



Commission for
Communications Regulation

ICT ACCESSIBILITY WORKSHOP

13 November 2017

Novotel Budapest Danube



Agenda

- **Decisions following Consultations undertaken**
 - Accessible Services
 - Accessible Information
 - Accessibility Statement
- **Consultation currently underway**
 - Complaints Handling and information on the website
- **Stakeholder Meetings**
- **Next Steps / Challenges**



Decisions following Consultations to ensure Equivalence of Access and Choice

❖ The decisions are as follows:

- ❖ Electronic Communications: Measures to Ensure Equivalence in Access and Choice for Disabled End-Users. Document Reference, ComReg 14/52 D04/14
- ❖ Measures for disabled end-users: Requirement for an Accessibility Statement. Document Reference, ComReg 15/98 D06/15
- ❖ Electronic Communications: Provision of Access to a Text Relay Service. Document Reference, ComReg 15/143 D09/15.

Measures to Ensure Equivalence in Access and Choice for Disabled End-Users.



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➤ Accessible Services

- Accessible Complaints Procedures
- Accessible Top-Up Facility for Pre-Paid Mobile Users
- Accessible Directory Enquiries
- Accessible Billing
- Accessible Facility to Test Compatibility of Terminal Equipment or Appropriate Returns Policy



➤ Accessible Information

- Accessible Website information
- Accessible Contract information
- Accessible information on Code of Practice for Complaints Handling



www.comreg.ie



Accessible Services – Nov 2014

Accessible Complaints Procedure

- Accessible process to lodge a complaint and/or make an enquiry
- To nominate third party to handle complaints

- Implement disability awareness training to ensure staff are trained to appropriately deal with the requirements of disabled end-users





Accessible Services – Nov 2014

Directory Enquiry

- For Subscribers unable to use phone book because of vision impairment or have difficulty reading the phone book, special Directory Enquiry Arrangements so long as a printed directory is a requirement of the USO & certification provided

Accessible Billing

- Bills issued to disabled end-users should be in an accessible medium to suit needs of disabled end-user





Accessible Services – Nov 2014



❖ **Test Compatibility of Terminal Equipment (Handsets)**

- ❖ Service providers selling terminal equipment to make available
- ❖ a test facility for disabled end-users who use a hearing aid or have a cochlear implant to test terminal equipment at the service provider's retail shops in advance of purchasing the terminal equipment;

'Or'

- ❖ Appropriate returns policy



Accessible Services – Feb 2015

Accessible Top-Up Facility for Pre-Paid Mobile that allows

- Top up using cash without the need to follow voice prompts
- Get a receipt (voucher) that lists in clear, easy to understand language the steps required to ensure the top-up credit can be applied successfully;
- Apply the top-up receipt (voucher) by SMS sent from the disabled end-user's mobile telephone and without assistance from a third party; and
- Receive confirmation of the value of the top-up credit by SMS sent to the disabled end-user's mobile telephone.





Accessible Information – Feb 2015

Information regarding products and services is accessible for disabled end-users

- ❖ Web Accessibility Initiative to be met to facilitate
 - ❖ One Click access from home page
 - ❖ Information in relation to product and services of interest to people with disabilities
- ❖ Accessible information in respect of switching contracts and notification of modifications
- ❖ Information regarding Operator code of practice for complaints handling





Facility For Disabled Subscribers to Register Requirements- *Feb 2015*

- ❖ **Service provider to set up and maintain a facility to enable disabled subscribers to register their requirements, subject to consent of each disabled subscriber**
- ❖ Name, Address, contact details, Third party nominated contact
- ❖ Preferred means of communications, bundle, billing preferences etc.
- ❖ Any special Terminal Equipment required





Accessibility Statement – *Jan 2016*

- ❖ **All service providers are required to publish an Accessibility Statement on their websites. The Accessibility Statement should contain:**
 - ❖ Information about the accessibility products and services available to its customers, and
 - ❖ Information about the range of accessible contact methods and details to assist disabled end-users, and
 - ❖ The approach and policy in providing accessible services and information to disabled end-users.
 - ❖ Statement regarding Operator's participation at ComReg Forum
 - ❖ Date the accessibility statement was last published



Provision of Access to TRS May 2017

Service Providers with more than 100k subscribers are now obliged to offer a text relay service to ensure consumers have equivalent access and choice (ComReg 15/143 D09/15)

- The Irish Text Relay Service (ITRS) translates text into voice and voice into text to facilitate a person with a hearing disability in making and receiving calls in the Republic of Ireland. Calls are relayed through ITRS agents who perform this translation.
- The service is available 24 hours a day.
- ITRS RS app from the iOS App Store and the Android Google Play Store customers can make and receive text relay calls through a range of devices including PCs and/or mobile media devices. The new service is a supplement to the existing Minicom service.
- The user downloads the IT
- The user then registers – providing details of consumer's phone number
- The user then received confirmation that registration was successful and they can now proceed to use the phone number to interact with the ITRS



ComReg's Forum on Electronic Communications Services for People with Disabilities

2005 – 2015 - Forum

2016 Workshops – To Date

- ❖ Focused on Topics
 - ❖ Meeting No1. (June 2016)
 - ❖ Accessible Complaints procedures
 - ❖ Meeting No 2 (Oct 2016)
 - ❖ Website accessibility
 - ❖ Meeting No 3. (March 2017)
 - ❖ Disability Register
 - ❖ Meeting No 4 (Sep 2017)
 - ❖ Irish Text Relay Service
- ❖ Members from a wide variety of Consumer Groups, including those with hidden disabilities, and student representatives,
- ❖ Representatives of the electronic communications sector, both fixed and mobile service providers





Consultation Underway ComReg 17/74

Consultation issued Sep 2017

- **Accessible Services – complaints handling**
- **Accessible Information**
- **Disability Register**

7 Response Rec'd Oct 2017

Decision due Dec 2017



Next Steps / Challenges

- ❖ **Identifying equivalence issues**
- ❖ **Inputs from disabled end-users**
- ❖ **Informing Consumers of entitlements**
(<https://www.comreg.ie/accessibility/>)
- ❖ **Statistical information**





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Questions



ComReg's Forum on Electronic Communications Services for People with Disabilities

2005 -2015

- Initially focused on voluntary measures
- After introduction of Article 23a the Forum assisted ComReg in identifying issues and developing mandated measures
- Representatives of the disability sector in Ireland to include the National Disability Authority (NDA); People with Disabilities in Ireland (PWDI); the Disability Federation of Ireland (DFI); the Not for Profit Business Association; the Irish Mental Health Coalition, and the Federation of Voluntary Bodies,
- Representatives of the electronic communications sector, both fixed and mobile service providers
- The Department of Communications, Climate Action & Environment – Formerly (DCENR)





ComReg's Forum on Electronic Communications Services for People with Disabilities

2005 -2015

- ◆ Surveys / Mystery Shopping
 - ◆ 2007 - ComReg Document No 07/78 - Research on the experiences of electronic communications services by users with disabilities
 - ◆ 2010 Survey of Users with Disabilities
- ◆ CEO Breakfast Briefing
- ◆ Disability Awareness Training
- ◆ Presentation on the Global Accessibility Reporting Initiative (GARI)
<http://www.gari.info/>
- ◆ Next Generation Text Relay Service (TRS) –BT UK presented their solution to the group in advance of ComReg undertaking a consultation on TRS
- ◆ Web Accessibility Workshop facilitated by expert to explain differences in A, AA and AAA Standards