

## **RNIB response to the Ofcom report "A new approach to public service content in the digital age".**

**23 March 2007, submitted by Leen Petré**

RNIB welcomes the opportunity to submit comments to this report.

1.1 The Royal National Institute of the Blind (RNIB) is the leading organisation representing the needs and interests of the two million people in the UK with a sight problem. We work directly and indirectly with blind and partially sighted people, representative organisations, visual impairment professionals, national and local government, the broadcasting and entertainment sector, and a range of public and private organisations.

1.2. The majority of blind and partially sighted people are over the age of 65. Sight loss (along with hearing loss and certain other disabilities) is for many people related to ageing. As forecasting indicates that older people will be in the majority by the year 2025, inevitably the number of blind and partially sighted people will increase. It is therefore crucial to ensure that current broadcasting regulation provides a solid basis for future access and services for blind and partially sighted people.

1.3. Since its Needs Survey\*\* in 1991 showed that 94% of blind and partially sighted people watch television, RNIB has taken an active role in highlighting TV access issues. It has worked to try to ensure access to programmes, services and equipment, both by direct work with broadcasters and manufacturers and by influencing legislation.

1.4. RNIB has found that the broadcast media play an important role in the lives of blind and partially sighted people by providing access to news, information and entertainment. Independent television viewing is facilitated by the provision of audio description, an additional narration that uses the gaps in the dialogue to provide essential information about scenery, action, costumes and other visual information to allow blind and partially sighted people to follow what is happening on screen. It takes away the dependence of relying on someone else to fill in the key gaps (or missing the end of a story because there is no-one to ask). As the service is only available on digital television, an increase in the provision of audio description would be an important incentive to make blind and partially sighted people switch from analogue to digital television.

2. RNIB would like to re-iterate the following issues that we have submitted to Ofcom in response to previous PSB consultations:

2.1. We welcome the suggestion that PSBs need to contribute to a tolerant and inclusive society and that it needs to reflect the lives of other people and other communities.

2.2. On the basis of the Public Service Principle that content should be widely available, we would like the Public Service Publisher proposals to firmly ensure that disabled people have access to programme content funded by the PSP. So far we have not seen those principles reflected in any of the Ofcom documents about the PSP, and we need to see these principles embedded in the PSP proposal from the start.

Firstly, this means that content that is delivered under the PSP should be made accessible to blind and partially sighted people with the access service audio description. This has to be a condition for any provider receiving PSP funding, irrespective of whether their content is delivered over traditional TV or over broadband: the basic principle has to be that content will be made accessible to blind and partially sighted people with audio description irrespective of what platform it is delivered on.

Secondly, it means that that responsibility finding technical solutions for making the navigation of PSP content possible for people who can not use on-screen menu's rests with the PSP provider(s). In this context, accessibility of EPGs and other navigational systems for blind and partially sighted people should be covered by the PSP remit. This means that the navigation that viewers use to access content, when this content is delivered over a PC, should be designed in such a way that it works with PC access technology such as screen readers. In other instances, it means that the PSB provider will have to find innovative access solutions to secure voice output of navigational menu's to ensure that people who can not rely on vision can use the platform that the content is offered on.

RNIB looks forward to seeing these issues taken into account when the final shape and funding of the PSP are decided and urges Ofcom to ensure that they are part of the conditions for the tendering process for those who wish to apply for PSB funding.

Please feel free to circulate this consultation response and publish it on your website.

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