

**Title:**

**Forename:**

**Surname:**

**Representing:**

Self

**Organisation (if applicable):**

**Email:**

**What do you want Ofcom to keep confidential?:**

Keep organisation confidential

**If you want part of your response kept confidential, which parts?:**

**Ofcom may publish a response summary:**

Yes

**I confirm that I have read the declaration:**

Yes

**Ofcom should only publish this response after the consultation has ended:**

Yes

**Additional comments:**

I think we need a standalone telephone system that will address the technological lag that deaf people suffer from.

Text Relay is an outdated model that forces deaf people to rely on telephone lines which I feel to be anti-competitive and restricts choice for deaf people.

We need a BT line usually to make the Text Relay service work which in effect creates a monopoly for BT whether desired or not.

Why does the above state that the latest date to respond is 20th July? which should be an impossibility as the consultation period is from 28th July to 20th October.

**Question 1: Do you agree that NGTR would provide greater equivalence than the existing approved TR service? Do you agree that we have considered an appropriate range of improvements:**

Only if it allows it to be accessed through the internet, This would mean that it would become standalone and able to be accessed through mobile devices.

For this to happen the way deaf people are charged for phone calls would have to be overhauled and separate from landline phone bills.

Too many broadband companies mischarge deaf people for typetalk use. For example Talk Talk thought 18001 was a premium number like 118 001! This leads to confusion and problems with communication, Most broadband companies resolve the problem but some dont as you are dealing with people reading from a script in india with massive cultural differences never mind basic deaf awareness.

The key change would be more control over charging for phone calls

It simply has to be more transparent and standalone to enable calls to be made through computers, tablets and mobile devices and apps to empower deaf people.

**Question 2: Do you agree with the proposal to implement NGTR through the amendment to GC15? Do you agree that the criteria we propose satisfactorily embody improvements we suggest for NGTR:**

Only if this proposal GC15 also applies to the major mobile telecom companies such as orange, three, 02 & T-Mobile.

These companies should be forced to provide access for deaf people through text based means like typetalk or video.

How else can we use up our voice minutes? We never use them yet have to pay monthly for a service that we never access.

This has to be addressed through NGTR to GC15

**Question 3: Do you agree that a period of up to 18 months for implementation of NGTR, following an Ofcom statement, is appropriate:**

Yes to allow for bug fixes & troubleshooting,

But more importantly I want to see an awareness campaign of NGTR through the media such as internet, TV and Billboards.

For it to be successful arguably the general public has to be aware of it and use it to improve communication access with the deaf.

The lack of publicity following the launch of Text Relay has been its achilles heel because too many people confuse it with mobile "texting".

**Question 4: Do you consider that the requirement to ensure equivalent services for disabled end-users would require a mandated VR service in some form for BSL users? Please indicate the basis of your response:**

I agree for some disabled users a mandated VR service in BSL is essential BUT i hope you dont lose sight of the access through text means.

Access through text should be less technically difficult to develop than VR in BSL.

There should be a choice button to use text or BSL. As some deaf people may want to chat in BSL informally and use text when in formal/serious mode

**Question 5: Do you agree that a restricted service would be more proportionate in providing equivalence for BSL users than an unrestricted service:**

If by restricted service you mean a choice between text or BSL then yes it would be more proportionate than providing equivalence for BSL users.

There are 9 million people with hearing impairments in UK and only 250k maximum use BSL so some perspective is needed,

**Question 6: Please provide your views on Methods 1 ? 5 for a restricted VR service discussed above. Are there any other methods that are not mentioned that we should consider? In making your response, please provide any information on implementation costs for these solutions which you believe is relevant.:**

I believe a combined service with choice of BSL or Text Relay is essential to consider.

I would have thought text relay access through the internet would be technically easier to develop. Deaf people are relying on an outdated model of text relay that prolongs the use of obsolete technology like minicomms & forced reliance on BT lines.

To be a success the solution has to be portable , standalone and accessed through devices such as mobile phones , pc , laptops & tablets via internet,

Most new mobile phones have a good video camera for signing VR to be enabled and text based input.

It would be an appropriate use of deaf peoples funds to buy the latest mobile phones which are cheaper than some of new minicomms!

Minicom price range £200-261  
which is excessive

But understandable if spent on latest mobile technology

Some HTC phones are competitively priced at under £200

You can buy a iPhone 3GS 8GB Black for £299 which to me represents better value than the top spec minicom.

even if you couldnt afford it this could be broken down into monthly payments,

More deaf people would go on these monthly payments if they had accessible services provided on it and a way to use those voice minutes.

For a revolution in deaf telecommunications a solution has to be found in the mobile market. I would say the technology is there to develop this in the 21st century,

**Question 7: Do you agree that a monthly allocation of minutes combined with a weekday/business hours service would be the most appropriate means to restricting the service:**

Yes I agree but this consultation should also look at voice minutes on mobile phones and how deaf people expend this credit appropriately.