

New Zealand Telecommunications Relay Services Beyond 2019: Submission template

The closing date for submissions is **5.00pm, Friday 13 April 2018**.

You can make a submission by emailing RelayConsultation@mbie.govt.nz or by posting your feedback to:

NZ Relay Project Team
ICT Policy & Programmes
Ministry of Business, Innovation & Employment
PO Box 1473
Wellington 6140
New Zealand

If you post your submission, please also send it electronically if possible (as a PDF or Microsoft Word document).

New Zealand Sign Language (NZSL) users are also able to make video submissions in NZSL. For further information please visit <http://www.mbie.govt.nz/info-services/sectors-industries/technology-communications/communications/telecommunications-relay-service/>.

Please complete the following contact details:

Your name:	Victoria Manning
Your email address:	

Is your submission on behalf of an organisation?

✓ - copy and paste this symbol to mark your answer if completing on a computer

✓	Yes
	No

If yes, please write the name of the organisation and your position here:

<p>Deaf Aotearoa</p> <p>Deaf Aotearoa is the national organisation representing the voice of Deaf people, and the national service provider for Deaf people in New Zealand. Deaf Aotearoa also works closely with Deaf communities, government agencies and other organisations to increase awareness, promote NZSL and strengthen the rights of Deaf people. Deaf Aotearoa is the New Zealand representative member of the World Federation of the Deaf.</p>

If you or your organisation do not wish your name to be included in any summary of submissions that the Ministry may publish, please advise here:

No, I do not want my name / organisations name published in any summary of submissions

If you or your organisation object to the release of any information contained in this submission, please advise here:

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If completing as an individual, which region do you live in?

√ - copy and paste this symbol to mark your answer if completing on a computer

<input type="checkbox"/>	Northland	<input type="checkbox"/>	Wellington
<input type="checkbox"/>	Auckland	<input type="checkbox"/>	Tasman
<input type="checkbox"/>	Waikato	<input type="checkbox"/>	Nelson
<input type="checkbox"/>	Bay of Plenty	<input type="checkbox"/>	Marlborough
<input type="checkbox"/>	Gisborne	<input type="checkbox"/>	West Coast
<input type="checkbox"/>	Hawke's Bay	<input type="checkbox"/>	Canterbury
<input type="checkbox"/>	Taranaki	<input type="checkbox"/>	Otago
<input type="checkbox"/>	Manawatu-Wanganui	<input type="checkbox"/>	Southland
<input type="checkbox"/>	Outside New Zealand. Please specify location:		

If completing as an individual, which age bracket do you (or the person you are completing the form on behalf of) fall into?

√ - copy and paste this symbol to mark your answer if completing on a computer

<input type="checkbox"/>	Under 18	<input type="checkbox"/>	45 – 54
<input type="checkbox"/>	18 – 24	<input type="checkbox"/>	55 – 64
<input type="checkbox"/>	25 – 34	<input type="checkbox"/>	Over 65
<input type="checkbox"/>	35 – 44	<input type="checkbox"/>	Prefer not to disclose

If you are comfortable doing so, please tick any communications disabilities that apply to you, the person you are completing this submission on behalf of, and/or the body of people you or your organisation represents:

√ - copy and paste this symbol to mark your answer if completing on a computer

√	Deaf
√	Hearing Impaired
	Speech Impaired
	Deafblind
	Other (please specify)
	Prefer not to disclose

Are you a hearing recipient of relay calls, or user of the VIS?

√ - copy and paste this symbol to mark your answer if completing on a computer

	Yes
√	No

Are you a user of New Zealand Sign Language?

√ - copy and paste this symbol to mark your answer if completing on a computer

√	Yes
	No

Are you a user of any of the relay services? If so, please tick which services, and the frequency with which you use them, below:

√ - copy and paste this symbol to mark your answer if completing on a computer

	Every day	Several times a week	Once a week	1-3 times a month	Less than once a month
Teletypewriter to Voice					
Voice Carry Over					
Hearing Carry Over					
Mobile Text Relay	√				
Internet Relay	√				
CapTel					

Web CapTel					
Video Interpreting Service	√				
Speech to Speech					
Video-Assisted Speech to Speech					

If you are a user of the relay service, please describe the purposes for which you use it. For example, for social/personal calls, to conduct business, to use interpretation services for appointments:

Deaf Aotearoa is the national representative voice of Deaf New Zealanders and has over 2,000 members, and almost 2,000 Deaf service users. Our membership, service users and Deaf community use the relay service for a wide range of purposes, including to make calls related to employment responsibilities and tasks, for a wide range of personal tasks, such calling services (Work and Income, GPs, DHBs, Plunket, etc) and businesses. The video interpreting service is widely used for all areas of life where the Deaf persons preferred language is NZSL.

If you are not a user of the relay service, please describe your interest in this public consultation:

Which of the current services were you aware of prior to completing this submission? Please tick the services below:

√ - copy and paste this symbol to mark your answer if completing on a computer

√	Teletypewriter to Voice	√	CapTel
√	Voice Carry Over		Web CapTel
√	Hearing Carry Over	√	Video Interpreting Service
√	Mobile Text Relay	√	Speech to Speech
√	Internet Relay	√	Video-Assisted Speech to Speech

Availability of Services – Please let us know if your comments relate to a specific service

1. What is your view of the current availability of the relay service (i.e. are you able to access the relay service when you need it?)

VIS availability is limited to 8am – 8pm weekdays and not available at the weekends. This creates a barrier to Deaf people’s participation after hours, in the weekends and on Public Holidays. Examples of these barriers include parents with sick children who

want to call the Healthline for advice after hours, calling family and friends over Easter or Christmas.

VIS is limited to using the Skype platform which is not the best or more reliable video calling programme/app. Skype frequently freezes or presents a picture that is not smooth making NZSL comprehension difficult or impossible and thus rendering the call ineffective. Deaf Aotearoa is aware of, and use, several other video calling platforms that perform much better than Skype, and these other platforms have been around for a long time, such as *Zoom* and *Appear-in*. Deaf Aotearoa is also aware of relay technology that does not require the caller and end users to both have the same programme/platform, i.e.: a relay platform that can call into ANY phone number or video call.

This point is important to include in the TRS contract going forward, i.e.: the TRS provider **MUST** be constantly reviewing and updating its technologies to keep up with the times and to be continually improving the accessibility and effectiveness of calls.

The VIS service requires a device and a high speed broadband connection. The costs of these is out of reach for many Deaf people. As a population group, Deaf and disabled people have a lower socio-economic status than hearing and non-disabled people. To remove these barriers to VIS users on low-incomes equipment (devices) and subsidies for broadband costs must be provided.

There still appear to be many barriers to hearing people and the public making calls to Deaf people. These need to be addressed so that ANY person can make a call to a Deaf person at any time.

These availability issues above need to be addressed to enable Deaf people to participate in society.

2. If you have encountered problems, what are these and what impact have they had?

Skype often freezes or is not a smooth enough connection for NZSL comprehension, and calls and VIS interpreting service bookings have to be terminated. This is frustrating and as well as not providing effective access and continuing to marginalise Deaf people, it often puts people off using the service again.

There are barriers in the current TRS services to calling mobile numbers.

3. What changes could be made to relay services to improve their availability, and why?

Use a platform that is better than Skype, providing more wide reaching, smooth and

reliable access (see comments above).

Ensure ALL phone numbers are equally accessible, i.e.: removing the barriers to calling mobile numbers. Currently, calls to mobile number require a number of extra steps, including purchasing a calling card in advance. Hearing people can and do make calls to mobile numbers without having to purchase a use a calling card.

As a population, Deaf people comprise a lower socio-economic group and barriers specific to people on lower incomes need to be addressed, including:

- Providing equipment (devices) and subsidies for broadband costs
- Providing teaching and promotion resources (staff and material resources) that support people who are not tech savvy

Accessibility – Please let us know if your comments relate to a specific service

4. What additional measures or initiatives could be introduced to increase awareness of the relay service and its benefits to users of the service and the wider community?

5. If you had the choice between accessing a relay service from a fixed device at home or from your mobile, laptop or tablet, which would you prefer and why?

Both options should be available. Deaf people are a very diverse group and there will be times when Deaf people are accessing the TRS at work or home from a fixed device and times when Deaf people are accessing the TRS while mobile.

6. What specific relay services would you like to see available on your mobile, laptop or tablet and why?

ALL TRS services should be available on all devices.

Currently, various TRS services are accessed from different entry points which can be confusing. It would be better to have all TRS services accessible through one entry point. Deaf people use the TRS in different ways for different types of calls. For example, a Deaf person may use VIS for a meeting with their GP or meeting with their supervisor, then use Internet Relay for making calls as part of their work responsibilities, then use Text relay when they are out and need to make an urgent call to a family member.

7. For those relay services that are available on your mobile, laptop or tablet already, are there any improvements that could be made that would make them easier to use and why?

As mentioned above, one single entry point for all the TRS services would make it easier to access.

8. Are there any other issues related to ease of access and use with the current relay service that we should consider?

As a lower socio-economic group Deaf people are at greater risk of being marginalised and left behind both in accessing calls and being included in the digital age we live in.

Being able to place outgoing calls and receive incoming calls needs to be equally enabled.

Affordability – Please let us know if your comments relate to a specific service

9. Are the costs of connectivity a barrier to you accessing and using the relay service?

Yes. See comments above on this.

10. If so, what are the specific problems you have encountered and what impact has this had?

Costs barriers and technology-capability barriers need to be specifically addressed. Deaf people of a lower socio-economic status are the most marginalised among the Deaf community and may benefit tremendously from access to the TRS.

11. What changes could be made to the relay service to improve its affordability and why?

See comments above.

Fit for Purpose – Please let us know if your comments relate to a specific service

12. Are there any particular features or changes that you think should be made to the relay service to ensure it continues to offer a good experience to users and why?

Outgoing and incoming calls should be equally accessible on the TRS platform.

The TRS should make use of the latest modern technologies and ensure ongoing improvements to technological efficiencies.

13. Are there any relay services or equipment that you consider are no longer relevant and could be phased out or discontinued? If so, what measures or support would need to be provided to transition users to other services or mainstream devices?

TTYs are rarely used now.

14. Have you ever discontinued use of any of the relay services? If so which service or services, and why?

Skype calls have been discontinued due to poor connections.

Internet reply services have been slow and cumbersome.

Any Other Comments – *Please let us know if your comments relate to a specific service*

15. What other comments do you have about New Zealand Telecommunications Relay Services?

Deaf Aotearoa recommend that the Relay Advisory Group be disestablished and in its place a new advisory group is formed that:

- **Is comprised mostly of representatives from organisations that have a mandate to represent their members. This provides accountability in ensuring people on the advisory group are representing the widest possible diversity of the community and ensure that issues are appropriately shared with and reported back to their organisation's members**
- **Clarifies the role of the advisory group being to either provide advice to the TRS provider or provide advice to MBIE. There may be times when advice to the TRS provider and advice to MBIE is in conflict, such as when commercially sensitive information is being raised or if provider issues are not being addressed. Currently, the Relay Advisory group appears to be reporting to both MBIE and the TRS provider which is a conflict of roles, and these roles should be separated and clarified in the establishment of a new advisory group going forward.**

Thank you for taking the time to complete this submission. Your feedback is appreciated.

Publication of submissions

Written submissions may be published at www.mbie.govt.nz. We will consider you to have consented to publication by making a submission, unless you clearly specify otherwise in your submissions.

In any case, all information provided to the Ministry in response to this discussion document is subject to the Official Information Act 1982 (OIA). **Please advise if you have any objection to the release of any information contained in a submission**, and in particular, which part(s) you consider should be withheld, together with the reason(s) for withholding the information.

In particular, please clearly indicate in your submission if you do not wish your name and any other identifying details to be included in any summary of submissions that the Ministry may publish, or in any responses to OIA requests.

The Ministry will consider all such objections when responding to requests for copies and information on submissions to this document under the OIA. Please note that in certain circumstances information you have provided us may be required to be released to a requester under the OIA, even if you would prefer it to be withheld.

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