

30 March 2021

Competition Group  
Ofcom  
Riverside House  
2A Southwark Bridge Road  
London SE1 9HA

By email only: [emergencyBSL@ofcom.org.uk](mailto:emergencyBSL@ofcom.org.uk)

Dear Sir/Madam

**Response to Ofcom consultation: Emergency video relay – further consultation**

BUUK has been providing gigabit ready full fibre broadband connections to the new build housing sector since 2008 and our fibre networks are often chosen by developers in preference to the solutions offered by the monopoly incumbent. We also operate a wholesale business, Open Fibre Networks (Wholesale) Limited, offering wholesale services to Communication Providers across the UK.

BUUK is supportive of Ofcom's proposals to establish a free, 24/7 video relay service for deaf BSL users to enable them to communicate with the emergency services. We welcome the clarification that this consultation provides in terms of presenting options for the way the arrangements will work in practice.

We agree that appointment of a wholesaler, akin to the provisions in place to support emergency voice call handling, text relay and SMS arrangements, is likely to represent the most pragmatic approach. We recognise the financial risks that a wholesaler could face if it were to contract with a video relay supplier for the provision of emergency services and was unable to secure payment for services subsequently supplied on behalf of regulated providers. Given the benefits of these services in terms of securing equivalence of treatment, and the prudence of minimising financial risk for any potential wholesaler, we are supportive of a requirement on regulated providers that obliges them to pay toward the cost of these services.

While we note the essential nature of video relay services for deaf BSL users, we think it is important that any service is provided at an efficient level of cost. We are therefore supportive of the inclusion of a clause within the approval criteria for suppliers of emergency video relay services, which requires fair, reasonable and non-discriminatory terms.

We believe that it should be possible for deaf BSL users to access emergency services via a video relay on the same basis that access to standard emergency calls is provided. In this respect, we support the proposal that the data used for emergency video relay should be

zero-rated. This would also avoid situations where customers that may have used their data allowance for a given period, are unable to access emergency support via these services.

In addition, recognising the potential delays that could be created in a time-critical emergency situation if customers were required to register for the video relay service, we agree that end-users should not be required to register to access these emergency services.

We would be happy to provide any further clarification to our responses if that would be helpful.

Yours sincerely

[✂]

Regulation Director