

Title:

Mr

Forename:

John

Surname:

Walker

Representing:

Self

Organisation (if applicable):

University of Sussex

Email:

What do you want Ofcom to keep confidential?:

Keep nothing confidential

If you want part of your response kept confidential, which parts?:

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Ofcom should only publish this response after the consultation has ended:

Yes

Additional comments:

Can I congratulate you on this inquiry, I feel that this is one of the single most empowering moments for the Deaf community in the UK this decade.

Question 1: Do you agree that NGTR would provide greater equivalence than the existing approved TR service? Do you agree that we have considered an appropriate range of improvements:

Yes, there is a missing element of voice/TR service whereby deaf people, who have speech, can communicate with their family and friends in the communication method that they use face to face. This is something my mother would appreciate when she talks to me on the phone.

Question 2: Do you agree with the proposal to implement NGTR through the amendment to GC15? Do you agree that the criteria we propose satisfactorily embody improvements we suggest for NGTR:

Yes I agree. But I feel that VR service should be written in equivalently into NGTR.

Question 3: Do you agree that a period of up to 18 months for implementation of NGTR, following an Ofcom statement, is appropriate:

If it is appropriately required.

Question 4: Do you consider that the requirement to ensure equivalent services for disabled end-users would require a mandated VR service in some form for BSL users? Please indicate the basis of your response:

Despite the development of text relay and its success to enable deaf users to access a form of telecommunications, it has never reached a level of equivalency. A video relay service would place Deaf people, who use BSL as their main means of communication, to use telephony in equivalence to other non-disabled users. The level of English competency in the Deaf community is now at an average of a reading age of 12. The persistent use of text relay places BSL users in the dark ages of technological development.

Question 5: Do you agree that a restricted service would be more proportionate in providing equivalence for BSL users than an unrestricted service:

I do not. The restriction places limits on how the VR can be used and BSL users will not receive the full benefits of the service. It is an equivalent for non-disabled users to simply pick up the phone and call another person 24 hours, 365 days a year. The restriction is arbitrary and the very tool to liberate Deaf people's ability to communicate remotely will limit their freedoms in the restrictions remain in place.

Question 6: Please provide your views on Methods 1 ? 5 for a restricted VR service discussed above. Are there any other methods that are not mentioned that we should consider? In making your response, please provide any information on implementation costs for these solutions which you believe is relevant.:

I do not agree with the number of hours available to each user nor the hours of service. Also, I do not agree that the service is limited to non-employment conversations, this is impossible to police and places room for confusion on how the new services can be used.

I would suggest an unrestricted service in one location for a duration of 6 months in order to

identify the mean service use in that area. I don't not agree that data from the states, Sweden or Australia to be reliable in making these decisions. Once the services has been piloted, you can then predict that average level of usage per person and the time when it takes place; against costs. Then you should provide an 'unlimited' provision, which states parameters for 'excessive use'. This is similar to the unlimited data packages provided by mobile phone companies, where 'unlimited' is defined with some restrictions.

Question 7: Do you agree that a monthly allocation of minutes combined with a weekday/business hours service would be the most appropriate means to restricting the service:

No. This is because you have also stated that use should not be related to business. As most people will be at work, how will the service be used - if at all.

As described in question 6, the service should be 'unlimited' with clauses to describe what is 'excessive use', similar to companies provided data to mobile phones. But in order for the VR system to empower and enable BSL users, it must be 365 days per year and 24 hours a day.