



4 May 2014

Mr. Mike Johns
Communications Alliance Ltd.
Level 9, 32 Walker Street,
North Sydney NSW 2060
Australia

Dear Mike,

**Re: Review of Information on Accessibility Features for Telephone Equipment
Industry Code ([C625:2009](#))**

On behalf of the Mobile Manufacturers Forum (MMF), I would like to submit the following comments on the above-mentioned review of C625:2009.

Proposed process improvement

From our experience of the Code, the MMF would support a change that replaces the existing G627 operational matrix for mobile handsets with a simplified process that relies solely on the feature list of GARI. While the G627 and GARI have remained aligned to date, the review cycles for both documents have made this difficult resulting in delays and duplication of effort. The MMF believes that having one list of features to be reported on for global products that are available in Australia is a more sensible approach that aligns with the nature of the products and the industry, is more efficient in operation and allows the feature list to be more quickly adapted to reflect changes in product offerings.

This approach would also be consistent with the fact that all major mobile handset suppliers already use GARI; that GARI already provides information on a substantially larger number of features than G627 - thus better serving consumers needs; that GARI maintains strong stakeholder support and continues to be based on widespread feedback and inputs; and that GARI, being based on a database, provides consumers with a better method of searching and finding devices that support the features that they want than the paper based G627 matrix system.

The MMF appreciates that one concern may be that compliance with the Code would depend on a manufacturer participating in a privately run project, even though GARI is an industry project, run by a not-for-profit trade association rather than a private corporation. To address this potential concern notwithstanding the widespread participation in GARI, the MMF would be willing to commit to providing ACIF with a PDF version of the current GARI feature list - and to update this anytime there was a change This would ensure that a

www.mmfa.org

HONG KONG
15th Floor
100 Queen's Road Central
Central, Hong Kong
Telephone +852 3180 9375
Facsimile +852 3180 9399

BELGIUM
Diamant Building 80 Boulevard A.
Reyers B-1030 Brussels
Belgium
Telephone +32 2 706 8567
Facsimile +32 2 706 8569

BRAZIL
Av. Paulista, 2300 – Piso Pilotis
CEP 01310-300 Sao Paulo/SP
Brazil
Telephone +55 11 2847 4610
Facsimile +55 11 2847 4550



supplier could comply with the provisions of the Code without a requirement to participate in GARI. Availability of the GARI feature list in this format would mean that operationally, there would be little difference between the current methods of ensuring compliance with the Code however it would have the benefit of ensuring that there is only one feature list in use by all handset suppliers.

Whether the document is meeting the needs of industry and the community satisfactorily

While it is difficult to assess the effectiveness of the G627 matrix due to its paper based form, we do know that the GARI website is attracting in excess of 10,000 unique visits per month, has a more extensive list of features and continues to receive strong stakeholder support.

GARI has also been used by Telstra in their accessibility portal¹, is made available via the Australian Mobile Telecommunications Association (AMTA) website² and is linked to by Optus³. As a result we believe that the Code is fulfilling consumer needs by ensuring that accessibility information is widely available and that GARI is acting as both a convenient means by which industry can provide this information to consumers as well as for industry to meet their obligations under the Code.

Impact of technology changes

The MMF also already commented in the last review of the G627 that the proscriptive nature of the existing matrix does restrict us from updating the wording of features in light of market and technological developments and stakeholder feedback/preferences. At the time of the last review we still had many of the features in G627 (and therefore GARI by extension) that related to 'feature phones' meaning that the feature list did not accurately reflect the current product offering in the market.

If the Code was adapted in the manner proposed then we would avoid this problem by having a more dynamic accessibility feature list that will enable changes in technology and consumer preference to be incorporated in a more timely fashion while still ensuring that all suppliers can meet their obligations under the Code.

The MMF has been very pleased with the cooperation with ACIF over the years and we thank you for the opportunity to provide input into this review. We continue to support the objectives of the Code and believe that the proposed changes that would replace the

¹ <http://www.telstra.com.au/mobile-phones/find-accessible-devices/>

² <http://www.amta.org.au/pages/gari.database?>

³ <http://www.optus.com.au/about/sustainability/responsibility/customers/disability-services/accessibility>



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operational matrix with GARI will deliver an even better consumer experience and make the provision of accessibility information easier and more accessible for all stakeholders.

If you have any questions about the issues raised above, please do not hesitate to contact me on +852 6204 6219 or via email: michael.milligan@mmfai.org

Yours sincerely,

Michael Milligan
Secretary General