

Committee Secretary  
Senate Select Committee  
National Broadband Network  
Department of the Senate  
PO Box 6100  
Parliament House  
Canberra ACT 2600  
AUSTRALIA

Friday, 3 July 2009

Dear Ms Kelly,

**Re: Senate Select Committee on the National Broadband Network  
Request for Submissions**

The Australian Federation of Deaf Societies (AFDS) is pleased to jointly submit to the inquiry in coalition with the Australian Communication Exchange (ACE), and provide the following attached comments for the consideration of the Committee.

Key developments have been made since our previous submission (numbered 10 as of May 2009), and an industry working group has been established to review the possibility of a next-generation Video Relay Service. Currently, the Federal government provides funding for the National Relay Service, which is aimed at audio telephony communications. However, with the high demand for video communications amongst the Deaf Community, and the international frameworks of video relay services, we are pleased to provide a recommendation towards a next-generation Video Relay Service.

AFDS is the peak body representing the interests of organisations providing services to the Australian Deaf community. Consisting of the state Deaf Societies of New South Wales, Queensland, South Australia, Tasmania, Victoria and Western Australia, the Federation was formed in 1966 with the principle objective of improving Commonwealth and State government awareness of issues relating to the sector. As Deaf Societies provide a broad range of services to the Deaf community including employment, welfare and sign language interpreting, Deaf Societies are well placed to provide advice on issues relating to the delivery of services in the sector.

Deaf Societies also work closely with other service providers in the sector, including Deaf Australia (formerly the Australian Association of the Deaf) and the Australian Sign Language Interpreters Association.

The Australian Communication Exchange (ACE) is a not-for-profit, Australian organisation dedicated to empowering those who are Deaf or have a hearing, speech or communication impairment, to obtain access to the telephone and other telecommunication networks.

AFDS and ACE believe that with currently expanding technological development for Deaf services, and the global trend to provide Video Relay Service (VRS) as a standard subsidised service, the Federal Government must ensure that the framework and infrastructure of the proposed National Broadband Network will support the requirements of VRS.

Enabling a broadband network that supports a next generation VRS would significantly support the *Social Inclusion* policy of the current government. Previously, a service such as VRI (as assessed in our previous submission) has only been accessible by the highest-paying users of broadband internet, and therefore has left much of the Deaf community without needed services. A next generation VRS would provide these much-needed services to the Deaf Community in a more efficient and timely manner.

Enclosed with this letter are the key recommendations and concerns as assessed by the industry Video Relay Service Working Group, which includes the Australian Federation of Deaf Societies and the Australian Communication Exchange.

We would be pleased to provide the Inquiry with any further information or to expand on our submission in a hearing in due course.

Yours sincerely,



Alex Chapman  
Policy & Strategy Coordinator  
Australian Federation of Deaf Societies  
PO Box 1060  
PARRAMATTA NSW 2124

 Sandy Gilliland  
Chief Executive Officer  
Australian Communication Exchange  
PO Box 473  
STONES CORNER QLD 4120



Australian Federation of Deaf Societies and the Australian Communication Exchange

**JOINT SUBMISSION**

**Senate Select Committee  
National Broadband Network**

**June 2009**

## **BACKGROUND TO THE AUSTRALIAN FEDERATION OF DEAF SOCIETIES**

The Australian Federation of Deaf Societies (AFDS) was established in 1966 to meet the needs of organisations providing services to the Australian Deaf Community.

Member organisations include:

- Deaf Society of New South Wales
- Deaf Services Queensland
- Royal South Australian Deaf Society (Deaf CanDo)
- Tasmanian Deaf Society (TasDeaf)
- Victorian Deaf Society (VicDeaf)
- Western Australian Deaf Society (WADeaf)

The combined annual turnover of AFDS member organisations is over \$30,000,000 with a wide range of services and projects provided including:

- Auslan Interpreting services,
- Counselling services,
- Children and family support,
- Support services for older people,
- Independent Living Skills programs,
- Community Education programs,
- Deafness Awareness Training programs,
- Employment services,
- Services for people with hearing impairment,
- Legal education project, and a
- Women's project.

AFDS has lobbied and made representations to various organisations and government inquiries on issues such as improved access to education, employment, interpreting, captioning and TTY relay services for Deaf and hard of hearing people. This has included advocating for the establishment and funding of the Australian Caption Centre, the National Relay Service and the National Auslan Interpreter Booking and Payment Service (NABS).

AFDS has provided financial and in-kind support for various events and activities and to numerous organisations, helping these organisations to become established, independent bodies.

AFDS worked with the Deaf Community in lobbying for the recognition of Auslan as a community language by the Australian Government and the accreditation of Auslan interpreters by the National Accreditation Authority for Translators and Interpreters (NAATI).

In conjunction with Deaf Australia (formerly Australian Association of the Deaf), Australian Sign Language Interpreters Association and other national partners, AFDS provided input into recent research commissioned by the Australian Government into the supply, demand and funding of Auslan interpreting services in Australia. The research commissioned by the Australian Government Department of Family and Community Services led to the funding and establishment of the National Auslan Interpreter Booking and Payment Service (NABS).

## **Background of the Australian Communication Exchange (ACE)**

The Australian Communication Exchange (ACE) is a not-for-profit, Australian organisation dedicated to empowering those who are Deaf or have a hearing, speech or communication impairment, to obtain access to the telephone and other telecommunication networks.

## Revised Terms of Reference

The Australian Federation of Deaf Societies (AFDS) and ACE are pleased to provide to the Committee the following comments and recommendations regarding the revised Terms of Reference adapted by the Senate (14<sup>th</sup> May 2009).

### NATIONAL COVERAGE

The Australian Federation of Deaf Societies and ACE acknowledges that ninety per-cent of homes, schools and workplaces will be connected with an FTTP (fibre optic) connection. It is possible through the FTTP network that speeds are available of up to 100 megabits per second [ToR 1(a)i].

Referring to the joint submission between AFDS and the Australian Communication Exchange (listed as Number 10 by the Committee as at 10 May 2009), and the recommendations contained within that submission, AFDS and ACE are pleased that these speeds (384kb/s synchronous) are able to be reached under the proposed FTTP network. However, these are only guide speeds thus far, and AFDS would

However, concerns must be raised regarding the satellite network and the quality of connection to the other ten percent of premises.

As noted in the original submission by AFDS and ACE, speeds **must** be guaranteed as synchronous and stable above 384kb/s to provide equitable Video Remote Interpreting. The concerns are as follows:

1. There is no confirmation as to the geographical base of the proposed ninety percent FTTP network, and the ten percent satellite network. Following the Federal Governments' National Broadband Network policy, there has been no confirmation as to the areas that will go either without service, or without the FTTP service.
2. Referring to the Second Interim Report of the Committee investigating the *Roll-out of NBN in Tasmania*, the network is "expected to take five years ". This process is lengthy and will put Australia further behind the United Kingdom and the United States in terms of providing VRI services to the Australian Deaf Community.

## **The Case for a Video Relay Service in Australia**

International examples (such as the United Kingdom, United States and Sweden) have shown that a Video Relay Service is a vastly more efficient service than using traditional Telephone Typewriter (TTY) communications. The Federal Government currently funds the National Relay Service (NRS), which uses telephones, online communications (chat and MSN) and TTY. The NRS is an Australia-wide telephone access service provided for people who are deaf or have a hearing or speech impairment. It is also available to anyone who wants to call a person with a hearing or speech impairment. Currently, there is no means via which to provide Video Relay Services through the NRS.

Communication and service provision in the Deaf Community should be provided, where possible, in Auslan. Lower literacy levels in English and fluency in Auslan, means that for many Deaf Australians, the preferred mode of communication is using Auslan - not English.

As such, AFDS and ACE recommend that through the expansion and development of the National Broadband Network, the ability to provide both Video Remote Interpreting (VRI) as well as the possibility of a Video Relay Service (VRS) would be highly advantageous in providing wider, faster and more efficient services to communities that require it the most.

### **Regional and Rural Areas**

AFDS sees the National Broadband Network the first step to providing an equitable back-bone for the provision of Video Remote Interpreting and a Video Relay Service.

However, it is crucial that the network be rolled-in from the areas that currently do not have access to broadband. Currently, to provide services in Auslan to regional and rural areas either VRI is used (if the equipment is available), or an interpreter would have to attend. This is a significant drain on resources.

### **Recommendations**

#### **1 Broadband Service Standard**

##### **a) Download/Upload speeds**

For most videophones to work optimally with a broadband connection, it is vital that the broadband service purchased by the videophone consumer provides an adequate **download/upload** speed (including allowance made for any other internet traffic used at the time in the home or the workplace). It would be absolutely critical to include in the Communications Service Standard, which future broadband service providers must adhere to, at least a minimum of 2mbps download/upload speeds at all times.

##### **b) Latency**

Likewise standards that apply to latency are essential if optimum video calling is to be achieved on par with voice services. Latency is common when using video based chat software applications especially when there is heavy internet traffic at the same time and needs to be addressed in time when the NBN becomes available.

### **c) Price & speed capping**

It is absolutely essential that broadband services that are available through the NBN do not have speed capping included so that Deaf people who opt to use video communications are assured that they will have access to the required speed at all times.

In addition to above, it is imperative that broadband prices and plans are affordable to enable Deaf people to take up video communications in their homes (and in workplaces as well) and every effort should be made to include consumer representatives all the way through the deliberating process. The basic broadband plan that is priced affordably actually allows Deaf consumers to take up video communications that is within their budget, at cost no greater than it requires for a normal person to use a voice services using Voice over Internet Protocol (VoIP).

### **Mobile Service Standard**

The standards included in the Mobile Service Standard should address interoperability of mobile phone devices with videophones and to ensure that mobile devices are continually upgraded to provide a clearer picture quality. In instances where mobile devices require operating access through the Internet, the Standard should also impose minimum download & upload limits that are significantly above the optimum requirement for mobile video calling.

Currently mobile calls using video calling are priced 20 cents above voice calls and this is considered to be discriminatory for Deaf consumers who are unable to use the voice component. The Mobile Service Standard should include a basic principle that video calls be priced on par with the current voice calling prices.

### **Priority assistance**

For Deaf people who use video communications in the future, it is essential that any changes made to the existing priority assistance requirements should be forward looking to allow Deaf people to receive priority assistance if their primary use is a videophone in the home and emergency services were expanded to include IP based calls. Allowing access for Deaf people to priority assistance will ensure that Deaf people do not experience significant delays with re-connection and fault repair should their broadband connection break down, so that access to emergency services is not further jeopardised.

### **The bigger picture**

The new NBN infrastructure will enable the NRS to be progressively updated to become the '*Next Generation NRS*' by adding Video Relay Service and Captioned Telephone Relay services to the existing NRS services, only by ensuring that these new relay services are federally funded through a levy scheme.

A Next Generation NRS, inclusive of Video Relay, would bring Australia's services up to a level that has been far behind that of the United Kingdom, the United States and other European countries.

The lack of equitable broadband speeds, fair pricing, and community services provided as a result have held back the inclusion and development of the Australian Deaf Community for far too long.