



**Mobile Phone Industry Good Practice Guide:
Accessibility for People with Disabilities**

Table of Contents

1. Overview	3
2. Scope of the Guide	3
2.1 Thrust of the Guide	3
2.2 Who will Use the Guide	4
2.3 Effectiveness of the Guide	4
2.4 The Guide and the ACIF Code and Guideline	5
2.5 Consultation on Development of the Guide	5
3. Stakeholder Engagement	5
3.1 Suggested Activities for Individual AMTA Members	6
4. Publicising Product and Service Information	6
4.1 Suggested Activities for Individual AMTA Members	6
5. Customer Access	6
5.1 Suggested Activities for Individual AMTA Members	6
6. Sales	7
6.1 Suggested Activities for Individual AMTA Members	8
7. Billing and After-Sales Service	8
7.1 Suggested Activities for Individual AMTA Members	8
8. Complaints Handling	8
8.1 Suggested Activities for Individual AMTA Members	9
9. Staff Training	9
9.1 Suggested Activities for Individual AMTA Members	9
10. Catering for Individual Needs	10
10.1 Suggested Activities for Individual AMTA Members	10
11. Customers who are Deaf or have a Hearing Impairment	10
11.1 Suggested Activities for Individual AMTA Members	10
12. Customers who are Blind or have a Vision Impairment	11
12.1 Suggested Activities for Individual AMTA Members	11
13. Customers with a Physical Disability	11
13.1 Suggested Activities for Individual AMTA Members	11
14. Customers with Intellectual Disabilities	11
14.1 Suggested Activities for Individual AMTA Members	11
15. Customers with a Speech Impairment	12
15.1 Suggested Activities for Individual AMTA Members	12
16. Technology and Innovation	12
16.1 Suggested Activities for Individual AMTA Members	13
17. Some Useful Website Links	13
18. To Comment on this Guide	13
19. Acknowledgments	14

1. Overview

This Good Practice Guide has been designed by AMTA to encourage and assist Australia's mobile telecommunications industry¹, to enhance and develop, on a continuing basis, the accessibility of its products and services to people with disabilities. Recognising that many aspects of mobile telephony already offer benefits to people with disabilities, and although the Australian industry enjoys only a limited capacity to influence equipment design and availability, our aim is to foster innovation in these areas where possible.

According to a survey by the Australian Bureau of Statistics in 2003, about 4 million Australians reported some kind of disability, with 5.9% of all Australians reporting a profound or severe limitation on core activity.

Typically, people with disabilities who are likely to experience difficulties with communications are those with one or more of the following:

- ◆ Deafness or a hearing impairment;
- ◆ A mobility impairment;
- ◆ A dexterity impairment;
- ◆ Blindness or a vision impairment;
- ◆ A speech impairment or communications disability; and/or
- ◆ An intellectual disability.

Some people may develop single or multiple disabilities as a result of progressive illnesses or age-related conditions. Others may experience temporary disabilities resulting from traumas such as injury or surgery.

These are broad segmentations only: a customised approach for each customer (wherever possible) is most appropriate. Note that not all people with disabilities will mention or demonstrate a disability when seeking service. Some people may not acknowledge that they have a disability.

This Guide, therefore, should be used in the context of the above broad segmentation, noting also that customers may have single or multiple impairment, acquired impairment, or temporary impairment.

2. Scope of the Guide

2.1 Thrust of the Guide

- ◆ The Guide emphasises capabilities rather than specific products. It is both inevitable and desirable that industry members should offer a range of services to meet the needs of people with disabilities in distinctive ways.
- ◆ Through a commitment to developing capabilities, the competitive forces, which have provided significant public benefit in other areas of the industry, will also benefit people with

¹ Industry members include network operators, carriage service providers, handset suppliers, and retailers.

disabilities, so that they can choose the services, equipment and providers that best meet their needs.

2.2 Who will Use the Guide

- ◆ Retailers of Services and Equipment – the most likely first points of contact in the industry for people with disabilities. The Guide primarily seeks to provide retailers with general principles and a range of suggested activities that will assist them to develop strategies to address the particular needs of customers with disabilities. The suggested activities cover areas such as customer information, sales, complaint handling and staff training.
- ◆ Other Industry Members – Handset suppliers in particular will find the Guide useful in terms of understanding the needs of people with disabilities, and in their dealings with retailers and manufacturers. In this regard, the Guide seeks to encourage and foster innovation in the design and manufacture of products and the development of services.

2.3 Effectiveness of the Guide

- ◆ The Guide is based on inclusive design principles and in the context of the Disability Discrimination Act 1992 (Cwth).
- ◆ The Guide may assist industry members wishing to develop a Disability Action Plan, as described in section 61 of the Disability Discrimination Act 1992 (Cwth)², or to undertake some activities as a precursor to formally developing such a Plan. This involves developing a policy on the provision of goods, facilities and services that promotes equitable access to products and services for people with disabilities.
- ◆ Recognising that manufacturers, in the main, are located outside Australia, the Guide may assist industry members, particularly suppliers, to influence the development of mobile phone design features, and international industry practices and policies.
- ◆ The use of the Guide in the development of and innovation in products and services may benefit a broader range of customers than those with disabilities. For example, if more handsets have

² Section 61 of the *Disability Discrimination Act 1992* (Cwth) provides as follows:

The action plan of a service provider must include provisions relating to:

- (a) the devising of policies and programs to achieve the objects of this Act; and
- (b) the communication of these policies and programs to persons within the service provider; and
- (c) the review of practices within the service provider with a view to the identification of any discriminatory practices; and
- (d) the setting of goals and targets, where these may reasonably be determined against which the success of the plan in achieving the objects of the Act may be assessed; and
- (e) the means, other than those referred to in paragraph (d), of evaluating the policies and programs referred to in paragraph (a); and
- (f) the appointment of persons within the service provider to implement the provisions referred to in paragraphs (a) to (e) (inclusive).

Further information and assistance is available from the Human Rights and Equal Opportunity Commission (HREOC).

good volume control for people with hearing impairments, this benefits people in noisy environments. Large keys on handsets not only can assist people with vision, dexterity or mobility impairment, but also can benefit people who may be wearing gloves or have large hands.

2.4 The Guide and the ACIF Code and Guideline³

- ◆ The Australian Communications Industry Forum (ACIF) through its Customer Equipment and Cable Reference Panel (CECRP) Working Committee 19, is developing an industry Code and Guideline for the provision of accessibility information on telephone equipment (see footnote).
- ◆ AMTA has noted the terms of the reference for the Committee, and looks forward to the outcomes of the Committee's deliberations.
- ◆ Other ACIF Codes and Guidelines⁴ provide further useful guidance on service delivery for all customers, including those with disabilities.

2.5 Consultation on Development of the Guide

- ◆ A range of key stakeholder groups representing the interests of people with disabilities were invited to provide comment and input to this Guide. AMTA thanks these groups for their valuable support, and would welcome their continuing participation as this Guide is reviewed and updated whenever appropriate in the light of the developing experience of our members. See "Acknowledgments" for people and organisations who contributed to this Guide.
- ◆ AMTA intends to survey its members regularly to ascertain industry progress in using the Guide to enhance product and service accessibility for people with disabilities.

3. Stakeholder Engagement

AMTA has developed this Guide in consultation with members of the Industry, and organisations representing people with disabilities. In developing and reviewing their corporate plans, policies and practices to improve accessibility for people with disabilities, AMTA members may wish to seek feedback

³ Draft ACIF Code 625:2004 – *Accessibility Feature Information for Telephone Equipment*
Draft ACIF Guideline Gxxx:2004 – *Accessibility Guideline*

In the event the Australian Communications Authority registers the Code and Guideline, it will be binding on importers and suppliers. AMTA will review the Good Practice Guide and its relationship to the Code and Guideline at that time.

⁴ ACIF Guideline G586:2001 – *Access to Telecommunications for People with Disabilities*
ACIF Code S040:2001 (Australian Standard) – *Requirements for Customer Equipment for use with the Standard Telephone Service – Features for special needs of persons with disabilities*
ACIF Code C541:2003 – *Credit Management*
ACIF Code C521:2004 – *Customer Information on Prices, Terms and Conditions*
ACIF Code C547:2004 – *Complaint Handling*
ACIF Code C620:2005 – *Consumer Contracts*

through established forums as well as from the outcomes of other consultations conducted by AMTA.

3.1 Suggested Activities for Individual AMTA Members

- ◆ Identify issues which may require consultation with organisations representing people with disabilities, those representing families, carers and older people, as well as other stakeholders and consider a consultation program defining objectives and commitments.
- ◆ Establish a stakeholder engagement program to develop or review a Disability Action Plan, drawing also on this Good Practice Guide.
- ◆ Consider ways of gaining feedback through regular forums involving organisations representing people with disabilities.
- ◆ Establish a dedicated contact point within the organisation to enable direct engagement with organisations representing people with disabilities.

4. Publicising Product and Service Information

Industry members may want to promote their range of products and services suitable for people with disabilities.

4.1 Suggested Activities for Individual AMTA Members

- ◆ Advertise products and services in specialist and mainstream publications, including those of national organisations that represent people with disabilities, as well as appropriate government agencies and professional bodies.
- ◆ Inform customers with disabilities of the range of specialist products and services suitable for their use.
- ◆ Provide information about products and services in plain English and in alternative formats, for example, Braille, large print, electronic or audio formats, or on an accessible website.

5. Customer Access

Convenient and effective contact, access and advice facilities and resources are important considerations for customers with disabilities when dealing with existing or potential service providers.

5.1 Suggested Activities for Individual AMTA Members

- ◆ Consider how customers with disabilities are able to make contact on a pre-sales basis to discuss a mobile service, how they will buy the service, how they will obtain support in using the service after purchase and how any access issues can be overcome.

- ◆ Consider access for TTY users by ensuring internal awareness of the National Relay Service⁵ and/or considering the provision of direct TTY access to Customer Service and/or Sales areas.
- ◆ Consider or review facilities to identify and address any barriers for customers with a hearing impairment wishing to discuss their needs effectively in a retail environment; eg in a suitably quiet area of retail premises, a facility for taking and exchanging notes, or through in-shop equipment such as an audio induction loop.
- ◆ Consider the need for privacy for customers who do not wish to discuss their disabilities in an open, public environment.
- ◆ Endeavour to offer customers with disabilities a range of methods to communicate effectively with telesales and customer care functions; eg SMS, text phone (TTY), e-mail or web-based form and fax.
- ◆ Make information available about products and services offered in a choice of alternative formats; eg by providing information in an electronic format so that a customer who is blind can use assistive text to speech software.
- ◆ Ensure web sites are designed to be accessible to customers who use assistive technologies such as screen readers by utilising World Wide Web Consortium (W3C) guidelines for disability access (see <http://www.w3.org/WAI> for information).
- ◆ Wherever possible, use internationally recognised disability signage; eg, the eye symbol to indicate aids are available for people who are blind or have vision impairment, ear symbol with a T to show that an audio induction loop is installed in a retail shop and a wheelchair symbol to indicate that ramped or level access is available at a retail store.
- ◆ Wherever possible, use suitable furniture, lighting, colour, acoustic environment and signage to improve access for customers with disabilities.

6. Sales

All customers, including those with disabilities, appreciate being able to use a range of alternative channels, eg retail shops, call centres, the Internet, and direct sales telephone lines to purchase equipment, accessories and services.

Sales of some mobile phones require customers to commit to a contract. All customers need to be satisfied they understand the contract terms and conditions before making a commitment. However, providers should be alert

⁵ The National Relay Service (NRS) is a telephone access service available to all Australians. People who have a hearing or speech impairment or are Deaf and anyone who uses a teletypewriter (TTY) or a computer with a modem, can access anyone in the wider telephone network through the NRS. Similarly, the NRS can be used by anyone in the community to communicate with those who are Deaf, or have a hearing or speech impairment using the standard telephone service. For more information visit [www.dcita.gov.au/tel/access for people with disabilities/national relay service](http://www.dcita.gov.au/tel/access%20for%20people%20with%20disabilities/national%20relay%20service).

to any additional assistance that customers with disabilities may require to ensure they fully understand the contract terms and conditions. For example, they may need a staff member to read the contract to them.

6.1 Suggested Activities for Individual AMTA Members

- ◆ Review availability of sales and contract documentation regarding mobile phone use in alternative formats on request; e.g. provide it in soft copy, in large print or Braille formats for people with a vision impairment.
- ◆ Consider the development of targeted pricing packages to suit specific disability segments and/or identify existing pricing packages which may be relevant to specific disability segments.
- ◆ Offer customers with disabilities the opportunity to try new services or terminals, for example by provision of demonstration facilities in shops, and consider offering a trial period for handsets on a sale or return basis.
- ◆ Consider ways of identifying individual customer requirements sensitively, whilst maintaining privacy principles.

7. Billing and After-Sales Service

Important considerations for customers with disabilities, in relation to billing matters, include the convenience and accessibility of different bill payment methods, as well as their ability to access billing information. Customers with vision impairment, for example, should be able to access their billing information without recourse to a support person.

7.1 Suggested Activities for Individual AMTA Members

- ◆ Undertake targeted communications to ensure customers with disabilities are aware of initiatives which may assist them, such as billing information in alternative formats.
- ◆ Consider the promotion of appropriate payment mechanisms to enable customers with disabilities to top-up pre-paid mobiles, or pay for their phone services automatically (e.g. by direct debit or credit card), or pay their bills in instalments during their bill period.
- ◆ With customers' agreement on an 'opt-in' basis and in accordance with privacy obligations maintain an up-to-date record for customer service purposes of the customers' accessibility-related requirements including preferred contact method and preferred format for receiving billing information, service information and any direct marketing literature.

8. Complaints Handling

Customer feedback is a valuable source of information. Service providers increasingly are acknowledging the importance of capturing and analysing this

feedback. Complaint handling processes must take into account the needs of customers with disabilities and ensure that they are able to access complaint handling mechanisms, while being consistent with existing complaint handling mechanisms available generally to telecommunication consumers, including the Telecommunications Industry Ombudsman.

8.1 Suggested Activities for Individual AMTA Members

- ◆ Review whether adequate procedures are in place for dealing with complaints and resolving disputes regarding services provided, including existing complaint handling processes. For example, is there a range of access methods for customers with disabilities or their representatives to lodge complaints effectively and appropriately (for example by TTY, email or fax).
- ◆ Regularly review complaints data to capture and analyse accessibility-related complaints.

9. Staff Training

Staff skills and sensitivity are particularly important factors when providing assistance and access to equipment and services suitable for customers with disabilities.

Customer service staff should generally be aware of the communication difficulties and equipment needs of customers across a range of disability segments. They (or specialist staff to whom customers can readily be referred) should also know the range of ways in which mobile services can be made available, the range of features and accessories which may assist customers with disabilities, and how to clearly communicate details of these to customers.

Ideally, this will allow customers with disabilities to make informed choices about the most appropriate products and services and to set up and use their mobile services effectively.

9.1 Suggested Activities for Individual AMTA Members

- ◆ Develop disability awareness training for staff in contact with the public. Training should cover a broad range of disabilities and be updated as necessary. Industry members can seek assistance and advice from AMTA or organisations representing people with disabilities should they require it.
- ◆ Assist customer service staff to acquire and maintain a good understanding of the range of features, specialist equipment and accessories which may improve the accessibility of handsets and services for customers with disabilities.
- ◆ Assist customer service staff to acquire and maintain good communication strategies which may assist their interaction with customers with disabilities.
- ◆ Assist staff to identify existing product offerings which may be relevant to customers with specific disabilities.

10. Catering for Individual Needs

By periodically reviewing the availability and suitability of mobile products, features and services, AMTA members may optimise their capacity to attract, assist and retain customers with disabilities. However, almost all mobile handsets and other accessibility-related equipment are imported into Australia. Accordingly, AMTA members have limited influence in the design of handset features.

The lists of suggested activities outlined below for individual AMTA members are necessarily limited also by equipment and accessory availability from manufacturers, and may also be influenced by their overall business plan.

The form and severity of disabilities vary greatly between individuals, and individuals can have more than one disability. Providers should keep in mind that a solution that works for one person may not be appropriate for another person. Given this, many customers with disabilities appreciate the opportunity to trial equipment and accessories prior to purchase.

10.1 Suggested Activities for Individual AMTA Members

- ◆ Periodically review mobile phone products and test their availability and suitability for customers with disabilities.
- ◆ Establish a handset loan program for organisations representing people with disabilities, as well as those representing carers and older people, recognising that many of these organisations have only limited resources for co-ordinating such programs.

11. Customers who are Deaf or have a Hearing Impairment

The rapid growth in text and picture messaging (Short Messaging Services - SMS and Multimedia Messaging Services - MMS) and WAP (Wireless Application Protocol) services, including e-mail and chat, as well as 3G video communications provides new opportunities for meeting the needs of Deaf people and people with hearing impairments.

However, it is important to recognise that, while many of these technologies, such as SMS and MMS, are revolutionary in mobile phone innovation, they do not provide “real-time” communication. Customers who require real-time communication but are unable to access that technology due to a disability such as Deafness or hearing impairment may be at a disadvantage.

11.1 Suggested Activities for Individual AMTA Members

Consider the provision of an appropriate range of mobile equipment for people with hearing impairments that:

- ◆ has high quality, adjustable audio;
- ◆ is technically compatible and able to be used with hearing aids;
- ◆ contains adjustable output amplification (i.e. volume control for speech);
- ◆ can be customised to offer loud and/or vibration ringing and alert functions;

- ◆ is compatible with suitable portable keyboards; and
- ◆ contains a predictive text messaging facility.

12. Customers who are Blind or have a Vision Impairment

12.1 Suggested Activities for Individual AMTA Members

Consider the provision of an appropriate range of mobile equipment that:

- ◆ offers voice activated dialling;
- ◆ offers larger fonts, larger screens and screen contrast adjustment;
- ◆ contains keyboard navigation points such as a raised dot or dots on or around the number '5';
- ◆ offers speech output;
- ◆ is compatible with speech output software; and
- ◆ contains menu functions which do not scroll continuously.

13. Customers with a Physical Disability

This would include customers who have reduced grip, limited upper body mobility or limited manual dexterity.

13.1 Suggested Activities for Individual AMTA Members

Consider the provision of an appropriate range of mobile equipment that:

- ◆ offers voice activated dialling;
- ◆ offers speed / short code dialling;
- ◆ contains predictive text messaging functionality;
- ◆ is compatible with portable keyboard accessories;
- ◆ is easy to grip; and
- ◆ is compatible with hands-free accessories.

14. Customers with Intellectual Disabilities

Customers with intellectual disabilities tend to have difficulties with complex processes and complex information. The complexity of some mobile handsets and services can represent barriers to use, especially for customers with learning disabilities.

14.1 Suggested Activities for Individual AMTA Members

- ◆ Review availability of documentation regarding mobile phones in clear print and plain language using short sentences and with key points made separately.

- ◆ Illustrations are very helpful, particularly for customers with intellectual disabilities, for communicating information about the features and functions of mobile phones.
- ◆ Consider the provision of an appropriate range of mobile equipment that provides basic, intuitive functions with simple on-screen step-by-step instructions.

15. Customers with a Speech Impairment

15.1 Suggested Activities for Individual AMTA Members

Consider the provision of an appropriate range of mobile equipment that:

- ◆ enables communication in real-time, albeit often needing more time than would be the case if speech were used;
- ◆ offers AT (Attention) Commands for communication with external devices;
- ◆ is compatible with suitable portable keyboards; and
- ◆ contains a predictive text messaging facility.

16. Technology and Innovation

Mobile phone technology and innovation, as with any IT product, continues to develop apace; constantly meeting and anticipating new opportunities and consumer needs.

In addition, technology in relation to mobile phone accessories and add-ons is ever changing and advancing.

Although much of this development occurs overseas industry members in Australia can advocate advances in technology, particularly in response to feedback from customers.

Industry members must stay abreast of advancements in design features and functions to ensure they can keep customers informed of new mobile phone capabilities, including customers with disabilities and older customers, who may require specific features and functions.

Even while all of this advancement continues, existing technologies can still be used widely, with the inherent risk of those technologies becoming obsolete or incompatible with newer technologies.

Therefore, in addition to keeping up with the new technologies, industry members must maintain knowledge about existing technologies to be able to provide well-informed advice to all customers, including those with disabilities, who may require specific features, functions and services.

These features and functions include, but are not limited to, the following:

- ◆ Short Messaging Services (SMS);
- ◆ Multimedia Messaging Services (MMS);

- ◆ Email services;
- ◆ World-Wide Web services;
- ◆ Text Telephony (TTY) and associated text servers;
- ◆ Voice over Internet Protocol (VoIP);
- ◆ Video Conferencing;
- ◆ Screen-reading software;
- ◆ Portable keyboards;
- ◆ Digital Personal Assistants (DPA); and
- ◆ Augmentative and Alternative Communication (AAC) devices and their interaction with mobile phone equipment.

16.1 Suggested Activities for Individual AMTA Members

- ◆ Provide customers with accessible mechanisms that encourage feedback and suggestions, not only on product features and functions, but also on accessories and add-ons, including 3rd party products and services;
- ◆ Provide continuing awareness training to customer service and sales staff on all available technologies, both existing and new; and
- ◆ Develop pro-active strategies to provide input to product and service designers and manufacturers.

17. Some Useful Website Links

AMTA - <http://www.amta.org.au> - Includes links to AMTA's Disability Access web page, as well as links to accessibility web pages maintained by industry members.

Australian Communications Industry Forum (ACIF) -
<http://www.acif.org.au/publications/codes> - ACIF Industry Codes

COST219ter - European Commission project: "Accessibility for All to Services and Terminals for Next Generation Networks" - <http://www.cost219.org>

National Relay Service -
www.dcita.gov.au/tel/access_for_people_with_disabilities/national_relay_service

Telecommunications & Disability Consumer Representation (TEDICORE) -
<http://www.bca.org.au/tedicore/tedicore.htm>

The Wireless Association -
http://www.accesswireless.org/product/consumer_access_guides.htm -
accessibility website

World Wide Web Consortium (W3C) - <http://www.w3.org/WAI> - Guidelines for disability access

18. To Comment on this Guide

Comments on this Guide are welcome from mobile phone industry members, and people with disabilities and their representative organisations.

Please write to:

Australian Mobile Telecommunications Association
PO Box 4309
Manuka ACT 2603
Phone: (02) 6239 6555
Web: www.amta.org.au

19. Acknowledgments

AMTA particularly thanks TEDICORE (Telecommunications and Disability Consumer Representation) and Gunela Astbrink for their detailed work, on behalf of the Disability Advisory Body of the Australian Communications Industry Forum (“DAB”), in collecting and reporting comments from all major national organisations representing people with disabilities. Gunela participated as an adviser to AMTA’s Accessibility Committee.

The DAB’s members are:

- ◆ Australian Association of the Deaf
- ◆ Blind Citizens Australia
- ◆ Communication Aid Users Society
- ◆ Deafness Forum of Australia
- ◆ National Council on Intellectual Disability
- ◆ Physical Disability Council of Australia
- ◆ Novitatech Regency Park
- ◆ TEDICORE
- ◆ Women with Disabilities Australia