



**Sky's Response to Ofcom's Review of Next Generation Text Relay**  
**13 July 2012**

**Summary**

1. Sky welcomes the opportunity to respond to Ofcom's consultation on Next Generation Text Relay. As a responsible broadcaster and communications provider we have long had a commitment to helping and supporting all our disabled customers to make the most of their communications services with Sky. We support Ofcom's proposal to provide a next generation text relay service (NGTR) and are pleased that BT is prepared to provide a wholesale service that is charged on a per minute basis. We urge Ofcom to monitor these rates but acknowledge that Communications Providers (CPs) could make complaints under the Competition Act should wholesale rates for BT's NGTR service become excessive.
2. We note that Ofcom intends to consult further on the costs and benefits of the options for a restricted Video Relay Service (VRS) later this year. We would welcome a further consultation because, given the current cost benefit analysis conducted by Ofcom, we do not consider that the provision of VRS, be it unrestricted or restricted, is a proportionate requirement to be imposed upon and funded by the communications industry alone. Any proposal to implement VRS requires broader business and Government engagement to determine how such a service would be funded. Sky will remain actively involved in the DCMS-led eAccessibility Forum subgroup on Relay Services which has the expressed objective to consider these funding concerns.

**Introduction - Sky's Accessibility Programme**

3. Sky has a dedicated team of over 100 customer service representatives who are highly trained and provide specific support for our disabled customers. We were the first broadcaster to go beyond Ofcom's Television Access Service Requirements by voluntarily delivering 20% audio description on our programming, which we regularly exceed, and the first to provide products like Sky Talker, which vocalises parts of the Electronic Programme Guide for blind and partially sighted customers, and the easy grip remote control for those with mobility impairments.
4. Our disabled customers are given the opportunity to receive any communications from Sky in formats of their choosing, including Braille, large print and audio, and we have built a dedicated website where information about all our products, services and support for disabled customers is provided in an accessible format (see [www.sky.com/accessibility](http://www.sky.com/accessibility)). We also enable our speech and hearing impaired customers to contact us through our direct, real-time service; TextPhone, whilst also supporting them in more traditional telephony channels by up-skilling all our customer-facing staff to ensure they know how to respond appropriately to these customers. However, we are finding that as technology has evolved, more of our disabled customers have moved to contacting us regularly by email and services like TextPhone, rather than by telephone. Indeed, across the wider customer base we are also seeing a decline in traditional telephony as the use of online services continues to grow.



Fundamental to our approach to accessibility is our aim to invest in a manner that does not favour one particular disability group at the expense of another.

## Delivery

5. Sky notes that Ofcom stands by its estimated implementation capital costs for a Next Generation Text Relay (NGTR) service of £348,000 despite the fact that BT claims these costs could be as high as £1.9million. We are unable to comment on the accuracy of these costs on the basis that in order to validate these we would need to deploy significant resources to produce a draft service design and estimate a number of costs. However, Ofcom appears to attribute the reason for this discrepancy in cost estimates to the fact that BT intends to include non-mandatory functionality in the NGTR service that it is developing. We have little or no means to question any of these figures but it is likely that BT will be the only provider of an approved NGTR service on a wholesale basis, which means that other CPs will effectively be required to purchase a service that may go above and beyond what is required to comply with the revised GC15. The costs associated with any approved NGTR service need be monitored by Ofcom to ensure they do not become disproportionate to its stated objective.
6. Ofcom suggests that some CPs may look to develop their own “in-house” options for providing a NGTR service. We would not consider this to be a realistic option. CPs currently take a “managed service” from a supplier to discharge their Text Relay obligations and it is unlikely that CPs would look to develop this service in-house as the functions that they would need to support this are not core to their businesses. BT’s commitment to provide a wholesale offering of NGTR for CPs to purchase is a much more attractive option to CPs in that it is the least disruptive and does not require new functional areas to be established.
7. Sky notes that an end-user of NGTR would require a broadband connection in order to use the service and suggests that Ofcom needs to be suitably transparent about this fact for the benefit of potential users.
8. Finally, we note that Ofcom intends to issue a separate consultation concerning VRS later this year. Until we provide further commentary on this matter please refer to our position set out in our consultation response dated 27 October 2011.