

ACOD response to Ofcom consultation on Relay Services

ACOD welcomes the opportunity to respond to Ofcom's recent consultation on Relay Services. We also appreciate the continued efforts of the team to keep us up to date with the project at our regular meetings.

The project is especially welcome given that - despite substantial developments in ICT and communications services in the last twenty years - the current text relay service remains fundamentally the same service which was first introduced in the 1980s.

The issues associated with this are well documented, not least in Ofcom's pre-consultation research, which provided a strong evidence base of user needs and experiences. Given this, proposals to develop a Next Generation Text Relay (NGTR) as well as a mandated Video Relay (VR) service, are both positive steps forward in offering greater equivalence to relay service users.

We would encourage Ofcom to continue to explore issues of equivalence, recognising that services for the majority of the population will continue to evolve and develop at a pace. It is important that equivalence continues to be pursued, and maintained, so that relay users do not – once again – find themselves lagging behind in service provision compared to non-relay users.

For example, ACOD continues to be interested in the potential for voice recognition technology. We are of the view that this technology may well have the potential to be universally available in the near future. We would like Ofcom to consider the potential for mandating this provision in the not too distant future, as part of a suite of service options available for consumers.

Equivalence is also important in terms of consumers experience in interacting with businesses and public bodies; not just in calls between each other. As a result, ACOD was struck by sections 1.19 & 1.20 of the consultation which acknowledged some of these challenges.

We welcome Ofcom's recognition that, in improving this experience, more needs to be done than simply offering better telecoms services. Government, businesses, users and other stakeholders must all be involved in improving the customer experience.

One area where Ofcom could help to make a difference is in monitoring – and encouraging - awareness training in businesses and public bodies. It is quite common to find that such simple technology as hearing loops in public places are not understood and/or maintained by the companies or services who have them installed in their buildings. So, the potential for staff to misunderstand/be afraid of VR or NGTR is huge.

In the event of users being restricted to a small amount of minutes per month, and possibly having to spend several minutes of their precious allowance persuading organisations to accept their calls, there would rightly be considerable anger and frustration amongst the users of the service.

Therefore, we look forward to hearing what actions Ofcom will take to promote this wider dialogue and action by other parties in ensuring that this is not the case. We hope that Ofcom will lead by example and be an exemplar in this in terms of its own interaction with members of the public and other stakeholders.

To respond to the some of the specific questions in the consultation:

Section 4 – Text Relay

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. NGTR, as proposed, would provide greater equivalence in significantly better services for current users, including the facility of interrupting conversation, wider means of access including mainstream terminals and internet telephony and the potential to meet the needs of a wider range of users.

We do have some concerns as to whether proposal offer adequate improvements to meet the needs of some potential users. For example, we would like to see evidence of how well the service would work for those with good speech using text to support a degree of hearing impairment (those who would use or have requested availability of Captioned Telephony). Issues relating to words per minute – and typing speeds versus revoicing – remain very pertinent.

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, however we would like to know how some of the improvements listed will work in practice, for example:

- Access without dialling special prefixes? How will this work? E.g. will there be dedicated numbers for regular users?
- How will NGTR work for hearing callers wishing to make calls to deaf users?

If there is no prefix issues include: alerting hearing callers to fact that they are accessing a relay service and cost.

Question 3

Do you agree that a period of up to 18 months for implementation of NGTR, following an Ofcom statement, is reasonable?

Yes. Although we would encourage Ofcom and communications providers to launch these services as soon as possible, given that these are not new technologies and the benefits which they will bring to consumers.

Responses to Section 5 – Video Relay

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.

Yes.

Question 5

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

Yes, certainly in the initial stages, in view of the costs and limited availability of BSL interpreters and to assess demand.

We recognise that many stakeholders will not want to see a restricted VR service. However, we also recognise that any VR service, even with restrictions in place, will represent a step forward from current service provision. A restricted service is therefore, in our view, more desirable than no service at all.

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?

Yes, however 30 mins/month could quickly be used for example in dealing with bank or similar organisation, especially given the greater length of time relay calls take. There should be urgent wide ranging discussions to get major organisations to take responsibility for cost of calls, calling back and/or providing their own access to BSL users, as we have recently seen with the current BT initiative for their existing BSL customers.

Jo Connell
Chair, ACOD