

25 June 2008,

Department of Broadband, Communications and
the Digital Economy
GPO Box 2154
Canberra ACT 2601

By email: regulatory@dbcde.gov.au

Dear Sirs,

Re: Submission on regulatory issues associated with the National Broadband Network (NBN).

Vision Australia is the nation's largest provider of services to people who are blind or have low vision. It has been formed over the past four years through the merger of several of Australia's oldest, most respected and experienced blindness and low vision agencies. Our vision is that people who are blind or have low vision will increasingly have the choice to participate fully in every facet of life in the community.

To help realise this goal, we are committed to providing high-quality services to clients and their families in areas that include early childhood, orientation and mobility, employment, information, recreation and independent living. We also work collaboratively with Government, business and the community to eliminate the barriers people who are blind or have low vision face in accessing the community or in exercising their rights as Australian citizens.

The knowledge and experience that Vision Australia gains through its interaction with clients and their families, and also by the involvement of people who are blind or have low vision at all levels of the Organisation, means that it is well placed to provide advice to governments, business and the community on the challenges faced by people who are blind or have low vision fully participating in community life.

Vision Australia believes that it is important for us, as an organisation in the blindness sector, to make comment on regulatory issues associated with the National Broadband Network (NBN) currently being considered by the Commonwealth Department of Broadband, Communications and the Digital Economy (DBCDE).

People who are blind or have low vision, or have other print disabilities, comprise an important and numerically increasing segment of the population. In our opinion, ensuring that this community has access to affordable and technically accessible broadband services, is a key responsibility for legislators, policymakers, industry, and the community generally.

Vision Australia congratulates the Government for its strong commitment to strengthening Australia's broadband infrastructure and for having a vision that access to broadband will lead to social inclusion and building the economy.

Organisations such as Vision Australia have a growing reliance on broadband for day to day operational purposes. However our main reason for making this submission is to express just how important it is for the people we work with, that is, people who are blind, have low vision or other print disabilities, to have access to technically accessible and affordable broadband services.

People who are blind or have low vision, and people with other print disabilities still face many barriers to accessing print material. It is widely recognised that less than 5% of information available in print is made available to people with a print disability in accessible alternative formats such as Braille, audio, large print or navigable electronic text. However, the digital era and in particular the development of the internet has opened up a world of opportunity and possibility in regards to access to information.

Organisations around the world, such as Vision Australia are working to close the information gap through creating accessible materials and playback devices. However real access and social inclusion will only be achieved when the infrastructure for delivery systems for accessible digital content are in place and are affordable. The content developed by Vision Australia, which is now primarily in digital audio format, is currently delivered in a hard copy medium via CD in the post. Although delivery of accessible alternative format material by post has served us well for many years, a move to high speed broadband would certainly assist people with a print disability to access more information more quickly.

To make library and information services fully responsive to the needs of people who are blind or have low vision there will need to be broadband services that can transmit large files at high speed for minimal cost. The audio files that are created by accessible format producers such as Vision Australia are by their very nature large files that can take extended time to transmit. The cost of downloading these large files, both in time and service fees, will fall on the recipients.

Previous Governments have recognised that there can be an inequity created for people who are blind because the accessible format material they need is often bulky in nature. Government supports the cost of moving this material around the country through what is often referred to as "blind post". This is a funded program where the Department of Families, Housing, Community Services and Indigenous Affairs (FAHCSIA) provides a subsidy to Australia Post for the handling of materials for

people with a print disability. Recommendations such as those made through FAHCSIA's own research around print disability services indicate that consideration should be given to how best new delivery systems such as the internet could be utilised and subsidised to shift much of this material from surface mail to digital delivery.

Vision Australia encourages Government to review the "blind post" program to ensure that emerging delivery systems such as broadband can be utilised effectively and that not-for-profit organisations such as Vision Australia or people who are blind or have low vision are not disadvantaged as we move from postal systems to digital delivery for accessible materials. In particular Government could look at providing a subsidy, similar to that currently provided for energy and telecommunications utilities, to targeted individuals with a print disability for broadband services.

Many people who are blind or have low vision rely heavily on broadband services for numerous activities of daily life including shopping, downloading of reading materials, entertainment, social contact and communication. A good broadband network into the future has the potential to facilitate the provision of new and innovative services using audio/visual to connect with sighted assistance. It would enable readers to more efficiently obtain reading material through downloading from book repositories. It would also provide more realtime provision of transcription services using, for example, scan and email for reading, using voice synthesis or Braille output. It would also provide access to realtime social networking for those in the community, such as people who are blind, who are often socially isolated.

Vision Australia also believes that connecting Australia through high speed broadband will enable, and encourage, futuristic uses for such applications as realtime personal support services for people with a disability. This could include services such as using skype or similar products to enable a blind person to use voice and video to request assistance from a sighted person. It would also better facilitate the downloading of audio described movies.

In order to fully and effectively exploit high speed broadband services people with disability must have ready access to sufficiently powerful cost effective accessible hardware. This includes voice over ip telephony equipment, modems, set top boxes, all of which must be universally accessible to people who are blind. Currently, there are inherent difficulties of visual displays and inaccessible web interfaces on much of the existing equipment. Vision Australia is of the view that the regulatory framework must incorporate accessibility requirements, so that all aspects of digital services, including the development of content, delivery systems and access devices such as information kiosks and computer technology, are accessible to people with a disability.

Vision Australia recommends:

1. that Government consider providing a broadband subsidy to targeted individuals with a disability.

2. that regulation around the provision of broadband services be drafted to ensure that disability access is built in to all components including development of digital content, accessible web interfaces, associated hardware and software, delivery systems, and access points such as public information kiosks and personal computer technologies.
3. that Government review the “blind post” postal subsidy program to ensure that print disability service providers and individuals who are blind or have low vision are not disadvantaged with a move away from surface mail delivery systems to digital delivery systems for alternative format materials.

Vision Australia has vast experience in developing accessible digital content and in providing access solutions for people who are blind or have low vision. These access solutions include the provision of alternative format digital material to individuals, businesses and governments. We are recognised internationally as a leader in the field of adaptive technology and we would like to work with the Federal Government to ensure that in developing Australia’s broadband infrastructure and services the needs of people with a print disability are accommodated. In order to ensure that there is an understanding of access issues we would like to offer a representative team from the Department of Broadband, Communications and the Digital Economy a hosted visit to Vision Australia’s Kooyong site to view all aspects of how individuals who are blind, and how print disability service providers such as Vision Australia, utilise broadband services.

For any clarification on the above, or to arrange a hosted visit to Vision Australia, please contact me on 02 9334 3284 or via email to michael.simpson@visionaustralia.org

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