



BT Response – ACCESS AND INCLUSION Digital Communications for all

Executive Summary

BT welcomes the objectives of this wider-ranging consultation document in undertaking a comprehensive review of the various aspects of communications services from an inclusion perspective and seeking to identify those areas where policy measures should be prioritised. BT supports these intentions and believes it is not only important to identify the priority areas but also to differentiate between those areas requiring regulatory intervention and those that can and should be left to industry to deliver as responsible corporate citizens. It is also important to be clear on how any extension of provision beyond what can be delivered commercially, is to be funded.

BT agrees with Ofcom that broadband is a priority area. Increased access to broadband can only improve inclusion, well-being and sense of community. As more and more online services are developed, customers, and in particular those with disabilities, can engage in activities that might otherwise be more difficult, without the need to leave the home,

We share the Government's vision as set out in the Digital Britain Review and we support the objective of universal broadband availability across the UK, subject to appropriate definitions and a suitable funding mechanism. With this underlying network in place, service providers can compete to provide affordable, competitive services from which customers can choose those that best meet their personal needs. Promoting broadband take-up is another vital objective and it is important to address the true barriers to adoption with imagination. For example, enabling digital television receivers to be connected to broadband encourages take-up by customers who do currently not use, or want to use, computers.

As we move into a broadband-enabled digital age, it is clear that the current Universal Service Obligation (USO) is outdated and BT welcomes Ofcom's commitment to carrying out an evaluation of both the effectiveness and burden of its provision during 2009. BT urges Ofcom to use this as an opportunity to ensure that reform is appropriate both to consumer need and today's substantially altered communications environment. BT believes that provision should be only required where the market is deemed not to deliver and then, on a pan-industry basis. Where USO is the only appropriate regulatory mechanism, there should be a shared industry fund (or funds) to help to guarantee that valuable services continue to be provided in the fairest and most appropriate way to continue to meet changing consumer needs.

It is important that any remaining or new obligations should be shared across industry, by both fixed and mobile operators. BT therefore supports Ofcom's intention to allow emergency calls to be made from any mobile handset over any

UK network and urges that no further delay be permitted in implementing this facility. Much more must still be done however to ensure handset accessibility and increased network coverage moving forward. For example, the BT-supported emergencySMS service to be trialled this year will provide another mechanism for customers whose disability makes text their preferred method for contacting emergency services.

Overall, BT welcomes Ofcom's interest and engagement in ensuring that society as a whole is able to fully benefit from the variety of available communications products and services. BT makes a considerable investment in developing accessible and inclusive communications services for all, rather than creating specialist products that are of benefit to only a small proportion of the population. BT believes that everyone should be able to communicate in the manner they choose and is committed to working with consumers to help make this a reality for all, ensuring that everyone is able to understand, interact and benefit from everything that technology now has to offer.

Introduction

1. Using the assessment criteria of geographic availability, take up and effective use of services Ofcom has determined that the key areas most in need of further consideration of potential regulatory reform are broadband availability and take-up, “999 mobile roaming”, services for disabled people, the Universal Service Obligation (USO) and media literacy; and within these key areas, set out an assumption that new regulatory measures may be needed to best fulfil customer need. Ofcom therefore proposes to concentrate their immediate policy focus on improved access to broadband and the increase in broadband take-up by disadvantaged groups, the introduction of 999 mobile roaming, and introducing improved relay services for the hearing-impaired.
2. Broadband is already widely available throughout the UK on very competitive, affordable terms and, subject to suitable definitions and funding being in place, BT supports the principle of a universal 2Mbps commitment. Moves to further increase take up are also to be welcomed. BT is, for example, supportive of the Government proposal that all hardware used for receiving digital television signals also contain an Ethernet port for easy connection to broadband services and BT would recommend that for such equipment to be awarded the Digital Switchover Certification Mark in future this must become a minimum requirement.
3. The decision to enable the facility that will allow mobile users to ‘camp’ on the network of another provider in order to make an emergency call when in a ‘home network’ black-spot is a welcome improvement as the current scenario that allows a caller with a European mobile roaming within the UK better access to 112 services than a UK resident is clearly ludicrous and arguably, unsustainable. Whilst it is undeniable that camping is an excellent step in the right direction, enabling network roaming would enable the CLI to be passed during the making of an emergency call in addition to the originating cell information that camping allows and in so doing, making caller identification information as well as location to be immediately available – even on silent calls. Much more must also be done in order to make mobile services accessible to all. Handsets, in the main, do not offer accessibility to those in society with dexterity or visual impairment and Ofcom needs to exert some of its energies in ensuring that all providers take reasonable measures to make their services available to all customers including the older and disabled people within our society.
4. Ofcom’s long awaited decision to conduct a review of the way in which Universal Service is delivered within the UK is extremely welcome and BT looks forward to forthcoming discussions with Ofcom to determine how the obligations of the Universal Service Directive might best be met in the future. BT believes that for the review to be successful there must be not only reform of the existing regulation, based on the fundamental principles underpinning

the original intent of the USO, but also the desire to address the lack of innovation and a move toward future proofing whatever is implemented in its place financed by a shared fund contributed to by industry as a whole.

5. In terms of the views expressed within the consultation that relate to potential for improvement to relay services in particular, BT is concerned by Ofcom's noticeably traditional vision of what 'improvement' might be as this does nothing to stimulate innovation in the provision of communication services for the way in which people live their lives now and in the near future and the functionality and products that are, or might be, available to them. Furthermore, the greater concentration that is placed on delivery of niche services into restricted markets perpetuates the theory that accessibility issues extend only to specific deliverables and then for delivery only by the providers of Universal Service.
6. Regulation ensures that those supplying services to consumers provide at least a minimum requirement to meet each obligation. The business reality however, particularly when applied to Universal Service, creates a tension within the offering itself, transforming the service floor required by the regulation into a service ceiling above which any enhancement carries increased risk of inability to recover a reasonable return, market distortion and the potential for abuse. Funding mechanisms, when administered across the widest base of industry players, may go some way to mitigate such risks of complete commercial failure, however the optimal solution is to remove regulation where markets are competitively sustainable and apply the remaining regulation symmetrically so that all providers of services compete on product functionality and price policies to best meet customer need and gain market share.
7. There are, without doubt, those consumers who are more at ease using the traditional communication services of fixed lines and textphones however these individuals are in decline and investment in enhanced services that many may never even use is not the best route to achieve improved inclusion. Text messaging, real time SMS, Instant Messenger, Spivox, email and webcam services all offer the opportunity for individuals to communicate in a variety of ways to best meet their personal need without any direct targeting at specific disability or social group. All function well and are available commercially within existing competitive markets. If Ofcom is to achieve its goal it must first shake off these tired preconceptions of legacy telecommunications services and fully embrace the 21st Century complete with everything it has to offer an inclusive and included society.

Improved access to broadband internet

8. BT has been at the forefront of activity on a wide range of issues under the heading of Corporate Social Responsibility for a long time – covering issues such as diversity, inclusiveness, ethical trading, environmental awareness and education. We are proud of our record and of the many awards we have received from independent bodies in recognition of those achievements. For example, we won Business in the Community's prestigious 'Company of the Year' award in 2007 for our positive impact on society and for the last 8 years we have been rated number one in the telecommunications sector in the Dow Jones Global Sustainability index. One of the issues most discussed in the broader corporate responsibility area is of 'digital inclusion', by which we mean the question of whether or not all sectors of society are able to use digital services and, therefore, participate in and derive benefit from modern communications possibilities.
9. There are three strands to our digital inclusion strategy:
 - connectivity – giving more people access to communications technology;
 - content – developing online content that benefits communities and small businesses; and
 - capability – helping people to develop skills and use the technology.
10. BT's activity includes EverybodyOnline a programme part funded by BT and managed by Citizens Online, which has been in operation since 2002. There are currently 6 active projects in England and Scotland and 5 in Northern Ireland. 10 of the earlier projects are now being run by local organisations, 3 of these being in Wales where they have now become part of the Welsh Assembly's Community First programme. The European Commission have included a best practice case study highlighting the achievements of Everybody Online projects in their European e-Inclusion Initiative¹.
11. The activities described above are focussed on increasing broadband take-up. There is also the issue of broadband availability, a key focus in the Government's Digital Britain Review. Currently, broadband availability is around 99% population at a minimum of 256kbps and Ofcom's own analysis shows that around 85% of the population could have 2Mbps today with no specific action. BT supports the DBR objective of universal broadband availability across the UK at 2Mbps, subject to appropriate definitions and a suitable funding mechanism.
12. Delivery of broadband at speeds of 2Mbps and above enables the increased provision of entertainment services to digital television receiving equipment and true convergence of the previously isolated equipment of television and computing monitors. The Canvas project in which BT is engaged as a

¹ http://www.citizensonline.org.uk/everybody_online

founding partner with BBC and ITV will offer a new motivation (enhanced TV services) to take up broadband, particularly for households without a PC. Innovations of this nature have the potential to increase broadband take-up from 60 percent of UK households to well over 90 percent.

13. Given the rapid rise of mobile broadband, BT considers it imperative that Ofcom lose no more time in implementing a code of practice, or something equally protective of consumers, for the mobile sector.
14. Additionally, as broadband take up increases, Ofcom must seek to review and reform their role in managing issues relating to interference. Ofcom is responsible for managing all the airwaves used for non-military purposes including TV and radio as well as mobile phones and radar, and can investigate and even act to ensure the best possible television reception is possible for each household within the UK. BT is not aware that any similar powers currently exist however in relation to broadband and the ongoing management of Repetitive Electrical Impulse Noise. As broadband use continues to grow and services such as BBC iPlayer become ubiquitous with programmed television viewing, Ofcom must take remedial action to ensure that adequate protection measures are in place such that consumer access to broadband is not diminished by unnecessary interference.

Lifting broadband take-up by disadvantaged groups

15. BT agrees that it is important that older or disabled people should be specifically targeted. 70% of people over 65 in the UK have never used the internet². Older people over the age of 65 who are in socio economic groups D and E are the most excluded group. However it is also vital that individuals are allowed to choose for themselves whether or not they wish to use the internet and Ofcom's own report acknowledges that some people do not want to use the internet regardless of affordability or location.
16. BT is committed to ensuring that fear of technology is not a reason for making this choice. With BT's support, Age Concern has developed a Digital Inclusion Network. Since it was launched in 2006, more than 90,000 older people have been trained by network members, of whom 39% were first time learners. BT has also provided more than £180,000 funding for grants which have been awarded to network members³. As a result of older people expressing an interest in learning more about social networking, Age Concern have organised Myfriends online week, 16-20 March 2009 and BT sponsored this event. In addition to this sponsorship, BT has funded focus group research commissioned by Age Concern to better understand what barriers need to be overcome to encourage older people aged 55-64, who are also in

² ONS Internet Access 2008 <http://www.statistics.gov.uk/pdfdir/iahi0808.pdf>

³ <http://www.ageconcern.org.uk/AgeConcern/diginetwork.asp>

socio economic group DE, to become computer/internet users. This is due to be published in September 2009.

17. A campaign conceived from BT research showed that nearly a third of parents and grandparents have been taught to surf the internet by a child aged between 13 -16 years. The BT Internet Rangers web site provides ideas, guidance and templates for teenagers to help older people. Awards of PCs for their schools were made to Internet Rangers of the year.
18. BT has provided funding and advice to HFT, an organisation which specialises in supporting people with learning needs, on the development of a DVD, low technology tool and information guides to help people chose a computer/laptop which meets their needs and shows them how to get started. This was launched at the National Digital Inclusion Conference in April 2009⁴.
19. The Community Web Builder is a free online tool provided for community groups and small charities to self build web sites. More than 11,000 community groups have set up sites since 2006. This is also available for schools⁵.
20. BT has also conducted a unique trial with individuals who had never accessed the internet called Crossing the Divide in which a variety of people were given the technology, training and help to explore the web for the first time and record their journeys⁶. This project ended in March 2009 and the case studies were published in April in the Closing the Digital Divide report⁷.
21. Further practical examples of removing barriers to Broadband take up are BT's Broadband Install Service which for £88.09 will provide an engineer to install and test BT Total Broadband and provide basic internet guidance. BT Retail was also among the first providers to remove connection charges, which typically means many customers can start their internet service for less than £10. It should not be lost on Ofcom that the introduction of these measures is due to the highly competitive nature of the consumer broadband sector.
22. Based on research published by the Office for National Statistics in August 2008, BT's Digital Inclusion KPI has been achieved one year early. The 2005 baseline of 36% of adults in the UK being digitally excluded has now fallen to 29% against a target of 32.4% by 2009/10.

Introduction of 999, 112 and 18000 mobile roaming and mobile accessibility

⁴ <http://www.btplc.com/news/articles/showarticle.cfm?articleid=BEEFAB7F-E85A-4D4C-BE7A-B471BCF1300C&Terms=>

⁵ <http://www.communitykit.co.uk/>

⁶ <http://www.btplc.com/Societyandenvironment/Digitalinclusion/Digitalinclusion.htm>

⁷ www.bt.com/researchandreports

23. Ofcom is right to highlight the provision of access to emergency services as an important issue. When BT approaches local authorities over proposals to remove loss-making payphones, of those authorities that object to removal, some 28% state the reason for objecting is that they want to retain public emergency 999 access in their area. They also state that not all mobile networks provide adequate coverage in their area, which is the key reason they want to retain the fixed line service within their communities.
24. Mobile camping, proposed by Ofcom for implementation later this year following an initial trial, is a less complex version of roaming allowing callers to piggy-back on any network for the purpose of making calls that do not need to be charged to the originating consumer such as those to Emergency Authorities. The facility to roam across networks for emergency calls was inhibited within the UK by the mobile providers although many other Member States and the USA allow this functionality. Indeed visitors to the UK from abroad can already benefit from 999/112 roaming even though UK based customers of the same companies do not. In addition, handsets already have the capacity to roam in this manner and so a change of policy to require non-chargeable calls to be offered and enabling camping to take place does not require consumers to purchase new equipment or devices.
25. However, whilst camping is a good start, commercial agreements could readily be set up to enable the making of 999, 112 and 18000 calls across any network available within that location as though the caller were dialling from within their home network area. Full roaming capacity would afford additional security against nuisance calling and also allow for the caller to be contacted back, or traced, during a genuine emergency situation where they have, for whatever reason, been unable to provide the details of where they are calling from. Were Ofcom to move from camping to requiring full roaming for 999/112 calls, it could then encourage under similar agreements full network roaming within the UK for any call type. Customers might be charged a premium for using such a facility – just as they are when roaming outside of their own Member State – however the option of making a call when their own network is unavailable would greatly increase customer accessibility and the usefulness of mobiles overall.
26. Whilst only covered very briefly in the consultation document, it is worth commenting that in addition to the camping proposals, the 999 Liaison Committee chaired by the Department for Communities and Local Government (DCLG) has held discussions over last 3-4 years between Emergency Authorities (EAs), Call Handling Agents (CHAs), the Mobile Networks, Ofcom, relevant Government Departments, and representatives of groups representing deaf, hard of hearing and speech impaired people to develop the emergency service. The emergencySMS service has been investigated as an alternative option for contacting Emergency Authorities

(EAs) for those unable to use the voice 999/112 service and, in particular, for those with hearing or speaking difficulties who routinely use SMS and either do not use real-time text terminals to contact Text Relay Emergency (18000) service or maybe in circumstances where it is not available. Users of the service will need to be registered prior to use. Once registered a User Guide will be provided detailing how to make the best use of the emergencySMS text service. An initial text to 999 for EA assistance is expected to contain the service required along with the address/location of where the emergency is taking place. The mobile networks can provide approximate location information to BT's 999 Call Centres based on the radio coverage of the cell being used for SMS transmission and BT systems have been modified to find the appropriate EA control room numbers using this information.

27. The trial and the development of the service will be managed by a Trial Steering Group made-up of nominated members of the 999 Liaison Committee. The scope of the trial will be to assess the technical feasibility of providing an e-SMS service to mobile handsets that have been registered with the Service. The trial will cover the United Kingdom, will be available on all Mobile Networks that agree to take part, cover all Emergency Authorities and allow emergency SMS texts to the Ambulance, Police, Fire and Rescue and Coastguard Services. It is expected that this service will start test calls from June 2009 with a trial service with genuine users planned for August/September 2009.
28. Initiatives such as the above aside, handsets continue to be an issue for many and an inclusive design approach would seem to be needed. The text and video capabilities are advances for people with hearing impairments but the menu driven systems and small screens may cause problems with visual impairment and the option for different text sizes or zoom facilities should be standard (as now occurs in many PC software packages). Text Relay access is also needed as standard. In order to be able to use Text Relay from a mobile, the network needs opening up to enable 18xxx calls, devices need a reasonable keypad for typing and to include appropriate software to enable the communication to happen. Software does exist that is compatible with a number of handsets (RNID Type by Text Mobile edition). The major mobile providers should provide mobile textphone functionality and audio output as part of their offerings.
29. A range of handsets is needed from mainstream devices which have been designed more inclusively to more specialist products. Some simple handsets with larger buttons are on the market today but through specialist suppliers. This means that users will have to purchase SIM cards separately and in order to get a contract may end up having to buy a device from a service provider that they cannot then use. Users need to be able to purchase a specialist handset on a contract. A range of tariffs is also needed for example text only (for people who do not make voice calls) and monthly

payments with a cap to prevent high levels of spend (supporting people who are not aware of the build up of usage charges).

30. Guidelines exist to help manufacturers produce more inclusive handsets⁸. Some additional features could be voice control, ability to connect an inductive neck loop, a range of keypads, ability to change the colour scheme. The modern touchscreen devices can make it more difficult for some people to use them e.g. people with visual impairment who have no tactile indicators to navigate by, people who have a tremor and people who use text and find a keypad easier.
31. The Inclusive Design Toolkit has been commissioned by BT and developed in partnership with the Engineering Design Centre of Cambridge University. Since it was launched in 2007, it has received around 2.5 million online hits and is now incorporated within design courses in several universities around the world. BT hopes that mobile device producers utilise this facility when conceiving new products and Mobile Providers familiarise themselves with these concepts for incorporation into devices that they commission for future manufacture.

Introducing improved relay services for the hearing impaired

32. In discussing text relay, Ofcom offers up the somewhat misleading statement that the service relies on technology that is 30 years old. It is correct that the protocols used by the textphone and network interfaces to package and deliver text over a telephone line have been in use for a considerable period but C7 signalling was also launched 30 years ago and remains probably the single most popular system in use today throughout the global telecoms industry. The Text Relay platform⁹ that BT uses to facilitate textphone conversation was launched in 2001 and continues as a world leader, able to directly connect text to text callers, regardless of operating protocols, without the need to involve a 3rd party operator.
33. Relay services address the basic end-user need of being able to converse with other people using alternative media; voice, text, and/or video. However, if asked, end-users will frequently say they need access to a relay assistant and this perceived 'need' appears to be based on a degree of 'hand holding' due to previous bad experiences resulting from organisations not providing a suitable access route, or where organisations did provide textphone access it was poorly managed e.g. a textphone was not answered due to resource or training issues. Clearly there will be a need for relay assistants for some considerable time into the future and BT is absolutely committed to providing Text Relay to meet this need. However the ability for new communications

⁸ Guidelines can be found at www.tiresias.org.uk/research/guidelines/telecoms/mobile.htm

⁹ Previously called TextDirect

technologies to support multiple communications modes means that the basic need should more and more often be met by mainstream products¹⁰ as these further develop. If this is the case the presence of relay assistants then becomes a 'safety net' that is only required on those rare occasions when the communicating parties do not have access to compatible terminal equipment.

34. Another concern for text relay users has been IP access to the relay service in order to allow access to cheaper call charges. More recently, this focus has moved somewhat into a desire to move away from the dedicated textphone. In theory IP access can be easily provided through a simple web based application and indeed, BT's BroadBand Talk option is accessible for relay users and free software is available on the internet to enable a PC to work as a textphone¹¹.
35. Overall therefore, BT fundamentally believes that in considering how best to address the needs of customers with additional accessibility requirements, any review should not concentrate on telecoms. Relay allows ad hoc communication for those customers that need the service to make infrequent, one-off calls but in today's society there are numerous communication options with real-time conversation being just one of them.
36. Today's technologies provide new ways for sign language users to communicate at a distance and for businesses to provide information in BSL. BT was the first FTSE 100 company to develop content in BSL on its website¹². It includes a guide to broadband and highlights the benefit of the use of webcams for sign language users. Mobile phones now have video functionality enabling video calls just like voice calls.
37. Video relay does already exist in the UK and Ofcom acknowledges that demand is limited by the number of people whose first language is BSL¹³.
38. With the availability of direct communication between sign language users, sign language interpretation to enable communication between BSL users and non-BSL users is needed primarily within a business environment for employees and for people to communicate with organisations whether commercial or public sector service providers. As the main beneficiaries are UK businesses as a whole with responsibilities for inclusion under the Disability Discrimination Act, BT does not believe that video relay is a service that communications providers should be expected to contribute to or

¹⁰ Instant Messenger and SMS chat, email, web-cams and video calling in addition to PC screen reading software, BT text, and Spinvox and further specialist products that allow combinations of these services such as personal computers and PDAs.

¹¹ <http://www.textrelay.org/downloads.php>

¹² www.bt.com/btsign

¹³ The Access & Inclusion consultation says 'Estimates of the number of deaf signers who use BSL as their first language range from 30000 to 70000 with the RNID using a figure of 50000'. 2001 census has shown numbers of Gaelic speakers has dropped to below 60000 <http://news.bbc.co.uk/1/hi/scotland/2755411.stm> c600k people speak Welsh

subsidise simply because they are communication providers. Commercial services exist that businesses could contribute to now and their customers could then benefit from.

39. In the Public Sector, Sign Translate allows healthcare professionals to access fully qualified sign language interpreters on-line, providing greater support for more complicated consultations. The service is free for patients¹⁴.
40. BT therefore considers there to be a vital role for Ofcom in setting out, as a minimum, call centre best practice – perhaps in partnership with the Equality and Human Rights Commission and Contact Centre Association, and more widely, in helping businesses who use telephones as their key communications tool in dealing with their customers to understand their responsibilities and how to utilise the variety of available media to make their services fully inclusive.
41. Furthermore, as technology continues to allow the development and provision of mainstream inclusive products, the responsibility to ensure easy accessibility for people with disabilities has shifted away from communication providers to fall more noticeably upon UK businesses as a whole with their own obligations under the Disability Discrimination Act. BT has, for instance, initiated 'live chat' on its inclusive communications website to enable customers who prefer to have a conversation about products and services via text to do so easily. UK businesses are the main beneficiaries of facilities such as text relay, the availability of which allows them to do little to make their services equitably accessible and facilitates low cost communication in the media chosen by the business rather than the customer. BT believes therefore that any requirement for additional relay services or other specialist facilities will further benefit businesses overall and that, as such all UK businesses have a role to play in contributing to the cost of this provision.

¹⁴ www.signtranslate.com

Consultation questions

Section 2: Introduction

Question 2.1: Do you agree with the overall framework for assessing the components of access and inclusion of relevance to Ofcom?

BT agrees with Ofcom that universal availability of services can only be beneficial to consumers and as the market is allowed to develop, more will become available to encourage take-up in a relevant and appropriate manner. However, due consideration needs to be given to whether or not consumers actively want or need the services being examined.

Section 3: Ofcom's role

Question 3.1: Do you agree with the types of possible interventions that our powers and duties offer us?

BT agrees with Ofcom's assessment of its powers but would stress the need for appropriate use when applying these moving forward to ensure that potential funding mechanisms, service delivery and product innovation are not stifled or inhibited by excluding key members of the industry.

Question 3.2: What do you see as Ofcom's future role in promoting access and inclusion?

BT considers that Ofcom have a role in balancing the needs of consumers against what industry as a whole can effectively provide and, as a trusted and responsible source for information, they have a part to play in the ongoing education of consumers about communications, technology and suitable services to best meet their personal needs. In addition, Ofcom must work to help businesses understand their responsibilities and how to communicate with customers effectively and without discrimination. (see paragraph 40)

Section 4: Which services matter?

Question 4.1: We have considered the ways in which mobile, broadband internet and digital radio services can facilitate participation in the economy and society. Our initial view is that of these three services, having access to broadband internet is likely to be the one requiring most immediate policy focus from an access and inclusion perspective, along with 999 roaming. Do you agree?

Whilst the introduction of 999/112 mobile camping is welcomed, BT does not agree that access to broadband internet is more requiring of immediate policy focus by Ofcom than that of mobile accessibility. See paragraphs 28, 29 and 30 of our main response above.

Section 5: Availability

Question 5.1: Do you agree that Ofcom should include availability issues in relation to current generation broadband and the ability to call the emergency services from another network if one's own network is unavailable in its immediate access and inclusion priorities?

Question 5.2: Are there other gaps in the availability of key services that you believe are particularly critical for consumers and citizens? Please support with evidence where possible.

Further to our response to Question 4.1 above, BT believes that more consideration must be given by Ofcom to address mobile coverage including not-spots and drop-spots and access to mobile broadband services in addition to establishing a code of practice (or similar) to afford greater consumer protection in this area (see paragraph 13 of the main response).

Section 6: Take-up

Question 6.1: Which of the barriers to take-up do you believe most pertinent, and for which groups in society? What other factors may be relevant?

There has been extensive research into the barriers to internet/broadband take up by ONS, Ofcom, Oxford Internet Institute and many others. We agree with the analysis in the report commissioned by UK Online Centres: *Digital Inclusion, A discussion of the Evidence Base*, which identified the main barriers as:

Access – whether an individual has some means to access digital technologies

Motivation – whether the individual sees some benefit from or has interest in accessing these technologies

Skills and confidence – whether the individual is able to, and feels able to, make effective use of technologies

As part of BT support for the Everybody Online projects, we have commissioned independent research to measure the impact of these projects. For people who were non users of the internet, the main reasons identified were:

- Lack of interest.
- Not having the equipment
- Lacking the skills or confidence
- Feeling too old (predominantly amongst the 55+ age group)
- Concerns about the running costs
- Not having sufficient time

BT has also contributed to the evidence base through the Crossing the Divide project where non users from a variety of different backgrounds were helped to develop computer and internet skills.

Question 6.2: Do you agree that new measures may be needed to help lift broadband take-up, particularly to address low levels of take-up by disadvantaged groups, and that this issue should be a new priority area for Ofcom?

The take-up of broadband services is one that is the responsibility of a wider remit than Ofcom appears to have considered in the consultation, extending to internet service providers and content providers to ensure relevant, inclusive and easy to understand services are available to all. Content providers in particular have a role to play in driving consumer take-up by appropriate marketing of services that seek to engage and enrich society as a whole.

New measures are needed to increase broadband take up particularly by disadvantaged groups but this should be led by the Minister for Digital Inclusion working with the cross government cabinet committee, the Digital Inclusion champion, expert task force and devolved administrations. As the regulator for this area, Ofcom can make an important contribution to ensuring that any regulatory changes are effective in achieving the desired outcomes.

Section 7: Ability to use services effectively

Question 7.1: Do you agree with our assessment that tackling the barriers that disabled people face when using communications services should be a priority, and that as part of this our review should assess the case for introducing improved relay services for hearing impaired people?

BT is absolutely committed to ensuring that the services we provide are both inclusive and accessible and undertakes a great deal of work with other relevant groups within the sector to research and develop appropriate products. Innovation can be stifled by regulation and Ofcom must take this into account in their consideration of inclusive services in addition to ensuring that any change to the current regime is applied even-handedly across the industry as a whole, or funded appropriately.

Question 7.2: Are there other issues in the area of effective use of key services that you believe are particularly critical for consumers and citizens? Please support with evidence where possible.

BT continues to believe that provision of high cost niche services are neither feasible nor justified and that, instead, Ofcom should place greater focus on investigating and ensuring delivery of services that are accessible to all. In this way, Ofcom may then need to publish guidance to assist communications

providers, internet service providers, content providers and UK businesses as a whole to put in place sufficient steps to ensure inclusion. BT has experience in this area and would welcome the opportunity to work with Ofcom to assist in drawing up such guidance.

Section 8: New priority areas

Question 8.1: Do you agree with our proposed priority areas? Are there any areas that should be ranked above these and why?

Whilst we welcome the immediate focus on USO reform and Ofcom's intention to introduce mobile camping for 999/112 BT considers that improved mobile accessibility must be dealt with at the highest level of priority.

Question 8.2: Which areas might we focus on in future years and why?

Address mobile accessibility of handsets and coverage (see response to 8.1)
Establish best practice guidance (see response to Question 7.2)