

RNIB response to Ofcom consultation "Second consultation on coexistence of new services in the 800 MHz band with digital terrestrial television".

1. Introduction: why RNIB is responding to this consultation

As the largest organisation of blind and partially sighted people in the UK, RNIB is pleased to have the opportunity to respond to this OFCOM Consultation.

We are a membership organisation with over 10,000 members who are blind, partially sighted or the friends and family of people with sight loss. 80 per cent of our Trustees and Assembly Members are blind or partially sighted. We encourage members to be involved in our work and regularly consult with them on policy and their ideas for change.

As an organisation of blind and partially sighted people, we advocate for the rights of people with sight loss in each of the UK's countries. During our current five year strategy period, we want to tackle the isolation of sight loss by focusing on three clear priorities. These are stopping people losing their sight unnecessarily; supporting blind and partially sighted people to live independent lives and creating a society that is inclusive of blind and partially sighted people. Maintaining and increasing access to television for blind and partially sighted people is an important work package for us within that last strategy strand.

Since our Needs Survey in 1991¹ showed that a large majority of blind and partially sighted people watch television, RNIB has taken an active role in highlighting TV access issues. It has worked to try to ensure access to platforms, programmes, services and equipment, both by direct work with broadcasters and manufacturers and by influencing legislation and regulation. In this digital age, being able to watch TV remains important to blind and partially sighted people. In 2006 Research by the

¹ RNIB Needs Survey (1991) Blind and partially sighted adults in Britain: the RNIB Survey Volume 1, by Ian Bruce, Aubrey McKennell and Errol Walker

University of Birmingham² found that around 87 per cent of blind and partially sighted people regularly watch TV and videos or DVDs.

RNIB expects a significant number of blind and partially sighted people to be affected by the proposed changes and resulting need to fit filters for Freeview users: it is generally known that most Freeview users are older, and the older age groups are where most sight loss occurs. In addition, many blind and partially sighted people will have chosen Freeview as their TV platform because it currently offers the most accessible viewing option, particularly if they want to be able to navigate their TV experience with Text to Speech output of menu's and programme guides.

2. Specific consultation responses

This RNIB response only covers the elements of the consultation that are specific to blind and partially sighted people, and therefore focuses mainly on the arrangements for vulnerable consumers and the funding of those. Our responses have relevance for multiple consultation questions and the KPIs should be adjusted to reflect our comments.

2.1. Accessibility of communications to the general public:

As the government has decided to provide consumers with written guidance, an online portal and a contact centre (para 3.4) and as there are many people who with sight problems who are not registered as blind or partially sighted, it is important that the communications to the general public are made as accessible as possible.

This means that:

- any information sent to all consumers should be provided in clear print.
- any online portal containing information for consumers should comply with W3C web accessibility standards.

² Douglas, G., Corcoran, C., Pavey, S. (August 2006) Network 1000: Opinions and circumstances of visually impaired people in Britain: report based on over 1000 interviews.

- any contact centre should be staffed by contact centre staff have undergone an adequate level of disability awareness training.
- Any visual information provided via TV screens should also be voiced

2.2. Additional support for vulnerable consumers:

2.2.1. Eligible groups

RNIB welcomes the government decision to provide additional support for vulnerable consumers and to base the eligibility criteria on those being used for DSO and the Switchover Help Scheme. RNIB is pleased that the government has recognised the need to include registered blind and partially sighted people in the eligible group. RNIB is aware that not all people with significant sight loss do register themselves as blind or partially sighted, and that many older people are living with sight loss. Specifically, 1 in 5 people aged 75 and over are living with sight loss and 1 in 2 people aged 90 and over are living with sight loss. We therefore we welcome the inclusion of people over 75 as eligible for support.

2.2.2. shape of the support

RNIB agrees with the assessment to model the consumer needs and support options for vulnerable consumers "on DSO and the Switchover Help Scheme, due to the similarities faced by vulnerable consumers during Digital Switchover (DSO) and those experiencing DTT interference. For DSO, the main concerns were that vulnerable consumers might struggle to read and understand the information provided and take the necessary actions to maintain their access to TV services, including connecting new digital equipment." (Para 7.184)

In implementing this support, the following elements need to be taken into account with a view to providing adequate support to blind and partially sighted people. It is particularly important to note these points, as they will not have been captured in the research conducted by Essential Research / SPA Future Thinking, as that work did not feature any participants with visual impairments.

- MitCo can not assume that advertising of help to the general public will reach blind and partially sighted people. All registered blind and partially sighted people will therefore have to be proactively written to, inviting them to apply for support. This would correspond with the approach taken by the digital switchover help scheme. If the necessary legislation was put in place for MitCo to have access to the registers of blind and partially sighted people, this approach could be used again.
- We expect the content of these materials to be specifically designed for blind and partially sighted people.
- Any correspondence with blind and partially sighted people should happen in an appropriate format to meet their information needs, i.e. information has to be available in Braille, audio or large print.
- The consultation identifies that where filters do not provide access to Freeview, platform changes will have to be implemented for individual households. Any platform changes that affect blind or partially sighted people should be implemented in such a way that the overall accessibility of their TV experience does not decline. For example, people who have bought an accessible DTT television with text to speech output because that best meets their accessibility needs, will require another platform solution that offers the same level of accessibility.
- Requests for assistance from blind and partially sighted people will have to be responded to by MitCo staff with sufficient level of visual awareness training, and this applies to call centre staff as well as technical installers.

2.2.3. involvement of charitable organisations in providing support

The consultation suggests (para 7.189) "that the campaign may also involve engagement with voluntary groups for information support to target the hardest to reach vulnerable consumers. In this regard, there may be potential to leverage the lessons learned and capabilities developed as part of the DSO 'Community Outreach Programme.'"

RNIB is happy to consider with Ofcom and MitCo in more detail which contributions it can make to ensure that blind and partially

sighted people get the best information and support possible to meet their needs. However any information and support that RNIB provides would have to be fully funded by MitCo, as it would be additional to our current strategic plans as a charity. RNIB would welcome an invitation from Ofcom for detailed discussions about this.

It is important to note that the DSO Community Outreach Programme has not undertaken activity specifically aimed at reaching blind and partially sighted people.

2.2.4. Cost and budget for the support

Due to the additional essential elements of support for blind and partially sighted people that RNIB has identified above, and the proactive approach we expect MitCo to take, it is unlikely that the sum of £20 million identified in the consultation to cover the costs of providing additional support to vulnerable consumers is sufficient. RNIB urges that this figure be reviewed to enable MitCo to fully meet the needs of blind and partially sighted people.

2.2.5. Governance of MitCo and consumer representation (question 7.2 and 7.3 of the consultation)

RNIB agrees with the proposal to appoint an independent chairperson/CEO of MitCo.

RNIB agrees with the proposal to appoint a consumer interest advisor with voting status. However this is not sufficient to ensure that the interests of vulnerable consumers are represented. RNIB therefore suggest that one of the following 2 options is followed:

- option 1: the consumer interest advisor would have to have a track record of advocating for the vulnerable consumers meeting the DSO help scheme criteria.
- option 2: in addition to a "consumer interest advisor", a second advisor with specific knowledge about vulnerable consumers, or "vulnerable consumer interest advisor" is added.

2.2.6. Performance measures and KPIs

RNIB agrees with the proposed KPIs (para 7.87) regarding vulnerable consumers, namely:

- 99.9% of installations for eligible vulnerable households completed within 8 working days from visit requirement confirmation by the Contact Centre
- 98% of vulnerable households in an area experiencing interference and requiring installation support receive a 'first time fix'

In addition to these KPIs, we expect KPIs to be developed to monitor the performance of MitCo against the criteria we list in section 2.2.2. of this consultation response.