

The impact of Internet Protocol (IP) Telephony to the elderly (including those Personal Emergency Link service recipients) in Hong Kong

Concern and Recommendations from Senior Citizen Home Safety Association

1. Our Concern

The service provision of Personal Emergency Link(平安鐘) is hooked up with telephony service, which enhance us a good understanding of the needs in telephone service among the elderly and the vulnerable groups in the community as follows:

- For the singly lived elderly and the people with disabilities who are using PE Link service, the basic telephone and connection service must be highly reliable and stable at anytime to ensure emergency saving can be delivered once necessary. Any unexpected service interruption may bring to disastrous outcome.
- Most of the elderly are not knowledgeable to new tele-communication technology. It is difficult for them to distinguish the different service characteristics, usage and limitation offered by different operators.

From Oct 2004 onwards, Office of the Telecommunications Authority invites views on the Regulation of IP Telephony, the Consultation Paper is comprehensive which cover different aspects and issues involved in IP telephony. When the fixed telephone line often serve as the major or even the sole communication tool and connection with community for many elderly, our Association is most concerned of the part on “Consumer and other” among the key Regulatory issues raised out in the Consultation Paper, and would like to express our concerns:

1.1. Access and Connection to Emergency services

When the citizen dials 999 to access for emergency service, the conventional telephone service is capable to provide the agencies operating the emergency service with information of the caller via caller identity display, such information is critical in case the caller cannot identify himself or herself because of some unexpected reasons. According to the paragraph 93-97 of the Consultation Paper, it stated the “IP Telephony” operators may not be able to provide such kind of information of the caller.

SCHSA is worried of such limitation. Although the operator can request the consumer to inform new address after removal to update database record, when IP telephony can be dialed anywhere with the network, the IP address is no way to perform same function as caller identify in Conventional network to locate the exact address of the caller.

1.2. Back-up Power Supply during AC Power Failure

According to the paragraph 98-101 of the Consultation Paper, it stated the IP telephony may not be able to well-functioning during failure of public electricity supply.

SCHSA expresses deepest concern when such period may also be the most risky moment for those elderly seeking for emergency support. The backup power supply pays an important role in un-interrupted service which is required in the licensing to conventional fixed line carrier. Although OFTA has advised the IP Telephony network operators to install backup power supply in Sept 2004, not all the involved buildings with IP phone service provision have been installed up to the moment. As a result, any sudden failure of AC power supply will expose those elderly and people with disabilities in high risk.

1.3. Quality of Service (QoS)

1.3.1. Quality of voice communication:

Unlike conventional telephone service, IP telephony call message is delivered over the internet whereas the signal is transmitted by means of packet and later re-constructing, sometimes “echo” can be heard by the caller which creates additional difficulty to those elderly with listening problem. According to the paragraph 103-109 of the Consultation Paper, it raise out whether the IP phone operators should meet certain minimum service standard. SCHSA realizes it is a must. Meanwhile, the respective body should monitor and regulate the service operators to provide clear and accurate information, as well as organize relevant education for the consumers to enhance analyzing and recognizing the strengths and weaknesses of each technology before making a final decision.

1.3.2. Service monitoring:

According to the paragraph 104, the code of practice has pointed out it is important the consumers are given adequate confirmation for informed choice to be made, including range of service with different functionalities and quality of service. However, the aggressive promotion strategy adopted by the IP telephony operators have aroused many dispute with the customers as reported in recent months. In addition, new dispute between key market players brought from launching Broadband phone over other operator’s network, the incident and argument upon “suspected network signal being filtered” was happened during Sept 04, while the consumer is the victim at the end. More or less it reflects a higher level of supervision and guidelines should be enforced.

1.3.3. After sales service:

When the consumer switches to another network operator, but most of the elderly don’t know how to plug-into the new adaptor after wiring by the technician of new operator and network is connected few days later, which makes the phone unable to function. In addition, delay in DTMF signals or change of power voltage in the process of signal transmission via the network may also lead to the EAS unit connecting with telephone inability to function well.

2. Our Recommendations

In regard to above captioned concerns, SCHSA strongly recommends OFTA to consider the following points in formulating regulation for IP Telephony:

- 2.1. Certain acceptable minimum level of service quality should be attained in licensing, which may include access to emergency services and un-interrupted service during failure of AC power supply, to protect the public interests and avoid confusing to the consumers. High Reliability is critical for telephone service.
- 2.2. Government should strengthen education for the consumers and officially request the operators to provide clear and understandable materials to the consumers, including the elderly and those who are less knowledgeable over new technology, to understand the strengths and limitation of service provided.
- 2.3. OFTA should strictly monitor whether the operators are keeping to their service pledge, and providing accurate information to consumers. Setting up a formal body with legitimate authority to handle complaints can be considered. Once complaint is proved substantial, warning, fine and even discretion over renewal of license could be imposed to the relevant network operator.
- 2.4. Limitation in displaying caller identity may affect the operational process and service delivered by the emergency service agencies. If OFTA accepts the limitation of IP Telephony in the last, the IP phone consumer should be well informed of such limitation to make their best choice.
- 2.5. Cost is the core issue of installing back-up power supply issues, though some minor inter-departmental / liaison work must also be handled to secure for relevant installation space.

Such back-up power supply should be a compulsory requirement in licensing to avoid any tragedy happened once inability to connect for emergency saving because of malfunctioning of the phone during failure in public power supply.

- 2.6. As part of after-sale service as well as committing social responsibilities for the elderly, it is suggested the technician of the new operator can make marking on the new plug, and call the elderly to plug-into the relevant adaptor once network is connected and service is ready for use.
- 2.7. OFTA should also advise the IP phone operator to take up social responsibilities in actively cooperating with the emergency saving agencies. In not affecting their service delivery and system, the IP operator can calibrate the back-end equipment to interface with the personal link emergencies alarm, which can enhance the elderly users in keep enjoying such meaningful and helpful service to ensure their personal safety.

Remarks: more than 1,600 elderly who are using PE Link service has switched to use IP telephony up to Nov 22, 2004, occupying around 5% of our total users (34,000).

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