

Response from Royal National Institute of Blind People (RNIB)

1. About us

We are the largest organisation of blind and partially sighted people in the UK and welcome this opportunity to respond to the consultation.

We are a membership organisation with over 14,000 members who are blind, partially sighted or the friends and family of people with sight loss. More than 80 per cent of our Board of Trustees are blind or partially sighted. We encourage members to be involved in our work and regularly consult with them on government policy and their ideas for change.

We campaign for the rights of blind and partially sighted people in each of the UK's countries. Our priorities are to:

- Be there for people losing their sight.
- Support independent living for blind and partially sighted people.
- Create a society that is inclusive of blind and partially sighted people's interests and needs.
- Stop people losing their sight unnecessarily.

We provide expert knowledge to business and the public sector through consultancy on improving the accessibility of information, the built environment, technology, products and services.

RNIB welcomes the opportunity to respond to the Ofcom call for inputs on designing the broadband universal service obligation.

2. Response

Most of the policy areas in this call for inputs are not specifically relevant to our constituency, or fall outside the realm of our organisational knowledge. We have therefore limited our response to a few important areas.

2.1 Demographics and need

The number of blind and partially sighted people in the UK is increasing. There are about 360,000 people in the UK who are registered as blind and partially sighted. About half are blind, and the other half partially sighted.

The majority of the UK's blind and partially sighted people are older people.

In 2015 RNIB published the "My voice" survey, which contains some findings which we believe are very relevant to the broadband USO.

Less than one in three blind and partially sighted people felt able to make the most of new technology, with a particularly low level of technology usage among people aged 75 years and over. However, the majority of blind and partially sighted people who do not currently use technology would like to use it if obstacles were removed.

The majority of people we surveyed who were not using the internet would like to: 66 per cent said that if there were no obstacles they would like to go online. Similarly, 65 per cent who were not using a computer would like to do so if all obstacles to using one were removed, including 63 per cent of people aged 75 and over.

Although computer usage among older blind and partially sighted people remains low, there is some evidence to suggest that it has increased over the last decade. In our Network 1000 survey of 2005-6, only 12 per cent of participants of retirement age used a computer. In the My Voice 2015 study, 27 per cent of participants of pension age used a computer

Blind and partially sighted people accessed their computer in a range of different ways, with 82 per cent making some form of adjustment or using access technology.

We asked all participants who were not currently using a computer what stopped them from using one. 21 per cent referred to the **cost or availability of equipment** as a barrier.

Importance of the internet for a group of people who face mobility barriers

In our “My Voice” survey, blind and partially sighted people reported using the internet for a variety of reasons, such as shopping (52 per cent), keeping up to date with local news (51 per cent), travel (42 per cent) and managing money (36 per cent).

In this context, we should bear in mind that blind and partially sighted people face many **mobility barriers**. Not being able to drive, for instance, many rely on local public transport or taxis. However, many local bus services in the UK have been cut.

Prices of train services consistently rise every year faster than inflation rates.

Some blind people have had their free bus passes removed or restricted too.

In the last few years these barriers to mobility have been compounded by a reduction in benefits for some blind and partially sighted people, which undermines their ability to use taxis to travel or pay for guided assistance.

Therefore, access to broadband can be of particular assistance to blind and partially sighted people. It can bring goods and shopping to a blind person through online ordering and parcel delivery; a particular boon for a person who might find it hard to get out and about.

Broadband access can also provide access to wayfinding services for blind and partially sighted people. For instance train and bus timetables are easier to find and browse online and being able to plan routes before leaving home can be done utilising GPS technologies.

Furthermore, a broadband connection can provide access to vital information that might otherwise be hard to come by. For example, a hospital appointment letter sent to a blind person by email, rather than by inaccessible standard print on paper.

1.8 We are interested in stakeholders' views on the minimum download speed for a broadband USO, as well as which other aspects of technical performance should be specified, and at what level.

A usable speed should be available across the country since those in more rural settings may have less access to public transport and so be more reliant on broadband for services such as home shopping.

1.11 A USO may also include particular measures for the benefit of those on low incomes or with special social needs. For example, BT (and KCOM in Hull) provides a 'social tariff' for consumers on certain income-related benefits. We are interested in evidence and views on the extent to which a social tariff for broadband services may also be appropriate.

A lack of broadband connection and not being online to access email is not, as we know, always about the affordability of a service. The affordability of additional equipment and of knowledge, support and training can also be a factor, however.

RNIB therefore supports a call for a social tariff as suggested. This would assist blind and partially sighted people on certain income-related benefits.

1.18 Under the USO, a universal service provider (USP) is only required to meet requests for a USO connection that are considered 'reasonable'. Defining 'reasonableness' will be an important factor in determining who can benefit from the USO and the overall cost of delivering the USO. We are keen to achieve a proportionate balance between ensuring as many consumers as possible benefit from the USO and ensuring the costs of delivery are not disproportionate.

RNIB believes that a user making a request for a USO connection should be deemed to be making a reasonable request if he or she is certified as being blind or partially sighted.

Page 7 of the call for inputs: When, and on what basis, should the USO be reviewed?

RNIB believes that there should be reasonably frequent reviews to ensure that the USO is working. After all, this is a fast-moving policy area. We believe also that there should be an initial review after a timeframe of roll out to see what has worked and what may not have worked so well.

3. Conclusion

RNIB represents a constituency that continues to need and value the universal service. We will follow discussions and developments relating to that service with great interest. We look forward to continuing our input to those discussions with Ofcom, DCMS and other relevant stakeholders.