

Ensuring Equivalence of Access and Choice for Persons with Disabilities in Telecommunication Markets

Consultation Document 2021 March 12 Unlabeled graphic **Ensuring Equivalence of Access and Choice for Persons with**

Response from

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Question 1: Do you agree with the proposal? Please justify your position and provide supporting information and references.

CH: Do not agree.

- 1. Where feasible services should be inclusive. I believe this should be the priority and that specialized services should be considered only where it is not reasonably feasible to provide inclusive services.**
- 2. All consumers should have the right to pay only for services they use. If the OUR supported this philosophy deaf persons could choose only to pay for text.**
- 3. The World Health Organization estimates that approximately 10% of our population has a disability. Currently the JCPD has approximately 32000 persons on their books; many of these persons are not fully registered. A major barrier is the cost of seeing the requisite professional who has to sign off on the disability. Until we can solve this problem a significant number of persons to whom these services are targeted will fail to benefit.**

[Disabled still face great challenges despite Ja being first to sign UN charter | Lead Stories | Jamaica Gleaner \(jamaica-gleaner.com\)](#)

Proposal II

CH: Agreed, Conditionally.

Under Section B regarding "Return Policy" Shouldn't the OUR be promoting this policy for all consumers? I know there are entities which do offer reasonable return policies, E.G. PriceSmart.

Proposal III

Question 3: Do you agree with the proposal? Please justify your position and provide supporting information and references.

Proposal IV

CH: Agreed.

Proposal 4

CH: Agreed (with addition)

This proposal should also cover information included in their mobile apps.

Proposal V

Question 5: Do you agree with the proposal? Please justify your position and provide supporting information and references.

CH: Agreed.

Proposal VI

Question 6: Do you agree with the proposal? Please justify your position and provide supporting information and references.

“This would include having a dedicated customer support facility for PWDs at call centres and in stores.”

CH: Is this a practical and reasonable requirement in all stores? Would it have any relationship to the number of staff at a particular store? I am assuming “dedicated” means “solely for the purpose”.

Proposal VII

Question 7: Do you agree with the proposal? Please justify your position and provide supporting information and references.

CH: Agree with caveats.

1. Licensees shall provide subscribers that have a vision impairment and/or have difficulty reading the printed phone directory, with access to a free directory assistance service subject to subscribers meeting the required certification of

disability by the designated entity(ies).

1. “and/or” would suggest that this clause includes all persons who are not literate. I do not believe the JCPD certifies persons who are not literate if they do not have a disability.
2. This proposal appears to focus on print and does not seem to recognize the fact that directories could be provided in other formats (e.g. searchable electronic or audio formats, accessible app) which could be accessible to **some** blind or visually impaired persons.

Proposal VIII

Question 8: Do you agree with the proposal? Please justify your position and provide supporting information and references.

CH: Agreed.

Proposal IX

CH: Agreed.

Proposal X

Question 10: Do you agree with the proposal? Please justify your position and provide supporting information and references.

CH: Disagree.

- 1. I do not believe persons should be required to register for equivalent services. As customer of a bank I do not think I should register as disabled in order to use their ATM or website. Similar, Similarly I do not see why I should register as disabled to get services which are available to other subscribers of broadband or telephone service. Elderly persons are not required to register as elderly in order to join the “care line” at public utility offices or other locations which provide generalized services from which they benefit.**
- 2. Requiring persons to register a Screen Name is not the same as registering as a person with disability. The example given in 5.11.2 does not support the argument made.**
- 3. Persons wishing to commit fraud will use whatever system is available (e.g. lotto scammers use phone, internet, money transfer services, etc.). It is for the relevant bodies to put systems in place to prevent and catch fraud rather than to place unnecessary burdens on persons who wish to legitimately utilize the services.**
- 4. One reason for the low number of persons registered as disabled is that the process is often very costly for many persons who are already without an income. Unless the OUR is comfortable with excluding the majority of disabled persons from the proposed benefits they should seriously reconsider this proposal.**

[Disabled and disconnected \(jamaicaobserver.com\)](http://jamaicaobserver.com)

Question 11: Do you agree with the proposed implementation timelines? Please justify your position and provide supporting information and references.

CH: Agreed

- 1. Testing Facility within 9 months. Assuming that testing will be done in stores, I think it is feasible for it to come on stream at the same time the devices are made available (6 months).**

Recommendation I

Facilities should be made available for the certification of disabilities. These certification facilities should be made available in major towns of each parish to ensure accessibility by persons with disabilities across Jamaica.

CH: Although this sounds good in principle, I do not believe it is practical. Disabilities cover a wide spectrum and the professional in many of the areas are quite limited. You would not have the personnel to establish ongoing registration offices in each parish unless the current registration requirements were drastically changed.

It is recommended that Jamaica adopts an inclusive public procurement policy in order to promote equivalence within the ICT market for end-users with disabilities.

CH: Agreed. The recommendation should be extended to require public bodies to employ a set percent of qualified persons with disabilities. This is likely to improve their knowledge of persons with disabilities and help to ensure that the focus is maintained.

Recommendation VI

Entities providing publicly available ICT equipment/devices should ensure that the ICT equipment/devices and the facilities in which they are housed are accessible and available on an equivalent basis to PWDs.

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CH: Agreed. Noting that many persons with disabilities incur significant additional cost for transportation, focus should also be placed on helping persons obtain devices and services for home use.

Recommendation V

A national public outreach programme should be created to raise awareness of the benefits of ICTs for PWDs, existing ICT accessibility policies and accessible offerings that PWDs can access in an equivalent manner. The campaign should be developed by the Ministry with responsibility for ICTs in collaboration with the Ministry with responsibility for PWDs, ICT regulators, disability organizations and private sector stakeholders. The information that is made available to the public through these campaigns should be provided in accessible formats with the input and involvement of persons with disabilities and their organizational representatives.

CH: Agreed.

Recommendation VI

An ICT Accessibility Programme funded by the Universal Service Fund should be developed to address the ICT accessibility needs of PWDs.

CH: Agreed.

Notes:

- 1. I did not think it necessary to provide references to support a proposal or recommendation when the OUR's presentation already included the appropriate references.**
- 2. Where I opposed proposal or recommendations I tried to find supporting information.**
- 3. For a blind person, having questions below the proposal or recommendation they were referring to would have made it easier. In order to avoid confusion on my part I have focused on the proposal and recommendations instead of trying to match question numbers.**