

Representing: Organisation (Action On Hearing Loss)

Question 1: Do you agree with Ofcom's proposed changes to the way we collect data, and do you have any further comments?

We support the stated aims of these proposals, outlined in section 1.6.

We strongly agree with Ofcom's proposal to make data submission compulsory (3.15) with a financial penalty for noncompliance. We agree with the assessment made by Ofcom (3.16) that a survey which is voluntary risks enabling some ODPS providers to avoid data provision, resulting in skewed data and reducing the impetus for progressive improvement in access service provision.

From our experience working with ODPS providers, and from our analysis of ODPS versus linear access services, we understand that compulsion by Ofcom is the primary motivator for industry progress with regard to providing subtitles, audio description, and sign language services.

We therefore welcome the proposed changes to the way in which Ofcom collect data.

Question 2: Do you agree with Ofcom's proposed changes to the type of data we collect, and do you have further comments?

We agree with the proposed changes above. Ofcom is right to acknowledge the frustration and confusion amongst consumers when faced with discrepancies in access services across broadcast and ODPS services. In recognition of this, we welcome pragmatic steps that can be taken to facilitate consumer choice, such as providing comparative information on service provision.

We support the breakdown of data by branded services and recognise the value of empowering consumers to make informed choices. However, we hope to see a legislative requirement for a proportional quota of access services in the future, ensuring parity between the provision of on-demand and linear broadcast access services.

We also welcome Ofcom's recognition of the centrality of their role in motivating ODPS providers to deliver access services. We know that without the will of the regulator, the 'significant gaps' (1.3) that currently exist between broadcast and on-demand access services will remain.

Question 3: Do you agree with Ofcom's proposed changes to the way we publish data, and do you have further comments?

We welcome Ofcom's proposal to publish collected data on a biannual basis in a manner that reflects publication of data from linear broadcast television services.

In order for consumers to engage with the data collected by Ofcom, it is imperative that the information pertaining to service providers is itself accessible. We urge Ofcom to develop effective ways in which to promote this information in an accessible way, and to consider provision of

information at point of sale for subscription TV packages, or through a consumer facing report disseminated to people who benefit from access services.

With reference to Ofcom's stated intention to explore new ways in which to report to consumers on ODPS accessibility (4.5), we extend our offer of support. We welcome any future opportunity to meet and discuss ways in which such reports can be made accessible in a meaningful way to people with hearing loss.