

Consultation on ‘Harmonised European numbers for services of social value’

Comments submitted by PhoneAbility

1. PhoneAbility does not offer any comment upon the main text of the Consultation Document, and we will not therefore make any response to the specific consultation questions. We do however have some serious reservations about the process for granting harmonised numbers for these services of social value, leading us to question the legality and practicality of what is proposed. We are grateful for the opportunity to put forward these views, and this response summarises our reservations.

2. We note that it is the very clear intention in the Commission’s Decision documents that the services for which harmonised numbers are allocated shall be open to all citizens. Furthermore, Recital (1) to the first decision signifies that this is to include travellers and disabled users. We conclude from this that it is the intention that no EU citizen shall be excluded from these services on account of language barriers or an inability to use the public telephone system in voice mode. The language barriers can be dealt with by having real-time translation services readily available and we would assume that appropriate conditions will be inserted in the Service Eligibility Criteria for each harmonised number; PhoneAbility does not wish to comment further on this specific aspect.

3. Our particular concern is for those citizens who cannot communicate effectively through the spoken voice. Their needs are just as great as those of any disadvantaged group and their frustrations at not being able to use commonly accepted methods of communication add greatly to their vulnerability. It is especially unthinkable that they should be excluded from access to services which OFCOM describes as being of ‘extreme social value’, yet the present proposals will risk doing just that. It is our view that any service provider who did not offer such access would be liable to legal action on grounds of discrimination.

4. At present, deaf and speech-impaired people who cannot use voice telephony may use the text relay service, which is accessed in the UK through the 18xxx series of numbers. This may not be ideal when highly personal and private emotional matters are being discussed, because of the necessary involvement of a third party, and text relay is most unsatisfactory for those whose native language is British Sign Language (BSL). Nevertheless, despite these and other inadequacies, text relay may pass as the ‘reasonable adjustment’ demanded by the UK’s disability discrimination legislation. If critical telephone support services are to be accessed through a single harmonised 116xxx number, the text relay service will be by-passed. Since telephone terminals do not at present send an automatic recognition signal to show that a relay service is requested, nor do the networks have the means to respond to such a handshake, any deaf or speech-impaired persons exercising this 116 facility offered to all European citizens will find that their calls will be connected but no conversation is possible thereafter.

5. A similar situation exists with the 112 number and PhoneAbility has frequently drawn the Commission's (and OFCOM's) attention to this problem. At least with 112, there is the facility to trace the call and send the emergency services to investigate. This is not an appropriate response with the help-lines linked to the use of 116. We note that the allocation of a 116 number does not prevent the service provider from offering services on other numbers, so a connection using 18xxx links would still be possible. However, this would be entirely contrary to the Commission's policy of having a single memorable number for use by all citizens, as well as confounding its loudly declared policies on e-inclusion and e-accessibility.

6. PhoneAbility believes that OFCOM is also a strong supporter of inclusion policies of this nature, and we are mystified as to why these proposals for services of social value have progressed to the present point without addressing the issues set out above.

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