

THE JAMAICAN DEAF COMMUNITY

The *Deaf Community's Comments to the OUR Document Stakeholder Responses: 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.

RESPONDING TO THE OUR STAKEHOLDER RESPONSES - ZOOM MEETING ON 21/06/21 AT 7:00P.M. Submitted on June 23, 2021 and copied to all participating Stakeholders

Question	Consumer Advisor y Commit tee	Flow	JAD	JCPD	JSB	JAID	JDC
Proposal I: Special Plans for PWDs	Disagreed; PWD tend to not want to stand out, but options should be included for PWD to decide and choose from	Agreed; price paid should reasonably cover the underlying cost to provide the service plus a reasonable mark-up	Certification must be simple, no cost and fool-proof; consideration given for no-voice based plans but high volume of internet data	Agreed. Verifying the customer via the Certificate of (Disability) Registration (Disabilities Act, 2014, Section 13 (2) (3) (4)) reduces abuse of the provision for PWDs.	Disagreed; 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	Yes, we agree with the proposal. 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 Aecessibility Plan where you present proof of disability. For Jamaicans that would be a duly issued card fro the JCPD thereafter, theperson 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 https://www.att.com/ecms/dam/att/consumer/helpp/pdf/TAP-disability-certification-form.pdf	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

					<p>use. If the OUR supported this philosophy deaf persons could choose only to pay for text.</p> <p>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</p>		<p>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.</p> <p>3. Cable box and local apps including the Digicel 'PlayGo' app are currently without closed captions or subtitles, which need to be</p>
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					services are targeted will fail to benefit.		addressed.
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Comments from the Jamaican Deaf Community:

One commentator responding to the CACU:

CACU-A: The statement that, "Persons with disabilities tend not to want to stand out through certification" is a generalised statement which is not true for everyone with disabilities however caused (heredity, acquired). The fact is, some persons with disabilities have been known to cause undue hardships for themselves and others, due to the unwillingness to declare their challenges. They want public awareness, yet at the same time hide the same awareness. Or like non-voters, let others do it, but the eventual benefits will be theirs as well. It is like giving an impressive resume about yourself, then fail disappointingly because nobody knew how best to accommodate you. This awareness should be discretely shared though because certification helps minimise or eliminate certain types of misunderstandings. One Deaf writer with physical disabilities, for example, would say to Flow and or Digicel, "I am Deaf, so I cannot hear like the way you do. In addition, please let me sit down because my physical disabilities make it difficult to stand for more than five minutes." Such admittance oftentimes generates empathy and understanding. Disability pride is fortunately a trending phenomenon now a days. It is the kind of pride that tells the truth, not hide it.

CAUCA-C: This Deaf writer had a telephone post-paid balance this month June, of minus nineteen thousand dollars -\$19000. This is a post-paid plan that include other thing in the package. Then each month have to pay four thousand dollars (\$4000) to keep the service active. Imaging paying for features and services that are of zero benefits to a Deaf customer. We cannot give our phones to some opportunistic thieves to answer the voice mails for us , or to people who cannot interpret for us to know what the voiced caller is saying. Considerations must be given to those of us who cannot pretend to be anything other than our true selves. What is the point of forcing us to take the same thing like *everybody* else? Equality cannot be enforcing when we hide diversities underneath the carpet, or when we complain, "How dare you have that and not me too!"

With all due respect CACU, direct interfacing and fellowshipping with persons with disabilities of all kinds is recommended. We hope that this fellowship with us will eventually help to modify your perspectives, which, if left as is, will create more harm than good for not only us but you too. Get real persons with disabilities on your committee please. Thanks.

Proposal II: Provision of Accessible Devices	Not fully agreed. It makes PWD look like they cannot make an informed	Unclear on the business model to ensure third party distribution channels; may work but some apps may only work for specific	Show benefits of certain devices and services-compatible with the baby monitor? Or Deaf grandfather?; demonstration room for an English to JSL	Agreed. Based on the CRPD (Article 2) and the Disabilities Act, 2014, (Part I, Section 2) reasonable accommodations and	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	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	Agreed 1. Customer care will need to provide sign language access for the Deaf Community. Create video relay services to
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	purchas e.	groups of PWD's	translation ap; trained staff in JSL or availability of JSL interpreter	reasonable arrangement s should be made for PWDs while ensuring no cost barriers are created.	do offer reasonable return policies, E.G. PriceSmart.	large numbers. For remotes fewer buttons or 1 touch features and easy access to needed functions.	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 mispronunciati ons.
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Comments from the Jamaican Deaf Community:

<p>Proposal III: Provision of Bills and Contracts in Accessible Format</p>		<p>Accepts that bills and contracts to PWD's be provided in a format; may be difficult for certain groups like those with cognitive disabilities; registering alternative bill medium should be facilitated subject to technical and economic feasibility and other options that meet the customers' needs</p>	<p>Keep terms and conditions simple; use deaf-friendly terms and jargons; have facilities in accessible format for the Deaf and Hard of Hearing</p>	<p>Agreed. It is to be noted that Easy Read format, simple and clear language benefits not only PWDs but even persons without disabilities. It is required that products and services are universal designed as cited within the CRPD (Article 2) & Disabilities Act (Part I, Section 2) definition of access. Providing bills and contracts in accessible formats promotes the dignity and independenc</p>	<p>Agreed.</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>Agreed 1. Produce JSL videos explaining the bills and contracts for the Deaf community in the absence of live translators</p>
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				e of PWDs and others.			
Proposal IV: Provision of General Information on Services in Accessible Format		Agreed; but it can be challenging for each company to achieve this outcome for all types of disabilities, especially in the short-term but should be encouraged to make good faith efforts, complying with the Web Content Accessibility Guidelines	Note the specifics of the need of the end users who are PWDs. For example, Deaf and Hard of hearing must have information presented simply, videos must have closed captioning and/or sign language insets. 2. Electronic bill boards can be used to advertise products and services offered by telecommunication providers. They must have a universal appeal so that	Partially agreed. We agree with 'a' & 'b' however; if the standard for WCAG is already met, we are uncertain of the need or practicality for 'c' which seem to be recommending a separate web page for PWDs. To enable equity and equivalence, PWDs should be able to navigate any area of the website they need - this will enable greater inclusion thus striking the balance, in	Agreed (with addition) This proposal should also cover information included in their mobile apps.	Yes, we agree with the proposal. 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 accessible section must have automatic software that reads contents of page.	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.

			<p>there is Deaf inclusion as indicated by interpreter and closed caption thereon. Electronic bill boards in Half Way Tree, Cross Road, Naggo Head for instance, does not have advertisement in sign language. So Deaf feels excluded.</p>	<p>this instance, rather creating a separate page for PWDs only.</p>			
<p>Proposal V: Provision of Information to PWDs on the Products and Services Suitable for Them</p>		<p>Supported</p>	<p>Note the specifics of the need of the end users who are PWDs. For example, Deaf and Hard of hearing must have information presented simply, videos must have closed</p>	<p>Agreed. In addition, include the information on their websites and in Easy Read formats thus enabling full access.</p>	<p>Agreed.</p>	<p>Yes we agree with the proposal. As it relates to the publication of information. Information must be clear and concise and use mostly pictures or symbols to relay the information for persons with Cognitive impairment. For customer service, agents must be trained on how to communicate with persons with varying disabilities.</p>	<p>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.</p>

			captioning and/or sign language insets. This applies to all forms of advertisements.				
Proposal VI: Accessible Customer Support Services		Supported except that seeking to impose a dedicated facility but rather that staff trained to care for PWD's needs are available	This needs to be clear as to what it looks like for each disability grouping as the needs may differ. For example, to be able to address the needs of clients who are Deaf or Hard of Hearing, staff must be able to use Jamaican Sign Language or ready access to JSL interpreters at the customer service locations.	Agreed. PWDs or their caregivers may require such service to enable their right to redress and so dedicated support services are necessary to facilitate same.	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".		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

							<p>advanced training may be prompted for further assistance.</p> <p>ii. There must be a system for the Deaf community to message when requesting customer care and support services</p> <p>iii. Video relay services will need to be part of this as accessible customer support services</p>
<p>Comments from the Jamaican Deaf Community: We agree that all staff members be provided sensitisation and orientation to diverse types of disability and be aware of how to relate to people with disabilities with respect on a regular and consistent basis. Provide intensive training to a minimum of 5 persons per company or service provider as there may be staffing changes to avoid any loss of necessary and appropriate customer services for Persons with Disabilities and, when the need arises, the company or service provider needs to enlist professional Jamaican Sign Language (JSL) interpreting services for meaningful and inclusive interactions with the Deaf.</p> <p>Consider employing Persons with Disabilities at Customer Service Centres so they can also assist with customer care. Front line services employees sharing the same disability experience as the customers to address any related customer-service matters has proven to be as effective.</p>							
Proposal VII: Accessible Directory Assistance Services		Does not object but the requirement for a license to provide a free printed		Agreed. The online directory may not be easily accessible to all PWDs.	Agree with caveats. 1. Licensees shall provide subscribers that have a vision impairment	Yes we agree with the proposal. Note though that process to access same must be one touch.	Agreed 1. Although this most relates to persons who are blind

		<p>telephone directory could prove onerous/difficult as some directory business is handled by non-licensees.</p>		<p>Since a charge has been applied, it excludes customers with visual impairments who depend on this service but are unable to afford it. It has been noted that since this charge was implemented, the JCPD has been relied on heavily to provide telephone numbers for clients who are Blind specially to facilitate them accessing support services and the entity inadvertently absorbs the cost</p>	<p>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</p>		<p>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</p>
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				which is not a long-term solution. Service providers should therefore allow equivalence of access by providing that service free of cost.	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.		
Comments from the Jamaican Deaf Community: Acknowledged							
Proposal VIII: Accessible Emergency Services		Supported, subject to technical feasibility; will require a reasonable time to assess feasibility and implementation	Will the emergency centres be able to respond to the PWD who is texting for help for further details such as to identify their location, cause of distress etc. What if person is illiterate and cannot read very	Agreed. Since persons without disabilities can call back and respond verbally in times of emergency, PWDs with varying modes of communication such as JSL or other modes of communication should have the same means	Agreed.	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.	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. Availability tracking within

			well? Or has dexterity issues	of accessing emergency services to enable their safety at no cost to them. This should include sending messages via voice notes, SMS, video calls etc to emergency services and then allow for tracking of the location of the individual.			the app for cases of emergency so the protective forces can locate the Deaf client. Page 3 of 4 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
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							quicker response timeframe of service provided for the Deaf
Comments from the Jamaican Deaf Community: Acknowledged.							
Proposal IX: Third Party Bill Management and Fault Notification		Supported, with it being appropriately included in contracts	the process is timely and completed within a reasonable time frame. The Disability Community is hopeful of this. However, there needs to be consideration for training of staff in the needs of PWDs. For example, persons who are Deaf will need to have access to staff or contracted personnel who are competent in Jamaican Sign	Agreed. The Disabilities Act, 2014 (Section 2(1)) defines the caregiver in such instances and the PWD is given the option to name such an individual in instances where a relative is not available or is not the caregiver. This will enable suitable representation of the PWD and their	Agreed.	We agree to the proposal. This would be most beneficial while other aspects of the proposal are being finalized such as Proposal III. PWD always need an advocate other than themselves so this person could assist in navigating all these processes.	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.

			Language. PWDs need to be also kept abreast of progress and/or challenges.	concerns to the service provider. The named representative should agree in writing/ as part of the contract.			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
<p>Comments from the Jamaican Deaf Community: Persons with Disabilities and members of the Deaf community need to decide whether to consent to the third party bill management and fault notification. This also recognises the need and right of the Deaf to request or work with an interpreter when to communicate with the companies or service providers when making phone calls. Enabling video relay services will instrumentally assist to resolve communication barriers between the Deaf and service provider.</p>							
Proposal X: Facility for Subscribers with Disabilities to Register Requirements		Supported	Deaf persons have a responsibility to admit the need for special consideration, so that, equivalence of access and choice can be theirs too.	Agreed. The system for registration of such information being created by service providers should be accessible to persons with	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	We agree with the proposal. Please refer to document in Proposal 1	Agreed 1. As long as there is registration for all people- those with disabilities and those without disabilities, we would support

			<p>Permanently Deaf and Hard of Hearing persons must not be required to pay for Certification of Deafness, every time they need a new phone or computer or a new compatible communication aid to buy. Organizations, schools and vocational centres interfacing with Deaf people should be certification centres.</p>	<p>varying disabilities thus enabling them to independently provide their information for this service provider. The information should be protected and kept and utilize for the use it was agreed when provided (Data Protection Act, 2020).</p>	<p>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</p>		<p>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</p>
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					<p>registering as a person with disability. The example given in 5.11.2 does not support the argument made.</p> <p>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.</p> <p>4. One reason for the low number of persons registered as disabled is that</p>		<p>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</p>
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					<p>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)</p>	
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Comments from the Jamaican Deaf Community:

It should be an option for Persons with Disabilities to agree to such registration or not, without enforcing same on anyone. The registration form would need to be the same for everyone- those with disabilities and those without disabilities- to volunteer at sharing however much information is needed. It should never be a requirement for any one people group.

One commentor responding to the Jamaica Society for the Blind:

Whilst one may not need to register to use "care lines" at the banks, there have been instances where qualified persons the commentor have been shooed away because they did not look care worthy enough by bank officials. Luckily for the commentor, they usually apologise after the commentor showed the JCPD identification card. On planes the commentor has to carry the JCPD card discretely around the neck to show the certification of disability to the flight attendant, relax, enjoy the flight knowing they will remember, to avoid missing out any announcement. What if there is a plane crash and the authorities need to find out whose body is this? Certification is necessary. Certification can help one to get humane support.

Imagine someone telling you that you are not blind enough to get a specialised telephone for the blind! or you better try “ readmimouth” because the cost of interpreter cannot be afforded! Or if you can hear a gunshot or an explosion, then you don’t really need special attention. The document by OUR should be embraced to a great extent. It is rightly saturated with the views of the Coalition on the Rights of Persons with Disabilities (CRPD).

<p>Proposal XI: Timeline for Implementation of Measures</p>		<p>Minimum timeline is 9 months, to best start on April 1, 2022, to allow enough time to plan, design and implement</p>		<p>Agreed with timelines, except for the response for Emergency Services. A timeline is essential for this activity as it could take an inordinately lengthy time to wait for technical compatibility . Consultation is required to work through a reasonable timeframe for all concerned.</p>	<p>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).</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>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</p>
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							<p>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.</p>
<p>6.2 Recommendations: Formalisation of the Certification of Disability Process</p>		<p>Seem reasonable and necessary</p>	<p>Jamaica Council for Persons With Disabilities (JCPD) has a registry of persons with Disability. JCPD is responsible for issuing Disability ID cards. Due to Covid-19 situation, Deaf and Hard of Hearing persons can</p>	<p>Agreed. Regarding Recommendation I, the Disabilities Act, 2014 mandates the JCPD to register and provide a Certificate of Disabilities to registered PWD. The JCPD established under the Disabilities Act will have</p>	<p>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</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>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. https://apps.who.int/iris/bitstream/handle/10665/41003/9241541261_eng.pdf;jsessionid=70128755D26006CFEA1AF7700F20A736?sequence=1</p>	<p>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</p>

			<p>take a passport size photograph, their outdated JCPD ID card and \$400 to JCPD to be processed for the rebranded version of JCPD Disability ID card. This approach is simple and quick.</p>	<p>registration access points island-wide to facilitate registration of PWDs. Over the years registration has been prohibitive for varying reasons, however, with the provision of the certificate of disability to access benefits, registration will greatly improve. Regarding Recommendation II, the Disabilities Act defines disability (Section 2 (2)) and there exists a classification and definition of</p>	<p>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</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>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</p>
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				the different types of disabilities which can be provided by the JCPD or can be accessed in the International Classification of Functioning, Disability and Health, WHO, 2001.	that the focus is maintained. 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.		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.
<p>Comments from the Jamaican Deaf Community: Appropriate terminology regarding persons with disabilities for the type of disability must be derived from the Convention on the Rights of Persons with Disabilities (CRPD) and the Disabilities Act. Acknowledgement of indicated preference on disability definition for certification by Persons with Disabilities who are being served is to also be the standard practice.</p>							
6.3: Inclusive Public Procurement Policy		Needs to be given more thought	An inventory/audit must be done to identify who are the Deaf people who will benefit best, better and somewhat from this device versus that device,	Agreed. Accessible ICTs will not only benefit PWDs but other users as well. As such, procurement policy will be beneficial to all of society.	CH: Agreed.		Agreed

			<p>on the telecommunication market. In other words, procure according to needs. Procurement must take diversity of needs within the Deaf community</p>				
<p>6.4 Public Accessible Telecommunication/ICT Policies and Facilities</p>			<p>Promoting awareness of accessible public access facilities among Deaf persons : Such promotion would include the use of appropriate signage to advertise that these public access facilities are accessible. 2. Ensuring that emergency communications and exits</p>	<p>Agreed. Based on the reasonable arrangement in the Disabilities Act, 2014 and reasonable accommodation in the CRPD it becomes an obligation of the service provider to facilitate access of PWDs.</p>	<p>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.</p>	<p>We agree with the recommendation. Also we ask that you consider the following for accessible facilities: 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. 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.</p>	<p>Agreed i. Incorporate basic JSL training as part of the steps as well</p>

			provided in public access facilities are accessible for Deaf and Hard of Hearing persons.				
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Comments from the Jamaican Deaf Community: Engage at least two persons with disability representing the community in discussions on the necessary policies and facilities to promote inclusion of all diverse individuals.

6.5 Creation of Public Awareness Programme		Seem reasonable	Must be consistent and inclusive of Deaf persons' contribution; use Deaf persons to demonstrate and delivery news	Agreed. Such synergy around a public awareness programme would expand understanding, increase knowledge and buy-in on ICTs, access and the services that exist, generally and specifically for PWDs.	CH: Agreed.	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.	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
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Comments from the Jamaican Deaf Community:
One commentor responding to the Jamaican Deaf Community:

There is the need for the public to go beyond just knowing basic sign language. “Basic-fication” has a way of encouraging watered down interpretation of important matters. It encourages the never-mind attitudes e.g. “OUR wants betterment for PWDs”. Just 5 words. But, in reality, OUR’s dream for betterment is way more than basically 5 words. The signing one say TV reporter said, “Riot downtown Kingston” (3 basic words), yet we see that the signer is still listening to something else on the same news. Adult Deaf do not need baby-talking-to, they want to know the rest of the story.

OUR, please help Deaf and Hard of Hearing communities to see an inclusive communication situation where justice to our communication needs does not just appear to be served, but most definitely so! Away with interpreter insets that are sometimes almost smaller than our eyeballs. Away with the interruptions in signing flow where the interpreter is shown on and off! We deserve better than this! Thank you for the consultation with us.

Make sure to use appropriate, viewer-friendly interpreter insets to accommodate ease of viewing- side by side or bigger inset screen- and avoid any interruptions in signing flow where the interpreter’s inset is shown on and off when presenting other information.

<p>6.6 Development of a Universal Service Disability Programme/Project</p>		<p>Seem reasonable</p>	<p>Agreed</p>	<p>Agreed. PWDs are sometimes unattached to any disability organization or educational institution and so a more meaningful provision could be developed out of an evidenced based approach. Subsidized or free Relay Service should also be considered</p>	<p>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 recommendation s I tried to find supporting information. 3. For a blind person, having questions below the proposal or</p>	<p>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.</p>	<p>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</p>
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				<p>from these funds. Educational and/or employment opportunities could increase for PWDs if there is a targeted approach to making ICTs available to all PWDs.</p>	<p>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.</p>		<p>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</p>
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