

Thursday 3 October



Craig Purdon
Project Manager
Communications Alliance
By email: c.purdon@commsalliance.com.au

Dear Craig,

Re: DR625:2019 – Information on Accessibility Features for Telephone Equipment Industry Code

ACCAN welcomes the opportunity to offer a few brief comments on Communications Alliance's draft Information on Accessibility Features for Telephone Equipment Industry Code (DR625:2019).

DR625:2019 first and foremost aims to ensure that appropriate information is provided by Equipment Suppliers to Carriage Service Providers (CSPs). It also outlines that upon receiving a request for information from a consumer, Equipment Suppliers should ensure that consumers are provided with accessible information about the features that would meet their communication needs. While DR625:2019 does not explicitly cover the distribution of information from CSPs to consumers, it is important to note that the information received by CSPs from Equipment Suppliers (as per this Code) is ultimately of benefit to consumers in their relationships with their chosen CSP. ACCAN therefore believes that it is important that the needs of consumers be kept in mind while reading DR625:2019.

In addition, ACCAN supports efforts to simplify DR625:2019 by globally aligning the features to be reported on by Equipment Suppliers. Making it more straightforward for Equipment Suppliers to meet their obligations under this Code should in theory mean that clearer and more standardised information will be available to consumers, whether this is provided by Equipment Suppliers themselves or through CSPs. As outlined in DR625:2019, however, this list of features to report on is more comprehensive than the previous Guidelines, meaning that consumers who request information from Equipment Suppliers will have access to a wider range of information. It is therefore important that the information provided to consumers (by Equipment Suppliers and CSPs alike) is easy for consumers to interpret and use. The comprehensive list of features must also be made comprehensible to consumers who are attempting to find a device that meets their communication needs. As such, ACCAN recommends that all CSPs and Equipment Suppliers use

Australian Communications Consumer Action Network (ACCAN)
Australia's peak body representing communications consumers

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and refer consumers with disability to the [Accessible Telecoms](#) website, where information about the accessibility features of a range of devices is presented in a more consumer-friendly format.

Finally, ACCAN would like to draw Communications Alliance's attention to two small errors in the current draft Code, and make a few points of clarification regarding the matrices. In section 2.1 of the draft Code there are two spelling errors within the acronym section. Firstly, for 'CAE' the text should read 'Customer Access Equipment'; and secondly, for MWF this text should read 'Mobile & Wireless Forum'.

With regard to both C625 Accessibility Features Matrix for Cordless (Home or Office) Phones and C625 Accessibility Features Matrix for Mobile Phones:

- The description in relation to the information requirement entitled 'Key Center Point Distance' should clarify that the minimum distance should be provided in millimetres, to ensure that information is provided in a standardised format and to ensure that consumers receiving a copy of this information are clear about what measurements have been provided.
- The item entitled 'Device Coupling – Other' should be positioned to come after the other Device Coupling options (Bluetooth/WLAN, Infrared and Cable) given that it references connecting via 'other connections then [sic] those described above.'
- A clarification should be made in the description for the item entitled 'Handset Weight' to specify that Equipment Suppliers are to report on this feature in grams. Given that this is an Australian Code, Australian units of measurement should be used to ensure information is as accessible as possible for Australian consumers.

Thank you again for the opportunity to provide feedback on DR625:2019. Please do not hesitate to contact ACCAN should you require further information or clarification on any of the points raised above.

Yours Sincerely,

Meredith Lea
Disability Policy Adviser