



5 Thomas Holt Drive
North Ryde NSW 2113
Tel: 02 9813 6780
Fax: 02 9813 6799
TTY: 02 9813 6790
info@ai-media.tv
www.ai-media.tv
ABN: 49 105 924 490

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Assistant Secretary, Networks Competition Branch
Department of Broadband, Communications and the Digital Economy
GPO Box 2154
CANBERRA ACT 2601

BY EMAIL: regreform@dbcde.gov.au

Dear Secretary

NATIONAL BROADBAND NETWORK (II)

Thank you for the opportunity to contribute to this review.

Find attached Access Innovation Media's submission on regulatory issues concerning the rollout of the National Broadband Network (NBN).

Additionally, we refer you to our earlier submissions to the following related inquiries:

1. National Broadband Network (I)
2. Electronic Media Access Inquiry
3. National Disability Strategy
4. National Mental Health and Disability Employment Strategy

We would be happy to contribute to further development of policy in this area.

Yours faithfully

Tony Abrahams
CEO

Access Innovation Media

Access Innovation Media (Ai-Media) is a social enterprise committed to working with stakeholders in the community, business, and government sectors to develop and deliver innovative, economic access solutions with global reach for people with disabilities and others with particular access requirements.

NBN as a driver of Social Inclusion

Ai-Media welcomes and supports the proposed NBN infrastructure to deliver accessible broadband to all Australians as a critical driver of social innovation and social inclusion. While the NBN could effectively eliminate the digital divide, it has the risk of exacerbating it if current realities of social exclusion are not addressed. We encourage a whole-of-government approach to bring everyone into the tent.

The NBN will enable access services (such as captioning and audio description) to be supplied on-demand to a wide variety of end-users in a multiplicity of situations (including classrooms, remote communities, workplaces, hospitals, doctors' surgeries, public places, homes, and mobile devices). These services will significantly enhance participation, education and employment opportunities for people with disabilities.

Ai-Media expects that the NBN will underpin the creation of sustainable jobs in new industries that will supply these access services, assisting greatly in meeting the challenges of the National Disability Strategy, and providing valuable reskilling opportunities for the broader Australian workforce into the 21st Century.

The NBN rollout carries the promise of access and inclusion for millions of Australians currently excluded or at the margins of society. These people must not be forgotten in debates about regulatory reform.

NBN for All Australians

It is difficult to conceive of a justification for excluding *any* Australian from the benefits of the NBN – as a core platform for the delivery of education, employment, information, government services, entertainment, and participation opportunities. While a commercial return on the investment would be desirable, of greater importance is a mechanism to ensure the NBN offers access to all Australians, regardless of ability to pay.

The Universal Service Obligation (USO) and the Digital Data Service Obligations (DDSOs) must be extended to the NBN, and access to broadband.

Every Australian should have access to a computer and the Internet and the opportunity to become computer literate. People who are already marginalised could become further isolated if the NBN is introduced and they are left behind. Training must be targeted to assist people and communities to get online who are currently on the wrong side of the digital divide.

Accessibility Principles and Equipment

The Australian Broadband Guarantee, currently limited to Australians in regional areas, should be extended to include accessible software and hardware that are essential to access for Australians with disabilities. Affordability of accessible equipment – often costlier than installing and operating computing and broadband equipment – must be a key component of universal access.

Any retail service provider that uses the NBN must provide a detailed accessibility plan for core and ancillary services.

Government must provide and update training for current information technology professionals and students to ensure that they fully grasp the importance of accessibility principles.

Rollout

The NBN should be rolled out in areas of highest need first. Reference should be made to the National Disability Strategy when determining need.

All public information related to the development, building, operation, and regulation of the NBN should be provided in accessible formats in accordance with applicable W3C Web Accessibility Guidelines. Information campaigns must be captioned in all media and provided in accessible audio formats for people with vision impairments.

Accessibility of Content

All Australian websites with Government funding must be accessible.

The public sector must lead by example and commit to fund captioning and audio description on all public sector content, and ensure that such content is accessible when distributed online.

Broadcasters should be permitted and encouraged to distribute accessible content over the Internet where providing access over existing legacy broadcast infrastructure is not feasible (for example, audio description).

All television content broadcast with captions or audio description must be equally accessible when viewed online (either for download or streaming).

Accessibility in the Workplace

Universal access to high speed broadband will transform Australian society in many ways. As part of the NBN rollout, Ai-Media recommends that Treasury model the costs of providing accessible workplaces and balance these against the avoidable costs of not

providing access. According to Access Economics, the direct financial cost of hearing loss alone was \$12 billion in 2006.¹

On the back of the NBN rollout, Ai-Media recommends a commitment to fund and deliver accessible workplaces, and educational environments, to ensure that all Australians have the opportunity to fully participate with dignity as members of society – regardless of disability or access requirements.

Ai-Media supports the concept of publicly-funded 'access vouchers' for a range of approved services carried on the NBN for people with disabilities. This would permit both employee and employer to choose flexibly from a range of access services appropriate to their individual needs without giving undue market power to any service provider.

Success on this score could be measured as follows:

1. Fewer people on disability-related benefits and more people receiving access vouchers for employment and educational services.
2. Increasing the employment rate for people with a disability.
3. Closing the gap in participation rates for those with a disability as against those without a disability.
4. Closing the gap in employment rates for those with a disability as against those without a disability.
5. Closing the gap in participation rates for those with a disability in Australia as against international best practice.
6. Closing the gap in employment rates for those with a disability in Australia as against international best practice.
7. Increase the quality of life measures for people with disabilities.
8. Increase the percentage of employers employing people with disability.
9. Increase the percentage of people with disability represented in education and training systems.
10. Increase the percentage of people with disability employed in the government sector.
11. Increase the percentage of people with disability who disclose their disability to their employer.
12. Increase the percentage of people with awareness of the specific employment needs of people with disabilities.

Broadband will be the dominant delivery medium for voice, data and video services well into the future. The challenge is to ensure this benefit accrues to all Australians.

¹ Access Economics (2006) "Listen Hear: The economic impact and cost of hearing loss in Australia".