



OFCOM CONSULTATION DOCUMENT ON MOBILE CITIZENS, MOBILE CONSUMERS

HEARING CONCERN LINK TELECOMMUNICATIONS WORKING GROUP RESPONSE

Introduction

Hearing Concern LINK is a membership organisation with the aim of enabling people with hearing loss to participate fully in society. It is estimated that there are, of the order of, 9 million people with hearing loss in the UK with, in addition, an extensive network of families, friends and work/education colleagues. We use the term people with hearing loss to include those in the early stages of losing their hearing, hearing aid users and deafened people. It covers all age groups although many will be older. The function that draws us together is that we wish to communicate by voice.

In the context of telecommunications, most of these people communicate using speech and residual hearing, although, for the more severely affected people, other forms of support will be required. Equivalent access to telecommunications at equivalent cost is vital for people with hearing loss.

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

The value of mobile telephony and the barriers to inclusion

We note the disproportionately low levels of mobile ownership amongst older and disabled users (5.52). Whilst this may relate to affordability or lack of interest amongst some groups, there are definite barriers to inclusion which affect people with hearing loss (and many older users will have hearing loss) and, especially, younger for people with hearing loss.

In section 2.3 you say:

- most of us, including most children, now have or can access at least one mobile phone;
- we use mobile phones to send as many text messages as we make phone calls;
- mobile services are a vital input to business, with the way we work increasingly reliant on connectivity on the move;

These comments demonstrate one great advantage of mobiles for people with hearing loss – SMS text messaging - but also demonstrate the huge effect of the barriers faced by people with hearing loss. Many of these barriers have been recognised for some time but action is still needed to remove or ameliorate them.

Interference:

Potential hearing aid users are put off by the fact that many mobiles interfere with many hearing aids so that voice usage is difficult or impossible. This problem is reducing as hearing aids and mobiles improve. However, many people with hearing loss assume that they will not be able to use a mobile phone whilst those that think they could use one find barriers to testing before buying mobile phones for their personal use.

The FCC legislation in the US forces manufacturers to publish data on mobiles that can be used with hearing aids and this must help potential users tremendously. Although legislation similar that that in the USA may not be feasible here, we believe that Ofcom should seek

some means of encouraging manufacturers, service providers and retailers to publish relevant information such as degree of interference with hearing aids and available earpiece volume. In the same vein, while legislation in the US forces manufacturers to include a built-in inductive coil, Ofcom could encourage manufacturers to follow suit (and increase their potential market by many millions).

SMS charging:

An issue for those that make use of SMS regularly (in order to overcome the problems of voice telephony) is that many service providers offer cheap offers for voice usage that do not apply to SMS usage. This issue raises its head regularly and perhaps it is time for regulation based on equality of service.

SMS access to emergency services:

We are pleased to note that this issue is raised in 5.61 Access to safety of life services.

We note also that the 999 liaison committee is debating the issue of use of SMS texting for emergency access and understand that Ofcom contributes to the discussion. We support this and encourage Ofcom to move the work ahead as swiftly as possible.

The current piecemeal state of affairs, with some police forces offering a service (often different to others) and others not, confuses potential users and is unacceptable.

Customer service for people with hearing loss:

The fourth issue that we would raise is that the customer services departments of mobile operators usually assume that the user is happy to deal with them on the telephone and alternative, text-based, options are either unavailable or difficult to track down. We support the concept of the “click to chat” real time text system being developed by BT and ask Ofcom to encourage further usage of such communication amongst mobile service providers.

Advice

5.57 refers to the use of RNID & RNIB publications and advice. However, useful advice for people with hearing loss is not restricted to these sources. For instance BT publishes “Sound Connections” and Hearing Concern LINK publishes a fact-sheet on using the telephone.

Summary

Lack of access to mobile communications is still a significant barrier for people with hearing loss. Older people cannot make full use of the convenience of mobile communications and those at work suffer in career development. We welcome Ofcom’s commitment to further research on these issues (5.60) and urge you to further this with all speed. We should be glad to offer our services as far as we are able.