

# OFCOM REVIEW OF RELAY SERVICES

13<sup>TH</sup> JULY 2012

Cable&Wireless Worldwide (CWW) welcomes the opportunity to respond to Ofcom's latest consultation on the review of relay services. Our network currently carries about 800 text relay (TR) calls a month, which according to Ofcom figures would suggest that TR traffic on our network accounts for less than 1% of TR calls across industry. It is also worth noting that a high proportion of our TR calls are to 999 services.

We are, of course, supportive of any initiative which improves services for disabled users, and will work to ensure compliance with the new General Condition once Ofcom has published its final statement.

This latest consultation asks three very specific questions, which we do not have any particular view on. However, we do have one concern which we don't think is adequately addressed.

## **BT'S CHARGES FOR WHOLESALE ACCESS TO THEIR NGTR SERVICE**

In Section 3 of the consultation document Ofcom sets out that it is happy that its projected costs for the implementation are satisfactory and that BT's assertion that to implement the service will be significantly more, is due to BT choosing to implement aspects of the service beyond the minimum required by Ofcom.

Whilst we are happy with Ofcom's explanation of this, we don't feel Ofcom has fully addressed the issue. It is one thing for Ofcom to carry out impact and proportionality assessments based on their understanding of implementation of the improved service, but these are not relevant to smaller operators if the supplier(s) choose(s) to implement the service in a way that costs them more than Ofcom's assessment.

Unless another service comes forward in competition with BT for a NGTR service, BT can develop the service anyway it wishes and therefore (as recognised by Ofcom) BT will want to recover its costs in the charges it imposes on its wholesale customers.

By not controlling the implementation of a NGTR service, Ofcom is allowing BT (or any other service operator) to set up the service it wants with the expectation that it can recover its costs from its wholesale customers.

We appreciate the answer to this problem is for operators to set up their own minimum service, but this potentially would not be cost effective for an organisation like ours which has minimal text relay service users, rendering Ofcom's proportionality assessment inappropriate.

Ofcom must work further with BT to seek assurances that their charges will not be significantly higher than Ofcom anticipate simply because BT chooses to implement in a different way than Ofcom originally intended.

The issue of cost control is something we raised in our response to the original consultation.