

Jamaican Associations on Intellectual Disabilities (JAID) proposed amendments to

OFFICE OF UTILITY REGULATION (JAMAICA)

ENSURING EQUIVALENCE OF ACCESS AND CHOICE FOR PERSONS WITH DISABILITIES IN TELECOMMUNICATION MARKETS

CONSULTATION DOCUMENT

<p>Page 9, Chapter 1: Introduction 1.1 Background- LINES 7-8</p>	<p>“However, most of the world’s population of PWDs have a type of disability that affects their access to ICTs.” APPEARS TO BE IN CONFLICT WITH “... from viewing disability as a condition that is inherent in the person to viewing it as a relational concept where persons are disabled by society instead of by their bodies.” Wording of “however.....” may need to be changed.</p>
<p>Page 40- Proposal 1 1. Subject to subscribers receiving the required certification of disability by the designated entity(ies), service providers shall make available to subscribers with disabilities, service plans that are suited to their needs. The offers should be such that PWDs pay only for the services they are able to use. 2. Subject to 1 above, all service providers shall make available to PWDs post-paid and prepaid base plans. The composition of the base plans should be similar to that of a standard plan with the difference being that the services are accessible to persons</p>	<p>Question 1 : Do you agree with the proposal? Please justify your position and provide supporting information and references.</p> <p>a. Yes, we agree with the proposal.</p> <p>Justification: for example for persons who are not able to communicate over voice networks. The providers should have a setup similar to the AT aT Accessibility Plan where you present proof of disability. For Jamaicans that would be a duly issued card from the JCPD thereafter, the person would be able to access various plans suited to them but equivalent in value to the plan received by a Person without a Disability. For example please see link to attached supporting document</p> <p>https://www.att.com/ecms/dam/att/consumer/help/pdf/TAP-disability-certification-form.pdf</p>

with a particular disability(ies).	
<p>Proposal II</p> <p>1. Service providers shall ensure that their own or third party distribution channels, ...</p>	<p>Question 2: Do you agree with the proposal? Please justify your position and provide supporting information and references.</p> <ul style="list-style-type: none"> a. Staff must not only be trained in the use of the pre loaded accessibility software or devices but they must also be trained in how to communicate with PWDS. b. For cable packages, hardware such as remotes and hand held devices must be adapted for persons with disabilities. This may mean touch screen home phones in some cases or phones with large numbers. For remotes fewer buttons or 1 touch features and easy access to needed functions.
<p>Proposal III</p> <p>Service providers shall be required to provide bills and contracts to PWDs in a format that is reasonably acceptable to the subscriber. It is not sufficient for service providers to merely provide the service, they must also make consumers aware of this service and it must be readily accessible...</p>	<p>Question 3: Do you agree with the proposal? Please justify your position and provide supporting information and references.</p> <p>Yes we agree with the proposal particularly because it is a known fact that persons with Intellectul or Cognitive restraints do indeed find it difficult to read the various bills in their current form. As a result a format that outlines prior usage , current usage and amount owed in bold letters may be more acceptable but stakeholder consultation in this matter will be essential. Use of symbols on the bills may also be useful in making it more understandable for PWIDs or Cognitive functioning issues.</p>
<p>Page 45: Proposal IV</p> <p>Service providers shall ensure that:</p> <ul style="list-style-type: none"> a. Information regarding their products and services, including that which is available to the majority of end-users, is accessible to users with disabilities... 	<p>Yes, we agree with the proposal.</p> <ul style="list-style-type: none"> A. Websites must must have international disability sign on home page so that section is easily accessible. On the page itself consider the use of pictures or symbols to indicate where to access various information. B. At least disability acessible section must have automatic software that reads contents of page.
<p>Page 46: Proposal V</p> <p>Licensees shall make available to PWDs, information on the products and services that they provide which are suitable for the</p>	<p>Yes we agree with the proposal. As it relates to the publication of information. In formation must be clear and concise and use mostly pictures or symbols to relay the information for persons with Cognitive impairment.</p> <p>For customer service, agents must be trained on how to communicate with persons with varying disabilities.</p>

<p>needs of different categories of PWDs. At a minimum, this would require the publication of information as well as the provision of accurate advice to customers over the telephone as well as in stores.</p>	
<p>Proposal VII 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). There shall be no limit on the number of times that such subscribers can access the service.</p>	<p>Yes we agree with the propopsal. Note though that process to access same must be one touch.</p>
<p>Proposal VIII 1. All service providers shall ensure that their subscribers are able to terminate SMS to the emergency call centres, unless it is technically infeasible. In keeping with section 48 of the Act the facility shall be provided at no cost to their subscribers.</p>	<p>We agree with the proposal. This is especially important for teens and young adults with Special Needs, particularly cognitive impairment who form part of the most vulnerable and who in most cases are unable to purchase credit for their call phones.</p>
<p>Proposal IX</p>	<p>We agree to the proposal. This would be most beneficial while other aspects of the proposal are being finaliazed such as Proposal III.</p>

<p>1. Service providers shall allow PWDs to nominate a person to receive copies of bills and correspondence relating to bills, without the third party becoming liable to pay the bill. The third party would have to consent to this role.</p> <p>2. Service providers shall allow PWDs to nominate a person to make fault notifications on their behalf.</p>	<p>PWD always need an advocate other than themselves so this person could assist in navigating all these processes.</p>
<p>Proposal X Every service provider shall establish and maintain a system or enhance and maintain their existing system to enable subscribers who are PWDs to register their requirements (for billing, third party notification, etc.). The system used for registration of PWDs must be able at a minimum to record, subject to the PWD subscriber's consent, the information listed at 5.11.1.</p>	<p>We agree with the proposal. Please refer to document in Proposal 1</p>
<p>Page 52: Timeline for implementation of measures</p>	<p>We agree with the recommendation, however "Emergency Services" Timeline leaves too much room for this process to never be implemented. This needs a sit down with stakeholders to see if it is feasible or not.</p>
<p>ICT Accessibility Recommendations Recommendation I Facilities should be made available for the certification of disabilities. These</p>	<p>Recommendation 1 We agree with this recommendation. Maybe we could start with a cubicle in the Ministry of Labour Offices island wide.</p>

<p>certification facilities should be made available in major towns of each parish to ensure accessibility by persons with disabilities across Jamaica.</p> <p>Recommendation II A national classification/definition scheme should be created for the different types of disabilities.</p> <p>Recommendation III 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.</p>	<p>Recommendation II Yes we agree with the recommendation JCPD could spearhead the registration using the WHO classifications. This means that a certified Disability Card should be issued from the JCPD upon successful registration citing type of disability.</p> <p>https://apps.who.int/iris/bitstream/handle/10665/41003/9241541261eng.pdf;jsessionid=70128755D26006CFEA1AF7700F20A736?sequence=1</p> <p>Yes we agree with the recommendation. Please see supporting document:</p> <p>https://www.itu.int/en/ITU-T/Workshops-and-Seminars/20190325/Documents/Draft%20Standards%20in%20the%20Procurement%20of%20Accessible%20ICT%20Products%20and%20Services.pdf</p>
<p>Recommendations IV</p>	<p>Is incorrectly numbered as VI</p>
<p>Recommendation IV 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</p>	<p>We agree with the recommendation. Also we ask that you consider the following for accessible facilities:</p> <ol style="list-style-type: none"> a. Doors must have sensors indicating that person is near to door and whether the door swings inward or outward. b. Bumpers in stores around display areas/cases with bright colours to assist the navigation of the visually impaired. c. Symbols and pictures to make navigation easier for the cognitively impaired. d. adequate space for wheelchairs to manoeuvre.

equivalent basis to PWDs.	e. Signs must be raised so that visually impaired and touch and know what it is or have sensor to indicate location of say bathroom ect.
Recommendation V	We agree with the recommendation but request that a timeline be affixed to same and also provide an indication of the Ministry's willingness to fund same.
Recommendation VI An ICT Accessibility Programme funded by the Universal Service Fund should be developed to address the ICT accessibility needs of PWDs.	We agree to this recommendation. An established programme under USF would ensure a standardized budget and monitoring which is what such a program would require; steady funds and monitoring.