Accessibility in the New Telecom Policy 2011

This submission deals exclusively with the issue of accessibility in telecommunications for persons with disabilities, which has been left out of NTP 2011. We outline below in some detail the rationale for including accessibility in the NTP

Demographic case:
The 'World Report on Disability', issued in June 2011 by the World Health Organization in cooperation with the World Bank, estimates that over a billion of the world's population lives with some form of disability.[1] According to World Bank estimates, 20 per cent of the world's poorest people are disabled and are understood to be the most disadvantaged sections of society.[2] The global literacy rate for persons with disabilities was reported at approximately three per cent in 1998 by UNDP.[3] Whether due to discrimination or an inability to work, the unemployment rate amongst the disabled is very high, almost 80 per cent in some countries. In India, while there are no accurate statistics on the number of disabled or their access to ICT, education and employment, it is commonly believed that the number of persons with disabilities can be safely estimated to be above 70 million. Added to this is a vast population of elderly and illiterate persons who are unable to access mainstream telecommunications services as are available today.

Legal case:
India has signed and ratified the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD) and is therefore obliged to ensure the human rights under the UNCRPD, including those of education, employment, to life and access to information and communication technologies and to treat persons with disabilities on an equal basis as others. Even under domestic law, our constitution recognises equality and non discrimination as important guiding principles and under the prevailing as well as new draft disability laws. We are committed to ensuring access to information, ICTs and all other aspects of social life which are essential to enjoy the right to life.

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[1] http://www.who.int/disabilities/world_report/2011/en/index.html
[2] http://www.un.org/disabilities/default.asp?id=18
[3] Ibid.

Global best practices:
Countries around the world, both developed as well as developing have recognised the important role that ICTs play in connecting the disabled, and also that special efforts and measures need to be taken to promote accessibility of and access to telecommunications facilities and services for persons with disabilities. For instance, Australia, Argentina, Brazil, Canada, Chile, France, Japan, Malaysia, South Africa, Sri Lanka, Sweden, USA, UK and many other countries in the European Union have at least one if not multiple policies and legislations to promote accessible telecommunications and these include both provisions in mainstream as well as exclusive policies. Similarly at least 17 countries around the world have specific provisions for connecting the disabled and providing services through their universal service funds. Many of these countries have included the aim of connecting the disabled as a goal in their national policies and then gone on to achieve this through specific policy initiatives. It is important to identify this as a national commitment within the policy to ensure adequate follow up.

Challenges to disability access to telecommunications in India:
Given below are a few key challenges impeding disability access to telecommunication and ICT services in India today:

- Unaffordability of telecommunications products and services for persons with disabilities living below the poverty line and in rural areas.
- Unavailability of compatible assistive technologies in local languages and at affordable rates.
- Absence of special enabling measures such as provision of hearing aid compatible phones, priority assistance in repairs, low tariff on basic telephony services, accessible services and customer care,
- Absence of a national relay service and emergency service system.
- Unavailability of low cost handsets in the market which are compatible with assistive technology.
- Failure of mainstream programmes and initiatives to reach out to persons with disabilities, for instance the Common Service Centres need to be made accessible to all.
- Inaccessibility of broadcast services: includes inaccessibility of hardware like set top boxes which can at present not be navigated by blind persons, as

well as inaccessibility of TV programmes because of lack of captioning and descriptions.

Recommendation

Given that there is a lot which needs to be done to connect persons with disabilities to the information society, we strongly urge the DoT to clearly identify this as a national goal under the policy. Without this, it will be difficult to ensure that adequate programmes and policies are created to make telecommunications accessible and universally available and persons with disabilities will be unable to enjoy even the basic rights of life such as the right to health care, to information, education, employment, recreation and many more. Finally we would also like to stress that mention of accessibility in NPIT and other policies alone will not suffice to ensure accessibility of telecom services. While those do govern accessibility of web sites, standards and content, the NTP will take care of accessibility of telecom services like broadband and fixed and mobile telephony, as well as of products. Given that today a large and ever increasing number of persons are relying solely on mobile phones to communicate and transact, creating an accessible telecommunications environment becomes an inevitable priority goal.

Annexure – List of Signatories

1. Accessability (Delhi)
2. Alternative Law Forum (Bangalore)
3. Andhjan Kalyan Trust (Gujrat)
4. Arushi (Bhopal)
5. Blind Persons' Association(Ahmedabad)
6. Blind Relief Association (Delhi)
7. Centre for Internet and Society(Bangalore)
8. Daisy Forum of India(Delhi)
9. Deafway(Delhi)
10. Deaf Mutes Society (Ahmedabad)
11. Dr. Amrik Singh Cheema Foundation Trusts(Chandigarh)
12. Fourthway Foundation (Bangalore)
13. Indian Association for the Blind(Madurai)
14. Indian Institute for Assistive Technology(Mumbai)
15. Maraa (Bangalore)
16. Mitra Jyothi (Bangalore)
17. National Association for the Blind(Mumbai)
18. National Association for the Deaf(Delhi)
19. Saksham(Delhi)
20. Samrita Trust(Secundrabad)
21. Score Foundation (Delhi)
22. Sightsavers International (Mumbai office)
23. Society for Visually Handicapped (West Bengal)
24. Sruti Disability Rights Centre (Kolkata)
25. Technical Training Institute(Pune)
26. Third Eye Charitable Trust(Chennai and Kolkata)
27. Xavier's Resource Centre for the Visually Challenged (Mumbai)