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people

OFCOM CONSULTATION ON DRAFT ANNUAL PLAN 2011/12 HEARING LINK TELECOMMUNICATIONS WORKING GROUP RESPONSE

Introduction

Hearing Link is a membership organisation with the aim of enabling people with acquired hearing loss to participate fully in society. It is estimated that there are, of the order of, 9 million hearing impaired people in the UK with, in addition, an extensive network of families, friends and work/education colleagues. People with acquired hearing loss include those in the early stages of losing their hearing, hearing aid users through to those with a profound hearing loss. It covers all age groups although many will be older. In this note, we use the term "deaf" to cover the wide range of people.

In the context of telecommunications, most of these people communicate using speech and residual hearing, although, for the more severely affected people, other forms of support will be required. Functionally equivalent access to telecommunications at equivalent cost is vital for hearing impaired people.

The Telecommunications Working Group of Hearing Link deals with access to telecommunications for people with acquired hearing loss and we welcome the opportunity to respond to the consultation.

Our interest centres primarily on the on-going work related to older and disabled people and the hearing impaired in particular. Our comments are listed below under the headings used in the draft annual plan.

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

The two Ofcom reports on relay services (Plum Consulting 2009 ¹ & Opinion Leader 2011 ²) essentially support what the deaf community have been saying for at least five years. We believe that it is now time for Ofcom to pave the way for improved relay services as a priority.

We recognise that there are legal issues (both UK and EC) to be addressed but express no preferences here. The main aim should be provision that encourages 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. The current BT Text Relay service is outdated and does not provide functional equivalence. We should be disappointed if Ofcom spent undue time seeking changes rather than using their energy to facilitate improved relay services such as captioned telephony and video relay. We also recognise that the cost of improved relay provision is an important issue. However, we are concerned that it would be all too easy to over-estimate the number of people likely to take up improved relay services and result in unduly high estimates of cost. Estimates based on the number of deaf people who might benefit and on take-up in other countries with different conditions may well be flawed. Our own estimates suggest that take-up could well be much lower than at first expected. In addition, we believe that a requirement for pre-registration based on need (necessary anyhow for internet based services) will result in significantly reduced take-up as well as minimising fraudulent use. In addition, we believe that many hearing impaired people would accept other restrictions on a temporary basis to allow the system to settle and provide objective data on long term take-up. Finally there are already video relay services available in the UK (at full cost) and a captioned telephony service (again at full cost) will be available in April 2011. The first step towards improved relay provision has, therefore, already been made and the UK could move on quickly given the will to succeed.

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" (6.43) but disagree with the BIS opinion that this is discharged through duties under section 10 and the BIS e-accessibility forum (6.44). We have already stated to BIS (in our response to their consultation ³) that encouragement (via the e-accessibility forum) may be viable but enforcement may be the only viable option in some cases.

One concern is in regard to terminal equipment for some deaf-blind users who will have significant problems of access and may need special help. However, we are sure that the relevant deaf-blind organisations will highlight the specific technological issues.

The other concern is mobile and cordless phone accessibility for hearing aid users. Currently UK consumers rely greatly on US (FCC) requirements to influence manufacturers that also supply the UK market. We should like to see UK/EC moves towards proportionate availability of mainstream mobile and cordless phones that are suitable for hearing aid users - using EC agreed methods of testing if necessary.

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). Whilst there are a number of mobile phones designed specifically for older and disabled people that also work well with hearing aids, these tend to be more expensive than equivalent mainstream phones and many hearing impaired people (especially younger ones) would prefer to use mainstream equipment if at all possible. An illustrative young person's response is “A flip-phone! No way”.

The issue then, is for the hearing aid user to locate a compatible phone amongst the many mainstream phones available.

We are pleased to be working with Ofcom staff to highlight the value of the Global Accessibility Reporting Initiative (GARI) database of accessible mobile phones and to encourage the Mobile Manufacturers Forum to publish more detailed Hearing Aid Compatibility(HAC) data (M & T ratings) for European regions as they do for the United States. We realise that there are compatibility issues but argue that most UK users would be happy to use US (FCC) ratings to start a phone finding process that has to end with personal testing. We should also like to see Ofcom staff given support to persuade the manufacturers and suppliers of cordless phones to embark on a similar exercise to the GARI database.

1. Voice telephony services for deaf people. Plum Consulting, June 2009.
2. Ofcom Relay Services, Opinion Leader, February 2011.
3. BIS Consultation on implementing the revised EU electronic communications framework, December 2010.