

TELEFONICA position on the BEREC consultation

“Electronic communications services: ensuring equivalence in access and choice for disabled end-users”

General Comments

Telefónica welcomes the possibility to contribute to future BEREC work in the area of “ensuring equivalence in access and choice for disabled end-users”. European telecom operators are willing to grant the highest possible level of equivalence in the provision of electronic communications services to their end customers with disabilities taking into account national circumstances, proportionality and demand.

New article 23a of Directive 2009/136/EC allows MS to enable NRAs to specify requirements to be met by companies providing electronic communications services to ensure that disabled end-users have equivalent access to and choice of services that are available to the majority of end-users. Therefore, in addition to the provisions for end-users with disabilities already in place in MS, under the universal Service Regime, Article 23a provides a mechanism to apply relevant obligations to all electronic service providers.

As a general comment we believe that this Consultation should not be a matter of asking for more regulation as there is already enough regulation for all since the Regulation of Access from 2007 came into force and includes measures for all operators, at least in Spain.

On the other hand, Telefónica believes that with regard to implementing the new provisions in the regulatory framework in this area, special attention should be paid with regard to national circumstances as well as involving operators when implementing the new provisions of the Directive. It will not always be necessary for an NRA to use their new powers and NRAs should aim to operate with a bias against regulatory intervention.

In order to determine whether it is appropriate to use these powers, we would expect that NRAs complete a thorough review of the existing services that are specifically designed for and available to disabled customers as well as alternative universally-designed services that are valued by disabled customers (for example, SMS, Instant Messaging).

Finally, we would like to point out that telecommunications operators and other companies in the industry (including equipment manufacturers and service and application providers) have long realized that disabled people are actual or potential customers. Therefore, they are already taking a number of initiatives (often in collaboration with Public Administrations and

the associations of disabled people as we will see hereafter) with the aim of meeting their needs with terminals, products and services adapted to their specific requirements, quite in the same way as they do with all other customer segments. These initiatives are proving favourable for all parties: companies in the industry are increasing their customer bases and stimulating their innovation skills, and many disabled people are obtaining services that facilitate their integration in the Information Society.

In this line of action we can mention the case of Spain where significant improvements have occurred regarding the cost of accessibility of services for disabled persons defrayed in their entirety by operators who have a maximum commitment towards these users. We believe that a sufficiently demanding regulatory framework exists that meets the expectations of these groups. Moreover, we consider that the most important problem to be overcome for the purpose of making even further progress in accessibility is the high cost of these incentives. Therefore, upon reading the BEREC consultation, it is interesting to note the initiatives that exist in other countries such as Sweden, Finland or Switzerland where through government budgets, improvements in accessibility to services are being made so that integration can be fostered.

Contributions to the questions of the consultation paper:

Question 1: Are there additional legal provisions, other than those listed in Section 2, currently in place in MS with respect to end-users with disabilities regarding electronic communications? If yes, please detail the provisions and the organisation responsible for implementing or monitoring these provisions.

Specific reference to national measures

Spain-

In Spanish law, there are provisions regarding access to electronic communications for end-users with disabilities. Specifically, we are referring firstly to the Regulation regarding the conditions for providing electronic communication services, universal service and the protection of end-users (Royal Decree 425/2005), and secondly to the Regulation that stipulates the terms and conditions of accessibility in the areas of telecommunications, the information society and social communication means (Royal Decree 1494/2007).

Specifically, in the Universal Service Regulation (Article 33) the following means/obligations are listed which the operator designated to provide Universal Service has to comply with in the area of accessibility for persons who are blind, deaf or who have a serious visual or hearing disability:

1/ Existence of an adequate offer and technologically updated special terminals, adapted to the different types of disabilities, such as text telephones, video telephones or telephones with amplifiers for persons with a hearing disability and that will provide sufficient sound broadcasting

2/ Subscribers who are blind or who have a visual disability, by request to the designated operator, will be issued invoices and advertising and information that is provided to other fixed-line telephone subscribers regarding the terms and conditions of their service provision, either in Braille or using large print.

Likewise in Article 35, two pricing plans for the aforementioned groups are listed:

1/ Pricing plan for blind end-users or persons with serious visual difficulties: Intended for blind persons or for individuals with serious visual difficulties and shall consist of applying a specific exemption for calls to the directory assistance service for subscriber numbers and in setting the terms and conditions for free receipt of invoices and advertising and information provided to other fixed-line subscribers regarding the terms and conditions of their service provision, either using Braille or large print.

2/ Pricing plan for deaf end-users or for persons with serious hearing difficulties: This will apply to those calls made from any location within the national territory whose origin or destination is a text telephone terminal and which are made via the intermediation services centre for text telephones.

As a Universal Service operator, Telefónica complies with all these measures which are therefore available in its catalogue.

Moreover, in the Regulation regarding the basic terms and conditions for access to technologies, products and services involving the Information Society and Social Communication Means by persons with a disability, the basic conditions for accessibility have been listed that affect the following areas:

- 1/ Customer service and contents of contracts and invoices.
- 2/ Mobile telephone service.
- 3/ Internet web pages for Public Administrations and other pages.
- 4/ Computer equipment and computer programmes.
- 5/ Electronic signature.
- 6/ TV content.
- 7/ Digital TV.
- 8/ Institutional advertising in audiovisual support.

The obligations listed in this Regulation exclusively affect Telefónica as Universal Service operator in a few cases referred to and for the rest forces all operators/players involved and associated with the ICT macro-sector.

The measures contained in this Regulation have a different cost/benefit analysis for operators and, in particular, for TdE in its position as Universal Service Operator. Specifically:

1/ There is an obligation to guarantee accessibility of the universal telephone directory via the Internet. Insofar as the paper edition of the directory is not discontinued, this measure represents an additional cost.

2/ There is an obligation to improve the accessibility of telephone booths for end-users who are deaf, blind or who have physical disabilities (in a wheelchair). Telefónica considers that this measure is untimely since currently public telephony on public thoroughfares is a market on the decline that is being replaced by mobile telephony. Thus significant progress has been made in recent years regarding levels of accessibility (for example with open terminals for wheelchairs, Braille keyboards and improvement in the contrast of screens for blind persons, magnetic amplifiers for people who are deaf, etc). Therefore any additional initiative for improvement that is raised will turn out to be extremely costly given the level of use of this service and the cost of developing new equipment.

Czech Republic

Disabled persons have a right to obtain a special 200 CZK (8 €) discount for fix/mobile voice service monthly fee according to the Czech Act on Electronic Communications (§ 38, subsection 3). These special discounted prices are part of USO. The loss of operators from providing discounted prices is financed directly from the state budget.

UK

Section 2 refers to Ofcom's duty to consider disabled customers on all policy decisions. However the Equalities Act 2010 imposes a general prohibition on providers of goods and services on discrimination against anyone with a disability, anyone wrongly perceived to have a disability and anyone associated with someone with a disability. In practice, this means that Communications Providers in the UK are already legally obliged to ensure equivalence is embedded in all its retail stores, products and ancillary services (e.g. websites, customer service, billing etc...) beyond that required by Ofcom.

Question 2: Do you agree that the factors listed in sections 3.1.1 and 3.1.2 are important to consider when assessing equivalent access? Are there other factors which should be considered? Are some factors more important than others?

In the Spanish case, Telefónica considers that currently operators have developed numerous initiatives designed to improve accessibility of services for those end-users with disabilities that might be unknown by these individuals due to a problem involving a lack of information via the established channels (for example, Associations, etc.). The sector is actively helping to achieve an information society that is accessible to all although the obligations imposed

on Telefónica within the framework of Universal Service guarantee the same access. Up until now, this equivalent access is being financed by operators although inasmuch as they are public interest measures, their financing should be charged to General State Budgets as such countries as Switzerland, Sweden and Finland have done, as mentioned in the consultation.

The regulation in the area of accessibility that applies to Telefónica in Spain, as operator currently designated to provide Universal Service, as well as to other operators, is of a major scope and already incorporates obligations regarding all the aspects considered in points 3.1.1 and 3.1.2. With it, a major degree of accessibility for persons with disabilities is being allowed thus facilitating their integration in the Information Society.

In Spain the current regulation, referred to in the reply to the first question, lists all the aspects identified by the BEREC such as how the availability of equipment/services, prices, etc. would be so that no additional regulation would be required in Spain. Telefónica as well as other operators present on the market are working closely together to implement improvements and innovations that promote accessibility. Likewise it is also important to highlight the close co-operation of operators with Associations and other regulatory bodies to obtain first-hand knowledge of the needs of these groups.

Finally, we would like to point out that when considering equivalence, we must be cautious about the language used and the opportunity for mis-understanding. In the consultation, BEREC refers to equivalence as meaning "equal", but then later describes this as meaning functional equivalence. It would be helpful if BEREC omitted the use of the word 'equal' (which has different implications) and instead apply consistently the term 'functional equivalence'. A consistency in phrasing will ensure greater consistency in implementation and interpretation.

Question 3: Do you agree that the factors listed above (section 3.2.1 and 3.2.2) are important to consider when assessing equivalent choice? Are there other factors which should be considered? Are some factors more important than others?

Telefónica considers that in Spain end-users with a disability already have the necessary means at their disposal for accessing commercial offers by operators, they know the terms and conditions for service provision (contracts) and also have the option of changing operators if they wish. Otherwise the treatment received by these groups would not be the same as that of other end-users.

Question 4: In your view, should the obligations currently in place under USO, for end-users with disabilities, be placed on all service providers? If no, what types of service providers, considering factors such as financial impact (cost), should the obligations be placed on? What is your view in relation to alternative mechanisms for funding?

In order to answer this question Telefónica would like to begin by remarking that the underlying main problem behind any initiative to improve accessibility is financing. Therefore, the issue to be debated is not such much who has to provide the facilities/services as who will bear the costs. In this respect, the financing of all initiatives designed to improve accessibility of services should be borne by the State whenever the competitive dynamics does not guarantee an equivalent provision of services.

In the situation where public financing is not available, Telefónica believes that the introduction of new Article 23a (1) of the 2009 Universal Service Directive (“Ensuring equivalence in access and choice for disabled end-users”) is generally speaking positive.

Regarding the new possibility granted to NRAs to specify minimum requirements to be met by companies providing electronic communications services in order to ensure that disabled end-users have equivalent access to and choice of undertakings and services that are available to the majority of other end-users, we would like to see it confined to cases which are *appropriate, taking into considerations the real needs of disabled users*.

In addition, it is essential that each NRA only considers this option where is it absolutely necessary and where it is not disproportionate to do so. In the UK, Ofcom has mandated the provision of Text Relay through all mobile devices. Whilst this may appear to reflect the intention of the new Article 23a (1) the outcome has made little impact on disabled customers, whilst imposing great expense on mobile operators.

Despite significant investment, Mobile Operators have seen negligible take up of Text Relay on mobile, preferring instead to use other mobile-specific facilities that hard-of-hearing customers find more valuable, like texting and instant messaging.

We refer to this example to demonstrate that NRAs must be cautious in mandating USO requirements on providers without appreciating that customers use different technologies and services in different ways. It should not be assumed that services that are valuable when delivered on a fixed line telephone are appropriate in the mobile environment.

It is also important not to assume that all communications providers must carry specified services in order to deliver choice. In some circumstances (like Text Relay in the UK) it may have been more proportionate in terms of costs for one mobile provider to offer the service subsidised by the others. This type of model provides NRAs and industry the opportunity to better realise the cost-benefit analysis of policy decisions.

Before answering the question related with alternative mechanisms for funding Telefónica deems it necessary to highlight the poor performance that the industry funding mechanism envisaged in Article 13 b of 2002 USD had in some Member States, with regard to financing of USO.¹

¹ Article 13 of the 2002 USD entitled “*Financing of universal service obligations*” stipulates that: “1. Where, on the basis of the net cost calculation referred to in Article 12, national regulatory authorities find that an undertaking is subject to an unfair burden, Member States shall, upon request from a designated undertaking, decide: (a) to introduce a mechanism to compensate that undertaking for the determined net costs under transparent

This outcome was generally a result of a confused compensation processes. For all these reasons Telefónica firmly believes that the current USO burden is in conflict with the goal to promote competition and creates a distortion of market dynamics.

Besides all these reasons, Telefónica is aware that, in some special cases, industry players are not yet able to come up with an affordable solution for some very specific needs. In those cases, we should not forget that integrating disabled people is mainly a social concern that is to be looked after by social welfare institutions rather than by a particular industry. Furthermore, given the great variety of needs from people with different disabilities and ways of life, it is neither feasible to further harmonize these types of special measures nor increase any obligations on the sector because the end result is usually to reduce choice instead of increasing it.

In particular Telefónica considers direct subsidies to companies through public tenders as the most appropriate funding mechanism and the most efficient means to identify suppliers of accessible terminal equipment in order to facilitate equivalent access for disabled people. Therefore, it is a measure that does not distort competition, leaving the market free to choose the most appropriate product/solution.

As a second alternative, we consider direct payment to the user as another funding mechanisms. As a matter of fact, this form of direct payment ensures freedom of choice for disabled end-users allowing them to select freely the most convenient offer/product. At the same time, it ensures, without exception, that disabled end-users are made aware of their rights and of the opportunity to benefit from special offers and services. In fact, with this method, end-users would receive the information about these measures directly from the public bodies.

Other solutions as industry funding will either be suboptimal or carry unintended consequences.

Question 5: In what form should the information provided by service providers to inform end-users with disabilities of details of products and services designed for them and information regarding pricing and contracts be provided in?

Since information is an essential aspect for ensuring that the measures adopted by the operators materialize into genuine improvements involving the level of accessibility of service, the most suitable supports should always be used. Thus for users with a hearing disability, via the Internet, in those cases involving end-users with vision problems, Braille should be used, etc.

For example and in the case of Spain within the scope of Universal Service, there is a guarantee that at least Telefónica provide subscribers who are blind or who have a visual disability, at their request, invoices and the same advertising and information that is provided to other fixed-line telephone subscribers regarding the terms and conditions for their provision of service, either in Braille or in large print.

Therefore, any subscriber who is blind or who has a visual disability may, upon request, have the same information about products, services, offers, etc. that is being provided to other users, either in Braille or in large print.

We also believe that information should be provided in a coordinated way through the Associations that represent end-users with disabilities, by using specialised publications (every year Telefónica in Spain publish information related to disabled-users through its Annual Corporate Responsibility Report.) as well as all the information services of the Associations themselves.

Question 6: Do you consider it appropriate that NRAs have a role in encouraging the availability of terminal equipment, in accordance with Article 23 (a) (ii)? If yes, what do you consider that NRAs could do to achieve this?

If public financing does not occur, the Regulation must be the least intrusive possible. It should be restricted to those cases, where necessary and taking into considerations the real needs of disabled users, ie.,proportional to the real needs of disabled

Telefónica would also like to point out that it makes no sense for an NRA to negotiate or enter into an agreement with equipment manufacturers interfering in any pre-existing relations and agreements between the latter and operators and service providers.

Question 7: In addition to the services, features and types of terminal equipment listed are there any others which you consider necessary to ensure equivalent access?

Telefónica considers that sufficient services are already being offered for specific needs. Nevertheless, technological evolution has to adapt to the solutions that are the most advanced and most suited to special communication needs.

Regarding this point, we should take into consideration the necessary feasibility of the terminals and services provided to these groups. Terminal equipment manufacturers and operators should be the ones who select the technological solution that is most appropriate for meeting the needs of these groups

Question 8: Where services, features or terminal equipment suitable for end-users with disabilities have been provided voluntarily, has there been encouragement from NRAs Government or other parties, or does it appear that the market is delivering and will continue to deliver of its own accord?

The dynamics of the market are implementing numerous products/services offers for those persons with a disability. Telefónica is voluntarily providing information about the products and services intended for these groups to their respective associations

Czech Republic

Special handset - Telefónica O2 Czech Republic voluntarily provides the special handset - model Emporia Talk Premium with attractive tariff. It is a very simple and easy-to-use mobile handset designed with senior users or people with disabilities in mind, who would find it difficult to use a standard mobile telephone. Emporia offers easy access to individual functions via lateral buttons. All keys and buttons are large and the backlit display makes it very easy to read digits and letters. The handset also has an improved sound transmission technology. Telefónica O2 markets this handset in an economical bundle with half-price credit or the O2 Neon S tariff (for seniors) at a discount. From each Emporia handset sold, Telefónica O2 donates CZK 100 as a support of Helpline for Senior Citizens.

Deaf assistance service - Telefónica O2 Czech Republic is voluntarily operating a nonstop line on which specially trained operators help and assist the deaf and the hearing-impaired people to communicate with normal people. This service could be used with text telephone, fax machine, SMS or email. The line's operators act as interpreters and provide users with assistance in an entire range of common situations. The most frequent situations include communication with state institutions and bureaus, doctors, ordering goods and services, as well as regular private messages and communication with family and friends.

The principle of the functionality of the service is very simple. An operator on the line receives instructions from a hearing-impaired customer in the form of an email, fax, or SMS and then the operator communicates directly with hearing users in line with hearing-impaired customer requests. In the same manner the operator can interpret information to other hearing-impaired customers. In this case the operator writes the content of the conversation and sends it in the selected format to the other hearing-impaired customer.

The assistant service of operator is free of charge for customers of all operators Customers pay only for sending SMS messages according to their tariff.

UK

In the past UK operators developed specially adapted handsets for deaf and hard of hearing based on the Nokia Communicator platform. The handset provided special text facilities. It was developed in cooperation with the Royal Society for the Deaf. It was a market driven initiative, in the belief that a handset made to the specification of such a

interest group would draw sufficient interest. However, only very few handsets were sold (<20).

The experience shows two things according to Telefónica: that disabled users, if at all possible, prefer normal phones because they want to communicate with everyone. Complicated solutions are often not the best. And secondly, that special interest groups, with the best intentions, do not always get it right and don't necessarily reflect the view of their constituency.

Question 9: What consideration should be given to NRAs mandating undertakings to provide services, features or terminal equipment for end-users with disabilities as part of the standard services and packages they offer?

Generally speaking we believe that NRAs should foster co-operation of all the players involved in society (equipment manufacturers, operators, associations, public administrations.). In this respect, Telefónica backs the community policy objective of creating an inclusive Information Society for all European citizens.

Particularly, Telefónica would like to submit that with the advent of smartphones many special needs can be met with specialised applications. This has seriously lowered the entry barriers for (some) specialised solutions. In the past handsets could not be modified and special features had to be developed by an operator or the handset manufacturer, often at great expense and risk. This development should be seen as very positive.

User organisations, not operators, are best placed to develop such Apps because they are each specialised in the various special needs. Operators and NRAs can help with the development, for example by putting them in touch with developers and by giving technical assistance. An example is the Autism application developed by Telefónica O2 in Ireland (see above).

The above development means that the need to mandate special terminal equipment will probably diminish and it will become disproportionate in case a software solution is available.

Question 10: What is the role for public procurement of accessible terminal equipment, as it is likely that NRAs may have no powers with respect to design or supply?

As stated above, the need for the procurement of specialised equipment may in future diminish as more special needs can be met with software solutions for smartphones.

On the other hand, the NRAs must allow the market to determine the various technological standards.

Question 11: Where a subsidy is available for services, features or terminal equipment needed for disabled end-users is the up-take as expected and are there any barriers to take-up? If yes, what are the barriers?

Telefónica backs the community policy objective of creating an inclusive Information Society for all European citizens.

State aid is fundamental for ensuring that the ICT needs of people with disabilities are met; we must consider that although the operator designated to provide universal service has obligations in this respect, the rest of the sector in itself is not going to be interested in meeting these needs. It will only assume those in which it is required to do so by the current accessibility regulation, inasmuch as the implementation of facilities for people with disabilities is never going to prove interesting for the sector due to reasons of an economic nature.

Question 12: If funding is provided to facilitate equivalent access for disabled people, is it best targeted at purchase of equipment, discounts on tariffs, by subsidising special services such as relay services or by direct payment to the user?

As stated in our answers, Telefónica supports the use of public funding to compensate undertakings for the net costs resulting from equipment provision, discounts and special tariffs.

Telefónica considers that the special products and services for people with disabilities which provide accessibility to ICT to these groups under the same terms and conditions as other end-users should be financed in their entirety by the Public Administration given their 100% social nature.

In the event this 100% public financing were not possible, the State must at least assume the additional cost involved in the provision of ICT products/services to people with disabilities above the average cost to a standard end-user.

Telefónica is advocating so that under no circumstances is 100% financing by the sector considered.

Question 13: Are there any details available on the cost per user of implementing any of the measures mentioned in the report?

Question 14: Are you in agreement that the steps, as proposed above, are appropriate for NRAs to consider when preparing to implement Article 23a? Are there any additional factors that should be considered?

ANEXO

Telefónica's commitment

Over the past five years, Telefónica has developed a plan which seeks to reduce the social divide which results from certain types of disability. The aim is to be able to satisfy the needs of this group in terms of our employees, customers, suppliers and society in general, throughout the entire Company, with regard to both internal and external processes and from a business perspective which ensures process sustainability, by integrating end-user and corporate interests.

In 2008, Telefónica's Human Resources and Corporate Reputation and Responsibility Committee launched the "Workplace Integration of Disabled People Internal Regulation" in Spain, which sought to define the direct employment of disabled people and the promotion of this policy in other companies, though the purchase of goods and services from so-called social providers. In 2009, compliance with this approach stood at 165.5%. The only way to guarantee that disabled people's needs are fully met is to directly involve them in the project. To this end, Telefónica considers it essential that the disabled participate in the processes and actions that the Company undertakes in this area, as well as, of course, validate the results and offer their experience as end users. This participation is officially ensured through collaboration agreements with the main associations that represent the disabled.

Other bodies which also form a part of this inter-related structure in order to introduce accessibility initiatives are the related public bodies and other private companies, either on an individual level or through large company associations.

Products and services

Telefónica is committed to promoting and developing products and services to improve access to ICTs for such groups, so that they might benefit from the mobility advantages that such devices and services would offer. Some examples of products that Telefónica has in its portfolio in 2009 are:

- "Teclón" landline handsets: designed for the elderly and or those with hearing or visual disabilities, reduced mobility or cognitive problems
- Mobile phones adapted via an induction loop: this is an accessory that facilitates the use of mobile phones with hearing aids and cochlear implants.
- Mobile phone adapted to using Mobile Speak: this device is a screen reader which guides the user when using a mobile phone, allowing them to identify callers before answering, send and receive messages and personalise the phone's operating modes. This product is aimed at those with visual disabilities.

- Work stations adapted for use by the disabled. These work stations consist of a computer with a number of special applications and devices, such as keyboard stickers with extra-large characters, mouse emulators, virtual keyboards etc. They have already been installed at a number of sites: the Adapted Equipment Demonstration Unit (CEAPAT-IMSERO), the Cantabria Centre for Integrated Information and Assessment, Technical Assistance and the Elimination of Barriers, or the Telecommuting and Teletraining Workshop at the Spinal Injuries Rehabilitation Foundation.
- Video call services: this is a service that allows those with hearing difficulties to make video calls, in other words, to speak and see the other person on the telephone screen at the same time.
- “Localízame”: among other uses, this service allows the families of those with cognitive problems and/or learning difficulties, the elderly and those with physical disabilities, to be locatable, as well as offer them greater independence.
- “SMS vocal”: this service allows the user to receive text messages in the same way that a voice call is received, something which is especially useful for those with visual disabilities or the elderly.
- Web Messenger: through this application, those with hearing disabilities may send text messages to landline or mobile phones through a computer connected to the Internet.
- “Find the One for You”: this guide, developed by Telefónica, helps customers to acquire accessible landline and mobile handsets, designed for the disabled or the elderly. The guide also includes usage recommendations regarding commercial models.
- Tele-interpretation platform in sign language (e-Health): In collaboration with the CNSE (Confederación Nacional de Sordos - the National Deafness Confederation), Telefónica has developed a communication platform for people with hearing disabilities in public and private services, including emergency, healthcare and education services and administrative information, etc. The service enables people in this situation to communicate through a call centre where the interpreter has a webcam with which to interact with the deaf person and audio to communicate with the person who can hear.

Finally, Telefónica in Spain, through its Telefónica Accesible and Movistar Fácil programmes, offers accessible services, easy-to-use handsets, and answers to questions relating to accessibility, disability and mobile telephone services.

Furthermore, in 2009, Telefónica developed a number of initiatives in the countries in which it operates aimed at these groups, in line with local demand and characteristics:

- The *Retadis Project (Spain)*: Fundación Telefónica launched this scheme in late 2006, within the framework of the Ministry of Industry's Advanced Plan. To date, a network with 26 centres has been set up, using technology adapted for the disabled in 17 Spanish regions, and the autonomous cities of Ceuta and Melilla. Each of these locations has two computers which have been specially adapted with numerous applications, technical aids and the software required to provide access to the Internet and connections with other computers on the network. With the experience that it has gained over the years, the Fundación Telefónica has embarked upon a new initiative known as the “Retadis Network of Centres for Individual Accessibility”, consisting of 50 personal users, who, in their homes or offices, have adapted devices

which cover their communication needs and who work alongside the Retadis Independent Centres, thus enjoying the training and technical assistance facilities that the network offers.

- Mobile transcription **(Germany)**: this is a pilot project for people with hearing disabilities developed by Telefónica O2 Germany, together with Social Affairs, an organisation that seeks to develop products and services aimed at the disabled. This service offers people with hearing difficulties, regardless of their location, a voice recognition and transcription system which provides them access to communications.
- Emporia handsets **(Ireland and the Czech Republic)**: Telefónica O2 Ireland and Telefónica O2 Czech Republic have jointly developed a handset aimed at the elderly and the disabled, at a cheaper price.
- An iPhone application for people with autism **(Ireland)**: After evaluating the usefulness of the images on Apple's iPhone for children with autism, Telefónica O2 Ireland has developed software to help autistic children to communicate using images representing everyday objects in their lives. It has been found that children who use this application have improved communication with their families and better relationships with others. The objective of this application is to create a book of images which the children's parents, teachers and tutors can add to the device and send to each other to communicate the new objects the children are using and recognising as they develop. The difference between this system and that used by parents currently (the Picture Exchange Communication System) is that the old device was difficult to transport because of its size. In addition, the iPhone enables instant sending of images between parents, teachers and tutors. The application also features images which the children can use if they are suffering an illness, etc. This enables parents to know when their children are ill or when they have hurt themselves. The application costs 29.99 euros.
- Telefónica has demonstrated its commitment to a project which it considers to be of vital social importance: a change in the perception that the corporate world and society in general has of people with disability. The Telefónica Ability Awards seek to become the driving force behind this change, with the support of the business sector. It is still a challenge today to understand the needs of people with disabilities in order to better include them within a business environment, as customers, employees and suppliers. The Telefónica Ability Awards are a pioneering and innovative initiative which each year recognise those companies or institutions that include disability within their value chain, and especially those that have placed creative solutions on the market, available to their disabled customers. To this end, the Telefónica Ability Awards not only represent an initiative that will have great impact on society in general, but which will also constitute a driving force for competitiveness among companies operating in this field.

These Awards originated in Ireland, and more specifically, at Kanchi, a non-profit making organisation that was set up to improve relations between the disabled and society at large. After the success of the first four years, Caroline Casey, the founder and president of Kanchi, set a new objective: exporting these awards to other

countries. Spain was the first place in which she sought to share her approach and she chose to do it with Telefónica, one of the main social organisations in the country.

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