

# OFCOM CONSULTATION ON REVIEW OF RELAY SERVICES – FURTHER CONSULTATION

## HEARING LINK TELECOMMUNICATIONS WORKING GROUP RESPONSE

### ***Introduction***

Hearing Link is a national charity with the aim of enabling people with acquired hearing loss to participate fully in society. It is estimated that there are around 9 million hearing impaired people in the UK with, in addition, an extensive network of families, friends and work/education colleagues. Approximately 4 million have hearing loss severe enough to benefit from hearing aids, and of these around 2 million are hearing aid users. They include all age groups and although most will be older, younger working people are also involved. They include those whose hearing loss arose gradually over a period of years as well as those who sustained a sudden hearing loss. In this response, we use the term “hearing impaired” to cover this wide range of people.

In the context of telecommunications, most of these people communicate using speech and their residual hearing (whether aided or not), although those with profound hearing loss often require some form of support.

“At the moment, most people would agree that a telephone is needed in order to be included in society” and “Access to communications services will become a pre-requisite for participating fully in society” (Ofcom Annual Plan 2007/8). Functionally equivalent access to telecommunications at equivalent cost is, therefore, vital for hearing impaired people.

The Telecommunications Working Group of Hearing Link deals with access to telecommunications for people with acquired hearing loss and we welcome the opportunity to respond to the consultation.

### ***The UKCoD/TAG response***

Hearing Link is a member of both UKCoD and TAG and we endorse fully the UKCoD/TAG response to this consultation. The UKCoD/TAG response has covered Ofcom's formal questions. However, these questions impose a constraint and we wish to comment on aspects that are of particular relevance to the hearing impaired people that our charity represents.

### ***Hearing impaired people whose preferred means of communication is speech***

Our members are representative of the major group of hearing impaired people – those whose preferred means of communication is speech but who may need some assistance to participate fully in conversations depending on the level of hearing loss.

As regards telecommunications, we communicate using speech and residual hearing, although some form of support may be required. For some, improved hearing aids or cochlear implants are a good form of support but others need an intermediary. With a gradual hearing loss, an individual may be reluctant to have to admit to their hearing loss, particularly those at work, and will become increasingly reluctant to make a call, potentially leading to despondency, depression and unemployment (see the references in the next section). For all of these people, the current communication support is inadequate – especially when one has been used to normal domestic and business phone calls in life before deafness.

*We believe that this large section of the hearing impaired community should be helped to continue to enjoy the same quality of communication in their life despite their hearing loss. This means feeling comfortable using the telephone for as long as possible despite their potentially deteriorating hearing and allowing them to participate fully in society. We believe that despite the emergence of other forms of communication in recent years, the telephone is irreplaceable for most key uses so that a relay service that enables telephone conversations close to normal is vital.*

### ***Speed of transcription***

Hearing Link believes that a transcription speed that approximates normal conversational rate is the only way to provide functionally equivalent access to voice telephony for those whose preferred means of communication is speech. Available information indicates that transcription rates of at least 125 wpm are required to do so.

The huge benefits of such speeds have been demonstrated in the context of captioned telephony, and Hearing Link urges Ofcom to study the following independent reports documenting the social and employment benefits that result.

*The Plum report (Voice telephony services for deaf people. An independent report for Ofcom. June 2009)*

*ACE Web Captioned Telephony Trial (October 2009 - Feb 2011)-1*

*Connelly, L.B. (2011) An Evaluation of the Australian Captioned Telephone trial, mimeo: Brisbane.*

[pdf versions of the two Australian reports are attached to this response]

Hearing Link strongly requests that the matter of transcription speed be considered a key issue. Speeds that approximate to normal conversational speech should be an essential performance indicator of any proposed system.

### ***Captioned Telephone Relay***

We are also concerned that the Ofcom response document does not address the place of Captioned Telephone Relay, which is a major form of relay discussed in the original consultation and referred to in the many independent reports prepared for Ofcom. We believe that this is a significant omission.

The document does not take into account the responses of the ten out of thirteen stakeholders representing hearing impaired people who would like to see Captioned Telephone Relay being more widely available. The Ofcom definition of “Caption Telephony” in Annex 8 demonstrates a misunderstanding of Captioned Telephone Relay as it is currently in use both in the UK and abroad.

A Captioned Telephone Relay allows hearing impaired callers to speak to the hearing caller, listen to the hearing caller with whatever residual hearing they may have and see the transcribed text word for word of the hearing caller’s speech displayed on a terminal. Both caller and hearing impaired person can interrupt at any time. A crucial characteristic is that the transcription speed is close to that of normal speech. For instance, ITU TD 464 (PLEN/16) requires 98% accuracy at 125 wpm with a maximum delay of 8 seconds, tested using a standard script.

### ***Choice, competition and take-up***

There can be no single relay solution to satisfy everyone. Ofcom rightly has recognised that people whose first language is BSL need VRS whilst we argue that real-time relay is the only functionally equivalent relay for a large proportion of hearing impaired people. Others will benefit from the flexibility that NGTR could offer.

Hearing Link agrees with others that we need choice of service and competition to satisfy a variety of needs and drive innovation. A separate real-time relay could be the first step – especially as commercial Captioned Telephone Relay services could be made available well before an NGTR service could be launched.

The numbers need not be large. Despite some 400,000 potential beneficiaries of real-time relay in the UK, the likely take-up will be much lower. If we take into account improvements in hearing aids, telephones, lack of access to broadband and lack of interest, then the resulting take-up figures are likely to be something of the order of eight thousand.

### ***Conclusion***

Hearing Link is of the opinion that the key shortcoming in the Ofcom document is insufficient attention to the need to provide access to telephony at near-normal conversational speeds.

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Captioned Telephony services currently offer such speeds and should be given closer scrutiny as an alternative while progress is made on NGTR.