

Ofcom consultation on new voice services

Response from TAG

1. TAG welcomes the opportunity to respond to the Ofcom consultation on new voice services. TAG is a consortium of the main national and regional organisations in the UK for deaf, deafened, deafblind and hard of hearing people which aims to ensure that these customers have access to all forms of electronic communication services and facilities at equivalent cost and with similar ease of use to that enjoyed by hearing people. In this response the word “deaf” will be used to cover the complete range of hearing loss, unless otherwise specified.
2. TAG welcomes the fact that Ofcom realises the significance of the changes that these new services will bring and has consulted on them at the earliest opportunity. TAG agrees that these new services offer significant opportunities and would not in any way wish to stifle their development, and also agrees that they should not be expected to offer the same features as traditional services in every case. TAG also realises that, as long as they are developed appropriately, these new services have the potential to benefit deaf users and give them greater inclusion in mainstream services. However, TAG does have strong concerns that unless adequate steps are taken consumers are likely to be confused as to what exactly these services offer, and that this could lead to detriment and even danger for vulnerable users.
3. As TAG is concerned with a specific user group we do not think it useful to answer every question posed in the consultation, but prefer to focus this response on the issues that are of concern to deaf users, especially access to the emergency services.
4. TAG understands that if access to the emergency services is offered by these new voice services it may not be as reliable as traditional forms of access, and that this is not because of any unreliability of the hardware but because some methods of implementation may be less reliable than the traditional telephone network. We also accept that it is likely that these new services will be used alongside more traditional methods which will continue to provide reliable emergency access.
5. Nevertheless TAG has strong reservations that any provider should be allowed to offer an emergency service that offers anything less than total reliability, and would prefer that they should not offer such a service at all if this reliability cannot be guaranteed. Providing information at the point of sale is not an effective solution since it cannot be guaranteed that users will properly assimilate this information or that they will remember it later when faced with an emergency. It is also unlikely that providers will be willing to stress what their services are unable to do reliably at the point of sale, since this is hardly likely to help sell the services. Providing information at the point of use is even more unlikely to be effective, as again it would involve labelling the product in a negative fashion. Even if such labelling was provided it could very easily be forgotten or disregarded in an emergency situation.

6. TAG accepts that confusion may be reduced if the way in which the service is provided looks different from a traditional form of delivery. For example, most people might realise that if you are accessing the service from your computer it is not the same as doing so from a traditional telephone handset. However, we understand that these new voice services may be delivered using equipment which looks exactly the same as traditional telephone equipment, in which case there is a real possibility of confusion as to what is reliably provided. The consultation document mentions the use of equipment by visitors such as babysitters, to which TAG would add vulnerable consumers such as deaf people. TAG is particularly concerned about the dangers to deafblind users, for whom labelling would not be effective. The consultation document also mentions the use of recorded messages, but TAG would point out that these may cause problems for hard of hearing people, and would obviously need appropriate equivalents for text users.
7. User expectations are that if access to emergency services is provided it will be on a reliable basis. TAG feels there could be legal liability if death or injury resulted as the consequence of a less than reliable emergency service being used. We therefore believe that the proposed course of action is unwise and even dangerous and would prefer to see new voice services offering either reliable emergency access or none at all.
8. If Ofcom decides against such an approach TAG would in that case wish to see some form of mandatory Code of Practice setting out the requirements for ensuring that consumers receive adequate and appropriate information. TAG does not believe this can be left to providers on a voluntary basis. We are already finding that consumers are purchasing digital set top boxes and then finding they do not provide the full range of interactive services, and this information is not available at the point of sale or in product literature.
9. This issue is linked to the question of what CLI these new voice services would be likely to provide. TAG's understanding is that they may either use geographic numbering (in which case they would presumably be used from a fixed location and the CLI given would be appropriate to that location) or may be allocated a number in the new 056 range. TAG's assumption is that the 056 numbers would be more likely to be used for nomadic services, for which the provision of location information via CLI is more problematic. This assumes even greater importance if such a nomadic service also offers unreliable emergency access, as in the event of a failed call there would be no reliable location information which the police could respond to. It is therefore imperative that nomadic equipment using new voice services gives location information in the same way as mobile networks do at the present time.
10. It should also be pointed out that many deaf users rely on CLI to determine what type of call is being received and how to answer it. The fact that new voice services may use both geographic numbers and the 056 range will make it more difficult to know whether an incoming call is using these services or not.

11. TAG welcomes the fact that the consultation document refers to interactive text communication and the potential problems for text users, but notes that no solution to these potential problems is proposed. It is imperative that as new voice services are developed they should be inclusive in design and that they should not disenfranchise certain groups of users, such as those who require the use of real time interactive text communication. We understand that the term “new voice services” is in fact shorthand, and that data and video services are also included, but it is imperative that these developments do properly recognise the need for such services and that they are considered in the early stages of the design process.
12. There seems to be a good deal of confusion in the terminology that is being used. Many people do not understand what is meant by Voice over IP or Voice over Broadband, or that the two terms are not synonyms. There is also confusion between the use of IP within networks, such as BT is now doing, which is completely transparent to the user, and the use of new equipment allowing a different range of services through the use of IP. TAG believes that Ofcom should issue a leaflet explaining the services and the terminology in simple terms so that consumers gain a proper understanding of how they work and how they are likely to affect their communication experiences.
13. This is especially important if these services are to be promoted to profoundly deaf users, who might regard anything that appears to focus on voice to be irrelevant to their needs. Therefore promotional material needs to make it clear that data and video services can equally be carried. It also needs to be stressed that these new services must offer voice services of good sound quality, or they will not be usable by hard of hearing people. Current telephony services which offer a limited frequency range may cause problems for hard of hearing users, and therefore the frequency range offered by IP services must cover all speech frequencies. TAG proposes that trials of these new services should be carried out with hearing aid users.
14. Voice over IP has the potential of providing higher quality connections than the PSTN, and TAG considers these should be offered as a standard feature of these new services. It is also vital that these new services provide end to end communication in an inclusive manner, so that deaf users can continue to communicate as effectively as they are currently able to do, and hopefully in an improved manner.
15. TAG is already receiving anecdotal evidence that business firms are switching their telephone networks to IP based systems and that they are implementing these in such a way that textphone users are disadvantaged. An employee who has regularly used a textphone at his workplace when a more traditional PABX system was in place may suddenly find he no longer has a means of textphone communication and is therefore unable to carry out his or her job. This is likely to be caused simply by lack of thought in the implementation stage rather than any conscious desire to prevent textphone communication. TAG strongly recommends that Ofcom considers issuing guidelines on how corporate IP based systems should be set up in order to avoid such problems.

This would not be a technical document, but one which set out the issues that would need to be considered when implementing such a system.

16. These new services are also likely to create new billing patterns, and TAG is concerned that text users are not disadvantaged as a result. Currently General Condition 15 places an obligation on providers to recognise that text communication takes longer than equivalent voice communication and to offer special tariffs to text users to offset this. Since one major selling point of these new services is likely to be the cheap call rates that they offer TAG is concerned that the fact that text communication takes longer will continue to be recognised by appropriate billing arrangements. Regulation will almost certainly be required to achieve this, and this needs to be kept in mind when tariffs for the 056 range are considered.
17. In conclusion, TAG welcomes the development of new voice services, but has some concerns about their use by deaf consumers. Clear and full information is needed on their possibilities and limitations. TAG is chiefly concerned that these new services may offer less than reliable access to emergency services, and does not support the approach that less reliable access is better than none, believing this to be dangerous for vulnerable users.

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