14 AUGUST 2020

INTRODUCTION

1. Virecom (Pty) Ltd and nWise AB jointly thanks ICASA for the opportunity to make a written submission on Draft Code for Persons with Disabilities Regulations as per gazetted invitation dated 12 June and 28 July 2020 respectively.

2. We also thank ICASA for the opportunity for further participation in this consultative process. Virecom (Pty) Ltd and nWise AB have formulated the submission based broadly on the gazetted documents number 43418 and 43565 respectively.

Summary of our generic observations from the document:

a) Deafblind is forgotten in this context in both gazetted documents.
b) There is a bit of ambiguity in the usage of VRS and NRS in both documents
c) The documents appear to mix high and low, detailed and generic
d) Too detailed technical requirements
e) Lack of mentioning of applicable standards
f) Words or sentences marked in yellow is changed to existing text.

DETAILED INPUTS/COMMENTS:

A. GAZETTED DOCUMENT 43565

Annexure A

National Relay System Specifications Applicable to Video

SUGGESTED WORDING
National Relay System Specifications

1.2 Type of Service Provision

The VRS service provision must be an open eco system solution (interoperable) that enables access via:

SUGGED WORDING:
The NRS service provision must be an open eco system solution (interoperable) that enables access via:

COMMENT
1.6 should be relabeled to 1.7
1.8 should be applicable to video

1.8 Infrastructure Requirements and Recommendations

SUGGESTED WORDING
1.8 Infrastructure Requirements and Recommendations **applicable to video**

Basic characteristics
- 25-30 frames per second at CIF resolution and a max. 0.4s delay, accepting occasional blur less than that corresponding to QCIF during medium motion.
- Sound synchronism better than 100 ms.
- End-to-end delay (latency) must be below 0.4 s.

COMMENT
We would like to point out the following:

- Due to the fast evolution of technology in this field, detailed technical requirements such as these should perhaps be excluded in a policy document and introduced later in the tender process for NRS
- The requirements should be made in such a way that resolution is prioritized over latency. In our experience, and the fact that sign language is a visual language, it is more important to maintain resolution than latency if needed.

3.1. AD NATIONAL RELAY SYSTEM

The Authority requested information regarding the cost of providing the National Relay System (NRS) from I-ECS licensees, and only one licensee responded. The Authority has considered the cost implications of providing this service and it was clear that it would be feasible for licensees to provide. In terms of the recommendations received from the stakeholders, the (NRS) was included in the draft regulations and will enable persons with Disabilities to have immediate access to emergency services. The establishment and maintenance of an NRS technology platform will allow Deaf and Hard of Hearing individuals the ability to communicate.

SUGGESTED WORDING
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access to emergency services. The establishment and maintenance of an NRS technology plat-
form will allow Deaf, Deafblind, and Hard of Hearing individuals the ability to communicate.

3.3.   AD GENERAL REQUIREMENTS FOR COMMUNICATION AND INFORMATION PRO-VISION TO PERSONS WITH DISABILITIES FOR I-ECS LICENSEES

Emergency services: the functionalities that the Authority deems it necessary for I-ECS licen-
sees to provide functionalities that enable persons that are perhaps deaf or hard of hearing to
acquire emergency assistance.

SUGGESTED WORDING
Emergency services: the functionalities that the Authority deems it necessary for I-ECS licen-
sees to provide functionalities that enable persons that are perhaps deaf, deafblind, or hard of
hearing to acquire emergency assistance.

GAZETTED DOCUMENT 43418

Comments and inputs are Section-by-section:

6. NATIONAL RELAY SYSTEM ("NRS")
(1)   An Electronic Communications Service licensee must provide for a NRS which trans-
lates voice to text and vice-versa, on calls made by persons who are deaf or have a
hearing or speech impairment.

SUGGESTED WORDING
An Electronic Communications Service licensee must provide for a NRS which translates voice
to text and vice-versa, on calls made by persons who are deaf, deafblind, or have a hearing or
speech impairment.

(2) The NRS must offer the following relay services:

(a) Type and read;
(b) Speak and listen;
(c) SMS or text based services;
(d) Video; and
(e) Captioned telephony.

SUGGESTRED WORDING

(2) The NRS must offer the following relay services ==that should be compliant to relevant standards mentioned in section 1.14 below==:

(a) Type and read;
(b) Speak and listen;
(c) Text Relay based on ==Real Time Text, RTT;==
(d) Video; and
(e) Captioned telephony.

==HCO and VCO should be supported in both Video- and Text Relay Services.==

(4) The NRS specification, applicable to video, must be implemented as follows:

COMMENT: A footnote should be added that if the regulatory authority would like to have an emergency service component that works 24/7 from Year 1, it should be stated in this section

Annex A

National Relay System Specifications Applicable to Video
==**National Relay System Specifications**==

1.5 The end user must be able to access all VRS services.

SUGGESTED WORDING

1.5 The end user must be able to access all ==NRS services from all user applications defined in this document==

1.6 Emergency Calls
1.6 b)
COMMENT: The technical requirements mentioned in 1.6 b) should be applicable to all aspects of the NRS not only emergency calls. It has been defined in document 43565 and this will also cover the emergency aspects.

Accordingly, the following should be pointed out:
- Due to the fast evolution of technology in this field, detailed technical requirements such as these should perhaps be excluded in a policy document and introduced later in the tender process for NRS
- The requirements should be made in such a way that resolution is prioritized over latency. In our experience, and the fact that sign language is a visual language, it is more important to maintain resolution than latency if needed.

(For your information: We have added this wording in the relevant section in our comments for document 43565 as well)

1.14 Standards

COMMENT: It should be mentioned which standards that are relevant in this case for several reasons, for the sake of clarity and for the sake of quality of the NRS and for the sake of compliance to standards that should not be optional.

SUGGESTED WORDING
Relevant standards including but not limited to:
- SIP RFC 4103
- SIP RFC 3261

COMMENT: To achieve an adequate level of accessibility, we would suggest to also include:

the ETSI and EU Accessibility directive:
EN 301549: Accessibility requirements for ICT products and services
but we leave this one for you to decide if it is appropriate or not given this is an African matter and not an EU. It is a solid set of requirements though.

WCAG 2.1 AA or later (https://www.w3.org/WAI/standards-guidelines/wcag/)

1.16 User Applications

COMMENT: The requirements for the NRS should be that all applications should be compliant with the standards in 1.14

SUGGESTED WORDING
All User Applications should be compliant with the standards in section 1.14

3.1 AD DEFINITIONS
It is important that persons that are deaf, hard of hearing…

SUGGESTED WORDING
It is important that persons that are deaf, deafblind, hard of hearing…

This is a joint submission is Virecom (Pty) Ltd and nWise AB and supported by South African National Deaf Association.
End.