

Review of the Universal Service Obligation

OFCOM Statement and Further Consultation, published June 2005.

Response by RNIB.

1. Introduction.

1.1 RNIB responded extensively to the consultation on universal service published by OFCOM in January 2005, as well as to the universal service elements in Phase II of the Strategic Review of Telecommunications earlier this year. The present comments do not seek to re-iterate all the points made then, but simply to respond to specific aspects of OFCOM's latest Statement on universal service.

1.2 Nor do we seek here to re-state our credentials in this area, trusting that we are already acknowledged as an organisation with a breadth of expertise and consumer contact.

2. Disconnections

2.1 We welcome the added protection against disconnection which OFCOM proposes for disabled customers who have nominated a third party for bill management purposes, and those on priority fault repair schemes.

3. Typetalk

3.1 We welcome the decision to set up a Stakeholder Advisory Panel for text relay services. We would urge OFCOM to ensure that the interests of deafblind people are adequately represented on the Panel. RNIB would endeavour to nominate an appropriate person if invited to do so, but would equally be happy with representation nominated by bodies such as SENSE or Deafblind UK.

3.2 The Panel's Annual Plans and Reports and other proceedings should be as accessible to people with reading related disabilities as to others, with an accessibly designed web site and publications available in a range of formats.

4. *Public Call Boxes*

4.1 We are disappointed that OFCOM has no immediate proposals to specify access requirements relating to people with visual impairments. The proposed one-day conference could be very positive, but only if both providers and regulator take note of its outcome.

4.2 OFCOM has not presented evidence to justify its decision not to extend access requirements to manage payphones.

5. *Accessible formats*

5.1 While we are of course pleased to see eligibility for bills and other material in accessible formats extended, we are disappointed that there will still be no specific requirements for items in these formats to reach the customer within a reasonable period. This is all the more surprising given the expressions of concern in responses to the earlier consultation, which this Statement notes.

6. *Terminal Equipment*

6.1 We remain convinced that universal service will not be available to all disabled people unless provision is made to ensure the availability and affordability of accessible terminal equipment where the market has failed. We reject the argument that terminal equipment falls outside universal service because it is the subject of a separate European directive, viz the Radio and Telecommunications Terminal Equipment (RTTE) Directive.. That directive seeks to maintain a single internal market by ensuring that any "essential requirements" imposed on manufacturers are done so on a Community-wide basis. It does not seek to influence what equipment might be offered on a rental basis, nor what social subsidy might be offered to customers with particular access requirements.

6.2 We welcome OFCOM's undertaking in Section 6.5 of the Statement to become more active in exercising its duties under Section 10 of the Communications Act 2003 and to promote the development and production of accessible equipment.

7. Further Information

7.1 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.

DM/RNIB 27th September, 2005