



Women
With
Disabilities
(Australia)

*Winner Australian Human Rights Award 2001
Winner National Violence Prevention Award 1999
Nominee, French Republics Human Rights Prize 2003
Nominee, UN Millennium Peace Prize for Women 2000*

**Submission to the Senate Environment, Communications, Information
Technology and the Arts Committee**
on the
Inquiry into the Telstra (Transition to Full Private ownership) Bill 2005
from
Women With Disabilities Australia

Women With Disabilities Australia (WWDA) submits the following comments to the Senate Environment, Communications, Information Technology and the Arts Committee, on the Inquiry into:

- The Telstra (Transition to Full Private Ownership) Bill 2005;
- The Telecommunications Legislation Amendment (Competition and Consumer Issues) Bill 2005;
- The provisions of the Telecommunications Legislation Amendment (Future Proofing and Other Measures) Bill 2005;
- The provisions of the Telecommunications (Carrier Licence Charges) Amendment (Industry Plans and Consumer Codes) Bill 2005, and;
- The Appropriation (Regional Telecommunications Services) Bill 2005,

but will address these comments only to the Telstra (Transition to Full Private ownership) Bill 2005.

1. The issue of the notice of the Senate Committee Inquiry on 6 September 2005, with responses required by 9 September 2005, did not give respondents sufficient time to consult with their constituents and affiliated organisations, or to make comprehensive analysis of the proposed legislation.
2. WWDA stands by comments it made in Section 4 of the WWDA Submission to the Legislation Committee for Environment, Communications, Information Technology and the Arts on the *Telstra (Transition for Full Private Ownership) Bill 2003* (September 2003).
3. The operational separation of Telstra into retail, wholesale and infrastructure sections must be done in a way that safeguards equity in access to telecommunications for all Australians.
4. WWDA supports the Telecommunications Disability Consumer Representation Position Paper on the possible sale of Telstra.
5. Consumer safeguards for people with disabilities which exist under the current Universal Service Obligation must be preserved. Of particular importance are:
 - (i.) the Disability Equipment Program (DEP). Safeguards must be in place to ensure that the equipment in the DEP is updated in a timely manner to keep pace with development of new technologies and modes of communicating. Sufficient items of

**This paper is available in large print, or taped version on request to
WOMEN WITH DISABILITIES AUSTRALIA**

WOMEN WITH DISABILITIES AUSTRALIA
PO Box 605, Rosny Park 7018 TAS
Ph: 03 62448288 Fax: 03 62448255
ABN: 23 627 650 121
Email: Women with Disabilities Australia@ozemail.com.au
Web: <http://www.Women with Disabilities Australia.org.au>

WWDA Consultant
Sue Salthouse
4 Dietrich Place, Chisholm ACT 2905
Ph: 02 6291 6842/Fax: 02 6291 3889
Mobile: 04-111-57-164
E-mail: sudata@optusnet.com.au

equipment must be maintained to meet consumer demand. People with disabilities must have access to the DEP, without additional charge, irrespective of the carriage service provider they use.

- (ii.) the Disability Enquiry Hotline (whereby information about the Disability Equipment Program is provided).
6. The additional consumer services which Telstra currently provides to people with disabilities must also be preserved. These are:
 - (i.) the Directory Assistance Helpline (whereby specially trained operators provide free detailed directory assistance to people with a disability who meet eligibility criteria that they cannot use a standards telephone directory). This service must be available, free of charge, to all eligible people irrespective of which carriage service provider they use;
 - (ii.) the provision of disability equipment display outlets must be maintained in sufficient numbers and distribution in both metropolitan and rural areas so that the distance travelled to visit a display centre is practicable. Currently displays are at most Telstra Country Wide offices and some Independent Living Centres.
 7. The units which currently within Telstra exist – the Centre for Accessibility and the Disability Services Unit - to ensure that both internal and external operations, including online services, are accessible to people with disabilities must be maintained.
 8. The role of the Australian Communications and Media Authority must be strengthened beyond the specifications in Section 8CN of the Act such that the delivery of the Customer Service Guarantee can be monitored and any compliance breaches rectified.
 9. The regulatory safeguards in the current raft of telecommunication legislation must be preserved in the Bill, so that ACMA has board powers of direction.
 10. There must be safeguards in the bill, with respect to the Customer Service Guarantee and the Universal Service Obligation, so that the needs of consumers with disabilities are met and are not traded off in favour of Telstra meeting the rights and expectations of shareholders
 11. The establishment of a perpetual \$2 billion Communications Fund must not be comprise Telstra Shares.
 12. Similarly funds must be set aside for the establishment of a Community Trust Fund to foster and maintain equity in access to telecommunications for consumers with disabilities. The programs to be funded by the Community Trust Fund would include (as set out by TEDICORE):
 - (i.) Independent Disability Equipment Program;
 - (ii.) Community Impact Analysis on the potential effect of the introduction of new technologies on people with a disability;
 - (iii.) Program to match mainstream technologies and equipment with the needs of people with a disability including necessary adaptations of these technologies to maximise usability for people with disabilities;
 - (iv.) Awareness-raising program with industry for improved understanding of the telecommunications requirements of people with a disability. This is especially timely with the planned registration of the ACIF Code on accessible phone features;
 - (v.) Discounts for people with a disability to use mobile phones and connect to broadband services in line with such subsidy programs in Japan and Korea;
 - (vi.) Research into social and technical aspects of access to telecommunications for people with a disability including user studies of new technologies; and
 - (vii.) Training and mentoring for people with a disability to be active and informed consumer representatives.