



The Mobile Broadband Group

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Ofcom review of Relay services- a further consultation

Response from the Mobile Broadband Group

1. The Mobile Broadband Group ('MBG'), whose members are the UK mobile businesses of Telefonica O2, Three, Vodafone and Everything Everywhere, welcomes the opportunity to respond to Ofcom's further consultation on Next Generation Text Relay ('NGTR').
2. The MBG recognises the need for advances in communications technologies to benefit all in society, including those with disabilities.
3. Indeed many recent mainstream advances in mobile and other communications technologies have achieved just that: text messaging, voice to text messaging, instant messenger services, video calling, and voice activated commands to name a few.
4. The MBG's response to the consultation is set out in reply to the questions posed by Ofcom within the consultation document.

Section 3 – Additional analysis on 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?

5. The MBG is grateful that Ofcom has followed through on its commitment to establish a workshop to discuss the technical specifications for NGTR to assist in understanding how (or whether) the proposed NGTR platform will be compatible with mobile telephony and the mobile customer experience.
6. The workshop has been helpful in enabling the mobile network operators ('MNOs') to start assessing the feasibility of NGTR for mobile. The MNOs will review and digest the information received at the workshop on 21st June 2012. There are, however, some key questions that remain, including the cost of providing NGTR on an ongoing basis (and this will not be clear until the NGTR service provider(s), e.g. BT, have defined their solution) and the presentation of a secondary MSISDN ('CLI') for outbound NGTR calls, which cannot be texted back by the mobile recipient of the NGTR call.

7. In addition, the MBG would like it noted that there remains considerable uncertainty about the demand for NGTR services. Ofcom's judgement is that on current mid-estimates it is proportionate to require all communications service providers ('CSPs') to offer NGTR to customers. If it turns out the demand far exceeds expectations, the funding model must be kept under review to avoid the risk of a disproportionate burden being placed on CSPs.
8. Also, while Ofcom is not intending to regulate BT's prices in the absence of a competitive problem, it is in a position to judge whether their proposals are cost effective from the perspective of all parties and make this one of the approval criteria.

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?

9. The matter of whether the 18xxx prefix should be supplanted was also discussed at the workshop on 21st June.
10. The MBG has no objection in principle to the prefix for incoming calls to the NGTR being replaced, so long as the cost of doing so is not prohibitive and is proportionate.
11. The MBG understands that BT's proposal is to allocate a secondary 07XXX number to each mobile NGTR user, so that the consumer has two mobile numbers – the one allocated to them by their MNO, and the secondary one allocated by BT to facilitate the routing of NGTR calls to/from the NGTR platform.
12. As a deaf or hard of hearing customer's outgoing call passes through the NGTR, BT will change the CLI from the MNO allocated number to the BT allocated number. Thus, if the call goes unanswered the return call number presented on the screen of the call recipient (or the return call facility on voicemail) will be the BT allocated number.
13. If the intended recipient then returns the call, the call will automatically be directed to the NGTR platform and the relay assistant will help the deaf or hard of hearing customer handle the call.
14. To all intents and purposes, the customer's number to the outside world will be the BT allocated number and not the MNO allocated number.
15. This presents a problem for SMS (text messaging). If the intended recipient decides to send an SMS rather than call back, the SMS will disappear into a black hole and neither the texter nor the deaf or hard of hearing customer will be any the wiser. One solution to this would be for BT, who is already a substantial provider of SMS services and therefore has the necessary infrastructure, to provide SMS delivery of texts sent to the secondary number.
16. If text messages cannot be sent to the display phone number, it will not be appropriate to use a number from the mobile number range at all. This will only sow confusion in the market over 07 numbers (and there is already some confusion and fraud associated with 'follow me' numbers), as well as causing annoyance to the calling and called parties. BT should be strongly encouraged to be able to forward SMS sent to a secondary number, if it is to be from 07xxx range.

Section 4 – Implementing NGTR

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

17. The MBG understood from the technical workshop that, as part of the development, BT (or BT's NGTR provider) would be supplying 'Apps' for smartphones, so that a deaf or hard of hearing customer using a mobile would be able to access an end to end service and would not have to purchase any specially adapted equipment – and nor would the MNO have to provide any.
18. As far as the MBG is concerned, this is a key element of BT's proposed design and thus an absolutely critical approval criterion for the approval by Ofcom of an NGTR platform.
19. With respect to changing KPIs on transcription speeds, the MBG recommends that, for the time being at least, Ofcom makes no changes. The reason is that it is too early to say how easy it is going to be to provide voice call, using a voice channel, in parallel with the transcribed words, using a data channel. There seems little point in pressing the relay assistants to transcribe more quickly when no one knows whether the technology will be able to keep up, particularly when some of the factors are going to be beyond the platform provider's control (i.e. the data element being delivered by the Internet.)
20. The MBG is happy to discuss further any of the matters raised in our response.