Omnitor

2010-11-26

Response from Omnitor on BoR (10)47

Public consultation on

Electronic communications services: Ensuring equivalence in access and choice for disabled end-users

The answers are submitted by Omnitor, a Swedish private company devoted to improvement of communication for these user groups, by means of technical development, service provision, standardization, project performance, and information provision about the conditions in this area.

Omnitor is a partner in the REACH112 project, partly funded by the EU CIP PSP programme. The responses relate closely to the topics of that project. The comments are though not to be viewed as comments by the project, since they have not passed any review by project partners.

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The main topic of this response is the needs of communication in other modes and media than voice for people with communications related disabilities.

A central topic is the Total Conversation service, defined by the USO to be part of public teleservices by the Whereas statement 13 in the introduction of amendment directive 2009/136/EU with these words:
"

Publicly available telephone services also include means of communication specifically intended for disabled end-users using text relay or total conversation services.
"

Total conversation was originally defined by the ITU in ITU-T F.703 in order to bring the Design For All concept into telephony services. It is a minor extension on the videophone concept by adding a standardised real-time text medium. By that, calls with total conversation can be handled in a consistent way in any mix of real-time text, video and audio. That benefits users with disabilities who then can use any mix of voice, text, sign language, lip reading, face expressions, showing things etc, that the actual call situation requires.

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Supported by sign language relay services, text relay services, captioned telephony relay services and speech relay services, the availability of total conversation is intended to provide a good step towards equivalence in access to publicly available telephone services.

This response concentrates on comments related to the fact that total conversation is now included among the publicly available telephone services to be provided according to the USO. This topic is best covered by concentrating on a response to Question 2

Consultation Question 2: Do you agree that the factors listed in sections 3.1.1 and 3.1.2 are important to consider when assessing equivalent **access**? Are there other factors which should be considered? Are some factors more important than others?

Response:

The factors described in 3.1.1 and 3.1.2 are important to consider. The description below indicates that one very important factor for equivalent access is to be able to use the modes of communication that suits a person with communication related disabilities best for each call. The next important factor is that the goal shall be global interoperability. Voice telephone users are not limited in whom they may call globally. The same global interoperability must be the goal of the total conversation implementations that will take effect now that total conversation is included among the publicly available telephone services in the USO.

In order to secure that global interoperability, standards describing Total Conversation should be published in the Official Journal list of standards for encouraging harmonisation according to Article 17 of the Framework directive. With such standards in place, a wise distribution of the implementation can be made between obligations on providers and other actions by MS.

Interpretation of the term "equivalent access".

USD Articles 7.1 and 23a requires that people with disabilities " have access to electronic communications services **equivalent** to that enjoyed by the majority of end-users;"
It is essential for the successful implementation of the USD for people with disabilities that the term "equivalent access" gets an agreed interpretation in line with this directive and also with the requirements in the UN Convention on the Rights of People with Disabilities.
This is a deduction that leads to an interpretation of "equivalent access" for people who have specific benefit of Total Conversation.

Important characteristics of regular voice telephony are:
- **Global interoperability in addressing:** Anyone with access to voice telephony can call anybody else globally by just dialling the other person's number.

- **Global interoperability in conversation transmission.** When the call is established, a voice conversation in real time can take place, regardless of the make and technology of the two parties' equipment and services.

- **Interoperability with mobile telephony.** The users of telephony at a fixed location can exchange calls also with all users of mobile telephony.

- **Emergency service access.** The device and service used for everyday calls can also be used for emergency calls.

Important characteristics of accessible conversational services suitable for people with disabilities are:

- **Voice replacements and complements.** People with communications related disabilities need to replace or complement voice communication with communication in modes and media that suits their capabilities.

- **Real-time text.** Some may find it most suitable to have access to text conversation in real-time, where characters are transmitted as soon as they are typed so that the communication parties can be in synchronism with their thoughts, just as in a voice call.

- **Video.** Some may find it most suitable to have access to video communication for use of sign language communication.

- **Video.** Some may find it most suitable to have access to video communication for lip reading, recognition or for showing things, features or feelings.

- **Wide band audio.** Traditional telephony has far from ideal audio characteristics. High audio frequencies are cut off, so that users can barely hear the difference between an "s" and an "f". By use of wide band audio, this situation can be approved, to great benefit for many users with hearing impairments.

- **Specific combination of media for each call situation.** Each call may call for a specific combination of most beneficial media and modes of communication. Access to all three conversational media of real-time text, video and audio in the same call provides this opportunity in an uncomplicated fashion, and allows the users to mix and match media as most suitable for the moment.

- **Total Conversation.** A service providing the three media together has been defined and named Total Conversation. It was first defined by the International Telecommunications Union, ITU and has then been recognized by other organizations, and now EU by inclusion in the Whereas statement 13 in the amended USO.

- **Total Conversation** is best implemented in Broadband Networks, where the video medium can be assigned sufficient bandwidth for suitable quality for sign language and lip-reading conversation.

- **Alerting in other modes than audio.** The audible ring signal for incoming call is not sufficient for many situations with people with disabilities. Other alternaives need to be available, such as tactile vibrating alerters and visual flashing alerters.

- **Relay Services** are defined and implemented providing the function of translating between different modes and media, in order to fulfill the need for people with disabilities to have calls with other modes and media, mainly all users of voice telephony.

- **Relay services** are defined for sign language users, for text users, for users of weak speech or speech that is hard to understand, for speech users with support of captions, for deafblind users mixing real-time text and voice or sign language communication.

- **Emergency service access** for people with disabilities can be provided either directly or with relay services involved, depending on where competence is found for the mode and medium that the user needs to use.

Resulting interpretation of the term "Equivalent access"

Considering the characteristics of voice telephone services, and accessible conversational services, it can be deducted that the term "Equivalent access" used in the USD shall be interpreted as:

- **Real-time text.** People who need to type or read for their communication must be provided with real-time text in the service. Only by this, the service is equivalent in that it carries the conversational media of choice for text users.

- **Video.** People who need to use sign language, lip reading or other visual means for their communication must be provided with video communication in their service. Only by this the service is equivalent in that it carries the conversational media of choice for these users.

- **Relay services.** People who have no, or limited, use of voice communication directly, must be provided with relay services suitable for conversion between voice and their way of communicating. Only by this, the service is equivalent in the sense that it can be used for calls with the enormous population of voice telephone users.

- **Total Conversation access.** People have varying needs and capabilities which may vary from call to call. Therefore the needs must be met by Total Conversation services offering both video, real-time text and voice simultaneously. Only by this, the service will provide the global interoperability between different users needed.

- **Applying standards for Total Conversation.** Implementation of Total Conversation need to follow established standards so that it can be used for calls to other total conversation users at other providers as well as relay services and emergency services. Only by this, the services will provide equivalent access in that they can provide global interoperability in media.

- **Addressing through the global International Number System.** The Total Conversation implementations need to be able to use phone numbers according to the international phone number system. Only by that they can set up calls with all voice phones to fulfill the need for global interoperability in addressing.

- **Emergency service access.** People need to be offered to have emergency service calls to the European Emergency number 112, using the media and modes and equipment they use for everyday communication, as well as invocation of a possible relay service they usually might have. Only by that the emergency service will comply with the emergency access requirements of the new USD.