



## **Mobile Manufacturers Forum**

Att: BEREC  
[pm@berec.europa.eu](mailto:pm@berec.europa.eu)

30 October 2015

### **Re: Comments by the Mobile Manufacturers Forum to the Public Consultation on the draft BEREC Report on equivalent access and choice for disabled end-users**

Dear Mr. Butter,

The Mobile Manufacturers Forum (MMF) submits these comments in response to BEREC's public consultation on the draft report on equivalent access and choice for disabled end-users.

By way of background, the MMF is an international association of telecommunications equipment manufacturers with an interest in mobile or wireless communications, including the manufacturers of mobile handsets and devices as well as the manufacturers of the network infrastructure. For further information about the MMF please visit [www.mmfai.org](http://www.mmfai.org).

As you may be aware, the MMF has been very active in the disability/accessibility area and established the Global Accessibility Reporting Initiative (GARI) - an online reporting tool and public database for the accessibility features available on individual mobile devices. GARI is widely used by stakeholders to help improve awareness of the range of options available within devices today and to assist in the identification of a device that will best suit an individual's particular needs. GARI is available in 16 languages and can be accessed at [www.gari.info](http://www.gari.info).

At the outset, the MMF would like to express our appreciation for including GARI in your draft report and we appreciate the work that has gone in the update of the report on equivalent access and choice for disabled end-users.

Furthermore, we would like to respond to the two questions put forward in the public consultation and would also like to support the comments made by Digital Europe in response to this consultation:

- 1. Do you have details of initiatives which you consider to be best practices in promoting equivalent access and choice for disabled end-users of electronic communication services? Please describe and explain their relevance and impact on disabled end-users.**

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The Global Accessibility Reporting Initiative (GARI) has been mentioned in BEREC's draft report as tool used already by several European regulators in order to provide information about accessible terminals to their citizens. In fact, apart from BIPT in Belgium and ANACOM in Portugal, other authorities such as ARCEP in France, ANCOM in Rumania and the Danish Business Authority have all integrated GARI into their websites or provide direct links to the database. As mentioned in the report, NKOM in Norway is currently working on a full implementation of GARI in their website. This involves downloading the XML version of the database, which the MMF makes available, so that the data can be presented in a customized manner. For a good overview of regulators and organizations actively using GARI please visit: <http://gari.info/examples-of-gari-in-use.cfm>

BEREC's survey among European NRAs found that 25 out of 27 selected the availability of accessible terminals as one of the factors that they considered the most important for equivalent access. In this sense, GARI provides a valuable contribution as it lists information on mainstream devices that are accessible to persons with disabilities, seniors and users with particular needs.

Furthermore GARI responds to the requirement to integrate the direct feedback from users with disabilities. The MMF meets on a regular basis with Organizations of Persons with Disabilities (OPwDs) to seek their input on needs and expectations in regards to mobile accessibility in general and feedback on the usability and relevance of GARI in particular.

The MMF has also committed to carry out regular reviews of the accessibility features listed in the GARI database, where all stakeholders (OPwDs, consumer organizations, regulators, accessibility experts and industry) are invited to comment on the features listed in GARI and also propose new features. The 3<sup>rd</sup> GARI feature review was carried out in the summer months of 2015. The feedback showed that most stakeholders are happy with the current feature list and comments related mostly to the usability of the public search interface.

### **2. In your opinion, what actions or measures, if any, should be considered by NRAs, governments, public bodies, consumer associations, disability associations, equipment manufacturers, network operators, electronic communications service providers and the European Commission to improve equivalence of access and choice, for example, under the provisions of the Universal Service Directive?**

The MMF supports the argument made by Digital Europe about the importance of following international standards, which help facilitate the integration of accessibility features in mainstream devices, which in turn helps to bring down costs and the expense of specialized equipment.

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Voluntary industry initiatives such as GARI not only provide a record of existing accessibility solutions but they also leave room for continued technical innovation.

Again, the MMF would like to support Digital Europe's point that

- public procurement based on international standards such as the EN 301 549 can help generate demand for accessible devices;
- referenced international standards should specify functional requirements, be cross platform, technology neutral and leave room for innovation and technological development;
- it is important to ensure that any regulation in regards to mobile accessibility be on European level as to avoid fragmentation of the market;

Another important point that is often overlooked is communication. The fact is that a majority of users who would greatly benefit from the already existing accessibility solutions in today's mobile devices are not aware of these features. With the GARI project and regular face-to-face meetings with OPwDs as well as presentations at international conference, members of the MMF try to remedy this issue, however better information on a national level about existing mobile accessibility solutions would certainly help promote awareness and bring the information to the users who need it most.

The MMF would be pleased to answer any questions that may arise from our submission.

Yours sincerely,

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