

Title:

Mr

Forename:

John

Surname:

Sabine

Representing:

Organisation

Organisation (if applicable):

Employers' Forum on Disability

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:

You may publish my response on receipt

Additional comments:

We have chosen to present this as a general comment on the issues raised in the consultation document as the majority of our remarks do not fit as responses to the specific questions asked.

Next Generation Text Relay

We accept the arguments that favour NGTR over Captioned Telephony as an appropriate direction for development of the current Text Relay service, and support the improvement in services that this will bring. We recognise that it falls short of full equivalence with voice telephony services, and that many users may not be satisfied by the proposed service.

We believe that, going alongside this proposed improvement in services, there is also a need for businesses that receive calls from relay service users to improve the ways in which they handle such calls. We realise that driving such an improvement may not be part of Ofcom's remit.

However, we would encourage Ofcom and the Communications Providers to support work that is currently being done to persuade businesses that they should adopt good practice guidelines in order to improve the service they offer to users of relay services, and simultaneously to broaden the range of contact methods they allow, including text and instant messaging, and live online chat. In particular, we would encourage Ofcom and the CPs to support the working group on this issue recently set up as part of the work of the DCMS e-Accessibility Forum.

We would also encourage CPs who provide services to contact centres, to suggest that these contact centres should adopt good practice guidelines in dealing with users of relay services. We would encourage Ofcom and the CPs to consider suggesting the use of the guidelines in our publication, *Your Call is Important to Us*, available for free download at <http://www.efd.org.uk/publications/your-call-is-important-to-us>.

Video Relay

We recognise that a proposal for limited VR availability will be disappointing to service users. We cannot comment on the commercial or business case from a provider point of view, but we note the comments on the availability of BSL interpreters and believe it is important that a VR service is structured in a way that does not unduly affect the availability of BSL interpreters for face to face bookings.

We believe it should be noted that if the proposal to limit VR provision to normal business hours, and use by an individual to 30 minutes per month, is adopted, this may cause problems even in contacting businesses and call centres, especially where the length of a queue may mean that, even for a hearing user, a single call may extend for more than 30 minutes.

It is clear that unrestricted provision of VR services would provide greater equivalence to voice telephony services than a restricted VR service. However, as long as any restricted VR service is subject to regular light-touch reviews to assess the possibility of extending its provision, and does not block any possible future unrestricted service, we do not believe that a desire for unrestricted access to VR services should stop the introduction of a limited service.

Overall

Whatever the final proposal for VR services, we believe that there is a value in improving the existing Text Relay service and moving to NGTR, and in persuading businesses to better serve users of these relay services. We believe that these incremental improvements in service should be pursued whatever is concluded about VR services.

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:

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:

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

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:

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

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.:

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: