



OFCOM CONSULTATION DOCUMENT ON THE DRAFT ANNUAL PLAN 2007/8 HEARING CONCERN TELECOMMUNICATIONS WORKING GROUP RESPONSE

Introduction

Hearing Concern is a membership organisation with the aim of enabling hard of hearing people to participate fully in society. It is estimated that there are, of the order of, 9 million hard of hearing people in the UK with, in addition, an extensive network of families, friends and work/education colleagues. Hard of hearing people include those in the early stages of losing their hearing, hearing aid users and text users. It covers all age groups although many will be older.

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 hard of hearing people.

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

The need for access

We are very pleased to see two statements that support our view that hard of hearing people and similar minorities (if 9 million people can be called a minority) are losing out from lack of access to communication.

In section 4.21, you state that “At the moment, most people would agree that a telephone is needed in order to be included in society” and in section 4.24 “Access to communications services will become a pre-requisite for participating fully in society”. These statements provide damning evidence to support our claims that hard of hearing people are isolated from society when they cannot use a telephone or have great difficulties using a telephone.

We believe that it behoves Ofcom and Government to make it a priority that all people have functionally equivalent access to all forms of telephony at equivalent cost - ie, they should be able to have a telephone conversation that matches a hearing person talking at ease on the telephone.

Ofcom's aim to promote access and inclusion

Obviously, Ofcom's Annual Plan has to cover a very wide range of activities and our interests focus only on a part. Because we represent people for whom communication is often a severe problem, we are pleased to note that promoting access and inclusion is to be a policy priority for 2007/8.

Whilst we recognise that light touch regulation can facilitate competition and innovation, commercial demands can impact disproportionately on those who fall outside obvious commercial targets. Vulnerable groups, therefore, need support – be it by regulation or the more positive approach of facilitating increased access and inclusion. Therefore, we support the plans set out in section 6.7, “Promoting Access and Inclusion”.

However, we would like to see more discussion on how Ofcom can help vulnerable groups outwith the Universal Service Directive – which, we understand, is really meant to serve as a “safety net” when all else fails – so that access and inclusion are considered part of every-day living rather than a specialised adjunct.