

Your response

Question	Your response
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?	Yes I agree, this service is vital to Deaf BSL users who wish to communicate using British Sign Language as this is their first or preferred language. Having spoken to our CP clients who use our VRS service to ensure Deaf BSL users can contact them, they too agree that this service should be provided and paid for by regulated communication providers, to enable Deaf people to call 999 if they or another person need assistance.
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 any contract with any Regulated Provider or wholesaler?	Yes
Question 3: Do you agree with our proposal that data used for emergency video relay should be zero-rated?	Yes and having spoken to CP's we work with they also have advised that they can isolate and zero rate usage via certain apps on mobile devices already. So if a standalone app was built for VRS 999 then they could zero rate any usage.
Question 4: Do you agree with our proposal that end-users should not be required to	Yes, I think it is important that Deaf callers can be called back in case the call disconnects etc. For this to be possible they need to register for

register to access or use emergency video relay?

the first time they download the app only. We would suggest for onward billing, reporting, identification of the CP and also the ability to call the Deaf caller back, that the app is downloaded as soon as it is advertised as available, so they have it ready as and when they need it.

[X]

Therefore If Ofcom want the 999 service to have the ability to call a Deaf caller back (which we think is important) the app needs to capture their email address on initial registration only.

If Ofcom do not want users to register at all for the app and therefore not enter any identifying information such as their mobile number to know which CP to recharge, then the only other option is to create a monthly levy on all CP's for the service which would be the cost of all VRS calls/admin recharged to CP's based on a metric such as turnover or customer numbers etc.