

January 2016

<u>Delivery against General Condition 15.5 criteria</u>	
<i>A Relay Service provided by the Communications Providers to its Subscribers pursuant to paragraph 15.3 must:</i>	
• provide facilities for the receipt and translation of voice communications into text and the conveyance of that text to the terminal of End-Users of any provider of Publicly Available Telephone Services and vice versa,	✓
• provide facilities for the receipt and transmission of voice communications in parallel with text communications, allowing both channels to work in tandem to deliver near synchronous voice and text;	✓
• provide facilities for access to Emergency Organisations;	✓
• subject to General Conditions 3 and 13.1, be available for lawful use by End-Users at all times;	✓
• be capable of being accessed by End-Users of the service from readily available compatible terminal equipment, including textphones, Braille readers, personal computers and mobile telephones;	✓ ¹
• not prevent End-Users from communicating with other End-users of other approved Relay Services;	✓
• provide facilities to allow End-Users, who because of their disabilities need to make calls using a Relay Service, to receive incoming calls via the Relay Service, without the calling party needing to dial a prefix;	✓
• insofar as reasonably practicable, allow for communication between End-Users of the service at speeds equivalent to voice communications;	✓
• take measures to ensure the confidentiality of communications between End-Users of the service.	✓

¹ BT provided a commitment to Ofcom to deliver Braille reader compatibility for equipment accessed using the app for windows PCs and laptops, by 1 October 2015. This has been completed and independently tested.

Approval Criteria and KPIs	
<p>Ability of the relay service to meet the requirements of General Condition 15.5</p>	<p><u>Provisional conclusions on approval criterion 1</u></p> <p><i>A2.6 Ofcom has reviewed the information and undertakings in detail and, subject to consultation responses, our provisional view is that the NGTR service proposed by BT will fulfil the requirements of General Condition 15.5. Of particular importance in this regard is BT’s confirmation regarding continued accessibility for textphone users, the confidentiality of caller communications, appropriate network resilience and priority access to the emergency services for relay calls.²</i></p>
<ul style="list-style-type: none"> • The relay service provider must provide an NGTR service fulfilling the relevant requirements in General Condition 15.5. 	<p>The BT NGT service is available for use at all times, subject to proper functioning of the network and matters beyond our reasonable control. BT does not have any control over whether or not an end-user is able to make a call using the BT NGT service. This is the responsibility of the Originating Communications Provider. The BT NGT service connects all calls presented to it by Communications Providers. However, the Communication Provider originating the call is responsible for controlling and billing the calls that their customers make.</p>
<ul style="list-style-type: none"> • The provider must ensure that in its NGTR service calls to the emergency services are prioritised and provided by a resilient network and system. 	<p>Within the BT phone network 18000 has the same priority as 999 and is routed as such, however BT can only confirm that this is the case within BT’s own network. BT as a Communications Provider provides services to end-users in compliance with General Conditions 3 and 13.1 and makes no distinction between a customer using Text Relay and one who does not. BT cannot confirm this for other Communications Providers.</p>
<ul style="list-style-type: none"> • Conversations facilitated by the relay assistant should only be recorded, or parts of the conversation noted, where required for justifiable operational reasons e.g. an emergency call; cases of criminal activity, for quality measurement training. 	<p>BT confirms compliance with this approval criterion. Call monitoring and quality of service activity with all relay assistants conforms to this requirement and takes place at least quarterly in compliance with the current KPIs.</p>

² Extracted from Ofcom’s 6th March 2014 statement: Next Generation Text Relay - Approval of a text relay service

Approval Criteria and KPIs	
<p>Guarantees regarding the operational effectiveness of the relay service</p>	<p><u>Provisional conclusions on approval criterion 2</u></p> <p><i>A2.14 Ofcom has reviewed the information and undertakings provided by BT, and upon which Ofcom relies, in relation to the operational effectiveness of the proposed NGTR service. Ofcom also notes BT’s track record of providing the existing text relay service. Subject to consultation responses, we provisionally consider that the arrangements described by BT provide sufficient guarantees regarding the operational effectiveness of the proposed NGTR service.³</i></p>
<ul style="list-style-type: none"> The provider must ensure there are sufficient funds, facilities and staff to provide the relay service and enable it to perform properly the administrative and technical work associated with the tasks for which it has been appointed. 	<p>Details of BT’s Text Relay performance is published at www.ngts.org.uk.</p> <p>Financial information about BT is included in our published annual report⁴.</p> <p>We staff the BT NGT service to ensure we meet the PCA and relevant KPIs. BT also ensures there is sufficient physical infrastructure to accommodate staff, technical systems and expansion should this become necessary.</p>
<ul style="list-style-type: none"> The provider must ensure that staff are appropriately and adequately trained especially in the communications needs of deaf, hearing impaired, speech impaired and deafblind textphone users. 	<p>BT’s recruitment programme ensures that all potential candidates can type at a minimum speed of 40 wpm with 98% accuracy.</p> <p>Our training programme focusses on customer care and contains a variety of modules designed to equip our people with the right skills to communicate effectively with all Text Relay users, including those who may have never experienced a relay call before.</p> <p>Typing speed and accuracy are both monitored as part of each Text Relay Assistant’s regular quality reviews. The cumulative result is reported within the published KPIs at Annex 1 of this document.</p>
<ul style="list-style-type: none"> The provider must ensure that the systems have sufficient technical resilience and back up resources to provide an uninterrupted service to the same extent as the voice telephony networks to which it is interconnected. 	<p>BT uses independent text nodes situated on geographically separate sites with each text node having multiple connections into BT’s interconnected network.</p>
<ul style="list-style-type: none"> The provider must ensure that users receive call progress announcements in voice for hearing users and in text for hearing impaired users. 	<p>BT confirms this is in place.</p>
<ul style="list-style-type: none"> The provider must ensure that adequate measures are in place to ensure that the relay service is inter-operable with other approved relay services (where applicable) such that end-users are able to use the service to communicate with users of other relay services. 	<p>BT is the only approved provider of Next Generation Text Relay in the UK. BT has implemented the NGT service in accordance with UK telephone communications interoperability standards. Should Ofcom approve another NGTR service, interoperability with the BT NGT exists where this is feasible, subject to the technical and interoperable capability of the new service.</p>

³ Extracted from Ofcom’s 6th March 2014 statement: Next Generation Text Relay - Approval of a text relay service [http://media.ofcom.org.uk/news/2014/ofcom-approves-bts-next-generation-text-relay-service/]

⁴ <https://www.btplc.com/Sharesandperformance/Annualreportandreview/2015summary/>

<u>Approval Criteria and KPIs</u>	
KPIs	<p><u>Provisional conclusions on approval criterion 3</u></p> <p><i>A2.17 BT has informed Ofcom that its proposed NGTR service will be capable of satisfying the KPIs set out in figure 2 on an ongoing basis (as it must). Having reviewed all of the information and undertakings provided, subject to consultation responses, we provisionally consider that this criterion is satisfied. We will work with BT as it develops the ways to monitor staff performance and will monitor BT to ensure the changes take place and are published. We will also monitor the performance of the service against the KPIs on an ongoing basis.⁵</i></p>
<ul style="list-style-type: none"> The provider must ensure that it and the NGTR service it provides are capable of satisfying on an ongoing basis the required KPIs, including that it is adequately staffed at all times. See table 1 below. 	See tables 1, 2, 3 and 4 at Annex 1 of this document

⁵ Extracted from Ofcom’s 6th March 2014 statement: Next Generation Text Relay - Approval of a text relay service [http://media.ofcom.org.uk/news/2014/ofcom-approves-bts-next-generation-text-relay-service/]

Approval Criteria and KPIs	
<p>Accountability and transparency regarding the performance of the service</p>	<p><u>Provisional conclusions on approval criterion 4</u></p> <p><i>A2.23 BT has confirmed that it will meet each of the requirements under this criterion. On that basis, subject to consultation responses, we provisionally consider that the requirement of accountability and transparency regarding the performance of BT's proposed service is satisfied. Further, on the basis of the information and undertakings BT has provided to us, our provisional view is that the proposed NGTR service will be capable of meeting the approval criteria on an ongoing basis (as it must).⁶</i></p>
<ul style="list-style-type: none"> The provider must publish and make available to Ofcom, every quarter, detailed and transparent reporting on its operation, based on the KPIs. 	<p>KPIs for Quarter 3: October – December 2014, Quarter 4: January – March 2015, Quarter 1: April - June 2015 and Quarter 2: July - September 2015, Quarter 3: October – December 2015 are published on the NGTS website.</p>
<ul style="list-style-type: none"> The provider must publish an annual report covering compliance with these approval criteria and any related issues directed by Ofcom. 	<p>BT published the NGT Annual Report in October 2015 and will publish every 12 months thereafter for the lifetime of the current, approved BT NGT service</p>
<ul style="list-style-type: none"> The provider must have a complaints handling procedure in place – to be agreed by Ofcom – and ensure complaints are handled in a fair and timely manner. 	<p>The BT NGT complaint handling procedure is published on www.ngts.org.uk at: Things you need to know⁷</p>
<ul style="list-style-type: none"> The provider must carry out customer satisfaction surveys at least every two years. 	<p>The BT NGT service launched in October 2014. BT will conduct customer satisfaction research by October 2016.</p> <p>BT will work with Ofcom and key stakeholders in the coming months to agree the best approach for how to conduct this activity effectively.</p>
<ul style="list-style-type: none"> The provider must satisfy all elements of the criteria set by Ofcom for approval on an ongoing basis. Failure to satisfy all elements, once approval has been given, may result in the withdrawal of approval by Ofcom. 	<p>Ofcom confirmed BT's compliance with General Condition 15.3ⁱ and 15.5ⁱⁱ in March 2015.</p>

⁶ Extracted from Ofcom's 6th March 2014 statement: Next Generation Text Relay - Approval of a text relay service [http://media.ofcom.org.uk/news/2014/ofcom-approves-bts-next-generation-text-relay-service/]

⁷ http://ngts.org.uk/tyntk_index.php

ANNEX 1

BT NGT REPORTED KPIS

Table 1				
Key Performance Indicators: Quarter 3 2015/16				
Measure	Target	Actual achieved		
		OCT 15	NOV 15	DEC 15
Standard relay calls answered within 15 seconds	>= 90% on average	91.18%	90.32%	88.91% ⁸
	>= 85% per 15 minute interval ⁹	93.75%	88.54%	83.33%
Emergency relay calls answered within 5 seconds	>= 95%	98.11%	97.56%	96.33%
Customers surveyed expressing dissatisfaction with the relay service	< 5% customers dissatisfied	-	-	-
Standard relay calls abandoned ¹⁰	< 3% Standard Calls Abandoned	1.39%	1.36%	2.20%
Emergency calls abandoned. This is in line with the standard voice service measure	< 2% Emergency Calls Abandoned	0.40%	0.33%	0.57%
Relay assistants to be monitored at least quarterly for speed of transcription, accuracy and process conformance	>= 94% of calls handled correctly	99.20%	99.90%	99.10%
In conversation voice to text transcription speed for standard/emergency relay calls, per call ¹¹	>= 40 words per minute (wpm) (when the user is able to receive 40wpm or faster)	98.75%	98.10%	97.06%
In conversation voice to text transcription speed for standard/emergency relay calls	>= 60 wpm averaged across calls	76.68	77.20	76.27
Average voice to text transcription accuracy	>= 98%	99.24%	99.36%	99.13%
Complaints relating to the relay service	< one complaint per 1000 calls	0.11	0.14	0.15
Total calls to be subject to a relay assistant handover	< 2% of total calls	0.43%	0.50%	0.54%

⁸ Workload was 8% above anticipated levels which is unusual for this time of year, but may indicate a positive uplift in usage that we hope will continue and will resource as required. In addition to the increase in workload, we suffered an unplanned site evacuation which resulted in contingency measures having to be implemented. Appropriate action has been taken to ensure we are able to maintain service levels should the demand continue to increase beyond expected levels.

⁹ This KPI demonstrates consistency of performance across each 24 hour period and limits the opportunity of long periods of poor performance being masked with one period of really good performance.

¹⁰ "Abandoned" means that the call is ended by the caller before the relay assistant is brought in.

¹¹ Figures based on relay assistant sessions where the average WPM is 41WPM or better, data not logged currently for individual calls

All measures except for “>40 wpm” to be averaged over a monthly period

ⁱ General Condition 15.3 The Communications Provider shall ensure that such of its Subscribers who, because of their disabilities, need to make or receive calls in which some or all of the call is made or received in text format, are able to access and use a Relay Service, including the receiving of calls made by End-Users irrespective of whether such End-Users have a disability. Such Subscribers and End-Users, as the case may be, shall be charged for the conveyance of messages to which a Relay Service applies at no more than the equivalent price as if that conveyance had been made directly between the caller and the called person without use of a Relay Service. In making such charges, the Communications Provider shall apply a special tariff scheme designed to compensate Subscribers who, because of their disabilities, need to make calls to which a Relay Service applies for the additional time to make telephone calls using a Relay Service.

ⁱⁱ General Condition 15.5 By no later than 18 April 2014 a Relay Service provided by the Communications Provider to its Subscribers pursuant to paragraph 15.3 must:

- (a) provide facilities for the receipt and translation of voice communications into text and the conveyance of that text to the terminal of End-Users of any provider of Publicly Available Telephone Services and vice versa,
- (b) provide facilities for the receipt and transmission of voice communications in parallel with text communications, allowing both channels to work in tandem to deliver near synchronous voice and text;
- (c) provide facilities for access to Emergency Organisations;
- (d) subject to Conditions 3 and 13.1, be available for lawful use by End-Users at all times;
- (e) be capable of being accessed by End-Users of the service from readily available compatible terminal equipment, including textphones, Braille readers, personal computers and mobile telephones;
- (f) not prevent End-Users from communicating with other End-users of other approved Relay Services;
- (g) provide facilities to allow End-Users, who because of their disabilities need to make calls using a Relay Service, to receive incoming calls via the Relay Service, without the calling party needing to dial a prefix;
- (h) insofar as reasonably practicable, allow for communication between End-Users of the service at speeds equivalent to voice communications;
- (i) take measures to ensure the confidentiality of communications between End-Users of the service;
- (j) comply with any directions in respect of the service which Ofcom may make from time to time; and
- (k) be approved by Ofcom for the purposes of this Condition 15.5.