

Title:

Mr

Forename:

John

Surname:

Paton

Representing:

Organisation

Organisation (if applicable):

Sense

Sense is the leading national charity that supports and campaigns for children and adults who are deafblind. We provide expert advice and information as well as specialist services to deafblind people, their families, carers and the professionals who work with them. In addition, we support people who have sensory impairments with additional disabilities.

Access to the phone system is essential for both social and economic participation and Sense is committed to ensuring that deafblind people get access that is equivalent to everyone else.

Question 1: Do you agree with our proposed approach to definitions?:

Question 2: Do you agree with our proposal to add CEPT to the list of standardisation bodies?:

Question 3: Do you agree with our proposals to extend the requirements of GC3 beyond ?fixed locations? and to require CPs to ?take all necessary measures? to maintain their networks and services and access to emergency services?:

Question 4: Do you agree with our proposals for emergency call numbers - which includes amending the definition of CP and requiring that location information is provided free of charge, as soon as the call reaches the emergency organisations and is accurate and reliable (in line with our proposed high level criteria)?:

Question 5: Do you agree with our proposed approach to contract related requirements relating to the provision of additional information, the length of contracts and the conditions for termination?:

Question 6: Do you agree with our proposals to ensure equivalent access to the emergency services for disabled users and to mandate the provision of Emergency SMS?:

Sense welcomes the decision from Ofcom to mandate the Emergency SMS service. This service has been shown to save lives and is a good step towards equivalent access to emergency services for people that can not use a voicephone.

It is important to note that this is only a 'step towards' equivalence. SMS is not a conversational medium and is the textual equivalent of trying to contact the emergency services by leaving a message on their answerphone. Until Braille terminals to access the telephony network are made more affordable there will be no real equivalence for some deafblind users.

Sense hopes that Ofcom's relay services review, scheduled for later this year, will work towards equivalence by introducing IP access to text relay. This will make the prospect of mobile Braille textphone access a real possibility and will give deafblind Braille users far better access to lifesaving emergency services.

Question 7: Do you agree that given the existing measures that are in place to help disabled users to access 116XXX services, it is not necessary to make further changes to GC15 in this respect?:

Services such as Childline and the Samaritans that can be accessed through dialling 116XXX are often sought when somebody is experiencing issues with trust. Because of this it is essential that people feel comfortable with the method they use to connect to these services and both text relay and direct textphone access may put off some people from contacting these services if they feel vulnerable.

Organisations like Missing People, Childline and the Samaritans all advertise textphone numbers in order to be able to provide people with a direct service without needing to go through a third party. Some people can be distrustful of advertised textphone numbers however, due to organisations not answering textphones. Other people may feel there are confidentiality issues with a third party in the call. Because of this, Sense feel that Ofcom should look for a way to offer choice of access method to textphone users.

One possibility could be that Ofcom should seek advice on whether 180015 116XXX can be routed directly to the organisation's textphones as a special case allowing 18001 116XXX to connect via text relay as normal. Alternatively, if IP access to text relay is mandated later this year this may provide a mechanism for giving the user choice of text relay or direct textphone access.

Question 8: Do you agree with our proposals on conditions for transferring the rights of use of telephone numbers and also for granting their use for a limited period of time?:

Question 9: Do you agree with our proposals on the one working day requirement in relation to bulk mobile ports and in relation to fixed porting? If not, please explain why?:

Question 10: Do you agree with our proposed approach to the porting compensation scheme requirement?:

Question 11: Do you agree with our proposed approach on requirements relating to ensuring access to all numbers within the Community, the charging of ETNS numbers and calling the hotline for missing children on 116000?:

Question 12: Do you agree with the proposed obligation on universal service providers to notify us when they are disposing of part or all their local access network assets?: