

## Cover sheet for response to an Ofcom consultation

### BASIC DETAILS

**Consultation title:** Radio - preparing for the future

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Name/contact details/  
job title

Whole response

Organisation

Part of the response  
annex, which parts?

If there is no separate

If you want part of your response, your name or your organisation to be confidential, can Ofcom still publish a reference to the contents of your response (including, for any confidential parts, a general summary that does not disclose the specific information or enable you to be identified)?

Yes

No

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Name  
copy)

Jill Whitehead

Signed (if hard

# **RNIB Response to Ofcom's "Radio - preparing for the future" Consultaion**

## **Introduction**

RNIB is the largest organisation of blind and partially sighted people in the UK. Our Broadcasting and Talking Images team work with the broadcast industries to ensure television and radio are accessible to people with sight problems.

Whilst we welcome the opportunity to comment on this consultation, we find it very disappointing that it does not address accessibility at all, and we see this as the single most important issue facing blind and partially sighted people when it comes to enjoying radio. People with sight problem have always enjoyed, and fully participated in, radio. With the growth of DAB digital radio – especially radio electronic programme guides (EPGs) – blind and partially sighted people face being completely excluded from a medium they have always had full access to. RNIB sees Ofcom's role as regulator as crucial to making sure radio is kept accessible.

Not only should equipment and EPGs be accessible, but it is vital that programme-makers are reminded that radio is primarily for people to listen to. Therefore it is inappropriate to run competitions, for example, that require the audience to refer to the screen on their radio or the webcam without offering alternatives that are accessible to blind and partially sighted people. We would expect Ofcom to draw up guidelines on keeping radio accessible to blind and partially sighted people and will happily assist Ofcom in the writing of such guidelines.

## **Regulating local commercial radio**

1. Do you agree that our main method of regulating radio stations should be the programme formats set out in their licenses?

No, in addition to programme formats other elements have to be taken into account. Radio stations should commit to stated undertakings regarding their involvement with the communities they serve. For example, a stated proportion of their advertising should be devoted to local enterprises and

events; a stated proportion of it's news should be local; each station should have to employ a stated proportion of local people.

2. How can we make sure that listeners get a high standard of local and national news?

Should we allow news hubs? Should stations have to provide full-time, professional journalists, based in their local area, during all local programming hours? Is there a better way of protecting the quality of news, that focuses on the actual programmes, rather than how they're made?

Listeners' panels should be set up to monitor a station's output in general, and news output in particular. The make-up of these panels should reflect the diversity of the community the station serves, and must include at least one person with a sight problem. Ofcom should set up it's own listeners' panel which would monitor the output of commercial and community stations across the country and this panel should also include representatives of blind and partially sighted people. RNIB is best placed to advise Ofcom on finding suitable panel members.

3. Should stations decide for themselves how much automation they use?

Yes, as long as stations are closely monitored by listeners' panels to ensure automation does not reduce the quality of the output. An example of where automation produces reduced quality output is when time checks are not removed, resulting in the wrong time being broadcast. This is very confusing for everyone, but especially for more vulnerable groups like elderly people, many of whom have sight problems and rely on their radio for accuracy.

4. Should we relax the rule about a station's studios being based within the measured coverage area, and allow the "licensed area" instead?

No. It is important that studios are based at the very heart of the coverage area to maximise the opportunities for groups such as people with sight problems to be involved. Blind and partially sighted people tend to live in towns and cities because they have to rely on public transport to get around. If studios were based outside the main coverage area there is the risk that these people would be prevented from attending events, visiting the studio to collect prizes etc purely by geographic location.

5. Do you agree that, outside local programming hours, a station should be free to share network material as it likes?

Blind and partially sighted people and elderly people rely heavily on local radio for detailed specific travel information, event information, weather forecasts etc.. As networked material does not fulfil this information function, the amount of networked material broadcast on local radio should be minimal. It is also important that stations flag up which programmes are networked and which are not to avoid any confusion amongst listeners, especially those, like blind and partially sighted people, who rely on the radio for detailed local information.

6. Should stations have to publish a file, both at their premises and on their website, to show how they're meeting their responsibilities?

Yes, and RNIB can advise on web accessibility so that this file is fully accessible to blind and partially sighted people. The file must also be available in other reading formats such as audio and Braille.

7. Do you agree with our revised local guidelines that tell stations what to take into account when making local programming?

Local stations should offer blind and partially sighted people access to essential local information, it should offer them the opportunity to participate in events, employment and placement opportunities. All the information put in the public domain by local stations should be available in accessible formats.

## **Helping digital radio to grow**

8. Do you agree with our plans to release more frequencies in VHF Band III, which are suitable for DAB, in the following way?

Three blocks to provide local digital radio services to areas that don't already have them, and for some areas that already do.

One or two blocks for national coverage (depending on whether a total number of four or five blocks of spectrum are available).

RNIB would like to see more stations serving communities of interest represented on DAB digital radio, so any extra spectrum should be reserved for this purpose, rather than for national stations. Again this would benefit blind and partially sighted people because the radio is often their only access to local information.

9. Do you agree that the proposed local DAB digital radio spectrum as Broadcasting Act licenses?

10. Should the frequency blocks we propose to release for national coverage be awarded without the need for a Broadcasting Act license?

DAB digital radio should be subject to the same scrutiny as other stations, even more so because accessibility issues need to be monitored closely to ensure that blind and partially sighted people retain full access to programmes.

11. How much demand do you think there will be for national spectrum that's designed for DAB?

There will of course be a high demand for national DAB coverage, but equally there will be a high demand for local representation on DAB too. As stated above, it is even more important that local stations and stations representing communities of interest are given the chance of a presence on DAB, not just the big national stations.

12. Should we raise the limit on the amount of data on DAB digital radio capacity, from the current 20%? If so, what should the limit be raised to? And what do you think the extra capacity would be used for?

For thousands of blind and partially sighted people the radio is the key medium for delivering entertainment, news and information. Anything that increases the amount of information on the screen and decreases the amount of voice is to be discouraged because the screen is not accessible to blind and partially sighted people.

13. Should we raise the limit on data that's not linked to programmes (including radio), and which is carried on digital terrestrial television, from the current limit of 10%? If so, what should the limit be raised to?

If more radio stations were enabled to have a presence on DTT than is currently the case, then this would benefit blind and partially sighted people who listen to the radio via their DTT set top box.

14. Do you agree we should abolish the minimum technical standard for DAB digital radio and replace it with a system that measures the quality of sound coming out of the radio?

Minimum standards should be set to measure the quality of the sound coming out of the radio, then Ofcom can monitor performance of units against these standards. In addition, minimum technical accessibility standards for DAB equipment should be set and monitored.

## **Future licenses**

15. How should we divide new MW frequencies between commercial and community radio?

RNIB would support the expansion of community radio on MW, leaving commercial stations free to use VHF. The better sound quality on VHF lends itself to music stations, whereas the quality on MW is not sufficient for music programmes but lends itself to speech output. The more community radio there is available, the more likely it is that blind and partially sighted people will feel involved in their local communities. Also community radio presents more opportunities for people with sight problems, who do not have access to local newspapers, to learn about services and events in their community.

## **Our overall strategy for radio**

17. Do you agree with our basic aims for regulating radio?
- To encourage more choice, variety and new ideas for consumers in the UK – nationally, regionally, locally and in small communities.

Yes, provided there are safeguards against a large number of stations being owned by only a few big corporations and that mechanisms are in place to ensure these commercial stations remain accountable to and seek input from their listeners, including those with sight problems.

- To look after the interests of all citizens through radio that is designed for the public good.

This is vital to protect blind and partially sighted listeners from being excluded by inaccessible features, such as EPGs and equipment. EPGs should not just provide information on screen, but should also have the capacity to provide voice feedback. In addition, DAB equipment should also provide voice feedback of basic information such as station names and of more advanced features such as programming and recording options.

- To achieve our aims with as little interference in the market as possible, and in a way that's as consistent as possible across all media and platforms.

It will be necessary for Ofcom to “interfere” positively to protect the interests of vulnerable groups, including blind and partially sighted people, especially as these groups are not always catered for by market forces. With the diversification of radio across a multitude of current and “in development” platforms (such as DAB, internet and DRM) many people without a computer will be at a distinct disadvantage and Ofcom will need to champion their cause, with the help of organisations like RNIB.

- How important is it that radio should have a set of “public purposes”, and what should they be? Can we take a lead from the public purposes already developed for television. What else should be added, or taken away? Which public purposes are more important than others?

Radio should exist, not only to provide a dividend to shareholders, but to inform, educate and entertain the full range of their listeners, including blind and partially sighted listeners. It is not necessary for each and every station to provide all three, but it is important that all three elements are accessible to the listener in each locality.

- Is radio better at some things than other media?

Yes. Radio is better at providing low budget, high quality programming which includes audience participation, and which can be aimed at very particular, special interest (including communities and groups) audiences. It is much easier for ordinary people to get involved in local radio than it is for them to become involved in television. Also television has many more hang-ups about image and appearance, so making it more difficult for some people to get onto the TV screen; this is not so with radio.

18. What do you think is the best way to deliver these public purposes?

- How important is it for there to be more than one broadcaster providing radio services that have public purposes?

It is important that there is sufficient competition to ensure diversity of programming.

- How much of what commercial radio does could be described as meeting public purposes?

At the moment, very little because the main purpose of many stations appears to be to generate cashflow by the provision of the most popular programming for the largest audience, rather than addressing the diverse needs of a multitude of interest groups within the community.

- How well does the current structure of radio help meet public purposes?

Not very well because there is too little diversity within the provision of programming, therefore wherever you go in the UK you will hear very similar programming and very little reflection of local character and events.

- Should commercial stations have access to the BBC's radio archive, so that they can provide more varied services?

No. It should be expected that commercial stations produce their own special interest programmes, rather than having to repeat programmes which have already been aired on the BBC.

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