

**Title:**

Mr

**Forename:**

Charlie

**Surname:**

Swinbourne

**Representing:**

Organisation

**Organisation (if applicable):**

Limping Chicken website

**What additional details do you want to keep confidential?:**

Keep part of the response confidential

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

None

**Ofcom may publish a response summary:**

Yes

**I confirm that I have read the declaration:**

Yes

**Additional comments:**

**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?:**

Absolutely. It's wrong that the amount did not increase with inflation in the last 5 years, which means that money to pay for BSL programmes has gone down in real terms.

This has meant less TV programmes have been made in BSL than should have been made.

It also means the TV channels have saved money - while everything else has increased, that amount has stayed the same.

It's vital that this is brought back to the equivalent of £20,000 in 2007, and then that this amount stays the same in real terms by increasing with inflation each year.

This at least would mean that the amount of funding programmes made in BSL can be maintained.

**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?:**

I do agree with this. There are so few Deaf TV programmes being made that the comparison would not be helpful.

Deaf television does incur different costs to mainstream programmes (access costs such as BSL interpretation, subtitling and so on, for example) so this would also not be an appropriate comparison.

**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?:**

Yes. This is a well-respected index that is used to calculate increases in other areas such as benefits and so on.

This would be an appropriate way of making sure that the amount of funding was maintained in real terms.

**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. :**

The minimum signing requirements should increase to 75 minutes a month as soon as possible.

Subtitling requirements increase each year (up to a certain level) and this means that deaf people who prefer subtitles have had more access over time.

Indeed, TV as a whole is almost fully accessible via subtitles now - a massive change from a few years ago.

However, the requirement for providing BSL has stayed the same - so Deaf sign language

users have not benefited from having more access to TV to the same extent as deaf people who use subtitles.

For me, the amount of BSL provision should be increased more rapidly than is suggested here.

The amount has stayed fixed at 30 minutes a month for 5 years now, and increasing it slowly means that Deaf sign language users are still missing out.

**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?:**

Again, I do not believe that the transitional arrangements happen quickly enough.

According to figure 4, the amount would not increase to 45 minutes a month until 2016, which is a further delay for Deaf sign language users who do not have enough provision as it stands now, in 2014.

I do believe that the changes should be made to the code, but that it should start to change in 2015, rather than 2016 as is proposed.

**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.:**

The minimum contributions should increase, so that more sign language programming can be made.

This will benefit Deaf sign language users, who will be able to see more programmes in BSL, of a higher quality, because of better funding.

At the moment, there is such a small amount of provision for Deaf BSL users. They prefer seeing programmes in their own language (rather than interpreted via an invision signer) and they deserve more programmes, more choice, more information and more entertainment - in BSL.