HEARING CONCERN TELECOMMUNICATIONS COMMITTEE RESPONSE TO OFCOM CONSULTATIVE DOCUMENT ON NEW VOICE SERVICES

Hearing Concern is a membership organisation with the aim of enabling hard of hearing people to participate fully in society. There are, of the order of, 9 million hard of hearing people in the UK with, in addition, an extensive network of families, friends and work colleagues. Hard of hearing people include those in the early stages of losing their hearing, hearing aid users and text users. It covers all age groups although many will be older. Equivalent access to communications at equivalent cost is vital for hard of hearing people.

The Telecommunications Committee of Hearing Concern deals with access to the telecommunications network for hard of hearing people. Therefore, we welcome this opportunity to respond to the consultation on New Voice Services.

Most hard of hearing people would prefer to use voice telephony if at all possible. However, dependant on the degree and nature of their hearing loss, their ability to make use of voice services varies from minor problems in understanding speech to inability to understand without the aid of visual clues (eg lip-reading).

Accordingly, we are concerned about issues of access to emergency services, access to relay services and quality of voice as these are often critical for hard of hearing people. We are also concerned about the inequalities that can arise for a minority user group in a competitive situation.

We understand that "New voice services" is intended to consider all voice services but is driven by VoIP technology (section 1.3 of the Consultation Document). We wish to emphasise the fact that the IP technology embraces a variety of formats such as text and video as well as voice and that these offer substantial opportunities to improve communication for disabled people as well as all consumers benefiting from "a wider and more innovative range of services" (section 1.5 of the Consultation Document).

We recognise the potential of VoIP systems to improve the lot of hard of hearing people and we would ask Ofcom to consider encouraging the development of new systems and equipment to aid hard of hearing users.

In this response, we have attempted to tie in our concerns with the particular questions posed in the Consultation Document.

1. Development of new systems and equipment:

Our view of VoIP is coloured by the possible benefits of certain types of VoIP for hard of hearing people. So that our response to question 1:

Question 1: What types of new voice services do you envisage becoming available in the future and what characteristics will they have that distinguish them from traditional voice services?

is that we welcome VoIP as a source for new services beneficial to disabled people.

In the Hearing Concern magazine, we recently described Captel – a commercial venture that allows voice telephony with the addition of a text display. We call this a voice *support* system. Many members wrote to describe their problems on the telephone, how they wished to continue with voice rather than move over to a text-phone and how well such voice support appeared to answer their needs.

As we understand it, VoIP would enable the parallel transmission of voice, text and video. This would appear to present a valuable scenario for hard of hearing users – they could have all the benefits of voice telephony but with the added support of text and/or video (to facilitate lip-reading support). We believe that the technology for these is already available and the issue is simply a matter of presenting them in parallel and we would ask Ofcom to encourage such developments by system providers and encourage the development of protocols that facilitate such parallel operation.

However, in the longer term, we should like to go further and eliminate the intermediary human used by Typetalk and Captel as new speech to text algorithms develop. Many users are unhappy with the fact that a third person is hearing the conversation in relay services.

2. Inequalities arising from competition:

Since de-regulation, BT has continued support for older and disabled consumers. However, this is not always the case in the current telecommunications market. Inevitably, the major customer group or the attractive customer group (eg younger mobile users) will influence the thrust of equipment and systems development etc. Regulation tends to be the accepted means of overcoming this problem.

Whilst we agree with the concept that regulation tends to smother development, we believe that some element of regulation or regular review of the market has to be included in Ofcom's consideration of the new services in order to protect minority groups. Having said this, hard of hearing people are not a minority group in terms of numbers (@ 15% of the UK population and likely to increase with changing demographics) but their spending power seems rarely to be recognised.

Therefore, we agree but with some misgivings with the Ofcom view in question 6.

Question 6: Do you agree with Ofcom's initial view that it is not necessary for all voice services to provide the same standard features as traditional telephone services, and that we should instead focus on enabling consumers to make informed decisions?

We believe that it would be an impossible task to regulate all VoIP services as for existing PATS controlled services. Already, uncontrolled VoIP services are available on the internet and one would imagine the development of a variety of new services to accommodate particular niche requirements.

This leads on to questions 7 and 9.

Question 7: Do you agree with Ofcom's initial view that it is not desirable to draw a distinction between the regulation of services that look like traditional services and those that do not?
Question 9: Do you think that a threshold should be set at which new voice services should be required offer the same features as traditional voice services? If so, how should the threshold be set?

It would be all too easy to say that current major system providers cater well for minority groups so that Ofcom should not be too concerned about new entrants to the market. However, we already see the BT market share falling and one could envisage a situation where the current major providers are financially no longer able to give that support.

Therefore, contrary to Ofcom's view, we believe that consumers need to be able to recognise a reliable service with facilities that they know and they would appreciate the concept of a threshold, above which services that emulate existing voice services should be governed by the same regulation. We would accept that in the longer term, when consumers have a better understanding of VoIP services, there could be a case for no distinction. Market share would seem to be a sensible base for such a threshold. Without this, we believe that market forces will make it likely that the current services will decline to such an extent that they become unviable and consumers will lose

the benefit of regulated services with reliable 999 access and services that facilitate equivalence for disabled customers.

Therefore, we suggest an element of separation of new and traditional services on the basis of market share and ongoing review by Ofcom.

3. Access to emergency services:

The need for access is a rare event. However, deaf and hard of hearing people are at greater potential risk as they struggle with telephone systems and remote operators. This is especially so away from one's normal environment where a specially adapted phone or a text-phone may facilitate communication. Ofcom have already highlighted the problem of a stranger to the home not understanding that access to emergency services is unavailable or unreliable. We wish to point out that the hard of hearing person is at extra risk in this situation as they struggle with communication and may not hear or understand any system messages.

In general, we agree with Ofcom on questions 11 & 12:

Question 11*: Do you agree with Ofcom's initial view that consumers sufficiently value having access to 999 in order for them to wish to retain at least one means of 'high quality' (very reliable) access to 999 at home?*
Question 12: Do you agree with Ofcom's initial view that not all voice services should be required to offer access to 999 but that decisions about subscribing to and using such services must be properly informed?

Most users will wish to have access in case of emergency at home but we must remember that there are still people who choose not to have a normal phone line and the concomitant access to 999. Also, if VoIP services develop in the way we hope, many disabled people will wish to rely on VoIP services geared towards their specific needs (eg voice and text in parallel). They may not wish to have a normal telephone line that offers minimal access to friends and family.

The important issue is that those who choose to limit their use to a VoIP service without 999 access should have good information so that they know of the consequences.

However, we are very concerned about the away from home situation and, question 13:

Question 13: Do you agree with Ofcom's initial view that given some new services may not able to offer the same degree of reliability for emergency calls as traditional voice services, it is better that these services are able to provide less reliable access to 999 rather than preventing them from offering any access at all?)

is of great importance to us as we foresee situations where people away from home can be at risk.

The scenario that worries us is where a hard of hearing person in an environment away from home needs to call 999 and the available telephone seems like a normal telephone but has unreliable access to 999. The hard of hearing person will, in our experience with answering machines, try to use the phone for 999 by dialling, not hear any automated warning properly and assume that they are through to emergency services. Then, believing that they are in contact with an operator that they cannot understand, they will give the necessary information and assume that emergency services are acting on the call.

Marking VoIP handsets that the 999 service is less reliable does not, in our opinion, offer a solution. The problem is with the service rather than the handset and Ofcom has no control over handset purchase. In addition, blind or deaf-blind people may not see any marking and any marking has to be attention-getting, durable and not removable. Certainly, a pre-recorded message to say that there is no 999 access is not acceptable to hard of hearing people.

Therefore, we believe that there should be a clear separation between services that offer reliable access to 999 calls and those that do not.

We would also point out that emergency situations may include failure of the power supply. Unlike current fixed line systems, VoIP systems are dependant on power or power back-up. Somehow, this needs to be built into the user knowledgebase so that everyone recognises the issue and do not waste time in emergency situations. We do not consider that mobile phones are an acceptable alternative for hard of hearing people.

4. Quality of voice:

We understand that, although VoIP has potential for improved quality with increased bandwidth, some VoIP systems, especially when working under load, offer reduced quality of voice. Hard of hearing people already struggle with understanding speech and small changes in quality may lead to drastic reduction in message understanding.

We understand that signal delays can also affect quality and, although we have no information, we fear that this may have an increased effect on hard of hearing users compared with hearing users.

We believe that Ofcom should consider this issue seriously.

5. Access to relay services:

People with a significant hearing loss will either not use the phone at all or depend on a relay service. Despite some criticisms, Typetalk is a vital window to the world for many people.

We understand that some commercial VoIP systems already in use do not allow the use of text-phones.

We believe that Ofcom should ensure that all service providers who emulate traditional services should facilitate text-phone data and allow access to Typetalk or some equivalent relay service.

However, we believe that Ofcom should look to improving relay services:

> We have already mentioned that voice support systems have great potential for hard of hearing users. We should like to see the development of standard protocols so that service providers can enter the relay market and provide good relay services at affordable prices.
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> Video systems have already been trialled as a means of allowing sign language users to communicate (many pre-lingually deaf people have poor command of written English so find text difficult) – either directly to each other or, via an interpreter, with a non-signing person. However, some non-signing users have found video systems of help as they can facilitate lip-reading too. Therefore, video-based systems would help a very large group of people and we believe that Ofcom should include this in their concept of relay services as VoIP develops.