

UKCoD is responding to this consultation, following discussion amongst members of its Deaf Access to Communications group.

UKCoD welcomes the fact that Ofcom have received an application for approval of an NGTR service as this suggests that a very long process to improve the current text relay provision is almost complete and users will soon be able to judge for themselves the improvements that are promised.

UKCoD recognises that the application is being made against the criteria and KPIs outlined in Ofcom's statement of October 2012. We will continue to work with both Ofcom and any providers to ensure that mandated service(s) are kept up to date with technological developments, and do not stagnate. We are keen to have a common view of the methodology used to assess performance against the KPIs, particularly how speed and accuracy are measured. This will enable us to compare different transcription methods and technologies as they develop, monitor the impact of NGTR in relation to conversations speeds and explore the impact of changing accuracy levels according to user need and experience. A common understanding of all the available evidence would be welcomed and ultimately lead to ongoing improvements in the user experience. We look forward to working with Ofcom on this and will alert interested parties if we are aware of technical developments that could see NGTR develop further.

We recognise that approval of a service is a first step in this process.

Ofcom propose to approve BT's NGTR service for the purposes of General Condition 15. We note the correspondence and information that has been made public by BT and Ofcom's reference to the undertakings given by BT in confidence.

We welcome Ofcom's recognition that any approval will be conditional on the service demonstrating that it is able to meet the relevant criteria on an ongoing basis and the importance of monitoring the actual service against the criteria.

We note that BT's state their service will provide for transmission and receipt of voice communications in parallel with text communications, and that it will be capable of being accessed by readily available equipment, such as mobiles. Some of this functionality will be available via an app. It is not clear from the consultation documents and related correspondence what platforms this app will be available on, in what timescale. UKCoD's understanding is that it will be released first on the android platform and that others will follow. If users are not able to access an app for their chosen device on or near launch of the service there is a risk they will become disillusioned with NGTR, so understanding the timescales for subsequent releases will be important.

With this in mind, UKCoD supports Ofcom in the judgment it has reached, namely that the proposed service meets and should be capable of ongoing compliance with the approval criteria.

NGTR promises a number of new features and it will be important to understand the user experience of these. We are particularly keen to learn from users about the experience of parallel voice and text and the impact this has on the general flow of conversation, what is meant by 'near synchronous voice and text', the flexibility the app will provide on a variety of devices, and how businesses and organisations can integrate NGTR into their communications.