

Your response

Question	Your response
<p>Question 1: Do you agree with our proposed changes and additions to the defined terms used in the GCs in order to align with the EECC, as set out in Annex 11?</p>	<p>Confidential? – N</p> <p>This question is not applicable to Action on Hearing Loss.</p>
<p>Question 2: Do you agree with our proposed changes to the GCs to implement Article 102, as set out at Annexes 11 and 16?</p>	<p>Confidential? – N</p> <p>This question is not applicable to Action on Hearing Loss.</p>
<p>Question 3: Do you agree with our proposed guidance in Annex 6 on our expectations for how providers should comply with the provision of contract information and the contract summary?</p>	<p>Confidential? – N</p> <p>This question is not applicable to Action on Hearing Loss.</p>
<p>Question 4: Do you agree with our proposed changes to the GCs to implement Article 103 and our proposed approach to implementing Article 104, as set out in Annex 11?</p>	<p>Confidential? – N</p> <p>This question is not applicable to Action on Hearing Loss.</p>
<p>Question 5: Do you agree with our proposed changes to the GCs to implement the requirements in Article 105, as set out in Annex 12?</p>	<p>Confidential? – N</p> <p>This question is not applicable to Action on Hearing Loss.</p>
<p>Question 6: Do you agree with our proposed changes to</p>	<p>Confidential? – N</p> <p>This question is not applicable to Action on Hearing Loss.</p>

<p>the existing guidance as summarised here and set out in Annex 7?</p>	
<p>Question 7: Do you support our proposals to introduce (a) new general switching requirements for all types of switches for residential and business customers and (b) specific switching requirements on information, consent, compensation and notice period charges for residential customers?</p>	<p>Confidential? – N</p> <p>This question is not applicable to Action on Hearing Loss.</p>
<p>Question 8: Do you support our proposed guidance in Annex 8 on compensation for residential customers?</p>	<p>Confidential? – N</p> <p>This question is not applicable to Action on Hearing Loss.</p>
<p>Question 9: Do you agree with our assessment that device locking can deter customers from switching and cause customer harm?</p>	<p>Confidential? – N</p> <p>This question is not applicable to Action on Hearing Loss.</p>
<p>Question 10: Do you agree with our assessment of the effectiveness in reducing the consumer harm that can result from device locking and the impact on providers of Options 1 and 2?</p>	<p>Confidential? – N</p> <p>This question is not applicable to Action on Hearing Loss.</p>
<p>Question 11: Do you agree with our proposal to prohibit the sale of locked mobile devices?</p>	<p>Confidential? – N</p> <p>This question is not applicable to Action on Hearing Loss.</p>

<p>Question 12: Do you agree that we should protect customers by issuing guidance on our proposed approach when considering the case for enforcement action against non-coterminous linked contracts?</p>	<p>Confidential? – N</p> <p>This question is not applicable to Action on Hearing Loss.</p>
<p>Question 13: Do you agree with our proposed guidance in Annex 9 which sets out our proposed approach to assessing whether certain types of non-coterminous linked contracts are likely to act as a disincentive to switch?</p>	<p>Confidential? – N</p> <p>This question is not applicable to Action on Hearing Loss.</p>
<p>Question 14: Do you agree with our proposal to mandate emergency video relay for emergency communications to be accessed by end-users who use BSL?</p>	<p>Confidential? – N</p> <p>Yes. The UK Council on Deafness, the umbrella body for organisations working with deaf people, has been actively campaigning for the provision of this service and believes Video Relay Service (VRS) access to 999 has the ability to prevent fatalities within the deaf community and ensure that deaf people get more appropriate and quicker support from the emergency services. It would also enable deaf children and adults to access emergency services for the benefit of wider society and potentially save the lives of others.</p> <p>We agree with the case that Ofcom has set out in its consultation document – this reflects the barriers that BSL users face when using text relay services in emergency situations. We note that Ofcom has used conservative figures for the economic benefit of the service and worst case scenarios for the cost – and still demonstrated that the service will be cost effective.</p> <p>This proposal is aligned with the feedback we are receiving from the BSL community who have frequently highlighted poor communication options with emergency services.</p>
<p>Question 15: Do you agree with our proposal that the obligation to</p>	<p>Confidential? – N</p> <p>Yes, we agree. In line with ensuring that emergency services are equally accessible for end-users with disabilities, it is important that emergency video relay for emergency communication are also free for end-users.</p>

provide emergency video relay free to end-users should be imposed on regulated firms that provide internet access services or number-based interpersonal communications services?

We would however urge Ofcom to keep this matter under review. The telecoms market is rapidly changing and the growing importance of Number Independent Interpersonal Communication Services could alter the way in which the general public communicates with the emergency services. Should such a shift take place then it is vital that the regulation which supports deaf and disabled people evolves accordingly.

Question 16: Do you have any comments on our proposed approval criteria for emergency video relay services, or the proposed approval process?

Confidential? – N

Too often, the BSL community is marginalised and overlooked and has solutions imposed upon them without an understanding of deaf culture. We therefore welcome the steps that Ofcom has taken to include the deaf community in this consultation process. However, for the provision of video relay 999 access to have the best impact it must be co-designed in partnership with deaf people. We intend to continue to cooperate with Ofcom on this project after the consultation has closed. But we strongly urge Ofcom to go further and ensure it brings deaf stakeholders as close as possible to the proposed approval processes – potentially bringing relevant deaf experts into the process as consultants - so that the needs of the end-users are intimately and accurately reflected in the solution that Ofcom provides. We also hope that Ofcom and any approved provider(s), will engage with representatives of BSL interpreters – such as the National Registers of Communication Professionals working with Deaf and Deafblind people (NRCPD) and the Association of Sign Language Interpreters (ASLI) – to ensure the instructions and guidance given to the interpreters is appropriate to the nature of the calls they will be handling and the needs of the deaf community.

We envisage that the service would work in a similar way to the video relay service currently available for NHS 111. However, the feedback from the deaf community is that these services can be prone to delays due to a lack of available interpreters. We therefore welcome the stipulations A.10 – A.12 of the Draft Approval Criteria. We would not want to see these standards diminished.

We do however, believe the following amendments and clarifications are required. Firstly, there needs to be more clarification in stipulation A10.6d, regarding the procedure for call-backs. We recommend that any call back should continue to be in a video relay format and be facilitated by SMS link. Secondly, in stipulation A10.7b, we would strongly recommend that the 2 years' post qualification experience be extended to 3 years' post qualification experience in line with ASLI best practice (https://www.asli.org.uk/wp-content/uploads/2017/05/ASLI_Video_Interpreting_Best_Practice_VIBP-1.pdf)

	<p>We would also strongly suggest that the eventual Emergency Video Relay Service provider follows best practice from overseas where possible – even if this is not part of the approval criteria. For example, the potential for a second interpreter to be present during an emergency call to offer support and guidance - and to provide a level of continuity should the call be of such a length that the interpreter wishes to take a break and hand it over.</p> <p>We acknowledge that emergency 999 communication is only the first barrier to accessing emergency services. Communication for BSL users remains a challenge at subsequent stages, for example with first responders and for follow up care. We appreciate that this is not within in Ofcom’s remit but needs to be addressed in the future. We hope that Ofcom engages with stakeholders – such as the 999 liaison committee – to ensure any approved provider is as integrated as much as is appropriate into wider emergency services.</p> <p>We believe stronger language is needed in section 10.43 to ensure service providers communicate the availability of emergency video relay. We have evidence from the UK Council of Deafness Facebook group (https://www.facebook.com/groups/1220369774821653/) that there is a lot of confusion around the availability and ways of accessing existing SMS and text relay services. As a coalition of charities representing people who are deaf, we will also spread the word but there needs to be more onus on regulators and communication providers to inform consumers of the access services they provide. In addition, given the one year implementation period, we strongly believe that Ofcom, deaf charities and regulated communication providers share the responsibility to promote the video relay service. It is essential that BSL users receive regular updates during the approval implementation period to continue engagement and ensure eventual uptake in the video relay service.</p>
<p>Question 17: Do you agree with our proposal to a) extend the current requirement to cover the other specified communications i.e. any communication (except marketing) that relates to a customer’s communication service, and b) extend the GC so that any customer who cannot access communications due to their disability</p>	<p>Confidential? – N</p> <p>This question is not applicable to Action on Hearing Loss.</p>

<p>should also benefit from accessible formats? When answering please provide evidence of any benefits or costs.</p>	
<p>Question 18: Do you agree that implementation by December 2020 is reasonable?</p>	<p>Confidential? – N</p> <p>This question is not applicable to Action on Hearing Loss.</p>
<p>Question 19: Do you agree with our proposed changes for implementing the requirements in Article 108 and Article 109 to reflect the differences between these EECC provisions and their predecessors in the Universal Service Directive?</p>	<p>Confidential? – N</p> <p>This question is not applicable to Action on Hearing Loss.</p>