

Tobii/Smartbox merger inquiry

Comments on initial submission by Tobii AB (publ) for phase 2 review

Submitted by:

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Disclaimer- The statements in this submission are reflective of my own opinions and views and not those of my employer Beaumont College.

- A2. Tobii notes the differentiation between Complex Communication Needs and Complex Access Needs. However, the two are inextricably linked in this market. Suppliers ensure they have a communication solution which can be accessed by switches and many have a solution which can be accessed by eyegaze. Even without these highly complex solutions accommodations for touchscreens are often required. The correct access method is critical to whether the individual can communicate.
- A6.2 There is competition between “dedicated” and “consumer” devices. However increasingly the users who select consumer devices do not require the additional benefits a dedicated device can provide. The downstream market is likely to be split between these two types of device. Were a company to recommend a dedicated device when a consumer device was suitable they would be mis-selling
- A6.3 Reference to Smartbox as a “recent entrant” to the dedicated device market is not entirely accurate. While only recently manufacturing devices, Smartbox have for many years produced devices from off the shelf solutions, but which have all the hallmarks of a dedicated devices (switch access, amplification). They were selling these solutions in the UK long before Tobii entered the AAC market.
- A8.2 Where is the evidence to support this? What percentage of solutions are privately or charity funded? Will these users lose out as they do not have the buying power of the NHS?
- A21&22 From outside Smartbox it is clear that the last few years have provide extensive growth for Smartbox, growing in the last 15 years from primarily employing family members to now having an extensive development and sales team.
- A27 This is all true but further supports my response to A2
- A28 The bolt-on solution referred to has been available for a number of years (it has been used in Beaumont College for assessment purposes). However it is not a viable alternative to s dedicated device and therefore not likely to be significantly competitive.
- A39 The development path outlined here is agreed. However it again serves to support the point that the access method cannot be separated from the communication tool. Therefore a narrowing of the market and therefore the number of available eye-gaze systems will be of detriment to AAC users who may find the only eyegaze camera they could use is now no longer available.
- A62 There are some inaccuracies here: Essence is not comparable to Grid 3 and Communicator; Unity from PRC may be compared but it is highly specialised and would be considered for

specific users. Clicker 7 is not comparable, it is literacy support software and not designed for communication.

- A64 Tobii gave no indication prior to the merger that they would discontinue Communicator 5. The only (commonly used in the UK) competing alternatives to Grid 3 and Communicator is Mind Express from Jabbla.
- A81 The AMDi iAdapter is not a dedicated device, it is an iPad case.
- A84 See comment on A6.3 regarding “wrapped” solutions and the maturity of Smartbox’s AAC business
- A89 I disagree with this. Smartbox is the only developer of AAC software of this type in the UK. If as a result of this merger that development moves out of the UK, the UK user will be directly affected and will have less input into future development.
- A102 One of Smartbox’s major attraction as a company was that it provided several different eyegaze cameras (including Tobii’s until that was removed). Switching to only providing one would cut down consumer choice as there is not guarantee that other AAC companies would start selling alternatives.