

Mr

**Forename:**

Joff

**Surname:**

Mcgill

**Representing:**

Organisation

**Organisation (if applicable):**

UKCoD

**Email:**

**What additional details do you want to keep confidential?:**

No

**If you want part of your response kept confidential, which parts?:**

**Ofcom may publish a response summary:**

Yes

**I confirm that I have read the declaration:**

Yes

**Additional comments:**

**Question 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.:**

Do you agree with Ofcom's analysis and proposal to adopt Option 2 in issue 1?

It is clear to UKCoD that equivalence can only be achieved if disabled users are able to originate and receive calls via a relay service, and that any user calling a disabled user via the relay services does not face additional charges. In other words such a call should be priced as if the call were not using relay.

UKCoD recognises that current practice means that users are able to originate and receive calls using the relay service, but it is important to remove any ambiguity, so supports the proposal to amend the general condition. UKCoD agrees with Ofcom's analysis and proposal to adopt option 2 in relation to issue 1.

**Question 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:**

Do you agree with Ofcom's analysis and proposal to adopt Option 2 in issue 2?

It is clear to UKCoD that calls via a relay service should be priced and charged in such a way that is equivalent; that is as if relay services were not used. This applies to both the rate the call is charged at and whether the call is connected / answered.

Users of relay services should not face additional charges, even if the call is not connected. Calls should be priced as if they were not a relay call. If a non-relay call was priced at a standard rate, then so should a relay call; if a non-relay call is part of an inclusive package, then so should a relay call.

It is also important that disabled users experience consistent practice across all communication providers in terms of how relay calls are priced and charged in an equivalent way.

UKCoD agrees with Ofcom's analysis and proposal to adopt option 2 in relation to issue 2.