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9th August 2013

Dear Chris

TEXT RELAY: BT request for Ofcom Approval of the Next Generation Text Service (NGTS)

As you know, Ofcom published a statement setting out the Decision on the introduction of Next Generation Text Relay on 17 October 2012. For compliance with General Condition 15, Communications Providers must enable access to at least one Ofcom approved Next Generation Text Relay[1] service.

BT has invested to build and supply the Next Generation Text Service (NGTS) for implementation no later than 18 April 2014. However, to ensure seamless transition from the current Text Relay to NGTS, we are applying for Ofcom's approval of the service now, in advance of NGTS implementation.

NEXT GENERATION TEXT SERVICE will:
 (a) provide facilities for the receipt and translation of voice communications into text and the conveyance of that text to the terminal of End-Users of any subscribing Communications Providers and vice versa; and ensure End-Users are able to receive call progress voice announcements in a suitable form;
 (b) provide facilities for the receipt and transmission of voice communications in parallel with text communications, allowing both channels to work in tandem to deliver near synchronous voice and text;
 (c) provide facilities for access to Emergency Organisations using the short access code 18000 ensuring such calls are prioritised and provided by a resilient network and system;
 (d) be available for lawful use by End-Users at all times, subject to proper functioning of the network and End-User disconnection for non-payment of an account;

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[1] Text Relay is *"a system which allows hearing and speech-impaired people to converse over the telephone with hearing callers by converting their speech to text and vice versa. The conversion is done by Relay Assistants working at a Relay Centre"*.

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(e) be capable of being accessed by End-Users of the service from readily available compatible terminal equipment, including textphones, Braille readers, personal computers and mobile telephones[2];

(f) not prevent End-Users from communicating with other End-users of other approved Relay Services[3];

(g) provide the option for a Customer Presentation Calling Line Identity (CLI) to allow End-Users, who because of their disabilities need to make calls using a Relay Service, to receive incoming calls via NGTS without the calling party needing to dial a prefix;

(h) insofar as reasonably practicable, allow for communication between End-Users of the service at speeds equivalent to voice communications, in line with Ofcom agreed KPIs;

(i) take measures to ensure the confidentiality of communications between End-Users of the service so that conversations, or parts of conversations, facilitated by the relay assistant are only recorded or noted where required for justifiable operational reasons such as an emergency call; cases of criminal activity and quality measurement training;

(j) comply with any directions in respect of the service which Ofcom may make from time to time[4].

As the provider of the UK's only Text Relay service, BT complies with the required quality of service measures for Text Relay and performance of the current service is published quarterly at www.textrelay.org. We are confident therefore that NGTS will meet the necessary quality of service measures[5]. As the service develops we will monitor and publish our performance and seek to exceed the minimum levels of service required.

In addition to the mandatory capability set out above, there are some further technical issues and areas of supplemental functionality relating to NGTS detailed at Annex 1.

I trust this information is sufficient to enable Ofcom's approval of NGTS. Please contact me if you have any questions or need any more information.

Yours sincerely,

Sarah Jefferson

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[2] See Annex 1

[3] where interoperable compatible and technically feasible

[4] Subject to technical feasibility and reasonable, agreed implementation/transition timescales

[5] See Annex 2

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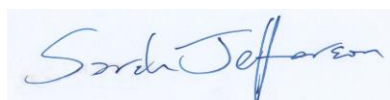Registered in England no. 1800000
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ANNEX 1: NEXT GENERATION TEXT SERVICE FUNCTIONALITY

BT is on target for the April 2014 launch of the Next Generation Text Service. The new service has new features, however for customers who don't want to change their textphones or the way they make calls the new service will work in the same way as the current Text Relay.

The Next Generation Text Service will introduce new features as follows:

Textphones

As an alternative to needing a textphone, Text-Users will be able to use an Internet connected device for calls via the Next Generation Text Service. Once the free app is installed on a computer, tablet or smartphone, the service will use an Internet connection and the phone call to create two parallel channels between the Text-User and the service. The Internet connection will be used for text while the phone call is used for voice. As with Text Relay the phone call is also used to set up the call and will be billed by the Text-User's telephone service provider.

Smartphones will need to support concurrent voice and data streaming to be compatible with Next Generation Text Service. Mobiles without this capability can still use the Next Generation Text Service when used in tandem with another internet connected device or as the text device for a separate phone.

Voice Carry Over (VCO), and Hearing Carry Over (HCO)

The Next Generation Text Service parallel channels will enable text to be typed and read at the same time as words are spoken and heard. This means that Text-Users who use their voice will be able to reply immediately without using VCO, and even while the other person's words are being relayed. Parallel channels also mean that the other person can interrupt or show they understand to the Text-User without waiting for 'GA' and taking control of the conversation, just like a voice phone call.

TextNumbers

This facility will allow Text-Users to link their home, office or mobile phone to a TextNumber. TextNumbers will have the same number of digits as standard phone numbers and there will be two groups:

- one starting with 03 for fixed home or office numbers, and
- the other starting with 07 for mobile phones.

Text-Users will be able to give their TextNumber to a bank, friends and family, or anybody who wants to call them. Callers will simply dial the TextNumber and their call will connect via the Next Generation Text Service without having to dial the 18002 prefix. When a Text-User makes a call through the service the person called will see the TextNumber, or be given this via 1471, so if they return the call they will automatically dial the TextNumber rather than the Text-User's actual network phone number. TextNumbers will work with textphones, mobiles and other compatible internet connected devices (computers, tablets, laptops etc).

The 18002 prefix will continue for use when necessary, such as making a call away from a phone number that is linked to a TextNumber.

Text-to-Text

The NGTS will continue to support direct Text-to-Text calls without the need for a relay assistant. Text-to-Text calls will be made in either exactly the same way that they are using the current Text Relay, or by using the NGTS app.

However, businesses will be able to download and install the NGTS app on their own customer service systems, allowing them to:

- talk directly to their customers without needing a relay assistant
- provide one-to-one customer service support to Text-Users
- speed up how they manage text calls.

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<u>**ANNEX 2:**</u> **OFCOM'S PERFORMANCE REQUIREMENTS FOR NEXT GENERATION TEXT RELAY** (Ofcom, 2012)

Guarantees regarding the operational effectiveness of the relay service
- The provider must ensure there are sufficient funds, facilities and staff to provide the relay service and enable it to perform properly the administrative and technical work associated with the tasks for which it has been appointed.
- The provider must ensure that staff are appropriately and adequately trained especially in the communications needs of deaf, hard of hearing, speech impaired and deafblind textphone users.
- The provider must ensure that the systems have sufficient technical resilience and back up resources to provide an uninterrupted service to the same extent as the voice telephony networks to which it is interconnected.
- The provider must ensure that users receive call progress announcements in voice for hearing users and in text for hearing impaired users.
- The provider must ensure that adequate measures are in place to ensure that the relay service is inter-operable with other approved relay services (where applicable) such that end-users are able to use the service to communicate with users of other relay services.

Accountability and transparency regarding the performance of the service
- The provider must publish and make available to Ofcom, every quarter, detailed and transparent reporting on its operation, based on the KPIs.
- The provider must publish an annual report covering compliance with these approval criteria and any related issues directed by Ofcom.
- The provider must have a complaints handling procedure in place – to be agreed by Ofcom – and ensure complaints are handled in a fair and timely manner.
- The provider must carry out customer satisfaction surveys at least every two years.
- The provider must satisfy all elements of the criteria set by Ofcom for approval on an ongoing basis. Failure to satisfy all elements, once approval has been given, may result in the withdrawal of approval by Ofcom.

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Measure	Target
Standard relay calls answered within 15 seconds	90% on average 85% per 15 minute intervals[110]
Emergency relay calls answered within 5 seconds	95%
Customers surveyed expressing dissatisfaction with the relay service	<5% customers dissatisfied
Standard relay calls abandoned[111]	<3% Standard Calls Abandoned
Emergency calls abandoned. This is in line with the standard voice service measure	<2% Emergency Calls Abandoned
Relay assistants to be monitored at least quarterly for speed of transcription, accuracy and process conformance	94% of calls handled correctly
In conversation voice to text transcription speed for standard/emergency relay calls, per call	>40 words per minute (wpm) (when the user is able to receive 40wpm or faster)
In conversation voice to text transcription speed for standard/emergency relay calls	average of at least 60 wpm averaged across calls
Average voice to text transcription accuracy	Better than 98%
Complaints relating to the relay service	Less than one complaint per 1000 calls
Total calls to be subject to a relay assistant handover	No more than 2% of total calls

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[110] This KPI demonstrates consistency of performance across each 24 hour period and limits the opportunity of long periods of poor performance being masked with one period of really good performance.

[111] Abandoned" means that the call is ended by the caller before the relay assistant is brought in.

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