Title:

Prof

Forename:

Jim

Surname:

Kyle

Representing:

Organisation

Organisation (if applicable):

REACH112

Additional comments:

I am writing to you on behalf of the REACH112 UK consortium. REACH112 is a project part funded by the European Commission as a pilot programme to test the concept of Total Conversation (video, voice and text) in telecommunications. We are required by Brussels to test out person to person calling, relay services (in sign language, in text and in speech) for a wide range of disabled users and in particular to demonstrate equivalent access to 999/112 services. Work on this project began in 2009 and the testing of 999 access begins in May 2011. The partners in this consortium are Avon and Somerset Police, Avon Fire and Rescue, RNID, Aupix and University of Bristol.
REACH112 is testing the concept of equivalence and will generate data which will be of value to you in these developments. It will report finally in 2012.

Question 1: Do you agree with our proposed approach to definitions?:

Question 2: Do you agree with our proposal to add CEPT to the list of standardisation bodies?:

Question 3: Do you agree with our proposals to extend the requirements of GC3 beyond ?fixed locations? and to require CPs to ?take all necessary measures? to maintain their networks and services and access to emergency services?:

Question 4: Do you agree with our proposals for emergency call numbers - which includes amending the definition of CP and requiring that location information is provided free of charge, as soon as the call reaches the emergency organisations and is accurate and reliable (in line with our proposed high level criteria)?:

Question 5: Do you agree with our proposed approach to contract related requirements relating to the provision of additional information, the length of contracts and the conditions for termination?:

Question 6: Do you agree with our proposals to ensure equivalent access to the emergency services for disabled users and to mandate the provision of Emergency SMS?:

In general
Despite welcoming the existence and promotion of emergency SMS, we are very concerned that it should be presented as "helping to promote equivalence for disabled end users." It is also worrying that it should appear to be presented to CPs as "the requirement for equivalence". It is not an equivalent service.

Deaf/disabled take-up of the service
We have discussed with many Deaf people as part of our work and are not finding awareness of the e-SMS service. It seems likely that of the 18000 or so registered users, many are not disabled users and as such the impact of e-SMS on the lives of disabled people is hard to determine. As far as we can tell, from our emergency service partners, also there has been minimal impact on them.

Issues with e-SMS
We recognize the points made in favour of the use of e-SMS. We agree that such services are of value as part of the provision. We know that there have been reports of favourable responses for deaf people using eSMS and as such the scheme is a useful one, but it is not an equivalent one.
We also note your own reservations. We would like to add that not only is the service non-immediate, it is non-reassuring. When asked in research on behalf of the Scottish Executive in 2005, Deaf sign language users indicated that sms was not acceptable in an emergency situation because the texter was always uncertain of the response as there was no personal contact.
This concern is supported by the e-SMS service itself which advises that users seek alternative methods of contacting the Emergency services until confirmation is given that their call is being dealt with; with a time lag of 2 minutes between texts this can cause confusion and uncertainty.
It is also the case that the delay created by the text dialogue is unacceptable in severe emergency. Our colleagues in the Fire Service point out that in a recent call, they arrived at a fire within 7 minutes but this was still not fast enough to save two children's lives. Any additional delay does not provide equivalence.

Issue of equivalence
We understand the pressure on OfCom to find a simple solution but we do not believe that it is possible to be "as equivalent as possible" or to be "far more equivalent" - it is either equivalent or it is not.

We re-iterate that e-SMS is a useful service but consider that it must not be presented as the target for CPs. There are other methods available to provide far better communications for disabled people and as such we do not agree that this service gives customers " as equivalent access as is currently possible.

Direct access
If we are to aspire to equivalence in telecommunications, then service access must be direct - as it is for non-disabled people. It is relatively easy to create a direct IP Total Conversation link to the emergency services call centres (in order that users are able to reach the service directly ie face to face with the call-taker) - even in the case of a Deaf sign language user, the call taker will be able to see the nature of the problem, respond and then invoke the interpreter or appropriate relay service in order to communicate with the caller. This removes the delay factor of interposing a service between the caller and the BT call handler. It also increases the effectiveness of the despatch (ie correct service) and increases the richness of instruction to the emergency service personnel who are on the way, because the call taker can actually see what is happening in the incident.

Proportionality
At the same time the question of proportionality is much used in this regard. This appears to be applied in terms of numbers of users instead of in terms of the value of life and OfCom's own quoted cost of fatality. Proportionate needs to be interpreted in terms of cost to society and to lives in the case of fatality or severe injury, and not in terms of commercial cost-drivers based simply on numbers of users.

We propose that Total Conversation implementation is much closer to equivalence as it is open to all, disabled and non-disabled (something already recognised by the 999 Liaison committee). Total Conversation is already available free on smartphones (offering real time text communication in remote areas of poor reception, when video might not be possible) and is also free to download on any PC device.

We agree that emergency SMS ought to be preserved but it must not be the end target for CPs. We support the suggestion to make the scheme compulsory; however, we also support the notion that this compulsory step has to be only the first step in exploring and supporting new technologies, particularly when recognizing the advances made in mobile smartphones with the function and ability to use Total Conversation - which opens up a new world for the hard of hearing and deaf communities particularly. These innovations will allow the emergency service providers to reach out to all end user communities which will in turn satisfy equality and diversity criteria for the 999 service.

Roaming
When abroad we consider it unlikely that users will purchase a new sim card on the off-chance that they might need to call an emergency text number - especially when the response is not guaranteed in their native language.
REACH112 has already demonstrated roaming on 3G and GSM networks from other countries ie while abroad using a UK sim. This is in fact the only way to do it is only by reference back to home country that the language of the user can be recognised. We have also already demonstrated inter-operability with services in other countries

e-SMS as default
We consider it unlikely that users will view a service such as e-SMS as a default. The obvious default is to call 999 by voice and to attempt to speak (almost all deaf children are taught to do this). In a call with even the poorest quality Deaf speech, an emergency can be detected by an experienced call taker.
This is of course, greatly enhanced by the use of Total Conversation, where the call taker can

actually see the user and activate the despatch of help at the same time as invoking the relay service. We see a danger in mandating a non-equivalent service when there are demonstrably better, ubiquitous solutions, already being proposed by the European Commission and being tested in the UK.

In summary

We agree that e-SMS has value.

We are concerned that CPs will adopt this cheap option because OfCom has said it is the requirement for equivalence.

We are concerned that it delays the consideration of markedly more appropriate and proportionate services, which can be used by all - not just by disabled users.

We recognise the complexity of the current 999 call centres, their software and procedures - after all, REACH112 includes these services in our partnership.

We urge OfCom to be much more positive in its commitment to Total Conversation, which is available at the present time, to all users (disabled and non-disabled).

In this latter regard, we encourage OfCom to broaden its next stage consultation to embrace access for all and by doing so, to promote a response proportionate to all users and which enhances the management of incidents by giving call takers the sight of the incidents as well as voice reports.

Question 7: Do you agree that given the existing measures that are in place to help disabled users to access 116XXX services, it is not necessary to make further changes to GC15 in this respect?:

Our response to this question is more or less the same as the response to Q6. We consider that appropriate access to these services is gained from the use of Total Conversation.

We have been in discussions with Samaritans concerning this implementation and consider that it would be a significant enhancement to a telephony consultation if the counsellor is able to see the caller and vice versa.

Therefore we urge you not to accept the status quo as an appropriate response.

Question 8: Do you agree with our proposals on conditions for transferring the rights of use of telephone numbers and also for granting their use for a limited period of time?:

Question 9: Do you agree with our proposals on the one working day requirement in relation to bulk mobile ports and in relation to fixed porting? If not, please explain why?:

Question 10: Do you agree with our proposed approach to the porting compensation scheme requirement?:

Question 11: Do you agree with our proposed approach on requirements relating to ensuring access to all numbers within the Community, the charging of ETNS numbers and calling the hotline for missing children on 116000?:

Question 12: Do you agree with the proposed obligation on universal service providers to notify us when they are disposing of part or all their local access network assets?: