

## **OfCOM Consultation – Review of Relay Services**

### **Response from Significan't (UK) Ltd (SignVideo and Smart Captions)**

#### **Introduction**

SignVideo (video relay services) and Smart Captions (captioned relay services) are two of the services provided by Significan't (UK) Ltd and its partners throughout the EU. In the UK we have three core partners who provide their customers with SignVideo (online video sign language interpreting services) based in London, Edinburgh and Oxford with others providing their customers with access to our services. SignVideo has been in continuous action since 2004 and is the largest video relay service in the UK and Smart Captions has completed a successful 3 months trial with a select group of over 50 deaf and hard of hearing people with speech earlier this year.

Significan't (UK) Ltd is pleased to take up this opportunity to respond to this consultation from its own UK-based experience as a provider of two forms of telecommunications relay services.

#### **Overview**

Significan't (UK) Ltd (henceforth referred to as SVCC ) welcomes the conclusions reached by the OfCOM in the consultation document especially that it recognises that:

- Deaf people who use British Sign Language (BSL) has no access to the telecommunication networks at present.
- Current Text Relay Services is not seen as an equivalent form of access to the telecommunications networks and that modernisation of this is being called for.

SVCC recognises that the OfCOM is restrained by the particulars as defined under the 2003 Communications Act and that this consultation document has been formulated within this remit. SVCC is concerned that this restraint has apparently precluded OfCOM from looking at solutions that currently exist in other parts of the world and/or being more innovative with the solutions proposed to achieve equivalency for deaf and hard of hearing users of telecommunications.

The reaction of the deaf and hard of hearing communities towards the restrictions proposed within the document should be understood and appreciated in the light that no one wants to be told that they have a “restricted” service and we believe that to impose a restriction on the usage of the telephone by deaf and hard of hearing people in itself is not conducive to the principle of equivalence of access equal to that enjoyed by the wider community.

In this response document we have made some observations, suggestions and proposals that may or may not need some revision of the current “straitjacket” as defined by the 2003 Act. SVCC recognises that some of its suggestions may necessitate either a new Order from the current Secretary of State for Culture, Media and Sports or be considered in the new Act itself. Having said that SVCC would like to draw attention to the proposal of a “pilot” scheme in which the aspirations of deaf and hard of hearing communities are tested out and the data gathered are to be used for a mandated service if one is required. SVCC believes that this is possible within a “voluntary” scheme established by collaboration between current relay service providers, telecom companies, deaf and hard of hearing consumer organisations and the Government.

### **Question 1**

SVCC agrees with the assertion made by OfCOM that the Text Relay Service in its current guise falls short of the requirement for full equivalence. This, by default, makes this question redundant. Any improvement in the technology used and/or delivery mechanism(s) would be better than the current Text Relay Service. The technology is available today as proven by text-based relay services currently used in other parts of the world and shown in the pilot carried out by SVCC's Smart Captions service earlier this year where it was measured that after a short training period the captioned relay service operated at an average speed of 143 words per minutes over both directions at the beginning of the pilot project and after 12 weeks this increased to in excess of 160 words per minute over both directions. Comments from participants stated that the people at the other end were amazed by the ease of usage and speed with some saying that they had people asking if their hearing has been restored. This proves that true equivalence can be achieved if the conditions set are empowering and has the end user in focus rather than the actual technology or delivery processes. For SVCC this is important as this approach enables providers of NGTR to focus on their specialist expertise and deliver targeted services using the best possible technology efficiently. SVCC envisages a tremendous savings in costs by adopting newer technologies as they emerge and do not wish to see any proposals that restrict by defining how the service is delivered.

### **Question 2**

SVCC believes that the restrictions on OfCOM as imposed by the 2003 Communications Act has resulted in the consideration of the GC15 route which in itself does not auger well for the development of the NGTR. It goes against the principle by which all commercial operations are run by – to make a profit – as it imposes a cost that increases the more it is used. SVCC believes that the GC15 route would naturally lead to the minimum level of functionality and that newer technologies are ignored by virtue that adoption leads to an increase in usage and/or customers leading to greater losses for that telecom operator. Commercially this is a non-starter in its current format.

### **Question 3**

Given that the technology is available today – SVCC do not believe that it would take 18 months to implement the NGTR. Six months is a more realistic time period if the requirement to deliver equivalence is to be met.

### **Question 4**

SVCC agrees with this statement as it is evidenced that deaf people who use BSL do not have any other means of access to telecommunication networks as it is necessary for them to have a level of fluency in written/typed English in order to have access to text-based relay services and/or SMS services.

### **Questions 5 to 7**

SVCC questions the rationale behind the two different approaches the OfCOM has taken to impose some form of control of the funding for NGTR and VR services – the former has a suggested cap of £15m on funding and the latter there are a number of restrictions affecting the flexibility for the deaf individual to make and receive phone calls by imposing suggested restrictions on opening

hours, number of minutes used by the deaf caller per month and the context in which the calls are made in – business or domestic. SVCC calls for a sensible cap on the funding and a minimum set of quality standards/KPIs on the delivery of VR services. Once that is done the specifics are left to the individual service provider to determine the accessibility and provision of VR services beyond those restrictions if so desired.

SVCC believes that the restrictions imposed on deaf users of VR services as suggested only serves to offend people. Furthermore the calculations based on averaging as used in this consultation to reach the number of minutes is in itself flawed as it assumes that everyone makes the same amount of calls in any given month. SVCC believes that there are better methods such as pooling the average usage in minutes together enabling those who have a greater dependence on the telephone utilise the minutes that are not used by others in that month.

SVCC believes that there is scope for the costs to be passed on to businesses taking calls from or making calls to deaf customers via a VR service. SVCC acknowledges that this may require some changes in the current Communications Act.

## **Conclusion**

SVCC welcomes the findings and statements in this document in relation to the current lack of equivalence for deaf and hard of hearing people in accessing the telecommunications networks.

SVCC believes that the current restraints on OfCOM's ability to look at solutions outside its current remit in itself has had a substantial impact here.

SVCC welcomes the recent initiatives taken by the Government in calling together all stakeholders with regard to equivalence of access to telecommunications services and believes that in order to ensure that the best possible solution for equivalence is achieved, a pilot scheme of no less than three years is necessary using the current expertise and services operating in the UK to determine and gather data that would lend to a better model for newer forms of relay services. In the meantime the current universal service obligation and mandate for Text Relay Service should be maintained in parallel with the development of newer forms.