



# **SUBSIDISED PHONES FOR PERSONS WITH DISABILITIES – IMPLEMENTATION PLAN**

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## List of Acronyms

CRPD	Convention on the Rights of PwDs
CTU	Caribbean Telecommunications Union
CVAS	Caribbean Video Assistance Service
ICTs	Information Communication Technology
ITU	International Telecommunication Union
KPI	Key Performance Indicator
MPAC	Ministry of Public Administration and Communications
NCPD	National Centre for Persons with Disabilities
OS	Operating System
PAVI	Persons Associated with Visual Impairment
PUC	Personal Universal Communicator
PwDs	Person with Disabilities
TATT	Telecommunications Authority of Trinidad and Tobago
TTAHI	Trinidad and Tobago Association for Hearing Impaired
UN	United Nations
USC	Universal Service Committee
USF	Universal Service Fund
VAT	Value Added Tax
WTISD	World Telecommunication Information Society Day

# 1. Introduction

## 1.1 Background

Information and Communication Technologies (ICTs) such as mobile phones, televisions, computers and the Internet pervade almost every aspect of modern living. Groups without access to these technologies are largely excluded socially and economically.

The United Nations *Convention on the Rights of Persons with Disabilities* (CRPD) emphasises the importance of ICTs in enabling persons with disabilities (PwDS) to enjoy basic human rights. Signatories to the convention are obliged to ensure that PwDs can access ICTs on a basis equal to others. Article 9 (1) states:

*To enable persons with disabilities to live independently and participate fully in all aspects of life, States Parties shall take appropriate measures to ensure to persons with disabilities access, on an equal basis with others, to the physical environment, to transportation, to information and communications, including information and communications technologies and systems, and to other facilities and services open or provided to the public, both in urban and in rural areas* (UN 2008).

The CRPD recognises that the challenges which PwDs face in participating fully in society are not necessarily because of their impairments, but are due to barriers which exist in society which impede their participation. In this regard, the CRPD describes a disability as “an evolving concept” and that:

*disability results from the interaction between persons with impairments and the attitudinal and environmental barriers that hinder full and effective participation in society on an equal basis with others* (UN 2008).

In the case of ICT devices, lack of assistive features is a barrier which impedes PwDs from full participation in the digital world. Article 4 (g) of the Convention requires member states to:

*Undertake or promote research and development of, and to promote the availability and use of new technologies, including information and communications technologies, mobility aids, devices and assistive technologies, suitable for persons with disabilities, giving priority to technologies at an affordable cost* (UN 2008).

The International Telecommunication Union (ITU), a specialized agency within the United Nations (UN) for ICTs, has a pivotal role in universal service policy and planning. In 2008, the ITU adopted as its theme “**Connecting Persons with Disabilities: ICT Opportunities for All**”, to commemorate World Telecommunication Information Society Day (WTISD). This theme centres on role that ICTs play in the economic participation and social wellbeing of PwDs.

The ITU (2015) has articulated strategic goals targeting PwDs. Member states have been asked to:

1. *Consider developing, within their national legal frameworks, guidelines or other mechanisms to enhance the accessibility, compatibility and usability of telecommunication/ICT services, products and terminals, and to offer support to regional initiatives related to this issue;*
2. *Consider introducing appropriate telecommunication/ICT services and to encourage the development of applications for telecommunication devices and products in order to enable persons with disabilities and persons with specific needs to utilise these services on an equal basis with others, and to promote international cooperation in this regard;*
3. *Participate actively in accessibility-related activities/studies in ITUR, ITU-T and ITU-D, including participating actively in the work of the study groups concerned, and to encourage and promote representation by persons with disabilities so as to ensure that their experiences, views and opinions are taken into account;*
4. *Take into account considering c) ii)<sup>1</sup> and d)<sup>2</sup> above, and the benefits of cost affordability for equipment and services for persons with disabilities, including universal design;*
5. *Encourage the international community to make voluntary contributions to the special trust fund set up by ITU to support activities relating to the implementation of this resolution;” (ITU 2015).*

In accordance with Section 18 (1) (g) of the Telecommunications Act, Chap 47:31 (hereafter “the Act”), the Telecommunications Authority of Trinidad and Tobago (hereafter “the Authority”) is obliged to comply with this Convention, in accordance with Section 18 (1) (g) of the Act.

The Act states that:

*Subject to the provision of this Act, the Authority may exercise such functions and powers as are imposed on it by this Act and in particular- ensure compliance with the Convention. As the state agency responsible for the telecommunications and broadcasting sectors in Trinidad and Tobago, the Authority has an obligation under section 28 of the Act, to promote universal service in Trinidad and Tobago. In so doing, the Authority has so far:*

- Identified basic telecommunications services to which universal service shall apply;
- Identified communities and population groups that fall within the access gap; and

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<sup>1</sup> c) ii) refers to article 9 (2) (h) of the CRPD *“To promote the design, development, production and distribution of accessible information and communications technologies and systems at an early stage, so that these technologies and systems become accessible at minimum cost”;* (UN 2008)

<sup>2</sup> d) refers to *“the importance of cooperation between governments, the private sector and relevant organisations to provide possibilities for low-cost access”* (ITU 2011)

- Earmarked a number of universal service initiatives for implementation (TATT 2012).

Schedule 3 of the Telecommunications (Universal Service) (Amendment) Regulations, 2019, mandates the provision of approved assistive technologies to PwDs. Specifically, this initiative focuses on the provision of subsidised mobile devices with assistive features. The focus on mobile devices is informed by consultative sessions held with various organisations<sup>3</sup> responsible for PwDs and feedback generated from the Authority's 14<sup>th</sup> ICT Forum<sup>4</sup>. In these sessions, the need for communication devices, which facilitate connectivity on the go, was identified as one of the major needs of PwDs in Trinidad and Tobago.

## **1.2 Purpose of the Implementation Plan**

This Plan provides a detailed roadmap for the successful implementation of the Authority's universal service initiative for PwDs.

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<sup>3</sup> Persons Associated with Visual Impairment (PAVI), (National Centre for Persons with Disabilities (NCPD), and the Trinidad and Tobago Association for Hearing Impaired (TTAHI)

<sup>4</sup> 14<sup>th</sup> ICT Forum – Telecommunications and Broadcasting Taking us into the Future, Girls in ICT Day 2015 – The Authority took the opportunity to invite females from different organisations for PwDs and schools to be a part of the Girls in ICT Day

## 2. Project Definition

### 2.1 Project Goal

This project<sup>5</sup> supports the Universal Service Framework for Telecommunications Services for Trinidad and Tobago which seeks to promote digital inclusion in Trinidad and Tobago.

The goal of this project is the provision of subsidised mobile devices to the visually-impaired and hearing-impaired.

### 2.2 Project Objectives

The objectives of this project are:

- To ensure that PwDs have access to basic telecommunications mobile services;
- To make ICTs more affordable to PwDs;
- To reduce the digital divide by promoting digital inclusion of PwDs;
- To enhance the quality of life by enabling those with disabilities to participate more fully in society— at school, work and in civic life; and
- To enable independent living for persons with disabilities.

### 2.3 Project Scope

This project aims to provide mobile devices with assistive features for the visually-impaired and hearing-impaired at a subsidised cost. The Authority proposes to subsidise up to TTD540 or 90% of the first TTD600, of the cost of the device.

An initial part of this project involved a needs assessment which informs the overall scope of the project. These activities included:

- Stakeholder identification and engagement;
- Analysis and identification of suitable assistive technology features;
- Determination of qualifying PwDs; and
- Preliminary budget analysis.

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<sup>5</sup> Project refers to the Authority's universal service initiative to provide assistive technologies to PwDs



## 2.4 Constraints and Assumptions

The successful implementation of this project will depend on the Authority gaining the full cooperation of relevant stakeholders<sup>6</sup>. The following are some assumptions, upon which the success of this project depends:

- Full support is provided by the Authority’s line Ministry—the Ministry of Public Administration and Communications (MPAC) and the Ministry responsible for PwDs—the Ministry Social Development and Family Services; and
- Support from relevant stakeholders including other government agencies, PwD organisations and telecommunications service providers.

## 2.5 Critical Success Factors

The successful implementation of this project is dependent on the factors listed in Table 1.

Objectives	Critical success factors	KPIs
To make ICTs more affordable to PwDs	Subsidise mobile devices with assistive features	Reduced cost of mobile devices with assistive features to PwDs
To reduce the digital divide by promoting digital inclusion of PwDs	<ul style="list-style-type: none"> <li>• Subsidise mobile devices with assistive features</li> <li>• Train PwDs in the use of assistive features</li> </ul>	Increased uptake of mobile devices by persons with disabilities
To enhance the quality of life by enabling those with physical disabilities to participate more fully in society—at school, at work and in civic life	Train PwDs in the use of assistive features	PwDs report an improved quality of life
To promote independent living of PwDs	Train PwDs in the use of assistive features	PwDs report improved self-sufficiency

**Table 1: Critical success factors for achieving project objectives**

<sup>6</sup> See table 2 of section 3 below for a list of the relevant stakeholders along with their roles and responsibilities

### 3. Strategy for Implementation

The strategy for the provision of assistive devices to PwDs takes into consideration:

- Key stakeholders;
- The implementation approach to be adopted for roll out; and
- The funding mechanism through which this project will be financed.

#### 3.1 Key Stakeholders

The Authority has identified a number of organisations which would contribute to the effective implementation of this project. These include organisations which directly represent PwDs and other stakeholders, such as the Ministry of Social Development and Family Services, MPAC and the telecommunications service providers.

Table 2 lists key stakeholders and their roles, along with some of their expected responsibilities.

Stakeholder	Role	Responsibilities
Telecommunications Authority of Trinidad and Tobago	Project lead and Project sponsor	<ul style="list-style-type: none"> <li>• Develop implementation plan</li> <li>• Engage stakeholders</li> <li>• Develop marketing and communications strategy</li> <li>• Manage project in accordance with Universal Service Framework and Regulations</li> <li>• Authorise PwD applications in conjunction with the Ministry of Social Development and Family Services</li> <li>• Issue PwD authorisation letters</li> <li>• Fund project through the USF</li> <li>• Maintain and update database of participating PwDs</li> </ul>
Ministry of Public Administration and Communications	Project support and Project approval	<ul style="list-style-type: none"> <li>• Provide regulatory support</li> <li>• Approve project</li> </ul>
Ministry of Social Development and Family Services	Project support	<ul style="list-style-type: none"> <li>• Provide technical and administrative support</li> <li>• Provide sign language training</li> </ul>

Stakeholder	Role	Responsibilities
		<ul style="list-style-type: none"> <li>• Assist in the authorisation process of PwD applications</li> <li>• Inform and disseminate project information</li> </ul>
PwD Organisations e.g. P.A.V.I, N.C.P.D. and TTAHI	Project support	<ul style="list-style-type: none"> <li>• Inform and disseminate project information</li> <li>• Provide training</li> </ul>
Concessionaires who provide telecommunications services	Project support	<ul style="list-style-type: none"> <li>• Provide technical and administrative support: <ul style="list-style-type: none"> <li>○ Source equipment</li> <li>○ Distribute equipment</li> <li>○ Basic training on built in assistive features</li> </ul> </li> <li>• Submit quarterly reports to the Authority</li> </ul>

**Table 2: Stakeholders’ roles and responsibilities**

### 3.2 Project Implementation

#### 3.2.1 Implementation Approach

This project will be rolled out using a phased approach. Phases are as follows:

- i. **Pilot Phase** - provision of mobile handsets to approximately 100 persons who are visually-impaired and/or hearing-impaired spanning 10 PwD organisations. The pilot phase is expected to run from February 2020 to May 2020. During the pilot phase, the Authority will closely monitor all aspects of the project to identify and rectify any possible glitches and shortcomings in the project’s processes and procedures. The pilot phase will also be used to solicit feedback from all relevant stakeholders with a view to improving the project’s processes and systems prior to full roll-out.
- ii. **Full implementation** - provision of mobile handsets to 100% of hearing-impaired and visually-impaired population in Trinidad and Tobago. Full roll-out of the project is expected to start in July 2020 and expected to continue for a period of two years.

### 3.2.2 Equipment Sourcing and Distribution

To facilitate easy procurement, telecommunications service providers are responsible for sourcing the approved mobile devices with assistive features<sup>7</sup>. Operators are best poised to supply these devices, as they have the business capacity and established supplier networks. It is anticipated that the estimated number of devices required are as follows:

- Visually-impaired (5,600 mobile devices)
- Hearing-impaired (1,400 mobile devices)<sup>8</sup>

The identified service providers would effect the sale and distribution of the mobile handsets, in accordance with procedures and guidelines established by the Authority. These service providers are:

- Digicel Trinidad and Tobago Limited (Digicel)
- Telecommunications Services of Trinidad and Tobago Limited (TSTT)

It is proposed that the sale and distribution of the devices be conducted at specified retail outlets located in Trinidad and Tobago. To ensure easy access for PwDs to receive assistive devices from telecommunications service providers, it is recommended that at least one retail outlet must be located in the north, south, west, east and central parts of Trinidad and one in Tobago.

### 3.2.3 Recommended Assistive Features for Mobile Devices

Current research recommends the following assistive features for persons with impairments:

#### **For the hearing-impaired:**

- Messaging options
- Vibrating alert
- Adjustable volume control
- Internet capability for video conferencing
- Relay services

#### **For the visually-impaired:**

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<sup>7</sup> The majority of smartphone devices in the market are equipped with assistive features which facilitate communication by the hearing-impaired and visually-impaired

<sup>8</sup> The number of mobile devices for visually and hearing impaired was averaged based on the possible number of persons who are visually and hearing impaired in Trinidad and Tobago. The information was given to the Authority by the Ministry of Social Development and Family Services.

- Screen readers
- Adjustable brightness
- Adjustable font size
- Text to speech

### 3.2.4 Eligibility Criteria

The following eligibility criteria would be adopted by the Authority to identify suitable recipients of devices with assistive technologies. All components of the criteria must be met for an individual to qualify for a subsidised mobile device:

1. The applicant must be a resident of the Republic of Trinidad and Tobago.
2. The applicant must be 18 years and over.
3. The applicant must be visually-impaired and/or hearing-impaired and in receipt of a disability grant.
4. The applicant must provide the Authority with evidence of the disability such as a medical report or doctor's certificate identifying and confirming the disability.

### 3.2.5 Guidelines for Participation

PwDs wishing to benefit from this initiative must:

1. Meet the eligibility criteria established above to benefit from the subsidy.
2. Contribute 10% of the first TTD600 of the cost of the assistive device.
3. Cover any differences in excess of TTD600.
4. Enter into an agreement with the Authority and the respective service provider.

### 3.2.6 Procedure for PwDs to Receive an Assistive Device

In order to promote transparency, accountability, simplicity and minimise potential risks associated with the initiative, the following steps have been devised for PwDs to receive assistive devices:

1. The PwD must call the Authority's offices and schedule an appointment;
2. On the date of the appointment, the PwD will be required to submit a completed application form which will be made available on the Authority's website. The application form will contain the following:
  - Name of applicant
  - Date of application

- Date of birth of applicant
  - Address of applicant
  - Contact number of applicant
  - Email address of applicant
  - Identification number (passport, permit or national identification number) of applicant
  - PwD File Number
  - Social Welfare Office Registered Location
  - Type of disability
  - Method of payment for disability grant (cheque or direct deposit)
  - Preferred mobile provider
  - Signature of applicant or finger-print proof (where applicable)
  - Terms and conditions
3. The PwD will also be required to submit the following documents to the Authority:
    - Copy of national photo identification
    - Copy of most recent disability grant (if paid via cheque)
    - Copy of evidence of visual or hearing disability (medical report or doctor's certificate)
  4. The Authority will validate the eligibility of the applicant by verifying their information through the Ministry of Social Development's disability database.
  5. The Authority, upon its satisfaction that all the criteria have been met, will approve the application and issue an authorisation letter to the applicant. The authorisation letter will be stamped and signed by an official of the Authority. A copy of the authorisation letter will be kept by the Authority for its records.
  6. For PwDs who receive their disability grants via direct deposit, the authorisation process may take up to one week as validity checks will have to be conducted in conjunction with the Ministry of Social Development and Family Services. Upon receiving confirmation by the Ministry of Social Development and Family Services, the applicant will be informed of the outcome and whether his application was accepted or rejected. Successful applicants will be informed of a date to receive their authorisation letters.
  7. The Authority will establish, maintain and update a database of successful applicants for its monitoring purposes.
  8. The applicant will submit the original authorisation letter to his preferred service provider at an authorised location and proceed to choose an assistive device.
  9. The applicant will be required to pay the retailer any outstanding amounts (10% of the first TTD600 or any amounts in excess of the approved threshold).
  10. The telecommunications service provider will submit to the Authority, the documents listed in section 3.3.3 on a monthly basis, to initiate reimbursement through the USF.

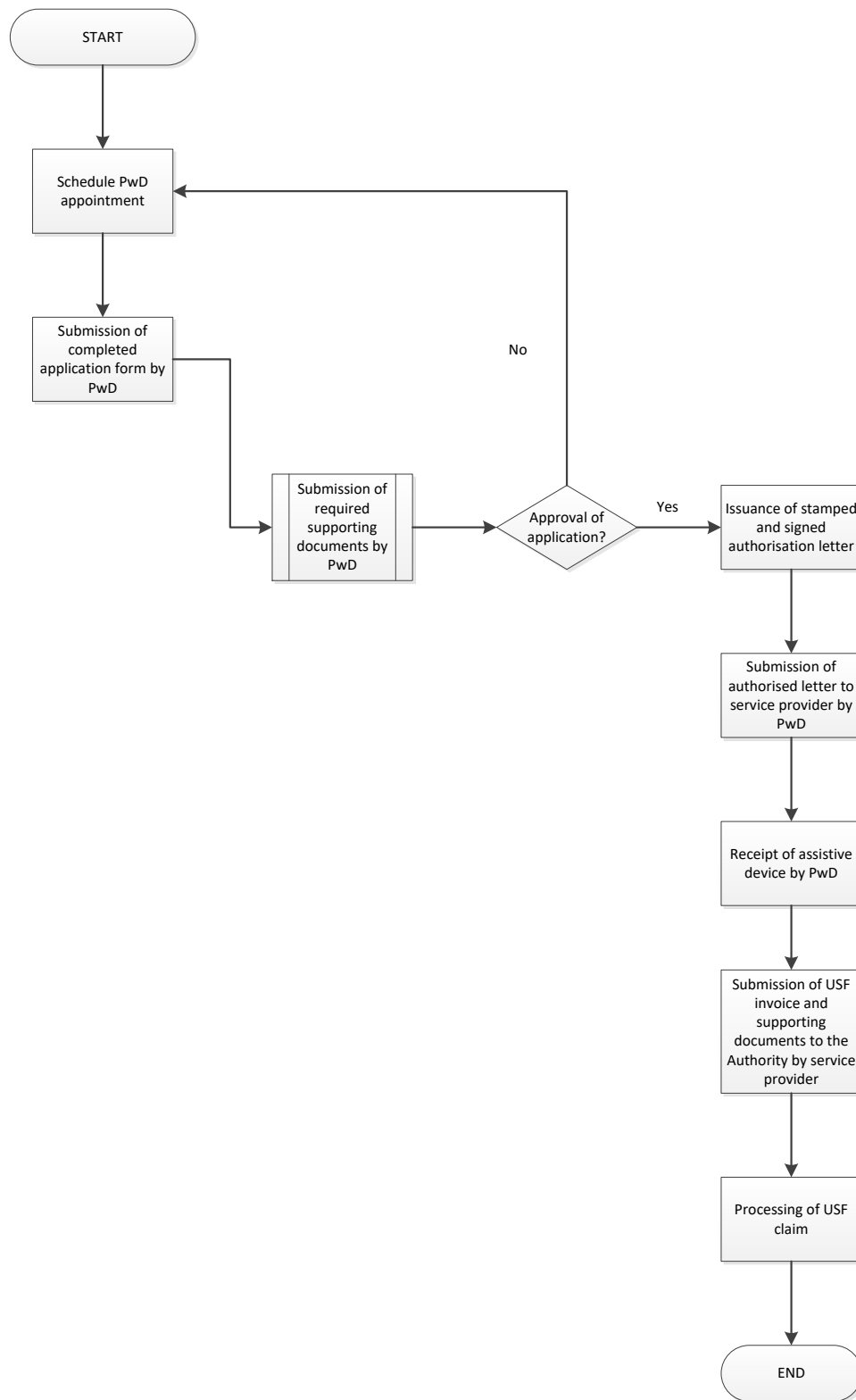


Diagram 1: Summarised process for the receipt of an assistive device by a PwD - Cheque

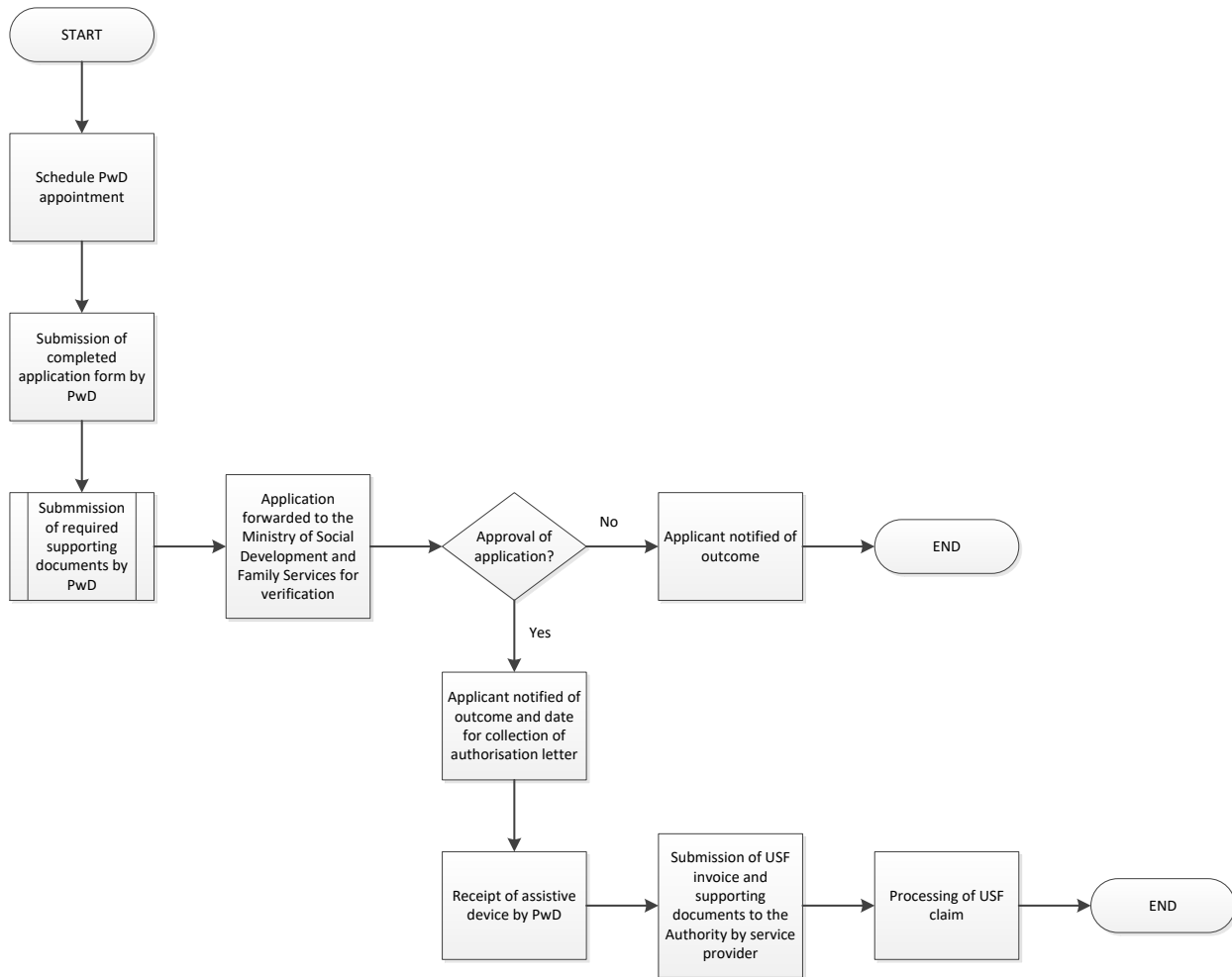


Diagram 2: Summarised process for the receipt of an assistive device by a PwD - Direct deposit

### 3.2.7 Training

The Ministry of Social Development and Family Services has also offered its assistance to train up to 12 frontline staff of the service providers and the Authority in sign language at no cost. These training sessions will enable frontline staff:

- To communicate more effectively with PwDs;
- To improve the level of service provided to PwDs;
- To enable the independence and privacy of PwDs; and
- To assist the participant in the training sessions to understand and appreciate the cultural and linguistic barriers PwDs generally face when seeking to access care and support.



The Authority, in section 3.2.2, has identified that retail outlets be located in six locations throughout Trinidad and Tobago.

As such, it is suggested that 12 frontline staff representing the two telecommunications service providers identified, attend these training sessions. The training sessions will be held twice weekly for a period of nine weeks.

In addition, it is also recommended that at least two customer service representatives from the Authority attend these training sessions, as it will better enable them to more effectively communicate and interact with the PwDs in the application and authorisation process of the project.

### **3.2.8 Monitoring and Evaluation**

The following are some of the proposed activities for monitoring and evaluating this project:

- Independent surveys to be conducted to measure the impact of the project from both qualitative and quantitative perspectives;
- Feedback forums to be conducted with project participants to determine if the project is meeting the outlined objectives;
- Service providers will be required to supply the Authority with quarterly reports.

## **3.3 Funding**

### **3.3.1 Quantum of Subsidy**

The quantum of the 90% subsidy was informed by the following:

- The availability of funds in the Universal Service Fund (USF);
- The financial constraints generally faced by PwDs;
- The high cost of assistive devices in the local market; and
- The need to assign a duty of care and responsibility on the recipient.

### 3.3.2 USF Funding Mechanism

This project is a mandatory universal service initiative which qualifies for funding through the USF<sup>9</sup>. Participating concessionaires in this project shall be reimbursed through the USF for costs incurred. Funds will be disbursed in accordance with procedures to be established by the Authority.

### 3.3.3 Procedures for Reimbursement

To be reimbursed, concessionaires will be required to submit on, a monthly basis, the Universal Service Fund Claim Form and Associated Documents. This information must be submitted 15 days from the end of the relevant month. The documents required to be submitted are:

- A completed Universal Service Fund Claim Form<sup>10</sup> and associated attachments including, *inter alia*:
  - an original monthly invoice from the concessionaire detailing:
    - the names of the participating PwDs;
    - the cost of issued assistive devices net of VAT;
    - the invoice VAT on assistive devices;
    - the makes and models of assistive devices; and
    - the dates of purchases.
  - signed certified copies of invoices billed to PwDs;
  - original authorisation letters issued to service providers by PwDs;
  - copies of national photo identification of PwDs; and
  - any other relevant documentation.

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<sup>9</sup> Funding of this initiative is prescribed in Schedule 3 of the Telecommunications (Universal Service) (Amendment) Regulations, 2019

<sup>10</sup> See Appendix 1

## 4. Budget

To determine the financial viability and sustainability of this project, a draft budget was developed. This budget is intended to assist in:

- Determining the overall cost of the devices based on an expected number of qualifying PwDs;
- Managing costs and keeping within budget;
- Determining outflows of cash from the USF on a year to year basis; and
- Ascertaining the sustainability of the project.

### 4.1 Budget for Subsidised Mobile Devices

In deriving the costs associated with the potential number of devices required, three main factors were considered:

1. The number of persons who are hearing-impaired;
2. The number of persons who are visually-impaired; and
3. The estimated average cost per mobile device with assistive features.

As indicated in Section 3 of this plan, recipients of the assistive device must be in receipt of the disability grant. In light of this, the budget was prepared using an average of the number of persons with visual and/or hearing impairment as indicated by the Ministry of Social Development and Family Services. The average numbers are provided in Table 3.

TYPE OF IMPAIRMENT	NUMBER OF PwDs REGISTERED
SEEING	5,600
HEARING	1,400
<b>TOTAL</b>	<b>7,000</b>

Table 3: Average Number of PwDs registered with Ministry of Social Development and Family Services

After conducting substantial research in the domestic market, it was established that the most affordable devices with assistive features offered by service providers ranged from TTD400 to TTD800. As such, an average cost of TTD600 (VAT inclusive) per device was used to develop the draft budget.

#### 4.1.1 Budget Assumptions for Mobile Devices

The draft budget was developed based on the following assumptions:

- All qualifying PwDs will apply for and receive a mobile device with assistive features;
- There will be 100% uptake when the project is fully implemented;
- The cost of the mobile devices with assistive features remains unchanged over the two-year period;
- The number of qualifying PwDs remains unchanged over the two-year period; and
- The data provided by the Ministry of Social Development and Family Services is reliable.

Table 4 presents the estimated subsidised costs of mobile assistive devices per year.

	Unit cost per device (TTD)	Subsidised cost per device (TTD)	Total quantity of devices required	Total estimated subsidised cost of devices
Visually-impaired	600	540	5,600	3,024,000
Hearing-impaired	600	540	1,400	756,000
<b>Total subsidised costs (TTD)</b>				<b>3,780,000</b>

Table 4: Total estimated subsidised costs of assistive devices

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**5. Appendix 1: Universal Service Claim Form**



**TELECOMMUNICATIONS AUTHORITY OF TRINIDAD AND TOBAGO (TATT)**

**UNIVERSAL SERVICE FUND (USF) CLAIM FORM**

**Project Information**

- 1) Name of Concessionaire .....
- 2) Project Name .....
- 3) Project Number .....
- 6) Project Phase .....
- 9) Total Claim Amount \$.....

10) Details of Claim:

.....

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.....

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Name: .....

Signature: .....

Designation: .....

Date: .....

For official use only			
	Name in Block Letters	Signature	Date
Claim certified by			
Claim checked by			
Payment approved by			

Please attach Claim Form to your original invoice for the amount claimed together with all relevant documentation to support the claim