

Emergency call handling agent performance - Proposed guidelines with respect to the handling of emergency calls and compliance by communication providers with General Condition 4.

Response to Ofcom's consultation

The following is Hadams Consultants Ltd response to Ofcom's consultation regarding Emergency Call Handling Agent performance. In particular compliance by communication providers with General Condition 4.

Initially we have stated a number of recommendations that we believe should be considered and implemented, this is followed by the response against the questions posed by Ofcom, with additional points following.

We exclude Level 3 from discussions here as they provide a specialist service for the railways, in particular the type of location data (including detailed access information)

We believe the UK is currently compliant in every regard with the European law requirements for provision of the emergency telephone service. Indeed, some would say that it is peerless. It is essential that any changes that follow from this consultation do not threaten this position. We consider the proposals as portrayed are safe in this regard.

Recommendations by Hadams Consultants Ltd

We put forward three recommendations for consideration.

- 1. Reduce the number of CHA providers to one (for the main 999 service – not railways).**
- 2. Introduce measurement of the answering performance of the emergency services (the second stage of the answering service).**
- 3. Strengthen links between Ofcom and the 999 Liaison Committee (owner of PECS).**

These three recommendations are discussed further in this response.

Answers to the consultation's specific questions

Question 1: Do you agree that guidance regarding the performance of emergency call handling agents is necessary?

Yes. Specifying performance standards will give both the communication providers and those managing the call handling agents a degree of certainty as to what is required. Care is required to ensure that the measurements specified are appropriate. See discussion and points raised after the answers to the basic 3 questions, below.

Question 2: Do you agree with the scope of this Consultation as set out in Section 4?

Yes. However we believe that this consultation could have adequately covered the provision of accurate and reliable caller location information. This location data is already provided to a high level of accuracy and guidance as to what is required could assist new communication providers.

Question 3: Do you agree with the guidelines as set out in Section 5? Are there any other performance standards or metrics that you think should be added?

On the whole we agree with the proposals set out in section 5. The metrics in 5.4 & 5.5 appear appropriate however we have some concern as to how they are measured. This is discussed below.

Points arising from this consultation

Number of CHAs in the UK network

There are currently two providers of CHAs in the UK (excluding the railway service)

We suggest it would be worth considering a reduction in the number of suppliers of 999/112 answering service to one. BT already provides approximately 80% of the service and with the takeover of Cable & Wireless by Vodafone an opportunity to migrate to a single supplier presents itself. Vodafone may consider that this service is not core to its business. There are a number of advantages and disadvantages for this proposal.

Disadvantages:

- A monopoly will be created in this service
- As a result closer monitoring by Ofcom maybe required
- A migration plan will be required, with attendant risk of failure

Advantages

- A standard interface (for data transfer) between BT and SP and between BT and the emergency supplier.
- Simplified communication between emergency supplier and CHA (in an administrative sense.
- A unified methodology for assessing performance
- A unified method for provision of resilience (currently the two CHAs use different methods to achieve a higher level of resilience for the 999/112 service)

On balance we believe that this proposal would contribute to an improvement in performance of the service.

Requirements of both the SP and CHA

In 5.1 it is stated that CPs satisfy themselves that CHAs deliver services to an appropriately high standard, however it is equally important the CP full fills its responsibilities to provide the calls at the correct point with all associated data.

- The consultation suggests (quite rightly) that the SP should ensure that the CHA provide an appropriate level of confidence that the required service can be maintained, particularly in the face of extreme conditions. This includes high traffic levels (both emergency and normal traffic) and infrastructure damage. However it is important to note that it is essential that the SP also provides data in a required, standard, format, and in a timely manner. In other words it is a two way responsibility.
- From this it follows that each SP must provide all the required information in a standard format and at the appropriate point, this includes data for the emergency data base. This data includes CLI, customer (subscriber) name, address (including postal code) zone code, and cell information. The data varies according to the type of customer.

Call answering performance target

Broadly we agree with the answering performance criteria, but we note that 5 seconds is, or appears to be a long time in an emergency. Most calls are answered in a much shorter time than this standard. We believe that the following two points should be considered when setting the call answering metrics.

- Answering times are based upon 95% of calls being answered within 5 seconds. However this metric must be assessed correctly. Due account should be taken of the measures taken to filter false 112 calls. In this case there is an automatic 4 second delay inserted after a 112 is dialled in order to reduce the number of false calls presented to the operator. If another digit is detected within these 4 seconds it is assumed that it is not a valid emergency call and is terminated. Hence 4 seconds have already passed after the customer has completed dialling before the call joins the operator queue. It is essential that the answer time is measured from the time the call reaches the queue, otherwise the answer time will be incorrectly elevated.
- The emergency telephone service is answered in two stages, firstly by the CHA; answering time objectively based upon the arrival time compared with the actual answering time. The customer may well judge the answering time subjectively based upon the total time for the emergency service to answer; that is stage 1 plus stage 2. The length of time taken for the emergency service to answer will impact the performance of the CHA (because the CHA operator will have to stay on the call until it is answered). Unfortunately Ofcom has no powers to enforce answering time standards upon the emergency services, even though delay at this point does impact the CHA performance. It may be beneficial (and act as a stimulant) if Ofcom required the CHA to also

return statistics on the answering performance of all the emergency services. This could be broken down as follows:

- a. Overall performance
- b. Performance for the each of the four main emergency services (Fire, Police, Ambulance, and Coastguard)
- c. Finally broken down for individual providers (for example the 43 constabularies)

We strongly recommend that the extension of answering metrics be applied to the second stage of the answering process in the interest of transparency.

PECS and the 999 Liaison Committee

The PECS code and the associated 999 Liaison Committee (that owns the code) have proved to be an excellent tool to help maintain a first class emergency telephone service. We recommend that Ofcom maintains and preferably strengthens its links with this committee.

Contact details

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