

Title:

Forename:

Surname:

Name withheld 15

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?:

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Additional comments:

Most of your individual respondents are likely to be visually impaired, but you use a spam-prevention tool which actively discriminates against blind and partially sighted users!

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 apps have a high potential for use by blind and partially sighted people, as long as they are designed, built and tested correctly. Blind and partially sighted people should be involved and their feedback acted upon at all stages of app development. There are many areas of life where a smartphone and well designed apps are used by blind and partially sighted people. However this should not be used as an excuse to avoid providing accessible interfaces (program guides) on TVs and set-top boxes.

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?:

No - I find that almost all over-65 people can become adept at using these devices with adequate one-to-one training. Many people require follow-up support, not simply a few minutes with an instructor or an on-line video tutorial. Many over 65 people have access to smartphones handed on by family members upgrading. Some blind or partially sighted people do not have access to or skills with a smartphone, include people both under and over 65.

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? :

Absolutely not. This would be a breach of the Equality Act, since the television / electronics companies would not be providing a service to blind or visually impaired customers and charging more purely on the basis of their disability.

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? :

It depends how well the speaking EPG is designed. Apple TV has a good speaking option. Many pieces of software / kit are designed so badly that they are unusable by blind/partially sighted people.

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?:

BSkyB are a huge company and part of an even larger corporation. It can clearly afford the development and licencing costs of Text-to-Speech but lacks the incentive to provide it. Text to Speech Software is increasingly available and cheap, and provided in small, cheap electronics as a matter of routine. There is no reasonable excuse for not including a fully functioning Text to Speech upgrade to Sky's Sky+ / Sky+HD boxes.

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?:

The changes to Sky+/Sky+HD boxes would presumably be software only. If necessary, the upgrade could be downloadable on request if the user selects Text-to-speech as a user option, similar to Audio Description. It is standard for content and software to be delivered across internet connections already.

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? :

This is entirely unreasonable and a breach of the Equality Act. If such a scheme were introduced, why not make hearing-impaired customers pay extra for access to subtitles/signed program content?

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?:

This is something which should be enacted into legislation/regulations rather than left to pressure on manufacturers. Text to Speech facilities are now very common, widely used and cheap to implement.

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?:

We do not need to wait for the next generation of boxes. This should be an upgrade for current boxes and mandatory for future generations.

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 is probably a more expensive and clumsier option to design than just installing TTS software where needed!