



TELECOMMUNICATIONS  
INDUSTRY ASSOCIATION

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September 25, 2015

ATTN: Lic. Ileana Gisela San Juan Rivera  
Director of Information and Accessibility  
Federal Telecommunications Institute (IFT)

**RE: PUBLIC CONSULTATION regarding "Proposed Draft General Guidelines on Accessibility to Telecommunications Services for disabled users"**

The Telecommunications Industry Association ("TIA"), supported by numerous member companies that manufacture and supply information and communications technology ("ICT") equipment to the providers of mobile telephone service, who are subject to the Federal Telecommunications Institute's ("Institute") regulations, hereby submits input to the August 2015 Public Consultation<sup>1</sup> on "*Proposed Draft General Guidelines on Accessibility to Telecommunications Services for disabled users (Draft General Guidelines)*." TIA represents approximately 400 global ICT manufacturer companies in the mobile wireless, broadband, information technology, network, cable, satellite, and unified communications environments. TIA's members empower communications in every industry and market, including healthcare, education, security, public safety, transportation, government, the military, the environment, and entertainment. For more information on TIA, please visit <https://www.tiaonline.org/>.

The global ICT manufacturer and vendor community actively works to enhance the accessibility of telecommunications products for consumers with disabilities. Our members actively engage with consumers in the design of products, proactively initiate industry-led consensus development of standards that enhance accessibility, and engage governments across the globe. TIA believes that the most effective way to enhance accessibility of advanced communications devices and services for consumers with disabilities is to take a balanced approach that provides clarity and feasibility in regulation and adequate flexibility to innovate products and services.

Consistent with these principles, we provide comments regarding the most effective way to facilitate successful implementation of some of the requirement in the *Draft General Guidelines*.

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<sup>1</sup> <http://www.ift.org.mx/industria/consultas-publicas/consulta-publica-del-anteproyecto-de-lineamientos-generales-de-accesibilidad-los-servicios-de>



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## Article 16

In Article 16, the Institute directs mobile telephone service providers to provide a listing of terminal equipment designed for people with disabilities. TIA would like to emphasize the importance of harmonization and consistency of approaches across countries as you consider new rules to ensure consumers with disabilities have access to information about accessible telecommunications services and products. Currently, manufacturers are already voluntarily providing information on the accessibility of mobile phones, tablets, and mobile apps through the Mobile Manufacturers Forum Global Accessibility Reporting Initiative (GARI) database. The GARI database provides comprehensive information on many of the features listed in the *Draft General Guidelines*. The GARI is freely available to the public on the web in Spanish and allows consumers to search for devices and apps based on their specific needs. Many regulators around the world have adopted the GARI, allowing industry to voluntarily self-declare the accessibility features of mobile phones. Indeed, even the Institute, has recognized the value of the GARI and provides a link to it on its website. The global adoption and use of the GARI has proven successful in providing accessibility information to people with disabilities.

In addition, manufacturers' websites can serve as an important avenue by which they disseminate information on telecommunications product models and specific features that address different accessibility needs. This is an important tool because it can provide consumers with immediate, up to date information about new equipment and features. Manufacturers are actively engaging with consumers and thus, are making a proactive effort to ensure that accessibility features are highlighted in the product information provided on their websites. Therefore, we encourage the Institute not to adopt a rigid requirement for a separate catalog listing but rather allow mobile telephone service providers to use existing databases that will provide a modern, usable, and up to date mechanism for meeting the objectives of this rule.

## Article 18

Furthermore, with respect to Article 18, we note that manufacturers currently provide detailed instruction manuals with their devices when purchased. These manuals, while not specific to accessibility capabilities, provide a host of information to users about how to enable and utilize the various features including those designed to provide a better experience for users with various kinds of disabilities. These guides are available to users in physical form in the original packaging when purchased as well as online and sometimes in the form of an app. We think it is important to note that each consumer is different and their specific needs and preferences on settings may vary. ICT equipment manufacturers spend significant time designing and building devices with a host of features that can be modified and adjusted to suit each consumer's needs. This means that, in addition to those features designed to address a specific disability, there are a host of features that may also accommodate and improve the experience for all consumers.

As a result, we believe that the existing guides, that provide extensive information about the devices, effectively meet the needs of all kinds of users to aid in understanding how to make the settings fit



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their needs. To require separate guides or tutorial videos would be overly burdensome and may result in increased costs to develop the product. In addition, these guides in conjunction with the GARI, already provide users with information about the major programs and accessibility applications mentioned in this Article. We encourage the Institute to adopt an approach that affords industry the flexibility needed to determine the most appropriate way to meet the desired outcome.

TIA appreciates the consideration of the Institute in this matter, and we urge you to contact the undersigned with any questions or concerns.

Respectfully submitted,

**TELECOMMUNICATIONS INDUSTRY ASSOCIATION**

By: /s/ Avonne Bell

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