

CABLE&WIRELESS RESPONSE TO THE OFCOM REVIEW OF RELAY SERVICES

Cable&Wireless
Worldwide

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INTRODUCTION

Cable&Wireless Worldwide (CWW) welcomes the opportunity to respond to Ofcom's consultation on the review of relay services. Our network currently carries about 800 text relay (TR) calls a month, which according to the Ofcom figures would suggest that TR traffic on our network accounts for less than 1% of TR calls across industry. It is also worth noting that a high proportion of our TR calls are to 999 services.

Whilst we are supportive of any initiative which improves services for disabled users, we are very concerned about the proposals, believing that Ofcom is taking the wrong approach with this assessment of relay services.

Ofcom proposes three key changes:

1. An improvement to the existing TR service by introduction of additional features for a "next generation text relay" (NGTR) service
2. The removal of the USC upon BT for the provision and cost control of the existing TR service; and
3. Consideration of the introduction of a video relay (VR) service, initially as a restricted service, aimed at providing equivalence to British Sign Language (BSL) users.

Under the current regulatory regime there is clear supply from BT and transparency of the service so all providers know what to expect and so do end users. This certainty is lost when we have no idea whether BT will be building its own NGTR service, whether others will be available or what the cost will be to our business.

Without such a service being available currently it is not possible to consider whether it would be proportionate for our business as we have no way of knowing whether this type of service is required, will be used by our customers or indeed is what they want to ensure better equivalence of telecoms services.

The same is also true of the introduction of a VR service. There is no way of knowing whether our customers would see benefit from this service, whether it was restricted or mandated 24/7.

Furthermore with the removal of the USC on BT, the certainty of the current TR service and the associated price-cap is lost and Ofcom will be creating a situation of uncertainty for providers who may have to consider building their own bespoke solution, if BT is not forthcoming with plans for a wholesale NGTR service.

Rather than mandating a NGTR service and considering mandating a restricted VR service, Ofcom should be considering what options are available and then consult on whether to make the services mandatory. If Ofcom believes such services will bring benefit to hearing impaired users they should start a tendering exercise for approved services and consult further on whether it is proportionate to mandate the services for all providers. Indeed creating a market of services will improve price competition and may even limit the need to regulate. Approaching the review in this way removes the need for speculation over implementation times, cost and whether or not BT will wholesale their services; and if tendering is not an option, Ofcom should be seeking clear assurances from BT on supply and cost to counteract the removal of the USC.

QUESTION 1: DO YOU AGREE THAT NGTR WOULD PROVIDE GREATER EQUIVALENCE THAN THE EXISTING APPROVED TR SERVICE? DO YOU AGREE THAT WE HAVE CONSIDERED AN APPROPRIATE RANGE OF IMPROVEMENTS?

We do not have any expertise in what would benefit hearing or speech impaired users.

QUESTION 2: DO YOU AGREE WITH THE PROPOSAL TO IMPLEMENT NGTR THROUGH THE AMENDMENT TO GC15? DO YOU AGREE THAT THE CRITERIA WE PROPOSE SATISFACTORILY EMBODY IMPROVEMENTS WE SUGGEST FOR NGTR?

As already mentioned we do not believe that Ofcom should be mandating a NGTR at this point. Ofcom should be looking at how these services can be provided, who will provide them and whether making them mandatory is appropriate for all communications providers.

Of that drafted change to GC15 we are concerned about the implication of GC15.5(g) which does not allow us to require a prefix to preselect the TR service. We are unclear what changes would be needed on our network to allow this to work or indeed how it would work if more than one person is using the same line and not needing to use the TR service. A lot would depend on how the NGTR service operates and our interaction with that service – potentially we would need to make changes to our network which could prove costly for such a small number of users.

QUESTION 3: DO YOU AGREE THAT A PERIOD OF UP TO 18 MONTHS FOR IMPLEMENTATION OF NGTR, FOLLOWING AN OFCOM STATEMENT, IS APPROPRIATE?

We have no experience of building our own text relay system let alone a next generation one, so it is difficult to comment on whether 18 months would be enough, but we suspect it is not.

It is also important that Ofcom not only consider the time it takes to implement a NGTR service by the provider of the service (and BT have indicated to us that 18 months is not enough) but consideration must also be made for implementation time needed on each communication provider's network. Until providers of NGTR come on line, it is difficult to say how long that might be.

QUESTION 4: DO YOU CONSIDER THAT THE REQUIREMENT TO ENSURE EQUIVALENT SERVICES FOR DISABLED END-USERS WOULD REQUIRE A MANDATED VR SERVICE IN SOME FORM FOR BSL USERS? PLEASE INDICATE THE BASIS OF YOUR RESPONSE.

QUESTION 5: DO YOU AGREE THAT A RESTRICTED SERVICE WOULD BE MORE PROPORTIONATE IN PROVIDING EQUIVALENCE FOR BSL USERS THAN AN UNRESTRICTED SERVICE?

QUESTION 6: PLEASE PROVIDE YOUR VIEWS ON METHODS 1 – 5 FOR A RESTRICTED VR SERVICE DISCUSSED ABOVE. ARE THERE ANY OTHER METHODS THAT ARE NOT MENTIONED THAT WE SHOULD CONSIDER? IN MAKING YOUR RESPONSE, PLEASE PROVIDE ANY INFORMATION ON IMPLEMENTATION COSTS FOR THESE SOLUTIONS WHICH YOU BELIEVE IS RELEVANT.

QUESTION 7: DO YOU AGREE THAT A MONTHLY ALLOCATION OF MINUTES COMBINED WITH A WEEKDAY/BUSINESS HOURS SERVICE WOULD BE THE MOST APPROPRIATE MEANS TO RESTRICTING THE SERVICE?

The question is not whether a VR service should be mandated or restricted, but whether it is proportionate for one to be provided and whether it is reasonable to expect communication providers to fund its provision. As already stated Ofcom should be seeking out possible VR solutions and what the take-up would be before considering mandating the services.

We would like to see more research about the need from the BSL community; whether that need outweighs the cost; whether it is appropriate and proportionate for all providers to be expected to provide the service; the expectations of 999 cover (which we believe would mean a considerable cost to implement on our network) and whether the terms of a restricted service are appropriate.

We also believe that Ofcom should be looking in more detail about how VR services should be monitored and faults handled, because it is not possible to monitor or manage faults in the same way as it is with voice. Again we think we would need to make considerable investment to support a VR service and again it is not clear to us that it is proportionate for such a service to be mandated even as a restricted service, for all communications providers.

Finally, we believe that a VR service is putting mobile networks at an advantage against fixed line because they will not be compelled to provide such a service.

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