

## New Voice Services

### An OFCOM consultation

#### Response by RNIB (Royal National Institute of the Blind)

##### 1. Introduction

1.1 RNIB welcomes this opportunity to contribute to discussion on the regulatory framework within which new voice services such as Voice over Broadband should develop.

1.2 We are the major voluntary agency working with and on behalf of blind and partially sighted people in the UK, offering a wide range of direct and indirect services. We have always taken a close interest in telecommunications, from the early days of training blind telephonists and assessing switchboards to our current involvement in product design and development. In recent years we have, for example, worked with Vodafone on bringing to market mobile telephones with speech output. We have responded to a wide range of OFTEL and now OFCOM consultations on telecoms issues. Members of RNIB staff have served on a range of advisory committees and working groups set up by the regulator.

1.3 Full access to the Internet has also been a major concern in recent years. This has been demonstrated by our advisory and consultancy work on web design; the training we offer to blind and partially sighted people in the use of computers; and a wide range of research projects.

##### 2. Summary of concerns

2.1 We do not wish to stand in the way of true progress, nor deny the benefits which new voice services may bring. However, it is important that new applications of technology are not allowed to benefit one section of society at the expense of another.

2.2 If services such as Voice Over Broadband are to become the dominant form of voice communication in the next decade, it is imperative that protection for consumers is built in from the outset. We see no reason why the minimum levels of service currently

guaranteed through General Conditions of Entitlement should not be carried over into regulation of this new form of communication.

2.3 Access to emergency services, text relay facilities and directory enquiries are particularly important in this context.

2.4 OFCOM asserts in its summary of the consultation document that one of its aims in considering the regulatory regime for these new services is to ensure that the consumer is properly informed and protected. We see this as paramount.

2.5 It is therefore all the more regrettable that, in the press release accompanying the publication of this consultation, Stephen Carter, Chief Executive of OFCOM, is quoted as saying: "Broadband voice services are a new and emerging market. Our first task as regulator is to keep out of the way." We do not agree with this statement, which implies an abdication of the regulator's responsibility to protect consumers.

2.6 Mobile telephony was once seen as very novel, but was in due course brought within universal service and subjected to the same requirements as fixed lines. We see no need to wait as long to apply universal service obligations to Internet-based services.

### 3. Access to emergency Services

3.1 It is clear from the consultation that services such as voice over broadband might not permit full access to emergency services. We believe it would be very undesirable to allow communications services to develop in this way.

3.2 It would seem to us that employers and many service providers, such as hospitals, hostels or other residential establishments, have a duty to offer full access to emergency services as a part of their general duty of care.

3.3 They might hope to rely on mobile back up in emergency, but this is fraught with risks such as low battery levels or collapse of the network in major emergencies.

3.4 OFCOM asserts that it might be acceptable for some telecommunications service providers to offer a "lower level" of access to emergency services. It would be most worrying if this

meant the loss of a facility to locate the origin of an emergency call, especially if it was made from a terminal with a non-geographic number. Blind and other disabled people - and indeed many other people - might not be able to give a full description of where they were, especially when under stress.

3.5 Services which did offer some 999 access but which could not operate if there was a power failure would also be quite inadequate as a source of help in an emergency.

#### 4. Access to other “special” services

4.1 It has been suggested that services such as voice over broadband might not give access to directory enquiry services or to text telephony or text relay services. Again, this is very worrying.

4.2 If employers replaced conventional systems with such services, they would be denying employment opportunities to many disabled people. It would be extremely difficult for a disabled employee or applicant to use the powers of the Disability Discrimination Act, 1995, to oblige an employer to re-install a more appropriate service, since the cost could be justification for not doing so.

4.3 An employer or service provider who failed to provide minicom access would almost certainly be in breach of their obligations under anti-discrimination legislation.

4.4 Equally, we would question whether a service provider, such as a nursing home, should be permitted to remove access to the dedicated 195 directory enquiry service for disabled people unable to read a phone book.

4.5 Number portability between the Public Service Telephone Network (PSTN) and Voice Internet Protocols (VoIP) - and vice versa - would be advantageous and simplify the problems of providing some form of directory service. However caller location will be much harder to handle since IP addresses do not currently identify the user or the location.

4.6 Problems arise with text telephony in the interface between the IP and PSTN systems, as there is a lack of agreed standards in this area.

## 5. Knowing what you are using

5.1 We believe it is extremely important that services which do not offer the full range of facilities currently expected of a conventional telephone should be easily distinguishable both visually and by touch. A blind or partially sighted person on unfamiliar territory needs to know that the “phone” they are picking up is or is not “real”.

## 6. Mis-selling

6.1 Mis-selling is also a real danger. There should be stringent precautions against the selling of these services to vulnerable people who might not fully understand their implications.

## 7. Universal Service

7.1 We feel that, before any irreversible decisions are taken, this topic should be considered as part of the forthcoming review of universal service.

## 8. Conclusion

8.1 While voice over broadband and other innovations remain a supplement to existing, conventional telecommunications services, they may pose relatively little threat. However, where they become the main or sole means of communication, either in the residential or business market, they do pose considerable threats to disabled people unless obliged from the outset to meet certain universal service obligations.

8.2 We do not believe that voluntary codes of practice will be adequate in this uncharted and fast moving field.

8.3 For further information or clarification on our views, please contact in the first instance David Mann, Campaigns Officer, RNIB, tel. 028 9032 9373, e-mail [david.mann@rnib.org.uk](mailto:david.mann@rnib.org.uk)

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