

TRAI's CONSULTATION PAPER ON "MAKING INFORMATION AND COMMUNICATION TECHNOLOGY (ICT) ACCESSIBLE FOR PERSONS WITH DISABILITIES"

COMMENTS

Q1. Which are the disabilities, with specific accessibility requirement, other than those mentioned in para 2.3 of the Consultation Paper that require consideration for preparing a framework?

The Rights of Persons with Disabilities Act, 2016 (RPwD Act, 2016) recognized 21 types of disabilities. However, broadly following types of disabilities requires the accessibility of ICT.

- Locomotor disability;
- Muscular dystrophy;
- Cerebral Palsy;
- Low Vision;
- Blindness;
- Deaf;
- Hard of Hearing;
- Speech & Language Disability;
- Multiple Disabilities;

Q2. Apart from the challenges enumerated in para 2.3 of the Consultation Paper, what other challenges do PwDs face while accessing telecommunication and broadcasting services?

- **Locomotor Disability, Cerebral Palsy and Multiple Dystrophy** – faces challenging related to ICT in terms of accessible key boards for computers, accessible ATMs for financial transactions, accessible computer hardware & software including various remote sensing applications for meeting the day-to-day need related to ICT.
- **Low Vision & Blindness** – face challenges in reading writing, financial transactions and performing their day-to-day activities;
- **Deaf, Hard of Hearing and Speech & Language Disabilities** – have challenges in communication and interaction for their day-to-day activities.

Q3: In your opinion, what are the reasons for the desired benefits of ICT (telecom and broadcasting) not reaching the PwDs despite several policy measures and scheme being implemented?

Though, there are many policies have been available related to the ICT particularly for visual disability and hearing disability and to some extent for locomotor disabilities. However, a great need is to make the people aware who are dealing with the development and implementation of such policy for persons with disabilities. Ignorance may be one of the factor which deprived persons with disabilities for taking benefit of this. The other major reason is sensitivity towards providing them all facilities, for which the policy implementation strategy should be simple and user friendly.

Q4: What additional or corrective measures can be taken by the Government to enable better access to telecommunication and broadcasting services and devices to PwDs? Please give a rationale for your response.

So far as the telecommunication and broadcasting services/measures from the government are concerned, the Section 40 of the RPwD Act, 2016 provides that the “Central Government shall, in consultation with the Chief Commissioner, formulate rules for persons with disabilities laying down the standards of accessibility for the physical environment, transportation, information and communications, including appropriate technologies and systems, and other facilities and services provided to the public in urban and rural areas”. With reference to this section, the concerned Ministry/Department should frame a policy in consultation with various experts related to ICT and Broadcasting services and device a user friendly implementation strategy.

Q5: Apart from the measures suggested by ITU, what additional measures can be taken by the TSPs and equipment vendors/suppliers and other stakeholders to address the challenges faced by PwDs while accessing telecom and broadcasting services?

The above proposed policy should have specific clause for TSPs and equipment vendors/suppliers so that they could also be clear about their role and responsibility. Policy should clearly mention about the orientation and training required regarding ICT and broadcasting services through the TSPs and equipment vendors/suppliers. The training will mainly focus on the need of persons with disabilities with reference to ICT and Broadcasting services.

Q6. What are the areas where collaboration between various stakeholders would be useful and how?

In the following areas collaboration between various stakeholders required –

- Sensitisation about Acts, Laws & Policies;
- Orientation training programmes;
- Cost effectiveness of the ICT products;
- Marketing and making the product available to persons with disabilities;

Q7. Should the Government/TRAI direct the telecom and broadcasting service providers to provide information pertaining to billing, usage, pricing and contracts in the form accessible to PwDs? Please provide a rationale for your response.

Yes, the above proposed policy at Q. No.4 may also have guidelines pertaining to billing, usage, pricing and contracts.

Q8: Should the Government/TRAI mandate that the devices used for watching television provided through cable, satellite/DTH, fibre, etc. should be made accessible to PwDs?

Yes.

Q9. Should international accessibility standards be adopted for telecommunication and broadcasting services and devices in India? Please suggest steps required to ensure their adoption by the service providers/device manufacturers.

Yes, to a certain extent it should be adopted, however, the need and resources available at national level may also be given priority while considering the standard.

Q10. What additional measures can be taken or technologies can be deployed by service providers or equipment manufactures to assist PwDs?

Expert consultation may be taken.

Q11 Should device manufacturers be mandated to allow in their device's operating system those applications which are meant to assist PwDs? Please justify your response.

Yes, all device manufacturers should be aware about the need of persons with disabilities with reference to ICT so that they can adequately provide the suitable application in the device which is being used by persons with disabilities. Presently, the mobile sets are being used by persons with visual disabilities are a good example of it.

Q12. What measures can be taken in India so that emergency services are made more accessible for PwDs? Should the implementation of these measures by TSPs be made mandatory by the Government?

Sensitisation and awareness generation among the service providers is important. The policy of government of India should have specific clause on this issue.

Q13. Should the device/handset manufacturer be mandated to manufacture at least one model of handsets for PwDs which is having accessibility features and which are compatible with assistive technology features such as hearing and visual aids including emergency buttons?

Yes, at least to start with and after that the same can be replicated by others keeping in view the volume of the product and the resources of the manufacturer.

Q14. How should companies be encouraged to utilise their CSR funds for development of applications, devices and services for the PwDs? What kind of devices and applications can be envisaged/designed to make achieve ICT accessibility for PwDs?

Through sensitisation and awareness programmes.

Q15. Should any other funding mechanism for the development of applications, devices and services meant for the PwDs be considered? Please give a rationale for your response.

Yes, it can be explored through the expert consultation.

Q16. How can effective campaigns be designed to create awareness about use of ICT accessibility tools? Can such campaigns be funded by CSR funds? If not, what other mechanisms can be used to fund such campaigns?

Campaign must contain the awareness about the need of persons with disabilities and use and importance of ICT for their mainstreaming and protection of rights and making them productive citizens for the nation. Funds can be arranged for the effective campaign from various sources such as government schemes and CSR, etc.

Q17. Should the Government incentivise the manufacturing and development of ICT tools and devices viz. tools for mobile accessibility, TV accessibility or for web accessibility for PwDs? Please give a rationale for your answer.

Yes, as far as possible there should be a clear cut policy about providing the incentive. As incentive will be a motivation for them.

Q18. Please give inputs/suggestions/comments on any other issues which you feel are relevant to the subject matter.

Ministry of Information & Broadcasting has already constituted a Committee of experts and stakeholders to formulate accessibility standards for persons with disabilities keeping in view the provisions of the RPwD Act, 2016. The Committee will mainly formulate the accessibility standards for broadcasting with reference to the persons with hearing disabilities.



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