

Cover sheet for response to an Ofcom consultation

BASIC DETAILS

Consultation title: Tackling abandoned and silent calls

To (Ofcom contact): Matthew Chapman

Name of respondent: Ross Trotter

Representing (self or organisation/s): TAG

Address (if not received by email):

CONFIDENTIALITY

What do you want Ofcom to keep confidential?

Nothing

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DECLARATION

I confirm that the correspondence supplied with this cover sheet is a formal consultation response. It can be published in full on Ofcom's website, unless otherwise specified on this cover sheet, and I authorise Ofcom to make use of the information in this response to meet its legal requirements. If I have sent my response by email, Ofcom can disregard any standard e-mail text about not disclosing email contents and attachments.

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Name Ross Trotter

Signed (if hard copy)

Tackling Abandoned and Silent Calls – Ofcom consultation Response from TAG

1. TAG welcomes the opportunity to respond to the Ofcom consultation on Tackling Abandoned and Silent Calls. As a consortium of the full range of national and regional organisations in the UK working on behalf of deaf people, TAG promotes equality of access to electronic communications, including telecommunications and broadcasting, for deaf, deafened, hard-of-hearing, deafblind people and sign language users. In this response the word “deaf” will be used to cover the complete range of hearing loss unless otherwise specified.
2. TAG welcomes Ofcom’s efforts to reduce the problems and harm caused to consumers by abandoned and silent calls. While they are a nuisance for everybody they are particularly harmful for vulnerable users such as deaf people. Textphone users have no means of knowing whether the inability to connect to a particular call is because it is a silent or abandoned call or because it is a valid call made by a hearing person without using the prefix that will automatically bring in Text Relay. Thus they are at more risk of potential harm from such calls. They would also not hear any information messages that might be played during such calls as these do not have text equivalents. If a text user has caller display there is therefore an increased likelihood they may try to return the call to establish who it was made by, which again can carry an increased risk of harm. In short, TAG feels there is inadequate protection for textphone users in the current arrangements.
3. Hard of hearing users are also at risk of harm since they may fail to hear any information messages clearly or pick up enough of the call to realise it has been generated by automatic dialling equipment. Again the current arrangements do not adequately meet the needs of such users.
4. TAG also has concerns that the use of AMD technology, as explained in the consultation document, means that calls are likely to be abandoned if the AMD equipment disconnects the call if it believes it has been answered by an answer machine. The consultation document concentrates on occasions when this identification is false and the call has actually been answered live, but fails to recognise there is an additional problem for textphone users. It is well known that the signalling used by textphones as they attempt to connect with an incoming call is very similar to the signalling emitted by a fax machine or answer machine. Thus a text user answering a call on a textphone is likely to be wrongly identified as an answer machine by AMD equipment and therefore abandoned, leaving the textphone user uncertain what is happening.
5. TAG does not believe that any research has been carried out on what will happen if AMD equipment is used during a call to a textphone. If AMD equipment does confuse textphone signalling with answer

machine signalling it follows that such calls are always likely to be abandoned inappropriately. And since, as the consultation document makes clear, such calls are likely to be repeated, textphone users may suffer great detriment from this practice. TAG believes that Ofcom should investigate this issue as a matter of urgency.

July 2010