in these guidance notes seems unnecessary and rather ambiguous.

Yours sincerely,

Peter Bayfield
 Brand Manager, Ampetronic

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