



**OFCOM CONSULTATION ON REGULATION OF VoIP SERVICES. 22 FEB. 2006.  
HEARING CONCERN RESPONSE**

***Preamble***

Hearing Concern is a membership organisation with the aim of enabling hard of hearing people to participate fully in society. It is estimated that there are, of the order of, 9 million hard of hearing people in the UK with, in addition, an extensive network of families, friends and work/education colleagues. Hard of hearing people include those in the early stages of losing their hearing, hearing aid users and text users. It covers all age groups although many will be older.

In the context of telecommunications, most of these people communicate using speech and residual hearing, although, for the more severely affected people, other forms of support will be required. Equivalent access to telecommunications at equivalent cost is vital for hard of hearing people.

The Telecommunications Working Group of Hearing Concern deals with access to telecommunications for hard of hearing people and we welcome the opportunity to respond to the consultation. Our comments relate primarily to Section 6: Consumer Protection – consultation on draft code.

***General comment***

In general, we agree to the proposed approaches – as indicated in the responses below. However, we still have concerns in regard to the use of VoIP in emergency situations. We believe that it is quite possible that the flexibility of VoIP to include text and video will result in developments and significant take-up by hard of hearing people who will use services that offer functional equivalence to voice telephony for hearing people. If this proves to be the case and hard of hearing users move over significantly to VoIP from traditional PATS services then access to emergency services becomes vital.

Ofcom and the VoIP representatives have clearly taken the issue of disabled users and emergency calls seriously and we appreciate this. However, this does not mean that we are completely happy with the current solutions. We would urge Ofcom to encourage the educational aspect and to move steadily towards all VoIP providers offering access to emergency services.

***Specific responses***

*Question 7: Do you agree with the proposed application of the code?*

Yes

*Question 8: Do you agree with the proposed approach for informing consumers that services may cease to function if the broadband connection fails or there is a power cut or failure?*

Yes

*Question 9: Do you agree with the proposed approach for informing customers where access to emergency calls is not available?*

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Yes

*Question 10: Do you agree with the proposed approach for informing consumers that access to emergency calls may cease to function if the Data Network fails or there is a power cut/ failure?*

Yes

*Question 11: Should the code be extended to point of signature acknowledgement in respect of reliability of access to emergency calls?*

This sounds rather officious. To what use will the signature be put? Is it to protect the service provider?

*Question 12: Do you agree with the proposed approach to location information providers where the service does provide access to emergency calls? In particular, do you believe that subscribers should be required to register their main location prior to activation of the service?*

Clearly, location is of importance to the emergency services. Normally, we should prefer “advised” to “required”. However, we recognise that the purchaser may not be the user needing emergency services and the latter should be protected. Therefore, our response to the question is Yes.

*Question 13: Do you agree with the proposed approach to informing consumers where services do not provide emergency location information?*

Yes

*Question 14: Do you agree with the proposed approach to informing customers where services do not provide number portability?*

Yes

*Question 15: Do you agree with the proposed approach to informing consumers about the types of facilities that might not be available, but which they have come to expect from a telephone service?*

Yes