

CONSULTATION WITH AND RESPONSE OF THE JAMAICAN DEAF COMMUNITY

To the OUR Document: Ensuring Equivalence of
Access and Choice for Persons with Disabilities
in Telecommunication Markets



**The *Deaf Community's Comments to the OUR Document:
Ensuring Equivalence of Access and Choice for PWD's in Telecommunication Markets:**

The *Deaf Community represents individuals who are deaf, hard of hearing and hearing raised by deaf parents and/or with deaf or hard of hearing siblings, and hearing members identifying with the culture of the community.

Comments/Questions:

- a) Point 1.2: Agreed
 - b) 3.2.2. Hearing Impairment- adjusted to Hearing Disabilities or Hearing Losses, or Hearing Disabilities/Impairment to signify respect for all diverse peoples within this broader group
 - c) 3.3.16-3.3.19- Agreed on the current state of equivalent choice
 - d) 4.3.4: What type of adapting device for persons with cochlear implants?
 - e) When is the effective date of the implementation of these proposed measures?
- 1) Proposal I: Special Plans for PWD's
- a. Question 1: Do you agree with the proposal. Please justify your position and provide supporting information and references.
 - i. Agreed
 - 1. This proposal does not appear to resonate with the Universal Service Design concept that decrees that all services are provided for all end-users but with different plans for PWD's.
 - 2. Ensure that packages provided are flexible for the Deaf community with more plan options, such as 200 minutes for voice calls may be decided by the Deaf client to keep or remove. One of the other options is to increase data for web-browsing and video conferencing to be enjoyed by the Deaf as part of their daily communication needs.
 - 3. Cable box and local apps including the Digicel 'PlayGo' app are currently without closed captions or subtitles, which need to be addressed.
- 2) Proposal II: Provision of Accessible Devices
- a. Question 2: Do you agree with the proposal. Please justify your position and provide supporting information and references.
 - i. Agreed
 - 1. Customer care will need to provide sign language access for the Deaf Community. Create video relay services to accommodate visual clients when discussing matters with the translator. Companies should accept third-party apps such as Speech to Text, Text to Speech, etc as other options to provide assistance for some persons who may be comfortable with using these apps
 - 2. Transcribe app needs to match the Jamaican context. Sometimes it is not that we are not speaking good English but the accent causes mispronunciations.
- 3) Proposal III: Provision of Bills and Contracts in Accessible Format
- a. Question 3: Do you agree with the proposal. Please justify your position and provide supporting information and references.
 - i. Agreed
 - 1. Produce JSL videos explaining the bills and contracts for the Deaf community in the absence of live translators

- 4) Proposal IV: Provision of General Information on Services in Accessible Format
 - a. Question 4: Do you agree with the proposal. Please justify your position and provide supporting information and references.
 - i. Agreed
 1. There must be JSL interpretation on video or live, aside from "Easy Read," of critical, advanced, and complicated matters for consideration prior to agreement.
- 5) Proposal V: Provision of Information to PWDs on the Products and Services Suitable for Them
 - a. Question 5: Do you agree with the proposal. Please justify your position and provide supporting information and references.
 - i. Agreed
 1. There must be JSL interpretation on video or live, aside from "Easy Read," of critical, advanced, and complicated matters for consideration prior to agreement.
- 6) Proposal VI: Accessible Customer Support Services
 - a. Question 6: Do you agree with the proposal. Please justify your position and provide supporting information and references.
 - i. Somewhat agreed. While it may be nice to have a trained facility dedicated to PWD's at call centres and in stores, all individuals working in these facilities must be trained to accommodate the general communication needs of all diverse individuals. Should there be unique circumstances where increased/ dedicated attention is needed, those with advanced training may be prompted for further assistance.
 - ii. There must be a system for the Deaf community to message when requesting customer care and support services
 - iii. Video relay services will need to be part of this as accessible customer support services
- 7) Proposal VII: Accessible Directory Assistance Services
 - a. Question 7: Do you agree with the proposal. Please justify your position and provide supporting information and references.
 - i. Agreed
 1. Although this most relates to persons who are blind and/or with loss of vision, there are some deaf clients who desire large-print directory and easy-to-find directory which can be manipulated in accessible format through apps
 2. Offer app options for accessible directory access in accessible format
- 8) Proposal VIII: Accessible Emergency Services
 - a. Question 8: Do you agree with the proposal. Please justify your position and provide supporting information and references.
 - i. Agreed
 1. This is in line with the standard toll-free emergency calls. Only with the Deaf community, there must be a messaging system that should be free of cost and easily tracked.
 2. Recommendations:
 - a. Avail location tracking within the app for cases of emergency so the protective forces can locate the Deaf client.

- b. Designate a hashtag or code (number or letter) for the Deaf to message/send a specific code for certain types of emergency in case the client is unable to compose a message.
- c. The messaging or app service must be free of cost and given full attention all the time so a system for quick alerting will be needed, to ensure a quicker response timeframe of service provided for the Deaf

9) Proposal IX: Third Party Bill Management and Fault Notification

- a. Question 9: Do you agree with the proposal. Please justify your position and provide supporting information and references.
 - i. Agreed
 - 1. This should be an option, and not a requirement, for all PWD's. PWD's including the Deaf are entitled to equivalence of choice.
 - 2. Some utility companies have a method of communicating on emails labelled "no reply;" that means if someone tries to respond to their email, it does not get to them. This must be eliminated.
 - a. Alternatively, there has to be an email address that allows incoming responses.
 - 3. Video relay services need to be implemented as part of this for communication regarding fault notification or any other information by the Deaf

10) Proposal X: Facility for Subscribers with Disabilities to Register Requirements

- a. Question 10: Do you agree with the proposal. Please justify your position and provide supporting information and references.
 - i. Agreed
 - 1. As long as there is registration for all people- those with disabilities and those without disabilities, we would support allowing the specific information as delineated in point 5.11.1 to be recorded for the sole purpose mentioned within, to be part of registration for those with disabilities as an option to be consented to by the PWD's.
 - 2. There were recent incidents where the Deaf were told this in cases of internet disconnection or application for new internet connection package: When you talk to customer care, they say, "give me a number of someone I can 'TALK TO' so I will know how to reach you"? Why can't they reach us any other way? This has to be discouraged so the Deaf are able to handle their personal matters directly through accessible format

11) Implementation Timeline Question 11:

- a. Agreed
 - i. The implementation phase has to begin sooner than later because it has been long overdue. So the question asked was: When does implementation of these measures begin?
 - ii. Table 1 on page 52- Implementation timeframe of the measures being launched for telecommunication accessibility within all the licensees' operations? Or of the telecommunication accessibility service once availed? The proposed activities within the timeline appear to incorporate both contexts.
 - iii. What is meant by "as soon as is technically feasible?" This needs to be clearly defined.

12) 6.2 Formalisation of the Certification of Disability Process

a. Agreed

- i. The certification of disabilities to be made available in major towns of each parish is supported as long as the process is equitable, responsive to the dignity of PWD's, and respectful with flexibility for PWD's to provide certified reports from other regions.
- ii. Currently, the Chief Medical Officer of each MOHW region and the JCPD are the only two entities certified to validate the disability type of PWD's. For those who are deaf and hard of hearing, their hearing statuses are determined by audiologists to be verified by diagnostic hearing reports.
- iii. The Disabilities Act and the attendant Codes of Practice should be consulted for the national classification and definition schemed in terms of ensuring proper and standard terminology to maintain respect for the diversity and dignity of PWD's.

13) 6.3 Question 13: Use of Inclusive Public Procurement Policy

a. Agreed

14) 6.4 Question 14: Creation and Promotion of Public Accessible Telecommunication/ICT Policies and Facilities

a. Agreed

- i. Incorporate basic JSL training as part of the steps as well

15) 6.5 Question 15: Creation of Awareness Programme

a. Agreed

- i. The greater the awareness, the greater the response and engagement of the broader Jamaican society in appreciating diversity and providing services and products in accessible format

16) 6.6 Question 16: Development of a Universal Service Disability Programme/Project

a. Agreed

- i. However, all stakeholders including the public customer service providers (JSP, NWX, Flow, Digicel, etc) within the public, private and disability sectors need to be held accountable to the regulations and policies and the provision of support services through regular monitoring and evaluation to be conducted by the OUR and JCPD as well as the disability sectors. The Broadcasting Commission (BC) has to be engaged, monitored and held accountable to mandating and ensuring full accessibility of media and televised services for all diverse groups, particularly closed captioning in televised and cable programmes for the Deaf

17) In Appendix 1, video relay services need to be recognised as one of the accessibility services/features for the Deaf community.

Additional comments:

The Deaf Community appreciates this consultation and requests that there is actual follow-through with the implementation of the proposed measures. We look forward to greater collaboration on this important and necessary policy-level implementation of the ensuring-accessibility initiative.