

Access to Telecommunications for deaf people

Introduction

The only way for people to access telephone services-if they-cannot hear or speak well enough to make audio phone calls, is through a Text Relay service. This offers two way speech to text transcription services for land line and mobile phone communication between people with hearing or speech impairments and others.

Next Generation Text Relay (NGTR) is currently provided by BT and can be used on mobile devices, potentially a significant improvement on the old Text Relay. However, its provision is complex: it uses relay operators to convert between speech and text; BT is still the only provider, with all other telephone companies providing access for their customers via the BT service; the cost of the call is met or subsidised by the caller's provider.

Many Deaf British Sign Language (BSL) users need to be able to communicate in their native language and Video Relay Services (VRS) are the most appropriate form of access for this group. Video Relay Services (VRS) enable a person to make and receive telephone calls via a sign language interpreter. The Deaf person signs to the interpreter who translates BSL into English for the hearing caller and vice versa. VRS is provided by some companies and government departments on a voluntary basis. Currently it is not possible for deaf BSL callers to contact the majority of organisations across the UK through VRS, and social, personal, and calls to small businesses via VRS are not possible.

We believe that full access to the telecommunications network has the potential to transform the lives of deaf people, have a positive effect on independent living, improved mental health, better employment and career progression opportunities and enable them to participate as equal citizens in British society.

The potential users of these services are the same group who need subtitles on TV.

Legislative Environment

Recital 12 to the Citizens' Rights Directive states that: "Equivalence in disabled end-users' access to services should be guaranteed to the level available to other end-users. To this end, access should be functionally equivalent, such that disabled end users benefit from the same usability of services as other end-users, but by different means". In order for a relay service to be functionally equivalent, a conversation between a hearing and deaf person needs to proceed at normal speed with minimal interruption.

All telecom suppliers are required to provide an NGTR service fulfilling the relevant requirements in BT General Condition 15.5

Ofcom approves text relay providers and has set out minimum standards for the service.

The problem

Text relay services do not meet the needs of deaf people whose first language is British Sign Language. The solution - the provision of a Video Relay Service - does not fall

within OFCOM's mandate; this market has no agreed standards and is currently unregulated.

Take-up of Next Generation Text Relay is very low despite the significant numbers of deaf people who could benefit from it. BT data suggests that the majority of people using NGTR were previous users of the old Text Relay service and the number of new users is extremely small.

In 2016, the National Association of Deafened People and UKCoD carried out a survey of the deaf population to establish how they used the telephone. The responses received highlighted some of the key issues with the service which were echoed through BT's own mandatory survey and suggests that the lack of take up is due to the following reasons:

- Communication Providers are not engaged with NGTR nor are they marketing it to their customers.
- Whilst NGTR can now be used on the move, the mobile app is not user friendly and the "on-boarding process" is complicated and cumbersome. Many potential users are unable to access the service via mobile devices so the benefits of being able to use it 'on the move' are not being realised.
- The NGTR service, which relies on relay assistants typing each word spoken by a hearing caller, is too slow for the majority of deaf people
- BT has no business incentive to market or improve the quality of NGTR.

UKCoD would like to know what BT proposes to do to ensure the NTGR service meets the test of functional equivalence and to report back on its investigations into the use of Automated Speech Recognition and/or Captioned Telephone Relay.

We would also like BT to provide information on how it intends to improve usability of NGTR on mobile phones and reach all those who could benefit from the service.

Possible solutions

For some years automatic speech recognition has been able to handle speech from an individual once the voice recognition system has been trained to recognise his / her voice. Instead of typing, the Relay Assistant listens and repeats the speech heard. Their speech is automatically transcribed into text (captions). This system is known as Captioned Telephone Relay and should be available in the UK. To achieve this, the clause 6 (2) c in the Communications Act 2003 which mentions relay services should be changed to "a range of relay services"

Consider the models of relay provision in the USA, Sweden, Australia and New Zealand. In these countries providers use Captioned Telephone Relay to provide real time transcribed telephone conversations, as close to functional equivalence as is possible given the current technical constraints. This service greatly speeds up telephone calls with hard of hearing and deaf people whose speech can be understood by the other party.

Ofcom stated in 2012 that it would monitor the conversation speeds of the service and "work with BT who agreed that they would carry out and report on on-going tests of speech recognition technology". Ofcom also committed to "monitor developments with speech recognition software technology going forward to assess its scope to further

deliver enhancements to conversation speeds”. To the best of our knowledge this has not happened. An independent review should be commissioned.

In the USA, relay services are funded via a levy on phone bills, forming a Telecommunications Relay Fund created from a percentage of profits of the telecom companies. Sweden, Australia, and New Zealand relay services use funds paid via Government subsidy. Where government subsidies or relay funds exists, this creates a market which provides choice and quality for deaf people using relay services.

Calls to Government

Will the Government look at the case to expanding OFCOM’s remit to include the provision of Video Relay and, if necessary, change the wording in the Communications Act to reflect this?

Will the Government ask Ofcom to commission a review of relay service provision and whether it is meeting the test of functional equivalence?

Appendix 1 – Relay Services across the English speaking world

UK is one of G7 countries which does not offer the broad range of relay services that meets the needs of the different groups of deaf and hard of hearing people.

	UK	Australia	New Zealand	USA
Text relay with access to emergency services	mandatory	mandatory	mandatory	mandatory
SMS Access to emergency services	mandatory	mandatory	No	mandatory
Mobile Text relay	mandatory	mandatory	mandatory	mandatory
Functionally equivalent text relay with access to emergency services	No	Yes	Yes	Yes
VRS	voluntary	mandatory	mandatory	mandatory
VRS with Access to emergency services	No	mandatory	mandatory	mandatory
Deaf blind access to Text relay	Usability issues	Yes	Yes	Yes
Deaf blind access to functionally equivalent Text relay	No	Yes	Yes	Yes
Deaf blind access to functionally equivalent Text relay with access to emergency services.	No	Yes	Yes	Yes
Speech to speech for hearing paraplegics	No	No	Yes	Yes