

From: Ciavarra, Bert U

Sent: Monday, 4 May 2015 4:51 PM

Subject: RE: Communications Alliance - Review of the Information on Accessibility Features for Telephone Equipment Industry Code (C625:2009) - CECRP

I've had a look at the email from Mike. My comments are in red.

Cheers
Bert

- any existing issues with the Code; **no issues that I'm aware of**
- whether any process improvement is required, from operational experience in dealing with the Code; **none that I am aware of**
- any gaps in the Code; **no material gaps**
- clarifications that improve requirements; **Haven't considered. None stand out.**
- whether the document is meeting the needs of industry and the community satisfactorily; and **Not sure. What does the Regulator say?**
- expected impact of technology changes. **More accessibility features are built into standard off the shelf devices these days. Many accessibility improvements are available via download via apps, however, these are not 'native' features of devices and are difficult to capture within the Code and matrix.**

Of particular interest in this review are the proposed changes to the compliance arrangements for equipment suppliers that supply mobile handsets to meet their obligations under the Code. Currently the Code provides two compliance paths for equipment suppliers that supply mobile handsets:

- by using the mobile handset matrix in the **Operational Matrices for Reporting on Accessibility Features for Telephone Equipment Industry Guideline** ([G627:2014](#)); or
- by providing information about accessibility features that are listed on the Mobile Manufacturers Forum (MMF) [Global Accessibility Reporting Initiative \(GARI\)](#).

The proposed changes are to remove the mobile handset matrix from the G627 Guideline and for C625 to specify obligations for mobile handsets equipment suppliers to only use GARI for meeting these obligations. This approach would remove some of the continuing challenges in aligning the G627 Guideline with the features listed on the GARI website. It would also simplify the process by removing duplicate information and provide better clarity for suppliers in meeting their obligations. **Agree with this in principle.**