

Ofcom Draft Annual Plan 2013/14

The National Association of Deafened People (NADP) welcomes the opportunity to respond to the Ofcom Draft Annual Plan 2013/14. NADP is a national support and campaigning organisation for people with a hearing loss who use spoken and written language for communication. In this response we will therefore concentrate on issues that are relevant to those people.

We welcome the section of the plan setting out what Ofcom intends to “ensure the provision of services for consumers with hearing impairments” (paragraphs 5.46-5.52). We are pleased that Ofcom has mandated a next generation text relay service and look forward to working with both Ofcom and BT to ensure that this service meets the needs of deafened people and that the key performance indicators for the service are appropriate. We also welcome the commitment in paragraph 5.51 to continue to explore the use of speech recognition technology to allow a more natural conversational flow and higher transcription speeds than are possible using a typing relay service as at present. We would also encourage Ofcom to monitor the new service on a regular basis to ensure that it continues to develop to meet the needs of text relay users and does not stagnate in the same way as the current service has been allowed to do. We also welcome the continued review of General Condition 15 mentioned in paragraph 5.52 and will be responding separately to the call for inputs.

We would point out that ensuring the provision of services for consumers with hearing impairments should not be limited to development of relay services and that appropriate access services in broadcasting are of equal importance. We note this is mentioned in passing in paragraph 3.36 but not further developed. We are aware that Ofcom held a round table on the quality of live subtitling last autumn but we are disappointed that we have not heard anything further about this work or what the outcomes are likely to be. The poor quality of live subtitling, and also the use of live subtitles for programmes that are not actually live, is the issue on which NADP receives most complaints and it is vital that steps are taken to improve the current situation. We are of course aware that Red Bee Media is introducing their new software system, Subito, this year, but we are not convinced this will resolve all the current problems. We are therefore very concerned there is no further mention of work in this area in the draft Annual Plan.

In this context we note the discussion of linear versus non linear content services that starts in paragraph 2.39 and that the consumption of non linear services, while still small, is growing year on year and therefore becoming of increasing importance. It is essential that access to non linear services for users with a hearing loss keeps step with this growth or they will increasingly lose out. We appreciate that Ofcom has more limited powers in this area and that leading on this issue has been delegated to ATVOD, but we strongly feel this is an area of growing importance that will need more work. We would like to see this recognised in the draft Annual Plan.

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