

## Communications Consumer Panel and ACOD's response to Ofcom's consultation on review of signing arrangements for relevant TV channels

### Introduction

The Communications Consumer Panel and ACOD welcome the opportunity to comment on Ofcom's consultation on the review of signing arrangements for relevant TV channels.

The Panel works to protect and promote people's interests in the communications sector. We are an independent body, established by the Communications Act 2003. The Panel carries out research, provides advice and encourages Ofcom, Government, the EU, industry and others to look at issues through the eyes of consumers, citizens and micro businesses. The Panel pays particular attention to the needs of older people and people with disabilities, the needs of people in rural areas and people on low incomes, and the needs of micro businesses, which face many of the same problems as individual consumers. There are four members of the Panel who represent the interests of consumers in England, Northern Ireland, Scotland and Wales respectively.

Following the alignment of the Advisory Committee for Older and Disabled People with the Panel, the Panel is more alert than ever to the interests of older and disabled consumers and citizens.

### Response

***Q1. Do you agree that it would be appropriate to increase the minimum contributions to alternative signing arrangements to bring them back to the 2007 level in real terms, and to make annual adjustments for inflation thereafter? If not, why not?***

Yes, in the light of the effects of inflation in reducing the value of the annual contributions for alternative signing arrangements and rising broadcaster revenues, it is right as a minimum to restore the value of the contributions to that initially assessed and to make annual adjustments for inflation into the future.

***Q2. Do you agree that it would not be appropriate to base adjustments to the minimum level of contributions to alternative arrangements on comparisons with the costs of existing sign-presented programmes, or with general TV production costs? If not, why not?***

We recognise the problems identified by Ofcom in basing adjustments on costs of existing sign presented programmes or general TV production costs. We agree that BSLBT's data are probably too small to base decisions on, especially since the amount of new commissions they have been able to make annually has fallen so dramatically. However,

we did wonder if there would be any value in looking at their data across several years to help get a better picture of long-term costs and possible trends, especially if they are able to commission more as a result of the proposed measures.

We are impressed by Ofcom's points about: the significance of sign interpretation costs, both in production and on screen, and the use of outreach staff by BSLBT. With increasing requirements for signers, for example with the growth of video relay, we understand that there is likely to be a continuing shortage of signers: both hearing people and deaf people with English skills adequate to translate from autocue into BSL for programmes. Such a shortage could lead to significant real term increases in sign interpretation costs. We believe Ofcom should keep this under review and be prepared to link adjustments to sign interpretation costs if these increase significantly faster than the Consumer Price Index (CPI) and prove to be a bar to maintaining and increasing levels of sign-interpreted programmes

***Q3. Do you agree that it would be appropriate to make annual adjustments to the minimum contributions to alternative arrangements in line with the Consumer Price Index, and to make consequential change to the Guidance, as set out in Annex 4? If not, why not?***

We believe that the arguments for basing adjustments on CPI are the strongest of the options set out by Ofcom. We do, however, as noted in our response to Q2, believe that Ofcom should be prepared to consider a link to the cost of sign interpretation, if this increases significantly faster than CPI.

***Q4. Do you consider that minimum signing requirements for relevant channels should remain fixed at 30 minutes a month or should rise progressively over a ten year period to 75 minutes a month? If the latter, do you agree that consequential changes should be made to the Code, as set out in Annex 4? Please explain the reasons for your preference.***

We favour a progressive rise to 75 minutes over ten years, believing that deaf consumers of relevant channels should benefit from improvements over time equivalent to those for other access services and other channels. We also support consequential changes to the Code.

***Q5. Do you consider that the transitional arrangements set out in Figure 4 would be appropriate if relevant channels are made subject to rising obligations? If so, do you agree that consequential changes should be made to the Code, as set out in Annex 4?***

Yes.

***Q6. Do you consider that minimum contributions by relevant channels to alternative requirements should remain fixed at £20,000 a year (adjusted for inflation) or should rise progressively over a ten year period to £50,000 a year (also adjusted for inflation)? Please explain the reasons for your preference***

We believe that fixed contributions, albeit adjusted for inflation, would be inadequate and favour a progressive rise in contributions.