



Access and Inclusion

Digital communications for all

Statement

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Section 1

One page overview

Ofcom's duties mean that we have a significant role to play in ensuring that all citizens, irrespective of their age, income, location, education or disability can access and use digital communications services. We refer to our work in this area as 'Access and Inclusion'. In some cases we have been given specific powers and duties and in others the Government has taken the lead and we have provided advice and support.

In our consultation of March 2009, we indicated three core Access and Inclusion issues which we considered to be a priority in our work: the availability of key communications services, the take-up of these services and their effective use. Within these categories we identified our highest priorities, with broadband services as an area of particular focus.

We have made significant progress with these priorities since our consultation. We have taken forward our work on **Broadband Take-up and Digital Participation**. Ofcom was asked by Government to lead a Consortium to develop and deliver a Social Marketing Programme and Targeted Outreach as part of a National Plan for Digital Participation. The Consortium will be launched formally on 15 October.

Upon request from Ministers we have provided technical support to help the Government towards its goal of a **2Mbit/s universal service commitment** for broadband.

We are conducting a range of initiatives to improve **services for disabled users**. We are currently looking at the future of TV Access Services. We have also published an independent study on the potential benefits of improved relay services to facilitate access to telephone services for hearing impaired users. On **Media Literacy** we have launched guides for parents and carers on protecting children in a digital world and together with Mencap, 'Switch On!' a resource for practitioners working with people with learning difficulties and disabilities.

We are reviewing the implementation of the existing **Universal Service Obligation** for fixed telephony to ensure that it continues to deliver the greatest possible benefits in changing market conditions. We expect to publish our initial thoughts before the end of the year.

Emergency (999/112) mobile roaming has been launched in the UK. This is the result of a collaborative effort between us, the mobile operators, the fixed operators who handle the incoming calls and the emergency authorities. Mobile phones will now automatically switch to an alternative network for an emergency call if the user is outside of their own service provider's coverage area.

We are commencing research to examine the causes of **mobile not-spots**, as announced in our Mobile Sector Assessment.

Overall, stakeholders were highly supportive of our approach to Access and Inclusion in their responses to our consultation. Many provided valuable comments on specific areas of our work, which we have considered and discuss further in this statement.

This statement provides a progress update and summary of our next steps on Access and Inclusion. We will provide future updates through our annual Consumer Experience Reports and we invite stakeholders to contribute to setting priorities for our future Access and Inclusion work through our annual planning process. Our next Consumer Experience Report and Draft Annual Plan will both be published in December.

Section 2

Executive summary

Access and Inclusion is among our highest priorities in fulfilling our statutory duties

- 2.1 Digital communications services, such as broadband, mobile phones and digital TV are playing an increasing role in the way many of us stay in touch, work, learn, play, shop and access public services.
- 2.2 The cost of providing communications networks typically means that some gaps in geographic reach are inevitable where deployment is left solely to market forces. Barriers to take-up and effective use of services (such as cost, affordability, or a lack of skills or usable service/equipment) also mean that some citizens and consumers risk exclusion from the benefits that these services offer.
- 2.3 Access and Inclusion - ensuring that all citizens, irrespective of their age, income, location, education or disability can access and use digital communications services - is therefore one of our highest priority areas in fulfilling our duty of furthering the interests of citizens in relation to communications matters.¹
- 2.4 In March this year, we published our consultation, Access and Inclusion – Digital Communications for all (the ‘Consultation’) which sought views on Ofcom’s Access and Inclusion work.²

Stakeholders were broadly supportive of our approach

- 2.5 We received feedback from 40 stakeholders,³ who were largely in agreement with and supportive of our approach to Access and Inclusion and the priority areas highlighted.
- 2.6 The majority of comments we received related to specific aspects of our ongoing Access and Inclusion work. We see this as a signal from stakeholders to focus our attention in this statement on the progress we have made since the Consultation and on how we have taken their feedback into account.

We have a broad range of duties regarding Access and Inclusion

- 2.7 The Communications Act 2003 (‘the Act’) gives us the general duty to further the interest of citizens and consumers in relation to communications services. In carrying out this duty we are required to secure the availability of a wide range of electronic communications, television and radio services throughout the UK.⁴
- 2.8 When carrying out our duties, we are also required to have regard to the needs of the elderly, those with disabilities and those on low incomes.⁵ We have powers to

¹ See Ofcom’s Annual Plan 2008/9.

(http://www.ofcom.org.uk/about/accoun/reports_plans/annual_plan0809/statement/annplan0809.pdf) and draft Annual Plan 2009/10 (<http://www.ofcom.org.uk/consult/condocs/draftap0910/summary/>)

² <http://www.ofcom.org.uk/consult/condocs/access/access/>

³ <http://www.ofcom.org.uk/consult/condocs/access/responses/>

⁴ Section 3(2) of the Act

⁵ Section 3(4) of the Act

implement universal service obligations in order to secure the interests of users. We also have the duty to draw up codes of practice to safeguard and promote the understanding and enjoyment of television programmes for users with a hearing or sight disability through the use of subtitling and audio description.

- 2.9 Where we do not have specific powers associated with our duties under the Act, we are working closely with stakeholders to make a contribution. We are, for example, fulfilling our duty to promote media literacy by contributing research and expertise to initiatives carried out by government, industry and the voluntary sector.

We take care to apply our powers and resources in the most effective way

- 2.10 Our statutory duties give us a broad range of Access and Inclusion issues to consider and we are keenly aware of the challenge this poses. We need to balance the benefits and costs of our regulatory actions, and to be clear about our role and the role of public policy. We aim to use our resources carefully and work with other organisations where appropriate to achieve the greatest possible citizen and consumer benefit.

- 2.11 When considering Access and Inclusion initiatives we use the following framework to identify priorities:

- We assess whether there are significant gaps in the geographic availability of these services and whether there are issues preventing widespread take-up or creating significant impediments to effective use.
- We consider which services matter most from an Access and Inclusion perspective, based on how they help facilitate participation over and above other communications services.
- We also consider whether a majority of the population at large use the service to participate in society, to inform whether those without access are at risk of exclusion.

- 2.12 Based on these criteria, we proposed the following priority areas for current our Access and Inclusion work in our Consultation:

1. Broadband take-up and Digital Participation;
2. Broadband availability;⁶
3. Services for disabled people;
4. The existing Universal Service Obligation (USO);
5. Media Literacy; and
6. Emergency mobile roaming.

- 2.13 Some of these priorities, such as broadband availability and take-up relate to major public policy debates and involve broad programmes of action across multiple stakeholders including us.

⁶ In our Consultation we had grouped 'Broadband availability' and 'Broadband take-up' under one heading, however, given the significance of our work in both areas we now discuss both separately.

- 2.14 Others, such as emergency (999/112) mobile roaming constitute smaller, discrete projects but nevertheless deliver significant benefits for consumers. We identified emergency mobile roaming as a high priority, given that it is a safety of life issue.
- 2.15 In addition to our priorities proposed in the Consultation we see mobile coverage and digital radio as two areas which are likely to increase in importance in the near future.
- 2.16 We looked at the challenges of persistent mobile not-spots and mobile network quality as part of our Mobile Sector Assessment⁷ in July and are now commencing further work in this area.
- 2.17 The Government singled out the transition of radio services to digital by 2015 in its Digital Britain White Paper.⁸

Jointly with our stakeholders we have made significant progress in our priority areas

- 2.18 Six months have passed since we published the Consultation and we have made significant progress in our Access and Inclusion work, particularly in emergency mobile roaming and broadband take-up.
- 2.19 We are particularly pleased to announce that emergency (999/112) mobile roaming is now available in the UK. Following a successful trial, the service was launched nationally on 14 October 2009.
- 2.20 The Government's Digital Britain White Paper⁹ has now been published setting out its priorities for Digital Communications services in more detail and giving us the specific task of leading a Consortium for the promotion of Digital Participation.
- 2.21 We set out below recent progress on our priority areas together with the further work we are undertaking.

1. Broadband take-up and Digital Participation: we are leading a Consortium for the promotion of Digital Participation

- 2.22 The majority of individuals and businesses in the UK now have broadband internet access, but a significant minority of households remain without the internet at home (about 27 per cent of the adult population in the UK or approximately 13m people aged 15+).¹⁰ We commissioned in-depth research aimed precisely at securing a better understanding of the causes of non-participation in the market for broadband, and the possible drivers for change.¹¹
- 2.23 It showed that almost two in ten adults who do not currently have the internet at home intended to get it within the next six months. However, 42 per cent said that their main reason for not having the internet at home was lack of interest or need, the remainder stated financial or resource reasons.

⁷ The consultation is available at <http://www.ofcom.org.uk/consult/condocs/msa/>

⁸ Digital Britain – Final Report, June 2009, Chapter 3b – Radio: Going Digital, <http://www.culture.gov.uk/images/publications/digitalbritain-finalreport-jun09.pdf>

⁹ http://www.culture.gov.uk/what_we_do/broadcasting/6216.aspx

¹⁰ Results from Ofcom Communications Tracking Survey, Q2 2009 and 2001 Census.

¹¹ This research was published on 10 June 2009 and can be found here:

<http://www.ofcom.org.uk/research/telecoms/reports/bbresearch/bbathome.pdf>

- 2.24 We have widely shared our research within the UK and with our international counterparts. It is also informing our work on Digital Participation, described below.
- 2.25 On 29 January 2009, the Digital Britain Interim Report asked Ofcom to form a Media Literacy Working Group, consisting of a range of stakeholders, to recommend a new definition for media literacy and ambition for a National Media Literacy Plan.¹² The outcome of this group was the 'Report of the Digital Britain Media Literacy Working Group'¹³ which recommended a strategic and co-ordinated approach to promoting Digital Participation, i.e. the take-up, use and understanding of digital technology. In particular the Group recommended the formation of a Consortium to drive a Social Marketing Programme and Targeted Outreach.
- 2.26 These proposals were endorsed by the Government in its Digital Britain White Paper which tasked Ofcom with the role of establishing and leading the Consortium.¹⁴ Over 50 organisations including the BBC, BSkyB, BT, Channel 4, Google, Microsoft, the Mobile Broadband Group and Research in Motion (Blackberry) have agreed in principle to become members of the Consortium. The Consortium will work closely with other initiatives in this area such as the work of Martha Lane Fox - the Champion for Digital Inclusion, the Digital Inclusion Task Force, the Digital Life Skills review, UK Council for Child Internet Safety (UKCCIS) and Get Safe Online.
- 2.27 The Consortium will be formally launched on 15 October 2009. Its next meeting following launch will take place on 1 December 2009.

2. Broadband availability: we are working with Government to ensure that broadband becomes available as far as possible across the UK

- 2.28 Obviously citizens cannot take up broadband services unless they are available in their areas. Ofcom does not currently have powers in this area in relation to broadband services. The Government has, however, highlighted the importance it attributes to broadband availability by proposing a Universal Service Broadband Commitment in its Digital Britain White Paper.
- 2.29 Given our duties, we also consider broadband availability and take-up of paramount importance to citizens and consumers given the benefits they might otherwise miss out on.
- 2.30 Stakeholders widely agreed with the importance of broadband on our Access and Inclusion agenda. However, some voiced concerns that the Government's 2Mbit/s universal broadband target may not be sufficiently ambitious, and stressed the importance of keeping universal service targets up to date. It is worth noting that the 2Mbit/s target has been set for 2012, and the Government has made it clear that this target will evolve.
- 2.31 Ministers asked Ofcom to provide technical support and advice in relation to the 2Mbit/s target, which we have done. We also have committed to work with the Government to provide technical advice on its 'Final Third' initiative for widespread availability of super-fast broadband following Parliamentary approval.
- 2.32 The vast majority of current generation broadband infrastructure, however, is delivered by the market. In addition, major broadband players such as Virgin Media

¹² Digital Britain – The Interim Report, Page 69

¹³ http://www.ofcom.org.uk/advice/media_literacy/media_lit_digital_britain/

¹⁴ http://www.culture.gov.uk/images/publications/chpt2_digitalbritain-finalreport-jun09.pdf

and BT are introducing super-fast broadband. We have an important role in providing the regulatory certainty that these businesses need to make investment decisions, and in ensuring that consumers continue to benefit from innovation and choice delivered through competition. Our work in this area, e.g. our upcoming wholesale broadband access market review and our statement on 'Super-fast broadband' earlier this year,¹⁵ do not fall under the Access and Inclusion umbrella, but still make an important contribution to securing the availability and affordability of services.

3. Services for disabled users: we are reviewing the television access services and the text relay service available under the USO, to ensure they fulfil their purpose in a changing market

2.33 The Act requires us to have regards to the needs of disabled users. We take this very seriously and are committed to ensuring disabled people can access communications services, as far as possible, on an equivalent basis to others.

2.34 Our specific duties regarding the services for disabled people are:

- to ensure access to television, teletext services and electronic programming guides for users with visual and hearing impairments; and
- to take measures to ensure that disabled users enjoy equivalent access to publicly available telephone services, in particular through the provision of relay services as part of the USO.

TV Access Services

2.35 Ofcom ensures that broadcasters provide minimum proportions of programmes with subtitling, sign language and audio description¹⁶ to enable people with sensory impairments to experience an enhanced television experience through the 'Television Access Services Code'.

2.36 In September, we published a consultation reviewing this code.¹⁷ In that consultation, we indicate our view that the Television Access Code continue to strike a reasonable balance between benefits to users and the financial burden on television channels.

2.37 A number of stakeholders have alerted us to the need to consider the future of TV Access Services at a time when access to broadcast content via the internet and on-demand programming is becoming more widespread.

2.38 Ofcom recognises that on-demand access to content is becoming increasingly popular. However, these services cannot be considered as part of the current TV Access Services review as the Act does not provide Ofcom with any powers to require Video on Demand (VOD) providers to supply access services.

2.39 However, the European Parliament's Audio Media Services Directive which comes into force at the end of 2009 extends broadcasting regulation to cover VOD, and includes a requirement for Member States to:

¹⁵ http://www.ofcom.org.uk/consult/condocs/nga_future_broadband/statement/

¹⁶ Audio Description is an additional narration on TV programmes that describes on-screen action, body language and facial expressions between programme dialogue. Specifically produced for each programme, it allows people who have difficulties seeing the TV to hear what they can't see.

¹⁷ http://www.ofcom.org.uk/consult/condocs/access_services/; the consultation is open until 12 November 2009.

“[E]ncourage media service providers under their jurisdiction to ensure that their services are gradually made accessible to people with a visual or hearing difficulty.”¹⁸

- 2.40 The Department of Culture Media and Sport has asked Ofcom to take this forward and over the next few months we will be discussing with VOD providers what plans they have in this area.¹⁹
- 2.41 Our consultations on Television Access Services and VOD are open until 12 November and 26 October 2009 respectively.

Review of the text relay service

- 2.42 Text relay is a service used by deaf, hard of hearing and speech impaired people (referred to here for brevity as ‘hearing impaired’) to make telephone calls. It involves a relay assistant in a call centre, typing what the hearing person says and voicing what the hearing impaired person types. BT currently provides the text relay service in the UK as part of its universal service obligations.
- 2.43 Stakeholders highlighted to us that they felt that a review of the text relay service was important but not sufficient. Many stressed that with the growing importance of the internet, access to and usability of online services was of increasing importance.
- 2.44 As part of our review of the USO, Ofcom is considering the scope for improving the existing relay service, in light of technological developments. We are looking at whether text relay should evolve substantially to provide enhanced services such as captioned telephony.²⁰
- 2.45 In July 2009, we published an independent report by Plum Consulting²¹ which suggested there is consumer demand for additional relay services and that these would be likely to help deliver greater efficiency for hearing or speech impaired people at workplaces and also greater social inclusion. This is a valuable input to our understanding of the social value that may be attached to text relay services.
- 2.46 We are continuing work on services for disabled users in all areas of communication. For example we have commissioned research to explore how people with a mobility or dexterity impairment use communications services and what barriers they experience. We are also working with the Customer Contact Association (a trade association for call centres) to produce and promote guidance for call centre staff interaction with disabled people. We will provide a progress update on this further work in our Consumer Experience report in December.

¹⁸ Article 3c of Directive 2007/65/EC of the European Parliament and of the Council.

¹⁹ We published a consultation on Proposals for the regulation of video on demand services on 14 September 2009. The consultation will be open until 26 October 2009.
<http://www.ofcom.org.uk/consult/condocs/vod/vod.pdf>

²⁰ Captioned telephony allows the user to both listen to what the other party is saying and near simultaneously read captions of what is being said and Video relay allows communication over video phones using a remotely based British Sign Language interpreter.

²¹ http://www.ofcom.org.uk/research/telecoms/reports/voice_telep/

4. The existing USO: We are reviewing the benefits and costs of the existing implementation of the USO

- 2.47 The scope of universal service is defined by the European Commission's Universal Service Directive.²² It is then the duty of the Secretary of State in the UK Government to set out the general requirements which must be provided as Universal Services in the UK. These requirements were most recently set in 2003.²³
- 2.48 Currently at least one designated provider must meet all reasonable requests for access to a fixed line, and fulfil provisions with regards to directories and directory enquiry services, public pay phones, social tariffs, billing and payment options and services for disabled users. It is our responsibility to implement the requirements set by Government, and to ensure they are met. We do this through specific conditions (the USO) on BT and Kingston Communications, whom we have designated as the universal service providers.
- 2.49 Broadband services are not currently included in the scope of USO under either the Universal Service Directive or the UK's Universal Service Order. In the event that this changes, we will take the necessary steps to ensure that they are implemented, in line with our responsibilities under the Act.
- 2.50 We will shortly issue a consultation on a review of the implementation of the USO, which will set out a proposed framework for the review. In doing so, we will assess the fitness for purpose of the obligations, taking into account the level of burden the existing obligation places on the current USO providers and the value the USO provides to society as a whole. We also intend to consider potential funding and procurement of any financing scheme if we find that there is now an unfair burden on the USO providers in delivering the USO.

5. Media Literacy: We are working with stakeholders to promote better understanding of communications services

- 2.51 Our duty to promote media literacy (section 11 of the Act) requires us to bring about a better public understanding of the nature of content, how it is selected and made available and how it can be controlled and regulated. Under section 14(6)(a) of the Act we have a duty to make arrangements for the carrying out of research into the matters mentioned in section 11(1).
- 2.52 Our work in this area includes informing and empowering people to manage their own media activity, by promoting technical tools strategies and information about content. We do this in close co-operation with stakeholders from government, industry and the third sector.
- 2.53 Jointly with our partners Mencap, we developed a Media Literacy education resource (Switch On!) for practitioners working with people with learning difficulties and disabilities. We are delighted that the National Open College Network (NOCN) Media Literacy Entry level qualifications, developed in partnership with NOCN, and that Switch On! supports, have been approved and were made available in August. This is the first media literacy qualification for people with learning difficulties and disabilities.

²² The text of the Universal Service Directive can be found here: <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:32002L0022:EN:NOT>

²³ The text of the Government's Universal Service Order can be found here: <http://www.opsi.gov.uk/si/si2003/20031904.htm>

2.54 In September we published a report on “Children’s and young people’s access to online content on mobile devices, games consoles and portable media players”. In October we published interim reports about UK children’s and adults’ media literacy. We have also produced guides for parents and carers on protecting children in a digital world.²⁴

6. Emergency mobile roaming: Emergency mobile roaming is now available

2.55 Emergency mobile roaming provides citizens with the ability to make emergency calls wherever there is a mobile network available in the UK, irrespective of whether the person in need of help has signed up with that specific network.

2.56 We are pleased to announce that this service is now available to citizens in the UK.

2.57 The successful launch of emergency mobile roaming is the result of a joint effort of the mobile network operators, emergency authorities and the fixed operators who act as call handling agents and Ofcom.²⁵

2.58 A further extension to the accessibility of the emergency services has been initiated by the ‘999 Liaison Committee’²⁶ and is being trialled. Emergency access through text messaging (SMS) is intended for users with hearing or speech impairments who would find it difficult to make a conventional call. Users who wish to access the service are required to pre-register here: <http://emergencysms.org.uk/>.

Emerging priorities: Mobile not-spots and digital radio

Mobile not-spots

2.59 Our Access and Inclusion work focuses on the priority areas above but is not limited to them. One area in which we are commencing additional work is mobile not-spots.

2.60 The Consultation drew responses from a number of stakeholders concerned about mobile coverage and in particular ‘not spot’ areas.

2.61 On 8 July 2009, Ofcom published Mostly Mobile – Ofcom’s mobile sector assessment second consultation.²⁷ We highlighted in this consultation that, while mobile network availability is generally good, coverage issue persist:

- For 3G coverage there is still a noticeable difference between rural and urban areas, and also between different parts of the UK.
- 2G coverage is unlikely to be extended further than today on commercial grounds, leaving a number of ‘not-spots’ across the UK.

²⁴ ‘Protecting your children in a digital world’ (<http://www.ofcom.org.uk/consumer/2009/10/managing-your-media-protecting-your-children-in-a-digital-world/>), ‘Parental controls for mobile phones’ (<http://www.ofcom.org.uk/files/2009/09/mobiles.pdf>), ‘Parental controls for games consoles and portable media players’ (<http://www.ofcom.org.uk/files/2009/09/consoles.pdf>) and ‘A guide for parents and carers on mobile location based services’ (<http://www.ofcom.org.uk/files/2009/10/location.pdf>).

²⁵ We have regulatory oversight of the operation of emergency calls up to the point where the call is handed over to the emergency authority.

²⁶ The 999 Liaison Committee brings together the emergency authorities (police, fire, ambulance and coastguard), the call handling agents for emergency calls (BT, Cable & Wireless) and fixed and mobile operators.

²⁷ The consultation is available at <http://www.ofcom.org.uk/consult/condocs/msa/>

- 2.62 The underlying issues are highly local. There is no single cause linking all coverage problems (nor, therefore, one standard solution).
- 2.63 We are about to embark on research in order to better understand the causes of ‘not-spots’ and the quality of service delivered by mobile broadband networks. We will also be liaising with mobile operators and public bodies to explore the contribution we could make to facilitate better coverage.
- 2.64 We provide links to mobile operators’ coverage checkers on our website (<http://www.ofcom.org.uk/consumer/2009/08/mobile-broadband-coverage-checker>).

Digital Radio

- 2.65 Digital radio is another area that may move up on our list of Access and Inclusion priorities, given Government’s plans for national and large regional services to transition to digital by 2015.²⁸
- 2.66 We are currently consulting on the implications of the proposals in the Digital Britain White Paper on our regulation of digital radio licensing.²⁹

We will provide regular updates on our Access and Inclusion through our Consumer Experience Report and Annual Plan

- 2.67 This statement closes our consultation process started in March 2009.
- 2.68 We look forward to continuing to work with stakeholders on Access and Inclusion issues. To facilitate this engagement, we have included a list of upcoming publications and milestones in section 13 (‘Next steps’) of this statement.
- 2.69 As the communications sector evolves and our work progresses we will continue to engage with our stakeholders on our future priorities. We will do so through our annual planning process. Our draft annual plan for 2010/11 will be published in December 2009.
- 2.70 We will continue to report on the impact of our Access and Inclusion work on citizens and consumers, and on the evolution of availability, take-up and effective use of communications services through our Consumer Experience report.
- 2.71 The Consumer Experience report has contained updates on our Access and Inclusion work since its first edition in 2006, and is therefore a strong vehicle for us and stakeholders to track our progress. The next edition will also be published in December 2009.

²⁸ See Digital Britain – Final Report, June 2009, Chapter 3b – Radio: Going Digital, <http://www.culture.gov.uk/images/publications/digitalbritain-finalreport-jun09.pdf>

²⁹<http://www.ofcom.org.uk/consult/condocs/radio/>

Section 3

Introduction

Background and scope

- 3.1 Ofcom's primary duty is to further the interests of citizens and consumers in communications matters. The widespread availability, take-up and effective use of key digital communications is important for society as a whole: for children to learn in the most effective way; for people to know about what is going on in their locality or in the wider world and engage with those events; for people to access public services or job markets effectively; or just to buy things at the most competitive prices.
- 3.2 Therefore, the inclusion of those who live in areas that are less well served by communication services or those who find it difficult to use existing services is an important issue for us.
- 3.3 The Act places various duties on Ofcom with regards to Access and Inclusion. Some of these are very specific, such as the regulation of social tariffs under the USO, others are more generic, such as having regard to the desirability of encouraging the availability and use of high speed data transfer services.³⁰
- 3.4 We discharge these duties through regulatory measures such as general conditions, the facilitation of industry agreements, research, and contributions through debates on Access and Inclusion matters.
- 3.5 However, it is not for Ofcom to resolve all these issues on its own. We are often required to work with others to deliver the right outcomes for consumers and citizens.
- 3.6 On 18 March 2009, we published the Consultation in which we described our understanding of our role with regards to Access and Inclusion and our proposed framework for identifying and assessing our priorities. We also outlined the state of our current work and envisaged next steps.
- 3.7 This statement follows on from the Consultation. It reiterates our framework – which was largely endorsed by stakeholders, provides an update on the progress we have made in our priority areas, and shows how we have taken stakeholder feedback into account.

Stakeholders were largely supportive of our approach

- 3.8 We received 40 responses to our consultation. We also engaged with stakeholders through Ofcom's Consumer Forum, our Advisory Committees and individual meetings with stakeholder organisations.
- 3.9 The great majority of stakeholders supported our proposed framework as well as our current priorities.
- 3.10 Many commented on our work in specific priority areas, e.g. on our work in the areas of broadband availability and take-up and the related Government plans.

³⁰ Section 3(4)(e)

- 3.11 Others highlighted the needs of specific groups of the population, such as people with disabilities, pointing out the opportunities to address these needs using communications technology, and stressing the importance of ensuring that services for these groups of people remain up to date as mainstream services evolve.
- 3.12 Some stakeholders pointed us towards further areas that, in their view, deserve greater attention, in particular mobile coverage.
- 3.13 Industry stakeholders reminded us of the cost associated with delivering against some Access and Inclusion objectives, e.g. universal service requirements.
- 3.14 Many stressed their own engagement in Access and Inclusion issues and their eagerness to contribute to future initiatives.
- 3.15 We highly welcome this constructive engagement. As this statement demonstrates, most of our Access and Inclusion work is carried out in close collaboration with our stakeholders. Where it is most successful is often the result of a joint effort between us, industry, government and the organisations from third sector that represent consumers' interests or the interest of groups with specific needs.

This statement concludes our Access and Inclusion consultation process

- 3.16 This statement closes our consultation process on Access and Inclusion. Its structure reflects the priority areas of our work:
- In section 4 we describe our role and duties with regards to access and inclusion;
 - In sections 5 and 6 we outline the framework that we use to identify and prioritise our Access and Inclusion work;
 - In sections 7 to 12 we provide progress updates on the priority areas identified in our Access and Inclusion consultation; and
 - In section 13 we summarise the milestones of our work going forward, and set out how we will provide updates on the progress of our Access and Inclusion work in the future and how we will involve stakeholders in setting future priorities.

Equality Impact Assessment

- 3.17 Ofcom is required by statute to assess the impact of all of our projects and practices on race, disability and gender equality. We fulfil these obligations by carrying out an equality impact assessment (EIA), which examines the potential impacts a proposed policy or project is likely to have on people, depending on their background or identity.
- 3.18 We conducted a full EIA for this project, in order to make sure that our Access and Inclusion work will not have adverse impact on promoting equality.
- 3.19 We have not identified any concerns in our analysis that our Access and Inclusion framework and work on our Access and Inclusion priorities could have a negative impact on race, disability and gender groups.
- 3.20 Individual projects mentioned in this report are conducting their own EIAs, looking in more detail at the proposed policies.

Section 4

Ofcom's role and duties

Ofcom's Access and Inclusion programme

- 4.1 'Access and Inclusion' describes a range of work undertaken by Ofcom to enable citizens to benefit from communications services, who might otherwise face obstacles in accessing and using these services.
- 4.2 It has long been recognised that communications services provide people with access to political, educational and cultural activities and resources. Developments in communications services like broadband mean that it is now easier to participate in civil society, to learn and develop new skills and to keep in touch and share information with friends and relatives.
- 4.3 The cost of providing communications networks typically means that some geographic areas will not be reached by commercial networks and will result in some citizens and consumers being excluded. In addition, the price of services, a lack of awareness and skills or the absence of usable equipment can also contribute to some groups of citizens facing exclusion from the benefits that communication services offer.
- 4.4 Understanding the issues that may exclude certain groups of people from benefiting from communications services, and using our powers and expertise to address them, is a central part of fulfilling our overarching duty to further the interests of both citizens and consumers.
- 4.5 We seek to make effective use of the powers given to us under the existing statutory framework. But our duties require us to do more: to inform, disseminate best practice and facilitate change as, for example, in our promotion of media literacy.
- 4.6 Our work both complements and reinforces that of Government, as well as the voluntary and private sectors.

Ofcom's Access and Inclusion duties

- 4.7 The Act gives us the principal duty to further citizens' and consumers' interests. All of our Access and Inclusion work contributes to this general duty. The Act then gives us a variety of specific duties to foster the availability of services as well as the ability of citizens and consumers to take up and use these services.

Box 1: Summary of Ofcom's duties under the Communications Act 2003

Section 3(1) of the Communications Act 2003 states that the principal duty of Ofcom is to:
(a) further the interests of citizens in relation to communications matters; and
(b) further the interests of consumers in relevant markets, where appropriate by promoting competition"

The Act also states that in doing so Ofcom needs to have regard to a number of factors.³¹ The following are of particular relevance to access and inclusion:

- The desirability of encouraging the availability and use of high speed data transfer services.
- The vulnerability of children and of others whose circumstances appear to Ofcom to put them in need of special protection.
- The needs of people with disabilities, of the elderly and of those on low incomes.
- The different needs of persons in different parts of the United Kingdom, of different ethnic communities and of persons living in rural and in urban areas.

The Act also sets out a number of more specific duties that are relevant to access and inclusion:

- To keep universal service tariffs under review and monitor changes to tariffs.³²
- To promote better public understanding of available electronic media material (media literacy)³³
- To take steps or encourage others to ensure availability of easily usable equipment.³⁴
- To put in place and enforce a code to facilitate use of television services by people with hearing and visibility impairments.³⁵
- To ensure (so far as is reasonable and practicable) people with visual impairments can use Electronic Programming Guides (EPGs).³⁶

- 4.8 Ofcom also has a specific duty to implement the Government's Universal Service Order, which sets out the services that should be provided as part of the USO. The existing Universal Service Order covers fixed line voice and dial-up internet services but does not presently extend to broadband.
- 4.9 Our statutory duties give us a broad range of Access and Inclusion issues to consider. We need to balance the benefits and costs of our regulatory actions, and also to be clear about our role, especially where it forms part of the wider public policy.
- 4.10 We have identified three types of possible paths of action, depending upon whether we are required to take the lead on an issue or work with others to achieve an outcome:
- **Ofcom has the power of decision:** We have the power of decision on two specific Access and Inclusion issues: we administer the current USO and the code for television access services. We will shortly be consulting on the implementation of the existing USO and we are currently consulting on TV Access Services. Both consultations consider whether under the current regime these services are delivering maximum consumer and citizen benefits.
 - **Our duties oblige us to act but where we do not have power of decision:** Where we have duties, but no specific powers we work with others to support change. To do so we need to maintain a robust evidence base to inform activity.

³¹ As set out at section 3(4).

³² Section 68(1) of the Act.

³³ Section 11 of the Act

³⁴ Section 10 of the Act

³⁵ Section 303 of the Act

³⁶ Section 310 of the Act

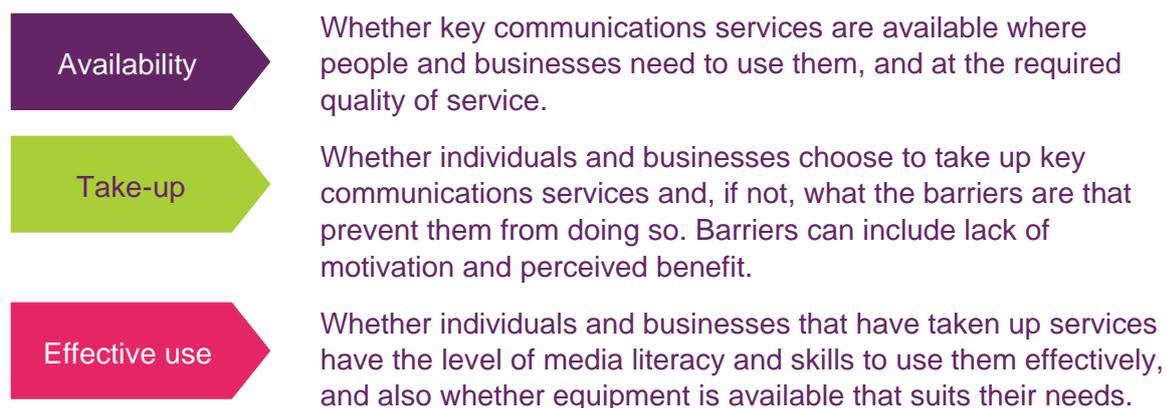
We aim to disseminate best practice, provide leadership and leverage our stakeholder relationships to deliver outcomes. An area of our work where we typically contribute in this way is Media Literacy. We also have a duty to carry out research regarding media literacy.³⁷

- **We contribute insights and expertise to the wider public policy debate as appropriate:** Where we have insights and expertise we can share, we are pleased to provide this to a broader debate as appropriate and requested from us. For example, Ofcom provided significant input into Government's Digital Britain White Paper. We provided the Government with analysis on existing broadband availability and proposals on how a Universal Service Commitment (USC) could potentially be delivered. Ofcom's research 'Accessing the internet at home'³⁸ was also used to inform Government.

How we identify and group Access and Inclusion issues

4.11 As we outlined in the Consultation, we see three main types of Access and Inclusion issues in the sectors we regulate: availability, take-up and effective use. We will use them as a framework to identify and consider Access and Inclusion issues as they evolve.

Figure 1: The three key areas of Ofcom's access and inclusion work



4.12 Examples of some of the issues that we are addressing in each of the three areas today are:

- **Availability:** Ofcom implements the universal service requirements set by the UK Government. Today's USO obliges universal service providers BT and Kingston Communications, among other things, to provide a fixed voice telephony connection upon reasonable request.³⁹ The line must be capable of supporting a dial-up modem to provide narrowband internet access.
- **Take-up:** We are leading a Consortium for the promotion of Digital Participation which will develop and deliver a Social Marketing Programme and Targeted Outreach as part of the National Plan for Digital Participation.

³⁷ Under section 14(6)(a) of the Act we have a duty to make arrangements for the carrying out of research into the matters mentioned in section 11(1), which complements our duty to promote Media Literacy.

³⁸ <http://www.ofcom.org.uk/research/telecoms/reports/bbresearch/bbathome.pdf>

³⁹ Where the cost of provision exceeds £3,400, the USPs may employ non-uniform pricing.

- **Effective use:** We are currently reviewing TV Access Services that allow people with disabilities to enjoy television content. These services include subtitling and programming in British Sign Language for hearing impaired users, as well as Audio Description for users with visual impairments.⁴⁰ We continue to promote a better understanding of media to empower people to make the most of the opportunities available safely and securely.
- 4.13 Today, the availability, take-up and effective use of broadband internet also stands at the centre of a number of public policy initiatives around Digital Participation. We will continue to contribute to these initiatives through our Access and Inclusion work.
- 4.14 At the same time we must ensure that the availability of important legacy services such as fixed voice telephony continues to be secured, and that measures to facilitate take-up and effective use by groups of the population that might otherwise be excluded, remain adequate in a changing market environment.
- 4.15 Disabled users often face challenges that touch upon all aspects of Access and Inclusion. The needs of disabled users are therefore a particular priority in our work.
- 4.16 Our work programme will evolve over time, as new generations of communications networks are rolled out and new devices and services come into the market.
- 4.17 Table 1 below summarises the framework of Ofcom’s Access and Inclusion work and sets out how these relate to our duties, the powers available to us and our function in each area.

⁴⁰ Audio Description is an additional narration on TV programmes that describes on-screen action, body language and facial expressions between programme dialogue.

Table 1: Summary of our duties and powers

Area	Duties (Communications Act 2003)	Powers and functions*
Availability	<ul style="list-style-type: none"> • Secure availability of a wide range of electronic communications services throughout UK (Section 3(1)(b)) • Secure availability of a wide range of TV and radio services (Section 3(2)(c)) • Have regard to desirability of encouraging availability of high speed data transfer services (Section 3(4)(e)) 	<ul style="list-style-type: none"> • We make regulations to designate at least one provider to meet all reasonable requests for fixed telephony access, and require provision of public payphones to meet needs in terms of geographic coverage through the USO. • We monitor and enforce coverage requirements in 3G mobile licences and in public service multiplex licences for digital TV. • We issue analogue radio licenses to cover specific geographic areas. Each licence includes a condition that requires the licensee to provide its service for as much of the licensed area as is "reasonably practicable". • We have no specific powers to encourage the availability of high speed data transfer services at the present time.
Take-up	<ul style="list-style-type: none"> • Have regard to desirability of encouraging use of high speed data transfer services (Section 3(4)(e)) • To keep universal service tariffs under review and monitor changes to tariffs (Section 68) • To promote better public understanding of available electronic media material (Section 11) 	<ul style="list-style-type: none"> • We have no specific powers to encourage the use of high speed data transfer services at the present time. • We can require appropriate tariff options and packages for low income subscribers. • We can require the prices of publicly available telephone services to be uniform throughout UK.
Ability to use services effectively	<ul style="list-style-type: none"> • To put in place and enforce a code to promote use of television services by people with hearing and visibility impairments. (Sections 303-7) • To ensure (so far as is reasonable and practicable) people with visual impairments can use the public teletext service (Section 308) and electronic programming guides (Section 310) • Have regard to the needs of people with disabilities, of the elderly and of those on low incomes, the vulnerability of children, and different persons in different parts of the UK (Section 3(4)(h),(i), (l)) • Take steps or encourage others to ensure availability of easily usable equipment (Section 10) • To promote better public understanding of available electronic media material (Section 11) 	<ul style="list-style-type: none"> • We can require provision of subtitling, audio description and sign language on certain proportions of television services. • We can take special measures to ensure that disabled users have access to affordable publicly available telephone services (fixed voice telephony). • We have no specific powers to promote easily usable equipment or better public understanding of media material.

* Communications Act 2003, Wireless Telegraphy Act 2006, the Electronic Communications (Universal Service) Regulations 2003.

- 4.18 While availability, take-up and effective use are helpful categories to identify specific Access and Inclusion issues they still need to be looked at in conjunction. In order to benefit from communications services people must have access to these services; they must also have the skills, confidence and suitable equipment if they are to use them effectively and participate fully in the economy and society more broadly.

Our Access and Inclusion work and Digital Britain

- 4.19 The Government's Digital Britain initiative touches upon a number of questions regarding the availability, take-up and effective use of communications services. The measures proposed in the Digital Britain White Paper include:
- a Universal Service Commitment to provide every household with broadband access at a speed of 2Mbit/s, and potentially public incentives to foster next generation broadband roll-out beyond market-led initiatives;
 - extension of 3G mobile coverage to match today's 2G coverage;
 - extension of digital radio availability and take-up to enable the transition of national radio broadcasting to DAB;
 - appointment of Martha Lane Fox as the Champion for Digital Inclusion, a Task Force to stimulate broadband take-up;
 - and the creation of a Consortium for Digital Participation; and
 - the development of a National Plan for Digital Participation .
- 4.20 We have engaged with Government in relation to the Digital Britain process as appropriate. Specifically, the Government called on us to lead a Consortium for the promotion of Digital Participation in the Digital Britain White Paper.
- 4.21 A number of stakeholders have asked us how our work Access and Inclusion work relates to the Government's Digital Participation initiative and our role in the Consortium. They have queried how we ensure that we exploit synergies and do not duplicate effort.
- 4.22 Our Access and Inclusion work covers the whole range of issues we conduct to fulfil the duties we are given in the Act.
- 4.23 The umbrella term 'Access and Inclusion' therefore covers a range of Ofcom-wide projects across all communications platforms that we undertake to discharge these duties. The various Ofcom project teams meet regularly to ensure that we co-ordinate our work in this important area.
- 4.24 The work of the Consortium for the promotion of Digital Participation has the potential to enhance, amplify and promote the work of a number of Access and Inclusion related Ofcom projects. These might include services for disabled people in telecoms and broadcasting, consumer information and media literacy. Therefore, it is anticipated that the outcomes of the Digital Participation project will contribute to Ofcom's overall Access and Inclusion work (and that this work in turn will enhance Digital Participation, as defined by the Government).

Stakeholder responses to our consultation questions

- 4.25 The Consultation asked respondents for their thoughts on our framework for Access and Inclusion and our description of our duties.

Question 2.1: Do you agree with the overall framework for assessing the components of access and inclusion of relevance to Ofcom?

- 4.26 Many organisations such as the British Standards Institute, David Hall Systems Ltd, McMurdo, PhoneAbility, Post Office Limited, Ricability, Scottish and Southern Energy, Tag and Vodafone supported Ofcom's framework for assessing the components of access and inclusion.⁴¹

- 4.27 BT commented in its response:

“The framework Ofcom proposes for its access and inclusion work – focusing on geographic availability of key communications services; take up of those services; and the effective use of them – is simple and effective... We therefore welcome Ofcom's bringing together of infrastructure challenges and inclusion issues in a single consultation for joint consideration.”

- 4.28 RNID felt that overall the framework is “sensible and appropriate”. However, RNID felt that the framework did not consider how to:

“[E]nable the provision of disability services that technologically are feasible and have great potential for addressing access and inclusion barriers, yet cannot be delivered by free markets alone.”

- 4.29 We are pleased to have received such broad support for our framework. This gives us the confidence to build on this framework in the future, and ensure that we focus on the concrete priorities for our work that flow out of it.

- 4.30 We strongly believe that our framework allows us to identify access and inclusion challenges faced by all citizens and consumers, including disabled people.

- 4.31 Services for disabled users are among the highest priorities in our Access and Inclusion work. We are pursuing a variety of projects to address them, using our formal powers and co-operation with other organisations.

Question 3.1: Do you agree with the types of possible interventions that our powers and duties offer us?

- 4.32 On the whole, respondents agreed with the types of possible interventions that our powers and duties offer us and felt that the balance was about right. PhoneAbility, for example, agreed that Ofcom should use its existing powers, and collaborate with others to support change where its powers are inadequate.

- 4.33 Broadband Britain.co.uk, Intellect, RNIB, RNID and the Scottish Council on Deafness all felt that Ofcom should seek additional powers to enable us to take a more active

⁴¹ Responses to our consultation can be found here:
<http://www.ofcom.org.uk/consult/condocs/access/responses/>

stance influencing the future of certain services such as universal service, equality of access, television access services, broadband availability and equipment usability.

- 4.34 Some stakeholders felt that we needed to ensure we apply our powers appropriately. BT for example, agreed with the evaluation of our powers but was keen to emphasise the need for us to apply our powers carefully to ensure we do not exclude industry members who could potentially contribute to funding, service delivery or innovation.
- 4.35 Stakeholders also reminded us throughout their consultation responses to be mindful of the cost and potential 'side effects' of regulation. Vodafone warned that in areas that fall outside of our remit, Ofcom needs to be careful not to become an advocacy body as this role is carried out by other organisations such as Consumer Focus and the Communications Consumer Panel.
- 4.36 Our statutory duties give us a broad range of Access and Inclusion issues to consider. To varying degrees, we have powers, expertise and influence to address these issues. Where we have the power of decision we will explore the case for action and, where appropriate, make effective use of our powers.
- 4.37 However, we are bound by the statutory framework within which we operate. This framework has to date had a particular focus on promoting widespread access of fixed line telephony and television, and Ofcom has had a defined role to play.
- 4.38 Whether to change this framework and add to or remove any of our powers or duties is a matter for Government, as are decisions over assignment of public funds to initiatives that foster the availability, take-up and effective use of digital communication services.
- 4.39 The UK Government has reviewed its policies for the communications sector through its Digital Britain initiative. At European level, changes to the legislative framework are currently under consideration and, as part of that process, we expect some relaxation in the rules relating to the scope of national USOs that can be funded by industry. In addition, we expect the European Commission to continue the wider debate on the future shape of universal service obligations at the European level, during 2010.
- 4.40 Should Ofcom be granted additional powers following the outcome of the legislative review (both at national and European level), we will review our role with regards to Access and Inclusion to ensure that we continue to fulfil our duties and apply any new powers given to us effectively.

Question 3.2: What do you see as Ofcom's future role in promoting Access and Inclusion?

- 4.41 Stakeholders overwhelmingly agreed with the key areas we had identified for our Access and Inclusion work and the role we propose to play. Comments and suggestions related primarily to the specific needs of the citizens and consumers they represent or the specific contributions from their sector or business.
- 4.42 BT for example saw Ofcom's role as threefold, namely:
- balancing industry needs against what the industry can deliver;
 - educating consumers and acting as a trusted source of information; and

- working with businesses to help them to understand their responsibilities and communicate with consumers effectively.
- 4.43 David Hall Systems considered that our future role would depend on the scope of our powers and could include research into the reasons why people do not have access and the relationship between different social groups and the way they consume communications, if this is within our remit.
- 4.44 TAG sees Ofcom's future role as balancing all three types of intervention we outlined⁴² in a positive manner, and was keen to see Ofcom making greater use of its influence to propose changes and bring these about.
- 4.45 We regard these responses as a sign that stakeholders strongly support our role in Access and Inclusion issues both now and in the future.

⁴² See paragraph 4.10 above.

Section 5

Priorities for our Access and Inclusion work

- 5.1 Developments in digital technology have led to a significant change in the communications services people use. In the past, most households would only have had a basic fixed telephony landline, a television with only five channels and an analogue radio service. Today a majority of households have multi-channel television, fixed and mobile phones as well as broadband.
- 5.2 In the Consultation we identified Access and Inclusion issues in the sectors we regulate based on our framework which we reiterated in section 4. We also identified a set of work programmes and projects as particular priorities.
- 5.3 We are required to fulfil a broad range of duties. In order to maximise citizen and consumer benefits we must regularly review our work and prioritise those issues which demand immediate attention and resources. We proposed in our Consultation that we would prioritise further Access and Inclusion work by considering the following aspects:
- How does a given service help facilitate participation over and above other communications services?
 - Are a majority of people actively using the service to participate, such that those without access are at risk of exclusion?
- 5.4 The priority we selected based on these criteria are:
- Broadband take-up and Digital Participation;
 - Broadband availability;⁴³
 - Services for disabled people;
 - The existing Universal Service Obligation (USO);
 - Media Literacy; and
 - Emergency mobile roaming.
- 5.5 Table 2 below shows the underlying reasons.

⁴³ In our Consultation we had grouped 'Broadband availability' and 'Broadband take-up' under one heading, however, given the significance of our work in both areas we now discuss both separately.

Table 2: Identifying our priority areas

Priority issue	Reasons for prioritising
Broadband take-up and Digital Participation	<ul style="list-style-type: none"> • Ofcom was asked by Government to lead a Consortium to develop and deliver a Social Marketing Programme and Targeted Outreach as part of a National Plan for Digital Participation. • Our research indicates that 73 per cent of adults aged 15+ have internet access at home with significantly lower rates among groups such as older people, people on low incomes, mobile-only households and disabled people. • Ofcom research has also shown that those without broadband today, and who do not intend to adopt it in the next six months, mentioned lack of interest and lack of affordability as the main barriers to take-up, indicating that broadband adoption may reach a plateau if no measures are taken to encourage take-up and address affordability issues.
Broadband availability	<ul style="list-style-type: none"> • Government considers that 2Mbit/s broadband should be universally available by 2012. • Broadband can provide direct access to public services and make it easier for citizens to participate in civil society, to learn and develop new skills and to keep in touch and share information with friends and relatives. • Availability over existing telephone lines is widespread at basic speeds of 512Kbit/s, but falls by up to 15 per cent if services such as video requiring faster speeds are a requirement. Cable networks and wireless networks offer alternatives, though the ability of wireless to deliver high and sustained bandwidths to large numbers of customers is limited by available spectrum. Not-spots in relation to speeds over 512Kbit/s are unlikely to be fully filled by market delivery.
Services for disabled users	<ul style="list-style-type: none"> • Access and use of communications services can bring massive benefits to disabled users. • Disabled users lag behind the average in terms of take-up of communications services, e.g. only 41 per cent of hearing impaired adults aged 15+ and 38 per cent of mobility impaired users have broadband access at home. • Disabled users have specific needs and therefore often belong to the groups of users whose needs are not met by commercial offers alone.
Review of existing USO	<ul style="list-style-type: none"> • The USO aims to ensure widespread availability and take-up of fixed voice telephony services and is enshrined in law. • However, market and technical developments may mean that we may need to change the way in which we implement the USO, potentially in terms of how services are delivered, procured and funded.
Media literacy	<ul style="list-style-type: none"> • Lack of interest and skills are among the barriers to people taking up services and using them effectively. • As people are brought online they will need the skills, information and tools to help them manage content and better understand the nature and context of media messages.
Emergency Mobile roaming	<ul style="list-style-type: none"> • Emergency mobile roaming is a safety of life issue. • When mobile customers are out of range of their own network they could not use other available mobile networks to call emergency services. • Mobile roaming for emergency services is available in other countries and was available in the UK until the mid 1990s.

- 5.6 Some of the areas of work we identified as priorities relate to major public policy debates and will require a strategic evaluation of requirements and the development of a broad programme of action involving multiple stakeholders.
- 5.7 Examples include broadband availability, broadband take-up and Digital Participation. These areas, among others, have been identified by the Government as priorities in its Digital Britain White Paper. Policy issues like these that concern every citizen, require a wide range of stakeholders all working together over a significant period of time in order to deliver the desired outcome.
- 5.8 Ofcom also carries out work that focuses on a more targeted issue, such as emergency mobile roaming. This work is also important to us, and can deliver significant benefits for citizens. In the cases of emergency mobile roaming the benefit is saving lives. In some of the specialised areas we consider, e.g. TV Access Services, Ofcom has specific duties and powers to deliver an outcome for citizens and consumers.
- 5.9 Our current priorities are made up of a mix of large public policy initiatives that we contribute to and more focused specialised areas of work.

Other areas of Access and Inclusion

- 5.10 Our Consultation considered communications services across the sectors we regulate, including mobile voice and data, super-fast broadband, digital television and digital radio. We considered all of these services when seeking to identify our priority areas as these mediums are all important for access and inclusion.
- 5.11 The reasons why we decided not to put these onto our list of priorities in March vary:
- In some cases, such as for digital TV in the context of digital switchover, access and inclusion measures have already been put in place by the government.
 - In other cases, such as for super-fast broadband and mobile broadband, services are only emerging, and are not yet available to or used by the majority of people.
- 5.12 Services in this second group may well grow in importance for Access and Inclusion over time, and we have indicated where we believe that they will do so.
- 5.13 Table 3 summarises our considerations.

Table 3: Further services considered

Service	Importance for Access and Inclusion	Service important for access and inclusion?
Mobile voice	<ul style="list-style-type: none"> Increasingly considered essential. High-level of take-up (86 per cent of adults 15+) and low levels of involuntary non-ownership (3 per cent of adults 15+, compared to 3 per cent involuntary non-ownership for fixed services). Availability of pre-paid services allows cost control and thus improves affordability. Overall good network coverage of 2G services (100 per cent using the existing methodology of measurement which looks at post code areas), however not-spots remain. 	Network coverage and not-spots of growing importance
Mobile data	<ul style="list-style-type: none"> Rapid take-up of mobile broadband services since 2007. Availability of 3G networks is at 90 per cent, using the existing methodology of measurement which looks at post code areas. Existing coverage is focused on areas with high population density; there are 'not-spots' as well as areas of poor quality coverage. 	Network coverage of growing importance.
Super-fast broadband	<ul style="list-style-type: none"> Little evidence that consumers or citizens need access to super-fast broadband now (over and above current generation broadband) to access online content, but position may change over time as the services supported by super-fast broadband stand to bring individual, social and economic benefits to UK household and businesses. 	Emerging service. Will be important in the future.
Digital television	<ul style="list-style-type: none"> Provides access to news, political, educational and cultural and community programmes. Measures are already in place to promote widespread availability and take-up as part of the digital switchover process. 	Yes; access enshrined in law.* However, measures to deal with Access & Inclusion issues already in place
Digital radio	<ul style="list-style-type: none"> Provides access to news, political, educational and cultural and community programmes. However this is also largely provided by near ubiquitous analogue radio. The majority of radio use continues to be via analogue platforms.⁴⁴ The Government has announced plans for national and large regional services to transition to digital by 2015.⁴⁵ 	Analogue radio important and widely available. Digital radio may become important in the future with full transition of national and large regional services.

* Public service broadcasters are required to provide digital television coverage for 98.5 per cent of the population.

⁴⁴ The Communications Market 2009 stated that approx one fifth of listener hours were delivered through a digital platform in Q1 2009 (The Communications Market Report, page 150, http://www.ofcom.org.uk/research/cm/cmr09/CMRMain_3.pdf).

⁴⁵ See Digital Britain – Final Report, June 2009, Chapter 3b – Radio: Going Digital, <http://www.culture.gov.uk/images/publications/digitalbritain-finalreport-jun09.pdf>

Emerging priorities

- 5.14 The case for including two additional services in our list of priorities appears to have grown since we launched our consultation: mobile voice and data services and digital radio.
- 5.15 Mobile devices offer the ability to communicate and use the internet (and potentially watch TV) while on the move. Mobility is clearly valued highly and regarded as increasingly essential by both individuals and businesses, so much so that there are now only a small proportion of households without access to mobile phones (9 per cent), and 86 per cent of adults aged 15+ personally own a mobile phone.
- 5.16 In our Consultation we prioritised work on the quality and extent of mobile access to emergency services. Since then, Ofcom has issued its second Mobile Sector Assessment consultation⁴⁶ that highlighted areas of concern, particularly over coverage.
- 5.17 In addition, where there are issues for particular groups, for example around usability for disabled users, we will address those concerns as a priority. For example, we are working with our Advisory Committee on Older and Disabled People (ACOD) to help ensure that potential users of SMS access to emergency services are aware of the current trial.
- 5.18 The services supported by super-fast broadband are likely to provide access to a wide range of video rich and immersive information and communications services that help participation in society and the economy. Therefore, although current generation broadband is the priority at the present time, the Digital Britain White Paper has proposed measures to support the widespread roll-out of super-fast broadband in the future.
- 5.19 Digital radio may also become more important in the future as it becomes more widely adopted. The Government suggested in its Digital Britain White Paper that the transition of national and large local AM and FM radio services to digital should take place by 2015. It proposes that this target will be supported by a Digital Radio Delivery Group, and is proposing legislative amendments that change the licensing rules for digital radio. We are reviewing our approach to radio licensing accordingly⁴⁷ and will remain close to the Government to stay abreast of the development of Digital Radio.

Stakeholder responses

- 5.20 As part of the Consultation, Ofcom included the following question:

Question 4.1: We have considered the ways in which mobile, broadband internet and digital radio services can facilitate participation in the economy and society. Our initial view is that of these three services, having access to broadband internet is likely to be the one requiring most immediate policy focus from an access and inclusion perspective, along with 999 roaming. Do you agree?

- 5.21 Stakeholders largely agreed with our approach to prioritising our Access and Inclusion initiatives and agreed that access to broadband internet and emergency mobile roaming were the right priorities.

⁴⁶ <http://www.ofcom.org.uk/consult/condocs/msa/>

⁴⁷ <http://www.ofcom.org.uk/consult/condocs/radio/>

- 5.22 The response from Members of the Scottish Parliament for the Highlands and Islands showed how essential broadband is in the wider social context:

“The Western Isles faces major economic challenges. Significant population decline has been a feature of many decades and securing a diverse range of employment opportunities [is] a continuing challenge. The Western Isles and many other parts of the West Highlands and other Island groups need every economic advantage they can obtain if they are to retain and grow population, widen employment and prosper into the future. Modern, fast digital communications is a vital part of that future.”

- 5.23 Similarly, the Welsh Assembly Government stressed the importance of having an emergency roaming solution in place:

“Given that 2G coverage by all mobile operators is not available in over one-third of postcode districts in Wales it is of particular importance that the gap in emergency service provision is abolished. The Welsh Assembly Government has evidence of citizens who state that they are unable to access mobile services where they live and this may affect their ability to call the emergency services, especially those in areas where the fixed line telephony network is also not reliable.”

- 5.24 Some stakeholders stressed the need to ensure that our list of priorities remains future proof and there were some requests for mobile coverage and TV Access Services on digital platforms to be included in our list of priorities.

- 5.25 Ofcom agrees that we will regularly have to review our priority areas as we conclude our objectives and new issues arise. Much of our Access and Inclusion work is ongoing, and issues such as broadband availability and take-up are likely to remain on our priority list in the near future. Proposed new priority areas will be included in our Annual Plan and finalised after feedback from stakeholders.

Section 6

Broadband take-up and Digital Participation

Why we consider Broadband take-up and Digital Participation a priority

- 6.1 In our Consultation, we identified broadband availability and take-up as top priorities for our Access and Inclusion work, due to the high potential of broadband services to enable wider participation.
- 6.2 Broadband internet⁴⁸ is used for a very wide range of purposes: for communicating, for work and studies, transactions, finding out the news, leisure as well as civic activities.
- 6.3 A lack of access to broadband has the potential to disadvantage citizens, and society, by excluding people from potentially important content, resources and cost savings. For example, school children without access to the internet at home may find it harder to carry out school assignments.⁴⁹ Those without web access may find it harder to research and subsequently find employment, develop skills or buy the most competitively priced products; businesses in certain regions may find it difficult to remain competitive if they cannot access particular communications services of sufficient quality.
- 6.4 This has also been recognised in the Government's Digital Britain White Paper:
- “We are at a tipping point in relation to the online world. It is moving from conferring advantage on those who are in it to conferring active disadvantage on those who are without, whether in children's homework access to keep up with their peers, to offers and discounts, lower utility bills, access to information and access to public services.”⁵⁰
- 6.5 Nevertheless, while BT has said that around 99.6 per cent of households could access a basic broadband service today, our research has shown that only 73 per cent do so. Take-up of broadband is significantly lower for older people (23 per cent for people aged over 75 years old), people on low incomes (42 per cent for people in households with income of up to £11,500 p.a.) and disabled people (only 41 per cent of hearing impaired adults aged 15+ and 38 per cent of mobility impaired adults have internet access at home).

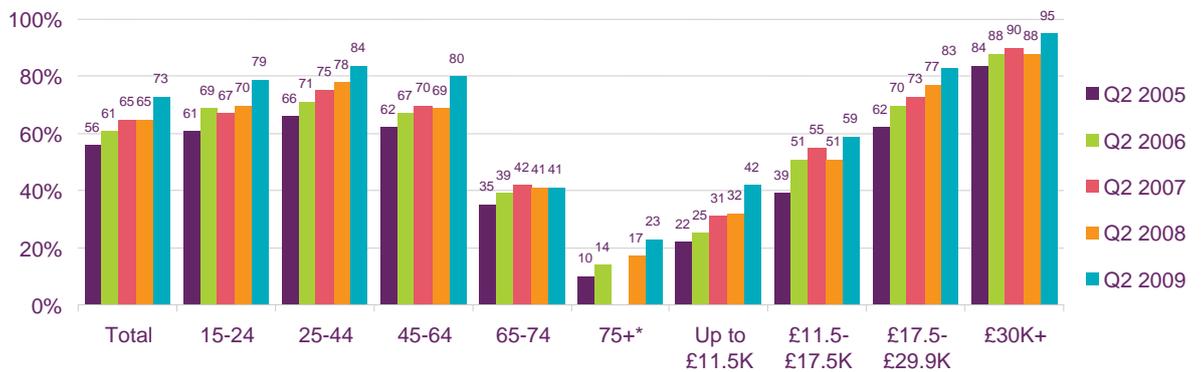
⁴⁸ As in our 'Accessing the internet at home' research (<http://www.ofcom.org.uk/research/telecoms/reports/bbresearch/bbathome.pdf>), we do not differentiate between users of broadband and dial-up connection for reasons of clarity and simplicity. In the first half of 2009, those with a dial-up connection only constituted two per cent of UK households.

⁴⁹ As noted in the Institute for Fiscal Studies report for the DCSF, Drivers and Barriers to Educational Success - Evidence from the Longitudinal Study of Young People in England “having access to a computer or the internet at home (at age 14) appears to be strongly positively associated with young people's educational attainment at age 16.” <http://www.dcsf.gov.uk/research/data/uploadfiles/DCSF-RR102.pdf>

⁵⁰ BIS and DCMS, Digital Britain: Final Report (2009), p. 11
<http://www.culture.gov.uk/images/publications/digitalbritain-finalreport-jun09.pdf>

6.6 Figure 2 below shows internet⁵¹ take-up by age group and income level.

Figure 2: Internet take-up



*Small base size; treat as indicative only
 Source: Ofcom communications tracking survey
 Base: All adults 15+ (Q2 2005, 2206) (Q2 2006, 2439) (Q2 2007, 2265) (Q2 2008, 2109) (Q2 2009, 2085)
 QE2. Do you or does anyone in your household have access to the Internet/ Worldwide Web at home?

6.7 In the first half of 2009 we conducted a survey of 1,841 adults aged 15+ who did not have access to the internet, in order to better understand barriers to take-up. 82 per cent of adults surveyed did not intend to get it over the next half year. 42 per cent cited a lack of interest in having the internet at home as the reason for this while just under one third cited reasons relating to cost or equipment. 43 per cent of all adults surveyed stated that they were not interested in getting the internet at home, even if provided with a free broadband connection and computer.

6.8 Given the detriment citizens and consumers without internet access might suffer from a social exclusion perspective, we consider it a high priority to contribute to the reduction of the gap between broadband availability and broadband take-up, and ensure that if some people choose not to take-up and use broadband services, they do so on the basis of an informed decision.

Our underlying statutory duties and powers

6.9 Under the Act, in carrying out its functions, Ofcom is required to have regard to the desirability of encouraging use of high speed data transfer services.⁵² We have taken this into account in considering the extent to which broadband take-up should be promoted.

6.10 Our duty to promote media literacy in section 11 of the Act is also relevant in this context. We are charged with promoting media literacy which includes encouraging the development of better public awareness and understanding of material available via the electronic media. While awareness is not the only barrier to take-up of broadband internet services identified by us in our Consultation and further research, it is clearly an issue which needs to be addressed in the context of any programme aimed at encouraging and facilitating broadband take-up.

⁵¹ Internet take-up includes fixed narrowband as well as broadband. However, fixed narrowband accounts for less than 3 per cent of the total.

⁵² Section 3(4)(e)

- 6.11 Although we have not been granted specific powers to encourage broadband take-up or promote media literacy, we are engaging with other stakeholders to fulfil our statutory duties in these areas.
- 6.12 In June 2009, the Government's Digital Britain White Paper called for Ofcom to lead a Consortium for the promotion of Digital Participation which should develop and deliver a Social Marketing Programme and Targeted Outreach as part of a National Plan for Digital Participation.
- 6.13 In this context, 'Digital Participation' is intended to have a wider scope than just media literacy, and was defined by Government as:

"Increasing the reach, breadth and depth of digital technology across all sections of society, to maximise digital participation and the economic and social benefits it can bring."⁵³

The objectives for our work and the citizen benefit we aim to achieve

- 6.14 Barriers such as a lack of perceived need and cost may prevent a significant minority of citizens from reaping the benefits that broadband internet can bring.
- 6.15 A number of existing Government and third sector initiatives are already addressing barriers to broadband take-up. Examples include Becta's "Home Access" initiative, UK Online Centres and the Milton Keynes PC refurbishment scheme.⁵⁴
- 6.16 Our contribution to stimulating broadband take-up has, so far, focused on providing research to contribute to the understanding of citizens' and consumers' use of digital communications services, including broadband. We have also aimed to contribute to an environment in which consumers benefit from a wide choice of services at affordable prices and can exercise their choice of provider with confidence in the exercise of our competition and consumer protection functions.
- 6.17 The Digital Britain process, launched by the Government in late 2008 identified broadband take-up as a key area of focus. Action 22 of the Digital Britain Interim Report called for Ofcom to work with "the BBC and others to recommend a new definition and ambition for a National Media Literacy Plan."⁵⁵ As a result, Ofcom established the Digital Britain Media Literacy Working Group (the Group) with members drawn from Government, Education, Industry and the Third Sector.
- 6.18 On 27 March, the Group delivered its response to Action 22 in the form of the 'Report of the Digital Britain Media Literacy Working Group'⁵⁶ which recommended a strategic and coordinated approach to promoting the interdependent areas of Digital Inclusion, Digital Life Skills, and Digital Media Literacy across the UK.⁵⁷ The Group

⁵³ Digital Britain – Final Report, June 2009, page 41,

<http://www.culture.gov.uk/images/publications/digitalbritain-finalreport-jun09.pdf>

⁵⁴ Becta (formerly known as the British Educational Communications and Technology Agency) is the government agency leading the national drive to ensure the effective and innovative use of technology throughout learning.

⁵⁵ Digital Britain – The Interim Report, Page 6666,

http://www.culture.gov.uk/images/publications/digital_britain_interimreportjan09.pdf

⁵⁶ http://www.ofcom.org.uk/advice/media_literacy/media_lit_digital_britain/

⁵⁷ The report does define these three areas as follows: "Digital inclusion - ensuring that all citizens have access to digital technologies, including broadband"; "digital life skills - the acquisition and development of skills which will increase the employment and social opportunities available to them"; "digital media literacy - the ability to use, understand and create digital media and communications".

also recommended the formation of a Consortium to develop and deliver a Social Marketing Programme.

- 6.19 These proposals were endorsed by government in the Digital Britain White Paper, where the Government announced proposals for a:

“National Plan for Digital Participation which combines an improved offer to increase motivation to get online, with social networking and outreach, and with skills training.”⁵⁸

- 6.20 In this context, the Government has asked Ofcom to lead the Consortium. Funding of up to £12m over three years will be made available to support this work from the Government’s Universal Service provision as announced in Budget 2009.⁵⁹
- 6.21 The work of the Consortium will be evaluated by government after 12 months.
- 6.22 We are pleased to lead the Consortium and are working with a significant number of stakeholders to agree Terms of Reference and priorities for action. Ofcom views this work as an important priority.

Our response to stakeholder comments

- 6.23 In our Consultation we asked stakeholders for their views on barriers to broadband take-up, and whether addressing these barriers should be a priority for us.

Question 6.1: Which of the barriers to take-up do you believe most pertinent, and for which groups in society? What other factors may be relevant?

Question 6.2: Do you agree that new measures may be needed to help lift broadband take-up, particularly to address low levels of take-up by disadvantaged groups, and that this issue should be a new priority area for Ofcom?

- 6.24 Most stakeholders agreed that broadband take-up should be an area of high priority on our Access and Inclusion agenda. We received a rich array of comments and insights on the challenges to encouraging further broadband take-up. A number of stakeholders made suggestions about how obstacles to take-up could be overcome. We welcome these helpful contributions.
- 6.25 One respondent felt strongly that we should focus on improving consumer protection and transparency in the broadband market as well as service availability, and that this would make further measures to encourage take-up unnecessary.
- 6.26 Our research shows, that the reason consumers state most frequently for not using broadband today is a perceived lack of need (rather than affordability and service availability). We believe that consumer protection, transparency and increased availability alone, will not reach these consumers and provide them with the stimulus and information they need to explore what broadband services could do for them, and make an informed choice whether to take up these services or not.

⁵⁸ Digital Britain – Final Report, June 2009, <http://www.culture.gov.uk/images/publications/digitalbritain-finalreport-jun09.pdf>

⁵⁹ See Digital Britain – Final Report, June 2009, <http://www.culture.gov.uk/images/publications/digitalbritain-finalreport-jun09.pdf>

- 6.27 However, we agree with stakeholders such as Vodafone and Orange who pointed out the importance of a competitive market to ensure affordable prices.
- 6.28 PhoneAbility and Orange expressed a view that citizens should be given the opportunity to make an informed decision not to take up broadband services. PhoneAbility said that it did not support “the contention that having a broadband connection is automatically beneficial to the user.”
- 6.29 Indeed it is not our intention in promoting broadband take-up to force those who do not wish to take up broadband to do so. Our aim is to ensure that citizens are able to make an informed choice as to whether they wish to access services which are available through the internet.
- 6.30 A number of stakeholders pointed out the importance of co-ordinating our work with government initiatives in this area, both centrally and in the devolved nations.
- 6.31 We share this view and are working closely with government and other stakeholders, in particular the members of the Consortium and consumer organisations. Furthermore, we are continuing to engage with our offices in the nations, advisory committees and media literacy networks in the nations to ensure that the work of the Consortium benefits citizens in all parts of the UK.
- 6.32 Stakeholders also highlighted their existing initiatives to foster Digital Participation. BT pointed out the important role that ISPs and content providers play in ensuring that “relevant, inclusive and easy to understand services are available to all”. The BBC highlighted the importance of attractive, safe content environments.
- 6.33 Ofcom recognises that that some stakeholders are already very active in this area and we believe the key to the driving Digital Participation will be helping to bring a wide range of stakeholders together who may be able to increase the scope and reach of their work. We are pleased that over 50 stakeholders from industry, government and the third sector have agreed in principle to join the Consortium so far and are offering their expertise and resources.
- 6.34 The importance of easy to use, accessible content and services was further highlighted in a number of responses. Some stakeholders focused on the challenges for disabled users and emphasized that this group of citizens could derive particular benefits from the internet, once access hurdles have been overcome. The RNIB and RNID pointed out that access to suitable equipment and services remain a significant issue for disabled users. The RNID felt that there is often a significant lack of awareness of disabled users’ needs, leading to the development of solutions that pose accessibility issues. Other respondents stressed that we should put emphasis on accessible services for all, rather than niche services (both to reach a wider audience, and to ensure those in need for accessible services are not left behind the mainstream market). The British Standards Institute pointed out that websites designed with accessibility in mind ultimately benefit all users.
- 6.35 We fully recognise the importance of accessible equipment and websites. While we have limited powers to develop or require the development of easily accessible equipment and services, we seek to influence and promote accessibility wherever we can. We discuss our work on services for disabled users in detail in section 8 of this statement. Our work includes research into the hurdles faced by disabled users, ensuring the availability of specific services for disabled user as part of universal service (not including broadband at this point) and work with other organisations to promote good practice and raise awareness of the needs of disabled users. Through

the Consortium and our wider work on media literacy, we will explore scope for initiatives that could encourage older people and people with disabilities to take up broadband services.

- 6.36 Some respondents suggested that we should consider alternative platforms for the delivery of online services such as digital TV and mobile to reach those citizens who find these platforms more familiar. The Consortium is taking a platform neutral approach to Digital Participation.
- 6.37 Stakeholders highlighted skills as another important obstacle to broadband take-up. The CWU / Connect considered that some citizens may not be able to fully benefit from computer training, as they lack basic literacy and numeracy skills. We are working in the Consortium with Becta,⁶⁰ NIACE⁶¹ and other organisations with experience in targeted outreach, to ensure that citizens receive the support they require to understand and take advantage of internet content and services.
- 6.38 Citizens Advice, Consumer Focus and others considered that the costs of computer hardware, service contracts, and other necessary items such as security software remain a hurdle for some citizens. Some individual stakeholders saw the need for a low use or low cost tariff for broadband.
- 6.39 Members of the Consortium are involved in initiatives aiming to reduce the affordability threshold for broadband take-up. Becta is embarking on the roll-out of its 'Home Access' programme across England.⁶² 'Home Access' provides computers, connectivity and support to low-income families. The programme has previously been trialled in Suffolk and Oldham. Consortium members are also in the early stages of exploring the possibility of developing a UK wide PC Refurbishment project with a view to addressing the affordability issue.
- 6.40 It is not currently within Ofcom's remit to provide for affordable equipment or software for low income or disabled users. However, we will continue to work with interested groups to facilitate the development of equipment and initiatives for low income and disabled users.
- 6.41 Consumer Focus Scotland and Scottish Screen pointed to regional differences in broadband take-up as an important issue to explore, citing examples in Scotland (e.g. low take-up in Glasgow compared to Aberdeen). The Welsh Assembly Government also highlighted the importance of granular research data. David Hall Systems thought it important to conduct further research to better understand the motivation and usage habits of different groups of the population.
- 6.42 These responses show the breadth and depth of challenges that the Government, the Consortium and other organisations will need to address to successfully encourage broadband take-up. We believe that a strong understanding of the challenges through research is one ingredient to successfully targeting the Consortium's Digital Participation work. We also believe that it is important to bring together a range of organisations with a wide range of skills, insights and capabilities – from national content and infrastructure players who can leverage their brand and reach to organisations on the ground who work directly with those likely to be targeted as part of the campaign and understand the support they require. We will

⁶² <http://becta.org.uk/homeaccess>

seek to ensure that the work of the Consortium addresses those challenges and continue to welcome stakeholder input on how these challenges may be met.

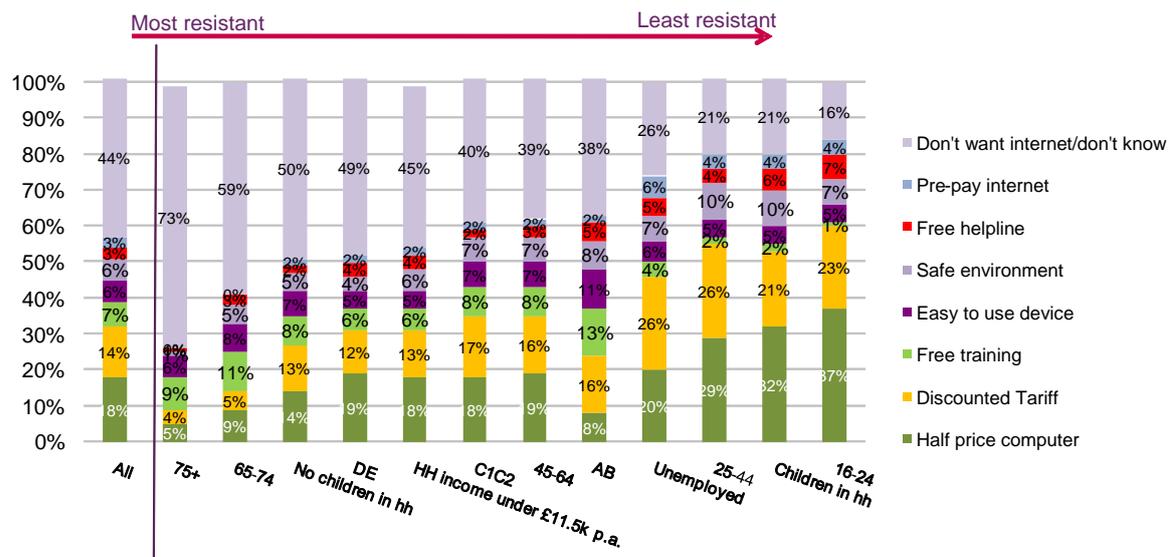
The work of Digital Britain and the Consortium for the promotion of Digital Participation

- 6.43 Since the publication of our Consultation in March the Consortium has been established and we are confident that this will lead to significant advances in the field of broadband take-up and Digital Participation. Ofcom itself has undertaken further work in this area and will continue to drive the agenda in encouraging and facilitating take-up.
- 6.44 As announced in our Consultation we also conducted qualitative and quantitative research into the reasons why households do not have access to the internet, carried out by Ipsos Mori. We published this research on 10 June 2009,⁶³ and have widely shared it since within the UK and with our international counterparts. Under our Media Literacy research programme, we have also published research on 'Digital Lifestyles' looking at specific groups of the population, such as parents of children under 16, young adults 16-24, adults over 60 and 'Hesitants, Resistors and Economisers'.⁶⁴ This research is also helping to inform the work of the Consortium for the promotion of Digital Participation.
- 6.45 We have identified three main groups from the research:
- **Those intending to get the internet in the next six months:** Just under two in ten people currently without the internet said they were likely to get connected in the next six months. They are more likely to be younger, regular internet users outside of the home who are working and have children.
 - **The self-excluded:** 42 per cent state lack of interest or need as their main reason for not wanting to take up the internet. The self-excluded tend to be older and retired and 61 per cent have never used a computer. This group shares a sense of indifference, with many struggling to come up with any reasons why they should have the internet at home.
 - **The financially/resource excluded:** 30 per cent of people stated that the internet was too expensive or that they didn't have the knowledge or skills to use it. Three in ten respondents in this group said the cost of a computer was the main reason for not having an internet connection, while 37 per cent said it is too expensive.
- 6.46 The appetite for getting the internet at home markedly decreases with age. It increases with socio-economic status and with the presence of children in the household. Younger people and households with children were more receptive to idea of financial incentives to encourage take-up.

⁶³ <http://www.ofcom.org.uk/research/telecoms/reports/bbresearch/bbathome.pdf>

⁶⁴ Our Media Literacy research can be found here:
http://www.ofcom.org.uk/advice/media_literacy/medlitpub/medlitpubrssi/

Figure 3: Appeal of ideas to encourage broadband take-up



Base: All respondents, 1841 (various subgroup base sizes)
 Q57. For each option, could you tell me how important it is in helping you get the internet at home?
 Source: Accessing the internet at home survey, February to April 2009

- 6.47 The Consortium’s mandate is to increase the reach, breadth and depth of digital technology use across all sections of society, to maximise digital participation and the economic and social benefits it can bring.⁶⁵ In the early stages of the work, it is likely that increasing reach (broadband take-up) will be a key priority. As more people go online the Consortium will be able to increase its efforts to promote greater breadth and depth of use (for social and commercial transactions, participation and engagement in society).
- 6.48 The Consortium will encourage people to change their attitudes and behaviour towards digital communication technologies by providing information, motivation and support to become engaged in a Digital Britain.
- 6.49 The Consortium’s programme of work will have three distinct aspects, the first two driven by the Consortium and the third critical leg by government:
- A Social Marketing Programme which will use a range of marketing and communications channels and techniques to change public attitudes and behaviours
 - Targeted Outreach to engage those who need more support. This direct outreach work could follow the digital TV switchover timetable and harness the interest raised in digital technologies by the digital switchover process.
 - Digital Switchover of Public Services to bring the benefits of online delivery of Government services to users.⁶⁶

⁶⁵ Digital Britain – Final Report, June 2009, Chapter 2 – Being Digital, paragraph 47, page 41, <http://www.culture.gov.uk/images/publications/digitalbritain-finalreport-jun09.pdf>

⁶⁶ See Digital Britain – Final Report, June 2009, Chapter 2 – Being Digital, paragraph 54, page 42, <http://www.culture.gov.uk/images/publications/digitalbritain-finalreport-jun09.pdf>

- 6.50 The idea of the Consortium has been received very positively by industry and the third sector. There are currently over 50 members, who have agreed in principle to contribute expertise and communications channels to promote Digital Participation.
- 6.51 Membership will be open to any organisations who can (i) use their communication channels to inform and motivate people to become engaged with digital technologies, or (ii) offer outreach to people who need support.
- 6.52 A review will take place 12 months after the start of the Programme to audit the effectiveness of this approach. The following metrics will be used:
- **Reach:** access; number of households online, and numbers using the Internet outside the home;
 - **Breadth of engagement:** modes of usage and consumption (communication, retail, content consumed, public services used);
 - **Depth of engagement:** user contributions, comments, joining networks, user generated content, self publishing, content creation, photos uploaded and shared, etc; and
 - **Social and economic impact:** particularly the impact on economic recovery and benefits for disadvantaged groups and communities.⁶⁷
- 6.53 The first meeting of the Consortium was held on the 15 September 2009, with over 40 members and interested parties present.
- 6.54 The Department for Business Innovation and Skills (BIS) and the Department for Culture, Media and Sport (DCMS) are central to discussions and decisions on the direction of the work on the Consortium.
- 6.55 To ensure that we maximise synergies between the Consortium members and avoid the possibility of duplicating effort, we are working closely with the leading organisations in the areas of Digital Inclusion and Digital Life Skills, in particular, the Champion for Digital Inclusion Martha Lane Fox, and the Digital Life Skills team in BIS who are working on implementing Baroness Estelle Morris's 'Independent Review of ICT User Skills', which looks at the basic computer skills required for adults to "take their first step online".⁶⁸

Next steps

- 6.56 The work of the Consortium is at an early stage and work has commenced on a number of work streams.
- 6.57 A National Plan for Digital Participation will be developed to outline the how the Consortium plans to increase the reach, breadth and depth of digital technology use across all sections of society, to maximise digital participation and the economic and social benefits it can bring.

⁶⁷ Digital Britain - Final Report, June 2009, page 44, <http://www.culture.gov.uk/images/publications/digitalbritain-finalreport-jun09.pdf>

⁶⁸ See Independent Review of ICT User Skills, Baroness Estelle Morris, June 2009, Section 1 – Executive Summary, page 6, http://www.dius.gov.uk/~media/publications/l/ict_user_skills

- 6.58 The different elements of the programme for promoting Digital Participation will include:
- A Social Marketing Programme which will use a range of marketing and communications channels and techniques which will aim to change public attitudes and behaviours across the three strands of Digital Participation:
 - Digital Inclusion (encouraging and supporting people to get online)
 - Digital Life Skills (gaining basic digital skills to increase employability and life chances)
 - Digital Media Literacy (using, understanding and creating digital media and communications)
 - Targeted Outreach which will be developed to provide targeted support for people as they start to engage with digital technologies and develop digital skills to improve their lifestyle and development opportunities.
- 6.59 The formal launch of the Consortium will take place on 15 October and the next Consortium meeting is scheduled for 1 December 2009.

Section 7

Broadband availability

Why broadband availability is a priority for us

- 7.1 The importance of having broadband at home should not be under-estimated. Recent research by the Communications Consumer Panel, *'Not online, not included'* showed that most people with broadband at home feel that they could not be without it; 73 per cent of those with the internet at home described it as essential or important.⁶⁹
- 7.2 Gaps in the geographic availability of broadband may arise because of a combination of factors such as the topography of a particular area, the structure and quality of historic network investments, as well as demographic factors and low population densities which can make particular areas unattractive to serve on a commercial basis.
- 7.3 Today, most households in the UK have access to broadband at basic speeds of up to 512Kbits/s – BT has previously stated that around 99.6 per cent of households are able to achieve this speed. This is similar to the availability of broadcast TV. However, the Government has set itself the target of ensuring that virtually every household in the UK has access to a 2Mbit/s connection by 2012.
- 7.4 We estimate that today ca.11 per cent, or about 2.75m, homes cannot readily get a 2Mbit/s broadband service. Due to the location and technical nature of remaining broadband 'not-spots', the 2Mbit/s target cannot be reached using a single technological solution, and possibly not even by one single organisation. However, together with government and industry we are among the organisations which are in a strong position to contribute to its achievement.
- 7.5 We therefore identified broadband availability as an area of high priority in the Consultation.

Our underlying statutory duties and powers

- 7.6 The Act requires us to secure the availability of a wide range of electronic communications services throughout UK,⁷⁰ and to have regard to desirability of encouraging availability of high speed data transfer services.⁷¹
- 7.7 Broadband is not currently covered by the legislation determining universal service. We therefore do not currently have any powers to directly influence broadband availability.
- 7.8 However, we have competition and consumer policy tools, and a wealth of information and expertise to contribute to a market environment that delivers widely available, affordable services to citizens and consumers. We can also work to inform, disseminate best practice and provide advice to government and industry stakeholders where appropriate.

⁶⁹ <http://www.communicationsconsumerpanel.org.uk/smartweb/not-online-not-included/not-online-not-included>

⁷⁰ Section 3(1)(b)

⁷¹ Section 3(4)(e)

The objectives for our work and the citizen benefit we aim to achieve

- 7.9 We contribute to broadband availability through a range of activities, not all of which fall primarily under the umbrella of ‘Access and Inclusion’ work.
- 7.10 The wide availability and affordability of broadband services today, and the benefits this delivers to citizens and consumers, have to a very large degree been driven by commercial investment and competition. We are contributing to this environment through our work on competition policy and consumer protection:
- We aim to create a competitive environment that allows investors who see a case for deploying networks to do so, encourages players to innovate and provide access to wholesale services at levels where competition can be effective and sustainable. This is the case for both current and next generation broadband.⁷² As a result, many areas of the UK have access to broadband at 2Mbit/s or more as competing networks deploy new infrastructure to serve those areas.
 - We aim to ensure that consumers are empowered to make informed choices as regards services and providers. Recently we published research on broadband speeds in conjunction with our technical partner SamKnows providing information to consumers about the actual speeds that they are getting from their broadband providers.⁷³
- 7.11 Despite the extensive roll out of broadband in the UK (according to BT around 99.6 per cent of households receive a speed of 512kbit/s), in certain areas broadband access remains limited, and ca. 15 per cent of households do not have access to a broadband connection that meets the Government’s 2Mbit/s target. To help facilitate solutions, where broadband is not being provided by the market, we provide advice and expertise to public bodies considering public investment in broadband schemes in a joined effort with government as in the case of the Government’s proposed Universal Service Commitment (USC).⁷⁴

Stakeholder responses

- 7.12 The Consultation asked respondents to consider whether they agreed that Ofcom should include current generation broadband availability as one of its access and inclusion priorities.

Question 5.1: Do you agree that Ofcom should include availability issues in relation to current generation broadband and the ability to call the emergency services from another network if one’s own network is unavailable in its immediate access and inclusion priorities?

- 7.13 Stakeholders agreed with our proposal to include broadband availability as one of our priority areas. The British Standards Institute believes that “a robust digital economy is vital if the UK is to retain a competitive edge in the global market place.”
- 7.14 Respondents set out the importance of broadband to the various types of consumers each represented. For example, Hearing Concern Link spoke of the “potential

⁷² See the regulatory principles we apply to Super-fast Broadband in http://www.ofcom.org.uk/consult/condocs/nga_future_broadband/statement/statement.pdf

⁷³ <http://www.ofcom.org.uk/media/features/broadbandspeedsjy>

⁷⁴ ‘Public Broadband Schemes: a best practice guide’, DTI/Ofcom, February 2007, available at <http://www.berr.gov.uk/files/file37744.pdf>

broadband has for disabled people in terms of e-mail, instant messaging, flexibility of terminal display and improved internet-based relay.”⁷⁵ RNIB welcomed our prioritisation of availability issues, especially in rural areas, as “many blind and partially sighted people in rural areas are limited in their access to larger towns due to transport issues and find it hard to travel to a shop, bank or library to access services and the goods they need.”⁷⁶ The Welsh Assembly Government voiced concerns that the USC may not be truly universal and not reach all households that do not currently have access to broadband.

7.15 Many respondents took the opportunity to link the debate to the Government’s Digital Britain initiative and provided comments on the proposal to implement a 2Mbit/s USC for broadband in the interim and final reports.⁷⁷

7.16 On the whole respondents felt that the 2Mbit/s target was adequate today. They stressed that is important that broadband services remain future proof, e.g. that any provisions for the further roll-out of broadband be made with a view of a potential future upgrade to next generation access.

7.17 For example Consumer Focus stated:

“[W]e feel that the focus on broadband internet should include next generation or ‘super-fast’ broadband...The roll out of next generation broadband is likely to drive the bottom line for delivery of the universal service commitment in broadband as average speeds and patterns of usage will change, and if not managed will create a further divide in society with significant social exclusion implications.”

7.18 Scottish Screen also took the opportunity to comment on next generation or super-fast broadband:

“Super-fast broadband can and should become an essential tool for all citizens to participate fully in the democratic process and in social and cultural life, as well as engaging in economic activity as informed and empowered consumers. While the private sector should play a leading role, we also believe that the public sector has a key part to play in addressing market failure in the provision of super-fast broadband.”

7.19 The Government has made clear that the USC will need to evolve with time. It is setting up a Network Design and Procurement Group to deliver the USC.⁷⁸ This group will need to consider the practical questions of delivering the service as part of the procurement process, for example the additional cost of various degrees of ‘future proofing’ and the most appropriate technical solution to pursue.

7.20 While it welcomed measures to increase availability and take-up, Orange considered that Ofcom’s powers in relation to broadband availability were limited and it was unclear how any Ofcom action would interact with the Digital Britain process.

⁷⁵ Page 2 of Hearing Concern Link’s Response.

⁷⁶ Page 7 of RNIB’s response.

⁷⁷ The Government outlines its USC proposal in Digital Britain – Final Report, June 2009, Chapter 3a - A Competitive Digital Communications Infrastructure, paragraph 32ff., page 53ff., <http://www.culture.gov.uk/images/publications/digitalbritain-finalreport-jun09.pdf>

⁷⁸ See Digital Britain – Implementation Report, August 2009, http://www.culture.gov.uk/images/publications/DB_ImplementationPlanv6_Aug09.pdf

- 7.21 As set out further in this section in more detail, Ofcom has been providing technical support and advice to in relation to the Government's USC proposal upon Ministers' request.
- 7.22 Some respondents to our consultation suggested Ofcom include universal broadband within our review of the current USO. However, the USO and the USC each have a very different status within our duties.
- 7.23 The USO is enshrined in law. It defines a set of services to be universally available. The services included are determined by European legislation and the Universal Service Order in the UK. Ofcom is then responsible for the implementation of the matters contained in the Universal Service Order through the USO. Broadband is not currently within the scope of either the European legislation or the Universal Service Order. Ofcom does not therefore have the power to include broadband within the USO. The decision whether to include new services into the USO needs to be made at European and government level.
- 7.24 The current USC, by contrast, is a public policy initiative by the UK Government, which we engage with based on our general duties.
- 7.25 This is why we are looking at the USO and USC separately, even though both are high priorities for us. We co-ordinate our work on both carefully.

Progress made since the consultation was published

- 7.26 One of the key objectives emerging from the Digital Britain White Paper was the need to upgrade and modernise our digital networks, to provide an infrastructure that enables Britain to remain globally competitive. More specifically, the Government set out its intention to deliver a USC at 2Mbit/s by 2012.
- 7.27 Ministers asked Ofcom to provide technical support and advice in relation to the Government's target of a 2Mbit/s broadband universal service commitment by 2012.
- 7.28 Over the last six months we have supported the Government in understanding and quantifying the causes of broadband 'not-spots' and low connection speeds in more detail and explore the most effective solutions to deliver the Government's its 2Mbit/s target.
- 7.29 Around half of homes in the UK have the option of taking cable broadband, and all these connections are capable of supporting 2Mbit/s (the entry level service from Virgin Media now offers up to 10Mbit/s).
- 7.30 The large majority of homes outside of the cable networks use broadband delivered over BTs telephone lines, using ADSL technology. Of these lines, approximately 15 per cent are currently unable to support 2Mbit/s broadband. The main reasons we identified for this are:
- Excessive distance between a household and the BT exchange. The further away the premises are from a local exchange, the slower the broadband speed. We estimate that half a million homes are on lines that are too long to support 2Mbit/s broadband.
 - Line quality. Poor cable joints or water ingress can degrade the electrical performance of telephone lines. Some of these issues can be addressed by network maintenance engineers.

- Unexpected electrical interference or ‘noise’. Electrical interference with the broadband signal can reduce speeds. Typical sources of interference are faulty power supplies, or fluorescent lights. In home telephone extension wiring can act as an antenna and pick this noise up. A cost effective solution to the ‘noise’ problem is to add electrical filters on telephone sockets to reduce the level of noise ingress.
- 7.31 The analysis we undertook indicates that approximately 2.75m households are unable to achieve 2Mbit/s broadband today. We estimate that one third of these households could get 2Mbit/s by taking relatively simple measures, for example by addressing problems within home telephone wiring and fitting electrical filters to telephone sockets.
- 7.32 BT Retail has recently begun supplying this filter or “broadband accelerator” to its customers free of charge (subject to consumers paying postage and packaging). It is hoped that this type of industry led initiative will make a significant contribution to achieving the Government’s targets.
- 7.33 But for the remainder of homes, many of whom have telephone lines that are too long to support these speeds, alternative solutions are required. Due to the location and technical nature of the problems faced in supplying broadband at the required speed, no single solution will fit these ‘not-spots’ in all circumstances. We have been considering a variety of technical solutions, including wireless and ‘fibre to the cabinet’ technologies as a solution to these issues and are also keen to ensure that solutions are ‘future proof’, in that they provide an efficient upgrade path to super fast broadband.
- 7.34 Ultimately, the Government’s Network Design and Procurement Group will take the procurement of suitable solutions forward.

Next steps

- 7.35 While increasing the availability of broadband is undoubtedly a significant step in raising broadband penetration, it is unlikely alone to be sufficient to drive a significant increase in take-up of broadband services. Full availability will not guarantee ubiquitous take-up.
- 7.36 Therefore, we will continue to provide expertise and support to the implementation of the USC where relevant, but we will also continue to consider what actions can be taken to encourage further take-up.

Section 8

Services for disabled users

Why services for disabled users are a priority for us

- 8.1 Disabled people are active users of communications services. In some cases they have higher than average use of key services. Ofcom research has found that disabled people watch more television than average and recent research from RNIB suggests that radio is more important to blind and partially sighted users than to sighted users.⁷⁹
- 8.2 In other areas, take-up by disabled users lags the average, for example with regards to broadband take-up and take-up of mobile services. In comparison to average users, disabled people face additional issues regarding the availability and affordability of suitable equipment and services and often belong to the groups of users whose needs are not met by commercial services alone.
- 8.3 Therefore, the Consultation identified services for disabled people as a priority area.

Our underlying statutory duties and powers

- 8.4 Ofcom has a duty to have regard to the needs of people with disabilities, of the elderly and of those on low incomes, the vulnerability of children, and different persons in different parts of the UK.⁸⁰
- 8.5 We have specific duties with regards to television services to put in place and enforce a code to promote use of television services by people with hearing and visibility impairments⁸¹ and to ensure (so far as is reasonable and practicable) people with visual impairments can use the public teletext service⁸² and electronic programming guides, which are the gate to digital television.⁸³
- 8.6 As part of the USO we are required to take special measures to ensure the provision of, and the provision of access to, relay services for end-users with a disability where required to ensure access to publicly available telephone services by such end-users.⁸⁴
- 8.7 We must also take steps or encourage others to ensure availability of easily usable equipment.⁸⁵

The objectives for our work and the citizen benefit we aim to achieve

- 8.8 Ofcom is committed to ensuring equivalent access to communications services for disabled people. The Consultation set out Ofcom's commitment to work to tackle the most critical issues that they face.

⁷⁹ Are you really listening? (i2 media research on behalf of RNIB, 2009), http://www.gold.ac.uk/media/i2_RNIB_AreYouReallyListening.pdf

⁸⁰ Section 3(4)(h), (i) and (l).

⁸¹ Sections 303 to 307.

⁸² Section 308.

⁸³ Section 308 and 310.

⁸⁴ Universal Service Order, Article 2, 6(2)(c)6(2)(c).

⁸⁵ Section 10

- 8.9 To enable us to do so, we will pull together the findings of existing research and review, in conjunction with stakeholders, to identify the most critical issues facing disabled people when using communications services and what can be done to help address them.
- 8.10 Our current work programme to address the needs of disabled users includes a range of areas:
- Television Access Services;
 - Text relay services; and
 - Usability and affordability of equipment.
- 8.11 In addition, jointly with our partners Mencap, we have developed a Media Literacy education resource (Switch On!) for practitioners working with people with learning difficulties and disabilities. We are delighted that the National Open College Network (NOCN) Media Literacy Entry level qualifications have been approved and were made available in August. This is the first media literacy qualification for people with learning difficulties and disabilities.

Stakeholders responses and progress of our work

- 8.12 In our consultation, we asked whether stakeholders agreed that tackling the barriers that disabled people face when using communications services should be a priority, and that as part of this our review should assess the case for introducing improved relay services.

Question 7.1: Do you agree with our assessment that tackling the barriers that disabled people face when using communications services should be a priority, and that as part of this our review should assess the case for introducing improved relay services for hearing impaired people?

Question 7.2: Are there other issues in the area of effective use of key services that you believe are particularly critical for consumers and citizens? Please support with evidence where possible.

- 8.13 There was strong support from the majority of respondents for tackling the barriers that disabled people face when using communications services.
- 8.14 A number of stakeholders commented on specific initiatives we are working on. Furthermore, broadband access for disabled users was highlighted as an area that we should pay attention to.
- 8.15 In response to question 7.2, stakeholders highlighted a variety of issues, such as media literacy, ICT skills, affordability and contract conditions, and service quality. We have addressed these comments throughout the statement in our sections on broadband take-up, media literacy, and broadband availability in relation to citizens generally and believe that those initiatives will also benefit disabled users. Where additional input is required to ensure that the particular interests of disabled users are met, we will continue to seek new initiatives.
- 8.16 Below we discuss these comments by area of our work programme, and outline which progress we have made.

Television Access Services

- 8.17 The Act requires Ofcom to publish and from time to time review and revise a 'Code' setting out how television services should promote the understanding and enjoyment of television by people who have hearing or visual impairments, or who have a dual sensory impairment (deafblind).
- 8.18 The Act prescribes quotas for broadcasters (as defined by Ofcom) to subtitle 80 per cent, sign 5 per cent and audio describe⁸⁶ 10 per cent of all programmes by the tenth anniversary of the relevant date for each channel, as well as a subtitling quota to be reached by the fifth anniversary (60 per cent).⁸⁷
- 8.19 In September, we published the 2009 Review of Television Access Services. The consultation, which focuses on three key issues arising from the Television Access Services Code, considers:
- whether the criteria for selecting which channels provide access services remain fit for purpose;
 - if the current exemption from providing access services which is applied to channels targeting areas outside the UK should be re-examined; and
 - whether there is a case for recommending an increase in the audio description quotas to Government.
- 8.20 In our consultation, we indicate our view that the Television Access Code continue to strike a reasonable balance between benefits to users and the financial burden on television channels.
- 8.21 In response to the consultation on Access and Inclusion, a number of stakeholders have suggested that Ofcom needs to consider the provision of access services on VOD services in the future.⁸⁸
- 8.22 Ofcom recognises that this platform is becoming an increasing popular way for viewers to consume television programming, and that very few providers currently supply access services. However, Ofcom does not currently have the power to require VOD providers to ensure that access services are provided for such programming. Ofcom has therefore been unable to address this issue in the 2009 review of television access services under the existing legislation.
- 8.23 Nevertheless, provision of access services by VOD providers is covered by the new Audio Media Services Directive (AVMSD) which comes into force on 19 December 2009. The Government has drafted regulations that will amend the Act to give effect to AVMSD, which will include a condition for Ofcom to take forward the requirement

⁸⁶ Audio Description is an additional narration on TV programmes that describes on-screen action, body language and facial expressions between programme dialogue. Specifically produced for each programme, it allows people who have difficulties seeing the TV to hear what they can't see

⁸⁷ The 'relevant date' is 1 January 1997 for BBC 1 and 2, 1 January 1998 for Channel 5, and 1 January 2000 for Channels 3 and S4C Digital. For digital television programme services that began before 29 December 2003, the date is the entry into force of the legislation, (29 December 2003). For services starting after 29 December 2003, the relevant date is the date on which provision of that service commenced.

⁸⁸ VOD allows viewers to request and access programmes at a time of their choosing via their television or computer

to encourage media service providers under their jurisdiction to ensure that their services are gradually made accessible to people with a visual or hearing difficulty.⁸⁹

8.24 We are currently consulting on how we propose to fulfil our new statutory duties relating to the regulation of VOD services.⁹⁰ As we explain in that consultation, while we are proposing to designate another body with a range of powers in relation to regulation of VOD editorial content, we are proposing to retain the obligation to encourage VOD service providers to ensure that their services are gradually made accessible to people with sight or hearing disabilities. This is for three main reasons:

- We have expertise and a proven track record in this area;
- many VOD services are provided by broadcasters, who have a track record of dealing with Ofcom, in relation to the Television Access Code relating to linear broadcast services; and
- in fulfilling its duties in relation to linear television, Ofcom has established links with broadcasters; providers of access technologies, and in particular advocacy groups representing the views of people with disabilities.

8.25 Over the next few months Ofcom will be discussing with VOD providers what plans they have in this area and, following the enactment of regulations granting Ofcom powers and duties in relation to access services on VOD, Ofcom will consider the appropriate means of regulation.

Text relay

8.26 Text relay is used by deaf, hard of hearing and speech impaired people (referred to here for brevity as 'hearing impaired') to make telephone calls. It involves a relay assistant in a call centre, typing what the hearing person says and voicing what the hearing impaired person types. The hearing impaired person needs equipment to use the service, either a text-phone or an enabled mobile handset.

8.27 BT currently provides the text relay service in the UK as it has a responsibility under the USO to provide a relay service. All communications providers are required to offer relay services to their customers through that BT service, BT is allowed to recover the costs of access to the text relay service from other communications providers, so long as such charges are fair and non-discriminatory. Publicising the availability of the relay service is the responsibility of all providers of publicly available telecommunications services.⁹¹

8.28 Many organisations, including ACOD, the Scottish Council on Deafness, RNID and TAG, supported assessing the case for improved relay services as part of this work. There were also wide-ranging suggestions on next steps and improvements, such as publicising the availability of text relay, and making use of web and mobile applications. Ofcom's Advisory Committee for Scotland pointed out that while text relay services were important, it was also important for service providers to offer more than one means of contact, for example an accessible website, to make their

⁸⁹ Article 3c of Directive 2007/65/EC of the European Parliament and of the Council.

⁹⁰ Our consultation can be accessed here: <http://www.ofcom.org.uk/consult/condocs/vod/>. It is open until 26 October 2009.

⁹¹ Ofcom has recently written to all relevant communications providers to remind them of this obligation.

services accessible to disabled consumers. Vodafone pointed out the very limited take-up of text relay relative to the widespread use of SMS text among deaf and hard of hearing customers.

- 8.29 Several stakeholders commented on how the text relay service should be funded. Views expressed included that funding for relay services should be mandated as part of a wholesale obligation that all providers should contribute to services, and that Ofcom must ensure that regulation does not stifle innovation.
- 8.30 Ofcom welcomes stakeholders' support for our work in this area.
- 8.31 As a first step of our review, we asked Plum Consulting to conduct an independent study into the telecommunications needs of people with hearing impairments, the extent to which these needs are met by existing services and the extent to which new relay services might deliver increased benefits. As part of its study, Plum interviewed key stakeholders and sought individual feedback from 21 people with varying hearing impairments, each of whom had experience of both the current text relay and an enhanced relay service, i.e. either captioned telephony or video relay. Based on this feedback, Plum suggested that, while the existing text relay service is valued by people who use it, it does not allow fluid conversations and does not by itself meet the telecoms needs of hearing impaired people.
- 8.32 While hearing impaired people make extensive use of mainstream technologies, such as email, SMS and instant messaging, Plum's research suggested that they see these services as a complement to voice telephony. Messaging services often involve a time lag and do not enable a natural conversation in the way that a telephone call does. The people interviewed by Plum did not see the messaging services they used as equivalent to conventional voice telephony. They felt that enhanced relay services would deliver real benefits to them, such as increased confidence and independence in their social interactions and greater efficiency in the workplace.
- 8.33 We are considering the future of text relay services as part of our review of the USO, discussed further in section 9. Our USO Consultation, to be published later this year, will set out a framework which we expect to use to consider the social value of the various USO elements, including text relay.
- 8.34 It is also important to note that the existing relay service is valued by people who use it and that there are areas where it has improved in recent years. The introduction of the TextDirect platform in 2001 meant that users could receive automatic rebates on their bills to compensate them for the extra time taken by the call. This platform also enables users to place their own calls rather than rely on a relay assistant to do this.
- 8.35 We are committed to ensuring that the existing text relay service keeps up with technological change – for example, mobile access to text relay has been mandated since 2003. It is also possible to access a relay service using a laptop computer and suitable software, and this can be done while away from home, for example via mobile broadband or wireless internet.
- 8.36 It is vital that the text relay service is of a high quality, and Ofcom has published quality of service standards that have been agreed with BT as the provider of the service. Statistics showing performance against these standards are published on the www.textrelay.org website.

Usability and affordability of end-user equipment

- 8.37 Several respondents commented on the importance of ensuring that end user equipment is easy to use. Views included that Ofcom should be given extra powers to allow it more scope to influence the supply of terminal equipment with the appropriate features.
- 8.38 A number of respondents, including the Research Institute for Consumer Affairs, also raised the issue of affordability of end-user equipment.
- 8.39 While Ofcom has no specific powers regarding usable end-user equipment (such as telephones and TV remote controls), we are keen to promote and influence activity in this area where we can.
- 8.40 We also welcome initiatives by other organisations, such as the recent Global Accessibility Reporting Initiative (GARI). Under this initiative, detailed information about the accessibility features of mobile handsets is published at www.mobileaccessibility.info. It is possible to search for handsets by feature, for example, whether magnetic coupling is provided for telecoil equipped hearing aids.
- 8.41 In July 2009, ACOD published research, funded by Ofcom, on usability.⁹² The objective was to understand how manufacturers, suppliers and retailers of domestic communications equipment, products and services address the requirements of older and disabled people. Its findings are based on confidential in-depth interviews with senior figures from the consumer electronics and media products and services supply chain. Sectors sampled included broadcasting, telecommunications and online products and services.
- 8.42 The people interviewed came up with a range of positive suggestions. These included the need for senior level company leadership to champion the requirements of older and disabled people and use of the power of procurement to encourage design for usability.
- 8.43 ACOD concluded that unless further encouragement is put in place, the current economic downturn and competing commercial pressures are likely to limit the extent to which industry is able to better address the needs of older and disabled people. It recognised that any intervention would need to be sensitive to the global nature of many parts of the communications industries, and the various standards regimes for different sectors.
- 8.44 There are clear benefits from mainstream communications equipment being both more usable and more accessible. However, there will also always be a need for specialist equipment, which tends to be more expensive than mainstream equipment.
- 8.45 There are a number of demand-side initiatives under which disabled people receive money from the public purse to buy the equipment they need. The Government's Access to Work scheme can help to fund the cost of equipment or alterations to existing equipment needed in the workplace, for example, textphones or induction loops. Social services can provide equipment such as textphones or amplified phones. Increasingly, social services are providing direct payments so that people can buy equipment of their choosing. There are also benefits that are designed to increase disabled people's spending power, e.g. Disability Living Allowance. In

⁹² Available at http://www.ofcom.org.uk/research/usability/older_disabled/research/

addition, specialist equipment for disabled people does not attract VAT, unlike mainstream equipment.

Broadband access for disabled users

- 8.46 A number of respondents, including the Communications Workers Union and Connect, stressed the importance of broadband services for people with disabilities. The RNIB called for a universal service obligation for broadband and mobile. PhoneAbility suggested that users need to be shown the potential benefit to make an informed decision about whether broadband is relevant to them.
- 8.47 Ofcom recognises the importance of broadband to all consumers. We also understand that disabled people in particular may find it easier to get goods and services online than on the high street. Our commitment to encouraging consumers to take up broadband and to use it effectively is clearly demonstrated by our active engagement with the Consortium and our wider work on media literacy.
- 8.48 In addition, ACOD is commissioning research into the products and services that high speed broadband might be able to deliver that could benefit older people and people with disabilities.

Emergency SMS

- 8.49 A national trial of emergency SMS began on 14 September 2009, organised by the 999 Liaison Committee. If all goes well, we expect emergency SMS to be made permanent in early 2010.
- 8.50 The trial involves real people who have registered in advance sending genuine emergency messages. People who are not registered but who send a text message to 999⁹³ will receive an automated reply saying that they are not registered. This service is intended for people who cannot make voice calls because of their hearing loss, speech impairment or other disability. However, users are not required to provide any details of disability when they register.
- 8.51 The introduction of emergency SMS was strongly endorsed by the Scottish Council on Deafness and by PhoneAbility. Vodafone confirmed its commitment to emergency SMS, which it said demonstrates corporate social responsibility in an area where there has been no regulatory compulsion.
- 8.52 The trial is supported by the emergency services, government, the RNID, 3, BT, C&W, O2, Orange, T-Mobile, Vodafone and Ofcom. The mobile network operators have each contributed to the necessary upgrade to BT's existing text relay platform. For more information about the trial and on how to register, please see <http://emergencysms.org.uk/>
- 8.53 We are working with the ACOD to help ensure that potential users of the service are aware of the trial.

Further comments on how we apply our duties and powers

- 8.54 Broadband Britain.co.uk, a group of broadband users, suggested it was worth considering whether the Disability Discrimination Act ('the DDA') offered possibilities

⁹³ 112 is not currently included within the scope of the service.

to introduce any new services and business models. There was a separate query as to whether Ofcom's requirements exceed the scope of the DDA.

- 8.55 Service providers are required under the DDA to make 'reasonable adjustments' to make their services accessible to disabled people. Only a court can rule on whether a particular adjustment is reasonable.
- 8.56 Ofcom is of the view that its implementation of the Universal Service Order through the USO and General Conditions is an essential measure in ensuring that the interests of disabled users are satisfied. We consider that, in relation to those services covered by the USO and General Conditions, the obligations placed on providers are sufficient to meet the requirements of the DDA.
- 8.57 In those areas in which Ofcom has not, or does not have power to, impose specific obligations (such as the availability of end user equipment for disabled users), it is a matter for providers to ensure that they meet the requirements of the DDA.

Next steps

- 8.58 Our consultation on TV Access Services is open until 12 November 2009, we expect to publish a statement on the outcome of our review in early 2010.
- 8.59 We are considering the future of text relay services as part of our review of the USO, discussed further in section 9. Our USO Consultation, to be published later this year, will consider the social value of the various USO elements, including text relay.
- 8.60 We have also embarked on two further activities since the publication of our Consultation:
- We have commissioned research to explore how people with a mobility or dexterity impairment use communications services and to identify barriers that they experience. This work follows previous research into the communications experience of people with hearing impairments, visual impairments and learning difficulties, and will enable us to understand similarities and differences. The research will be completed later this year and published as part of the Consumer Experience.
 - We are engaging with the Customer Contact Association⁹⁴ with regard to good practice for call centre staff in handling queries from people with disabilities. As explained in consultation, we are frequently advised of problems that people with disabilities have in dealing with call centres. While we have no specific powers in this area, we are keen to encourage good practice.
- 8.61 We would also like to highlight two pieces of research carried out by our technology team, which will be of interest for stakeholders concerned about the needs of disabled users:
- We have commissioned research to explore the role communications technologies may have in providing assisted living services to older and disabled people in the coming ten to twenty years. This study will develop scenarios based on the future services required to promote social and economic inclusion, investigate drivers for (or barriers to) change and identify the key technological

⁹⁴ The Customer Contact Association (CCA) is a global professional body for contact centres (<http://www.cca-global.com/>)

developments required. Such work will provide us with an early insight into potential impacts on the UK's communications infrastructure.

- Another strand of research which has been commissioned is a study into the potential benefits of speech recognition technology in assisting people with hearing impairments to make use of free or low-cost Voice over IP (VoIP) communications. Typically these are used by friends and family and it may be that the technology could enable a service which is complementary to the existing provision. Such a service could, for example, offer a degree of privacy which operator-based services cannot.

8.62 We expect to publish our VoIP study in early 2010, our study on assisted living in spring 2010.

Section 9

The existing implementation of the Universal Service Obligation

Why we consider the existing USO a priority for our work

- 9.1 Universal service provides a basic safety net that ensures that citizens can access voice telephony services. Ofcom is responsible for its implementation via the USO which is determined by the Universal Service Order.
- 9.2 We have periodically reviewed the way in which we implement the Universal Service Order together with the costs that USO implies for BT and Kingston Communications (KCOM).
- 9.3 Since the most recent review of USO implementation, in 2005/6, there have been significant changes in the telecommunications market and the way in which citizens and consumers utilise services provided under USO.
- 9.4 We therefore believe that it is timely to look again at the existing USO at this point and assess whether its current implementation is still appropriate. Since the Consultation was published, we have commenced work on our review of the USO implementation and intend to publish a consultation document before the end of the year.

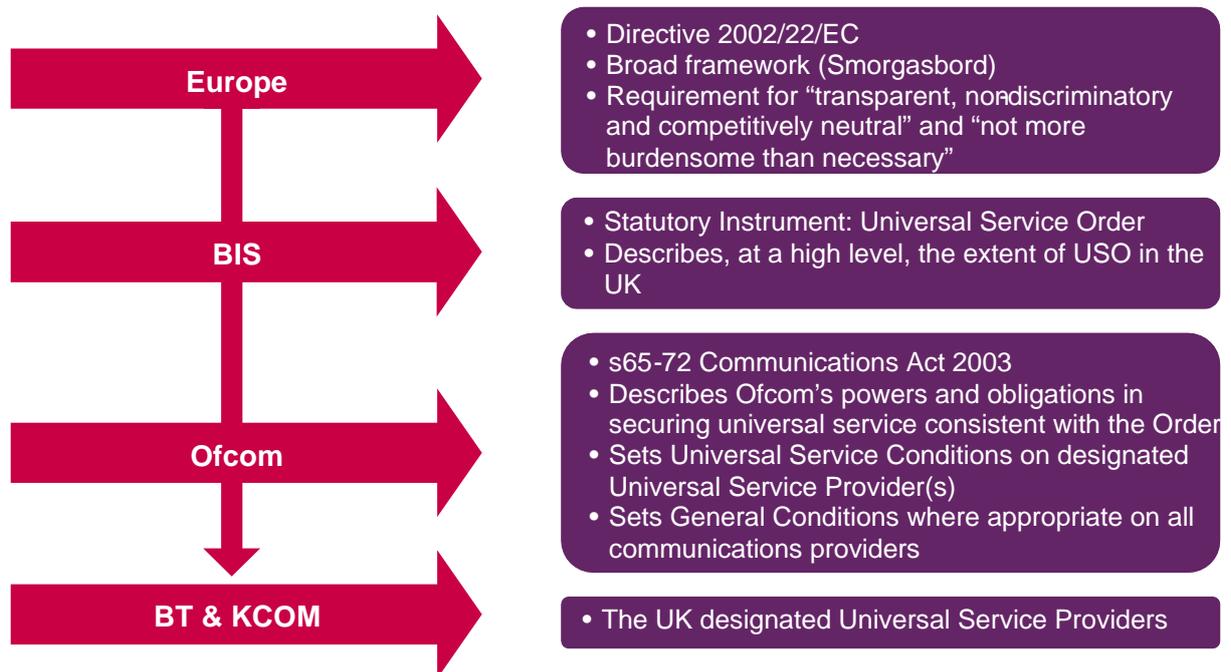
Our underlying statutory duties and powers

- 9.5 The broad framework for universal service requirements is set at EU level through the European Commission's Universal Service Directive. This framework is then transposed into national legislation by the individual member states in accordance with their specific needs. In the UK, the Secretary of State for Business, Innovation and Skills is responsible for determining the services that are subject to a Universal Service Obligation in the Universal Service Order.⁹⁵
- 9.6 These requirements were most recently set in 2003.
- 9.7 It is then Ofcom's responsibility to implement the Order by the establishment of the obligations for each service set out in the Order. To do so we have designated BT and Kingston Communication as Universal Service Providers (USPs), who have to provide a number of services at uniform and affordable prices. In certain circumstances, where we consider it appropriate to secure the objectives of the Universal Service Order, we have imposed obligations both on USPs and General Conditions on communications providers more generally in order to ensure that services are provided in the most effective manner.
- 9.8 Although not part of the USO, Ofcom has imposed additional obligations on communications providers through the General Conditions in order to ensure that the objectives of the Universal Service Order are met effectively. Those conditions include conditions which require, for example, each communications provider to offer text relay services to its customers, to offer directories and directory enquiry services, to provide itemised billing.

⁹⁵ Under section 65 of the Act

9.9 The diagram below illustrates our role with regards to the USO.

Figure 4: Our role with regards to the Universal Service Obligation



9.10 The main USO requirements today include the provision of the following:

- A fixed voice telephony connection upon reasonable request.⁹⁶ The line must be capable of supporting a dial up modem to provide narrowband internet access.
- A social tariff, providing a discounted fixed line product for consumers on low incomes who might otherwise have difficulty affording service.
- Provision of a network of public pay telephones which meet the reasonable needs of consumers in terms of quality, quantity and geographic spread and which provide for free access to emergency service calls on 112 and 999.
- Equivalent access to fixed voice telephony services for people with a disability. This includes the provision of a text relay service by BT, access to directory information facilities, a priority service to repair faults, special bills designed for people who have eyesight difficulties or are blind, and call boxes that are easy to enter and use.
- Directory information and a directory enquiries service. The directory information should be updated every year and a service should be available to those using public payphones.
- Provision of universal service requirements on an unbundled basis and at an affordable price that is uniform throughout the UK, except where Ofcom determines there is a clear justification for not doing so.

9.11 The scope of the USO is currently defined by the Universal Service Order which in turn is constrained by the extent of the European Universal Service Directive. As the revised Universal Service Directive is not likely to become UK law before mid-2011,

⁹⁶ Where the cost of provision exceeds £3,400, the USPs may employ non-uniform pricing.

Ofcom's USO review will not therefore be considering the scope of the USO and whether or not additional services should be added.

- 9.12 The European Commission published a paper on the future scope of universal service in September 2008. Among the questions raised in the paper is the degree to which the scope of USO should be determined at a national, rather than pan-European, level, whether mobile telephony should be included within the scope of the USO and whether USO should be extended to cover broadband.
- 9.13 The debate about the future shape of the USO at the European level will continue into 2010. The Commission could publish a further communication in the course of the coming year, which could in turn lead to legislative proposals to further amend the Universal Service Directive. Should the government then make changes to the UK's Universal Service Order, Ofcom will then consider what action it needs to take in order to ensure that the USO remains fit for purpose.

The objectives for our work and the citizen benefit we aim to achieve

- 9.14 We are conducting a review of the current USO implementation now so to determine whether the way in which services are offered and funded is appropriate.
- 9.15 We believe that reviewing our current implementation of the USO is important to ensure that it is as effective as possible, with focus on the services that generate the greatest overall benefits for citizens and consumers. As part of this evaluation we expect to look at the social benefits generated by the different elements of the obligations and consider whether the way in which the Order is currently implemented could be changed for the better.
- 9.16 We will also examine whether the USO constitutes an unfair burden on BT and KCOM and whether current funding arrangements continue to be appropriate

Our response to stakeholder comments

- 9.17 Few respondents commented on our review of the existing USO. Most of those who did, commented on the potential future role for broadband and mobile in universal service, funding issues, and on the needs of speech and hearing impaired users and the future of the text relay service.
- 9.18 Below we refer to comments on the scope of the USO and its funding. We discuss services for speech and hearing impaired users in detail in our section on services for disabled users.
- 9.19 Broadband Britain.co.uk stressed that the current USO debate should not focus on the existing requirements, but very explicitly looks at measures to make broadband a universal service. It encouraged us to take an active role in scoping universal service requirements and funding mechanisms for broadband and liaise with Government and industry stakeholders to resolve this question.
- 9.20 Intellect believes that the definition of universal service should be service-based "leaving technology solutions to industry". It encouraged us to communicate this, and to proactively prepare our "regulatory infrastructure" for the delivery of future universal service needs.
- 9.21 Determining which services should be universally available and how this should be funded is a matter of wider public policy. As outlined earlier in this section, the scope

of universal service is currently being reviewed at European level. Once the revised European Directive is agreed, the UK Government will need to transpose this (by mid-2011) and Ofcom will consider what action needs to be taken in relation to the USO.

- 9.22 In the meantime the UK Government has embarked on its initiative for a 2Mbit/s universal service commitment by industry as part of the Digital Britain process, as well as an initiative to address the 'Final Third' of households that are unlikely to be reached by private investment in 'super-fast broadband'.
- 9.23 BT believes that any new obligations should be shared across industry by both fixed and mobile operators. BT welcomed the emergency (999/112) mobile roaming initiative in this context and expresses support for the introduction of emergency SMS services. It highlights that lack of emergency access and inadequate mobile coverage is an important reason for rejections of removal of pay-phones.
- 9.24 Orange stressed that "the outcome must not be an obligation on mobile operators to subsidise the unprofitable parts of fixed operators."
- 9.25 A number of respondents highlight that in their view the USO should be technology neutral, and highlight the role mobile services could play in delivering the USO.
- 9.26 Scottish and Southern Energy propose wider industry involvement in the provision, funding and management of universal services, if this is supported by a transparent governance mechanism.
- 9.27 Our review of the USO implementation will take these points into account. We propose that the review will assess the financial and social costs and benefits of the USO and consider the merits of different funding and procurement alternatives. However, as mentioned above, the scope of the Universal Service Order itself is outside the scope of the review and will be decided at European and Governmental level.
- 9.28 We want to engage with and actively involve the industry and other stakeholders - such as consumer and disability organisations - as we take forward our review of the funding and provision of the USO. This engagement has already begun and will continue as we move forward with our consultation process.

Progress since the consultation document was published

- 9.29 Since we published the Consultation in March, we have commenced our work on the review of the existing USO. This background work means we now expect to publish our first consultation document in the last quarter of this year.
- 9.30 Our first consultation will set out a high level framework for progressing the review, including approaches to assessing financial and social costs and benefits and long term alternatives for funding and procurement.
- 9.31 We expect our first consultation to set out our proposed approach to three main strands of work: an assessment of the costs of USO, an assessment of the benefit of USO to society and an outline of the alternative arrangements that could be made for the funding and procurement of services provided under USO.
- 9.32 As well as taking into account responses to the consultation, over the following months we expect to work closely with a broad range of industry, consumer and

other stakeholders to further test our approach to the review and understand the views of those who are affected by it.

Next steps

- 9.33 We expect to publish the first consultation of our review of the existing USO later this year, and would expect a second consultation to follow in 2010, setting out evidence based proposals on changes that seem appropriate.
- 9.34 Should changes be made to the UK's Universal Service Order as a result of the European level review, Ofcom will consider whether any changes are required to the existing USO.

Section 10

Media Literacy

Why we regard Media Literacy as an Access and Inclusion priority

- 10.1 Media Literacy is an important strand of our Access and Inclusion work. Ofcom's work to promote media literacy is intended:
- to give people the opportunity and motivation to develop competence in, and confidence to, participate in communications technology and digital society; and
 - to inform and empower people to manage their own media activity (both consumption and creation).
- 10.2 Lack of interest, skills or confidence to access and use digital communications services can be key barriers to the take-up and effective use of these services.
- 10.3 We stated in our Consultation that we regard Media Literacy as a priority for our Access and Inclusion work. The launch of the Digital Participation initiative has not changed this.
- 10.4 A number of stakeholders have asked us to explain the ongoing role our Media Literacy work would play, given the Government's Digital Participation initiative and our role in the Consortium.
- 10.5 Digital Participation includes a range of activities from Digital Inclusion, i.e. initiatives to encourage the take-up of services, Digital Life Skills, i.e. the ability to use these services and Digital Media Literacy i.e. the ability to use, understand and create digital communications.
- 10.6 Ofcom's work in Digital Participation is a specific task which will draw on our continuing media literacy work – both research and partnerships.
- 10.7 In 2010/11 the Consortium's main focus will be specifically on projects aimed at encouraging access and inclusion. Work concerning these areas, in addition to that relating to people's evaluation and management of content, will continue in our media literacy workstream. We also hope that working in close collaboration with the Consortium will enable us to extend our partnership work to promote Media Literacy. The work of the Consortium is discussed in detail in section 6.

Our underlying statutory duties and powers

- 10.8 Ofcom has a duty under section 11 of the Act to take steps to bring about a better public understanding of the nature of content, how it is selected and made available and how it can be controlled and regulated. These aspects are typically referred to as 'Media Literacy' and Ofcom has been taking active steps to ensure that citizens are able to use, understand and create media and communications.
- 10.9 Under section 14(6)(a) of the Act we have a duty to make arrangements for the carrying out of research into the matters mentioned in section 11(1).

10.10 The Act also states that Ofcom must also have regard, in performing those duties, to such of the following as appear to them to be relevant in the circumstances:⁹⁷

- Children;
- disabled people;
- the elderly;
- those on low incomes;
- ethnic communities; and
- persons living in rural and urban areas.

10.11 It should be noted that the duty to promote media literacy, placed on Ofcom by the Act, includes the promotion of media literacy relating to content made available on the fixed and mobile internet.⁹⁸

10.12 In 2007 we decided to review our media literacy activity because the media environment around us is changing rapidly and there had been significant developments since we began our work in 2004. We decided that it was time to take stock and consider where and how we need to enhance our work to promote media literacy in this changing landscape.

10.13 We sought feedback from the Content Board, Communications Consumer Panel, the Advisory Committees for the Nations and ACOD. We also sought the views of a range of key stakeholders including Government, industry, academic and voluntary sector stakeholders. This Review of Ofcom's Media Literacy programme was published in December 2008.⁹⁹

10.14 Having taken account of our statutory duties in section 11 of the Act, Ofcom's key priorities in respect of the promotion of media literacy are:

- Content management – providing people with the tools to manage content;
- Content information – promoting the provision of information to help people manage content; and
- Critical awareness – promoting a better understanding of the nature and context of media messages.

10.15 We do not have specific powers to impose media literacy requirements on stakeholders, however, Ofcom's approach has been to provide leadership and to influence stakeholders - including policy makers, education, industry and the voluntary sector - to promote media literacy for all members of society.

10.16 We have put media literacy clearly on the agenda of all stakeholders. Ofcom is an evidence-based regulator, and we use our portfolio of research to define priorities for

⁹⁷ Section 3(4)

⁹⁸ 'Electronic media distributed by means of an electronic communications network to members of the public or of a section of the public'. Communications Act 2003 s11(2)(b)

⁹⁹ http://www.ofcom.org.uk/advice/media_literacy/review0408/reviewml0408.pdf

action, both for Ofcom and for our stakeholders. Research helps us identify the skills gaps and issues, directs our activity and measures our progress towards achieving our goals. We provide leadership and stimulate debate with stakeholders, and speak at conferences and events throughout the UK, in Europe and beyond. We also add value to existing media literacy activity, stimulate new work, and promote and direct people to advice and guidance on new communications technologies. Ofcom has established effective partnerships with key stakeholders in government, education, the voluntary sector and the industries. Ofcom uses part of its website and e-bulletins to direct people to relevant information on media literacy issues.

- 10.17 Media Literacy is also the one area of our Access and Inclusion work in which we receive funding directly from the Government. This enables us to support a number of initiatives.

The objectives for our work and the citizen benefit we aim to achieve

- 10.18 Findings from the first wave of the 2009 Adult Media Literacy Tracker show that measures of use, understanding, trust and confidence vary across demographic groups. Take-up of the internet is lower among adults aged 55-64 (63 per cent vs. 73 per cent of all adults) and adults aged 65+ (41 per cent vs. 73 per cent of all adults). Take-up of the internet at home also remains lower among those in DE socio-economic groups (51 per cent vs. 73 per cent of all adults). While those aged 16-24 are more likely than all adults to make use of a variety of devices to access the internet, download or watch TV programmes or films online and generally make a broader use of the internet, they show lower than average levels of understanding of BBC funding and the regulation of content.
- 10.19 There is also evidence from the first wave of the 2009 Children's Media Literacy Tracker that further work is required in relation to parental awareness and use of content management tools. Approximately two-thirds of parents in multi channel television households say they have not set controls to restrict their children's access to television channels. Findings suggest over half of parents whose child uses the internet at home have not loaded internet controls or filtering to limit the child's access to certain types of websites. There has been a decline in the incidence of internet controls or filtering software since 2008 among parents of 12-15s (40 per cent vs. 46 per cent).
- 10.20 We are therefore paying particular attention to the following gaps identified by the Audits:
- older people – with regards to use and understanding;
 - younger people - with regards to understanding (critical awareness); and
 - parents and carers - with regards to use (content management strategies and tools e.g. filters and PINs).

Our response to stakeholder comments

- 10.21 The great majority of respondents to our consultation saw our work to promote Media Literacy as positive. Consumer Focus believed that our co-ordination and enforcement role in this area should be strengthened.
- 10.22 Orange stresses that "Government, regulators and industry have a strong mutual interest in increasing levels of media literacy". It points that industry players have a

strong interest in offering a positive experience to consumers, and that industry-led Media Literacy initiatives may therefore be most effective.

- 10.23 A number of stakeholders such as the BBC, the British Standards Institute, Scottish Screen, Orange, Vodafone and the Mobile Broadband Group pointed out their own initiatives to ensure that there are safe environments online, and that parents receive the necessary information and tools to protect their children.
- 10.24 With our support, the Broadband Stakeholder Group and the UK's top broadcasters and content providers, developed a set of common principles¹⁰⁰ for providing viewers with information about content which may contain potentially harmful or offensive material in order to help people make an informed choice about what they and their children watch.
- 10.25 We look forward to continuing to work with these and other stakeholders as part of our Media Literacy work and through the Consortium.
- 10.26 A number of stakeholders stressed the importance of content as a driver of interest in the internet. They also highlighted the importance of skills and confidence as enablers of take-up and effective use of content and services.
- 10.27 We understand the importance of content as a motivator for people and as set out in paragraph 10.33 below, we have worked with stakeholders in developing Media Literacy Partnerships to ensure that users are have access to the necessary tools, strategies and information to manage the content they receive, and have the critical awareness to put this content into context.
- 10.28 PhoneAbility felt that any Media Literacy campaign needed to take care to advise people about the potential issues associated with going online such as fraud, intrusion or security issues, offensive content and cost.
- 10.29 We are sponsors of the Get Safe Online initiative which is a trusted source of information for people on how to protect their computers and themselves from fraud and identity theft.
- 10.30 Ofcom is represented on the Executive Board and all four working groups of UK Council for Child Internet Safety. We also support the work of the Child Exploitation and Online Protection Centre (CEOP) and the Internet Watch Foundation (IWF). One stakeholder believed Media Literacy needs to be integrated in school curriculum changes. It is not within our area of competence to suggest changes to the school curriculum or within our gift to bring about changes to it. However, we hope that the organisations who look at this question will find our Media Literacy research useful in forming their views and preparing their decisions.

Progress since the consultation document was published

Media Literacy Partnerships

- 10.31 Building partnerships and supporting existing partners forms a central part of fulfilling our Media Literacy duties. We work with stakeholders including policy makers, education, industry and the voluntary sector.

¹⁰⁰ <http://www.audiovisualcontent.org/>

- 10.32 We are pleased that, jointly with our partners Mencap,¹⁰¹ we have developed a Media Literacy education resource (Switch On!) for practitioners working with people with learning difficulties and disabilities. We are delighted that the National Open College Network (NOCN) Media Literacy Entry level qualifications have been approved and were made available in August. This is the first media literacy qualification for people with learning difficulties and disabilities.
- 10.33 The qualifications have been designed to provide an introduction to, and a basic understanding of the media with a view to encouraging individuals to actively engage with, question and interpret the information and images presented to them through a range of media formats. These qualifications are of particular importance to those who are major users of mass media products, many of whom are from vulnerable groups in society.
- 10.34 In partnership with the Home Office and industry, we have developed a British Standards Institution (BSI) Standard for internet content control software.¹⁰² The standard was launched by the Home Secretary in April 2008. The UK Council for Child Internet Safety (UKCCIS) is now actively taking the project forward and discussions with industry continue. In addition to being represented on the Executive Board of UKCCIS, we are active members of the four working groups and the Expert Research Panel.
- 10.35 We have continued to organise meetings and events for the Associate Parliamentary Media Literacy Group (APMLG) which is chaired by Danny Alexander MP. Topics discussed this year have included Citizens' Digital Participation, Teaching Media Literacy in Schools and Digital Participation. The Group has launched its new dedicated web presence and has attracted a number of new members.
- 10.36 We have also provided financial support for a range of media literacy initiatives including:
- UK online centres (<http://www.ukonlinecentres.com/>) – 'Older learner community champions' project;
 - NIACE (<http://www.niace.org.uk/>) – Adult Learners' Week and TV Clubs pilot project;
 - Get Safe Online (<http://www.getsafeonline.org/>) – ongoing campaign;
 - Community Media Association (<http://www.commedia.org.uk/>) – Your Tools, Your Media project;
 - Voice of the Listener and Viewer (<http://www.vlv.org.uk/>) – Media Literacy Conference; and
 - Ofcom Scotland's eDemocracy, Access and Inclusion event which debated how to address the 'gaps' in availability, take-up and use and the importance of digital services to democracy in Scotland;
 - Cedar Foundation - a pilot project in Northern Ireland - in partnership with Business in the Community, working with residents from the Cedar

¹⁰¹ www.mencap.org.uk

¹⁰² Internet safety – Access control systems for the protection of children online (PAS74:2008).

Foundation (a local charity who work with disabled people, <http://www.cedar-foundation.org/>) to help them develop their online skills; and

- Wales Media Literacy Network (<http://walesmedialiteracy.org.uk/>), in partnership with the RTS and supported by Leighton Andrews AM Minister for Digital Inclusion, hosted a debate at the National Eisteddfod for Wales on the use of new media technologies amongst young people in the Welsh language.

- 10.37 In order to promote media literacy across the UK, we have developed active Media Literacy networks in Scotland, Northern Ireland and Wales. These networks develop and deliver a range of activities and events. Media Literacy Research
- 10.38 Since the publication of our Consultation, we have published a significant range of research that we believe will support the work of the Consortium as well as further initiatives to promote the use of digital communications services and media literacy.
- 10.39 Between April and June we published a new short series of reports entitled Digital Lifestyles, analysing data about people's attitudes and behaviours relating to communications technologies and identified five segments, based on the relationship people have with media devices. The specific reports address the media literacy skills of adults aged over 60, young adults 16-24, parents of children under 16.¹⁰³
- 10.40 The reports aim to support people working in this area to develop and promote media literacy, as they are designed to give an accessible overview of media literacy among these specific groups.
- 10.41 In June, we published an 'Audit of learning-related media literacy policy development'.¹⁰⁴ This report was our first joint commission with the Department for Children, Schools and Families and explored how the promotion of media literacy stretches across a range of public policy agendas.
- 10.42 In October we published interim reports of 2009 data about UK children's and adults' media literacy¹⁰⁵ – both provide trends over time. In September we published new research into "Children's and young people's access to online content on mobile devices, games consoles and portable media players."¹⁰⁶ We have also produced four guides for parents and carers on protecting children in a digital world (video and pdf available),¹⁰⁷ how to use parental controls on mobile phones,¹⁰⁸ games consoles and portable media players¹⁰⁹ and, if they need to, how to report inappropriate content and how to help keep children safe when using location based services.¹¹⁰

¹⁰³ Within the three segments there are some people who do have access to the internet at home. However, they do not necessarily use this personally, or have a narrower breadth of use than the general UK population.

¹⁰⁴ http://www.ofcom.org.uk/advice/media_literacy/medlitpub/medlitpubrss/ml_policy_development/

¹⁰⁵ http://www.ofcom.org.uk/advice/media_literacy/medlitpub/medlitpubrss/uk_childrens_ml/

¹⁰⁶ http://www.ofcom.org.uk/advice/media_literacy/medlitpub/medlitpubrss/online_access.pdf

¹⁰⁷ 'Protecting your children in a digital world' (<http://www.ofcom.org.uk/consumer/2009/10/managing-your-media-protecting-your-children-in-a-digital-world/>).

¹⁰⁸ 'Parental controls for mobile phones' (<http://www.ofcom.org.uk/files/2009/09/mobiles.pdf>).

¹⁰⁹ 'Parental controls for games consoles and portable media players' (<http://www.ofcom.org.uk/files/2009/09/consoles.pdf>).

¹¹⁰ 'A guide for parents and carers on mobile location based services' (<http://www.ofcom.org.uk/files/2009/10/location.pdf>).

Box 2: Ofcom Media Literacy research March-September 2009¹¹¹

UK children's media literacy - 2009 interim report, 06 October 09

Children's and young people's access to online content on mobile devices, games consoles and portable media players, 03 September 09

Audit of learning-related media literacy policy development, June 2009

Citizens' Digital Participation, Research Report, 20 March 09

Digital Lifestyles Series:

Digital Lifestyles: parents of children under 16, 11 June 09

Digital Lifestyles: Young adults aged 16-24, 14 May 09

Digital Lifestyles: Adults aged 60 and over , 14 May 09

Media Literacy Audit - Digital Lifestyles: Hesitants, Resistors and Economisers, Published 01 April 09

Source: http://www.ofcom.org.uk/advice/media_literacy/medlitpub/medlitpubrss/

- 10.43 As the promotion of media literacy moves up the policy agenda, there is a growing need to maximise efforts to understand and share learning about emerging issues at European and international levels.
- 10.44 We have been developing the International Media Literacy Research Forum (the Forum) to provide a platform to improve understanding of the emerging issues, to promote innovative methodologies and to raise media literacy up the agenda of policy-making bodies across the world. The Forum is intended to provide a platform for professional researchers and practitioners from across the world to share knowledge and expertise in the field of media literacy research. The Forum is currently supported by leading organisations in the United States, Australia, Canada, Europe, Ireland, New Zealand and the UK, with broader networks to follow. A website to support the work of the Forum and enable greater online collaboration among its Members is under development.
- 10.45 We have continued to publish our monthly Media Literacy e-bulletin to approximately 1500 stakeholders and have helped a wide range of organisations promote their media literacy work including the Child Exploitation and Online Protection Centre,¹¹² Becta, the BBC, Voice of the Listener and Viewer,¹¹³ and the Internet Watch

¹¹¹ The reports can be accessed at:

http://www.ofcom.org.uk/advice/media_literacy/medlitpub/medlitpubrss/

¹¹² The Child Exploitation and Online Protection (CEOP) Centre "is part of UK law enforcement and as such can apply the full range of policing powers in tackling the sexual abuse of children" (www.ceop.gov.uk).

¹¹³ Voice of the Listener and Viewer "represents the citizen and consumer interests in broadcasting, and speaks for listeners and viewers on the full range of broadcasting issues" (<http://www.vlv.org.uk/>).

Foundation,¹¹⁴ as well as the organisations that we provide financial support to through our funding from the DCMS.

Next steps

10.46 We have a continuing and comprehensive programme of media literacy research. Our upcoming projects include:

- **The Evaluation of Internet content – publication planned for autumn 2009.** The purpose of this exploratory qualitative research is to understand in more depth the strategies used by people to assess the veracity, trustworthiness, independence and balance of online content and services; and people's awareness and understanding of regulation in both the broadcasting and online environments, exploring concepts of personal responsibility, self regulation, co-regulation and statutory regulation in the online environment.
- **Media Lives** – this is a longitudinal qualitative study examining people's use of media and attitudes towards it. It provides a rich picture which allows us to understand developments in people's media literacy skills over time.
- **Wave 2 of Children's Tracker and Wave 2 of Adult Tracker** – publication of reports planned for spring 2010 based on two waves of research. The key objectives of this research are: to provide a rich picture of the different elements of media literacy across the key platforms of television, radio, the internet and mobile phones; and to identify emerging issues and skills gaps that will help to target both Ofcom's and stakeholders' resources for the promotion of media literacy.

10.47 We will continue to work with, and support a range of partners, including education providers, UK online centres, libraries and other support networks, to ensure the promotion of media literacy among the UK population. Our support of the National networks will continue. We are planning a new season of APMLG events and will launch the website to support the work of the International Media Literacy Research Forum in the autumn.

10.48 We also believe that we should play an ongoing role in promoting and sharing best practice in the promotion of media literacy across Europe and beyond by sharing information about our research and our work. The recent European Commission Recommendations on Media Literacy and the Audio Visual Media Service Directive position media literacy as an importance precursor to effective co-regulation of the media and telecommunications industry.

¹¹⁴ The Internet Watch Foundation (IWF) is run by UK internet industry "to provide the UK internet 'Hotline' [...] to report potentially illegal online content within our remit and to be the 'notice and take-down' body for this content" (www.iwf.org.uk).

Section 11

Emergency (999/112) mobile roaming

Progress since the consultation and benefits to citizens and consumers

- 11.1 We are pleased to announce that Emergency Mobile Roaming was launched on 14 October after a successful trial. This is earlier than the end of 2009 launch we had originally anticipated.
- 11.2 Mobile phone users now have the ability to call the emergency services (999 and 112) from another network if one's own network is unavailable and there is another network provider in the area with coverage. The phone will automatically switch over to whichever network operator has the best coverage in that area.
- 11.3 The successful launch of emergency mobile roaming is the result of a joint effort of the mobile network operators, emergency authorities and the fixed operators who act as call handling agents and Ofcom.¹¹⁵
- 11.4 We also owe this success to our stakeholders in the Nations and Regions, in particular our Advisory Committee for Wales, who have tirelessly reminded us of the importance of this service, and challenged the rate of our progress.
- 11.5 We believe that it will bring UK citizens significant benefits by extending the accessibility of the emergency services. We are aware it has long been high on the agenda of our stakeholders.
- 11.6 It is worth noting though that emergency mobile roaming in its current form has limitations: location information is less accurate and it is not possible to make a return call. Callers should therefore be aware that calling the emergency services from a fixed line phone or a mobile phone the network it is registered with remains preferable. Consumers must also ensure that the mobile handset from which they wish to make the emergency call contains a SIM card.
- 11.7 Ofcom considered two ways of introducing the emergency roaming service, access via Limited Service State (LSS); and access via national roaming.
- 11.8 We decided to develop a technical solution based on LSS. LSS was chosen on the basis of cost and speed of implementation.
- 11.9 A national roaming solution is likely to be significantly more expensive for mobile operators to introduce and would take longer to implement. In addition handsets become 'locked' onto the roamed network as, to preserve the battery life, network scanning only takes place every 30 minutes or so. This could lead to a need for a significant 'clearing' mechanism between operators, to identify non-emergency calls inadvertently made by consumers while on the roamed network.
- 11.10 LSS is limited in the sense that less call and caller information is available. However, it is the easier and less costly of the two solutions to introduce. The emergency authorities supported this solution as they were keen for early implementation.

¹¹⁵ We have regulatory oversight of the operation of emergency calls up to the point where the call is handed over to the emergency authority.

Our statutory duties and powers

- 11.11 One of Ofcom's primary duties under the Act is to further the interests of citizens in relation to communications markets and to secure the availability of a wide range of electronic communication services throughout the UK.¹¹⁶ In carrying out this duty, Ofcom is required to have regard to the different interests of persons in the United Kingdom and, in particular, of those living in rural and in urban areas.¹¹⁷
- 11.12 Ofcom therefore included emergency roaming as a priority area into our work programme in March, in particular due to mobile coverage issues for people living in rural areas.

Stakeholders responses

- 11.13 The Consultation asked stakeholders for their views on whether availability issues in relation to the ability to call the emergency service from another network if one's own network is unavailable should be one of our immediate access priorities.
- 11.14 We are pleased that the majority of respondents agreed that emergency roaming should be a priority for Ofcom in light of the clear benefits it will bring to citizens, and therefore continued to drive our work forward as planned.
- 11.15 In particular our stakeholders in Scotland and Wales felt that the introduction of emergency mobile roaming would bring significant benefits for citizens and consumers.
- 11.16 BT acknowledged the LSS solution chosen by us was less complex and could be implemented relatively quickly. However, it still felt that full roaming agreements could be set up to enable users to make emergency calls as though they were calling from their own network. BT believes that this would afford additional security against nuisance calling and also allow for the caller to be contacted back or traced in an emergency.
- 11.17 TAG also agreed that emergency mobile roaming was important, but, like BT, they felt that additional functionality was required i.e. should not be limited to voice calls, it should include text and video as well.
- 11.18 Consumer Focus also supported emergency roaming but noted that emergency calls could only be made where coverage is available on at least one network. Consumer Focus noted that there are still parts of the UK which have no mobile network coverage at all. This view was echoed by Citizens Advice who supported the proposal but felt that this work should be accompanied by efforts to remedy the gaps in mobile coverage.
- 11.19 Communications providers who responded were supportive but warned of the policy and technical issues that needed to be taken into account.
- 11.20 We are aware that the current solution is not perfect, but it is in line with solutions available in other European countries and consider it to be the best solution achievable at this point in time. The network operators have reported that there have been approximately 650 genuine emergency calls using the service during the two weeks of trial, when the service had only been partially rolled out across the UK's

¹¹⁶ Section 3(2)(b)

¹¹⁷ Section 3(4)(l)

mobile networks. This reassures us that the rapid introduction of Emergency Mobile Roaming was necessary and is already delivering benefits to citizens and consumers.

- 11.21 The question of the potential to introduce full roaming for emergency services to enable identification of the user and return calls, and also the question of total mobile not-spots are linked to a wider discussion on mobile coverage.

Next steps

- 11.22 In response to TAG's comments about extending the service beyond voice calls we are pleased to refer to the progress that has been made by the 999 Liaison Committee in enabling emergency access through SMS messaging.¹¹⁸
- 11.23 Emergency access through text messaging (SMS) is intended to provide a safety net for users with hearing or speech impairments who would otherwise find it difficult to make a conventional 999 call. Users who wish to access the service are required to pre-register here: <http://emergencysms.org.uk/>.
- 11.24 Ofcom recognises that for emergency roaming to work there must be at least one available network in the area. On 8 July 2009, Ofcom published 'Mostly Mobile – Ofcom's mobile sector assessment second consultation'. Here we confirmed our commitment to look more closely at the nature, and reasons for persistent 2G 'not spots' and work where appropriate to facilitate better coverage.¹¹⁹

¹¹⁸ The 999 Liaison Committee brings together the emergency services (police, fire, ambulance and coastguard), the call handling agents (BT, Cable & Wireless and Global Crossing), the public network operators (fixed and mobile) and Ofcom. Other groups such as RNID are co-opted to give specialist advice. It is convened by the Department for Communities and Local Government.

¹¹⁹ The consultation is available at <http://www.ofcom.org.uk/consult/condocs/msa/>

Section 12

Emerging priorities

- 12.1 In our Consultation we asked stakeholders whether they felt that we had not put sufficient emphasis on other services in our prioritisation of Access and Inclusion issues.

Question 5.2: Are there other gaps in the availability of key services that you believe are particularly critical for consumers and citizens? Please support with evidence where possible.

- 12.2 Specifically, we pointed towards mobile voice and data services and digital radio as areas that do raise some Access and Inclusion questions, but that we did not regard as key priorities for us at this point.
- 12.3 However, in context of the Digital Britain White Paper and the stakeholder feedback we receive, these are areas we keep a close eye on.
- 12.4 As result of our Mobile Sector Assessment, we have also embarked on research to better understand the causes of mobile not-spots.
- 12.5 In this section we briefly discuss our current view and work on mobile voice and data services and digital radio, as well as stakeholder views. We have already discussed stakeholder comments on super-fast broadband in our section on broadband availability. Other services were not highlighted by stakeholders as requiring particular attention.

Mobile voice and data services

Our role and duties

- 12.6 We have the duty to secure availability of a wide range of electronic communications services throughout UK¹²⁰ and have regard to desirability of encouraging availability of high speed data transfer services.¹²¹ We also set and enforced the coverage obligation of 80 per cent of population contained in the 3G licences.
- 12.7 Mobile networks are an important delivery platform for voice services and text messaging and are becoming of growing importance for the delivery of broadband access.
- 12.8 Mobility is valued highly and regarded as increasingly essential by both individuals and businesses. We note, however, that there is now only a small proportion of households without access to mobile phones (9 per cent) and 86 per cent of people personally own a mobile phone. Involuntary exclusion from mobile services is very low.
- 12.9 Mobile access can be particularly important for accessing the emergency services, when fixed line telephony (and the payphone network) may sometimes offer poor

¹²⁰ Section 3(1)(b)

¹²¹ Section 3(4)(e)

substitutes. As outlined in section 11, an emergency mobile roaming service is now available, and access to emergency services for SMS is being trialled.

12.10 We looked at the issue of mobile coverage in Phase 2 of our Mobile Sector Assessment, published in July,¹²² and it emerged as an issue that required further attention. We noted that:

- For 3G coverage there is still a noticeable difference between rural and urban areas, and also between different parts of the UK. Coverage is a particular issue in the devolved nation.
- 2G coverage is unlikely to be extended further than today on commercial grounds, leaving a number of ‘not-spots’ across the UK.

12.11 We also noted the limitations of the data we currently have available on mobile coverage. This data has been used to produce high-level aggregate maps. It does not provide insights into network quality or causes of problems on the ground.

Stakeholder responses

12.12 Many stakeholders supported our selection of priorities for Access and Inclusion. However, many felt that we should not lose sight of mobile services. Indeed some asked us to reconsider the level of priority we give to mobile. The particular issue frequently pointed out was network coverage.

12.13 The Communications Consumer Panel (the Panel) felt we should put greater emphasis on mobile coverage. It argued that:

“[T]here is an unacceptable gap between official data, according to which 2G coverage is near universal, and the reality experienced by consumers, which is that there are a great many not-spots and areas where the quality of coverage is poor.”

12.14 The Panel has underpinned its view with research published in October, in which 33 per cent of individual users and 34 per cent of small businesses stated that they regularly experience problems with mobile coverage.¹²³

12.15 The Welsh Assembly Government believes that the mobile coverage discussion should move from 2G to a focus on 3G services.

12.16 Mobile operators, on the other hand, felt that regulation of mobile coverage is not required. On the contrary, they highlighted that they already play an important role in delivering services to a large proportion of the population and might be able to play a further role in delivering the Government’s proposed USC. Vodafone felt that where coverage is currently not commercially viable, local authorities could help assess demand and funding may be required. Another challenge may be the support from local communities (e.g. planning regulations, opposition against mast sites).

12.17 During our mobile sector assessment and beyond we have engaged with the Panel and other stakeholders to understand their concerns. Mobile not-spots have many,

¹²² Mostly Mobile - Ofcom’s mobile sector assessment - Second consultation, Section 8 – Coverage, <http://www.ofcom.org.uk/consult/condocs/msa/>

¹²³ The Communication Consumer Panel’s research can be found here: <http://www.communicationsconsumerpanel.org.uk/smartweb/research/mobile-coverage>

often highly location specific, causes. We are, therefore, embarking on work that will allow us to better understand what limits mobile coverage today.

- 12.18 The Government has also announced the goal to make “progress towards universal coverage in 3G and Next Generation Mobile” and that it will be addressing mobile broadband coverage as part of the negotiations of the Independent Spectrum Brokers’ negotiations with the industry.¹²⁴

Progress and next steps

- 12.19 To address persistent 2G not-spots (or ‘complete not-spots’) we intend to develop a facilitation role and explore how we might encourage creative solutions. For example, we intend to work, where we can, with mobile operators and with public bodies in the Nations, regions and localities to bring together relevant expertise as they consider any initiatives to resolve not-spots in their areas (as we have done previously with local broadband initiatives).
- 12.20 To help us to do this, we are also about to embark on research which will examine the causes of persistent not-spots and scope for any solutions. We are doing this by investigating a number of case study locations in the UK.
- 12.21 We will also consider the issue of network quality for mobile services including mobile broadband, liaising with the mobile operators.
- 12.1 We provide links to mobile operators’ coverage checkers on our website (<http://www.ofcom.org.uk/consumer/2009/08/mobile-broadband-coverage-checker>).
- 12.2 The Government is also looking at mobile coverage and the potential of mobile to contribute to the broadband USC as part of its Digital Britain initiative and the work of the Independent Spectrum Broker.¹²⁵
- 12.3 We will be working closely with stakeholders on gaining a better understanding of not-spots and of network quality. We would encourage stakeholders to share their insights and research on questions such as the consumer and business perception of coverage, technical quality of coverage and reasons for not-spots.

Digital Radio

Our role and duties

- 12.4 With regards to radio we have the specific duty to under the Act to secure the availability of a wide range of TV and radio services.¹²⁶
- 12.5 The majority of radio use continues to be via analogue rather than digital radio platforms.¹²⁷ Availability of both platforms is near ubiquitous with availability of DAB digital radio at 90 per cent of the population.

¹²⁴ Digital Britain – Final Report, June 2009, Chapter 3a - A Competitive Digital Communications Infrastructure, see in particular paragraph 89ff pages 70ff, <http://www.culture.gov.uk/images/publications/digitalbritain-finalreport-jun09.pdf>

¹²⁵ The Digital Britain Final Report refers to mobile coverage in Chapter 3a – A Competitive Communications Infrastructure, paragraph 80ff, page 68ff (<http://www.culture.gov.uk/images/publications/digitalbritain-finalreport-jun09.pdf>). The Independent Spectrum Broker’s report (published on 13 May 2009) can be found here: http://www.culture.gov.uk/reference_library/publications/6147.aspx

¹²⁶ Section 3(2)(c)

- 12.6 Digital radio may well become more important in the future as it becomes more widely adopted. In its Digital Britain White Paper the Government proposed the transition of national and large local AM and FM radio services to digital by 2015. Only 'ultra-local' services, such as small local commercial stations and community radio will be available via analogue FM transmission.
- 12.7 The Government proposed that a Digital Radio Delivery Group be created to work to increase both availability and take-up. It is planned to consist of the radio industry and set manufacturers as well as consumer groups.¹²⁸
- 12.8 In its Digital Britain implementation plan published in August 2009, the Government also proposes to make a number of legislative changes to the licensing regime for radio to facilitate digital radio upgrade.¹²⁹

Stakeholder responses

- 12.9 Few stakeholders mentioned digital radio in their consultation responses.
- 12.10 The BBC highlighted its own contribution to the development of digital radio. It considers digital services important for the survival of radio as a medium but does not question our decision not to prioritise digital radio as an Access and Inclusion topic at this point.
- 12.11 Intellect believed that digital radio is important for participation in society.
- 12.12 One individual stakeholder pointed out problems with digital radio coverage.
- 12.13 RNIB reiterated that felt that the discussion of digital radio should take greater account of the needs of disabled users. It published research earlier this year which we quoted in our March consultation. This research suggested radio is more important to blind and partially sighted users than to sighted users.¹³⁰ It also highlighted accessibility of equipment as an issue. Ricability also pointed towards the lack of easy-to-use and affordable digital radio equipment as a barrier for some users.
- 12.14 The Student Radio Association sought clarification on the status of digital radio switchover, and urged us to ensure that the interests of student radio stations in the UK are given fair consideration. It felt we should make radio our next priority.

Progress, interaction with stakeholders and next steps

- 12.15 We remain of the view that Digital Radio is not an immediate access and inclusion priority, however, we take note of stakeholders' comments and will remain close to the Digital Britain process and liaise with the Digital Radio Delivery Group once it has been established.

¹²⁷ The Communications Market 2009 stated that approx one fifth of listener hours were delivered through a digital platform in Q1 2009 (The Communications Market Report, page 150, http://www.ofcom.org.uk/research/cm/cmr09/CMRMain_3.pdf).

¹²⁸ Digital Britain – Final Report, June 2009, Chapter 3b – Radio: Going Digital, paragraph 34, page 99, <http://www.culture.gov.uk/images/publications/digitalbritain-finalreport-jun09.pdf>

¹²⁹ http://www.culture.gov.uk/images/publications/DB_ImplementationPlanv6_Aug09.pdf

¹³⁰ Are you really listening? (i2 media research on behalf of RNIB, 2009), http://www.gold.ac.uk/media/i2_RNIB_AreYouReallyListening.pdf

- 12.16 Our licensing programme for DAB will lead to a significant expansion in both national and local digital radio services over the next three years. For example, the award of new local multiplexes over the last few years should significantly improve DAB coverage in Wales, particularly for the BBC's services, Radio Wales and Radio Cymru.
- 12.17 In July, Ofcom consulted on how regulation would change should legislative changes come about as a result of the Digital Britain process.¹³¹ In particular, the consultation sets out a three tier structure for local and national radio designed to ensure that sustaining the delivery of local content, increasing choice and diversity of radio services, and ensuring an economically robust commercial sector. This consultation closes on 23 October.

¹³¹ <http://www.ofcom.org.uk/consult/condocs/radio/>

Section 13

Next steps

Further progress updates and review of our priorities

- 13.1 We asked stakeholders in our consultation, how they saw Access and Inclusion priorities evolving in the future:

Question 8.1: Do you agree with the proposed priority areas? Are there any areas that should be ranked above these and why?

Question 8.2: Which areas might we focus on in future years and why?

- 13.2 As discussed in this statement, stakeholders broadly agreed with our existing priorities. They highlighted a number of areas, which they felt we should keep under review and consider as future priorities:
- Broadband availability, given the advent of super-fast broadband;
 - Mobile coverage;
 - The quality of Digital TV broadcasts;
 - Equipment usability; and
 - Services for disabled people in light of changes in the communications market.
- 13.3 David Hall system suggested that we conduct an annual review of our priorities.
- 13.4 While this statement closes our consultation process on Access and Inclusion, we will continue to provide regular updates on the progress of our work.
- 13.5 We will also engage with stakeholders on the development of our priorities, as our current work progresses and the market evolves.
- 13.6 We will report annually on the progress and impact of our Access and Inclusion work in the Consumer Experience Report.
- 13.7 The next edition of the Consumer Experience report, which is due to be published in December 2009, will contain a more detailed update on our ongoing priorities.
- 13.8 We provide stakeholders with the opportunity to comment on the evolution of our work programme and priorities through our Annual Plan. The planned publication date for our draft 2010/2011 Annual Plan for consultation is December 2009.

Our ongoing work

- 13.9 Since our Consultation, we have successfully completed the introduction of emergency mobile roaming in the UK through our joint initiative with the mobile operators, call handling agents and emergency authorities.

13.10 Our initiatives in all other priority areas for Access and Inclusion remain work in progress.

13.11 To facilitate stakeholders' engagement with our work we provide below a summary of our Access and Inclusion work programme.

Table 4: Summary of our Access and Inclusion work programme

Priority area	Next steps	Timing	Ofcom contact	
All	<ul style="list-style-type: none"> Consumer Experience Report 	December 2009	Rachel Wingfield	
	<ul style="list-style-type: none"> Draft Annual Plan 2010/2011 	December 2009	Bea Frank	
Broadband take-up and Digital Participation	<ul style="list-style-type: none"> Formal Consortium launch 	15 October 2009	Robin Blake	
	<ul style="list-style-type: none"> Next Consortium meeting 	1 December 2009		
	<ul style="list-style-type: none"> Publication of National Plan for Digital Inclusion 	Spring 2010		
Services for disabled people	<ul style="list-style-type: none"> 2009 Review of Television Access Services 	Consultation open until 12 November 2009 Publication of statement in early 2010	Stephanie Brook	
	<ul style="list-style-type: none"> Text relay: Publication of USO consultation 	Q3 2009/10		Ritu Manhas and Katie Hanson
	<ul style="list-style-type: none"> Publication of research on the use of communications services by people with mobility or dexterity impairment 	December 2009		Ritu Manhas and Katie Hanson
	<ul style="list-style-type: none"> Research into the future of communications technologies and their role in assisted living services 	Spring 2010		Gary Clemo
	<ul style="list-style-type: none"> Research into the potential benefits of speech recognition technology in assisting people with hearing impairments to make use of free or low-cost Voice over IP (VoIP) 	Early 2010		Mike Brown
The existing Universal Service Obligation	<ul style="list-style-type: none"> Publication of consultation 	Q3 2009/10	James Bullock	
Broadband availability	<ul style="list-style-type: none"> Next steps dependent on the Government's Digital Britain plans 		Steve Unger	

Priority area	Next steps	Timing	Ofcom contact
Media Literacy	<ul style="list-style-type: none"> UK Adults' Media Literacy: 2009 interim report Evaluation of Online Content and Services UK's Children's Media Literacy: 2009 final report UK Adults' Media Literacy Tracker: 2009 final report 	<p>October 2009</p> <p>Autumn 2009</p> <p>Spring 2010</p> <p>Spring 2010</p>	Robin Blake
Emerging priority areas	<ul style="list-style-type: none"> Research into the causes of mobile not-spots Consultation on "The implications of Digital Britain for localness regulation" 	<p>Commencing Q3 2009/10</p> <p>Consultation open until 23 October 2009</p>	<p>Zahid Deen</p> <p>Peter Davies</p>

13.12 We look forward to engaging with stakeholders on the progress of our work, and will provide interested parties with an opportunity to comment through our consultations, and interactions with the Consortium of Stakeholders, Consumer Forum and other fora.