

BASIC DETAILS

Consultation title: **Changes to general conditions and universal service conditions**

To (Ofcom contact):

Name of respondent: Laura Matthews

Representing (self or organisation/s): The Royal National Institute for Deaf People (RNID)

Address (if not received by email):

CONFIDENTIALITY

Please tick below what part of your response you consider is confidential, giving your reasons why

Nothing	<input checked="" type="checkbox"/>	Name/contact details/job title	<input type="checkbox"/>
Whole response	<input type="checkbox"/>	Organisation	<input type="checkbox"/>
Part of the response	<input type="checkbox"/>	If there is no separate annex, which parts?	

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DECLARATION

I confirm that the correspondence supplied with this cover sheet is a formal consultation response that Ofcom can publish. However, in supplying this response, I understand that Ofcom may need to publish all responses, including those which are marked as confidential, in order to meet legal obligations. If I have sent my response by email, Ofcom can disregard any standard e-mail text about not disclosing email contents and attachments.

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Name: Laura Matthews

Signed (if hard copy)

Consultation Response

Changes to General Conditions and Universal Service Conditions (Ofcom) 7 April 2011

About us

We're RNID, the charity working to create a world where deafness or hearing loss do not limit or determine opportunity and where people value their hearing. We work to ensure that people who are deaf or hard of hearing have the same rights and opportunities to lead a full and enriching life. We strive to break down stigma and create acceptance of deafness and hearing loss. We aim to promote hearing health, prevent hearing loss and cure deafness.

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 who are deaf, deafened and hard of hearing. RNID is happy for the details of this response to be made public.

Comments

RNID welcomes the opportunity to comment on the consultation regarding changes to General Conditions and Universal Service Conditions.

Change to General Condition 15

We agree that the emergency SMS service should be mandated to ensure continued access to emergency services using mobile phones, however, we do not agree that in itself it provides an equivalent service to that available for people with hearing loss.

Whilst the eSMS service has allowed a real improvement by providing a useful alternative for access for people with hearing loss, eSMS text conversations take much longer than a voice call, are not necessarily appropriate for people who have BSL as their first language and, as a 'store and forward' service, are not functionally equivalent to real time access to the emergency services. We would therefore urge Ofcom and telecommunications companies to continue to investigate alternative options for people with hearing loss.

We agree that promoting awareness of eSMS to people with hearing loss should be part of the mandate as this will help to ensure that more people can benefit from this system.

116 Services

Whilst it may not be proportionate at the moment to mandate for SMS access to 116 services, we believe that this should be the ultimate aim for Ofcom and telecommunication providers. The method of achieving this should be investigated as well as other options for people with hearing loss to contact these services.

Conclusion

We welcome Ofcom's proposal to mandate the eSMS service. We believe this service provides a fantastic improvement in access to emergency services for people with hearing loss. We do however believe that further development and research should be conducted to ensure that people with hearing loss have access to equivalent communication services, and look forward to responding to the forthcoming consultation on wider relay services.

Contact details

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