Code provision summary

Information that must be provided to CSPs

Equipment suppliers must provide to CSPs, information about accessibility features of their equipment that uses a telephone handset, and that is manufactured in, or imported to Australia, for use with a standard telephone service (STS), as defined in the *Telecommunications (Consumer Protection and Service Standards) Act 1997.* That is, equipment that provides voice telephony (or equivalent) and passes the 'any-to-any' connectivity test.

The Code applies to fixed, cordless, mobile and satellite phones.

The information provided to CSPs must be in the form of either the fixed or mobile matrix as per the Guideline, mentioned above or alternatively, the GARI website for mobile devices.

The information provided must be for each model within the supplier's product range, at the time of supply. The information must be updated when there are any changes to the equipment that affect the information on any of the accessibility features.

If two or more models have the same features, one template can be used for those models. Information on accessibility equipment features not specified in the matrices (e.g. downloadable applications that may improve accessibility of the device) can also be provided, to assist consumers to make an informed choice about the best device for their specific needs, but it is not mandatory to do so.

Information that must be provided to consumers

Recognising that consumers buy telephone equipment from retail outlets as well as directly from CSPs:

- Equipment suppliers must respond to all reasonable requests from consumers for information about the features of their equipment, if that information can be provided. At a minimum, suppliers must provide the same information to consumers as is provided to CSPs.

- To facilitate such requests, equipment suppliers must have a contact point which is available at no or low cost to consumers.

Information that does not need to be provided

- Information about fax machines, small business systems and PABX equipment without handsets.

- Features listed in either matrix that the supplier's equipment does not have.

- Equipment suppliers of mobile handsets can choose to meet their obligations by making information about accessibility features available via the Mobile Manufacturers Forum (MMF) Global Accessibility Reporting Initiative (GARI).

Guideline summary

The Guideline has two matrices, for equipment used with fixed line services and for equipment used with mobile services.

Features are listed in the matrices under four headings, recognising differing communications needs:

- handset/hardware information
- mobility/dexterity features
- vision features
- hearing features

The Guideline will be regularly reviewed to ensure the matrices remain current and clear.

Further information

This factsheet can be downloaded from www.commsalliance.com.au/Documents/Fact-sheets-and-brochures.

The *Information on Accessibility Features for Telephone Equipment* Industry Code (C625:2009) and the accompanying *Operational Matrices for Reporting on Accessibility Features for Telephone Equipment* Industry Guideline (G627:2009) including the matrices can be downloaded from www.commsalliance.com.au/Documents/consumers

The *Telecommunications Consumer Protections* Industry Code (C628:2007) can be downloaded from www.commsalliance.com.au/Documents/consumers

The mobile accessibility website of the Mobile Manufacturers Forum is at www.mobileaccessibility.info/

The ACMA Information on accessibility features for telephone equipment webpage is www.acma.gov.au/WEB/STANDARD/1001/pc=PC_100841

About Communications Alliance

Communications Alliance is the peak body for the Australian communications industry. It presents a unified voice for its members in public policy, facilitates industry solutions to industry issues, and provides up-to-date information on industry issues. Communications Alliance is also leading the industry's response to the National Broadband Network implementation. For further information see www.commsalliance.com.au.

Guidance for Suppliers in providing information on the accessibility features of telephone equipment

COMMUNICATIONS ALLIANCE LTD

Who should read this factsheet

Equipment suppliers (manufacturers and importers) of telephone products in Australia, such as mobile phones, fixed-line phones and phones/devices that connect to a PABX.

Providing information on accessibility features for telephone equipment

With effect from April 2007 (and revised 2009), the *Information on Accessibility Features for Telephone Equipment* Industry Code (C625:2009) and the accompanying *Operational Matrices for Reporting on Accessibility Features for Telephone Equipment* Industry Guideline (G627:2009) require equipment suppliers to provide certain information to telecommunications Carriage Service Providers (CSPs) about the accessibility features of their telephone products.

In addition, CSPs are required to provide information to their customers about features of equipment they supply that meet a customer's specific communication needs under the *Telecommunications Consumer Protections* Industry Code (C628:2007).

Why is this important?

There are two basic obligations on equipment suppliers in the Code:

- to provide accessibility information on equipment features to CSPs; and
- to respond to all reasonable requests from consumers about accessibility features of their equipment.

It is an important part of your corporate and social responsibilities. Accessibility is an important issue and there are many features on existing devices that could benefit a person who has specific accessibility requirements. By completing the relevant matrix in the Guideline, you are making it possible for consumers to make the right product choice and fulfilling your obligations to your service provider customers.

What you have to do?

1. Complete the information

Filling out the matrices

Your organisation is required to complete a matrix (as per the Guideline) on each telecommunications product/device that you sell in Australia either directly or through retail outlets. There are separate matrices for mobile devices and fixed-line devices.

Alternate compliance arrangements for mobile handset suppliers

If you are an equipment supplier of mobile handsets, you can meet your obligations for the provision of accessibility information for those mobile handsets by making that information available via the Mobile Manufacturers Forum (MMF) Global Accessibility Reporting Initiative (GARI). Further information on the GARI can be found at www.mobileaccessibility.info.

Suppliers of System Integral Terminals

Equipment suppliers of System Integral Terminals (SITs) are required to provide a publicly available contact point within their organisation for inquiries on the accessibility features of SITs. It is also highly recommended, but not an obligation, that the information is provided in a matrix consistent with the Guideline.

2. Where do you have to send it?

You are required by the Code to send a completed matrix or provide a weblink to the matrix (or to the MMF GARI website as appropriate) to the Accessibility contact at the CSPs with whom you deal for your mobile and fixed devices that are available for sale from your company.

It is also prudent to ensure that your sales and customer service teams have access to the matrices. It is recommended that you make the completed matrices available on your internal intranet and external website, and ensure that your relevant employees are aware of their availability.

Website information

It is recommended that manufacturers place the completed information on their website (or the MMF GARI website), either one matrix for each individual product/device, or a composite matrix listing all devices for sale in Australia. Making this information available on your website has a number of immediate benefits:

- It avoids relying on the provision of information by mail or e-mail.

- It allows your organisation to control the content. Should something change with one of your products, you can update and amend it and then resend the web link to the appropriate contacts.
- It allows you to simply provide a web link to your service providers which they can look up as required – and they can share within their organisation.
- It is easy for organisations and consumers who may have accessibility-related questions to find this information directly, without having to contact your business.
- You can use it to demonstrate and promote your organisation's commitment to its customers and your corporate and social responsibility.

3. Respond to requests

You are required to provide a local public contact and an industry contact for your organisation to answer any accessibility related issues and questions about your products/devices.

The information should be made available on request in an accessible format such as HTML, MS Word or RTF.

Who is best to do it?

Most organisations have their product management team fill out the matrices.

If your organisation has an accessibility team or specialist, these people would also be well placed to fill out the matrices. Many manufacturers ensure that their sales team has this information and shares it with their customer as part of each sales process as this information is typically part of the compliance material that needs to be provided in order for a product to be accepted/approved for sale.

Regulatory powers

The *Australian Communications and Media Authority* (ACMA) may employ its safety net powers under Part 6 of the Telecommunications Act to ensure compliance with registered Industry Codes. These powers enable ACMA to issue formal warnings to industry participants (in this case manufacturers and importers of telephone equipment and devices) regarding breaches of a code and also to direct industry participants to comply with the provisions of a code where contravened. That direction is enforceable in the Federal Court and non-compliance with a Court judgment can attract significant fines. Further information can be found at the *ACMA approach to telecommunications code compliance* webpage at www.acma.gov.au/WEB/STANDARD/pc=PC_2526.