

## **Cover sheet for response to an Ofcom consultation**

## BASIC DETAILS

Consultation title: **OFCOM CONSULTATION ON DRAFT ANNUAL PLAN 2011/12**

To (Ofcom contact): Ed Leighton

Name of respondent: Damian Barry

Representing (self or organisation/s): DAART

Address (if not received by email):

## CONFIDENTIALITY

Please tick below what part of your response you consider is confidential, giving your reasons why

Nothing	<input checked="" type="checkbox"/>	Name/contact details/job title	<input type="checkbox"/>
Whole response	<input type="checkbox"/>	Organisation	<input type="checkbox"/>
Part of the response	<input type="checkbox"/>	If there is no separate annex, which parts?	

If you want part of your response, your name or your organisation not to be published, can Ofcom still publish a reference to the contents of your response (including, for any confidential parts, a general summary that does not disclose the specific information or enable you to be identified)?

## DECLARATION

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Ofcom seeks to publish responses on receipt. If your response is non-confidential (in whole or in part), and you would prefer us to publish your response only once the consultation has ended, please tick here.

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Name Damian Barry

Signed (if hard copy)



## **OFCOM CONSULTATION ON DRAFT ANNUAL PLAN 2011/12 DAART RESPONSE**

### ***Introduction***

DAART Campaign is a campaigning group of individual consumers who may or may not have any representation with deaf or hard of hearing organisations and would like to add their voice to see alternative relay services available here in the UK.

Our interest centres primarily to campaign to ensure there are accessible telecommunication relay services 24/7/365 and believe a telecommunication relay fund where all telecoms providers contribute a percentage of their revenues into a fund to support the provision of all relay services.

### ***Ensure the adequate provision of services for consumers with hearing impairments (6.29)***

We believe that it is now time for Ofcom to pave the way for improved relay services as a priority.

We believe that Ofcom should encourage choice, competition, choice of platform and technological development as against the current situation with one supplier with no pressure to develop either technology or procedures. We understand there are EU /UK legal implications that may prevent the full transposition of the EU Directive due to the proportionality test. DAART hopes Ofcom enters into the

spirit of having a full range of relay services allowing consumers to have choice and functional equivalent access that our hearing peers have access to.

DAART along with Hearing Link carried out an exercise to estimate the potential take up of relay services and this was passed to Ofcom for their consideration. DAART would be disappointed if the current thinking persists that there would be runaway costs based on inaccurate data and concern about potential fraudulent activity.

### ***Promoting the availability of easily-usable apparatus (6.43 & 6.44)***

We are encouraged by the obligation to “encourage the availability of terminal equipment offering the necessary services and functions in order to be able to adopt and implement specific arrangements for disabled end users” may be viable however DAART believes that it may be necessary to make this provision mandatory and that all equipment are inter-operable with all providers maintaining choice.

### ***Representation of older and disabled consumers (6.66 & 6.67)***

However, in the short term, we are encouraged by the plan to continue “to promote the usability and accessibility of consumer equipment.” (6.67 ).

Many mobile phones that have compatible accessible features are usually more expensive than usual mainstream phones. DAART believes that accessible phones should be part of the mainstream since the older person represents a significant share of the mobile market.

In addition there should be inter-operable features that allow disabled users to access relay services through their mobile phone of their choice.

We would like to see Ofcom play a part in persuading manufacturers to integrate accessibility features as part of the norm to reflect this older person market and ensure inter-operability for relay services for disabled consumers

DAART