

From: [GDCS Charity](#)
To: [Fergus Reid](#)
Subject: Guernsey Competition and Regulatory Authority: Enquiry
Date: 12 September 2021 18:11:38

Dear Fergus, as promised, please see below the responses of the Guernsey Deaf Children's Society to the questions raised in the consultation. Our members comprise deaf children (up to the time they finish full time education), and their parents, carers and families. Although none of our current members rely on it, one of the particular vulnerabilities of deaf people is where they don't have hearing aids that connect to a mobile phone, and rely on amplification equipment on their landline. In an emergency situation, even if they have access to a mobile phone, they may not be able to hear the operator having dialled 999. We have responded to the consultation as best we can based on knowledge of our membership, and having sought feedback from them on the proposals.

Part 1

Q1. Yes, vulnerable persons should have a free backup solution, and it should be maintained for free. The solution of mobile devices being used necessitates those devices being regularly charged, which some vulnerable groups may find a challenge. This wouldn't be an issue for most of the members of the GDCS as they will have access to mobile devices, and have some level of assisted hearing, and due to their ages will be living with parents or carers.

Q2. We're not sure it's as simple as deciding a single qualification test. Due to their needs, some of our members may rely on amplified landline handsets, which would meet both of the qualification tests.

Q3. Not specifically applicable to our members.

Q4. Each person in the household. Household should be defined by address.

Q5. Not specifically applicable to our members.

Part 2 - not applicable to our members, so no feedback given.

Part 3 -

Q19. not applicable to our members, so no feedback given.

Q20. Yes, this seems only fair.

Q21. not applicable to our members, so no feedback given.

Q22. not applicable to our members, so no feedback given.

Q.23. not applicable to our members, so no feedback given.

Part 4 - not applicable to our members, so no feedback given.

Part 5 -

Q29. Whatever timescale is needed to ensure effective operation - this will be a decision to be made based on expectations of effective life expectancy of the equipment.

Q30. Yes they should be replaced for vulnerable people at the end of their effective life.

Q31. Unknown - ideally a remote testing solution to be run by the network operator.

Q32. For the vulnerable, the duty should rest with the network operator.

Q33. Would suggest those with learning difficulties or severe mobility issues, however this is a personal view, and not that of the GDCS.

Q34. No we don't believe it should be the network operator's responsibility to monitor if someone has become vulnerable.

Q35. The network operator should follow up in the case of a change of address of a vulnerable person.

Q36. 1. Evidence should be obtained from a vulnerable person's doctor or care worker. 2.

Office of utility regulation. 3. No feedback. 4. Written reasons should be provided.

If you have any questions on the particular vulnerabilities of deaf children, please let me know.

Kind regards

Jon
