

Cover sheet for response to an Ofcom consultation

BASIC DETAILS

Consultation title: Improving access to electronic communication services for disabled people

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Name of respondent: Ross Trotter

Representing (self or organisation/s): National Association of Deafened People (NADP)

Address (if not received by email):

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Name Ross Trotter

Signed (if hard copy)

Improving access to electronic communication services for disabled people – call for inputs

1. The National Association of Deafened People (NADP) welcomes the opportunity to respond to the call for inputs on improving access to electronic communication services for disabled people. NADP is a national support and campaigning organisation for people with a hearing loss who use spoken and written language for communication. In this response we will therefore concentrate on issues that are relevant to those people. We will respond to each of the areas for improvement set out in the document and then add a further comment on other parts of General Condition 15. We would first like to say that we warmly welcome this development and fully agree that areas of GC 15 would benefit from updating. It is essential that these provisions for disabled people keep pace with the development of technology.
2. We also welcome the proposals to extend many of the provisions to cover broadband services which we think is wholly appropriate. Even with relay services and amplified phones deafened people find using the telephone more difficult than their hearing peers and make extensive use of text services where they are on equal terms with everyone else. More and more services are being provided online and for deafened people the availability of a broadband connection is of crucial importance and they suffer greater detriment if that connection fails. We therefore support the proposals to include broadband services under GC 15.
3. **Bills and contracts in accessible formats.** While the majority of deafened people will have no problems with bills and contracts in standard formats we none the less welcome the proposal to extend the scope of GC 15.9 to include any disabled customer who would benefit from the provision of bills and contracts in accessible formats. Many deafened people are older and may have reduced vision and would therefore welcome bills in large print format or printed on paper which reduces glare. While we cannot provide statistics on how many people might be affected we would support this extension as well as the inclusion of other formats such as “Easy Read”. As stated in paragraph 2 above we also fully support the extension of GC 15.9 to cover broadband services.
4. **Priority fault repair.** We strongly support the extension of GC 15.6 to cover broadband services. As we said in paragraph 2 broadband is an essential lifeline for many deafened people and will often replace the need to make telephone calls. Most deafened people find it easier to carry out transactions online rather than make telephone calls. Many deafened people maintain contact with family and friends by using broadband services such as Skype and are therefore cut off from communication if their broadband connection fails. Email has become the communication method of choice for most deafened people. Reliable figures for the number of deafened people are difficult to come by but it is thought that there are over 800,000 severely or profoundly deaf people in the UK of

whom over 125,000 are of working age. We fully endorse Ofcom's proposals to extend GC 15.6 in this way.

5. **Third party bill management and fault notification.** The majority of deafened people are capable of living fully independent lives so these proposals will in most cases be of less relevance to deafened users. However, we do support the proposals and think they are appropriate and justified. We particularly support the extension of GC 15.7 to cover fault notification and also its extension to cover broadband services. If a deafened customer's telephone line or broadband connection fails it may be much more difficult for them to contact providers to report this. If they have only a textphone on their fixed line and that line fails they will have no means of contacting the provider at all. In such cases they would need to ask a third party to do this for them. In many cases providers will already accept notification from a third party, but there have been occasions when the Data Protection Act has been wrongly quoted as a reason for refusing calls from a third party leading to extreme frustration and stress for the deaf person. We do therefore fully support including this in GC 15.7.
6. **Information to disabled subscribers on products and services suitable for them.** We cannot improve on the way that Ofcom has set out the problems for deaf customers in paragraphs 3.61-3.63 which we completely agree with and support. The barriers that deafened people face in finding appropriate equipment are exactly those which are set out in the document, especially a lack of knowledge of staff in High Street shops. Certainly labelling and provision of regular information has the potential to reduce the detriment that is currently suffered, but more staff training is also required. We fully support Ofcom's proposals for the improvement of GC 15.10.
7. **Text calls and tariffs.** While we appreciate the changes that have been made to the General Conditions since Ofcom's statement on relay services last October, especially the introduction of the new GC 15.5 we are none the less still disappointed that the wording of GC 15.3 only mandates a special tariff scheme for telephone calls using a relay service and does not extend this to include calls between two users both using text, i.e. back to back text calls. These also take more time than an equivalent voice call because both ends need to type out the conversation but this does not seem to be recognised by the GC. It also seems to act as a disincentive to businesses having their own text based telephone numbers for deaf customers as they will not gain any benefit for the increased time such calls take. We would like to see GC 15.3 extended to cover back to back text calls.

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