

**Title:**

**Forename:**

**Surname:**

Name withheld 13

**Representing:**

Self

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

Keep name confidential

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

**Ofcom may publish a response summary:**

Yes

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

Yes

**Additional comments:**

I am writing as : an academic with a background which includes media studies ; an active member of the Deaf community, locally, nationally and internationally ; the instigator of the first BSL TV programmes back in 1979 which paved the way for all that has followed.

I mention these attributes to indicate that a wider framing of the whole subject is required - if not at this round, then certainly the next time round. Examples are given below.

1. I wish to thank OFCOM for taking this initiative.
2. I accept that you are bound by certain laws, but would point out that there is a difference between laws and the interpretations placed on them by policymakers, which would bear closer examination in future.
3. I and other Deaf people are concerned about the way funding for these kind of 'access' activities are all placed within one pool of financial resources, so that a 'crabs in the barrel' situation is created.
4. I may be misguided, but I see OFCOM as mediating between the community in question and the broadcasters. I think it would be a mistake to see the two 'groups' as equal in terms of power and influence. The playing field slopes more than Lords, and I believe that OFCOM

could safely 'err' on the least powerful side in order to locate a genuine middle ground.

5. From the consultation meetings (though not reflected in the 'minutes' taken for the first meeting) we have seen how Deaf people have put forward a number of compelling arguments as to the community's need for information in BSL. They have argued the case for those less fortunate than themselves, particularly in matters related to life and death information such as health, as citizenship information such as informs current affairs - and much more besides.

6. I am not sure that sufficient attention has been paid to the fact that, unlike subtitle users, who can access anything in print that they wish, the BSL community has great difficulty accessing English, due to the poor state of Deaf education. Likewise, blind persons have full access to all radio stations, night and day.

These are fundamental inequalities, which are then reinforced by the present allocation of resources.

7. Because BSL is one of the 4 indigenous languages of the United Kingdom, it should be treated as such in terms of TV resources. This is not the place to spell out the immense differences between BSL funding, and Gaelic and Welsh TV funding, but the issue needs to be taken on board.

In particular, the numbers of BSL users who cannot easily access English should be compared with the numbers of Gaelic and Welsh users who are similarly monolingual - not the bilingual numbers.

8. All these wider framing issues lead me to summarise the present situation as being highly unsatisfactory. We are being led to believe that the broadcasters will object to the utterly miniscule rises that are being proposed, when anyone with common sense and a conscience knows that they spend 20K without blinking an eye on other aspects of their work..

I do not believe that they have any genuine moral arguments that can challenge the points above, and many more that Deaf people have made. They may have lawyers [on whom they may spend more money than the sums actually contested here] to finagle and play with words, but that is all.

Thus I believe that OFCOM must be firm in taking a stance which works towards genuine equality.

9. Having said all this, I believe that the actual sums and hours proposed would be laughable if they were not so sad. I accept that to some extent OFCOM's hands are tied, and that BSL communities must take these matters up with Parliament. But as stated earlier, I do feel there exists room for policy interpretation which should greatly enlarge both the hours and the funds proposed.

10. I believe that it is crucial to keep the funding for BSL TV to its present form - of being channelled through BSLBT. A central body is necessary to ensure that standards are met, and that Deaf people are not left isolated within mainstream companies which have no interest in spending the time and resources required to employ Deaf film makers and actors etc on a consistent basis. We are still in the process of developing the talents needed to produce BSL TV and film, and the BSLBT is proceeding very well indeed along that path, and winning

numerous international awards as it does so.

11. Finally I would like to express my disappointment with the way the consultation process has been dealt with. It has not really sought out BSL consumers in a serious way, and the questions are written so unclearly at times that even an English user will struggle. They have not been made available to BSL users. Running the consultation during the summer holidays has been most unhelpful in rounding up BSL views.

The huge responses to the Scottish Parliament's requests for input [much higher than for almost all hearing people's responses to other bills] gives an idea of what true access could look like.

I am concerned that having only a few responses from BSL users will play into the hands of broadcasters, when the problem lies partly with how OFCOM have failed to genuinely make contact with the constituent community.

**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?:**

Yes, and they should be higher, for many reasons.

**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?:**

Appallingly worded question :-(

But yes I agree.

**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?:**

I think this is the minimum required, and that the proposals should go further.

**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. :**

I believe they should rise immediately to 45 minutes or more, and go beyond that which is currently proposed. Apart from all the reasons given earlier, the progressive increase in subtitling and audio description seems to be proportionately greater.

**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?:**

I believe these proposals are the minimum, and should go much further.

**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.:**

I believe the minimum contributions should rise progressively beyond £50,000 a year. Reasons have been given earlier, but the amounts expended on subtitling and audio description and the 'crabs in a barrel' argument for me apply here also.