

Strategic Review of Telecommunications - Phase II

An OFCOM Consultation

Response by RNIB (Royal National Institute of the Blind)

Summary of Recommendations

Whatever decisions are made about the overall structure of the telecommunications industry, universal service should feature at the heart of any strategy. It should be viewed as a positive contribution to society and to the health of the industry.

The concept of universal service should be built into new services and new generations of network from the outset.

It should be extended to the ways in which disabled people gain full access to broadcasting.

It should be used to ensure the availability of accessible and affordable terminal equipment.

Customers should be assisted in interpreting pricing information and in switching supplier.

1. Introduction

1.1 RNIB welcomes the opportunity to respond to Phase II of the above consultation. However, it is not at all clear to us that the comments we made during Phase I have been taken into account. The consultation is concerned primarily with the structure of the industry and the future role of BT. We would have liked to have seen a greater emphasis on the needs of disadvantaged customers. In view of this, we are appending the main part of our response to Phase I, as we feel its content still merits consideration. In addition, we have made below some further comments arising from Phase II.

1.2 In Particular, we have pointed out that certain aspects of broadcasting must come within any strategic review of telecommunications.

1.3 We are the major voluntary agency working with and on behalf of blind and partially sighted people in the UK, offering a wide range of direct and indirect services. We have always taken a close interest in telecommunications, from the early days of training blind telephonists and assessing switchboards to our current involvement in product design and development. In recent years we have, for example, worked with Vodafone on bringing to market mobile telephones with speech output. We have responded to a wide range of OFTEL and OFCOM consultations on telecoms issues. Members of RNIB staff have served on a range of advisory committees and working groups set up by the regulator.

1.4 According to Government figures based on household surveys, some two million people have difficulty reading standard print or recognising a friend across the street. Those same people generally have difficulty reading visual displays or coping with small keypads. The great majority are elderly, while many live alone. It follows that the telephone is of particular importance if isolation and exclusion are to be minimised. The telephone is a key source of information as well as being a potential lifeline.

2. The case for universal service

2.1 A great deal of the Phase II consultation document focuses on the future structure of the UK telecommunications industry. While these matters are important, they should not distract us from paying due attention to the needs of disabled customers.

2.2 Annex K of the Consultation Document suggests that the rationale for universal service obligations relating to disabled people is “a well-targeted re-distribution to individuals with specific disabilities.” this seems a very incomplete definition. Universal service, as it relates to disabled people, aims to reduce the handicaps which equipment, networks and services might otherwise present to users with disabilities. It is a socially just concept, removing barriers and promoting equitable access. The spin off will be increasing usage of networks, but the motivation should be societal. OFCOM has a duty to promote the interests of all consumers, including quite explicitly in the Communications act 2003 disabled consumers.

3. Importance of Universal Service.

3.1 We must not be mesmerised by the growing diversity of information and entertainment services delivered by telecoms. The telephone at its basic level remains literally a lifeline - for 999 calls, through community alarm services, and as a link to counselling, information and friendship. In today's society it is almost as essential as energy supplies, and as such must still be viewed as a utility liable to regulation.

4. Broadcasting - Enlarging the Scope of the Strategic Review.

4.1 The consultation document (in particular Annex J) looks at the convergence of communications networks, but concludes that it is premature to review or regulate universal service in telecommunications and public service broadcasting together.

4.2 The document focuses on market control issues. However, the concept of "public service" broadcasting also encompasses those facilities which make radio and television accessible on a more equitable basis to disabled people. This includes sub-titling and signing in the case of hearing impaired people. For people with sight loss, it includes audio description and non-visual access to interactive features and electronic programme guides.

4.3 Access services such as audio description should not be lost or dropped when broadcasts are delivered via non-traditional platforms (e.g. television broadcasts on mobile phones). OFCOM should also encourage manufacturers of equipment to build in the necessary functionality to enable users to receive these access services.

4.4 The Internet also needs to be regulated in this respect, to ensure that tv programmes broadcast across the Internet can retain audio description and offer accessible programme guides and interactive services..

5. Looking to the Future.

5.1 It is essential in this forward-looking strategy that the opportunity is taken to ensure that access requirements for disabled people are from the outset built into next generation networks and into new departures such as voice-over broadband. Relay services, directory enquiry and emergency services must be

protected as technology moves on. Visual, tactile and audio input and output must remain core functions of any developments.

6. Funding

6.1 However universal service is funded, its customers will benefit if it is presented to suppliers as something attractive, to be bid for, and not a burden.

7. Terminal Equipment

[see also Section 3 of Appendix]

7.1 OFCOM should once more look seriously at ways in which universal service can be used to ensure the availability of accessible and affordable terminal equipment. Without terminal equipment, the best of networks is of no value. No review of train services would be complete without considering railway stations, and equally no review of telecommunications networks makes sense if it overlooks terminal equipment.

7.2 The market has already failed in relation to terminal equipment for deafblind people wishing to use text relay. It could equally fail in mass market situations. For example, the convention that the figure 5 on a keypad should be marked with a raised dot is fast disappearing. Where dots are still used they are often so small as to be of little use. The inability to orient yourself on a keypad which has function keys in addition to number keys can bar you from the network.

7.3 In this instance, the best strategy may be the obligatory acceptance of robust design standards. In other instances, it might be appropriate to influence public procurement policies or comply with future non-discrimination duties. Whatever the detail, however, any telecoms strategy must take account of the essential role of terminal equipment.

8. Choosing Prices, Making Comparisons and Switching Supplier

[See also Section 4 of Appendix]

8.1 Customers certainly need assistance in understanding the plethora of tariff packages, especially in the mobile market. As wholesale line rental rolls out the same will be true of fixed line services. Indirect access options and bundling telecom and cable broadcasting charges together complicate choice still further. We believe OFCOM should either provide wide ranging, personalised

advice or encourage and validate independent companies offering such services. Suppliers should be encouraged to advertise clearly, and there may well be a role for the Advertising Standards Agency.

8.2 The price charged for switching supplier should definitely be capped by the regulator. Otherwise companies could simply charge a sum that cancelled out any potential savings from switching. This would be a form of telecom slavery. Switching should be simple and involve as little bureaucracy as possible. However, OFCOM should maintain firm controls on doorstep selling.

9. Conclusion

9.1 Universal service should feature at the heart of any strategy for the telecommunications industry. It should be viewed as a positive contribution to society and to the health of the industry.

9.2 The concept should be built into new services and new generations of network from the outset.

9.3 It should be extended to the ways in which disabled people gain full access to broadcasting.

9.4 It should be used to ensure the availability of accessible and affordable terminal equipment.

9.5 Customers should be assisted in interpreting pricing information and in switching supplier.

10. Further Information.

For clarification, discussion or further information, please contact in the first instance David Mann, Campaigns Officer, RNIB, 40 Linenhall Street, Belfast BT2 8BA, tel. 028 9032 9373, e-mail david.mann@rnib.org.uk

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Appendix

Extracts from RNIB submission to Phase I consultation, June 2004.

2. General Principles

2.1 We feel it is very important that the “technological revolution” does not leave behind those people who are not best equipped to run with it. While of course there are numerous blind and partially sighted people who, in their employment, studies or daily life will relish and benefit from the latest communications opportunities, there are also many who will be baffled and apprehensive in the face of change. It is important that simple, straightforward telephone calls remain readily available, and that they can be made without the need for sight and without the need for hi-tech intervention or expensive equipment.

3. Terminal Equipment

3.1 It is not possible to consider telecommunications without considering terminal equipment. We are well aware of the regulatory divide between networks and services on the one hand and terminal equipment on the other. However, OFCOM does have a duty to promote inclusive design and to encourage collaboration between service providers and manufacturers. No strategy would be complete without an equipment strand, just as no telephone call can be completed without a useable and affordable telephone.

3.2 The miniaturisation of equipment, while obviously advantageous to many, can exclude those with difficulty in seeing or in manual dexterity. Any reliance on visual displays is excluding, as for that matter total reliance on sound would be for those with hearing loss. A range of easy to use equipment must continue to be available, alongside handsets with fifty function buttons.

4. Independent Advice to Consumers

4.1 Competition brings lower prices, but it can be a chimera. If the consumer is bombarded with too much information, presented in inconsistent ways, s/he will end up confused, not helped. There is

a continuing need for reliable, independent advice on what might be the best deal for a certain person in a certain set of circumstances.

APPENDIX ENDS