

Title:

Forename:

Surname:

Representing:

Self

Organisation (if applicable):

Email:

What do you want Ofcom to keep confidential?:

Keep name 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:

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:

I am unsure if it would provide greater equivalence. It would certainly be an improvement of sorts. However, there are a number of issues with the proposals.

One is the lack of clear indication of a separation into user groups to meet specific needs of service users.

- Deaf English users without speech - Faster Text both ways
- Deaf English users with speech - VCO & Faster Text one way
- Hearing people without speech - HCO & text one way

If this was done then the issue with equivalence would be much better.

Also, the current spend of £15m per annum is to be fixed with no increases. Does this include costs for equipment, marketing etc? It is a very small budget compared to what other companies spend in a year. Considering the amount of people that rely on relay services, and are deaf, this seems very small.

No plans to open up for competition are indicated, so where is the incentive to improve services? I do not want to be stuck with only one option. Competition is healthy and makes sure that we can choose which is best for us.

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 with the implementation - we should have equal access. However, I am not sure that NGTR will actually satisfy the criteria equivalence:

- Natural as possible conversations
- Privacy in conversations
- Flow of conversations smooth for both parties
- Flexibility in choice of communication methods & devices
- Access to services whenever required

Referring to the last two in particular - if you place a restriction on when we can use the service, then you are not meeting the criterion for access whenever required. Also, there is no real flexibility in choice of communication methods or devices as there is only one provider. The technology is outdated compared to recent advances such as the iPad etc. And the fact that the differences in users is not taken into account means our individual requirements are not met (refer to my answer to Q1)

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

No. It should be implemented as soon as possible, within six months. The reason for this is because the technology is already available, the software in place. Why wait 18 months to do something that can be done very quickly? The deaf community wants to be able to use the service as soon as possible. Our lives are not on hold for 18 months at a time. We demand a high standard of professionalism and service delivery quality.

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. BSL users communicate visually, and to make them conduct phone calls in English, a language that is not their first language, is to deny them an equivalent service. Also, typing takes longer than spoken phone calls whereas VR services would speed the whole process up, allowing the user to relay the information required very quickly. It would also allow us to use our 'voices' - typing does not enable us to show our emotions or tone of voice.

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

No. The whole point of an equivalent service is in the name - equivalence. Hearing people can use a phone any time anywhere, 24/7. Restricting video relay access is to prevent equal access. Deaf people use the phone and need it as much as other people do. We have businesses to run, jobs to do, lives to live. 30 minutes a month is nothing at all. Plus providing this service only during office hours is not acceptable as many of us work, and cannot use the phone for personal reasons during office hours. Just like normal people!

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.:

- Limit the opening hours and days
- Impose a financial cap on spend
- Allocate fixed amount of call minutes for users of video relay
- Differentiate between workplace and private use access
- Requirement for users to book calls in advance
- Funding by telecom operators proposed

I do not think that many of those restrictions are suitable as they ignore the criteria set out for equivalence of access. We should be able to access phone services at any time. Our deafness should not prevent us from being able to do so - this complies with the Equality Act 2010, as well as GC15. It is not practical to book calls in advance - not everything runs according to schedule, and if the person we are calling is not there, do we have to make an appointment again? It is silly really.

However, I do believe that there should be a difference between workplace and personal access so that if we use the phone at work, the appropriate person will pay for it, not us.

Fixing the amount of time we can make calls for is unrealistic - some calls take longer than others, and some need to make more calls than other people.

I fully support the idea that telecom operators should help pay towards the costs of NGTR - they make millions in profit alone, and are just as responsible as the government to meet the needs of service-users. It works in the USA. Why not here?

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:

Not at all. Like I have said previously, deaf people have jobs and lives to live - to restrict services to office hours is to deny an equivalent service. Perhaps 8 til 8 Monday to Friday would be more appropriate so that we can make calls after work too. Monthly allocation of minutes is not really appropriate either. What happens if we need to make an important phone

call and our minutes have been used up? What then? 30 minutes is NOT long enough - it is perhaps one phone call, two maximum a month. Deaf people need to make phone calls every day. It would be expected that hearing people only make calls for 30 mins a month in office hours only. This should not be expected of deaf people either. I think we should have a pay as you go service - so that people who use the phone more and will use the service more, are sure to have the access they need, while others can choose to use it less. We are not a standard package - we have different needs and wants, and have different requirements of a video relay service.