

**Title:**

Mr

**Forename:**

Edward

**Surname:**

Green

**Representing:**

Self

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

No

**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 a totally blind, Sky subscriber. I am of working age and employed. I am familiar with a range of assistive technology solutions under Windows, Mac, iOS and Androyd.

**Question 1:Do respondents agree with Ofcom?s initial assessment that apps for mobile devices have the potential to be useful for those people with visual impairments who feel confident using touch-screen technology and can afford a suitable mobile device? If not, why not? :**

Yes. These apps are of limited use, particularly where recording functionality is built in and you need to set a box to record while away from home. I agree with the usability points made by focus group users - they are not particularly intuitive as EPGs.

**Question 2:Do respondents agree with Ofcom?s initial assessment that apps for mobile devices are less likely to meet the needs of the majority of visually-impaired people who are 65 or older, both because they are less likely either to**

**own a suitable mobile phone and because touch-screen apps present a number of actual and perceived barriers to use. If not, why not?:**

I'm not sure that their usefulness is limited to older people. Many younger blind people simply are not confident in using a touch screen and do not wish to do so. I believe that they should not be required to do so in order to access an EPG for which they are paying (even Freeview viewers pay the licence fee).

**Question 3:Do respondents consider that would it be reasonable for visually-impaired viewers to pay more than sighted viewers for the ability to use EPGs or substitutes for the same purposes as sighted viewers? If so why? :**

This would not be acceptable. The Equality Act 2010 ought to mean that providers offer the same level of service to blind and sighted customers alike. Asking them to pay for this accessibility as though it were a premium would set a dangerous precedent, and would discourage design-for-all type initiatives where these issues should really be considered when designing EPG equipment, not as a retrofit or afterthought. There is also no incentive for providers or manufacturers to keep costs down if they are going to be passed onto the consumer.

**Question 4:Do respondents agree with Ofcom's initial assessment that the speaking EPGs integrated into TVs and set top boxes may be easier for people with visual impairments to use than touch-screen apps? If not, why not? :**

Yes. An integrated EPG in the TV or set top box would be much easier and far more streamlined. Ofcom missed a key advantage in the consultation document: it is simply annoying to have to use another device when you don't have to - have I remembered to charge my phone? If I haven't, is there a plug socket where I can comfortably use it in proximity to the TV? Is there a charger to hand? People operating their TV through their remote control seldom have to worry about this, I have been a Sky subscriber for over a year and I believe I am yet to change the batteries in the remote.

**Question 5:Do pay TV service providers such as Sky, Virgin, Talk Talk and BT TV see additional obstacles that would prevent them from committing to including text to speech capabilities in the next planned upgrades to the receivers they offer to subscribers? If so, what are these obstacles? Absent regulation, would these obstacles make it impossible on commercial grounds to commit to the necessary investment?:**

Their own laziness and inertia.

**Question 6:If the cost of providing speech-enabled receivers to all those who subscribe to particular pay TV services would entail a substantial delay to the roll-out of such receivers to all subscribers, would it be feasible, quicker and more cost-effective to offer suitable equipment first to viewers with visual impairments?:**

This needs to be offered to all, not just to the subscribers the companies believe to have a visual impairment. I have not declared my visual impairment to Sky, as I can operate my account online and don't require sighted assistance to set up the Sky box given the constitution of my household. It should therefore be offered to all subscribers, with a chance for those who are visually impaired to come forward and request one at that point.

**Question 7:Do respondents consider that would it 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? :**

**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?:**

**Question 9:What are the main types of cost that pay TV service providers would face in incorporating speaking EPG features into the next generation of their set top boxes?:**

**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 presupposes that users will have an Internet connection. Older people are less likely to use the Internet, and I imagine that this is only exacerbated when talking about older people with a visual impairment.