

Your response

Question	Your response
<p>Question 1: Do you agree with our proposal that regulated providers should be required to either provide emergency video relay or contract for it to be provided?</p>	<p>No. The proposed scope including internet access providers is overly broad. Pure Internet connectivity does not allow voice access to emergency services. Requiring those who do not currently provide access to emergency services to provide one for BSL users is not proportionate. A person cannot expect to be able to contact the emergency services if they have not obtained an appropriate set of services. An appropriate obligation would be to prohibit an IAS blocking access to the endpoints used for the relay service, providing such endpoints are disclosed on an ofcom published list.</p> <p>In the consultation document an example is given of an end user being away from home, but wanting to use the relay service over a fixed data connection, if the site does not have a telephone service then a regular emergency call cannot be placed, therefore the example suggests that the proposal is for video relay to be available in more cases than access to voice 999 is available. Further more it is likely that the end user in this example would be using a mobile phone, which has its own data connection and further is clearly attached to a number based service, so would have the relay service available over its own data connection, the proposed mobile apps could switch to using mobile data in such circumstances.</p>
<p>Question 2: Do you agree that the Approval Criteria should contain a requirement obliging suppliers of approved emergency video relay services to include a clause about fair, reasonable and non-discriminatory terms in</p>	<p>Yes providers fo relay services should be required to have fair contract terms.</p>

any contract with any Regulated Provider or wholesaler?	
Question 3: Do you agree with our proposal that data used for emergency video relay should be zero-rated?	Yes provided technically feasible took account of the existing systems used by a provider and not what could be done if they changed their systems.
Question 4: Do you agree with our proposal that end-users should not be required to register to access or use emergency video relay?	Avoding passwords is a good idea. But users could be required to setup the application from a connection associated with an in scope provider. In an emergency users are unlikely to download an app, and assuming a mobile phone is the primary target device they can be identified using the SIM identity or phone number. Once a client installation had be identified once that identity could be used regardless of the underlying connection when the call is initiated, allowing IAS to be removed from scope.