BT's response to Ofcom's consultation

"Review of Relay Services – further consultation"

13th July 2012

BT welcomes comments on the content of this document, which is available electronically at
http://www.btplc.com/Thegroup/RegulatoryandPublicaffairs/Consultativeresponses/Ofcom/index.htm

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Executive summary

We welcome Ofcom's proposals for Next Generation Text Relay ("NGTR"). The introduction of a more generic and accessible service has the capacity to benefit a far larger proportion of the hearing and speech impaired community than either the current Text Relay service or other, alternative solutions that only a smaller sub-set of individuals can use.

The UK enjoys a vibrant and competitive communications market that must be accessible to all end-users. SMS functionality has made mobile devices a popular solution for hearing and speech impaired people. However, Ofcom's proposal for smartphone NGTR compatibility cannot be realised unless Mobile Providers are required to open access to the service.

NGTR users will benefit from their callers not needing to use a prefix to dial them and we support this development. Customers can avoid a lengthy registration process if the solution is simple and automated and we believe this is easily achieved by allocating 03 and 07 number blocks to each NGTR system available.

A specialist service such as NGTR, should not be subject to more rigorous standards than those in place for standard telephony. It must be possible to restrict access for non-payment of bills, mis-use or network failure and Ofcom needs to reflect this in their proposed revisions to General Condition 15. Performance measures can help end-users understand the quality of service offered by independent providers. However, for these to be easily comparable, measures must be applied consistently and remedial action taken for failure to meet the required standard.

While relay services are vital for enabling hearing and speech impaired people to communicate by telephone, we believe that end-users will not experience equality unless they can contact businesses and organisations direct, without the need for a relay operator. Modern communication technology makes this easy to achieve via accessible websites offering LiveChat and email, direct text-to-text facilities into customer contact centres and SMS access options. Businesses and organisations need to ensure their services are accessible to everyone and if Government, Ofcom and stakeholders work together to encourage this proportionate change, one-to-one conversational equivalence can become reality.

2. Rationale for change

In July 2011, Ofcom set out two options for text relay, preferring provision of an improved, Next Generation Text Relay (NGTR) service, over retaining the status quo.

We are the only provider of text relay in the UK, giving hearing and speech impaired people access to telephone conversations, either direct in real-time text-to-text, or text-to-voice/voice-to-text via an interpreter. BT's platform is the only one in the world with the ability to provide text-to-text without the need for an intermediary, but the current system has never maximised this benefit to end users for reasons outside of BT's control. This is largely because the majority of businesses use text relay as a catch-all solution for their own accessibility obligations under the Equality Act rather than providing alternative, accessible solutions for their customers.

The direct text-to-text functionality offers the potential for considerable benefit, and greater equality to callers by removing the relay operator from the call. However, very few organisations publish a textphone (minicom) number. For those that do, staff are often poorly trained in how to use the equipment or the service is insufficiently staffed. This results in the caller having to make a second call using the organisation's standard customer service number via the fall-back solution of the text relay service, however, via text relay:

- call steering systems are difficult, time-consuming and sometimes impossible for the relay operator to navigate on behalf of the textphone user, and
- many call centre agents refuse to speak with an intermediary or disconnect when a text relay call is connected.

Additionally, legacy textphone equipment can be slow to process the data received. We understand that text conversation that is considerably slower than spoken conversation often frustrates end-users. However, this is often not due to the relay operator's failure to keep pace, but rather the textphone functioning at the limit of its technical capability.

Ofcom's proposal for NGTR will allow users to move away from traditional textphones - replacing clunky, legacy equipment has the potential to increase conversation speed for many calls. However, without concerted action to change how businesses and organisations interact with their hearing impaired clients, it, too, will fall short of achieving its potential, thereby greatly reducing the benefit of replacing the current text relay platform. The Employers' Forum on Disability (EFD) has published best practice advice to help organisations improve their call routing systems, contact centres and the customer experience at: http://www.efd.org.uk/publications/your-call-is-important-to-us. However, EFD will testify that this is a much neglected area and we

encourage Ofcom, government and stakeholders to work together to deliver improvements that will benefit all people with disabilities. We were delighted to note The Minister for Communications' recent efforts to promote wider business responsibility for accessible communications[1]. However, much more needs to be done if the implementation of inclusive customer contact solutions is to become standard practise rather than the exception,

Whilst business engagement alone is unlikely to ensure equivalent access for telephone users with disabilities, it is an essential pre-requisite to the success of any technological innovation. Without it, NGTR will not deliver the step change in user experience it can offer and end-users will suffer similar frustrations and communication difficulties as text relay today. This is true for NGTR and any other relay platform innovation.

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[1] See Annex

## 3. Assessment of Ofcom's proposals: additional analysis of NGTR

Ofcom's proposal for NGTR has three main advantages over the current operating platform.

1. Removing the need for specialist end-user terminal equipment reduces the end user's initial start-up cost and increases the choice of accessible devices to include smartphones, PCs and tablet computers.
2. A dual-tandem system allows a variety of communication options for both the called and calling parties on the call, including; text-to-voice, voice-to-text, augmented voice-to-voice (sub-titled speech) and direct text-to-text, without the need to switch between voice and text.
3. The option for text relay users to have a presentation Calling Line Identification (CLI) number removes the need for the 18002 access code when calling a text relay user.

When assessed against other forms of text-to-voice communication, we agree with Ofcom that NGTR is the most appropriate and proportionate way to deliver greater choice, versatility and communication equivalence for hearing and speech impaired people than is available by text relay or other, niche services.

Text Relay and NGTR
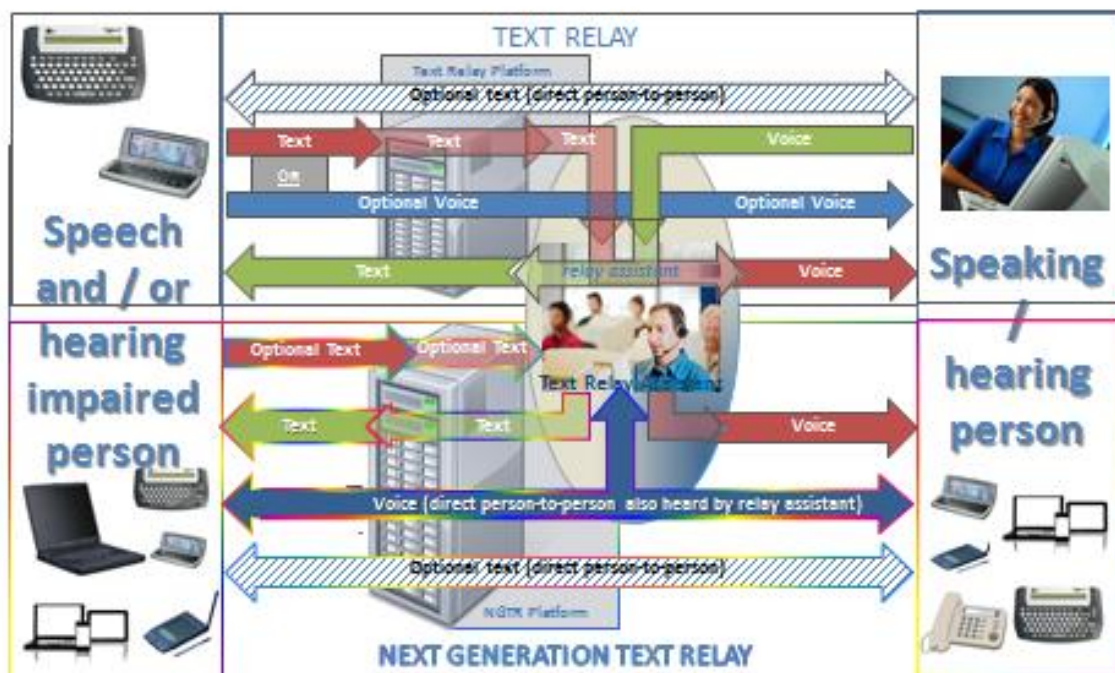
> **Question 1:** *Do you agree that in light of the additional cost data and further clarification, in light of Ofcom's assessment of relevant benefits and other relevant considerations, all CPs (BT, fixed and mobile providers) should be required to provide access to an NGTR service?*

NGTR has the potential to give end users access to real-time conversations away from their fixed line via compatible smartphones and tablet computers. Access to communication on the move is part of everyday life for people without a hearing or speech impairment and, whilst SMS, instant messenger and email are all equivalent communication methods, they are complementary not substitutional to the ability to make a phone call.

Failure to impose regulation that allows customers to choose their Communications Provider(s) is a backward step. The UK enjoys the World's most competitive communications industry and the ability to access NGTR from any telephone service is key to delivering equivalence of access for all end-users.

> **Question 2:** *Do you agree that the need to dial a prefix to access a relay service for incoming calls to the hearing and/or speech impaired end user should be removed?*

We agree that text relay users would benefit from people not needing to dial a prefix to call them. People unaware they are calling a text relay user are likely to find the need for a prefix confusing or be worried about how much they might pay for calling a 1800 number. Additionally, organisations with switchboards often block the 1800 number range. Even if organisations made the relatively simple changes to their systems to allow their employees to dial 1800, there is evidence that text relay users would still have difficulty getting calls from people unfamiliar with the prefix.

However, rather than complete removal of the prefix, Ofcom should propose supplementing it with the option to have an NGTR presentation telephone number as there are situations where a prefix will continue to be required. Retaining the prefix allows NGTR users to choose not to have a Text Number, and lets registered users receive a call on someone else's device if travelling away from home without a registered mobile.

The simplest way for Ofcom to allow the optional removal of the incoming call prefix is to allocate blocks of 03 and 07 phone numbers to each NGTR service for use as Text Numbers. This has two major benefits:

- It allows the various telephone networks to identify automatically specific numbers from within those allocated as needing to route into the NGTR service for onward connection to the person being called.
- It removes the need for a formal end user registration process as Text Numbers can be allocated by the NGTR platform on a first-come, first-served basis.

Text Numbers provided in this way would be overlaid on the NGTR user's standard phone number for calls made via NGTR. Telephone calls on that number not made via NGTR would retain the original Calling Line Identity (CLI), while NGTR calls would use the CLI, overlaid with a unique Text Number. NGTR users with more than one phone number, e.g. a fixed line and mobile, would have two unique Text Numbers, just as a non-NGTR user does.

The NGTR ability to overlay the original CLI with a unique presentation Text Number allows the person receiving an NGTR user's call to see the Text Number displayed to them. Call back services such as Call Return would also automatically use and store the Text Number instead of the original CLI. The Text Number identifies to the network that the call should route via NGTR and this is done automatically, removing any need for the 18002 prefix.

Under this NGTR allocation method, NGTR users would obtain a unique Text Number by using a very simple registration process. One call to the NGTR helpdesk from the phone number the customer would normally use to receive calls would allow an automated system to allocate the Text Number to the NGTR user. The system would use the customer CLI to allocate either an 03 Text Number (for fixed or VoIP CLIs) or an 07 Text Number (for mobile callers).

The benefits of this approach include:
- It supports both legacy and new terminals
- It provides a centrally managed service independent of the text user's Communications Provider
- It can be setup with a simple phone call with no registration
- No change would be required if the text user transfers (ports) their standard phone number to another Communication Provider (ensuring no additional barriers to competition)

4. Timescales and costs: implementing NGTR

Having assessed the technical specification, network interoperability development, and the potential implementation and operational cost of a replacement NGTR platform, we believe it can provide significant advances in the provision of text relay services such as:

- support for parallel communication channels enabling a spoken telephone conversation to be augmented by other communication channels such as text
- an end-to-end service supporting a wide range of terminals such as Web, PC, and mobile terminals through downloadable apps
- support for direct communication between businesses and their customer, and person-to-person, both with automatic access to relay when required
- a service that is fully integrated into the telephone network so that standard facilities such as location information is available to the emergency services.

We believe that any NGTR service must offer, as a minimum, the level of service available from text relay today. Specifically:

- It must be available from all networks including mobile or the potential benefit of accessible, off-the-shelf devices will be lost.
- It must allow direct text-to-text communication without the need for a text relay operator in the call.

Our cost estimate for NGTR includes the decision to build a bespoke platform that replicates the text-to-text functionality we have today, the need to ensure sufficient resilience for cross-network interoperability and emergency call support, planned testing, BT system integration and on-going customer care. Ofcom's cost assessment was based on an off-the-shelf, one-off platform cost and does not include these additional service elements that we consider vital to delivering a robust and efficient solution. We are currently working through a tender process to find a suitable supplier and confirm our intention to wholesale commercially BT NGTR should this consultation process mandate access on all voice telephony providers under General Condition 15.

Question 3: *Do you agree with the proposed approval criteria and KPIs? If not please specify your reasons.*

We agree with the principle that, to protect the quality of service delivered, any NGTR service needs Ofcom approval.

However, if NGTR approval applications are assessed against the proposed requirements of GC15.5 the regulation must take into account corresponding measures in place for standard voice telephony. An example is the requirement that an NGTR service needs to be available for use by end users at all times. This is impossible to guarantee as it exceeds the obligations placed on the fixed, mobile or broadband infrastructure itself under other General Conditions, taking no account of unavoidable service failures (GC3) or the ability to restrict access for non-payment of bills (GC13). A solution is to caveat the proposed obligation as follows:

> *Be available for <u>lawful</u> use by end users at all times <u>subject to other relevant communications regulation.</u>*

For any KPIs to be truly effective there must be consistency in how performance is calculated and reported.   Whilst we have no desire for KPIs to be overly prescriptive, it is important for overall performance transparency that all NGTR providers apply the same rationale and service measurements to their reported statistics. Failure to do so will prevent end-users from easily comparing quality of service between providers.

We agree with Ofcom that there should be no specific requirement/KPI related to outreach activity or specific research and development activity.

Promotion of relay services is an issue for pan-UK plc and not just Communications Providers. The text relay website www.textrelay.org makes users aware of how to access the service and how it works. However, as a business, BT publishes customer contact numbers and these include options tailored for customers with specific accessibility needs[2]. We believe therefore, that businesses and organisations should also promote all customer service contact options including notifying text relay users how to call them where they choose not to provide a direct textphone (minicom) service.

We believe that the end users of any service should not set the operational KPI's for that service. This is because end users and their representatives have individual requirements based on their capability and usage. For KPIs to work effectively they must take into account the business environment, cost and overall consumer benefit and very few end users can consider and properly assess these impacts over the whole customer base. Any attempt to customise the KPI's to meet individual requirements risks degrading the service overall as some are likely to be in direct conflict with others.

We agree that no KPI measure should reflect the development and future use of speech recognition. Developments of this type should instead form part of

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[2] http://www.bt.com/includingyou/index.html

a commitment to continuous improvement and regular testing of technological advancements and innovations.

The criteria set out for call recording are too prescriptive. Situations exist outside of those covered, where recording the entire call is necessary. These include bomb threats or cases of criminal activity. Rather than attempting to capture all instances where call recording is allowed, Ofcom should instead set out a generic requirement that gives the relay provider sufficient freedom to determine on a call-by-call basis when a recorded record of the call is needed. This should in no way impact or undermine the need for confidentiality of conversations made via relay services.

BT does not currently carry out customer satisfaction surveys of users of the text relay service. Callers using Text Relay take telephony from Communications Providers including, but not exclusive to, BT. We believe that customer satisfaction should be researched by the Communication Provider supplying telephony service overall and BT regularly undertakes its own surveys across our customer base. In this way, Communications Providers understand their customers' needs and can take action to implement appropriate change where appropriate. This is one aid to creating and developing competitive markets and helps to ensure service differentiation, quality and customer choice.

We agree with the KPIs as they are set out by Ofcom within the consultation. However, we believe that for clarity the final entry *"Total calls to be subject to a handover"* needs amendment to:

    Total calls to be subject to a <u>relay assistant</u> handover.

We would also like to understand the process Ofcom would follow in the event of an NGTR provider failing to comply with the KPIs. We assume that likely remedial action would include a timeframe for improvement and further quality review by Ofcom; however, this is not included within the document. In the interests of transparency, it would be helpful if Ofcom could include this information in the statement that will follow this consultation. We suggest the process for remedial action should demonstrate an ability to meet the required KPIs within a 3-month timeframe, by the following:

- Independent speed and accuracy analysis
- Independent audit of reported KPIs
- Independent mystery shopping
- Independent customer satisfaction survey

ANNEX: Copy of letter from the Minister for Communications, Content and Creative Industries dated 13th June 2012

Minister for
Communications,
Content and Creative
Industries
2-4 Cockspur Street
London SW1Y 5DH
www.culture.gov.uk

Tel
Fax

Your
Ref
Our Ref

department for
culture, media
and sport

13th June 2012

Dear Sir/Madam,

As Minister for Communications, I'm writing to you as head of an organisation that depends on effective communications with its customers.

As you know, it's vital to your success to allow everyone who wants to do business with you to contact you quickly and effectively. Unfortunately, we know that sometimes, traditional call centres get in the way, especially of customers with particular needs, perhaps because they are older or have disabilities.

I'd like to tell you about the latest best practice guidance on improving access to customer contact centres, produced by the Employers' Forum on Disability with help from BT.

"Your Call is Important to Us" sets out simple ways in which you can ensure all your customers are able to do business with your contact centres. It recommends you allow customers to deal with you in ways that they find easy, including by email and by text as appropriate, and gives guidance on ensuring the menus for your call centres are simple to navigate.

It also stresses the importance to deaf and hard of hearing customers – remember, there are almost two million in the UK – of ensuring your contact centres are able to handle calls made using the text relay service, which lets deaf people use the phone through a confidential operator.
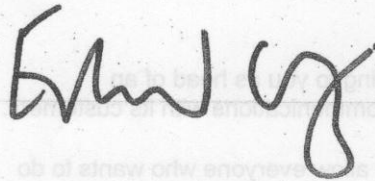
improving
the quality
of life for all

I hope you will agree with me that the recommendations in this report are sensible and practical, and that you will be able to direct those in charge of your contact centres to adopt them.

For ease of reference, as well as the report I have included a Best Practice Charter for your own organisation, and a Contact Centre Service requirement which outlines the best practice you should ask third party contact centres to deliver.

I am committed to seeing improvements made for communications services for disabled people in the UK. You may already be aware that Ofcom is currently investigating how this may be done, especially by making improvements to the text relay service.

I will follow up this letter in six months' time to find out what arrangements you have made in your contact centres to ensure that all your customers, including those who are older or have disabilities, can do business with you effectively.

Ed Vaizey Minister MP
**Minister for Communications, Content and Creative Industries**

If you would like further copies of "Your Call is Important to Us", you can download them from
www.efd.org.uk/publications/your-call-is-important-to-us

If you would like further information on the guidance in the report, please contact the Employers' Forum on Disability.

Employers' Forum on Disability
Nutmeg House
60 Gainsford Street
London
SE1 2NY

enquiries@efd.org.uk

Best Practice Charter: Contact centre quality commitment
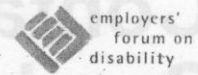
employers' forum on disability

We will meet the needs and expectations of disabled and older customers by implementing a contact management strategy which embodies best practice, in order to improve the customer experience, build trust and enhance brand reputation.

As an organisation committed to best practice we will:

Ensure that all websites are accessible, usable and enable customers to determine how they prefer to contact us.

Maximise accessibility for every customer by offering a contact-mix which includes contact centres, email, chat or instant messaging, text messaging and post. We will empower the customer to determine which contact-mix best meets their needs.

Ensure that our contact-mix has the same look and feel across every department and will deliver a similar standard of service, regardless of contact method, to every customer.

Train every customer-facing agent and equip them to provide our disabled and elderly customers with high quality customer care.

Ensure that information held on any customer's disability and/or impairment is used only to enhance customer experience and not for sales messages unless this has been agreed with the customer.

Be transparent: our charges, policies and schedules will be readily available and accessible, and written in clear, straightforward language.

Engage with a wide range of older and disabled customers, or their representatives to ensure our services are inclusively designed and that their requirements are included throughout the life-cycle of our products.

Ensure that call routing menu options are inclusively designed and reflect best practice for our customers.

Ensure that customers are not required to repeat information already provided to one agent when transferred to another.

Ensure our customer satisfaction surveys capture the views of disabled and older customers as a distinct customer segment and use the findings to improve performance.

Provide routine updates to the board on our progress in delivering against these commitments.

Contact Centre Service
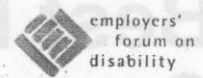
We will meet the needs and expectations of disabled and older customers by implementing a contact management strategy which reflects best practice as defined in the following procurement requirement.

Where we procure these services from others we will require our suppliers to:

Ensure that all websites are accessible, usable and enable customers to determine how they prefer to contact us.

Maximise accessibility for every customer by offering a contact-mix which includes contact centres, email, chat or instant messaging, text messaging and post. Our call centre suppliers will empower the customer to determine which contact-mix best meets their needs.

Ensure that the contact-mix has the same look and feel across every department and delivers a similar standard of service, regardless of contact method, to every customer.

Train customer-facing agents and equip them to provide our disabled and elderly customers with high quality customer care.

Ensure that information held on any customer's disability and/or impairment is used only to enhance customer experience and not for sales messages, unless this has been agreed with the customer.

Be transparent: charges, policies and schedules will be readily available and accessible, and written in clear, straightforward language.

Engage with a wide range of older and disabled customers, and/or their representatives, to ensure all services are inclusively designed and that the requirements of these customers are included throughout the product life-cycle.

Ensure that call routing menu options are inclusively designed and reflect best practice for every customer.

Ensure that customers are not required to repeat information already provided to one agent when transferred to another.

Ensure customer satisfaction surveys capture the views of disabled and older customers as a distinct customer segment, and are used to deliver continuous improvement.

Provide routine updates to their corporate clients on their progress in delivering against these commitments.