

Organisation (if applicable):

British Deaf Association

Additional comments:

We are happy for you to show BDA answers to your questions on your publication.,

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Question 1: Do you agree that the transitional period should be extended to 31 December 2016, during which time broadcasters would be able to provide additional subtitling (comprising 5% of their qualifying hours) on top of their existing subtitling quota, in lieu of their signing obligation? :

Regretfully, for Deaf people viewing broadcast television, there has been undue delay both from Ofcom and the broadcasters in meeting their obligations with regards to providing sign language access to television for the non-domestic channels.

Ofcom's original statement on Access Services for non-domestic channels was published on 1st October 2012 - more than three years ago: surely this is more than adequate to come to a decision, and we strongly advocate that:

1) a more concerted effort, with regular consultation and review with selected contacts actively representing the Deaf community for quality assurance (for example qualified / registered deaf translator - in-vision sign language translation), there is a need for consistent quality control implementation and embedding the signing requirements.

2) it is important to remember that simply providing more subtitling, which apparently seems to be an easy option for Ofcom and the broadcasters. This does NOT meet the needs of the sign-language communities in the UK & Europe.

Question 2: Do you agree that requirements on non-domestic channels to provide minimum amounts of sign-presented programming should rise over time, as shown in the table at Figure 3, in the same way as the requirements on domestic channels? :

Yes, we totally agree that the requirements should rise over time in the same way as the requirements for domestic channels - and we think that the proposed increases are modest and need be reconsidered with a view to reaching a minimum of 120 minutes by the tenth anniversary.

Question 3: Do you agree that any requirements to provide sign-interpreted programmes or extra subtitling should rise over time as indicated in the table at Figure 3? :

Again yes, we totally agree. However our agreement with this statement relates to the principle of increases over time rather than acceptance that the present sign-interpreted programmes or subtitling meets the needs of the Deaf community in any country/region.

Question 4: Do you agree that, in cases where Ofcom has decided that a substitute requirement is appropriate, it should: a) consider proposals for alternative arrangements that would contribute to the provision of the same type of assistance, and b) make the consequential changes to its Guidance as shown in Annex 5? :

a) We do NOT believe that "substitute requirements" will meet the needs of many Deaf people whose first and/or preferred language is sign language. Access to language and full access to information and entertainment in their first or preferred language is paramount to them to understand and fully participating in the mainstream world.

b) The Communications Act specifically set out requirements for Subtitling and Signing and that principle MUST NOT be relinquished

Question 5: Do you agree that the proposed minimum contributions towards alternative arrangements should rise over time, as set out in the table at Figure 3, and be protected from inflation by index-linking to the UK Consumer Price Index? :

Yes, we totally agree.

Question 6: Do you agree with the proposed amendments to the Code and Guidance? :

Only as above

Question 7: Do you agree with Ofcom's initial view that requiring non-domestic channels broadcasting in the Republic of Ireland to be subject to specific signing obligations would be disproportionate?:

We don't have particular view.

Question 8: Do you agree with the proposal that the implementation of access service obligations for channels targeting EEA EFTA member countries should start from 1 January 2017? :

Yes, we agree.

Question 9: Are you a deaf sign language user? If so, which country do you live in? And which kind of assistance would you prefer?:

Yes, our members are Deaf sign-language users from the UK. Our preference is for sign-presented programming.

