

Consultation Response

Access to electronic communications services for disabled consumers (Ofcom)

17 January 2014

About us

Action on Hearing Loss is the new name for RNID. We're the charity working for a world where hearing loss doesn't limit or label people, where tinnitus is silenced – and where people value and look after their hearing.

Our response will focus on key issues that relate to people with hearing loss. Throughout this response we use the term 'people with hearing loss' to refer to people with all levels of hearing loss, including people who are profoundly deaf. We are happy for the details of this response to be made public.

Comments

Action on Hearing Loss welcomes the opportunity to comment on Ofcom's consultation regarding access to electronic communications services for disabled people. We responded to the original consultation in February 2013 and were supportive of many of the original proposals. We are therefore disappointed that some of these proposals will not be taken forward. However, it is reassuring that many of the providers already offer some of these services such as third party fault notification, third party bill management and priority repairs. We believe it is important for these proposals to be reconsidered in future, particularly as video relay services become more widely used by sign language users and therefore access to broadband will be increasingly important.

- 1. Do you agree with Ofcom's analysis and proposal to adopt Option 2 in Issue 1? Please support your response with reasons and evidence.*

We agree with Ofcom's proposal to adopt Option 2 in Issue 1. Whilst the ambiguity in the wording of General Condition 15.3 is not currently an issue, it may cause problems in the future. It is important that telecommunication providers are clear on what access they need

to provide to the relay service and at what cost, to ensure that people with hearing loss are not discriminated against. Calls through Text Relay whether to or from a person with hearing loss, must be charged at equivalent prices to calls not through the Text Relay service. If any calls through the relay service were charged at a higher price this would discourage communication with deaf people resulting in discrimination. We therefore agree that it is important to clarify the wording of this condition to ensure that calls both to and from people with hearing loss are not charged at a higher rate.

2. Do you agree with Ofcom's analysis and proposal to adopt Option 2 in Issue 2? Please support your response with reasons and evidence.

We agree with the proposal to adopt Option 2 in Issue 2, to delete General Condition 15.3 (a). There is ambiguity in the charges made for Text Relay calls and we agree that removing this condition will help to simplify the charging requirements and clarify that providers are not able to make additional charges for equivalent calls. We believe that where customers have call bundles, equivalent Text Relay calls should be included within the bundle cost.

Conclusion

Whilst we are disappointed with the decision not to take forward many of the proposals from the February 2013 consultation, we welcome the proposals to clarify General Condition 15 and believe these changes will help to prevent discrimination against people with hearing loss when making and receiving Text Relay calls.

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