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What do you want Ofcom to keep confidential?:

Keep nothing 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:

Yes

Additional comments:

Ofcom Annual Plan 2012/13 Consultation

Response from Sorenson Communications, Inc.
February 2012

1. Sorenson Communications, Inc. (Sorenson) is grateful for the opportunity to respond to the

Ofcom Draft Annual Plan 2012/13 Consultation (Annual Plan)

2. Founded in 2000, Sorenson is a leading developer and provider of telecommunications technology for Deaf people in the United States. Sorenson has particular expertise in providing Video Relay Services (VRS), which enable Deaf Sign Language users to conduct video relay conversations with hearing people through a qualified sign language interpreter. VRS is a proven technology and has been operating successfully in the United States for several years. We believe that the introduction of a VR service which is universally available, 24 hours a day, 7 days a week, in the UK is long overdue.

Helping communications markets work for consumers

3. We welcome Ofcom's Strategic Purpose 3 to 'help communications markets work for consumers', in particular, with regards to ensuring 'the adequate provision of services for consumers with hearing impairments'.

4. We welcomed Ofcom's consultation on relay services in July 2011, which proposed the introduction of a VR service, although we have significant concerns regarding the limitations that Ofcom has suggested. A restricted Video Relay service would fall short of fulfilling the UK's legal obligations under the EU Framework. If Deaf end-users are truly to enjoy the same usability of basic telephony services as hearing users (as mandated by the EU Framework) they must be given access to a 24/7 unrestricted service that allows them real choice and flexibility.

5. Communications services are now more vital than ever in enabling people to engage fully within society. Without equivalent access to telecommunications, Deaf people will never have access to the services, information and opportunities necessary to allow them to fulfil their potential and to participate fully in today's communications-based economy and society. It is vital to introduce an unrestricted Video Relay service that will allow Deaf people to more fully participate in economic, social, cultural and political life, bringing significant benefits to the Deaf community and society at large.

6. We are pleased to see in paragraph 5.36 that Ofcom intends to publish a further document setting out next steps in early 2012, which will then be taken forward in 2012/13. However, we are concerned that Ofcom does not see the urgency to introduce universally available VRS in the UK.

7. Since 2004 Ofcom has issued over 10 consultations and statements regarding relay services in the UK. We believe that in 2012/13, Ofcom needs to take action to make VRS a reality, rather than continuing to consult on a policy that would revolutionise the lives of the Deaf community.

8. As Ofcom itself states in its recent consultation 'Review of Relay Services' "TR does not adequately meet the needs of British Sign Language (BSL) users, particularly for those who do not have English as their first language. Severely and profoundly deaf BSL users identified VR as being the most useful service to them in comparison to other TR services."

9. Furthermore, as the independent Europe Economics report shows:

- Over ten years, VRS would create a net benefit to the UK economy of between £260m and £550m

- A competitive market for VRS would create over 2,500 new jobs for Deaf people, BSL interpreters, and for the wider UK workforce
- The introduction of universal VRS would yield over £6.4m to HM Treasury through reductions in welfare spending and increases in tax revenues
- VRS is 4x faster than Text Relay and allows BSL users to communicate in their first language

10. We look forward to Ofcom's response to the Review of Relay Services consultation alongside a further consultation on Video Relay Services, which we hope will help to set a clearer timeline for the introduction of a universal VR service in the UK without the need for any subsequent consultation or delay.

11. Support for a universal VR service to be introduced in the UK in a timely fashion is also supported by Ed Vaizey MP, the Minister for Telecommunications, who made the following comments most recently in a debate in Parliament.

At the moment, the Department has an e-inclusion accessibility forum, which I have been closely involved with since I became a Minister. The forum works with charities to ensure that people in a digital age have access to the internet and to phone technology, but I have been struck by the lack of engagement from business and telecoms companies, which is unbelievably frustrating. In that respect, we would, for example, like to have video technology that enables deaf people to use sign language, and I have told all the telecoms operators, "Please come to me with a cost-effective solution," but they have not done that. Eventually, of course, I will have to regulate through Ofcom to make them do that, but it would be so much simpler if they came to me and did it.

12. As the telecommunications regulator, we believe that Ofcom has a role to play in bringing together the telecommunications industry with the Deaf community to find a suitable funding solution to introduce a VR service in the UK and we would welcome any effort by Ofcom to facilitate discussions between the telecommunications industry and the Deaf community in the coming months. We believe that including VRS as a priority issue in Ofcom's Annual Plan for 2012/13 would provide the necessary impetus to bring all relevant stakeholders to the table.

Conclusion

13. For the reasons set out above, we urge Ofcom to make the introduction of a universal VR service in the UK an explicit priority in their 2012/13 Annual Plan. The introduction of such a service already has support from the Deaf community, as well as from the Minister for Telecommunications, Ed Vaizey MP. Through introducing a VR service in the UK, Ofcom will be revolutionising the lives of Deaf people across the country.

14. Furthermore, creating a competitive market for universal VRS in the UK would promote effective and sustainable competition, help communications markets work for consumers and would bring the UK into compliance with the regulatory duties arising from the European Electronic Communications Framework which came into effect in May 2011.