



Digital Networks Act: the perspective of persons with disabilities

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Disability rights in telecommunications



- The European Accessibility Act (EAA) and the Digital Networks Act (DNA) complement each other.
- The EAA covers consumer terminal equipment (i.e smartphones), accessible electronic communications (RTT and TC), information provision, websites and apps, support services (i.e. call centres) and emergency communications.
- The DNA covers affordability measures, specific services for persons with disabilities (i.e relay services) and equal access to emergency communications.
- **Sector specific disability-rights in the DNA are still needed!**



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EDF view on the Digital Networks Act (DNA)



- EDF welcomed the Electronic Communications Code (EECC) as an important instrument to ensure equal access to electronic communication services (ECS).
- Common barriers for persons with disabilities include higher usage costs, lack of adequate support services and inaccessibility of ECS themselves.
- The EECC gave flexibility to Member States, leading to different implementation measures (i.e relay services or emergency communications)
- Despite some minor clarifications, the DNA does not strengthen the existing rights of persons with disabilities, falling short from meeting EDF demands – **need to improve the text during the interinstitutional negotiations!**

Universal Service Provisions (Art. 87, 88 and 90)

- EDF supports the continuation of measures on availability, quality and affordability of these services.

But:

- Extend affordability measures to voice communication services at a non-fixed location (i.e mobile phone) and non-governmental organisations (i.e organisations of persons with disabilities)
- Maintain the possibility to introduce more ambitious measures at national level .

Equivalent access and choice for end-users with disabilities (Article 111)

- EDF welcomes specific measures for persons with disabilities.

But:

- Require relay services on a 24 / 7 basis in all Member States.
- Make a reference to the European Accessibility Act.

Emergency communications (Article 106)

- EDF welcomes the clarifications on equivalent access and the link with the EAA.

But:

- Apply EAA accessibility requirements to national emergency numbers as well
- Stronger requirements for the provision of Total Conversation (TC).
- Clarify the role of the mobile application for emergency communications coupled with the European Digital Identity Wallet.



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Missing children and help hotlines (article 104)



- EDF welcomes the need to ensure free of charge access to end-users with disabilities to such helplines.

But:

- Establish a link with the EAA to establish specific accessibility requirements to ensure access (RTT and TC).

European Accessibility Act (EAA)

- EDF welcomes reference to the EAA for contract information (Article 95) and transparency measures (Article 96)

But:

- Information provided by default, not only upon request (Article 95)
- Extend the application of the EAA to article 111 (Equivalent Access), Article 185 (consultation with interested parties) and Article 188 (out of court dispute resolution)

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Thank you!

daniel.casas@edf-feph.org



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