

# WORKSHOP ON THE DRAFT CODE FOR PERSONS WITH DISABILITIES

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# CELL C TEAM

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Cell C thanks the Authority for the opportunity to present at today's Workshop on the Draft Code for Persons with Disabilities

# CONTENT OF THIS SUBMISSION

1. Draft Code on Persons with Disabilities
2. Possible issues for Discussion
3. Cell C response to ICASA Questions
4. Conclusion

# 1. Draft Code on Persons with Disabilities

## Background

- A revised draft code was published on 28 March 2014 and then on 20 November 2017, written submissions provided, and an oral hearing conducted in 2014
- The Authority has announced that a workshop to take place on 6/7 June 2019
- Cell C understands that this two-day workshop is a platform for discussions with important and interested parties to solicit further input on draft Code for Persons with Disabilities
- We believe that process will culminate into a revised draft Code for Persons with Disabilities
- Cell C recommends this be re-issued for written commentary on an expedited basis and then finalised (inclusive, meaningful, flexible, forward looking, implementable, PAC)

## 2. Possible issues for Discussion

### Suggested approach for the Authority

- Cell C has already over many years, implemented measures within its control to address the needs of persons with disabilities at its WICC, within certain stores and by training its employees
- Cell C can support regulatory interventions that are reasonable, within its control and feasible to implement
- **Cell C believes that the Authority should consider s88 of the ECA which provides for subsidies from the USF to be used where it is not technically or financially feasible for ECNS/ECS licensees to do undertake certain obligations**

*“The money in the Universal Service and Access Fund must be utilized exclusively for the payment of subsidies –*

*a) for the assistance of needy persons towards the cost of the provision to, or use by, them of broadcasting, electronic communications network services and electronic communication services.”*

## 2. Possible issues for Discussion continued..

### Suggested approach for the Authority

- Cell C also recommends that there be robust and frequent consultation with OEM's, organisations representing Persons with Disabilities, ECNS/ECS Lic., SABS, DoC and software application vendors,
  - The Authority could possibly consider a Forum to deal with issues facing persons with disabilities in their use of electronic communications, recommendations to ITU/WTSA
- The Authority could encourage take-up of android/iOS smartphones by persons with disabilities by educating these users through its website and consumer initiatives
  - These EU devices offer more software applications for use by persons with disabilities e.g. Android Apps: turn on the TalkBack screen reader, Select to Speak, Switch Access, Voice Access, BrailleBack
- The ITU has also made proposals in this regard which might be useful to the Authority

## 2. Possible issues for Discussion continued..

### Suggested approach for industry and the Authority

- *Integrate accessibility into mainstream telecommunication/ICT policies and industry codes of practice as well as through recommendations to relevant government bodies.*
- *Include accessible service delivery as part of the terms of operators' licences or introduce other measures to ensure that affordable and accessible handsets and services are provided by operators to persons with disabilities.*
- *Establish systems for assessing and benchmarking accessibility.*
- *Hold consultations with persons with disabilities and their organizations to seek inputs on regulations and business practices.*
- *Provide accessible mobile phones and services through funding from the Universal Service and Access Fund.*
- *Promote website accessibility with industry and government authorities and ensure that the regulator's own website is accessible by people with disabilities.*
- *Promote availability of assistive technologies for mobile devices at affordable rates and in local languages.*
- *Incentivize service providers to design special tariff schemes and packages to encourage mobile use among persons with disabilities.*
- *Undertake periodic surveys to gather data on mobile adoption and use by persons with disabilities.*
- *Encourage international cooperation in this area.*

### 3. Cell C response to questions

#### Steps taken by Cell C

- Cell C makes various Android and iOS devices available that are tailored to persons with disabilities, limited sales of feature phones
- Cell C Customer Care offers various services including easy access for the disabled
  - **Repair:** the booking agent will note that a customer is disabled and the job will be prioritised for repair or exchange
  - **Information:** visually impaired subscribers have access to information by contacting Cell C customer care on 084 135/135(zero-rated for on-net calls), use of USSD/online portal services
  - **Access:** vetting counters are standard seat height in majority of stores and Cell C WICC. Some stores do differ based on size and design and may have a standard counter table that could be operated from should the vetting counter be too high. All stores do have free flowing access into the store entrance. The Cell C WICC and its facilities has safe access which is suitable for people with disabilities from different entrances and caters for emergency situations



## 4. Conclusion

### Way forward

- Cell C thanks the Authority and organisations representing Persons with Disabilities for this important milestone in gathering information with the intention of finalising a revised Code for Persons with Disabilities
- Cell C recommends that there be robust engagements with OEM's, organisations representing Persons with Disabilities and SABS as they also have an important role to play ( make recommendations to ITU/WTSA)
- Cell C is committed and supports the Authority including the organisations representing Persons with Disabilities in ensuring that the revised Regulations are finalised whilst taking into account the input arising from the Workshop
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# Cell C WICC and Store

