Kiera Bower
Ofcom
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23 September 2013

Dear Kiera

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

I wrote to Ofcom on 9 August requesting Ofcom approval for BT's Next Generation Text Service (NGTS). We have commissioned NGTS to meet the functionality criteria set out in Ofcom's review of Relay Services statement published 17 October 2012 and are therefore confident that the service is compliant. That said, I understand that Ofcom needs to have a similar level of confidence regarding the functionality and sustainability of BT's service and I am therefore writing with the more detailed information you have requested. .

To be clear however, when requesting approval for the NGTS, BT is fulfilling the role of a Text Relay Provider and not that of a Communications Provider. In this way, BT's role as a Communications Provider is not relevant to the approval application. Should another Text Relay Provider enter the market it is entirely possible that this will be their sole activity and we therefore believe that Ofcom should treat our application in isolation of our role within the Communications Industry. This distinction is important for understanding where our remit for the NGTS extends and when it becomes the responsibility of the Communication Provider originating or terminating the call to meet the General Condition 15 obligations.

You state in your letter of 3 September that:
> "the application must provide information on how compliance will be met.
> More generally, BT should provide details on how the service will work, including
> technical specifications, to provide assurances that the requirements of the GC and
> approval criteria can be met. For example, the instructions or specifications given by
> BT to the contractor commissioned to build the service may be relevant in
> demonstrating compliance with GC15.5."

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The development of the NGTS is the result of numerous discussions with the supplier, DSPG. The Invitation to Tender (ITT) is not a technical document but something that is mainly conceptual. We do not believe therefore that the ITT documentation will provide any additional clarity and it is not included in our application for approval.

You state in your letter of 3 September that:

> *"The statement made clear that the wording of GC15.5(d) acknowledged that there may be instances where the relay service may not be provided by a Communication Provider, for example, if an end user has not paid their bills (in which case there are circumstances in which the Communication Provider can legitimately refuse to provide a service to that user) or if there is a catastrophic failure of the telecommunications system. The statement also explained that irrespective of this, existing provisions in the GCs ensure that emergency calls can be made even if bills have not been paid. The application states that the service will "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". Please confirm that BT intends to comply with the intention of the GC, as explained above and in the statement, particularly as the application makes no reference to emergency calls remaining covered."*

This is one area where the distinction between BT as a Text Relay Provider and a Communications Provider comes into play.   We can confirm that NGTS will be available for use at all times, subject to proper functioning of the network, however we do not have any control over whether or not an end-user is able to make a call using the NGTS. This is an issue for the Originating Communications Provider (who may be an Internet Service Provider) rather than one for the NGTS. The NGTS will connect all calls presented to it by Communications Providers. However, the NGTS has no billing relationship with the end-user and no access to the Communications Providers' billing systems so the NGTS cannot check an individual end-user's billing status. The Communication Provider originating the call is responsible for controlling the calls that their customers are able to make. However, the NGTS will honour any appropriate call barring flags.

Within the phone network 18000 should have the same priority as 999 and be routed as such, however we can only confirm that this is the case within BT's own network.

BT as a Communications Provider provides services to end-users in compliance with General Conditions 3 and 13.1 and makes no distinction between a customer using Text Relay and one who does not.   We cannot guarantee this for other Communications Providers and believe this is an on-going compliance issue for Ofcom more generally.

You state in your letter of 3 September that:

> *"GC15.5(g) requires the relay service to "provide facilities to allow End-Users, who because of their disabilities need to make calls using a Relay Service, to receive incoming calls via the Relay Service, without the calling party needing to dial a prefix".*
> *"Please provide more clarity about how TextNumber will work. For example, it would be*

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useful to specify the process for making outgoing calls. We currently assume that this will remain as it is today, e.g. in all cases the relay user will have to dial the 18001 prefix, but it would be useful to set this out in the application."

TextNumbers
For clarity the 18002 prefix will continue to work with the new TextNumbers providing an alternative way of calling a text-user.

Changes to CP's networks
TextNumbers are design to be a centrally managed network independent solution that only requires CPs to make sure that calls to TextNumbers route to the NGTS. Once set up by the CPs TextNumbers will be available from all phone networks that are required to provide access to text relay services.

As with the other calls made through NGTS it's the originating CP who will be charged for its customer's use of the NGTS.

Setting up a TextNumber
To link a TextNumber to their phone number a text-user will simply dial the NGTS helpline number and select the appropriate option. An automated system will allocate the next free TextNumber and will tell the text-user, in text, the TextNumber that's linked to their phone number. If the text-user repeats the process, the system will repeat the previously allocated TextNumber.

Calling a TextNumber
To make a call to a text-user who has a TextNumber linked to their phone number or mobile the caller simply dials the TextNumber. NGTS handles the call in the same way as an 18002 call.

Unallocated TextNumber
If a caller dials an unallocated TextNumber they will hear Number Unobtainable (NU) tone from the NGTS.

Making a call from a phone number linked to a TextNumber
When a text-user makes a call from a phone number linked to a TextNumber that TextNumber replaces the Presentation CLI, this enables services like Call Return to route automatically via NGTS. If text-user withholds their phone number, either permanently or by using 141, the TextNumber will be withheld.

This doesn't impact emergency calls, the standard network CLI is used by location services. However, the text relay assistant will see the TextNumber and can advise the emergency service to use the TextNumber if they need to call the text-user back.

Phonebooks

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End-user will still be able to request, through their CP, an additional line in the phonebook showing their phone number with the 18002 prefix. While TextNumbers will be useful to friends and family they are designed to overcome the problems with businesses not supporting the 18002 prefix. We feel that not having a TextNumber in the phonebook is not a disadvantage because businesses will ask their customers for a contact numbers rather than looking it up in the phonebook.

All customers of all Comms Providers have the option of an additional Special Phone Book Entries (SPBE) at £26.12/quarter (exc VAT), this entry can be the TextNumber and does not affect the customer's entitlement to their standard Phone Book Entry which is free to BT customers but may be chargeable from other suppliers.

Things you need to know about TextNumbers
- The 18002 prefix will still work when a TextNumber is linked to a phone number
- If a phone number is not linked to a TextNumber the 18002 prefix can still be used
- Specific TextNumbers cannot be requested
- TextNumbers cannot be transfer away (ported) from the NGTS
- The link between a TextNumber and phone number will not be shared with other parties
- No customer details are required to set up a TextNumber
- If a phone number that is linked to a TextNumber does not make or receive calls through NGTS for a period of one year the TextNumber with be withdrawn
- The system will link geographic phone numbers to TextNumbers starting 03 and mobile phone numbers to TextNumbers starting 07.
- TextNumbers will be usable within 5 minutes of the initial request

You state in your letter of 3 September that:
> *"The provider must ensure that in its NGTR service calls to the emergency services are prioritised and provided by a resilient network and system"*
> *"BT's application provides no reference to how you plan to have sufficient technical resilience. Please provide further detail. For example, will it be the same arrangements as for the current text relay service? 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 application provides no reference to how you plan to have sufficient technical resilience. Please provide further detail."*

We will use independent text nodes situated on geographically separate sites with each text node having multiple connections into BT's interconnected network This is the same as the current Text Relay service.

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Parallel text

NGTS enables text-users to move away from dedicate textphones to Internet connected devices such as computers, laptops, tablets, and smartphones by introducing the concept of a phone call with a parallel text channel.

To use the new parallel text the text-user needs a standard fixed, mobile, or VoIP[1] phone and an Internet connected device running a NGTS app downloaded from the NGTS website or from the device's app store.

Once the app is set up, the NGTS will create a parallel text channel when a call is made or received by a phone number that's associated with the app. The parallel text channel carries the text conversation while the phone call provides a voice connection between both end-users or relay if connected.

As with the current Text Relay it's the calling phone line that's charged for the phone call and the owning CP that's charged the appropriate Text Relay ppm charge.

Setting up for parallel channels

Depending on the device, the end-user will either download the app from the NGTS website or from the device's app store e.g. Google's Play Store or Apple's App Store.
The text-user establishes the association between the app and a phone number by making an 18001 call from the phone as instructed on the app's screen.

Making a parallel text call

To make a call the text-user opens on the app and on the associated phone dials 18001 followed by the destination.

Answering a parallel text call

An incoming call will ring the phone, flash lights, trigger a local pager, etc. When the phone rings, the text-user opens the app. If the call has not come through NGTS, the app will not show the call. Assuming the call has come though NGTS the text-user can answer the call by clicking on the app, or by lifting the phone handset and clicking on the app if they want to use voice.

Things you need to know
- From time to time you might be asked to rerun the setup process for specific phone numbers
- More than one phone number can be associated with an app
- The associated phone numbers can be exported to another app
- The same associated phone numbers can be in apps on two or more device
- The associated phone number will be available within 5 minutes of being set up

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[1] Assuming that the VoIP service provider has enabled access to NGTS for their customers

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- The app can connect to the Internet using broadband, Wi-fi, or mobile data
- The phone line making the call is charged for the call

You state in your letter of 3 September that:

> ""*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 application makes no reference to ensuring sufficient funds, facilities and staff to operate the relay service to ensure that the service is capable of providing access for disabled end users to voice communications. Please provide further detail.*"

BT has been the only UK provider of Text Relay since its inception in 1991. We believe our proven record of provision and performance should satisfy Ofcom that we are able to ensure sufficient funds, facilities and staff to operate the relay service. Details of BT's Text Relay performance are available at www.textrelay.org. Additional information about BT is included in our annual report, here:

http://www.btplc.com/Sharesandperformance/Annualreportandreview/pdf/2013_BT_Annual_Report_smart.pdf

We will staff NGTS to ensure we meet the PCA and relevant KPIs. We will also ensure there is sufficient physical infrastructure to accommodate staff, technical systems and expansion should this become necessary. Established processes exist within BT Customer Service (the BT business unit operating the current Text Relay and the NGTS delivery programme) to ensure finance is available for expansion and development when it is required.

You state in your letter of 3 September that:

> " "*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 application provides insufficient detail on staff training to ensure that an NGTR service is capable of meeting the complex and varied requirements of hearing and/or speech impaired end users. Please provide further detail.*"

While deaf awareness training raises staff understanding of some of the issues deaf, hard of hearing, speech impaired and deafblind people face, we don't believe it is entirely relevant to the communication needs for people using Text Relay. Our training programme focusses on customer care instead and contains a variety of modules designed to equip our people with the right skills to communicate effectively with all Text Relay users, including those who may have never experienced a relay call before. It also trains them to respond appropriately because they know how the system works and can easily anticipate the caller's needs.

Relay Assistants begin with an intensive training programme with the introduction of some test calls. Once completed, they move on to taking live calls, but e don't introduce emergency calls during this initial phase of the training so that our new assistants can gain

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experience and confidence.. Assistants have additional training later in the programme for emergency call handling once they have reached the desired operational standard. We believe this approach develops effective and confident relay assistants and their performance and the quality of service they provide is monitored throughout their time in the relay centre.

Ofcom may also be interested to know that all of our BT relay assistants have had deaf awareness training.

You state in your letter of 3 September that:
> *"Measurement of accuracy and speed and staff monitoring: The KPIs require "Relay assistants to be monitored at least quarterly for speed of transcription, accuracy and process conformance" and for "Average voice to text transcription accuracy" and "In conversation voice to text transcription speed for standard/emergency relay calls" to meet certain standards. We consider that the application provides insufficient detail on how the KPIs will be measured and how staff will be monitored. As you are aware from our discussions with you on this topic, we consider that how speed and accuracy is measured should be transparent and that monitoring and measurement should be conducted on real calls (either live or recorded) not test calls.*
> *"Please provide further detail of how these KPIs will be measured and how staff will be monitored."*

We can confirm that we carry out monitoring and quality of service activity with all relay assistants at least quarterly in compliance with the current KPIs. This will continue for the NGTS. However, we are currently reviewing how to carry out even more effective performance monitoring. The NGTS build allows us some scope to develop new ways to monitor staff behaviours, accuracy and conversation speed and as soon as this is ready we will be trialling a new method for assessing and capturing this in real, live calls. Once completed, we will share this information with Ofcom and publish it on the forthcoming NGTS website.

Your letter of 3 September states:
> *" "The provider must publish an annual report covering compliance with these approval criteria and any related issues directed by Ofcom".*
> *"The application provides limited information on reporting. Please provide further detail of when and where the annual report will be published and when customer satisfaction monitoring will be carried out and included in the report."*

As the current Text Relay Provider we already publish a quarterly report at www.textrelay.org. A new website for the NGTS will replace www.textrelay.org when the service goes live. We will publish the new URL when this happens. We will also publish the annual report for the performance of the NGTS on the replacement website but do not have any date in place for when this will happen. We will continue to published the Quarterly Report to the new website. The annual report will be completed and published within 12

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months of the start date for NGTS and not later than end-April 2015.

You state in your letter of 3 September that:
> *"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 application makes no reference to BT's <u>complaint handling procedure</u> for the relay service. Please provide details of the complaints handling procedure and how complaints will be handled.*

As a Communications Provider, BT is compliant with General Condition 14.4 requiring Communications Providers to have and comply with procedures that conform to the Ofcom Approved Code of Practice for Complaints Handling when handling Complaints made by Domestic and Small Business Customers about its Public Electronic Communications Services. This is available here:
http://www.btplc.com/Thegroup/RegulatoryandPublicaffairs/Codeofpractice/CustomerComplaintsCode/index.htm

We expect all Communications Providers to operate similarly compliant complaints processes for their own customers.

You state in your letter of 3 September that:
> *"The provider must carry out customer satisfaction surveys at least every two years".*
> *The application provides no mention of customer satisfaction monitoring. Please provide further detail including when and how customer satisfaction will be carried out.*

We believed that Ofcom were initially conducting customer satisfaction research for both the current Text Relay service and for the NGTS following its launch. If our understanding is correct, we plan to review Ofcom's 'before and after' research before commissioning anything more. This way we can ensure that future research takes account of learning from previous rounds whilst still allowing cross-reference as we believe it is vital that research is meaningful and if possible, comparable. We therefore don't have any current dates for customer satisfaction research and do not anticipate this will change for the initial 12 months following launch of the NGTS. We will, of course, work with Ofcom and stakeholders to build suitable questions for end-user research candidates and carry out satisfaction monitoring before April 2016.

You state in your letter of September that:
> *"It may also be useful for the application to make reference to your intention to test the service."*

We test every part of the service build before the implementation programme moves forward to the next stage. User testing is scheduled for March 2014 once the service build has completed.
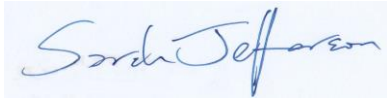
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Please contact me if you have any questions or need any more information.

Yours sincerely,

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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.

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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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