

14 March 2020

## **Proposals to implement the new European Electronic Communications Code: consultation response from Natalya Dell**

Dear OfCom,

I hope this brief consultation response can still be accepted. I had not realised the deadline was so soon as it was not widely promoted in deaf spaces I inhabit until very close to the deadline.

My name is Natalya Dell. I am a partially deaf, partially fluent BSL user with additional physical impairments which affect my ability to reliably produce BSL myself.

*Question 14: Do you agree with our proposal to mandate emergency video relay for emergency communications to be accessed by end-users who use BSL?*

### **USER EXPERIENCE**

I support the use of BSL999 from the user perspective as proposed in the videos at <https://www.ofcom.org.uk/consultations-and-statements/category-1/proposals-to-implement-new-eecc/emergency-video-relay-videos> especially if it allows voice carry over (VCO) mode. My signing production is limited by physical impairments but I speak well and my reception of BSL is good enough for use in medical/emergency contexts.

I do not wish to use 18000 via BT's Relay UK service (which by the way is a silly and meaningless name to deaf and hearing people alike). I do not accept the legal liability risk because the quality of text-relaying by their operators is slow, inaccurate and unreliable. BT are well aware of my views but nothing changes. The new app is buggy and it takes months for BT to fix them if they bother at all. I refuse to use the new app.

During #COVID19 I have been considering my options for accessing NHS111, and will probably use Interpreter Now BSL video relay service in voice carry over mode. I simply cannot trust Relay UK for anything basic (I've had text-relay operators fabricate content in simple appointment making calls), and healthcare questions/emergencies are more than basic.

BSL/English interpreters have more training in quick and accurate relaying of all the key information. Text-relay operators do not, they can't type quickly enough and their content is often incomplete and riddled with typos.

*Question 15: Do you agree with our proposal that the obligation to provide emergency video relay free to end-users should be imposed on regulated firms that provide internet access services or number-based interpersonal communications services?*

### **FUNDING/PROVISION OF BSL999**

I support the response made by Andrews and Arnold Ltd about it not being appropriate to expect Telecommunications Providers to fund and provide the service or subscribe to an existing service - especially with the exclusion of some VOIP providers - which is a silly distinction. This is similar to the model used for Relay UK and it's disastrous.

I believe that as 999 is a Statutory Service that BSL999 should also be provided by the state with Telco/ISP etc providers being required to do everything in their power to enable and prioritise BSL999 video calls through their systems.

Many thanks,

Natalya Dell