

Title:

Forename:

Surname:

Name withheld 12

Representing:

Self

Organisation (if applicable):

Email:

What additional details do you want to keep confidential?:

Keep name confidential

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

Email addresses

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Additional comments:

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, I strongly agree with this assertion as this is a relatively easy way to make EPGs accessible. They are cost effective which means there is more of a chance that they will be developed in the first place. In fact, I currently use Virgin's tv anywhere app on my iPad with VoiceOver enabled to control my TiVo box.

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?:

Maybe, although it seems to me that an increasing numbers of this age group are becoming tech aware.

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, why should we? The technology for synthesised speech already exists and already makes some existing EPGs accessible with no extra cost being necessary. I guess if the Apps had to be adapted in some way then a small charge for the app would be ok.

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? :

That depends, there would obviously be more of a hardware cost implication by using this route. Which would have the affect of limiting the choice for VIs. Previously anything requiring this kind of adaptation has always limited consumer choice and has usually been accompanied by a price increase disproportionate to the adaptation necessary to the product. Most often these products are of relatively poor quality with an inflated price tag.

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?:

I suspect they would say that it would, whether that is true remains to be seen but without regulation to insist that they make provision in this way then it is a certainty that they will not bother to do it.

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?:

Yes it would, but commercially this would not happen because the production runs would still be the same and it would take time, effort and therefore have a cost implication to seek out which consumers are VI.

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. For the feature to exist the economy of scale would only be cost effective if it was designed into the next generation of boxes, therefore it would be in all the new ones so why should VIs pay more?

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?:

I don't know but at present I can't see any reason that they would bother to do this.

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?:

Software development. At present all boxes send an audio output to the TV so it would only need the software to tell it to speak what is already on the screen.

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)?:

That may work but I doubt it would currently be reliable enough as if you had a point of great demand it would probably slow the system too much.