

10 January 2014

Kiera Bower
Floor 2, Consumer Group
Riverside House
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Dear Keira

Ofcom's consultation on Next Generation Text Relay: Approval of a text relay service

1. Telefónica UK Limited ('Telefónica') welcomes the opportunity to respond to Ofcom's consultation in which it seeks to approve a text relay service designed and offered by BT.
2. We look forward to adding an improved text relay service to the portfolio of services we already offer¹ to ensure that all our customers are able to use digital services confidently. To that end, we are very keen to ensure that the service that is seeking approval is not only fit for purpose in theory, but works well in practice too, such that by the 18 April 2014, Telefónica's customers have an excellent experience using the service.
3. But in order to be assured of that, or even that we will be able to offer our customers a service meeting the minimum regulatory requirements, it is incumbent on BT to ensure that it not only designs a service in good time, but that:
 - a. It provides wholesale customers with sufficient technical detail about the service for them to make an informed assessment about any implementation issues or timings required to meet the 18 April 2014 deadline, and identify any unforeseen consequences;
 - b. It provides wholesale customers with the opportunity to test the service and routing requirements on its own network with sufficient time to allow for any unforeseen consequences to be identified and resolved before the deadline of 18 April 2014; and
 - c. It liaise with its wholesale partners on commercial amendments to the existing Text Relay schedule to the Telephony Reference Offer required to adopt the NGTS with sufficient time to allow any unforeseen consequences to be identified and resolved before the deadline of 18 April 2014.
4. We are concerned that the delay in designing the service and seeking Ofcom's approval, and the continuing absence of any clear technical details, means that BT has not designed a service which we can, as yet, confidently attest to being technically and operationally available to wholesale partners by 18 April 2014 and cannot therefore offer a fully informed support for Ofcom to approve the service.

¹ www.o2.co.uk/accessforall

Technical details

5. The consultation and the correspondence from BT fails to include any clear technical information on the IP aspects of the service. As a minimum, we would expect that a high level technical view of the interconnect design features that allow the IP elements of the service to interact with an existing voice service, is required to determine whether it is a service that can operate effectively for mobile customers. It is unclear to us, based on the information supplied, whether an incoming call, routed via the NGTS will be enough to prompt the app or the handset user to a text number to request the establishment of the IP bearer to the text relay service, which would appear to be required, nor the volume of data the app is likely to use or how the data sessions are effectively retained. None of these details have been made available either by way of meeting with the relevant design team nor by releasing the design document, but they are details that are essential to understanding whether the service will work in practice, on all networks.

Testing

6. In the absence of any detailed technical details, how the service will work in practice remains disconcertingly opaque, exacerbated by the absence of any attempt by BT to propose or agree a testing strategy with its wholesale partners. We note BT appear to be confident that wholesale partners will be required to do nothing but open up the relevant number ranges on their network, but experience has demonstrated that there are often unforeseen matters for which BT need to allow themselves and their wholesale partners the opportunity to resolve, before a complete and fully functioning service can be properly approved.
7. We are also concerned that using the same routing prefixes for the existing and new platforms adds an additional layer of complexity to the testing of the new platform which does not appear to have been acknowledged.

Conclusion

8. We sincerely hope that the next stages of this project, including any notices and contractual amendments that BT need to make in order to ensure that the administration of delivering this service to its wholesale partners is achievable by the 18 April 2014, move swiftly, efficiently and with a great deal more transparency than we have experienced to date.
9. We have been waiting, in anticipation, to progress testing and implementation of this Next Generation Text Relay service and look forward to working with BT to make sure the service is properly tested and the parallel interaction between traditional voice and the IP platforms is fully understood. Until such time we are not sufficiently informed, and we don't think Ofcom can be sufficiently informed, to approve this service as one that is able to meet all the technical and operational requirements.

Yours sincerely

Telefónica UK Limited