

Chime Submission
to
ComReg's Call for Inputs
on

**Review of Measures to ensure equivalent access to
choice of Electronic Communications Services (ECS)
for end-users with Disabilities**

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Introduction

Chime is the National Charity for Deaf and Hard of Hearing people. Chime was founded in 1964 and is dedicated to a society where deafness or hearing loss does not limit individual potential, personal choice or quality of life. Chime works to achieve this through advocating for a more accessible and inclusive society and providing a range of personal support services for Deaf and Hard of Hearing people. Chime's services entail a holistic approach, addressing the person's social, technological and emotional needs.

A significant portion of the population is affected by deafness or hearing loss. Approximately 200 children are diagnosed each year with hearing loss, with the majority diagnosed within a few months of birth. The Deaf community has approximately 5,000 members whose primary language is Irish Sign Language (ISL). Those who have acquired a hearing loss in adulthood are a much larger group. The HSE estimates that 8% of all adults (approximately 300,000 people) have a moderate or greater hearing loss and require audiological support. The prevalence of hearing loss increases greatly in later life, so that by the age of 70 approximately 50% of the population have acquired a significant hearing loss.

Chime welcomes ComReg's Call for Inputs on the Review of Measures to ensure equivalent access to and choice of Electronic Communications Services (ECS), as these Measures enable many Deaf and Hard of Hearing people to not only access ECS services, but to live their lives with increased independence and empowerment – as envisaged by the UNCRPD which has now been adopted by the Irish government.

The format of this submission addresses the questions posed by ComReg in their Call for Inputs document (ComReg 23/80). We also use the term 'provider' within this submission when referring to ECS service providers.

Section 1: Trends and developments

Q. 1 (A) Do you have any comments on the trends and developments set out above? (B) Do you have any comments on the impact of trends and developments on accessing and using ECS services and related information for people with disabilities.

Chime largely agrees with the narrative as set out by ComReg and notes that people have more access to and depend more on technology. This makes it all the more important that people with disabilities, including Deaf and Hard of Hearing people, have "choice and equivalent access" to electronic communications (ECS).

Q. 2 Are you aware of any market-led or technical developments to help people with disabilities access and use ECS services and related information? Please give details in your answer, if possible.

In the past few months Chime has become aware of a 'Live Captions' feature that is available on Apple 11 iPhones onwards. This feature provides a very high quality real-time translation from voice to text when using the smart device for a variety of functions, e.g.

watching a video or making a phone call. Currently the 'Live Captions' feature is only available on iPhones 11 and later models and is only available in a 'US English' version – but this quality of voice to text feature has the potential in future to enable people who currently can't make phone calls due to hearing loss, to do so independently if this becomes a standard feature on smart devices.

Section 2: Review of the Measures: Accessible Complaints Procedure

Q. 3 Do you agree that the Measure 'accessible complaints procedure' is needed to make sure people with disabilities have access to customer services and complaints procedures (to make a complaint or an enquiry)?

Yes. Generally it is quite difficult and time-consuming for anyone to make a complaint. Also, the various providers have differing and complex complaints processes that are typically merged into their general customer query channels. Also, we couldn't find a provider that explains their complaints procedures in ISL.

Q. 4 Are there changes which should be made to the Measure 'accessible complaints procedure'?

Yes. Providers should be required to "have a specific service available to support end-users with disabilities access customer services and complaints procedures, equivalent to that experienced by most end-users" (Page 34, ComReg 23/80). Given the range of challenges that people with disabilities face in accessing services generally, this measure is necessary in our view. We also believe that this Measure is either not in place or not displayed prominently on many provider websites.

Section 3: Review of the Measures: Accessible Directory Enquiries

Q. 5 Do you agree that the Measure 'accessible directory enquiries' (196 service) is needed to give people with disabilities access to a directory of subscribers or directory information services?

Chime agrees that this measure is needed by people who are blind or have visual impairment, as without it, some people would not have equivalent access to ECS.

Q. 6 Are there changes that should be made to the Measure 'accessible directory enquiries' (196 service) Measure?

Chime is not in a position to provide an informed opinion on this question.

Section 4: Review of the Measures: Accessible top-up facility

Q. 7 Do you agree that the Measure 'accessible top-up facility for pre-paid mobile users' is needed to give people with disabilities access to mobile services?

Yes. Without this measure many Deaf and Hard of Hearing people who use pre-paid phones could not upload pre-paid credit independently.

Q. 8 Are there changes that should be made to the accessible top-up facility for pre-paid mobile users Measure?

Chime currently no changes to propose on this measure.

Section 5: Review of the Measures: Accessible Billing

Q. 9 Do you agree that the Measure 'Accessible Billing' is required to facilitate end-users with disabilities access their bills and related information?

Yes. This measure is required to ensure people with disabilities can access their billing details on an equivalent basis.

Q. 10 Are there changes that should be made to the Measure 'Accessible Billing'?

Chime currently has no changes to propose to the current measure.

Section 6: Review of the Measures: Facility to Test Terminal Equipment

Q. 11 Do you agree that the Measure 'Facility to Test Compatibility of Terminal Equipment or Appropriate Returns Policy' to facilitate end-users with Call for Inputs – Review of the Measures for end-users with disabilities ComReg 20/80.

Yes. Many phones are not compatible with hearing aids or cochlear implants, so this measure is essential for Deaf and Hard of Hearing people who use such technology when they are purchasing phones.

Q. 12 Are there changes that should be made to the Measure 'Facility to Test Compatibility of Terminal Equipment or Appropriate Returns Policy'?

Chime does not currently have any proposed changes to make in regard to this measure.

Section 7: Review of the Measures: facility to register requirements.

Q. 13 Do you agree that the ‘facility for customers with disabilities to register requirements with their service provider’ is needed to support customers with disabilities: (a) when choosing and using ECS and, (b) when dealing with their service provider?

Yes. While measures should exist to enable as many people as possible to access services independently, this measure is important for people who may struggle to look after their own affairs, such as those with intellectual challenges or cognitive decline through ageing.

Q. 14 Are there changes which should be made to the Measure ‘facility for customers with disabilities to register their requirements with their service provider’?

Yes. Chime believes that many people who could benefit from this service are not aware of it. Chime believes that service providers should be required to inform customers directly of this facility every year or bi-annually, so that they can avail of it if their circumstances change over time.

Section 8: Review of the Measures: Text Relay Services

Q. 15 Do you agree that the Measure ‘Text Relay Service’ is needed so people with disabilities can access ECS?

Yes, Chime agrees with ComReg that “this measure supports end-users with disabilities to have access and choice concerning ECS and services, the same as those without disabilities” (ComReg 23/80)

Q. 16 Are there changes which should be made to the Measure ‘Text Relay Service’?

Yes. While this Measure currently provides a level of access and choice, it does not do so on an equivalent basis, as it is only available for certain hours, i.e. less than 50% of the time. Chime believes that this Measure should be available 24/7 in order to provide equivalent access. It is a measure that is not only beneficial to users for planned use, but also in unplanned or crisis situations, e.g. contacting a relative in an emergency.

There are also still some ongoing issues with the quality of the Text Relay Service which Chime has outlined to ComReg and other stakeholders on many previous occasions.

Section 9: Review of the Measures: Accessible Information

Q. 17 Do you agree that the Measure ‘Accessible Information’ is needed to facilitate all end-users with disabilities access to information on ECS products and services (i.e., access to key information, in an accessible format and through appropriate channels)?

Yes, as many people with disabilities are unaware of the Accessibility Measures that should be in place.

Q. 18 Are there changes that should be made to the Measure 'Accessible Information' ?

The primary change that is required in this matter is that there is robust auditing of the provision of Telecoms in this regard. While Chime is not an expert on website accessibility or the Measures that should be in place, in Chime's opinion only one of the 'Big 3' providers could be considered to be in compliance with the 'Accessible Information' Measure.

Our 'mini-audit' examined two aspects of this measure: one-click access from the homepage to the 'Disability Section' of the website (if it even existed!), and information on services that are required under the Measures to Ensure Equivalence, namely the facility to test terminal equipment. In our view none of the three big telecom providers conformed fully with these two aspects of the Measures, and in one case we could not locate any accessibility statement.

Furthermore, we could find no information on Accessible Information on any of these provider's websites in ISL, which means that current arrangements under 'alternative formats' does not "ensure that all customers are able to access required information in a format that is suitable for them", e.g. Deaf people.

Given that ISL is now Ireland's third official language, that it is essential for Deaf people to be able to access information and services, and that equivalent access to information for Deaf people can only be ensured through ISL, we believe that information in ISL should be required under accessible information arrangements.

Section 10: Accessibility Statement

Q. 19 Do you agree that the Measure 'Accessibility Statement' is needed to ensure that end-users with disabilities can find and access information regarding the specific services and support available to end-users with disabilities?

Yes. Many people with disabilities are unaware of the Measures in place, and accessibility statements can help address this – especially if they are positioned prominently on provider's websites and other areas such as retail outlets.

Q. 20 Are there any changes which could be made to the Measure 'Accessibility Statement'?

Yes. See response to Q 18. Also, providers should be required to provide and display this information in their retail outlets.

Section 11: Summary Questions

Q. 21 See paragraph 10, (a)–(i) for the full list of Measures. Do you think Measures for people with disabilities as listed are helpful to make sure people with disabilities enjoy the same access to and choice of ECS as most people?

Yes. The Measures, particularly the ‘service focussed’ Measures, are essential on a daily basis for many Deaf and Hard of Hearing people to access ECS, particularly the accessible top-up facility, text relay service and facility to test terminal equipment.

Q. 22 Can you think of other factors that are relevant to consider in making sure people with disabilities enjoy the same access to and choice of ECS as most people?

Yes. Technological advances can have potential to improve access and choice, particularly in the areas of Apps. One development we believe that has particular potential is the ‘Live Captions’ feature on new Apple iPhones, as this feature seems to deliver a very high level of accuracy in translating speech to text in realtime. If this feature became widely available, it could enhance ECS access for Deaf and Hard of Hearing people into the future. (See response to Question 2).

Submitted to ComReg on 17th October 2023.

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