

## Response to Ofcom consultation on Review of the Universal Service Obligation

This response is to Question 15, which relates to Section 6 of the Review—Services for customers with disabilities. As someone who is Hard of Hearing and a hearing aid wearer my response is restricted to services for customers who have a hearing impairment.

Question 15 at the end of the subsection, comprising paragraphs 6.24 to 6.27, headed 'Payphone accessibility' asks 'Do you agree that option 2 (i.e. maintain existing obligations) offers the best opportunity for improving the accessibility of public call boxes (PCBs)?'

My response is that I do not agree that option 2 offers the best opportunity. New accessibility requirements need to be imposed. These new requirements should come out consultations with the providers.

The reasons for my response are as follows.

1. Present requirements for the benefit of the hearing impaired, that at least 70% of all PCBs must incorporate additional receiving amplification, do not satisfy the requirements of the Disability Discrimination Act DDA).

To ensure that the same service is being provided to the hearing impaired as is available to the general public then at least three changes need to be made.

- a) The requirements should apply to all public payphones, not only to PCBs.

- b) The requirement should be 100% of all payphones.

- c) 'Amplification' should be explicitly identified by the technologies currently commonly available, namely amplification of the received signal and by providing an inductive loop in the handset, since inductive loops are now almost universally provided in hearing aids.

2. Consultations with the providers are essential for the identification of an agreed set of requirements ensuring compliance with the DDA. As is stated in paragraph 6.4, 'Ofcom believes that it is still appropriate to continue to have specific obligation' rather than just rely on the DDA.

Consultations are also needed to avoid in future the totally unsatisfactory situation whereby hearing-impaired people were excluded from the mobile phone revolution because analogue mobile phones are unusable with hearing aids.

Consultations must of course lead to regulations that encompass future technological developments. Ofcom should recognise that many technological solutions would require changes to hearing aids. The inclusion of 'Bluetooth' capability in hearing aids if a wireless solution is adopted, for example.

Dr Eric Morris

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A hearing aid user responding in a private capacity.