Review of Relay Services – Ofcom consultation
Response from UK Council on Deafness. (UKCoD)

Introduction

UKCoD is the umbrella body for voluntary and professional organisations working in the field of deafness in the UK. The Council seeks to work with its eclectic membership to provide a comprehensive profile of deaf issues, priorities and opinion to inform and influence Government and policy makers. UKCoD welcomes the opportunity to respond to the Ofcom consultation on the Review of Relay Services In this response the word "deaf" will be used to cover the complete range of hearing loss unless otherwise specified.

UKCoD has agreed the following as being the principles required of any functionally equivalent relay service for deaf users:

- Be real time equivalent, to allow conversation at normal speeds;
- Available 24 hours a day and every day of the year.
- Meet the varying communication needs of deaf people, whether deaf with speech, BSL users, hard of hearing, deafblind or deafened, therefore treat Text Relay, Video Relay and Captioned Telephony with equal importance;
- Ensure consumers should have a real choice between providers through open competition;
- Be available to users at no additional cost to standard charges.

Question 1: Do you agree that NGTR would provide greater equivalence than the existing approved TR service?

Potentially but not unless relay assistants are able to increase the rate at which they relay the speech of a hearing person (See below). UKCoD welcomes the recognition by Ofcom that the current Text Relay service does not provide functional equivalence. NGTR has the potential to improve this, it is however it is untried and untested, and critically we are seeking assurances that the speed issue (see below) will be resolved. It would be useful to have specified timescales for the improvements.

We look forward to introduction of improvements that allow for natural interruptions in the conversation and the use of computers for voice/text calls.

We have concerns about the way the way in which conversation speeds have been calculated in the consultation (section 4.23). The report assumes that NGTR will still continue to use Relay Assistants who type what the hearing person is saying and that this will be at about 60 wpm. This is no different to a text user who is using VCO with the current system of Text Relay.

A more natural conversation speed can only be attained if the Relay Assistant is able to increase the rate at which they relay what the hearing

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person is saying to the deaf user so this figure s the most crucial. Therefore speeds closer to standard voice calls of 170 wpm, should be target. This is likely to require introduction of operators who use voice recognition systems, to replace the use of keyboard based systems, otherwise speeds are unlikely to exceed 60 wpm.

Whilst the development of additional functionality such as the ability to interrupt will be welcomed by many users, it should be also recognised that this may create additional difficulties for some categories of user.

However, if recognised and appropriately accommodated, UKCoD would hope that the development of additional functionality would incorporate sensitive customisation to allow service modification and reflect the needs of individual users

Captioned telephony function would be of potential benefit to large numbers of deaf people with intelligible speech, and reduce the level of involvement of the operator.

We would welcome the change from using prefix numbers to the use of 'real' phone numbers.

We would welcome a confirmation of an intention to introduce the use of VoIP services

Question 2: Do you agree with the proposal to implement NGTR through the amendment to GC15? Do you agree that the criteria we propose satisfactorily embody improvements we suggest for NGTR?

UKCoD believes that neither amendments to GC15 or the USO route would promote an effective and sustainable solution for NGTR, as both are likely to suppress a competitive edge to service evolution.

UKCoD welcomes the fact that the GC15 approach allows Ofcom to place obligations for an improved relay service on all telephone service providers.

UKCoD also believes for the service to become truly equivalent and evolving there is a need to introduce real choice to ensure the market develops an energy for self improvement, based on normal market and competitive forces.

UKCoD would be supportive of a voluntary fund based approach, rather than a regulatory approach.

UKCoD would welcome a reassurance that equipment compatible with the NGTR is affordable and an appropriate support service is available during the period of transition.

The range of KPIs and service standards need to be robust, under constant review and reflect the potential technological and service developments that will improve the service. Critical KPI's would be those that relate to speed and accuracy of service.

UKCoD members would be willing to assist with the development of KPIs and service standards.

Question 3: Do you agree that a period of up to 18 months for implementation of NGTR, following an Ofcom statement, is appropriate?

UKCoD would welcome the introduction of NGTR within 18 months, ideally, much sooner, 12 months.

Deaf users have been forced to put up with an outdated and inequitable service for far too long, and therefore we would wish to see NGTR introduced as soon as possible, and would therefore prefer that implementation was in 12 months.

We believe the required technology is available and service continuity can be maintained in those time scales.

Question 4: Do you consider that the requirement to ensure equivalent services for disabled people would require a mandated VR. service in some form for BSL users?

Yes, UKCoD believes that the mandating of video relay is the only possible way of achieving equivalence in use of the telephone network both for those deaf people whose first or preferred language is BSL.

The recognition that the provision of video relay services is the only way that equivalence can truly be achieved is an important development in use of the telephone for BSL user.

Questions 5-7 Do you agree that a restricted service would be more proportionate in providing equivalence for BSL users than an unrestricted service? Provide your views on methods 1-5. Do you agree that a monthly allocation of minutes combined with a weekday/business hours service would be the most appropriate means to restricting the service?

UKCoD set out at the start of this response the principles that are necessary to achieve equivalence in use of the telephone network for deaf people. A restricted service would contradict these principles and therefore is not supported.

UKCoD is supportive of a 24/7/365 service and that this is the minimum requirement.

UKCoD recognises that there would be a period of market piloting and testing before full roll out.

UKCoD recommend the establishment of a continuing service user reference group to support OFCOM in developing appropriate service provision, customised to address the varying needs of service users.

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