

## **Access to electronic communications services for disabled people**

### **Introduction**

The National Association of Deafened People (NADP) welcomes the opportunity to respond to the consultation on the Access to electronic communications services for disabled people. NADP is a national support and campaigning organisation for people with a hearing loss who use spoken and written language for communication. In this response we will therefore concentrate on issues that are relevant to those people.

We are pleased that Ofcom is consulting on the provisions of General Condition 15, since its appropriate implementation is of great importance in achieving equivalence for deafened users. We are disappointed that it has not been possible to propose changes in areas such as access to information, priority fault repair and the use of third parties, especially extending the obligation to broadband, but we accept that at the present time there is insufficient evidence of possible detriment. We would however encourage Ofcom and providers to keep these issues under review and to do all that is possible to help deafened users to participate in electronic communication services as equally as possible.

#### **Q1. Do you agree with Ofcom's analysis and proposal to adopt Option 2 in Issue 1?**

Communication is always a two way process and therefore equivalence demands that deafened users are able both to make and to receive calls via the relay service and that hearing people making a call to a deafened person via the relay service should not incur additional charges for so doing. NADP recognises that current practice does actually follow this practice, but agrees that it is important to remove any possible ambiguity in the wording of the General Condition. NADP therefore agrees with Ofcom's analysis of the situation and the proposal to adopt Option 2 in Issue 1.

#### **Q2. Do you agree with Ofcom's analysis and proposal to adopt Option 2 in Issue 2?**

NADP agrees that the reference in the General Condition to "standard local prices" is now outdated and could lead to a user of the relay service being charged more for the call than somebody making the same call without the relay would pay. We also agree that the possibility of charging for an unsuccessful call made using the relay when a similar call made without the relay would not be charged would be discriminatory. NADP agrees that calls via the relay service should be charged in a way that is equivalent to similar calls made without the relay and whether successful or not, and that charging should be consistent across all communication providers. Any possible ambiguity that might prevent this should be removed. NADP therefore agrees with Ofcom's analysis of the situation and the proposal to adopt Option 2 in Issue 2.

January 2014