

Review of the Universal Service Obligation

An OFCOM Consultation

Response by RNIB (Royal National Institute of the blind)

1. Summary

1.1 Text Relay. We support the establishment of a Stakeholder Advisory Panel, reporting publicly and accessibly. We also support research into internet access for text relay.

1.2 Payphones. Regulations concerning payphones should be tightened to include improved functionality for blind and partially sighted people and extended to cover of all payphones in public or semi-public places.

1.3 Accessible Formats. Regulations should be extended to include requirement for timely delivery.

1.4 OFCOM should give higher priority to bringing forward policies relating to the accessibility and affordability of terminal equipment.

2. Introduction

2.1 RNIB is pleased to have this opportunity to respond to OFCOM's consultation on universal service. Our comments should be seen in conjunction with those we submitted to Phase II of OFCOM's Strategic Review of Telecommunications. These can be found on OFCOM's web site at

http://www.ofcom.org.uk/consult/condocs/telecoms_p2/restsrp2/rnib.pdf

or in Word or Text format from RNIB (see below for contact details).

2.2 Those comments highlighted the continuing value of universal service and the need to take a broad view in the light of convergence. Telecoms cannot be viewed in isolation.

2.3 RNIB is the UK's major voluntary agency serving blind and partially sighted people. Our mission is to challenge blindness and to eliminate barriers to full participation in society by people with

sight loss. To this end we offer a wide range of direct and indirect services. A core theme of our work is to promote independence through accessible information.

2.4 We are in constant touch with blind and partially sighted individuals through channels such as our Management Board, our membership scheme our Help line and our service delivery. We also work closely with organisations serving deafblind people. We believe this puts us in an authoritative position when seeking to influence government and regulators.

2.5 We have always taken a close interest in telecommunications, from the early days of training telephonists and assessing switchboards to current projects aimed at setting standards and developing products. We have commented on many of OFTEL's and OFCOM's consultations and have interacted with the regulator through various working groups on which members of our staff have served. We responded to the consultations on universal service run by the Department of Trade and Industry and by OFTEL in the Spring and Summer of 2003. We are actively engaged with the Government and other parties in campaigning to ensure that people with sight loss are not excluded from digital television and radio. We have led campaigns on behalf of the European Blind Union seeking to influence developments at European as well as UK level.

3. General

3.1 We continue to support the achievement of as many aspects of universal service as possible through General Conditions, applicable to all service providers. We find Paras. 2.4 and 2.5 of the Consultation Document misleading, in that they seem to imply that most services targeted at disabled people are required only of BT and Kingston.

4. Text Relay Service (Consultation Questions 12 and 13)

4.1 We support the establishment of a Stakeholder Advisory Panel. This should include adequate, accountable representation of deafblind people and their particular needs. In supporting this proposal, we do not wish to undermine the valuable work that the Telecoms Advisory Group (TAG) has been and is carrying out.

4.2 The Panel should be open in its working, and report regularly and publicly. Given the communications challenges faced by those interested in its work, it should report through a wide variety of channels. It must take particular care to ensure that its website is fully accessible and that it can promptly deliver braille versions of its reports, papers, or minutes, alongside large print and other accessible formats.

4.3 It is currently very difficult for deafblind users to obtain adequate and affordable terminal equipment for text relay. For this reason, if for no other, we support the suggestion that OFCOM should put resources into researching and developing internet access to text relay.

5. Funding of Universal Service (Consultation Questions 1 and 2).

5.1 We support the idea of making universal service obligations attractive and worth vying for, rather than burdensome. We have no particular view on how universal service should be funded, but re-iterate our belief that it should be applied to terminal equipment where the market has failed, e.g. in terminal equipment for deafblind people.

6. Disability Discrimination Act 1995 (DDA) - Paras. 6.3 and 6.4).

6.1 We agree that reliance on DDA is not enough, especially as the Act requires an individual to initiate action.

7. Payphones (Consultation Question 15) (Para. 6.25 et seq)

7.1 The status quo is inadequate. We must re-iterate our view that the current regulations relating to payphones fall short of what is required in two respects.

a) they do not apply to “managed payphones” in places such as railway stations or shopping malls; and

b) they contain no accessibility requirements in respect of vision impaired users, such as easily navigable keypads, information displayed in large print or access to audible information on the location or the telephone number of the payphone in question.

7.2 The requirements for payphones should accordingly be tightened to improve their functionality, from the perspective of blind and partially sighted people, in all public or semi-public locations.

8. Accessible Formats (Consultation Question 16) (Para. 6.28)

8.1 We have no objection to OFCOM's proposals to extend eligibility.

We do feel that a requirement should be added for prompt delivery of accessible formats. There are currently instances where, for example, a customer receives his bill in an accessible format only after the due date for payment or for deduction of direct debit.

9. Consultation (Consultation Question G1)

9.1 We would only observe here that consultation is ultimately only of any value if the views obtained are acted upon.

10. Publicising Services (Paras. G26-28)

10.1 We support further mystery shopping exercises, and other means of encouraging providers to publicise and be proud of their services for people with disabilities.

11. Terminal Equipment (Paras.G29 and G30)

11.1 To say that proposals will be published "in due course" is to say nothing at all.

11.2 Without accessible and affordable equipment, the best networks and services are out of reach and so of no value. We maintain our view that, where the market has failed, it is legitimate to achieve universal service through initiatives relating to the provision of terminal equipment.

11.3 We look forward to OFCOM's proposals with interest, and trust they will appear soon..

12. Further Information

12.1 For further information or clarification,, please contact in the first instance David Mann, RNIB Campaigns Officer, tel. 028 9032 9373, david.mann@rnib.org.uk

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