



**Submission in response to MBIE/ODI consultation on proposed
changes to NZSL Video Interpreting Service and Relay Services**

from

T-Meeting Global

We Make it Possible!

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Purpose and structure of response

This document sets out T-Meeting's response to the public consultation document. It draws on the author's knowledge of the overall development of the current relay services in New Zealand over a period of 14 years while contracted to MBIE and its predecessor MED, recent liaison with DPOs, NGOs, service providers and end-users together with knowledge of relay and direct services technology and service providers internationally.

In addition to providing feedback to MBIE on its document, this response sets out major issues that must be addressed with respect to technology, promotion of services, support to end-users and funding that have been omitted from the discussion document. T-Meeting submits that without consideration of these additional matters policy outcomes of the consultation will not be fit for purpose.

This response is structured into three sections:

- a. Comment on the MBIE discussion document.
- b. Additional issues which must be addressed to overcome shortcomings with the current contractual arrangements. These issues were included in the New Zealand Relay Strategic Plan first written in 2015 and updated with 2015-16 call data September 2016.¹ This document was twice requested by a member of the New Zealand Relay Advisory Group and twice refused before the OIA was cited. A slightly redacted version was then issued under cover of a letter that made certain accusations as to the accuracy of the document. Jane Tier, the then Manager Policy and Programmes subsequently issued a written letter of apology withdrawing the accusations.²

There has been little progress evident in relay policy development since the New Zealand Relay Strategic Plan was written despite at least six policy analysts working in the area.

- c. A distribution list for this submission.

T-Meetings grants MBIE permission to publish this response document on the MBIE website in its entirety.

¹ Redacted document available here:

<https://www.dropbox.com/s/ev8zllfywggwml4/2017%2006%2014%20DOIA1617-1359%20Chris%20Sinclair%20-%20Sent%20to%20Requestor%20%281%29.pdf?dl=0>

² Exchange of letters available here:

<https://www.dropbox.com/s/dtohb1xcr65k6sj/Letter%20Jane%20Tier%20re%20her%20letter%20to%20Mr%20Sinclair%2014%20June%202017.pdf?dl=0> and here:
<https://www.dropbox.com/s/hl88wsocak24bzf/Letter%20to%20Paul%20Buckrell%207%20July%202017.pdf?dl=0>



Introduction

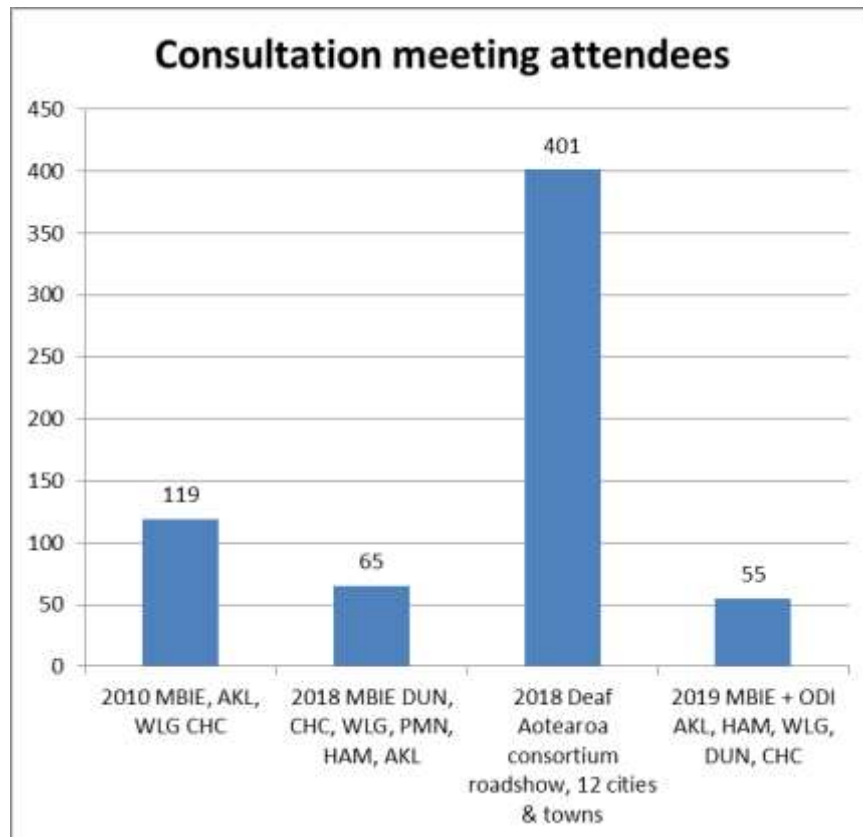
We want your feedback on changes we're proposing to the video interpreting and relay services

T-Meeting supports the introduction of modern services.

The MBIE/ODI document is in English but uses the Māori word whānau. It is unclear whether this implies that Maori language support through relay or direct services is proposed.

How you can have your say

As for MBIE's previous consultation in 2018, the notice period for people to participate in workshops was far too short despite MBIE being informed that two months' notice is required to allow NGOs to inform people by posted notice. Many potential relay users do not currently have an internet connection, email or web browser. T-Meeting is unaware of any public notification of this consultation other than on-line. One would expect that MBIE would learn from its previous consultations and to strive for continuous improvement. The following chart shows that continuous improvement has not been achieved by MBIE:



In 2010 MBIE carried out consultation with short notice only in Auckland, Wellington and Christchurch led by a graduate trainee. Venues were acceptable and catering was appropriate.



In 2018 MBIE carried out consultation in Dunedin, Christchurch, Wellington, Palmerston North, Hamilton and Auckland. Insufficient notice was given and the number of attendees dropped to 65. At the Wellington meeting only the author of this document and the Outreach Manager for CSD attended. In Palmerston North only one NZRAG member attended.

For the most recent MBIE/ODI workshops in March/April 2019, again insufficient notice was given for workshops in Auckland, Hamilton, Wellington, Christchurch and Dunedin. Venues were accessible but the meetings were not (some had difficulty hearing speakers due to the lack of a sound system) and catering was miserly. Only 55 actual users attended with a few additional people simply observing some meetings.

The MSD SuperSeniors eNewsletter containing an article about the MBIE/ODI consultation was distributed on 2 April 2019, the day after the last workshop was held.

MBIE's consultation design can be contrasted with that for the Deaf Aotearoa, CCS Disability Action, Hearing New Zealand, T-Meeting technology roadshow carried out over a two week period in July 2018 in Invercargill, Dunedin, Timaru, Christchurch, Nelson, Wellington, Palmerston North, Napier, Tauranga, Hamilton, Wiri, and Auckland that attracted 401 people. Feedback was that if another two weeks' notice had been given there would probably have been another 50 participants in each of Christchurch and Auckland. At the beginning of the roadshow MBIE officials informed that release of an RFP for relay services was 'imminent'. Deaf Aotearoa wrote a summary of the reactions of the roadshow audiences to modern relay services to the then Manager Policy and Programmes, Jane Tier, and soon thereafter MBIE advised that the procurement was paused. A further comment from MBIE was "it can be a mistake to focus on technology early in the process". At the Hamilton workshop in 2019 a newly employed MBIE official stated "We do not want this to be led by technology". Both statements are remarkable in that there is no recognition by officials of the fact that advanced technology actually empowers users to have equivalence of voice communication and that such advanced technology has been developed in response to in-depth focus group feedback.

The following, taken from Engineering New Zealand's e.nz magazine Jan/Feb 2010 may be helpful in this regard:

Desired understanding of technology "purposeful activity to meet societal needs"
Technology is described as "intervention by design". The use of practical and intellectual resources "to develop products and systems that expand human possibilities by addressing needs and realising opportunities".
Technology, says the curriculum statement, is never static; it is influenced by, and in turn effects, the cultural, ethical, environmental, political and economic conditions of the day.

T-Meeting concludes that MBIE officials consistently suppress information on modern services and deride advanced technology to keep the user community uninformed and to massage them into accepting less than a world-class service. We submit that New Zealanders with communications disabilities deserve nothing less than a world's best practice solution and service as residents of a socially progressive first world country.

MED/MBIE officials have a long history of opposing improvements to relay services.

- The Government declined to establish any sort of relay service until the Human Rights Commission ruled in favour of a case brought by Deaf community representatives. It was Labour Government ministers Paul Swain and Ruth Dyson who took the lead.
- Ministry of Economic Development (MED) officials opposed the establishment of a scholarship scheme to train more NZSL-English interpreters at the Auckland University of Technology as a precursor to starting a Video Relay Service (VRS).
- MED officials opposed the creation of a VRS in New Zealand. That opposition was overcome with Treasury's assistance and the call data now exists to demonstrate VRS is the preferred relay service for the Deaf.
- MED officials opposed the introduction of Captioned Telephone Service for hard-of-hearing New Zealanders as a more cost-effective alternative to the Voice Carry-over Service. The then-minister, after listening to non-official advice, ordered the ministry to include CapTel in its service specification. Now, re-voiced CapTel is technologically superseded by an Artificial Intelligence based service but Minister Faafoi does not appear to have received any official advice about that next generation of service to deliver far superior service at a lower price per minute, despite MBIE holding that information. Similarly, the Minister does not appear to have received advice on the use of Artificial Intelligence to convert text to speech for speech-impaired people. Such AI services allow people with communications disabilities to access 111 services directly 24/7/365, which is what the emergency services prefer.

Background to this new phase of consultation

It is heart-warming to read that the consultation work is to achieve one of the goals of the New Zealand Disability Strategy, **Outcome 5 – Accessibility**. We submit that it should also achieve as many as possible of the government's listed 12 priorities, known as "Our plan for a modern New Zealand we can all be proud of" featuring the following:

- **"Grow and share New Zealand's prosperity more fairly"**
- **"Support thriving, sustainable regions"**
- **"Govern responsibly"**
- "Transition to a clean, green carbon-neutral New Zealand"
- **"Ensure everyone who is able to is earning, learning, caring or volunteering"**
- **"Support healthier, safer and more connected communities"**
- "Ensure everyone has a warm, dry home"
- **"Make New Zealand the best place in the world to be a child"**
- **"Deliver open, transformative and compassionate government"**
- "Build closer partnerships with Māori"
- "Value who we are as a country"
- **"Create an international reputation we can be proud of"**

Eight of the twelve priorities are relevant to future relay services.



What happens after we get your feedback

We question how MBIE will develop a comprehensive functional and technical RFP specification that includes the user needs for each sector when its workshops failed to attract any DeafBlind people, only a handful of speech impaired people, and very few hard of hearing people.

Given the lack of subject matter expertise in the MBIE policy team it is imperative that there be user representation on the evaluation panel and that live demonstrations be provided as a part of the evaluation process.



Overview of the proposed changes

We agree with MBIE that in many situations phone calls continue to be the best or only way to contact someone. It is a common mistake to think that apps such as Skype, Viber, WhatsApp, Telegram etc meet the needs of communications disabled people when all such apps are designed primarily for the hearing-oral community. It must also be remembered that the average English literacy of the Deaf population is that of an 8 year old hearing person. However, when communicating using their visual language Deaf are just as articulate as hearing people.

As well as achieving a move to better, more modern video interpreting and relay services, any new service should be **effective, efficient and economic**.

Which services exactly is MBIE proposing to change?

- **Video Interpreting Service**

The primary reason that the service is currently based on Skype is that at the time permanent service was introduced following a trial period that used freeware apps is that there was no knowledge within MBIE at that time of ITU-T standardised total communications solutions and neither was there budget for an end-user licence based service. It is noted that confirmation of extension of the hours of service was made public 8 April.

- **Text based relay services**

Noted.

- **Speech to speech service**

STS users can choose whether a relay assistant revoices all of a conversation or only those parts that the counterpart cannot understand. A key aspect of STS is that it requires no special equipment, calls can be made from any landline or mobile phone.

When Video Relay Service was introduced as a permanent service, Ann Smaill, CEO of Talklink Trust was the speech impaired user community representative on the NZ Relay Advisory Group. Ann advocated for the addition of video to STS so that Relay Assistants could get visual clues as to what the speech impaired person was trying to articulate. This was adopted using Skype in addition to a normal telephone. However, the call setup process was very cumbersome, Sprint only allowed one-way video towards the Relay Assistant and there was only ever one user. With total communications and the queueing of calls received at a modern relay centre into service streams two-way video is always available for STS users if they wish to use it.

What are the proposed changes?

Noted.



Why the changes?

The reason that a large range of different services has been introduced is because MBIE's main source of information on relay services came from its American providers. It was only when the TRS Contracts Administrator began attending NASRA and TEDPA conferences, the inaugural Video Interpreting Symposium at Gallaudet University, and visited regulators or service providers in Australia, UK and Scandinavia that the realisation grew that the American relay market is over-regulated. The over-regulation frustrates the introduction of modern relay services to the USA. Fortunately there is no such regulatory impediment to modernisation in New Zealand.

We are in broad agreement with the change outputs with some exceptions:

- Modern systems use advanced software that must be purchased by the Crown for distribution. Affordability of software and devices is an issue that was flagged in the 2016 draft strategic plan but it appears that no policy work has been done on this aspect. In mid-2018 an MBIE official verbally confirmed that no budget work had been done.
- There has never been a privacy breach from NZ Relay in its 15 years of operation. By introducing a modern service such as Tera text to speech for some speech impaired people and Tera speech to text to replace CapTel the need for an intermediary at the relay centre is removed and call privacy is greatly improved.
- The 2016 draft strategic plan identified the need for MBIE to establish budgets for education and training for each user group. There is no public evidence that this work has been done.

Emergency calls: Make sure you register for 111 TXT

TXT111 is not a true emergency service like the 111 service because it is a non-prioritised store and forward service. The service was established as a result of discussions between Deaf Aotearoa and NZ Police following the murder of Emma Agnew in Christchurch. MED was blindsided by it being announced as an emergency calling service when it is not.

T-Meeting has previously advised MBIE that it has demonstrated a prioritised emergency calling service based on total communications to NZ Police. The use of this technology allows relay users to place 111 calls via relay to the Initial Call Answering Point (ICAP) and thence to the required emergency service and for those calls to be recorded if national policy allows it.

Tera speech to text and text to speech callers can place 111 calls themselves with no intermediary required because artificial intelligence replaces the humans currently required.

T-Meeting's TERA text to speech service allows a speech impaired user to contact 111 directly and to give their location with a timestamp by audio so that the emergency service can see if the location is current. Similarly, TERA's speech to text function allows hard of hearing callers to hear the emergency service's questions which they can respond to using their own voice. Their location can be given as in the case for text to speech. For emergency calls placed via the relay centre, such calls are prioritised through the T-Meeting infrastructure and presented to all logged-on relay assistant workstations. Any free



workstation can process the call. Any busy workstation can put their current call on hold and process the emergency call. At each venue of the Deaf Aotearoa led consortium roadshow in July 2018 there were no objections to this process. A refinement requested was that people on booked VIS calls not be placed on hold but that any interpreter processing an unbooked call take the emergency call. This is easy to accommodate. When an emergency call is answered by a relay assistant the location of the caller is automatically received in a real time text box. Emergency calls can be saved, local regulations permitting, in two files for later replay:

- Audio and video
- Real Time Text

NZ Police has previously requested such recordings from NZ Relay but they were not available.

Today the NZ Relay centre handles emergency calls on a best endeavours basis. However, modern technology coupled with the expertise of the relay assistants allows much better handing of emergency calls by relay and direct calling users.



Change 1: Get you to register as a user

It is discriminatory to require people to register unless the requirement covers disabled and non-disabled communications users equally.

If people register then one may assume that their contact details are correct at the time of registration. However, people's details change over time and the database becomes inaccurate due to deaths, changes of address, ISP changes etc .

Relay users should not have to log in every time they wish to place a call. The app should simply open and the user enter the phone number of the person to whom they wish to speak.

Older people find it difficult to remember passwords, especially when every on-line service provider requests the user to use a different password to all others. Password management systems are beyond the comprehension of many people.

The best that can be done in this regard when licenced software is used for end-users of a standards-based service is to record the user details from an application form (paper or on-line). Obviously the entry of data from paper forms into a non-internet connected PC guards against any on-line database hack. Regular newsletters with tips to users and always encouraging users to inform the service provider of any changes to their contact details works elsewhere.

The registration arrangements used in the USA for VRS and Captioned Telephone Service are cumbersome and were introduced to combat fraud by providers in a multi-provider environment. This is not necessary in New Zealand and represents the unnecessary collection of personal data by government.

It is expected that with a modern system users will be issued with a national telephone number so that they are integrated into the international numbering system. This combined with Call Direct service allows users to call any telephone number and to be called from any telephone number thus removing the 'disability silo'.

The breakdown of calls for the general population (private and business) is, as a rule of thumb:

- 100 local calls
- 10 national calls
- 1 international call

Norway allows international calls to be placed without the need for a calling card. The cost to the state is negligible.

Recording details of licenced users in the way that textphone pool equipment users do today provides all the information that an administrator needs. However, if individual user usage data is required it can be provided by drilling down into the relational database that captures all call data other than call content. This can be done with the current CapTel service, MBIE only has to ask its provider for the information.



MBIE will only really know whether the services are meeting users' needs by establishing close relationships with the many NGOs whose members use relay services.

There is estimated be 3,500 relay users in New Zealand at present. The potential number of users for a well publicised and properly resourced service are:

- Deaf 4,000
- Deafblind 650³
- Hard of hearing 180,000⁴
- Speech impaired 16,000 - 20,000⁵

³ Source: DeafBlind people registered with Blind Foundation/DeafBlind Services. Of this number, 60 use the Braille library.

⁴ Source: Estimate based on NZ and USA populations pro-rated with Rolka Loube data of IP CTS minutes of use in its capacity as Federal Relay Fund Administrator, USA.

⁵ Source: NZ Speech Language Therapists Association plus pro-rated data population data from Sweden



Change 2: Make the Video Interpreting Service more available

This change was already well in progress contractually throughout the consultation workshops but was only announced 8 April after the workshops were completed.

The announced hours of serviced from 1 July 2019 are:

8am – 8pm Monday to Friday

10am – 5pm Saturday

12pm – 5pm Sunday

8am – 9pm Monday to Friday during May and November to support parent-teacher meetings

The above hours during public holidays.

Therefore, It appears that the current supplier of the VIS considers it practical to increase the hours of service. T-Meeting and the NGOs it is working with in New Zealand also find it practical.

Community feedback to T-Meeting is that service hours Monday to Friday should be 7am to 10pm. On all days there should be an out of core hours emergency calling service available, e.g. weekdays 10pm – 7am. If any caller placed a non-emergency call outside core hours then then there must be a sanction placed on that person for a period of time to prevent abuse. Similarly, for the placing of a call to the emergency number as a means of jumping a queue during core hours of service there must be a sanction placed on that person for a period of time to prevent such abuse.

With a cloud based service it is possible to locate NZSL interpreters anywhere in New Zealand that has a VDSL or fibre internet connection. (Note that each TM-PC workstation supports the audio, video and real-time text conferencing of six conference participants). However, there are privacy issues to consider when interpreters or relay assistants work from home rather than from a central supervised call centre location. The logical place for such a centre is determined by the availability of NZSL/English interpreters. Over 50% of qualified interpreters are resident in Auckland. However, there are natural disaster risks to consider in Auckland and the ability to have staff working remotely if required is a strength of cloud based systems.

There is an issue with local sign dialects in New Zealand. Auckland based interpreters that were not originally South Island CODAs for example may not understand southern dialects, requiring the South Island NZSL user to finger spell to explain a sign. It was suggested at the Christchurch workshop that there should be multiple relay centres. T-Meeting does not support this idea because it would be expensive in a small country such as New Zealand. In the event of a natural disaster in Auckland we would activate workstations outside of Auckland until services could be resumed in Auckland.

There are staff welfare considerations that MBIE must take into account when NZSL/English interpreters are faced with handling calls from Deaf that are injured. These considerations have been reported to MBIE in 2010 and hence are not repeated here.

T-Meeting does not see the limited number of NZSL/English interpreters as a significant barrier. Those that work in the service today love it, it makes them better interpreters in



that they must adapt from one conversation to another without any preparation materials and there are employment and remuneration benefits.

Change3: Move to digital text based relay services

What would be different?

T-Meeting supports the use of purpose built multi-media apps that wherever possible remove the need for a relay assistant. We do not support a continuation of legacy text based services as used in the UK, Australia and the USA.

There are two classes of apps:

- Total communications (audio, video real-time text); and
- Complete communications (as for total communications plus AI text to speech and speech to text).

There are different infrastructure and call costs associated with the two apps and hence the correct selection for a particular user is important.

Free calls to landlines and mobiles will be welcomed. As stated above the inclusion of international calling is negligible and saves the administration of calling cards at the relay centre.

We find the statement “ We would also find out about making the different services compatible with assistive technologies that people may use for their disability” to be too vague to sensibly comment on as relentless development may integrate other assistive technologies into total communications or complete communications apps.

Why this change?

MBIE seems to be stubbornly ignoring the issue of affordability even though it has been raised in previous consultation and over a period of many years by the NZ Relay Advisory Group.

Many superannuitants and people living with communications disabilities cannot afford devices such as smartphones, tablets or PCs. Neither can they afford the necessary broadband to support their communications needs. Deaf who use NZSL in particular have a high need for video and hence high data plans. The current Skype based VIS with VGA resolution (800*600) requires at least 512kbit/s bidirectional yet many Deaf try to use aDSL connections. The result is that the Deaf person clearly sees the NZSL/English interpreter at the relay centre but the image presented to the interpreter is poor or unusable due to the aDSL upload speed. VDSL, fibre or 4G is essential for a good experience. T-Meeting recommends 512kbit/s bidirectional for smartphones using CIF and 1024kbit/s bidirectional for HD video on tablets and PCs.



People requiring video need large data plans.

Tera speech to text users can use aDSL and do not need high data caps. 300MB of data per month would suffice for many.

Software based services on mass market devices are constantly improving. For example T-Meeting has recently made improvements for DeafBlind including:

- Continuously variable zooming of all icons and text with no overlapping;
- Making the call history (dialled, received, missed) readable in Braille;
- Making the text pointer always start at the left and when the counterpart types the pointer only moves at the speed at which the DeafBlind persons reads from their Braille device (no changes to the RFC4103 RTT protocol itself were necessary to achieve this).

The UK does not have a Video Relay Service and its text based relay cannot be considered modern. The service has never been put to RFP due to the regulatory arrangement put in place by Ofcom at the time of operational separation that BT will provide the service.

The Australian NRS has, sadly, taken a great leap backwards recently due to advocacy by the telecommunications industry that it did not want to pay for the relay service. An arbitrary cap of AUD22m was set by politicians and services have been cut. The outreach must now include information on main stream services. It is notable that there is no listed telephone number for the Telstra Head Office in Melbourne. One can only communicate by email. That speaks volumes. There has only been one service provider in Australia for some 26 years. The Australian government's tendering process has precluded the participation of overseas providers on the last three occasions that an RFP has been issued.

T-Meeting questions why MBIE does not mention ITU-T standardised total communications systems in its consultation document?

It would be helpful if MBIE not just concentrate on informing people of the proprietary apps used in the UK and Australia but also inform people that apps based on ITU-T international standards are used in e.g. France, Norway, Sweden, Holland, Israel, Japan and Saudi Arabia to support all user groups. In Canada ITU-T total communications is used in VRS. Some other European countries together with two South American countries are looking to either re-introduce standards-based apps from a reliable supplier or commence a relay service with them to skip over legacy technologies.

The use of international standards aligns with the Government Procurement Rules Rule 27: Technical Specifications 2.b Where appropriate, *technical specifications must* be based on international standards where they exist, otherwise the appropriate New Zealand technical regulations, standards or building codes.

A modern relay service integrates communications disabled users into the international telephone numbering plan for easy two-way calling and hence adherence to ITU-T and IETF standards is logical.



T-Meeting agrees that there is a low level of knowledge that NZ Relay and the services it offers ends after 15 years of service by Sprint. However, the upside is that with a new provider and modern technology tens of thousands of people can be helped without the need to write-off equipment.

Change 4: Phase out CapTel equipment

What would be different?

The obvious question is: Why is CapTel still being promoted on MBIE's behalf when the plan is to phase it out?

There is a charge of \$323⁶ for a user to rent a CapTel 840i telephone. With the phasing out of CapTel will those who paid \$323 be refunded?

The background to the \$323 charge is that MED did not have sufficient textphone pool budget to cover the capital cost of the CapTel 840i telephones and the depreciation of those telephones. Following the Global Financial Crisis budgets were slightly reduced and the author of this submission is unaware that any action was taken to restore budgets later.

Why this change?

We agree that there is a far better alternative for Captioned Telephone Service in the form of T-Meeting's Tera speech to text service. Captioning is virtually instantaneous, removing the issue that CapTel users experience of at least a 2 second delay between audio being received and corresponding captions being delivered. In the trade-off between speed and accuracy evidence is emerging that speed is the more important factor.

It is recommended that all active CapTel users be identified by MBIE. This can be done by asking Sprint for a report on the active users during the past 3 months as all calls from a CapTel phone include the unique ID of the 840i phone. This will help to identify users who no longer use their CapTel phone. For users whose phones are inactive during a 3 month period, public records can be searched to identify whether the person is alive or deceased. Active users can then be contacted to transition them to a new service on 1 July 2020. No benefit is seen in supporting CapTel beyond 30 June 2020 due to the cost of supporting and delivering this outdated service.

It is T-Meeting's understanding that CapTel infrastructure is licenced to a particular provider and is not transferable. In New Zealand, Sprint and ACE have non-exclusive licences to supply CapTel. Australia, according to information on the NRS website now only supports Captioned Telephone Service on tablets and notes a delay of a few seconds between delivery of audio and captions. T-Meeting understands that Nuance software is now used in Australia.

⁶ See <https://www.captel.co.nz/Apply>



Change 5: Stop using teletypewriter (TTY) equipment

What would be different?

We do not understand why MBIE would enter into a contract for modern relay services commencing 1 July 2020 and retain legacy TTY, HCO and VCO services until 30 December 2020. The users of these services are known by the current provider and through textphone records. All current users can be approached, provided with equipment, software and training to transition on 1 July 2020. To do otherwise will unnecessarily increase costs.

We recommend that legacy TTY users be provided with modern end-user equipment as that is more cost effective than retaining some legacy relay assistant workstations to process TTY calls.



Change 6: Stop speech-to-speech services

What would be different?

It is unclear why 30 December 2020 has been chosen as the date to stop STS and V-A STS services.

There is Tera text to speech service as an alternative, but that does not suit all current STS users, some of whom have mobility or dexterity issues that make the use of keyboards difficult and in some cases painful. The ability of such people to use their voice enables them to communicate using STS.

STS and V-A STS have modern successors in the form of total communications and with TERA text to speech allowing the user to call any number, including an emergency number such as 111 without needing a relay assistant. Location data, with a timestamp of when the location was last captured, can be forwarded on demand as audio from GPS enabled devices such as fit for purpose tablets and smartphones.

Integration of third party pickboard functionality into Tera text to speech is being investigated. T-Meeting is aware that the pickboard products in use in New Zealand require local changes to convert them from American to NZ English.

Why this change?

Although STS is the least used service, it is vital to those people who wish to use their own voice to communicate. People who may prefer to use their own voice include but are not limited to those with:

- Autism
- Brain injury
- Cerebral Palsy
- Head injury
- Motor neurone disease
- Stroke
- Some forms of aphasia

As stated previously there are estimated to be 16,000 – 20,000 people with a speech disability in New Zealand.

The reason that usage is so low is primarily because after 15 years of Sprint service, T-Meeting has found that for example speech language therapists in hospitals are unaware that the STS exists and therefore they cannot recommend it patients.

That there is no national organisation solely dedicated to helping speech disabled people is another factor. T-Meeting has moved to address this issue by reaching out to numerous organisations that help speech impaired people.

Another factor is funding for awareness, promotion and in-home support. It has been found that if a person fearful of using the telephone based on their past experiences is gently encouraged to make two – three calls via the relay service that they gain confidence to make further calls knowing that they will not be verbally abused. It is recommended that there be a specified amount in any new contract specifically for this purpose. Note that in the USA the Federal compensation rate for Speech to Speech is higher for this reason.

Poor promotion of relay services has been an ongoing issue in New Zealand for many years. With the contracting of CSD for the VIS there was a marked improvement in the quality of the website, outreach collateral, social media engagement and staffing to promote the VIS. It is submitted that:

- Promotion of relay and direct services nationally is too big a job for one person;
- One person cannot be relatable to all user groups. Deaf should promote services for Deaf, hard of hearing to hard of hearing etc.
- Expert creative support attuned to the New Zealand audience must be provided to those fronting the programme in terms of copywriting, graphics, presentations etc.
- Separate budgets for this work should be established by MBIE and declared in any future RFP so that bidders know MBIE's expectation and can devise a programme to best utilise the funds available.
- There should be annual reviews of promotion activities and a willingness to change direction if necessary based on results achieved.

The messaging to the communities will be vastly simplified if there is one F.703 or better complete communications application that can be tailored to the sensory needs of individual users. The allocation of a telephone number to relay users and the introduction of Call Direct for Deaf will make calls from hearing-oral people to relay users as easy as making a telephone call to anyone else.

It is recommended that the Policy and Programmes team enlist expert help from the MBIE Communications team as a first step in remedial action on service promotion. The setting of realistic promotion and support budgets by MBIE and the declaration of them will help overcome overall bid price disparities of more than 2:1 that have occurred previously. The VIS RFP and resulting contract demonstrates the efficacy of the recommended approach. MBIE got more service and better promotion for its money as a result because proponents were not left guessing what the budget was.

Given the very small turnout of speech impaired people to MBIE's consultation meetings the sample size is too small to base an important decision on such as stopping the STS service.



Addressing other barriers to access

Other barriers to using video interpreting and relay services

Costs of connectivity, equipment and using voice services have been identified as barriers to using the relay service for many years but MBIE officials have apparently not yet moved to address the issue with targeted assistance or to explore it with their Minister.

The feedback described was provided in the 2010 consultation. Officials have declined to do anything about it, partly because the Telecommunications Relay Service is a Telecommunications Service Obligation and any change requires ministerial approval. There has been reluctance to write the required briefings to the Minister. There is no reason that any new relay and direct services contract should be declared a TSO instrument as to do so adds another layer of cost through the Commerce Commission for no output benefit.

Affordability of internet access is an issue for users. This can be alleviated by targeted assistance.

Devices are one part of the accessibility equation. The other is software that meets the needs of users with a range of hearing, speech and vision loss as well as Deaf.

Anecdotally, many Deaf and other relay users do not have mobile data plans and only use smartphone features when in a free Wi-Fi area. It is not known if SIP services (the foundation of total/complete communications) are generally accessible in free Wi-Fi areas. Home Wi-Fi routers must have SIP ALG turned off to allow unencrypted SIP traffic through. By using Transport Layer Security encryption as the first choice in a call set-up T-Meeting users can communicate through routers with SIP ALG on. If the called party does not support encryption then the call reverts to being unencrypted.

As has been pointed out in the 2016 draft relay strategic plan, The NZ Government has All of Government (AoG) contracts for items like PCs, tablets and smartphones. It has been previously pointed out to MBIE that the lowest cost method of getting devices with adequate power, memory and screen size into the hands of relay and direct services users would be to utilise such AoG contracts in cooperation with an equipment distribution provider. However, there is no mention of such cost lowering innovation in MBIE's consultation document. There is little point in New Zealand moving to a world's best practice relay service if people cannot afford to access it.

An alternative distribution method is to use coupons that can be redeemed at any retail outlet for hardware according to the user's needs, e.g. iPad + stand or external Bluetooth keyboard etc.

In Sweden almost all municipalities prescribe all in one, software and hardware (Laptop PC or tablets/mostly iPads), except for the Skåne municipality, where they issue software but the user also gets a coupon with a monetary value that they purchase the hardware with. All other municipalities and the Norwegian Labour and Welfare Administration provides the



user with hardware as well, including if they need extra accessibility, like an iPad holder with external keyboard, headset etc. The goal is to meet all of the user's needs because that makes it easier to use the technology, not only the software as such, but the hardware as well. If it is made as easy as possible to use then it will be used is our experience. Several U.S. states also use a coupon method of equipment distribution. Inclusiveness in society is important and the probability to get a well-paying job is improved. Users are moved from welfare takers to welfare contributors. This is the essence of why Sweden at first glance appears to be overly generous but is actually saving a lot of money by investing in disabled people. In the end, it is win-win, for both disabled users and the government if all cost benefits are included. Grant Cleland's presentation mentioned elsewhere in this submission makes this abundantly clear in the New Zealand context. Approximately 95% of Swedish users use the software on iPad because of the stability of the devices.

The presentation by Grant Cleland, CEO of Workbridge, "Achieving Employment for Disabled People, Like Everyone Else" delivered at the NZDSN National Employment Symposium with the theme "Why Work Matters" in August 2017⁷ sets out the costs and benefits of getting those disabled persons who want to work into work and showing a \$1b boost to the economy⁸ is a more sophisticated measurement than "value for money" widely recognised as bureaucratise for "cheapest".

It is recommended that MBIE consider the data volumes that a Deaf NZSL user would require to enable reasonable use of CIF video at 512kbps on a smartphone or HD video at 1.5Mbps on a tablet. 2GB of data lasts less than 3 hours for HD video.

If MBIE officials had spent as much or more time liaising with NGOs as it has with other government agencies it would have a far better grasp of the needs of the relay user community. As it is, there has been little engagement with and understanding of the relay user community and its needs on the context of what modern technology can do to enhance their working and private lives. It is therefore imperative that any RFP evaluation panel include user representatives as was the case with the Textphone Advisory Panel formed to assist with equipment selection in 2003. Without the expertise of that panel serious mistakes would have been made.

That MBIE will not address the issue of affordability because of other things happening across government is an abrogation of its responsibility and effectively kicking the can down to road if it is not prepared to raise the vital issue with its minister.

⁷ See: <https://www.nzdsn.org.nz/national-employment-symposium-2017-presentations/>

⁸ Quoted by Hon. Iain Lees-Galloway, Minister for Workplace Relations, on TV1 News 17 February 2018



We will publish some feedback

T-Meeting requests that all submissions in response to the MBIE/ODI consultation document be published, as they were for the Public Consultation Document New Zealand Telecommunications Relay Services Beyond June 2019. T-Meeting's response to that document is available here:

<https://www.dropbox.com/s/v56nkxplso5vjzp/Submission%20in%20response%20to%20MBIE%20consultation%20document%20NZ%20Telecommunications%20Relay%20Services%20Beyond%20June%202019Rev%20F.docx?dl=0>

T-Meeting requests that this submission be published in its entirety on the MBIE website. We believe this is consistent with the current Government's approach to open and transparent government.



Additional issues which must be addressed to overcome shortcomings with the current service arrangements

User representation

The NZRAG has been a very useful source of feedback and input to MBIE in particular since 2004. However, T-Meeting understands from DPOs and service providers that serve the Deaf, hard of hearing, deafblind and speech impaired communities of users that it would be more representative if the DPOS and service providers made up the Advisory Group rather than individuals. Such a change would make it possible for a much wider group of users to be informed of issues under consideration by MBIE or the relay/direct services provider and equipment distributor. NGOs or service providers could canvass their memberships on issues and provide advice to MBIE on a much stronger basis than is currently possible.

Governance

The current TRS and VIS services are a minor part of the responsibilities of the Policy and Programmes group in MBIE and historically are given low priority. Although MBIE could attend e.g. NASRA and TEDPA conferences to establish relationships with peers and the FCC it has chosen not to do so since 2016. Other invitations that would enable policy analysts to gain in-depth knowledge of current developments have been declined. Close connections have not been forged with the relevant NGOs and service providers by the policy analysts working on relay matters. It is felt that the services, whether they involve a relay assistant or whether they be direct using modern technology should be governed by a Board comprising the CEOs or senior office holders from e.g. Deaf Aotearoa, Hearing Association of New Zealand, CCS Disability Action, Deafblind Services and others. Such a Board would bring expert knowledge of the sectors to be served to the running of the service. The Board could bring all of its membership resources to bear on raising awareness of services and delivering support to their members given appropriate funding from MBIE to deliver such services.

Promotion of services

The promotion of relay services in New Zealand by the Service Provider has not been successful. One reason is that the job is simply too big for one person.

The proposed Board will have knowledge accumulated over many years of the most effective ways to get information to their memberships and to elicit feedback on issues.

Each DPO and NGO has existing networks, copy writers, graphic artists etc skilled in presenting information to their audiences.

Promotion of services needs to be segmented into:

- Deaf
- Deafblind



- Hard of hearing
- Speech impaired
- The general hearing-oral public

Then, people relatable to each community can make presentations and deliver in-home support. As an example, it is not possible for a hearing sighted person that does not know Braille to deliver effective and efficient training to a Deafblind user. However, a Deafblind person already familiar with the blind accessibility features of an iPad for example would quickly become proficient in the use of T-Meeting TERA and be able to teach other deafblind.

This is an area that can be expanded upon in any future RFP response.

In-home support

Some in-home support has been provided under the current TRS Deed. However, the budget for it is unknown as it is at the whim of the Provider.

In-home support is critical, especially for elderly and low income persons who may not have had access to the internet previously and are unfamiliar with things like Wi-Fi password setting or even what terms such as modem, router, Wi-Fi or mobile data means.

It is important that in-home support be funded by a specified amount. MBIE could consult ODI and Workbridge to find what a suitable budget amount should be given the size of each user group.

Inclusion of direct services

The consultation paper is focussed on relay services and overlooks direct services that are delivered by T-Meeting's TERA at significantly lower cost than relay services that require a relay assistant.

The launch of TERA in Sweden has shown that excitement in all user groups is building rapidly as they realise that TERA allows them to make calls directly with no relay assistant involved or they can still place calls via the relay centre if that is what they are most comfortable with. Direct access to emergency services using the text to speech and speech to text functionality couple with location information is seen as a huge improvement in comparison to using legacy TTY and fax services. Finally, communications impaired persons are able to access emergency services like 111 in the same way that hearing-oral persons do.

Contract flexibility

The writer of this submission advocated for a 5 + 3 year TRS TSO contract term to minimise procurement effort and cost. Experience has shown that the structure of the resulting Deed and Addenda has precluded the introduction of new technology in a simple manner. It is recommended that any new contract have provision for a continuous improvement



programme to be included so that the overall service delivery does not stagnate and that there be flexibility to negotiate the price of agreed improvements as they become available.



Provisional distribution of this submission

MBIE Relay Consultation

Rt. Hon. Jacinda Ardern, Prime Minister

Hon. Grant Robertson, Minister of Finance

Hon. Kris Faafoi, Minister for Broadcasting, Communications and Digital Media

Hon. Carmel Sepuloni, Minister for Disability Issues

Hon. Tracey Martin, Minister for Seniors

Paula Tesoriero, MNZM, Disability Commissioner

Hon Iain Lees-Galloway, minister for work and Industrial Relations

Hon. Winston Peters, Minister for Foreign Affairs

Hon. Willie Jackson, Minister for Employment

Hon. David Clarke, Minister for Health

Hon. Julie Ann Genter, Associate Minister for Health

Hon. Chris Hipkins, Minister for Education

Ruth Dyson, MP, former Minister for Disability Issues

Autism New Zealand

Blind Foundation/DeafBlind Services

CCS Disability Action

Cerebral Palsy Society

Deaf Aotearoa

Hearing New Zealand

Life Unlimited

New Zealand Hearing Therapists Association

New Zealand Speech Language Therapists Association

Stroke Foundation NZ