

Consultation Response

Review of Relay Services – further consultation (Ofcom)

13 July 2012

About us

Action on Hearing Loss is the new name for RNID. We're the charity working for a world where hearing loss doesn't limit or label people, where tinnitus is silenced – and where people value and look after their hearing.

Our response will focus on key issues that relate to people with hearing loss. Throughout this response we use the term 'people with hearing loss' to refer to people with all levels of hearing loss, including people who are profoundly deaf. We are happy for the details of this response to be made public.

Comments

Action on Hearing Loss welcomes the opportunity to comment on the further consultation on the review of relay services. We responded to the previous relay services review in October 2011 and we will therefore limit our discussion on issues that are covered in our original response as these views still stand.

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 relevant considerations, all CPs (BT, fixed and mobile providers) should be required to provide access to a NGTR?

We absolutely agree that all communication providers (CPs), including BT, fixed and mobile providers, be required to provide access to a NGTR service.

With mobile communication the norm, it is vital that people with hearing loss are also able to communicate in this way. Whilst text messages are useful for contacting friends and family, on the whole many services remain accessible only by telephone and therefore access to the NGTR (Next Generation Text Relay) service through a mobile phone is not just important, it is vital. The ability to access

NGTR through any CP will help to create a level platform for deaf and hearing people to communicate. This will allow services, businesses and strangers to contact people with hearing loss, thereby promoting equality.

The European Universal Service Directive, Article 23a, states:

1. Member States shall enable relevant national authorities to specify, where appropriate, requirements to be met by undertakings providing publicly available electronic communication services to ensure that disabled end-users:

a) have access to electronic communications services **equivalent** to that enjoyed by the majority of end-users; and

(b) benefit from the **choice** of undertakings and services available to the majority of end-users.

To achieve equivalence it is important to give access to mobile phone communication to both people with hearing loss and hearing people. If only some CPs were required to provide access, this would severely limit choice for people with hearing loss and restrict access to communication services in comparison with other end-users. This would therefore **not** be an equivalent service.

We believe that limiting the availability of NGTR through only selected CPs would be an extremely retrograde step and therefore we are absolutely in support of Ofcom's proposal to ensure all CPs provide access to a NGTR service.

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?

We absolutely agree with the proposal to remove the need to dial a prefix to access a relay service for incoming calls to people with hearing loss. Hearing users are confused by the number and it is therefore a barrier to making calls.

We are however disappointed that Ofcom are proposing the prefix to remain for outgoing calls. We would like to see this issue investigated in parallel to see whether complete removal of a prefix would be possible in future.

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

We agree with the majority of proposed approval criteria and KPIs although we are disappointed that our suggestions for further KPIs as stated in our previous response have been rejected.

We welcome the KPI for greater than 98% accuracy. We believe accuracy is extremely important, particularly when people can enter into contracts by telephone. Both parties in the telephone call therefore need to be confident in the accuracy of the conversation.

We do however reject the proposed KPI for voice to text transcription of only 40 wpm, with an average of 60wpm. In our response to the relay consultation last year we stated that “It is important that conversation speeds are as near to a standard voice call as possible.” We believe that technology and ‘operator’ skills can achieve much higher transcription speeds and therefore we would strongly urge Ofcom to reconsider this KPI.

Also, with the removal of GSC 4 (the requirement on BT and Kingston Communications alone to provide relay services) there is no longer a business incentive on the relay provider to increase the speed of transcription, and thus reduce the length of the call. The relay provider would be able to profit from unnecessarily long calls by recharging the other CPs. It is therefore important that the KPI reflects achievable speeds in order to benefit deaf people, hearing people and the other CPs and promotes further development of the service as technology matures over time.

We believe that with technological developments it is likely that this KPI can be further increased in future to ensure that people with hearing loss benefit from these developments. We therefore reiterate our recommendation that all KPIs are reviewed regularly to ensure that they remain relevant and comprehensive in relation to technological developments.

Conclusion

We absolutely agree with the requirement on all CPs to provide access to a NGTR service. This is vital to ensure an equivalent service for deaf and hearing people. We also agree with the removal of the pre-fix on incoming calls but urge Ofcom to consider ways in which the outgoing pre-fix could also be removed. Finally, we would

like the KPI around transcription speeds increased to ensure full benefit of the service is received by deaf and hearing people as well as other CPs and so that the service is encouraged to further develop over time.

Contact details

Laura Matthews
Social Research and Policy Officer
laura.matthews@hearingloss.org.uk

Action on Hearing Loss
19-23 Featherstone Street
London
EC1Y 8SL