

## Your response

Question	Your response
<p><b>Question 1: Do you agree with our proposal that regulated providers should be required to either provide emergency video relay or contract for it to be provided?</b></p>	<p>Yes, we agree with Ofcom’s proposal to ensure the provision of a resilient and viable emergency video relay service.</p> <p>The UK Council on Deafness, the umbrella body for organisations working with deaf people, has been continually campaigning for the provision of emergency video relay to allow deaf people to access 999 emergency services in British Sign Language to allow for faster and more accurate calls to emergency services. We believe emergency video relay has the ability to prevent fatalities within the deaf community as well as enabling deaf children and adults to access emergency services for the benefit of wider society and potentially save the lives of others. We will not repeat the evidence we provided in our response to the first consultation on this point.</p> <p>Given the importance and urgent need of emergency video relay, we urge Ofcom to conclude the consultation as swiftly as possible and not delay the implementation date any further.</p> <p>We also strongly urge Ofcom to work closely with the deaf community throughout the remainder of the consultation process and when approving a provider for the service. We all remain committed to working with Ofcom for the rest of this process.</p>
<p><b>Question 2: Do you agree that the Approval Criteria should contain a requirement obliging suppliers of approved emergency video relay services to include a clause about fair,</b></p>	<p>While we acknowledge that this question is directed towards industry, we would support a fair and reasonable clause to ensure the swift</p>

<p><b>reasonable and non-discriminatory terms in any contract with any Regulated Provider or wholesaler?</b></p>	<p>implementation of emergency video relay and prevent any further delays.</p>
<p><b>Question 3: Do you agree with our proposal that data used for emergency video relay should be zero-rated?</b></p>	<p>Yes, we agree. In line with the principle of equivalent access for disabled users, it is essential that the data used to access and use emergency relay is also free to the end user, to the greatest extent feasibly possible.</p>
<p><b>Question 4: Do you agree with our proposal that end-users should not be required to register to access or use emergency video relay?</b></p>	<p>We support the principle that end-users should not be required to register to access or use emergency video relay in line with the principle of equivalent access, as well as to prevent any unnecessary barriers to end-users using emergency video relay. However, we note that there might be a trade-off between the need for prospective users to provide information, such as a mobile phone number, and the ability to receive call-backs from the emergency services, either directly or via a link in an SMS message.</p> <p>We hope that Ofcom can look for alternatives to mandatory registration which will encourage users to provide the information necessary to receive call backs from the emergency services. This could be done via the optional provision of information at the time a user downloads the app, an entirely optional registration process or through the protocols established for the interpreters and call-handlers taking a 999 call.</p> <p>We therefore welcome the amendment to the draft Approval Criteria – but encourage Ofcom to work with the approved providers to explore effective mechanisms which allow users to receive call backs.</p>