



## BT's response to Ofcom consultation document

*“Improving access to electronic communications  
services for disabled people”*

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BT welcomes comments on the content of this document. Comments can be addressed via e-mail to Anne McLaren ([anne.mclaren@bt.com](mailto:anne.mclaren@bt.com))

## **Executive Summary**

BT welcomes the opportunity to provide information to this call for inputs. We already provide a number of services specifically for customers with disabilities and are focused on making our products and services as accessible as possible. We now include onward connect calls from 195 (free DQ) and 198 (special assistance operator) as part of customers BT calls packages and believe this should be standard across all of industry.

We understand the importance of broadband in customers' lives but would question whether increasing obligations for Comms Providers under General Condition 15 is proportionate or necessary. So we welcome Ofcom's willingness to gather evidence before any changes are made.

Ofcom have not asked specifically about the use of online billing but we think this is something that needs to be considered for broadband services, and how this would fit with any additional obligations. Many broadband services or bundles have online billing as the default option and this allows customers to set up the bill on screen according to their own needs. There is also a wide range of data available online which the customer can use to make informed decisions on the best products and services for their needs.

Ofcom has a duty to make sure any changes to the current regulations are based on solid evidence and do not distort the market or lead to unreasonable costs for Comms Providers. While we do already provide some services to broadband customers, we are concerned at the focus on Telecare lines as these are given to a wide range of people and not just those with disabilities.

We are keen to work with Ofcom and across industry to agree a consistent approach no matter which CP a customer chooses.

## **Glossary of Terms**

Protected Services Scheme (PSS) – BT scheme to nominate a third party so customers are not disconnected for non-payment of bills

Free Priority Fault Repair (FPFR) – provides a free priority service to customers with certain disabilities who have registered for the scheme.

Chronically Sick & Disabled (CSDP) – a customer who comes under the Chronically Sick & Disabled Persons Act (CSDPA) 1970. Which in simple terms means the local authority pays some or all of the line rental.

Carelines – (can also be known as Care in the Community, Community Alarms or Pendant Call) are linked to Control Centres operated by the Local Authority or via independent operators.

Telecare Services - system with sensors placed around the home which immediately detect risks such as fire, floods and falls. The moment a risk is detected an alert is sent to a Telecare monitoring centre, summoning help 24/7.

## **Responses to consultation questions**

### **Bills and contracts in accessible formats**

*(i) What do communications providers currently do in order to comply with General Condition 15.9?*

*(ii) Do fixed and mobile broadband service providers currently offer bills and contracts in accessible formats? If not, does this cause particular problems for disabled users?*

We provide Alternative Media bills and comms to any customer that requests these formats (and not just those who are blind and visually impaired). Once a customer is set-up to receive alternative media this will apply at an account level and so cover broadband as well as fixed line bills.

We currently offer the following formats - Audio (CD), Large Print & Braille

- Audio CD: the data on the disc is in rich format and audio files can be played on CD player, DVD player or a Computer.
- Large print: BT Reformats the bill and presents all of the key information up front at the start of the bill to make it easier for the end user.
- Braille: BT uses Grade 2 and similar to Large Print reformats and provides key information up front. BT also covers and binds the booklet to ensure the end user has a good experience.

We do not require that a customer gives us information about their disability as part of the process, but the customer can complete a [self-declaration form](#) if they want to provide details. If the obligation was extended to cover more formats (with increased cost) then we may have to put in place an application process to make sure it is targeted to appropriate customers.

In addition to our regulatory obligations good practice guidelines are already taken into consideration when we contact our social telephony base e.g. we use matt paper rather than glossy finishes, colour blindness considerations and One Voice / Plain English Accreditation.

Some guides, such as BT Basic, Protected Services Scheme, Network Controlled Calling and Priority Repair are produced in standard format but with larger print sizes e.g. 12 / 13 font to make them easier to read. Accessible PDF versions are produced for the Web for screen reader technology.

BT's [Inclusive Communications website](#) is designed with an emphasis on accessibility, to enable older or disabled customers to make the most of communication services, with information about special products and services.

This site received 'See it Right' accreditation from the RNIB and then last year it received AbilityNet's accessibility accreditation. The See it Right accessible website logo represents our commitment to best practice website accessibility.

The website doesn't use frames and has a common accessible design throughout. All graphics, pictures and graphical navigation buttons have text descriptions ('alt tags'), which are helpful for those using a screen reader and are required by internationally recognised web accessibility guidelines

*(iii) What is the experience of disabled people in terms of the ability to read and understand bills and contracts from communications providers?*

*(iv) What evidence is there of the effect of disabled peoples' experience with regard to billing and contract formats on their access to relevant communications services?*

*(v) Are there any groups of disabled people that are not adequately served by General Condition 15.9 and how might this be addressed?*

BT is not in a position to answer these questions. But the current formats we offer have been well received by customers.

*(vi) Which accessible formats should be expressly included in GC15.9?*

BT is concerned about the need to have the formats expanded. We are not experts on the range of formats available but any list will have gaps and would need updating on a regular basis. Ofcom specifically mention EasyRead in their consultation but we already use Plain English in many of our documents to make them as clear as possible for all of our customers. We regularly review our documents to keep them simple and concise.

Ofcom say in their document that the estimated cost for EasyRead could be up to £50/page and we would question whether such costs are proportionate to the benefit they would bring. EasyRead format seems more suitable for contract terms or changes rather than the bill which would be more difficult to convert. If it is the contract that needs converting and the customer has learning difficulties then it could raise questions about the customers' ability to fully understand the impact of entering into any contract.

*(vii) For fixed and mobile telephony providers, how many disabled customers currently request bills and contracts to be provided in accessible formats?*

BT current has 24k customers who receive alternative media bills, of which 92% are large print bills. This is provided at account level so if a customer has requested it for their telephone bill then it will also cover broadband.

Where a service message impacts alternative media customers, e.g. price changes, we send out large print, audio and braille communications to customers. We also produce the Update magazine in these versions that gets sent out with the phone bill.

*(viii) What are the costs of providing contracts and bills in accessible formats for fixed voice services and what might be the additional costs of providing broadband contracts and bills in accessible formats?*

### **[Redacted]**

As broadband bills are already covered under the current system then increased costs should be limited. But if there is an increase in customers asking for contracts or a requirement to offer wider comms in alternative media then it will have a cost impact.

*(ix) How are the costs on (viii) affected by the bundling of voice and broadband services and providers' ability to give customers single contracts and bills covering both?*

If a customer asks for alternative media then this is set at account level and will already cover telephony and broadband on their account. But many customers who take bundles or broadband are signed up to online billing and in such cases a customer can modify the bill to suit their own needs e.g. using screen readers. The bt.com website is designed to support accessible formats so we see no reason for any requirement to send out a paper (or alternative media) bill.

## **Extending priority fault repair to include broadband**

*(i) Which groups of disabled people depend on a broadband connection in order to communicate?*

*(ii) How large are these groups?*

*(iii) In what ways do these groups depend on a fixed broadband service?*

Recent research carried out by BT & the RNIB has shown that almost nine out of ten (87 per cent) blind and partially sighted older people in the UK have never used the internet. The report, ['Tackling Digital Exclusion - older blind and partially sighted people and the internet'](#) reveals people over 65 with sight loss are increasingly at risk from technological alienation. It reveals that the primary reason given for not being online was eyesight (82 per cent);

suggesting that the majority of blind and partially sighted older people mistakenly believe sight loss precludes the use of the internet.

The findings were discussed at a recent joint RNIB and BT event, bringing together key organisations committed to helping older people access the internet. The experts looked at how practical and psychological barriers can be tackled, with possible solutions, including local personalised and group training sessions, focused training on access technology, and specialised advice materials.

To help overcome such barriers RNIB, supported by BT has produced some helpful [materials](#) to show how blind and partially sighted people can, and do, use digital technology.

A wide variety of customers do use broadband – the UK market place is one of the most competitive in Europe and there are a range of providers to suit most customers.

**[Redacted]**

*(iv) In practice, what faults occur with fixed broadband connections and are these typically related or unrelated to an underlying fault with the fixed telephone line and how frequently do they occur?*

**[Redacted]**

The causes of a broadband fault are not always clear even when an engineer is sent out. Priority fault repair would mean the customer jumped the queue for response times but we may not get the problem fixed if it is on the customer domain or additional resource is needed. If it was clear that the problem was on the customer equipment when the fault was reported then we would not offer priority repair.

*(v) What problems (if any) do disabled people face in the event of a fault with a fixed broadband connection and what alternative means of accessing broadband and other services are practicably accessible to them?*

Not for BT to comment

*(vi) What measures do fixed broadband service providers take to repair faults identified with their service and is any priority currently accorded to certain classes of user?*

In line with the current obligations under GC15 we provide Free Priority Repair (FPFR) service on the phone line to:

- 8.3k Customers classed as Chronically Sick & Disabled (CSDP)
- 69k customers who are housebound and can't leave the house without help because of a chronic long-term illness or disability

No process has ever been set-up to specifically exclude customers with broadband so those customers who are registered for free priority fault repair will receive whether it is the phone or broadband line.

*(vii) What are the costs associated with repairing faults with fixed broadband connections? What additional costs would be associated with providing a priority repair service?*

Once a customer has been flagged as having priority fault repair then it would cover phone and broadband services on that account. We would not expect costs to increase much as a result of extending to broadband unless the safeguard of priority repair made customers more likely to take a broadband service. But if the GC15 rules are extended in other ways then costs will increase.

We have concerns if the eligibility criteria for priority repair are extended. We are especially concerned if the obligation covered all customers with a Careline as we believe this would not be appropriate. We know that Carelines are not solely provided to vulnerable customers and are given to any customer who requests one.

### **[Redacted]**

We need to make sure that priority repair is targeted at those customers with a genuine need to jump the queue. The pressures on the service will continue to increase and we know that the ageing population and government initiatives are increasingly reliant on the phone line to support new services.

- Ageing UK population - nearly 10 million people in the UK are over 65, population projections show increase to 15.5 million in next 20 years
  - By 2015 additional 500k people will be aged 60 – 74 & an additional 500k 75+
- Growth of Telecare and Telehealth services
- Budget constraints across Government Dept's forcing them to look at alternative methods of care via telecoms technologies e.g. the 3millionlives initiative

*(viii) What are the financial and other benefits for disabled people associated with providing a priority repair service for faults with fixed broadband services?*

*(ix) Are there any specific issues that stakeholders think it would be helpful for us to consider in relation to mobile broadband connections?*

Not for BT to comment

### **Safeguard scheme for disabled users: third party bill management**

*(i) Which groups of disabled people would benefit from the ability to nominate a third party to manage their bills?*

*(ii) How large are these groups?*

*(iii) In what ways do these groups depend on telephony and broadband services?*

*(iv) What problems (if any) do disabled people face in managing their bills and with what consequences?*

Not for BT to comment on these questions

*(v) What measures do fixed and mobile voice and broadband providers currently provide to disabled customers in terms of enabling a third party nominee to manage their account?*

BT currently offers a Protected Services Scheme (PSS). A customer / their representative must complete an application form and nominate a third party but there are no restrictions on eligibility.

**[Redacted]**

*(vi) How many disabled people currently take advantage of this provision?*

We currently have 43.9k customers registered for our Protected Services Scheme.

*(vii) What costs do fixed and mobile providers currently incur in providing access to disabled customers to a safeguard scheme?*

**[Redacted]**

The customer can ask for their bill to go to a third party but we do not send a bill to both the customer and the third party. If we had to send out a copy bill then this would increase costs

*(viii) What other barriers (if any) may exist to prevent the operation of such a scheme?*

BT allows any customer who needs it to go onto our Protected Services Scheme but if the obligations are extended then we may need to review our processes and introduce eligibility criteria with a Doctor or Consultant authorisation (and official stamp). We will also need to have regular checks to keep the third party contact up to date and get explicit consent to send the customer's bill to a third party.

We would need a new process to revoke the third party from being copied into the bill when this changed.

*(ix) What would be the benefits to relevant disabled people of the possible changes to the scheme?*

We believe that our current scheme provides a good level of protection for customers while keeping the process simple and efficient. We are not sure that changes to the scheme would benefit customers as it may lead to tighter controls being imposed.

*(x) How could such a scheme best be publicised?*

We already cover our products and services in targeted publications such as "[Including You: BT's guide to help you communicate](#)", at events/exhibitions and at our Try Before you Buy centres. We have an [accessibility section](#) on bt.com which contains information that can help customers with a range of disabilities.

### **Safeguard scheme for disabled users: third party fault notification**

*(i) What problems (if any) do disabled people face in personally notifying communications providers of faults in their services, and with what consequences?*

*(ii) What would be the benefits to relevant disabled people of the possible changes to allow third-party fault notification?*

Not for BT to comment

*(iii) Do Communications Providers currently allow third parties to report faults with a disabled customer's service? If so, on what terms? If not, are there any particular reasons why?*

We allow any third party to report a fault by calling 151 or on the BT website under the "report a fault" link. Whoever reports the fault must have the relevant telephone number. But we will then need to speak to the customer to arrange access to the premises. There is no process for allowing a third party to manage that fault on behalf of the customer.

*(iv) What barriers (if any) are there to implementing such a system of third party fault notification?*

In accordance with Data Protection rules we need to make sure that we are speaking to the customer, or someone acting with their authority, when we are discussing their account. One specific issue for faults is that if an engineer needs to visit the property we need to check with the customer that someone will be available on the date of the visit.

To allow third party fault management we would need to set up an application process similar to the one we use for Protected Services where the customer gives the named contact and provides their consent. If the scheme was linked to certain disabilities then we would need a medical professional to certify (and stamp) the form. The third party details would need to be logged on the account so that repair advisors had the right details.

We would need to make the customer aware that they had a duty to keep the third party contact details up to date and tell us about any changes – especially if mobile numbers were given. It could be difficult for a customer to say in advance who will be around to help at the time of any fault – a family member may be the contact but they could, for example, be on holiday at that time.

We are interested on why Ofcom specifically mention Telecare as trusted third parties. We know that they run and monitor Carelines but there are 200+ Telecare providers / monitoring centres and they are commercial organisations. We have already mentioned that Carelines are provided to anybody who wants one – you do not have to be vulnerable and Telecare has diversified to cover other areas, such as victim support, crime prevention and lone worker monitoring. A Telecare company could already contact us via our fault repair centre to advise if a fault was identified on their system. We could then test the line but if we needed further information then we would need to contact the customer.

*(v) What additional costs (if any) would Communications Providers incur to implement a third party fault notification system?*

Setting up a process to capture third party details and customer consent would cost money. We would also need to link to front end systems with contact details of the third party – this has implementation costs and timescales. We would need to securely store the forms and be able to retrieve if needed.

We are not convinced that the benefits to customers would outweigh the costs and barriers on having an end to end process for third party fault management.

### **A duty on Communications Providers to regularly inform disabled subscribers of details of products and services suitable for them**

*(i) What measures do fixed and mobile Communications Providers take at present to inform disabled customers of the products and services suitable for them?*

As mentioned in previous questions we already provide a wide range of information under the [Including You](#) website and from work done with external groups by our BT Inclusion Team

- BT's Including You website is designed with an emphasis on accessibility, to enable older or disabled customers to make the most of communication services, with information about special products and services.
- We send out Connections / Consumer News publications with information on new products and services that may be of interest.
- The BT Inclusion team attend Events and Exhibitions to discuss ways that BT can help customers with disabilities
- The MyDonate website gained AbilityNet Accreditation as an easy-to-use website and shows a commitment to AbilityNet's best practice after certification.
- Communications Solutions (and other) publications
- Try before You Buy Centres (199) across key organisations
  - Our Try Before You Buy centres are a national network of places where you can try out our phone equipment to make sure what you want is suitable for your needs.
  - By working in partnership with third-party Try Before You Buy centres, we have nearly 200 locations where you can see, handle and try out our equipment without being pressurised by sales people.
  - The Centres are set up in disabled living centres or within organisations helping people with particular impairments, so you also get the expertise of professionals working in these centres.

*(ii) What barriers (if any) do disabled people currently face when trying to purchase communications products and services and with what effects?*

*(iii) What additional costs would fixed and mobile Communications Providers anticipate incurring in order to comply with such a provision?*

We believe that the current methods we use to get information to customers are the most appropriate ways. We are not always aware when a customer has a disability and while the customer can provide this data we would not want this to be mandated.

The website can be used by our advisors if they are asked about products and services but our contact centre advisors are not experts on all disabilities and would not be in a position to go through the detail of all products. We constantly review the training and information

given to advisors about our Inclusive products and services and will continue to make sure our customers are given accurate information that is specific to their needs.

We do not automatically capture information on disabilities, so while we could send direct marketing comms to customers registered for current inclusive services this would not always identify whether the customer had a disability and we would need to make assumptions on what content would be relevant.

**[Redacted]**

Customers can buy phones and equipment from a wide range of retail and online outlets. Customers buying online from BT can access the Including You website to get information on the product in question. But it is not clear how this would cover retail outlets and what information they would need to provide. If the retailer is not linked to a comms provider then it seems they will not have any responsibility to give advice to the customer.

*(iv) What would be the qualitative and quantitative benefits of such a provision for disabled people?*

*(v) Are there other organisations that could usefully play a role in providing disabled people with information on the products and services suitable for them? How might such organisations and fixed and mobile Communication Providers work together to ensure disabled people have access to this information?*

We already work with a number of organisations to reach vulnerable customers and we believe that it is far more effective to engage the organisations vulnerable customers trust e.g. Social Services / Healthcare Professionals who can advise their clients.