

Title:

Forename:

Surname:

Name withheld

Representing:

Organisation

Organisation (if applicable):

Macular Society

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:

The Macular Society is the largest member-based representative body in the UK with nearly 15,000 members. Macular related eye conditions represent over half of all sight loss in UK and it is estimated that around 600,000 people are affected.

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, but this has to be put in context. Whilst some of the people affected are younger, the vast majority are over 65 years old and the majority of this group do not currently use smart phone technology.

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?:

Yes. This is partly due to the average age being older, partly because many of the older population do not have adequate resources to purchase equipment and partly because there is a great lack of appropriate training in this area.

Question 3:Do respondents consider that it would 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? :

No, absolutely not. This is totally contrary to the ethos of the Equality Act and would be a very dangerous precedent to set. Vision impaired viewers are paying the same subscriptions as everyone else so they should be receiving an equal service and equal access to that service.

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. As long as the implementation of this technology into the boxes is carried out well and in consultation with appropriate user groups, there is little doubt that speech facilities built in can be extremely effective and, for the majority of the Society's members, simpler than the use of apps on mobile technologies.

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?:

It would be impossible for the Society to best guess what the providers perceive as the obstacles to the implementation of such systems. It is, however, clear that the main likely barriers are hardware cost and the development/research time that implementation would involve.

All private companies are focussed on profit and anything that diminishes profit is likely to be viewed as negative. This perspective, whilst understandable, does not take into account the potential market for increasing sales of well designed and accessible equipment. If products were designed to appeal to the widest possible market, the increase in potential sales is substantial.

As to whether the above barriers are sufficiently significant to prevent providers making progress in this regard, it is clear that, if one company such as Panasonic can do it, then it is commercially viable for all the others to follow.

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?:

It depends on what equipment was to be handed out. If this required development itself, it would be preferable to adopt a policy of universal design of the mainstream equipment and to develop equipment which works for everyone rather than developing 2 separate approaches. If however, existing equipment is already available to fill the gap, it would potentially be an acceptable stop-gap approach to issue this equipment until such time as the mainstream equipment has been developed to cope with the needs of all viewers. This would need to be done at the providers expense and not that of the end customer.

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? :

No, absolutely not. If you pay the same fees as sighted viewers, you should expect access to the same level of service as everyone else, including access to the equipment that delivers the service.

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?:

The Society cannot speak on behalf of the licensors in this regard. However, it is probably reasonable to think that anything which might discourage agencies to licence these facilities might have a negative effect on profits and this could be seen as a possible barrier.

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?:

Again the Society can only guess at the likely costs but it would appear that the main costs would be the cost of the speech chip set (not expensive in real terms) and the research and development costs. The flip side of this argument is the fact that they would be potentially offering a much more attractive product to a lot of people - what increase in their market share might occur if they implement this well?

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)?:

Whilst this solution may be entirely possible from a technical perspective, there are several problem areas which may occur. Delivery of audio prompts from a web location is likely to result in a much slower and less responsive system than one which is incorporated in the local equipment. It also relies on both a good broadcasting connection and a good internet

connection at the same time. In many rural parts of the UK, the internet connectivity is extremely intermittent and slow which would result in an unpredictable service. This approach would still involve an amount of development work in any case - it is the Society's belief that this effort would be better directed at the more robust solution of speech being incorporated into the local equipment. It should also be born in mind that many older people simply don't have internet connections so this solution would not work for them in any case, unless it was possible to deliver this service entirely via the broadcasting system .