Electronic Communications for end users with disabilities

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Accessibility to electronic communications for persons with disabilities

UN Convention on the Rights of Persons with Disabilities Article 9 on Accessibility:

"To enable persons with disabilities to live independently and participate fully in all aspects of life, States Parties shall take appropriate measures to ensure to persons with disabilities access, on an equal basis with others, to (…) Information, communications and other services, including electronic services and emergency services"

The EU Telecoms framework

2009 revision: good example of mainstreaming disability in EU legislation as it follows the UN CRPD

European Electronic Communication Code (EECC) and **European Accessibility Act** (EAA):

Opportunity to achieve the Triple A conditions for persons with disabilities to enjoy ICT on equal basis with others:

- Available (EECC)

- Affordable (EECC)

- Accessible (EAA)

General objectives

1. Equal access and choice for end-users with disabilities

2. Availability and compatibility of Total Conversation (voice, video and RTT) across the EU

   - Real Time Text (RTT), another way of calling, a reality in the US

2. Availability and compatibility of

   - Text relay services
   - Video relay services

3. Affordability

4. 112 and 116000 services on equal basis with others

5. Must carry obligations for TV access services

However…
[MeAC study](#) – November 2013

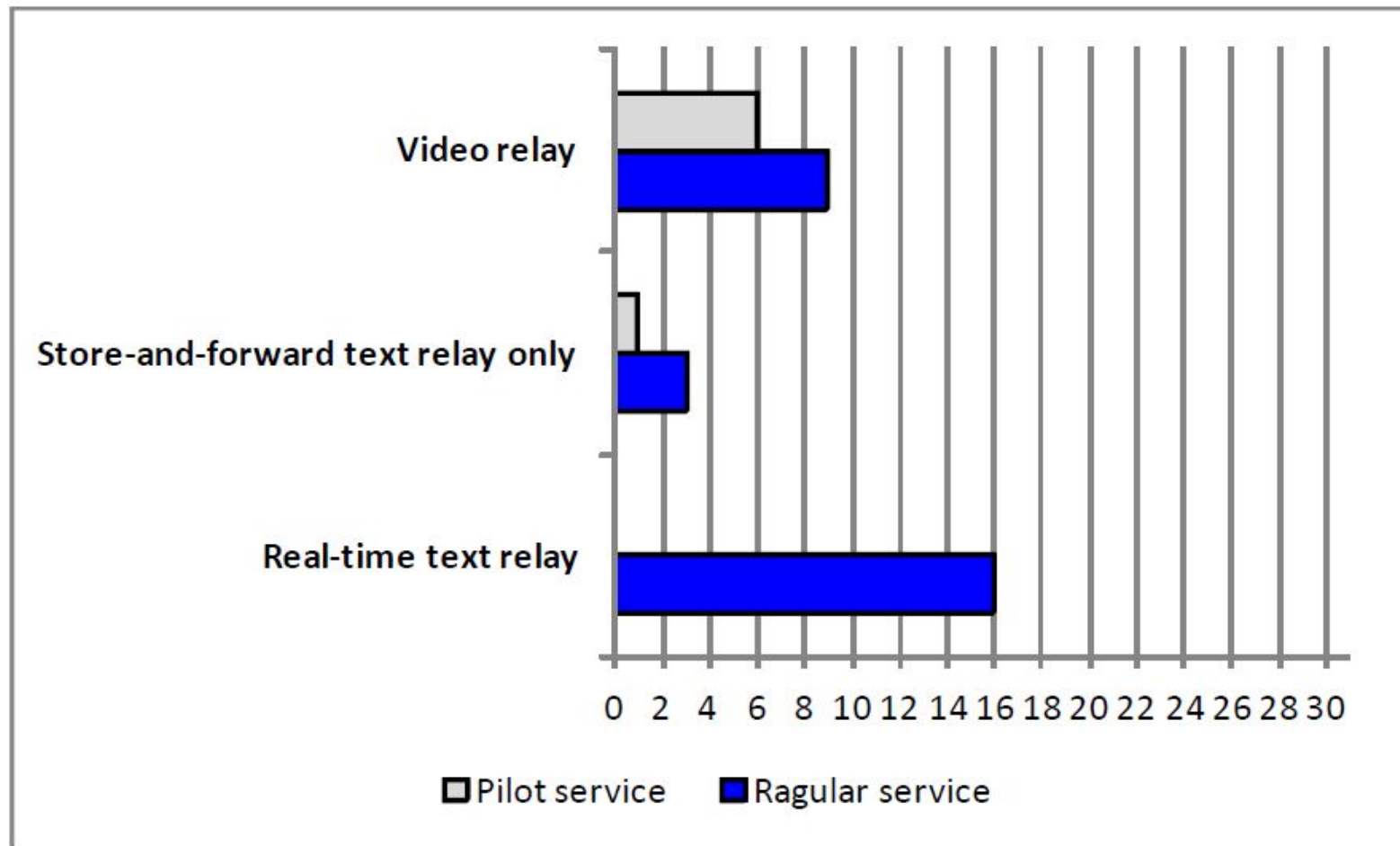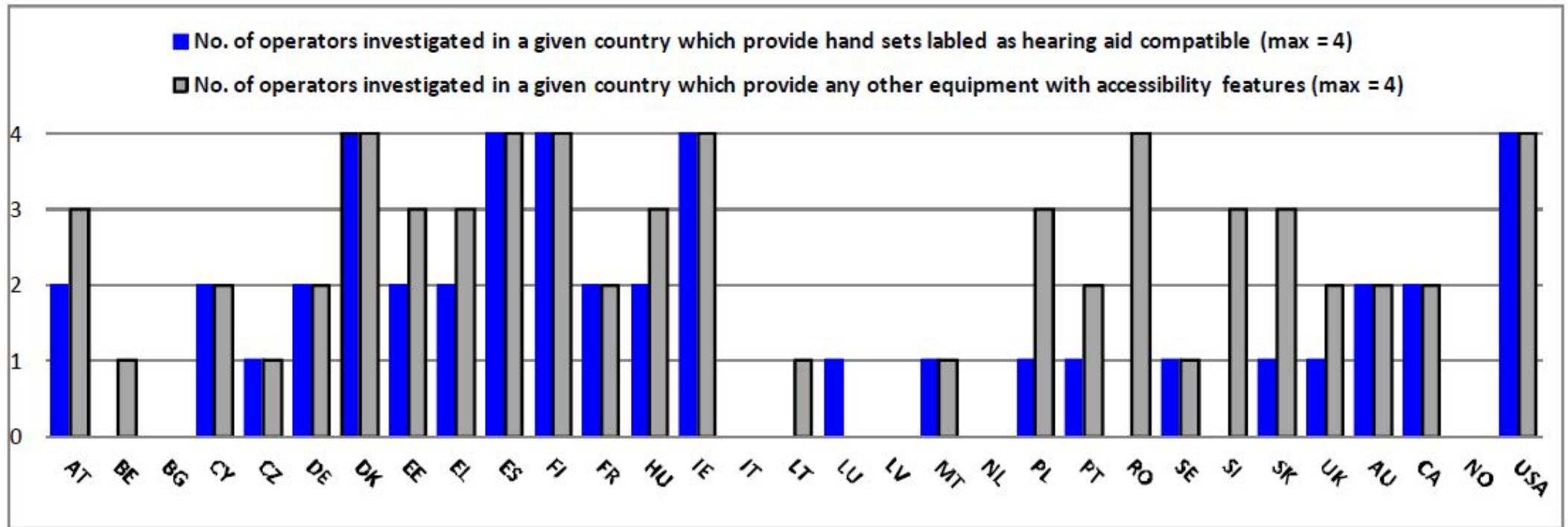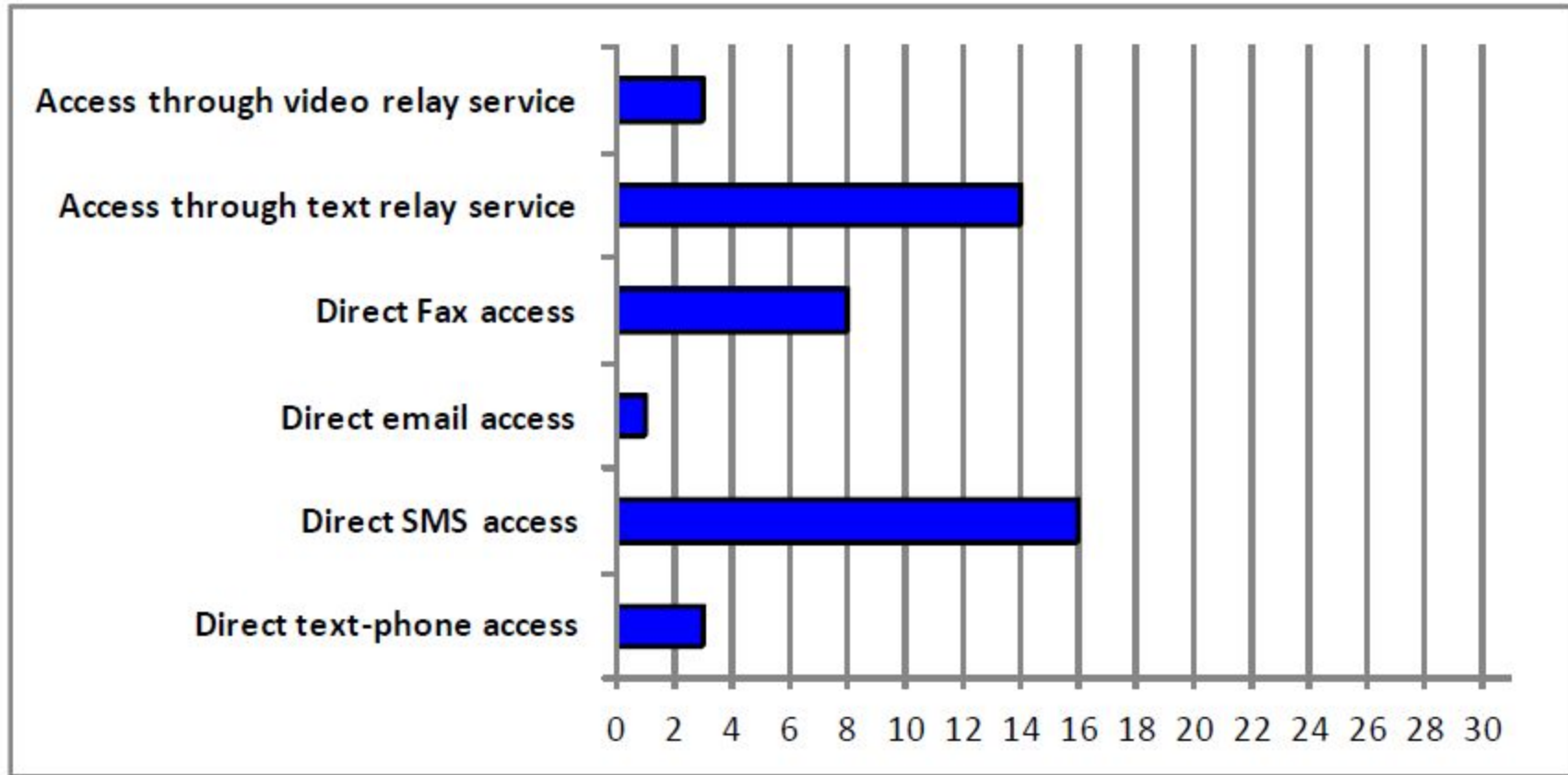Figure 3-3 No. of countries in which a relay service is available (n=31)

Figure 3-5 No. of telecoms operators offering accessible end user equipment per country

Legend:
- No. of operators investigated in a given country which provide hand sets labled as hearing aid compatible (max = 4)
- No. of operators investigated in a given country which provide any other equipment with accessibility features (max = 4)

Note: The two main fixed line operators and two mobile operators were investigated in each country.

Figure 3-6 No. of countries where access to emergency services is provided by alternative communication modes (n=31)

Access through video relay service
Access through text relay service
Direct Fax access
Direct email access
Direct SMS access
Direct text-phone access

0 2 4 6 8 10 12 14 16 18 20 22 24 26 28 30

Note: More than one access option may exist in a given country
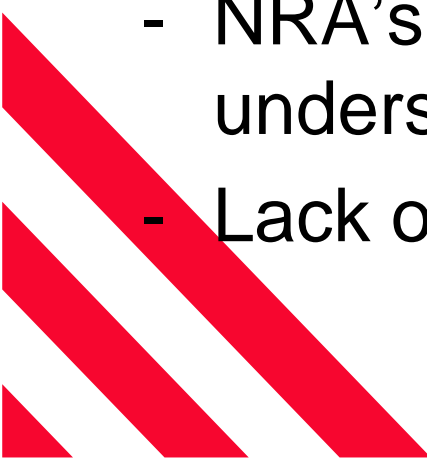
MeAC 3 conclusions:

- Progress in recent years
- Room for improvement in both access and choice
- Considerable variation across Member States

More updated and detailed information is available at:

[BEREC - 2015 report on equal access and choice](#)

Further barriers encountered by EDF members:

- Lack of interoperability and common approach (e.g. RTT, emergency services)

- PwD living in remote areas – less choice of accessible services and/or not aware of the their availability

- Lack of accessible mainstream products

- Lack of involvement of organisations representing persons with disabilities in the NRA's - some too business-oriented

- Non-accessible information, e.g. websites of Telecoms providers – no requirement by NRA's

- NRA's lack of guidance for users and providers in understanding accessibility provisions

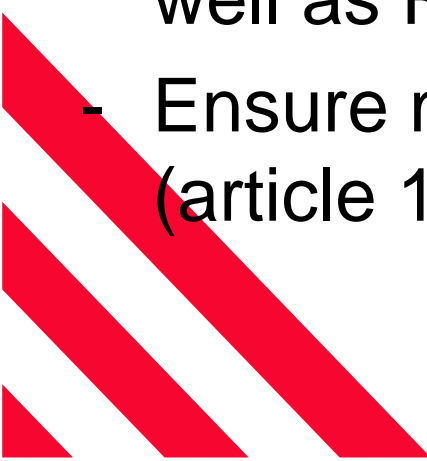- Lack of regular monitoring regarding accessibility

EDF Recommendations:

For the EECC:

- Keep a broad and inclusive approach to two-way (voice) communication (Total Conversation: voice, video and RTT) (Recital 14 and article 2. Definitions)

- Strengthen the NRA's tasks regarding accessibility (art.5)

- Include standards for Real Time Text and video calls interoperability (art. 59)

- Affordability and availability of universal services, including for RTT and text and video relay services (art. 79, 80, 81 and Annex V)

EDF Recommendations:

For the EECC:

- Strengthen the access to emergency services on equal basis with others through SMS, RTT and third party relay services across the EU and without pre-registration. Enable advanced mobile location system (art. 102)

- Equal access and choice shall be maintained and complemented by ensuring the availability of at least one text relay service and video relay service in the country, as well as RTT to allow Total Conversation (art. 103)

- Ensure must carry obligations for audiovisual services (article 106)

EECC vs EAA:

EECC	EAA
Availability & affordability of <u>special</u> equipment	Accessibility requirements for <u>mainstream</u> products (smartphones). E.g. able to support Total Conversation
Availability & affordability of <u>Universal Services obligations</u> + Total Conversation + TRS and VRS Accessible 112 services across EU	<u>Harmonised functional accessibility</u> requirements for those
Interoperability for RTT and video call through NRA action	Interoperability for RTT through <u>Harmonised Standards (preferred)</u>
NRA's tasks regarding equal access and choice for end-users with disabilities	Accessible Information, websites and mobile apps of electronic communication providers

THANK YOU

For more information please contact EDF Secretariat:

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