

Ofcom Consultation on the Review of Relay Services Further consultation

Response from DAART

Introduction

DAART (Deaf Access to Alternative Relay in Telecommunications) Campaign is a campaigning group of individual consumers who may or may not have any representation through deaf or hard of hearing organisations and would like to add their voice to the campaign for the introduction of alternative relay services in the UK.

DAART has participated in the overall discussions with the UK Council on Deafness (UKCoD) and the Telecommunications Action Group (TAG) to this consultation and we endorse the points raised in their response.

DAART would like to reiterate what the UKCoD / TAG response highlights, there have been 12 consultation or research studies on this important issue since 2004 and yet these processes have not materialised in the implementation of alternative relay services after 8 years.

DAART maintains and said in its last consultation that there are already tried and tested relay systems in operation that could meet the needs of the deaf and hard of hearing users and this technology has been available for the last 12 years. We believe this is a serious omission from Ofcom in this consultation in favour of a proposed NGTR without further information or detail about this. In addition this proposed NGTR is yet to be developed and be tried and tested.

DAART also express concern that this consultation document did not take into account the responses of the ten out of thirteen stakeholders groups who would like to see Captioned Telephone Relay being an alternative real time functional equivalent relay service in the future. The document focuses purely on NGTR as a viable alternative which is disappointing.

DAART is unhappy that we continue to be in a position where Ofcom is still consulting on telephony access. The slow progress on this issue is unacceptable especially when Ofcom had access to a range of user groups providing them with solutions as to how relay services can operate in the future.

Question 1: Do you agree that in light of the additional cost data and further clarification, in light of Ofcom's assessment of relevant benefits and other considerations, all CPs (BT, fixed and mobile providers) should be required to provide access to an NGTR service?

DAART's position on this has not changed since the last consultation; we believe that the obligation to provide or, more accurately, to ensure functional equivalent access should be a responsibility of all communication providers (CPs).

DAART has maintained that a funding mechanism is needed to ensure that a range of relay services become available that meets the needs of a range of deaf, hard of hearing and DeafBlind users. This will promote competition and choice for users and lead to improvement of quality of service from providers.

DAART was surprised to learn that CP's believe that NGTR is not needed and deaf and hard of hearing users can use alternative means of communication available such as email, sms or live chat. May we remind them that hearing people also have access to these alternative means of communication AS WELL as have functional equivalent access to the telephone. They have a choice. Deaf and hard of hearing people would also like to have the freedom to make this choice as well not to have the choice imposed on us as an alternative.

Question 2: Do you agree that the need to dial a prefix to access a relay service for incoming calls to the hearing and/or speech impaired end user should be removed?

DAART supports what UKCoD and TAG have stated in their response to this question.

DAART would like to use same telephone numbers like everyone else and have no prefixes.

Question 3: Do you agree with the proposed approval criteria and KPIs? If not, please specify your reasons.

No

The proposed transcription speed of 60 words per minute (wpm) as a KPI should not be the benchmark and this should be raised to a minimum of 125 wpm. This will provide close to functional equivalent access to the telephone. There is already relay service systems developed that can provide a benchmark using a standard script at 125 wpm, 98% accuracy and 8 second delay.. Many relay providers use this system.

DAART believes if the KPI's was set to a higher benchmark of 125 wpm as a minimum, the system will be able to meet the needs of a larger section of the deaf and hard of hearing sector.

Future service providers should have a system that is capable to operate at the fastest speed i.e 125 - 180 words per minute. (This system already exists and is operational) From this the system can be customised to slow down to meet speed requirements for text relay users and for DeafBlind users.

This cannot happen if it is the other way round. ie a system that is developed that can operate at 60 words per minute as a benchmark. This cannot be speeded up to meet the needs of hard of hearing users who require a minimum of 125 wpm to have a real time, functional equivalent conversation

Therefore proposing 60 words per minute is not acceptable and KPI's should be set to 125 wpm to ensure any system have the capacity to meet the needs of all deaf and hard of hearing users.

If Ofcom wishes to have one provider then it should be the provider that can deliver the fastest speeds and then build in slowing mechanism for other users identified and mentioned above.

Conclusion

DAART remains concerned that the proposals show a lack of understanding of how captioned relay operates and ignores the fact that the system is readily available. This has been circumvented by providing proposals for NGTR without providing details of how it will operate. The proposed KPI of 60 wpm as a benchmark does not give confidence that the NGTR will represent the changes and improvements that are sorely needed for deaf and hard of hearing people

DAART reiterates that the way forward is to develop a funding model to support **ALL** relay services and allow potential providers to put in tenders that meet high KPI specifications to provide this. This will promote innovation, competition and promote choice for all deaf and hard of hearing end users

DAART supports the conclusion from the UKCOD/TAG response.

**DAART
July 2012**