

Title:

Mr

Forename:

Terry

Surname:

Riley

Representing:

Organisation

Organisation (if applicable):

BRITISH DEAF ASSOCIATION

What additional details do you want to keep confidential?:

No

If you want part of your response kept confidential, which parts?:

NOTHING

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Additional comments:

- Very pleased that Ofcom are carrying out this review.
- Proposals ...A big step forward but really not enough Ofcom needs to go further.
- Funding is a big issue: Q) Why can't or How can channels with an audience share of more than 1% be part of alternative arrangements?more
- Feedback from Deaf community is BSLBT has made a very good start in providing programming that the BSL community wants and importantly needs & want more
- Good start but not nearly enough programmes. And too many repeats.
- 50% of Board are Deaf, 60% of staff are Deaf
- Opportunities for Deaf people to develop programme-making skills

- Empowerment and positive role models.
- Diversity Language and Culture on screen

Question 1: 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?:

Direct answer Yes.

Rationale

- Ofcom says that broadcaster revenues went up by 112% between 2008 and 2012. These figures are two years old so the increase will be higher when 2013 (and 2014) are included.
- If the subscription level had gone up every year by the rate of inflation there would have been significantly more money for making more programmes with more realistic budgets.
- Broadcasters must have saved a LOT of money by subscribing to BSLBT as there have been no increases since 2007. All other access services have gone up significantly.
- The original subscription level of £20,000 was low to start with. Where did the figure of £20,000 come from? Has Ofcom considered increasing the basic subscription level? If not, why not?

Rationale

The cost of making programmes has increased vastly since 2007 and whilst the production companies were initially accepting with low funding it has now become impossible to make high quality and of good production value on such a meagre income.

Plus the income that broadcasters now received has also vastly increased since 2007

So Yes the broadcasters should now increase their minimum contribution

The average cost of making a deaf programme like See Hear is around £45K per programmes

Question 2: 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?:

- Yes, agree. Accept the points made by Ofcom. BSL programming has different cost structure to mainstream programming.

Rationale

- Making a deaf programmes by its very nature is more expensive than general TV production programmes as they have to put their own subtitles and also BSL Interpreters or presenters

- Plus you need Production interpreters which again this is an additional cost and not claimable under ATW

Question 3: 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?:

- Basing the increase on Consumer Price index in 2014 runs at 1.4 % yet in real terms it should be calculated from 2007. How can we make an informed decision ?

Question 4: 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. :

- Yes, the minimum signing requirements for relevant channels should rise.
 - 30 minutes a month, or about 7 minutes per week, is much too low.
 - Want to clarify Sky and other subscriptions from 20-50y that this is 30 minutes of actual programming - not a 30-minute slot which could have six minutes or so of advertising.
 - Welcome the increase to 75 minutes per month over a ten year period but this does not go far enough. This is not a large increase (as Ofcom says) when the starting point is so low (which Ofcom acknowledges).
 - There should have been increases to sign-presented programming since the alternative arrangements came into place seven years ago.
 - The review is overdue and there should be greater increases to make up for all this time. 90 minutes a month? 120 mins a month? I would even venture to ask
- Why only 30 mins a month and an increase to 75 mins a month given that Deaf people pay the full licence fee the same as everyone else plus and only 75 mins we pay upwards from £25-£60 per month for Sky or Any other digital channel Virgin etcits about Equality

Question 5: 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?:

Straight answer....No, the proposed increases should take effect from 2015. To remedy the loss of income since 2007

- Broadcasters should begin to make up for the last seven years immediately.
- Interpreted programmes have risen from 2% to 5%, audio description to 10+% and subtitling to 80%.
- Can I ask Why should broadcasters be offered this arrangement?
- Ofcom has calculated the impact on broadcasters based on their 'relevant' revenues in 2012. This is too cautious - revenues will have continued to rise in 2013 and 2014. This means that the real percentage which broadcasters would have to pay is very likely to be less than Ofcom's calculations.
- What is 'relevant' income?
- Need to balance the need of BSL community for access to television (for the purposes of providing entertainment, information and education to the BSL community in their own language and culture) with not being too burdensome on broadcasters. This review reads very much as seeking to please the broadcasters.

Question 6: 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.:

- Yes, contributions should rise progressively over a ten-year period.
- Contributions should rise in line with the increases in content over time.
- The additional funds are badly needed to make more BSL programming available to Deaf people - especially in the year of a General Election so that Deaf people will be able to participate in a more informed way.
- The funds are badly needed so that more Deaf people can learn to make programmes and develop their skills. BSL programmes must be made by Deaf people who use BSL.
- There should be fewer repeats - and more new content covering the full range of programme genres, including News and Children's programmes.
- Ofcom should state that no programme should be shown more than twice a year, or if it is repeated more than once it should not count towards the monthly requirement.
- They should pay BSLBT & other people (who are other people ?)
- the going rate for making sign presented programmes around £40-£50K ?
- Question Has Ofcom thought outside the box, and thought about how they could get more programmes for the deaf community. Example Did Ofcom consider allowing channels with an audience share of more than 1% to join BSLBT? If not why not as 1% is quite low