

Mr Bert Ciavarra
Telstra Disability Services
Public Policy & Communications
Telstra Corp. Ltd.
L39, 242 Exhibition St,
Melbourne Vic. 3000

27 February 2010

**INDEPENDENT REVIEW
TELSTRA'S FOURTH DISABILITY ACTION PLAN**

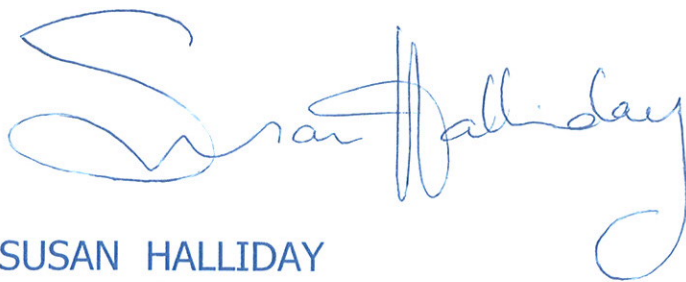
The independent review of Telstra's Fourth Disability Action Plan (DAP 4) has been completed. Conducted during February 2010, the review comprised an examination of material presented by Telstra, a review of relevant material on the internet and the physical examination of several items of equipment and their functions.

A summary of review findings is recorded. A total of 33 of 42 items are deemed to have been COMPLETE or to have presented during the review as ON-GOING WITH HIGH ACHIEVEMENT. A total of 4 items evidenced EXTENSIVE PROGRESS, and a further 5 items are rated as STILL IN PROGRESS. There are no items for which NO PROGRESS TO DATE was recorded.

In addition to the items that were mapped in the formal structure of the DAP 4 for the 2007 to 2009 period, a range of other initiatives and activities have been progressed and achieved during the given timeframe. These are worthy of acknowledgement, however they do not all fall within the original structure of the DAP 4. Hence, while they were reviewed as part of this review process, they are not all necessarily encapsulated in the DAP 4 review table that covers off the 44 key items. Some examples of the other initiatives and activities that have been progressed and achieved during the DAP 4 period are listed in the body of the review report.

It is noted that there are a range of sound reasons why additional initiatives and activities, or for that matter alternative initiatives and activities have been placed on the agenda over the last few years by Telstra, including the practical realities of altered and improved technologies, as well as the emergence of different product utilisation trends, and finally, the way in which the needs of members of the community have changed given the availability of new and improved technologies.

It is my considered view that the review has shown that the work undertaken by Telstra under the auspice of DAP 4 has been on-going, flexible, intuitive, consultative and persistent, despite the global financial crisis and significant organisational changes. This achievement, in addition to the review process results, is a credit to a number of key staff who are committed to, and well versed in, telecommunications disability matters. The development of the next Disability Action Plan will be well served by the knowledge and experience of these key staff.

A handwritten signature in blue ink that reads "Susan Halliday". The signature is written in a cursive style with a large initial 'S'.

SUSAN HALLIDAY
susanhalliday@bigpond.com
PH - 0417663396

Telstra's Fourth Disability Action Plan (DAP 4)

2007 – 2009

**INDEPENDENT REVIEW
UNDERTAKEN
FEBRUARY 2010**

SUSAN HALLIDAY

susanhalliday@bigpond.com

REVIEW RESULTS - TALLY

1. EMERGING ISSUES

ITEM	complete / ongoing with very high achievement	extensive progress	still in progress	no progress to date
1.1	*			
1.2		*		
2.1	*			
3.1 (a)			*	
3.1 (b)			*	
4.1 (a)	*			
4.1 (b)		*		
4.1 (c)		*		

2. IMPROVEMENTS TO EXISTING INITIATIVES

ITEM	complete / ongoing with very high achievement	extensive progress	still in progress	no progress to date
5.1	*			
5.2	*			
6.1(a)	*			
6.1(b)	*			
6.1(c)	*			
7.1	*			
7.2			*	
7.3	*			
7.4	*			
7.5	*			
7.6	*			
8.1	*			
8.2	*			
8.3	*			
8.4	*			
8.5	*			

2. IMPROVEMENTS TO EXISTING INITIATIVES (CONT...)

ITEM	complete / ongoing with very high achievement	extensive progress	still in progress	no progress to date
9.1	*			
9.2	*			
9.3	*			
10.1	*			
10.2	*			
10.3	*			
11.1	*			
11.2	*			
11.3			*	
12.1	*			
12.2	*			
12.3			*	
13.1	*			
13.2		*		

3. COMPLIANCE AND CONSULTATION PROGRAMS

ITEM	complete / ongoing with very high achievement	extensive progress	still in progress	no progress to date
14.1	*			
15.1	*			
15.2	*			
16.1	*			

NOTE 1 - A range of additional initiatives / activities have been progressed and achieved during the DAP 4 period. These are worthy of acknowledgement, however they do not all fall within the original structure of the DAP 4. Hence, while they were reviewed as part of this review process, they are not all included in this DAP 4 review table. Some examples of additional initiatives / activities that have been progressed and achieved during the DAP 4 period are listed in the body of the review report.

NOTE 2 – During this review process there has been acknowledgement of altered and improved technologies, as well as the emergence of different product utilisation trends and the way in which the needs of members of the community have changed given the availability of new technologies.

EMERGING ISSUES

1. Ensure Equitable Access To Text-Based Services On Their Mobile Phones For Customers Who Are Blind

EXAMPLES OF DAP 4 ACTIONS / ADDITIONAL INITIATIVES THE REVIEWER NOTED

1.1 Develop appropriate mobile phone options to provide access to text based services for blind customers

Review rating: Complete / ongoing with very high achievement

- A number of Nokia handsets currently include talking SMS, zoom as standard features.
- The Manager Disability Services had ongoing dialogue with Nokia regarding their R & D on screen reader software, and facilitated testing of a number of handsets with blind stakeholders.
- *The Nokia Accessibility Guide*, published in 2008 included Telstra input and quotes.
- The Nokia 6120 Classic and E51 include a number of voice output features as standard; the 6120 includes zoom text to 127% for customers who are blind. Also tested the 6720 Classic, which, like the E51, has the 'Talking Theme' as a selectable standby mode as a standard feature. The 6120 Classic was available for \$149 pre-paid from Telstra in late 2009.
- Overwhelmingly excellent feedback from people who are blind on the comprehensive out-of-the-box VoiceOver Screen Reader for all applications on the Apple iPhone 3GS: e.g.: "*iPhone accessibility is one of those 'quantum leap' type developments*". See also www.visionaustralia.org.au/info.aspx?page=1502. Apple iPhone 3GS launched mid-2009 has several innovative, leading edge accessibility features for people with disability. www.apple.com/au/iphone/iphone-3gs/accessibility.html.
 1. VoiceOver screen reader: Touch the screen to hear a description of the item under finger/s, then double-tap, drag or flick to control the iPhone.
 2. Zoom: Magnify the entire screen of any application up to five times normal size.
 3. Voice Control: Use your voice to make a call or listen to music.
- iPhone 3GS 16GB is available on a 24 Month Contract on a \$30 per month plan for a \$349 upfront fee/\$249 upfront on \$40 plan/\$149 on \$60 plan, \$49 on \$80 plan, and \$0 up front for higher per month plans. Capped Plans also available.
- Introduced in 2009, Orator, a screen reader software application provides customers who are blind or have visual impairment with a solution to access BlackBerry® smartphones.
- The Telstra Next G network EasyTouch Discovery 1 and 2 (T7 and T2) handsets have voice output of numbers as they are being dialled. These phones were available for \$0 upfront on a \$30 plan and \$20 plan respectively.

1.2 Work with Industry and other relevant stakeholders to explore economy of scale options for screen reading software

Review rating: Extensive progress

- Ongoing engagement with industry (AMTA) and software suppliers on options.
- International experience watching brief/learning (US/Canada/NZ).
- Included exploring extension of currently available software options: i.e. WA Lotteries Commission grant to WA Guide Dogs via ILCWA for screen reading software. Limited to WA to other states as part of Government-funded Social inclusion policy in April 2009 submission to Government Review into an Independent Disability Equipment Program.
- Briefed DEH on advising customers about software/handsets; included information about screen reading software in KnowHow.

2. Ensure Equitable Access To Fixed & Mobile Video-Calling For Customers Who Are Deaf

EXAMPLES OF DAP 4 ACTIONS / ADDITIONAL INITIATIVES THE REVIEWER NOTED

2.1 Develop appropriate fixed and mobile video communication options for customers who use AUSLAN

Review rating: Complete / ongoing with very high achievement

- Competitive offers available for fixed Broadband and Next G™/3G from Telstra and other fixed and mobile providers:
 - Standard commercial broadband plan/laptop/webcams are all that's required for fixed.
 - Most Next G™/3G phones are video capable. Telstra capped plans include video.
 - Segment Marketing investigated a call plan construct suitable for predominantly video/text users. Investigations found that Telstra phone and capped plans include ample voice, text and video options. Customers can also choose voice, text or video bonus options, depending on their phone usage.
- Awareness raising included:
 - Sunday Life August 07 advertorial: Next G™ & AUSLAN.
 - Promo on Gee Whiz, featuring AAD workshop in Darwin.
 - Regular video calling promotions in Link Magazine.

NOTED: *TDF members, including Deaf Australia & Deafness Forum, were provided a detailed briefing on video components of Telstra pricing plans at the September 2009 Forum (detailed in status of action items from previous Forum & in minutes).*

3. Ensure Access To BigPond Content Services For Customers Who Are Deaf Or Have A Hearing Impairment

EXAMPLES OF DAP 4 ACTIONS / ADDITIONAL INITIATIVES THE REVIEWER NOTED

3.1 Continue to explore avenues for the expedient captioning on

3.1.(a) BigPond Movies

Review rating: Still in progress

3.1.(b) BigPond TV

Review rating: Still in progress

Following the exploration of captioning on Big Pond movies and TV, Telstra made a number of observations and recommendations in our submission to the DBCDE *Access to Electronic Media Review*, in June 2008. Key takeouts include:

- Telstra made four recommendations in its submission:
- Meeting additional costs for captioning movies would currently represent a significant incremental per unit cost to Telstra, and make these products commercially unviable.
- www.dbcde.gov.au/media_broadcasting/television.

Access to Electronic Media for the Hearing and Vision Impaired, Discussion Report – Approaches for Consideration published November 2009.

- Chapter five comprises considerations for Internet download, including two *approaches being considered*.
- Telstra's submission supported the *approaches being considered and made two additional recommendations*.

Telstra will continue to review international and national initiatives towards enabling captioning on BP sites.

4. Ensure Provision Of Accessible Communications Products & Services On Next Generation Networks For Customers Who May Require Disability Equipment

EXAMPLES OF DAP 4 ACTIONS / ADDITIONAL INITIATIVES THE REVIEWER NOTED

4.1 Manage aspects of Telstra's transformation to ensure customers with disability who require disability equipment and accessories can successfully migrate to Telstra's Next Generation networks. E.g.:

4.1(a) Ensure interference-free access to our Next G™ network for hearing aids and cochlear implants

Review rating: Complete / ongoing with very high achievement

- Engaged National Acoustics Laboratory & worked with BHA & Deafness Forum to ensure interference free hearing aid compatibility (HAC) for Next G™ devices post CDMA. Extensive process resulting in information on BHA website with 10 models of Next G phones most suitable for people with hearing impairments.
- A hotline was established to assist customers with CDMA migration issues.
- Information on mobile phones & HAC is posted/reviewed on t.com and KnowHow.
- To support improved testing and labelling of mobiles for HAC, from March 2008, Telstra amended the Mobile Device Requirements Specifications to require Mobile Device Vendors to provide information about telecoil & microphone ratings, and neckloop compatibility.
- The Telstra Next G EasyTouch Discovery 1 & 2 handset launched November 2008 & October 2009 were the first mobiles in Australia to be specified & laboratory tested for HAC before launch. Results were EXCELLENT (M4/T4). Results of end user testing by Better Hearing Australia and Deafness Forum members with hearing aids and cochlear implants confirmed the EXCELLENT results, with all triallists saying they would recommend the phones to other people with HI.
- Telstra worked closely with AMTA, Australian Hearing/National Acoustics Laboratories and Deafness Forum to improve information available about hearing aid compatible mobile phones, resulting in a joint NAL/AMTA brochure, and a Deafness Forum brochure.

4.1(b) Continue to explore real time text communications options for TTY users

Review rating: Extensive progress

- Telstra engaged Trillium Technology to undertake a number of tests to assess the ability for TTYs to communicate over IP networks.
- With manufacturer/licensee *Danger Inc*, ensured HipTop mobile PDA product access to the IP Relay, essentially altering the way IP Relay recognised callers.
- Worked with IP Relay to ensure other PDAs/smartphones AND other 3G/Next G mobile devices with internet access can access the IP Relay, including the EasyTouch Discovery.
- Telstra is developing a view on fixed line options in a NBN/IP future.

4.1(c) Explore options to improve video quality on Telstra's Next G™ mobile handsets (e.g. compatibility with H.264 protocol)

Review rating: Extensive progress

- Active support/watch on initiatives to improve video quality.
- Telstra's networks support handsets with H.264 codec.
- Washington University is undertaking a video compression project, using H.264 codec. Telstra is keeping a watching brief on this accessibility work.

4. Ensure Provision Of Accessible Communications Products & Services On Next Generation Networks For Customers Who May Require Disability Equipment (cont...)

Additional initiatives

- A** Worked with products and TC&C marketing re the accessibility of PSTN Home Manager for customers with disability.
- B** The Telstra Next G EasyTouch Discovery handset was developed in consultation with Telstra's Disability Forum and representatives of older Australians to include as many accessible features as possible for older people and people with disability, including: big, separate buttons with large numbers; large numbers onscreen; audio feedback of numbers being dialled; loud, clear speakerphone; excellent hearing aid compatibility; clam-shell design for protection and ease of answering/disconnecting; bevelled edges for easier or one-handed opening; non-slip back, to prevent sliding when used on a flat surface; recommended for rural areas (a Telstra 'Blue Tick' phone); built-in help menu and instructional DVD. This phone was available on an entry-level mobile plan with no upfront payment.
- C** Telstra-TJA Christopher Newell Prize for Telecommunications and Disability.
Telstra has provided a \$20,000 prize for the best paper on telecommunications and disability to be published by the TJA (*Telecommunications Journal of Australia*). The Prize was announced 24 June 2009 by Hon Bill Shorten, Parliamentary Secretary for Disabilities with Telstra and ACS publishing media releases. The Prize recognises and commemorates the ground-breaking work that Christopher undertook within the telecommunications industry from 1990 to 2008 in representing the needs of people with disability. The Prize competition is administered by the Managing Editor of TJA, Dr Peter Gerrand, on behalf of the ACS-TSA (Telecommunications Society of Australia; a Special Interest Group of the Australian Computer Society) using a Judging Panel of independent experts to evaluate and rank the competition entries. The prize winner will be announced in May 2010 along with the publishing of a number of the entries received.

IMPROVEMENTS TO EXISTING INITIATIVES

5. Awareness & Understanding By Telstra Staff Of Customers With A Disability

EXAMPLES OF DAP 4 ACTIONS / ADDITIONAL INITIATIVES THE REVIEWER NOTED

5.1 Ensure disability awareness among Telstra staff by way of the on-line Disability Awareness training module, or Business Unit equivalent

Review rating: Complete / ongoing with very high achievement

- To comply with the DDA, all Managers and employees must be aware of, understand and apply relevant policies and associated processes. To that end, Telstra's online disability awareness training at Learn. Achieve continues to be mandatory for FOH employees, at commencement of employment and every two years.

5.2 Regularly review awareness training initiatives to ensure relevance

Review rating: Complete / ongoing with very high achievement

- The Online Disability Awareness Training module ALO0054 was reviewed and progressively replaced in 2009 by:
 - Mandatory Compliance Induction Training:
General Legal Obligations - What You Need to Know TLA208011B: The Trade Practices Act (TPA) & You; Telstra's Privacy Policy & Disability Awareness mandatory combined online training course: Module three: Disability Awareness: includes in a new, interactive "Your Responsibilities to our Customers" online training module, with a number of awareness-raising case studies, including for the first time about issues relating to customers with acquired brain injury (ABI), developed in consultation with Brain Injury Australia (BIA).
 - Mandatory Compliance Refresher Training:
Business Essentials - Course II - Diversity, Equity and Disability Awareness refresher course, required to be undertaken every two years
- Feedback from course participants has been used to improve the training modules.
- Regular DEH consultant briefings include mobile access, and information about accessible features of mobiles.
- Regularly updated to resource materials, including on access to mobiles and on the online employee resource *KnowHow* site.

6. Provision Of Appropriate Equipment For Customers With Disability To Ensure Reasonable Access To A Standard Telephone Service

EXAMPLES OF DAP 4 ACTIONS / ADDITIONAL INITIATIVES THE REVIEWER NOTED

6.1 Maintain a Disability Equipment Program (DEP) and specific associated activities to meet regulatory (USO) obligations, e.g.:

6.1(a) Product development, review, maintenance and support

Review rating: Complete / ongoing with very high achievement

- Telstra has ongoing dialogue on product development, review and maintenance through the Disability Equipment Program Consumer Advisory Group (DEP CAG). *The DEP CAG meets March and September. See also 15.1.*
- Following representation from Deafness Forum and Better Hearing Australia, Telstra began a field trial in August 2009 for the introduction of Tone control on the Telstra BB phone, for people with higher frequency hearing loss.
- Trillium Technology has developed a telephone adaptor for current cochlear implants. A working model is with Cochlear Ltd. After many attempts to engage with Cochlear, they agreed to investigate whether certification testing is required.
- Telstra reports annually on performance of its DEP to the Telecommunications Regulator, ACMA via the Telecommunications Act S105 Carrier Performance reports – e.g. 2007-08 and 2008-09.
- The results of the sixth and seventh annual wave of the Disability Enquiry Hotline Caller Study, to investigate the experiences of people with disability (PWD) or their Carers when using the DEH service was presented, at the September 2007 and 2008 Telstra Disability Forums.
- DEP statistics, comprising calls to the DEH, applications received & processed, numbers of items of equipment sent to customers, DEP loans program etc *are reported at each DEP CAG meeting.*

6.1(b) A DEP application process

Review rating: Complete / ongoing with very high achievement

- The application process for most DEP products significantly improved in mid-2007 to include acceptance of applications for DEP products (except TTYs & Cochlear Implant telephone adapters).

6.1(c) Marketing and Promotional Activities

Review rating: Complete / ongoing with very high achievement

- TDF members were briefed on DEP marketing & promotional activities, which included Telstra, and numerous government and independent websites, bill notice to all customers; Link magazine advertisement in all editions.
- www.telstra.com.au/disability/catalogue regularly reviewed, and was revised and replaced by www.telstra.com.au/abouttelstra/commitments/disability/products.cfm.
- Information about Telstra's DEP and DEH is accessible from the 'Home Phone' site on telstra.com.
- Telstra's [Access for Everyone](#) brochure and online site includes links to information about Telstra's DEP.
- A comprehensive list of external promotion initiatives and activities for the DEP was provided to the March and September 2009 DEPCAG.

NOTED - *Telstra's submission to the Government's Feasibility Study into an Independent Disability Equipment Program (April 2009) promotes a nationally consistent, whole-of-government, whole-of-life 'social inclusion' approach/model for the provision of telecommunications disability equipment, as part of the Government's National Disability Strategy. The DBCDE report was with the Minister late 2009. Submissions to the study were uploaded onto the DBCDE website on 24 December 2009.*

7. Provision Of Public Payphones

EXAMPLES OF DAP 4 ACTIONS / ADDITIONAL INITIATIVES THE REVIEWER NOTED

- 7.1 Continue to install TTY payphones based on need/ reasonable customer requests**
Review rating: Complete / ongoing with very high achievement
- There are around 180 Telstra TTY payphones in operation. Most have very low usage of the TTY facility. Telstra will continue to support TTY payphone users through the [mapping website](#) and will continue to assess reasonable requests for additional TTYs based on potential need, location and usage.
- 7.2 Investigate the possibility of suppressing background noise and improving incoming volume on payphones for customers with hearing impairment**
Review rating: Still in Progress
- Primary supplier of Telstra's payphones, Siemens Elasa advised its global customers across over 30 countries that it has closed its operations and Siemens is no longer supplying payphones or supporting further development. An alternate supplier exists in Spain. However, Telstra is undergoing a market assessment of potential suppliers. Further technical developments will depend on what those suppliers offer.
- 7.3 Investigate the potential for payphones to send text messages to fixed line phones**
Review rating: Complete / ongoing with very high achievement
- Telstra developed this functionality and text messages can be sent to Telstra fixed line customers. However it requires a software change to each payphone to deploy. This will be achieved via normal maintenance, as main board hardware fails and requires changing. Around 4,500 payphones are currently fitted with this new feature.
- 7.4 Investigate the potential for payphones to send emails**
Review rating: Complete / ongoing with very high achievement
- Telstra developed this payphone software functionality in 2007-8. At that time, it also required further backend network development, at additional cost. Telstra later decided that this was not a viable commercial opportunity, and did not proceed with the project.
- 7.5 Continue the program of modifying specified payphones to meet reasonable customer requests (e.g. payphone height, door width to enable wheelchair access)**
Review rating: Complete / ongoing with very high achievement
- This is an ongoing program. Telstra funded \$1 million in its payphone capital expenditure budget in 2007-08, making improvements to its legacy payphone network to assist with access and use. This was a substantial capital spend for that year. Telstra continued to meet reasonable customer requests for modifying specified payphones throughout 2008 and 2009.
- 7.6 Continue to investigate and rectify where necessary reported pedestal payphone hazards to people who are blind**
Review rating: Complete / ongoing with very high achievement
- While this action was ongoing throughout 2007-2009, the number of reported "hazards" was extremely low. Often these situations arise outside of Telstra's control when the surrounding environment around an existing payphone site is changed e.g. the pedestrian access is changed & reduced temporarily or permanently via building constructions, streetscape changes e.g. seats, trees and bins, or roadway widening.

NOTED: *The outcome of a review of the Communications Alliance Accessibility of Payphones Industry Guideline G630:2006 in 2009 re-confirmed the Guideline, without change, for a further 5 years. Telstra participated in the review, and supported this approach.*

8. Provision Of Directories & Directory Services

EXAMPLES OF DAP 4 ACTIONS / ADDITIONAL INITIATIVES THE REVIEWER NOTED

8.1 Review effectiveness of current format of TTY Directory with stakeholders

Review rating: Complete / ongoing with very high achievement

- In 2007, Sensis consulted with key organisations representing TTY users, (AAD, Deafness Forum, National Relay Service and the Australian Federation of Deaf Societies) in its review of the effectiveness of the TTY Directory. The review resulted in the discontinuation of the Directory, with support from these key stakeholders, and the introduction of listings with TTY (and Fax/Mobile) tags in White Pages directories. Sensis wrote to all listed in the TTY directory to explain their options.
- Telstra information pages in WPages directories include an expanded section on TTYs.

8.2 Maintain a Directory Assistance Helpline

Review rating: Complete / ongoing with very high achievement

- Telstra's DAH is a live, operator assisted service that includes telephone number information as well as address information for people who are unable to read, use or hold White Pages or Yellow Pages directories and are unable to satisfactorily use the standard Telstra Directory Assistance service (1223) service.
- The Directory Assistance Helpline (DAH) (12 551) has ~9,000+ registered users.

8.3 Maintain and improve where possible accessible on-line directories

Review rating: Complete / ongoing with very high achievement

- Telstra's/Sensis online directories continue to be accessible to screen readers.

8.4 Maintain the Call Connect Fee Exemption

Review rating: Complete / ongoing with very high achievement

- The Call Connect Fee Exemption is available to eligible Telstra customers who are unable, or find it extremely difficult to dial numbers on a telephone and therefore are prevented from using a normal telephone. The exemption applies only to Call Connect calls - to 12456 - made from the fixed line telephone service that has been registered for the Exemption, and it only applies to the Call Connect service fee. Customers are charged the applicable call charges for connection to the requested number.
- Call Connect Fee Exemption has ~ 1,400 registered users.

8.5 Maintain an application process to enable eligible customers to access the Directory Assistance Helpline and Call Connect Fee Exemption

Review rating: Complete / ongoing with very high achievement

- The DEH continues to manage the application process for DAH and Call Connect Fee Exemption.

9. Provision Of Appropriate Customer Service Contact Points

EXAMPLES OF DAP 4 ACTIONS / ADDITIONAL INITIATIVES THE REVIEWER NOTED

9.1 Maintain a specialist disability centre – Telstra’s Disability Enquiry Hotline – for customer queries

Review rating: Complete / ongoing with very high achievement

- The DEH continued to operate in 2007, 2008 and 2009. See Excel Spreadsheet statistics.
 - Over 42,000 calls were received in 2008-09.
 - Over 50,000 calls were received in 12 months 2007-08 year. Similar to the preceding 12 months.
 - A DEH Customer Satisfaction study report was presented at the September 2007 and 2008 Telstra Disability Forums (See report at ISSUE 6: Disability Enquiry Hotline Caller Study).
- Online resource materials and Instructions to Telstra Front of House employees – KnowHow lists the DEH as the main contact for enquiries, and instructs employees when and how to transfer customers to the DEH.

9.2 Maintain direct TTY/ text access to escalated complaints and faults; explore the potential for expanding text access further (e.g. for billing inquiries)

Review rating: Complete / ongoing with very high achievement

- No change to direct TTY contact for faults.
- Telstra’s escalated complaint group, the Telstra Customer Referral Centre, which had direct TTY access, is no longer operational (despite promotion, usage was very limited). Access to TTY complaints and other Telstra customer contact points is available via the DEH or the National Relay Service.
- Customers can also contact Telstra/make general enquiries or complaints by text via Telstra.com www.telstra.com.au/abouttelstra/commitments/telstra-complaints-policy.cfm.

9.3 Ensure callers to Telstra call centres with voice recognition have the ability to readily default to a consultant if required

Review rating: Complete / ongoing with very high achievement

- No change to ready default to a consultant for callers to Telstra call centres.
- Members requested and were briefed on the Interactive Voice Response interfaces to Telstra’s inbound call centres (IVRs) at the September 2009 Telstra Disability Forum.

10. Access To Telstra Information Provided Via The Web

EXAMPLES OF DAP 4 ACTIONS / ADDITIONAL INITIATIVES THE REVIEWER NOTED

10.1 Ensure information and content on www.telstra.com conforms with Telstra's web Accessibility Standard

Review rating: Complete / ongoing with very high achievement

- Telstra's web Accessibility Standard since 2002, published at www.telstra.com.au/standards/accessibility.html remains in force.

10.2 Review Telstra's web Accessibility Standard to ensure accessibility during Telstra's business transformation

Review rating: Complete / ongoing with very high achievement

- The standard was reviewed in 2007, and a new version of the standard published in December 2007. This included an update to t.com templates (v9), which improved accessibility. The aim of the revised standard is to reach Double-A W3C Web Content Accessibility Guidelines (WCAG 1.0) conformance and to incorporate as many Triple-A checkpoints as practicable.
- The standard was reviewed in January 2009 to include audio "Catchpas".
- Accessibility to WCAG2.0 level is being considered. Telstra will continue to consult with the Australian Human Rights Commission (AHRC) on its WCAG2.0 approach to ensure consistency.

10.3 Ensure information and content on bigpond.com is as accessible as possible

Review rating: Complete / ongoing with very high achievement

- Through Telstra's Enterprise Program Management process, Project which include information, content and customer interfaces on Telstra.com and Big Pond are required to meet Telstra's Accessibility Standard as per www.telstra.com.au/standards/accessibility.html
- Feedback from users which identifies specific content on telstra.com that is not accessible for any reason is brought to the attention of content owners to rectify.

11. Access To Telstra Shops & Properties

EXAMPLES OF DAP 4 ACTIONS / ADDITIONAL INITIATIVES THE REVIEWER NOTED

11.1 Ensure Hearing Loops are installed and maintained in all Telstra owned shops and staff instructed on how to use them

Review rating: Complete / ongoing with very high achievement

- Hearing Loops are included as a part of Telstra's standard specification for all new Telstra Shops and for "Refresh" of existing Shops.

11.2 Ensure ongoing physical access to Telstra shops and premises

Review rating: Complete / ongoing with very high achievement

- Physical access to Telstra Shops is taken into account when shop designs are created and compliance is verified by our architects and construction project manager.
- Examples include that accessibility requirements were recognised and incorporated in new T(life) stores in Sydney & Melbourne, including wheelchair access and hearing loops.

11.3 Explore options to enable video interpreting (AUSLAN) in Telstra Shop

Review rating: Still in Progress

- A number of attempts to arrange an AUSLAN session at a Telstra T[life] store in Melbourne did not come to fruition.
- The introduction of the ACE Video Relay Service trial should suit progression of this action.

12. Access to Timely Customer Information In Accessible Formats

EXAMPLES OF DAP 4 ACTIONS / ADDITIONAL INITIATIVES THE REVIEWER NOTED

12.1 Ensure Telstra bills and bill/ credit management related correspondence, contractual terms, relevant marketing offers are provided to customers in an accessible format where requested

Review rating: Complete / ongoing with very high achievement

- This activity is ongoing and included in Telstra's transformation program.

12.2 Ensure ad-hoc customer requests for information in alternative formats are reasonably met

Review rating: Complete / ongoing with very high achievement

- This is an ongoing activity, managed by the Disability Enquiry Hotline. Information in hard copy or email/links to accessible electronic copies of Telstra documentation is printed in a suitable size from t.com as required.

12.3 Explore options to promote Telstra's Disability Equipment Program in community languages

Review rating: Still in Progress

- Telephone Interpreter Service (TIS) information was included for the first time in the revised DEP brochure/application form. Further improvements being considered.

13. Ensuring Disability-Related Complaints Are Resolved In A Timely Way & Action Taken To Address Identified Root Causes

EXAMPLES OF DAP 4 ACTIONS / ADDITIONAL INITIATIVES THE REVIEWER NOTED

13.1 Ensure appropriate processes are in place to manage customer complaints relating to disability, including about potential disability discrimination

Review rating: Complete / ongoing with very high achievement

- In March 2007, (reviewed and revised in April 2009) revised Telstra's complaint management procedures to include management of complaints relating to disability/disability discrimination. The process now includes that:
 - Employees should follow the standard customer complaint process when handling complaints from customers with a disability including escalation to a Supervisor or Manager if a resolution has not been achieved
 - To comply with the DDA, all Managers and employees must be aware of, understand and apply relevant policies and associated processes. Telstra's online Disability Awareness training courses at Learn.Achieve provide information for all employees to better understand the DDA:
 - General Legal Obligations - What You Need to Know (TLA208011A) - Module Four: Disability Awareness; and
 - Business Essentials - Course II - Diversity, Equity and Disability Awareness.
 - If employees are unsure about how a DDA obligation applies or there are concerns, they are instructed to seek advice from their Manager or Telstra Disability Services.
- The Manager, Disability Services has oversight of receipt and resolution of complaints from the Australian Human Rights Commission and related state-based bodies.

13.2 Ensure appropriate processes are in place to analyse disability related complaints and arrange for remedial actions as required

Review rating: Extensive progress

- Telstra Disability Services regularly extracts and analyses data relating to disability from TIO complaints data to ensure any underlying root causes are eliminated.

COMPLIANCE AND CONSULTATION PROGRAMS

14. Ensuring Reasonable Accessibility Of Telstra's Products & Services

EXAMPLES OF DAP 4 ACTIONS / ADDITIONAL INITIATIVES THE REVIEWER NOTED

14.1 Ensure Telstra's business planning and initiative management processes continues to include disability impact assessment, issue identification and appropriate follow-up activities

Review rating: Complete / ongoing with very high achievement

- Telstra's Company Policy on Disability, which underpins Telstra's Disability programs by providing the framework within which Telstra identifies, minimises, and where possible eliminates discrimination, was reviewed in June 2008 to ensure currency.
- Telstra's Enterprise Program Management (EPM) Compliance Questionnaire (CQ) process continues to include *disability impact* assessments for all new product/service developments, business process improvements, and marketing campaigns and programs, and product/service exits.
- Marketing campaigns were included in EPM in August 2007.
 - 600+ new EPM CQ projects were assessed for DDA compliance during 2007-08
 - 700+ new EPM CQ projects were assessed during 2008-09.
 - Telstra's DDA compliance activities include Telstra's Disability Action Plan, a Compliance risk register, and Disability Services Compliance Plan.
- Telstra's DDA compliance activities are now included in Telstra's formal Compliance & Corporate Ethics Framework.
 - A Disability Services compliance report was prepared for the Board Audit Committee every six months during 2007-09.
 - Business Unit Compliance Managers were briefed in 2007 and 2009.
- These activities are managed company-wide by Telstra Consumer Affairs/Disability Services.

15. Ensuring Telstra Listens To Its Customers With Disability & Their representatives & Takes Actions To Address Issues Raised

EXAMPLES OF DAP 4 ACTIONS / ADDITIONAL INITIATIVES THE REVIEWER NOTED

15.1 Ensure ongoing appropriate external stakeholder consultation, briefings and dialogue e.g.:

Review rating: Complete / ongoing with very high achievement

- **Telstra's Disability Forum**
 - Telstra Disability Forum (two x year) held in March and September 2007-09.
- **Telstra's Disability Equipment Program Consumer Advisory Group**
 - Disability Equipment Program Consumer Advisory Group (DEP CAG) (two x year) held in March and September 2007-09.
- Telstra Consumer Consultative Council (TCCC) included disability consumer representation (three meetings held in 2007 and in 2008. Two meetings were held in 2009.
- AMTA Accessibility Committee (as required). Telstra continued in the co-chair role in 2007-09.

15.2 Maintain a regular cross-company disability/ accessibility forum to ensure Business Units are across issues, trends and business opportunities relating to customers with disability

Review rating: Complete / ongoing with very high achievement

- Refer to 16.

16. Ensuring Compliance With Telstra's Regulatory Obligations For Customers With Disability

EXAMPLES OF DAP 4 ACTIONS / ADDITIONAL INITIATIVES THE REVIEWER NOTED

16.1 Review operational processes and revise where required to ensure Telstra meets disability-related regulations and industry codes and standards, by way of Telstra's Risk Management and Compliance program

Review rating: Complete / ongoing with very high achievement

- The Manager Telstra Disability Services is an active participant in regular Telstra Compliance Forum community and Corporate Ethics and Compliance Framework (Compliance Planning) meetings. Participation in these forums ensures that Business Units are across issues, trends and business opportunities relating to customers with disability.
- In mid- 2007, Telstra Disability Services presented Telstra's 4th Disability Action Plan, and DDA Compliance plan to the C&CEF Compliance Forum, gaining Business Unit Compliance Manager buy-in to develop Business Unit –specific compliance plans and review operational processes relating to the provision of products, services and information to customers with disability where appropriate.
- Provided a DAP 4 mid-term update to Business Unit Compliance Managers in April 2009.
- Provided a six monthly Board Audit Committee report on Telstra's Disability Compliance Program through 2007-09.

END