

Action on Hearing Loss is the charity formerly known as RNID. Our vision is of a world where deafness, tinnitus and hearing loss do not limit or label people and where people value and look after their hearing. We help people confronting deafness, tinnitus and hearing loss to live the life they choose. We enable them to take control of their lives and remove the barriers in their way. We give people support and care, develop technology and treatments, and campaign for equality.

Our response will focus on key issues that relate to people with hearing loss. Throughout this response, we use the term 'people with hearing loss' to refer to people with all levels of hearing loss, including people who are profoundly deaf. We are happy for the details of this response to be made public.

1. Introduction.

Action on Hearing Loss welcomes the opportunity to comment on Ofcom's proposed Annual Plan for 2016/17. Media and communications are rapidly evolving as technology develops, and we urge Ofcom to regulate the changing market in a way that protects and furthers the interests of all citizens, including people with hearing loss.

1.1 Standards and Quality.

We welcome Ofcom's on-going commitment to secure high standards in broadcasting, and we urge Ofcom to promote the needs of people with hearing loss and ensure that no one is left behind in the digital age. We note that Ofcom will be providing advice to support the new Audiovisual Media Services Directive, and we urge the regulator to protect the needs and interests of people with hearing loss in the European market.

We support Ofcom's work in the regulation of broadcasting and welcome their commitment to review the rules and guidance for live subtitling. The quality of live subtitling, including clarity of speech, is of particular concern for our members and we believe Ofcom can play a vital role to ensure that higher standards are met and maintained.

In January 2016, Ofcom assumed responsibility for the regulation of video-on-demand content. Ofcom's regulatory predecessor, ATVOD, reported that three out of four (76%) of the UK's 90 on-demand providers offer no subtitles (ATVOD 2015, 'Provision of Video on Demand Access Services 2015 Report'). We look forward to Ofcom's upcoming action on the regulation of on-demand programme services and we hope that this further aligns the requirements for access services, including subtitles, with those applied to linear television.

1.2 Next Generation Text Relay.

We welcome Ofcom's plan to monitor the operation and take up of next-generation text relay that facilitates access to telephone systems for people with hearing or speech impairments. The UK telecommunications network must meet the varying communication needs of people with hearing loss, including BSL users and hard of hearing people with good speech, and we look to Ofcom to support promising new and emerging speech-to-text technologies.

We also welcome Ofcom's proposal to work with stakeholders in order to understand the experience of users, and we believe that user feedback will be essential to ensure that the needs of people with hearing loss are met effectively.

2. Conclusion.

Ofcom's Annual Plan recognises the changing nature of the market and we look to Ofcom to ensure that technological developments in the digital age of broadcasting and telecommunications are accessible to people with hearing loss. As media and communications evolve, people with hearing loss should not be left behind.