

TECHNOLOGY

TIA Presentation:

ICASA's Proposed Code for People with Disabilities Regulation

July 10, 2014

POLICY

MARKETS

The TIA logo is centered within a dark grey circle. It consists of the letters 'TIA' in a bold, white, sans-serif font. A red swoosh underline is positioned beneath the letters. A registered trademark symbol (®) is located to the right of the 'A'.



Telecommunications Industry Association

- Represents ~400 information and communication technology (ICT) companies
- Policy and advocacy leadership
- Technology and standards development
- American National Standards (ANSI) accredited standards development organization
 - 12 engineering committees
 - 12 international advisory groups
- Please visit <http://tiaonline.org/>



TIA's Accessibility Mission

- **The TIA Accessibility Working Group (AWG) provides a forum for addressing existing and emerging accessibility related issues and events for member companies.**
 - AWG also serves as a conduit for constructive dialogues with the disability community.
- **Encourage innovation in the development of ICT accessibility solutions.**
- **Increase the accessibility of technology for those with disabilities.**
- **Development of accessibility solutions through voluntary, consensus-based standards process**
- **Proactive consultation with the disability community.**
- **Work with government regulators across the globe.**
- **Please visit <https://www.tiaonline.org/policy/accessibility>.**



General Views on ICASA's Proposed Regulation

- **The global ICT manufacturer and vendor community works to enhance accessibility for consumers with disabilities.**
- **Accessibility can be enhanced by taking a balanced regulatory approach, giving clarity and feasibility.**
- **Technical regulations should rely on standards as “safe harbors” –**
 - **Compliance with the standard means acceptable performance, while other methods of achieving the regulation's goal are still permissible.**



Provide Clarity on the Product Scope of the Regulation

- **Confirm that the Regulation applies only to consumer products (and no other kind).**
- **Indicate which class of consumer product each Section or Clause applies to.**
 - Ex: Clause 3(a) of Section 5 should apply to wireline telephones and not wireless
- **Allow for a portfolio approach to product accessibility – licensees may comply by sufficiently offering models across portfolios.**
 - It is not feasible (from a technical or cost perspective) to require Electronic Communication Service (ECS) providers to include all features on all products
 - allow for different accessibility criteria to satisfy requirements via different targeted solutions (e.g., for hearing loss, vision loss)
 - This approach would be consistent with accessibility regulations in many other areas of the world



Ensure Feasibility & Flexibility for Implementation of the Regulation

- **Keep compliance costs to a minimum and allow for flexible implementation of the regs (ex: supplier declarations of conformity [SDoCs]).**
- **Apply the Regulation only to new products submitted for certification after the Regulation's implementation date.**
 - Not feasible to add features to products already in the stream of commerce.
- **Provide a phasing-in period (a minimum of 18-24 months) after publication in the Government Gazette – specifically Section 11.**
 - Time needed for manufacturers to design and integrate any additional required features after the effective date of the final ruling.
 - Consistent with the approach taken by many other governments, allowing eased importation of accessible ICT from other markets.



Hearing Aid Compatibility for Wireline Handsets in Sec. 5 Clause 3(a)

- **Clause 3(a) of Section 5 should apply to wireline telephones**
 - The technical features of wireline and wireless telephones substantially differ, and 3(a)'s requirements are only technically applicable to wireline telephones.
- **Clarify 3(a) and 3(a)(1) to mean that a wireline telephone must provide a magnetic field for coupling for hearing aids and cochlear implants that have a telecoil (“T-coil”).**
 - ICASA should not require all mobile phones offered by a licensee to have a T-coil, which is implied in the statement of in 3(a)(1) “...a built-in hearing aid coupler”



Hearing Aid Compatibility for Wireline Handsets in Sec. 5 Clause 3(a)

- **Include ANSI/TIA-1083-A as a safe harbor in the regulation for compliance with the requirements in Clause (3)(a)(1) of Section 5.**
 - ANSI/TIA-1083-A defines measurement procedures and performance requirements for the handset generated audio band magnetic noise of wireline telephones, and plays a significant role in efforts to reduce interference problems experienced by people using hearing aids with wireline digital cordless telephones.
- **Include ANSI-TIA-4965 and ANSI/TIA-4953 as safe harbors in the regulation for compliance with requirements on wireline telephones in Clause 3(a)(ii) of Section 5; wireless phones are out of scope for this requirement.**
 - ANSI-TIA-4965 provides an accurate method of measurement (called “Conversational Gain”) for hearing aid compatibility volume control gain requirements for wireline equipment.
 - ANSI/TIA-4953 uses Conversational Gain as the volume control measure for specialty high-gain amplified telephones. It also provides requirements for voice tone control and ringer acoustic level and tone control for people with mild, moderate, or severe hearing loss.



ICASA Proposals for Visually-Impaired or Blind Consumers

- **As devices rely increasingly on software that can be individualized by the user, it is preferable for ECS licensees' devices to have flexibility in how they provide disability access functions.**
- **Reconsider the proposal that ECS licensees make provision for “tactile keys for both functions and alphanumeric keys” in Clause 4(9) of Section 5.**
 - Many devices today, especially touch screen devices, do not utilize tactile keys except for the on/off function or volume control. As proposed by ICASA, this regulation would require a complete redesign of such devices to add tactile keys for the functions listed, and would require fundamentally changing the nature and design of those devices.



ICASA Proposals for Visually-Impaired or Blind Consumers

- **Clarify proposal that a required feature for all telecommunications devices include “Automatic Responses” (programming on a wireless device to “answer automatically or redial certain calls or messages”) in Clause 4(12) of Section 5.**
 - TIA requests further clarity from ICASA on the intent and expectations of requiring such a feature(s) in the proposed regulations, as well as the specific scope of the expected feature(s) to address this proposal, so that stakeholders may provide meaningful input to ICASA on what is currently offered to address this proposed criteria and what is technically viable.
- **Reconsider proposal that a required feature for all telecommunications devices include “Tactile Keys” for such features as “volume control, on/off, shortcuts for speed dialing, assignable ringtones and alerts or automatic answering” in Clause 4(15) of Section 5.**
 - These features are not all typically programmed via separate tactile keys, and requiring this feature is not feasible from a technical feasibility and cost perspective.
- **Rely on the Global Accessibility Reporting Initiative (GARI) for reporting requirements in proposed Clause 4(17) of Section 5.**
 - Would increase the efficiency of compliance for both the manufacturers of mobile devices as well as ICASA’s associated efforts to collect and maintain such information, because any reporting requirements would be harmonized with existing requirements already relied upon by numerous countries.



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Questions?

