

## **Organisation:**

Sense

## **Additional comments:**

Sense welcomes the opportunity to respond to this Ofcom consultation regarding the proposed improvements to EPG accessibility. Everyday technologies such as televisions and their content remain an essential source of information and entertainment for many people with dual sensory impairment. Sense estimates the number of deafblind people in the UK in 2010 was around 250,000; 222,000 were aged over 70 years and 33,000 were between the age of 20-69, and 4,000 estimated to be children (0-19 years). Living in an aging population where these figures are expected to increase substantially means that the subsequent demand for accessible technology and content will rise. Customisable functionality (being able to select your preferred font size and style, font and background colour and the position of text/content) of services and devices is essential to truly optimize accessibility for all. In a recent Sense report "Usher Information and Research Survey: The Findings" (Y Tedese, 2013) , 18% of those with Usher Syndrome taking part in the research wanted more information on customisation of smart TV functionality.

Sense

Sense is the leading national charity that supports and campaigns for children and adults who are dual sensory impaired (deafblind). We provide expert advice and information as well as specialist services to dual sensory impaired people, their families, carers and the professionals who work with them. In addition, Sense supports people who have sensory impairments with additional disabilities.

Dual Sensory Impairment

Dual sensory impairment (DSI) is a combination of both sight and hearing difficulties and refers to all levels and combinations of hearing and visual impairment. People can be born with DSI, or acquire impairment due to genetic or hereditary conditions, through illness, accident or in older age and commonly have difficulties with accessing information, communication and moving around their environments.

### **Question 1: Do you agree with the range of potential benefits of TTS for TV viewers with visual impairments described in paragraph 3.5? Do you have any information that would help to quantify the potential benefits?:**

"An individual's personal circumstances will dictate how they wish to access their information. I currently use a Freeview set-top box with speech capability, allowing me to access the EPG and it is very easy to use. I am able to access the EPG as well as the library of programmes I've recorded. The speech output is clear and it can be slowed down or speeded up as required." (comment from a deafblind person about use of EPG)

Yes, Sense agrees with the range of potential benefits of TTS for TV viewers with dual sensory impairment as described in paragraph 3.6 of the consultation. People with DSI often experience difficulties accessing information. Receiving information can require significant amounts of concentration and perseverance which can be time consuming and cause fatigue. Sense therefore agrees that increasing the availability of speaking EPG's would benefit many with DSI enabling them to connect with society, without which there is an increased risk of isolation and impact on mental health.

DSI is however unique to each individual and as such their needs and personal preferences

for technology will be different. Speaking EPG's must meet the needs of the user, offering the information at appropriate speeds (not too fast or too slow), pitch and volume. The solution is to ensure that systems offer good quality customisation, allowing the person to choose the settings that best suit their needs and preferences.

The audible output of the speaking EPG should be compatible with other technologies used by those with hearing or dual sensory loss. These include FM, Infra Red, Telecoil loop systems and Bluetooth streaming products used with or without hearing aids. Such technologies allow the person with hearing/dual impairment better quality access to the audible output of the television reducing distortion and distance, significantly improving the ability to hear despite the hearing loss, therefore compatibility is essential.

**Question 2: Do you have any information that would help to quantify the additional costs that EPG providers and TV receiver manufacturers would face in providing TTS capability in multi-functional TV receivers?:**

No

**Question 3: Do you agree that the EPG Code should be amended as proposed in Annex 5 to require that EPG providers use their best endeavours to secure that TTS-enabled EPGs are incorporated in multi-functional TV receivers?:**

Yes, in combination with the points raised in Question 1, Sense agrees that the code should be amended to encourage EPG providers to secure TTS enabled EPG's in multi-functional TV receivers.

**Question 4: Do you have any information that would help to quantify the additional costs that EPG providers and TV receiver manufacturers would face in providing the ability to highlight or list separately programmes with audio description and signing in multi-functional TV receivers?:**

No

**Question 5: Do you agree that the EPG Code should be amended as proposed in Annex 5 to require that EPG providers use their best endeavours to secure that EPGs in multi-functional TV receivers enable users to highlight or list separately programmes with (a) audio description and (b) signing?:**

Yes, Sense agrees that the EPG code should be amended as proposed in Annex 5 to encourage EPG providers to list program types separately within the EPG. This will help those with DSI to search, navigate and choose more easily the programmes with specific accessibility features that may be relevant for them.

**Question 6: Do you have any information that would help to quantify the additional costs that EPG providers and TV receiver manufacturers would face in providing the ability to enlarge text or magnify portions of the EPG in multi-functional TV receivers?:**

No

**Question 7: Do you agree that the EPG Code should be amended as proposed in Annex 5 to require that EPG providers use their best endeavours to secure that EPGs in multi-functional TV receivers enable users to adjust the display of EPG information so that it can be magnified or the text enlarged?:**

Yes, Sense agrees that the EPG code should be amended as proposed in Annex 5 to encourage that EPG providers enable the consumer to magnify or enlarge text if they wish to. People with visual impairment or DSI have different preferences and needs for viewing text more easily. Ensuring that text can be magnified or enlarged will provide better access for some people as long as they are well informed about how these changes can be applied.

**Question 8: Do you have any information that would help to quantify the additional costs that EPG providers and TV receiver manufacturers would face in offering the ability to select a high contrast display of the EPG in multi-functional TV receivers?:**

No

**Question 9: Do you agree that the EPG Code should be amended as proposed in Annex 5 to specify that EPG providers use their best endeavours to secure that EPGs in multi-functional TV receivers enable users to have the option of switching to high contrast displays? Do you agree that a minimum contrast ratio of 7:1 would be appropriate for high contrast displays?:**

Yes, Sense agrees that the EPG code should be amended as proposed in Annex 5 to encourage that EPG providers enable the consumer to be able to switch to a high contrast display if required. Because the needs of those with single and dual sensory impairment vary considerably given the cause and severity of their vision loss, the more flexibility EPG providers can offer in terms of the customisation of the contrast the better.

**Question 10: Do you agree that, for the time being, the EPG Code should be amended as proposed in Annex 5 to require that EPG providers use their best endeavours to secure that the additional accessibility features (i.e., text-to-speech, filtering or highlighting, magnification and high contrast displays) are incorporated in EPGs for multi-functional TV receivers?:**

"The technology has moved forward a lot in recent years so the costs of making an EPG accessible would surely not be such that this extra cost has to be passed on to users."

(comment by deafblind person about use of EPG)

Features that enable better EPG accessibility to those with single and dual sensory impairment often benefit others in society, for example being able to select the font and background colours may assist those with colour blindness while TTS functionality may offer better accessibility for those with dyslexia. Therefore Sense does not consider it reasonable for single and dual sensory impaired consumers to pay more for the use of accessible (multi-functional TV receivers only) EPG's that provide an equivalent service as sighted viewers. According to Ofcom<sup>2</sup> people with multiple impairments which includes those with hearing and vision loss are the less "likely to be working: 8% compared with the average of 17% for disabled people overall." In addition to this older people who are more likely to make use of

or need speaking EPG's are of a non-working age having retired. Therefore the income for these groups is far lower than traditional sighted viewers.

**Question 11: Do you agree that EPG providers should be required to use their best endeavours to secure that specified accessibility features are incorporated in multi-functional TV receivers?:**

Yes Sense agrees that EPG providers should be required to secure specified accessibility features in multi-functional TV receivers. However, this level of accessibility must be made available (with no additional charge to the consumer) in basic TV receivers too. Additionally, the information enabling people with DSI to use the new EPG's will also need to be available in a wide range of formats to ensure that it is accessible. In addition it is also imperative that those with DSI are able to access up to date, clear and relevant information regarding the EPG options available and their functionality. This information should allow the consumer to compare the services and products available on the market and thus make an informed decision, choosing to purchase the most appropriate and accessible option to meet their needs.

**Question 12: Do you agree that, absent regulation, the proposed accessibility features might not be included in all new multi-functional TV receivers whose core specifications are determined by the EPG provider or otherwise agreed between the EPG provider and the manufacturer?:**

Yes, Sense agrees that without regulation accessibility features might not be included in all new multi-functional TV receivers. Information contained within section one of Ofcom's consultation document "What's on the telly?" provides substantial evidence to support the need for regulation. Current EPG's available do not provide a consistent package of accessibility options. With increasing convergence and choice in how TV is delivered and watched, regulation is the proven way to protect consumers who are disabled and need accessibility features. Without regulation EPG providers and manufacturers may or may not include some or all of the accessibility features leaving consumers facing a bewildering choice they will struggle to navigate.

**Question 13: Do you agree that the EPG Code should be amended as shown in Annex 5?:**

Yes, but with consideration of the points stated above.