



**MINISTRY OF BUSINESS,
INNOVATION & EMPLOYMENT**
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New Zealand Telecommunications Relay Services Beyond June 2019

Submissions Summary Report

Overview

Public consultation

1. Through its contracted providers, the Government provides a Telecommunications Relay Service for deaf, hearing impaired, speech impaired and deafblind New Zealanders. The current contracts for the provision of this service are due to expire on 30 June 2019.
2. The Ministry of Business, Innovation and Employment (MBIE) conducted public consultation in order to ascertain what services and equipment are required to meet the needs of users beyond this date, and how they may need to change in light of technological developments. The consultation period opened on 20 February 2018, and was announced by a joint press release from Hon Clare Curran, Minister of Broadcasting, Communications and Digital Media, and Hon Carmel Sepuloni, Minister for Disability Issues.
3. MBIE released a public consultation document on its website, as well as a shorter summary document and a video translation of the summary document into New Zealand Sign Language (NZSL)¹. Respondents could make written submissions by post and email, or in NZSL via video. Six public consultation events were held in five locations across New Zealand. Submissions closed on 13 April 2018.
4. We would like to thank all the individuals and organisations who took the time to make a submission during the consultation period. This report serves as a summary of the submissions received, which will inform the Request for Proposals for relay services in New Zealand beyond June 2019.

Policy objectives

5. MBIE's objective in procuring relay services beyond June 2019 was formulated in consultation with the New Zealand Relay Advisory Group, an independent group established alongside the relay service to provide service and technical feedback, offer suggestions on outreach opportunities and provide feedback for possible product enhancements.
6. MBIE's objective is to:

Ensure the New Zealand Relay Service meets the needs of users in facilitating the accessibility of deaf, hearing impaired, speech impaired and deafblind people in New Zealand society and the economy.

¹ <http://www.mbie.govt.nz/info-services/sectors-industries/technology-communications/communications/telecommunications-relay-service>

7. Four guiding principles were developed under this objective. We want to ensure the relay service is:
 - **Available:** to those who need it, when they need it, regardless of where they live
 - **Accessible:** widely known, easy to access and straightforward to use
 - **Affordable:** for users whilst offering value for money for the Government
 - **Fit for purpose:** compatible with mainstream technologies and networks and keeps pace with technological advancements.

Submissions received

8. We received 24 submissions, all of which were in written form and submitted via email. A summary table of respondent information is attached at Appendix A.
9. There was a near even split of submissions from individuals and from organisations, including one vendor. The majority of individual respondents identified as deaf.
10. There was a good spread across age brackets for the individual respondents and a good geographical spread across New Zealand. Auckland and Christchurch were the most common areas of residence for respondents.
11. Respondents indicated that they use relay services for a mix of social, personal and business purposes. Those who used at least one of the relay services tended to use it every day or several times per week. Respondents who indicated that they use multiple relay services tended to either use certain services for certain purposes, or preferred one service but use others outside the hours of availability for their preferred service. Most respondents indicated they were unaware of one or more of the services offered.
12. The public consultation events featured group discussions around the questions in the public consultation document under each of the four guiding principles set out above. Feedback from these discussions has been incorporated into this report, and for consistency attendees at these events have been referred to as 'respondents'.
13. MBIE notes inherent limitations in the public consultation process in that respondents were self-selecting, and individuals from one user community made up the majority of individual respondents.

Submissions Summary

14. Most respondents commended relay services, particularly the Video Interpreting Service (VIS), as a valuable resource that is of critical importance to the daily lives of those with communications disabilities. However, submissions also indicated that there are many key areas in which the provision of services could be improved, outlined under the four guiding principles as follows:

Availability

Hours of Service

15. The majority of relay services are available to users on a 24/7 basis, ensuring access to a wide range of communications at all times. However some services, including VIS, have limited hours of service (8:00 am to 8:00 pm, Monday to Friday).
16. Respondents highlighted the importance of services being available after business hours and on weekends, particularly for urgent and emergency situations. VIS users in particular voiced concerns about not being able to make calls in NZSL, which is the first and/or preferred language for many users, outside the VIS hours of operation.
17. Questions remain over the commercial viability of extending the hours of services that are not currently available on a 24/7 basis. Several respondents suggested the issue could be addressed by relay assistants and video interpreters working remotely, which could reduce operating costs and allow for extended hours of service. If this was to be implemented in the future, considerations around the immediate back-up and supervisory support currently provided through a single contact centre would need to be addressed.
18. Another possible solution raised during the consultation is the potential introduction of voice recognition software, resulting in less reliance on human operation of services and the possibility of an autonomous service operating 24/7. We have been following technological developments in this space, and would welcome responses to the upcoming Request for Proposals incorporating voice recognition or other next generation software.

Accessibility

Promotion and Awareness of Services

19. The promotion of relay services is currently the responsibility of two dedicated Promotions Managers – one for each contracted provider, Sprint and Communication Service for the Deaf (CSD). The Promotions Managers undertake outreach and community engagement work, and manage social media pages that promote relay services. Videos and other collateral have been produced to promote relay services and the benefits they offer users.

20. While respondents were largely supportive of the work of the Promotions Managers, several highlighted the importance of promoting services to the hearing community as well as the user communities. This includes key services such as banks and hospitals, which members of the user communities have identified as particularly unfamiliar with relay services.
21. Respondents also highlighted a need for information on how to use relay services to be readily accessible to users. Despite an option checker on the homepage of the NZ Relay website to help users identify the service that will be most appropriate for them, and step-by-step instructions in written form on the NZ Relay, CapTel and VIS websites, respondents indicated these measures may not be going far enough to address the reluctance of many to commence using relay services.
22. It was suggested that video demonstrations would go a long way to addressing concerns around information on how to use services. In-home demonstration visits or 'satellite' roadshow demonstration booths in regional centres were also suggested, although both of these would presumably be relatively costly to the service provider.
23. It was suggested that the task of promoting relay services is too big for one or two people, and that it should be segmented by user community and led by members of each user community. This would allow for targeted support and greater specialisation of those responsible for promotion.
24. We consider that promotion of services should remain a key component of the relay service, and that in order to provide maximum benefits to those who need it there is an ongoing role for service providers to promote and demonstrate relay services. This includes targeted outreach activities to raise awareness.

Fixed Devices vs Mobile Devices

25. Technological developments have changed the way we as consumers access communications. For many New Zealanders, fixed line telephones (landlines) are giving way to mobile devices.
26. Although the public consultation document noted that relay service users are increasingly using personal devices to access the relay service, respondents highlighted the importance of choice in accessing relay services over both fixed and mobile devices. This arises both from personal preference and accessibility considerations arising from the nature of a given individual's disability.
27. While we are encouraging responses to the upcoming tender that encompass next-generation technologies, we recognise the importance of retaining users' right to choose between accessing services on fixed line and mobile devices.

'One Stop Shop' for Relay Services

28. We are aware of the confusion caused by relay services being spread across three websites, and different branding for NZ Relay, CapTel and VIS. Respondents indicated that a 'one stop shop' for all relay services would solve this issue.
29. A 'one stop shop' would need to be accessible for all user communities. For example, an app-based solution alone would not suffice as not all members of the user communities are users of smart phones.
30. One interesting comparison raised was the Microsoft Office 365 suite, which offers multiple applications and programmes through a single portal. A portal for relay services could be tailored to meet user configuration requirements in a similar way.

Equal Enablement of Ingoing and Outgoing Calls

31. While all services enable relay users to make calls to other parties, many do not have incoming call functionality. Respondents indicated that this is a key barrier for those with communications disabilities being able to use telecommunications services in the same way as the rest of the population.
32. We agree this issue should be able to be resolved through contracts for services beyond June 2019, and intend to ask prospective bidders to demonstrate how they can make this functionality universal to relay services.

Provision of Headsets for Relay Users with Physical Disabilities

33. We are aware that many members of the user communities, in particular the speech impaired, live with physical disabilities. Respondents submitted that these users should have access to headsets or other assistive equipment to enable them to more easily use relay services.
34. We acknowledge relay service users with physical disabilities currently do not appear to be able to access government assistance specifically for this purpose. Questions remain as to whether this issue is best addressed through the provision of relay services.

Affordability

Calls to Mobiles

35. Under the existing contracts, only calls to national landlines (excluding premium numbers) are provided free of charge to users. Calls to premium, international and mobile numbers are possible, but the user must have registered for a pre-paid calling card, which is charged per call at the user's expense.

36. Respondents submitted that the need to use a calling card is overly cumbersome for relay service users, particularly as more people who relay service users contact are using mobiles in place of landlines. The question remains however as to how this issue could be addressed.
37. Respondents suggested putting this point to prospective bidders to demonstrate how they would address this issue by a given date. It was also suggested that the implementation of a next generation solution, such as voice recognition software, could lead to savings in operational expenditure that could be diverted to covering or subsidising the cost of calling mobiles.

The Costs of Accessing Connectivity

38. Respondents indicated the costs of accessing services over the internet continue to be a barrier to the effective use of relay services for some users, despite recent trends indicating decreasing costs. In addition to having access to a computer or mobile device, users have to have a home broadband connection and sufficient mobile data to utilise the VIS.
39. We are aware that arrangements to zero-rate data are technically feasible and have been implemented in New Zealand, and would welcome proposals from prospective bidders who incorporate zero-rated or reduced data solutions.

Fit for Purpose

40. Much has changed since the relay service began in 2004. Technology has developed significantly, changing the methods we use to communicate with one another – both in terms of the devices we use and how we choose to interact. This raises a number of issues when considering what the relay service will look like beyond June 2019.

Performance Issues with Current Services

41. Several respondents raised performance issues with current services, in particular Mobile Text Relay and CapTel.
42. We acknowledge that end users have experienced these issues but equally acknowledge that they are not always the fault of the service provider. Often poor connectivity, including slow connection speeds, contributes to poor user experience. This closely links to the cost barriers to connectivity outlined above.
43. However, we do think it is important that prospective bidders demonstrate how they would address performance issues, and to this end we intend to include usability specifications in the Request for Proposals.

Discontinuation of Teletypewriters

44. The proposal that teletypewriters (TTYs) are obsolete and should be discontinued in New Zealand was common in many submissions and at public consultation events. As the upcoming tender presents an opportunity to move away from solutions that are increasingly being referred to as legacy technology, we propose to explicitly rule out TTYs as appropriate means of delivering relay services beyond June 2019.
45. Prior to the public consultation, it had been suggested that some individuals may have a reliance on TTYs for their day-to-day affairs, and that it may be preferable to cease issuing them as of 1 July 2019 but continuing support for them into the next round of contracts. Stakeholder groups we consulted with are now confident that TTY service can cease as of 1 July 2019 and that the six month period between the announcement of services beyond that date and their implementation is sufficient to transition any residual TTY users onto a successor service.

Queueing System for Video Interpreting

46. Respondents expressed frustration with the lack of a queueing system on the VIS. With the VIS currently delivered over the Skype platform, users are able to see which interpreters are available at a given time through a green or red dot next to their name. During peak times all interpreters may be unavailable, and one becoming 'green' results in a 'scramble' for those waiting to use the service to put their call through, meaning the first in is not always the first served.
47. Although the issue can be addressed by pre-booking a call during peak times, we consider that modern relay services should have a queueing system that gives those who make contact first priority for calls that are not pre-booked.

Increased Quality Assurance and Video Interpreters

48. Some respondents expressed concern around the quality of video interpreting services, citing examples of when a poor experience with a single interpreter had led to active avoidance of that interpreter for future calls.
49. The Agreement for Video Interpreting Services between the Crown and the service provider contains stringent requirements for video interpreter staffing. This includes minimum qualification requirements and membership of the Sign Language Interpreters' Association of New Zealand (SLIANZ). Comprehensive training is also required to be provided to all new appointees, including upholding the SLIANZ Code of Ethics and the Service Provider's Code of Ethics.
50. One suggestion raised in the course of submissions was the possibility of the implementation of a user satisfaction rating system. This could be implemented as a pop-up box at the end of each call, allowing end users to anonymously score a video interpreter's performance and provide feedback. Feedback could be addressed directly with video interpreters, and ongoing professional development

could address any issues identified, such as training for particularly sensitive calls or specialist areas such as financial or medical matters.

Next Steps

51. We will issue the Request for Proposals for New Zealand Telecommunications Relay Services beyond June 2019 in mid-2018 on the Government Electronic Tenders Service (GETS).
52. We intend to assess the bids received in early September and nominate a preferred supplier, with the intention to reach agreement with a successful supplier in late 2018. This will ensure adequate time to publicise and promote any changes to the provision of service beyond June 2019 ahead of implementation, and to plan for a smooth transition to new arrangements on 1 July 2019 without any disruption of service for end users.

Appendix A: Summary of Respondent Information

Please note that not all submissions answered all questions. For several questions, respondents answered more than once.

Submissions received: 24

Submissions that indicated they were made on behalf of an organisation: 10

Submissions that indicated the respondent was based in a region:

2	Northland	1	Wellington
6	Auckland	-	Tasman
1	Waikato	-	Nelson
1	Bay of Plenty	-	Marlborough
-	Gisborne	-	West Coast
-	Hawke's Bay	3	Canterbury
-	Taranaki	-	Otago
-	Manawatu-Wanganui	1	Southland

Submissions that indicated respondent's age bracket:

-	Under 18	4	45 – 54
-	18 – 24	3	55 – 64
4	25 – 34	-	Over 65
1	35 – 44	1	Prefer not to disclose

Submissions that indicated respondent's communication disability:

15	Deaf
6	Hearing Impaired
5	Speech Impaired
2	Deafblind
5	Other

Submissions that indicated that respondent was hearing recipient of relay calls or VIS user: 5

Submissions that indicated that respondent is a New Zealand Sign Language user: 14

Submissions that indicated frequency of use of relay services:

	Every day	Several times a week	Once a week	1-3 times a month	Less than once a month
Teletypewriter to Voice	-	-	-	2	3
Voice Carry Over	-	1	-	1	2
Hearing Carry Over	-	-	-	-	2
Mobile Text Relay	2	1	-	1	5
Internet Relay	3	2	1	1	3
CapTel	-	2	-	2	1
Web CapTel	-	2	-	-	-
Video Interpreting Service	5	3	-	3	2
Speech to Speech	-	-	-	1	3
Video-Assisted Speech to Speech	-	-	-	-	2

Please note that most submissions indicated that respondents used more than one relay service at varying frequencies.

Submissions that indicated respondent's awareness of relay services:

18	Teletypewriter to Voice	17	CapTel
14	Voice Carry Over	10	Web CapTel
14	Hearing Carry Over	19	Video Interpreting Service
14	Mobile Text Relay	14	Speech to Speech
19	Internet Relay	11	Video-Assisted Speech to Speech