**Response to Ofcom Call For Inputs**

# Speaking TV programme guides:

# Would they help people with visual impairments, and are they feasible?

8 September 2014

This response is submitted by Digital UK on behalf of its Members – the BBC, ITV, Arqiva and Channel 4 - the holders of the terrestrial Broadcasting Act and Wireless Telegraphy Act licences.

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# 1. Introduction

## 1.1 About Digital Terrestrial Television (DTT)

Digital Terrestrial Television (DTT) is the UK's most popular TV platform. At the heart of DTT in the UK is Freeview – a universally available service offering a range of more than a hundred free-to-air TV, radio and text-based services. It is watched in more than 19 million homes, three-quarters of the total. Freeview is the sole television platform in more than 10 million homes (40 per cent).

Prior to digital switchover (DSO), more than four million UK households could not access Freeview and elsewhere signal strength was variable. Thanks to industry investment in excess of a billion pounds, switchover made Freeview available to 98.5 per cent of homes.

Viewers are overwhelmingly satisfied with the Freeview service, and post-switchover research demonstrated viewers enjoy the selection of channels, picture quality and functionality.

## 1.2 About Digital UK

Digital UK supports the UK's terrestrial TV service and its viewers.

The company is responsible for day-to-day operational management, including the Freeview electronic programme guide, and leads on developing platform strategy, working with its broadcast partners and industry. It also provides viewers with information and advice about terrestrial TV channels, services and reception.

Digital UK is owned by the BBC, ITV, Channel 4 and Arqiva.

# 2. Our Response

## 2.1 Background

Freeview strives to be accessible to everyone. It is the most-watched TV service in the UK, and as a free-to-air service is popular amongst all types of TV viewers, including individuals with a wide range of accessibility needs and all demographics. Digital UK has particular obligations to support accessibility on the DTT platform by virtue of its EPG provider licence and sections 5 to 13 of the Ofcom *'Code on Electronic Programme Guides'*.

Working to ensure that Freeview is accessible to people with visual impairments is not just a duty, it is strategically critical so that Freeview remains an attractive proposition for consumers. As Ofcom points out, an aging population means that the number of those with visual impairments is expected to grow from 1.8 million in 2008, to 2.3 million by 2020 and to more than 4 million by 2050[1]. We hope that, as today, a large proportion of those people will be Freeview viewers.

We are pleased that Ofcom is not just highlighting the issues of accessing TV for people with visual impairments but is working practically and pragmatically with the relevant interest groups and the TV service providers to explore how best to improve accessibility. We have found Ofcom's roundtable sessions on this topic to be very helpful in allowing people with visual impairments to show us how they use television, which in turn enhances our understanding. We have since met with the RNIB who have provided further useful feedback and guidance, and with whom we look forward to continuing a productive working relationship first established through switchover. We would warmly welcome engagement with other interest groups who may further support us in this area.

While there are some inherent challenges to enforcing the availability of accessible equipment in a horizontal market, the structure of the DTT platform presents the unique opportunity for the development of a wide variety of Freeview equipment with different accessible features for the needs of different individuals. We see this as a key strength of the horizontal DTT platform in contrast to other platforms.

On the DTT platform any manufacturer may make equipment to the D-Book specification and can apply for a Freeview Trademark Licence to use the Freeview brand[2], and this allows a plethora of different products with unique selling points to thrive in the DTT market. It is this environment that has enabled the invaluable work of the RNIB to seed Text-to-Speech (TTS) functionality on the Freeview platform, and its adoption by brands such as Panasonic, Samsung, Goodmans and TVOnics[3]. As a result of this open market structure Freeview has become the leading platform in the UK for provision of TTS services ('talking EPGs').

In this market we can continue to play a supporting role, working with manufacturers and the Digital Television Group (DTG) to help develop specifications and encourage adoption of a variety of accessibility features on different Freeview equipment to ensure that the needs of all Freeview viewers can be met. To this end we will be

[1] Ofcom 'Speaking TV programme guides' 10 July 2014, pp7-8
[2]Subtitles are a mandatory element of the D-Book and hence are available on all DTT equipment. Audio description is mandatory for equipment applying for a Freeview HD Trademark Licence.
[3] The TVOnics box is no longer widely available.

including TTS, high contrast EPGs, and text zooming within the product guidelines for the new Freeview connected proposition currently in development.

Manufacturers are making devices for global markets in which IP connectivity and second screens are emerging as important complements to the linear TV viewing experience. This gives rise to exciting opportunities to create solutions to serve different needs. International interoperability and open standards will be important catalysts of innovation, and supporting international standards is an area where Ofcom can play a useful role.

We would finally note that the Digital UK and Freeview websites and the Freeview Advice Line are accessible, and provide helpful advice to those with particular accessibility needs. We provide further detail of the ways in which we support people with visual impairments in the Accessibility Statement available on our website[4]. This support includes a downloadable large print channel guide; a talking channel list; a textphone service; and links to websites that provide a schedule of audio described programmes and to the RNIB for advice on accessible equipment.

## 2.2 Areas for future development

As part of our engagement with this Call For Inputs, Digital UK and Freeview have reviewed the range of accessibility features for people with visual impairments on DTT and have identified five areas where we believe there may be opportunities to enhance the current provision on the DTT platform (and in some cases across other platforms).

Many of these topics have already been the subject of discussion with manufacturers and we recognise that adoption of these features is not straightforward, but would welcome the opportunity to work with interest groups and industry to review these five areas. They are:

i. **User interface contrast and typeface.** There are no common industry guidelines for user interface contrast options to help people with visual impairments (though RNIB will advise on such matters), and the existing guidelines on recommended typeface are now quite old and may benefit from updating. We would welcome the opportunity to discuss this with RNIB and the DTG Accessibility Group.

ii. **AD content identification.** Where the broadcaster marks a programme as being audio described it should be possible for the manufacturer to decode the broadcast EPG data in such a way as these programmes could be identified in the EPG. Helpful guidelines for this are contained within the DTG's 'U-Book' Part B on accessibility. AD programmes could be shown with an 'AD' symbol on the guide; highlighted in a different colour; have an audible beep or other sound so that a viewer scrolling across the programme would know it was audio described; or there might be a filter that allowed a viewer to see only AD programmes. To date manufacturers have tended not to use this signalling, at least in part as it is not a Europe-wide implementation. The DTG Accessibility Group may be able to explore whether there are ways of improving AD content identification for people with visual impairments.

[4] www.digitaluk.co.uk/accessibility_statement

iii. **Audio description (AD) volume control.** AD volume is set by the broadcaster. This means that the viewer is not able to adjust the relative volume of the programme and the AD which accompanies it. Future advances in object audio systems will allow the user to tailor the audio characteristics to suit their own individual preferences. This technology is likely to form part of a future DVB UHD system.

**iv.** **AD in the on-demand environment.** We hope that the experience of AD in the on-demand environment can match that of the linear environment, but recognise that there are certain challenges to ensuring that, for example, an AD button works with on-demand content. We will seek to explore this issue with Freeview Connected manufacturers as the product proposition takes shape.

v. **Use of secondary devices.** We are interested in exploring the ways in which complementary accessibility services can be delivered via secondary devices. For example, synchronised audio description via tablets and smartphones; or specialised control devices to help specific groups. These sorts of services might usefully support the viewing experience of the new Freeview connected service for visually impaired people. Technical development has been hindered by the lack of a standardised open interface (hence only manufacturer X can create apps for manufacturer X's televisions) and security requirements (to ensure that only validated apps or devices can control the television) and we would welcome Ofcom's consideration of whether more could be done to catalyse development of innovative third party accessibility services.

## 2.3 Next Steps

We look forward to engaging with Ofcom on the topics discussed in the Call For Inputs, and will continue to support the accessibility of Freeview for people with visual impairments by:

- Continued direct engagement with interest groups, including RNIB;
- Working more closely with the DTG's Accessibility Group to develop and review specifications for accessible features in equipment and encourage adoption of these features, including those described in 2.2 above; and
- Exploring the ways in which the new Freeview connected proposition might provide an opportunity for us to encourage adoption of accessibility features.

## 3. Answers to questions

We have responded to questions 7, 8 and 10 which relate to the accessibility of the Freeview TV service for people with visual impairments.

**Question 7: Do respondents consider that it would be reasonable to expect visually-impaired viewers to pay extra for equipment that allows them to use EPGs or substitutes for the same purposes as sighted viewers? If so, why?**

It may be inevitable that inclusion of additional functionality to support accessibility will make equipment more expensive for the consumer. This is particularly the case in the open free-to-air DTT market where such costs are not subsidised by a recurring subscription charge. As Ofcom acknowledges, TTS chipsets do carry a modest premium to chipsets without this capability[5]. Where margins are thin, which is often the case for standard Freeview set-top boxes, then any additional production cost will drive up the price. For higher-price and premium products, including Freeview TVs, we would hope that such costs are more bearable and can be more readily be absorbed. This has been demonstrated in the fact that there are more Freeview TVs carrying TTS functionality than Freeview set-top boxes.

**Question 8: Do licensors such as Freesat and Freeview see obstacles to using their leverage to require manufacturers to incorporate speaking EPGs in future versions of products authorised to use their brands, such as Freetime and Freeview Connect?**

We agree that the advent of the new Freeview connected proposition is a good opportunity to promote the adoption of TTS or speaking EPGs and will be including TTS, high contrast EPGs, and text zooming within the product guidelines for Freeview Connected.

For the reasons set out in section 2 we do not see that it is necessary or sensible to require all manufacturers to provide all types of access features for the wide variety of groups with particular needs since – for example - people with hearing loss, people with Alzheimers or dementia, people with manual dexterity issues and many others will each have individual sets of requirements that are best served by different manufacturers creating bespoke solutions for those different market segments. As noted above, the existence of open standardised interfaces will facilitate this kind of development.

**Question 10: What is the scope for connected platforms to avoid the need for specific TTS provision within consumer equipment by using cloud-based resources (e.g. speech files on a central server delivered to the device as required)?**

This example is an interesting illustration of the sort of accessibility feature that could be developed on secondary devices, as we discuss more broadly in 2.2 above. We agree that this area would benefit from greater attention collectively by the platform, manufacturers, DTG, Ofcom and interest groups to see if there might be ways of catalysing innovation.

[5]Ofcom 'Speaking TV programme guides' 10 July 2014, pp26