Submission Template
Proposed changes to the NZSL Video Interpreting and Relay Services

We want to know what you think

We want to get your feedback about the proposed changes to the NZSL Video Interpreting and Relay Services.

What do you think about the proposed changes?

Do you have any concerns about them?

Here is a recap on the proposed changes:

- Change 1: Get you to register as a user
- Change 2: Make the video interpreting service more available
- Change 3: Move to digital text-based relay services
- Change 4: Phase out CapTel equipment
- Change 5: Stop using Teletypewriter (TTY) equipment
- Change 6: Stop speech-to-speech services

How you can have your say

- You can tell us what you think by writing in the form below and can then either email us your feedback, or print it out and post it to us:

  Email: *relayconsultation@mbie.govt.nz*

  Post: Communications Policy
  Building, Resources and Markets
  Ministry of Business, Innovation & Employment
  PO Box 1473
  Wellington 6140
  New Zealand

- If you use New Zealand Sign Language you can also send in a video of your signed response. Go to the website *www.seeflow.co.nz/direct* where you will be able to create your video message.

Closing date: We need your feedback by 9am, Monday 15 April 2019

Please tell us about yourself

Name:

Thor Nielsen

nWise AB - global supplier of technology for Relay Services

Email or Address:

thor.nielsen@nwise.se

Do you use any of the services?

We provide technology for national relay services in 12 countries, e.g. the United States, Sweden, Denmark, Germany, the Netherlands, Scotland, Thailand.

Is there anything else you would like us to know?

Short background about our company and the author of this document, Thor Nielsen:

As described above, we are a technology provider with wide experience from different countries. We are unique in our field and work very closely with service providers, end-user organizations and telecom regulators.

Our experience is also unique and broad. Some examples:

- nWise works with the development and implementation of technical standards defined for use in Relay Services by ITU-T, ETSI and FCC.

- We provide, implement and operate communication platforms for national relay services in countries as diverse as Sweden, the United States and Thailand.

- Our technology has been developed and used to provide Telecom Relay Services since 2001. Some of our oldest customers are the National Video Relay Service in Sweden (since 2003), the National Text Relay Service in Denmark (since 2002), the National Video and Text Relay in Germany (since 2004).

Thor Nielsen has started to work in this area since 1998, when analogue technology (TTY and ISDN videophones), and have worked through the transition to internet-based services, smartphones, and now being able to test our technology in the 5G-network in Sweden and 15 other countries.

☐ Please tick ✓ if you do not want us to publish information about you.

We will publish some feedback

We intend to publish some of the feedback that people send us.

Please let us know if you do not want us to publish your name, or to publish any particular part of your feedback.

Any information you give about yourself will only be used to help us make decisions about the proposed changes.

The Ministry of Business, Innovation and Employment are part of the government, people will be able to use the Official Information Act 1982 to ask us to show the feedback we get.

When responding to these requests we will take into account those who did not want their personal information published.

Questions

Change 1: Get you to register as a user

Q: What do you think about requiring users to register to use the services? Do you have any concerns about this?

> In the countries where we provide technology for relay services, we have valid experience regarding services that require registration and services that do not require registration.
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> Generally, the opinion is that if a consumer wants to receive calls, they need a registration, but if they only make calls from time to time, it is not necessary. Registration is used in the United States as a means of limiting fraud and misuse, but the experience in Europe is that fraud is extremely seldom, as opposed to the experience in the United States.
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> Our experience is that a combination of registration and non-registration is optimal. We have successfully rolled out services in e.g. Sweden and Switzerland where the consumer may access the services to make calls via the web without a registration, or in other case register to get an app, a phone number, and receive calls.
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> In many countries, registration is not necessary if a consumer wants to use the relay service to reach emergency services. nWise has implemented this option in the Netherlands, Sweden and Switzerland.

Change 2: Make the video interpreting service more available

Q: What do you think about our proposals for making the video interpreting service more available? Do you have any concerns about them?

When making services more available, e.g. by expanding the opening hours, it is also important to increase the availability by other means, for instance:

- Include text modality into the video relay service, thus implementing the standard Total Conversation.
- Allow that a single app be used to make and receive calls to the text and video relay services.
- Implement internationally available and widely used standards throughout the services.

Total Conversation is a standard promoted by ETSI and ITU-T, and it means that text, video and voice are implemented in the services. Text in Video Relay Services is easier when names, addresses, medicine, etc., are communicated.

The experience in a number of countries in Europe is also that one single app should be used for both services. This is especially useful when a consumer wants to access BOTH services, or if for instance the Video Relay Service closes down during the night – then all calls are connected to the text relay service (IP relay) if the video relay is closed.

Consumers are usually more comfortable with one single app for both services since they do not have to register and learn how to use two apps. Also, a single app makes outreach and training easier. At the start of the call, the consumer may decide if s/he wants to use another relay service than the one of her/his preference.

Additional features should be added for night shift, for instance call-back functionality and emergency call handling/queue – for instance, if only 1-2 interpreters work during the weekend or night shift, and an emergency call comes in.

Standard technology allows for communication across services, and for wider accessibility to emergency services, health care, and other essential services. We see standard technology as a way to make services more accessible, and therefore we repeat this issue under Change 3, below.

Change 3: Move to digital text-based services

Q: What do you think about moving to digital text-based relay services? Do you have any concerns about this?

Moving to digital text-based services improves accessibility and flexibility for the users. For instance, it is easier for an elderly person to use an iPad than a TTY, and accessibility features for people who are deafblind or have motoric disabilities are more readily available.

When moving to digital-based text services, it is important to define the technical standards. The text standard used in text-based services should be the same as what is used in video relay services. This will ensure across-the-board accessibility. For instance, in Europe and more recently the United States, text standards are the same for apps, relay services and next-generation emergency services (112/911 services).

Global standards defined by the ITU-T, such as Total Conversation and Real-time Text RTT (based on RFC 3261 and RFC 4103) are now supported by the Federal Communication Commission (US Video Relay SIP Profile, and RTT) as well as Europe (European Commission and European Telecom Standards Institute – EN 301 549, Harmonized European Standard).

These standards are important as more and more mainstream technology suppliers and service providers, such as Ericsson, CISCO, AVAYA, suppliers of internet routers, telecom providers, etc., follow the standard and support transmission and connectivity. For instance, it has been key in the roll-out of accessible Emergency Services in Europe as defined by the European Disability Act, which will come into force in 2020. In the United States, the FCC allowed mobile operators to discontinue network support for TTY only if the operators support RTT.

It is also important to enable users to make calls to emergency services via the same app that they use to make phone calls. In some countries, for instance the Netherlands and Sweden, users can call direct using Real-time Text to the emergency services, and this has been a great achievement. This is possible since apps, relay services and emergency services use the same technology standards.

Change 4: Phase out CapTel equipment

Q: What do you think about stopping the use of CapTel equipment? Do you have any concerns about this?

This makes sense in our opinion.

Additional note and/or observation that nWise wants to point out is that, unfortunately, CapTel uses proprietary technology and is therefore not used in Europe. It does not follow ITU-T recommended standards and the technical guidelines and references in EN 301 549.

Change 4: Phase out CapTel equipment

Q: What do you think would be a reasonable length of time to allow existing CapTel users to change over to new digital relay services?

Users should be allowed a transition time.

Change 5: Stop using Teletypewriter (TTY) equipment

Q: What do you think about stopping TTY services? Do you have any concerns about this, including the timing for doing this?

This change has been adopted in several European countries, and several more countries are to follow including the United States. Our experience is that it should be done through a period of a few months and up to 1-2 years, during which consumers that still use TTY would be contacted via outreach with information and guidelines.

For instance, we have observed in the Netherlands that if TTY are closed down too quickly in one day only, with little information to the consumers. The consequence was that 20-30% of the consumers did not have a chance to move on to the new services. The phase-out in Denmark and in Germany was done as part of an on-going outreach process, and TTY users were gradually moved to IP-based solutions. The other Nordic countries (Norway, Sweden and Finland), and Switzerland, have implemented a so-called gateway to interconnect these users to the service, so that they are not completely shut off from communication with hearing people, heath care services, emergency services, etc.

Standard technology that allows p2p communication between text users, video users, and between these groups (so called Total Conversation), as described above, should be also enforced so that these services are widely accessible. Total Conversation uses SIP according to RFC 3261 and RTT according to RFC 4103.

It is also important to keep in mind that special apps be rolled out for the deafblind community, which can connect smartphones and computer-based apps to special equipment such as screen readers and/or braille displays and keyboards.

Lastly, TTYs have telephone numbers. So it is important to also consider to introduce a number plan for consumers; it makes telephony more accessible if a deaf individual can provide a telephone number to their peers, in their business cards, medical applications, etc., rather than the phone number of a relay service.

Change 6: Stop speech-to-speech services

Q: What do you think about stopping speech-to-speech services? Do you have any concerns about this?

nWise has implemented new speech-to-speech services in Sweden (***www.teletal.se***), which is integrated into other services in a call center, thus not a burden for the financer nor the service provider. The number of calls has increased through the past 1-2 years since its introduction. The service is still limited in size, but it has shown to be a life-line for a few hundred individuals in Sweden. There are discussions in Europe of introducing these services in other countries.

VoIP and telephone technology can successfully be rolled out to modernize the service, which can also be integrated with the new IP-based text relay. This way, it is not a "burden" in the economy as relay agents would work with different services.

Moreover, special technology is being made available in Augmentative and Alternative Communication devices (AAC), which will allow a greater number of people to access telephony.

Final thoughts

Q: Do you have any final thoughts, comments or feedback?

Other topics regarding coordinating with agencies and implementation/requirements of technical standards:

We find that countries that do incentive cross-agencies discussions and collaboration in order to promote access to telephony often show a greater result than countries that do not work with cross-agencies discussions and collaboration.

In the Netherlands, for instance, the following agencies work closely with the Relay Service Providers, technology providers and end-user organizations: the telecom regulator, Ministry of Economic Affairs (service finance), Ministry of Health (issues concerning equipment for disabled people), health insurances (purchase of equipment), Ministry of Justice (individual rights), the Dutch Police (emergency services), plus telecom operators and end-user organizations. This ensures that the uptake, finance and distribution of equipment and services are provided to different user groups.

In Sweden, a similar collaboration is done with the following agencies, Relay Service providers, and user organizations: the Department of Social Affairs (finance of equipment), Telecom Regulators (service regulation and finance), county governments (outreach and equipment distribution), and the National Accessibility Agency (MFD).

Regarding Technical Standards:

As new technology is introduced, we find it very important that the Ministry should require that current standards that are widely accepted, such Total Conversation, which includes SIP according to RFC 3261 and Real-time Text according to RFC 4103. These standards are incorporated in current legislation in the US and in Europe: The VRS SIP Profile is a good example in the US (Federal Communication Commission), and in Europe we have an equally important document defined by the European Telecom Standards Institute (ETSI) about Harmonized Relay Services, and enforced by the European Commission.