

**Title:**

**Forename:**

**Surname:**

Name Withheld 24

**Representing:**

Self

**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:**

**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? :**

Apps for smartphones which offer a so-called alternative to TTS which is built-in to the set-top box or other TV equipment may be helpful to only a limited group of visually-impaired TV viewers who meet all of the following criteria, that is to say who:

- are wealthy enough to purchase an expensive smartphone device,
- can afford the on-going cost of the broadband / wifi / 3G/4G services which they depend on,
- have the technical knowledge and skill to choose, understand, set up and use these smartphone devices and communications services,
- can gain access to a range of informed consumer information in an accessible form, and the opportunities to browse and shop for these devices and services,
- have the physical dexterity, cognitive ability and aptitude to navigate the complex user

interface (often relying on touch) which is required.

The overwhelming majority of blind and partially sighted people in the UK fail to meet one or more of these criteria because of their relatively low economic status, their disability, social isolation and limited technical ability.

Smartphone apps are therefore not an adequate substitute for the majority of VI television viewers.

**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 agree with this assessment in-so-far as it goes. However, based on my own personal experience, and based on reading Ofcom's Consultation Document, I cannot see why this assessment is limited to people who are '65 years of age or over':

In my view, apps for mobile devices are less likely to meet the needs of the majority of visually-impaired people of all ages, including those under 65.

I myself am in my 30's. I could if absolutely necessary afford a smartphone (though why should I have to purchase this device in order to watch TV?). The fact that I am submitting this response online indicates that I have a degree of competence with technology.

And yet, for all of this, I do not own - nor do I want to own - an expensive, touch-based, smartphone device.

Nor do I wish to use such a device in order to interact with my TV.

I - and many other blind people like me of a similar age - want to just be able to switch on the TV, sit down on the sofa, and start watching it - just like everyone else can. This includes being able to use a (talking) EPG to choose what to watch.

Ask yourself: would it be acceptable to the average (fully sighted) consumer that in order to use their TV, they have to own, pay for and interact with a separate device? Of course not.

**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? :**

No, it is not reasonable to expect blind and partially sighted people to pay an extra premium, or to pay extra for additional equipment, simply in order to make use of a universal service like TV.

Blind and partially sighted people are, in the main, already severely economically disadvantaged. They are typically unemployed (including those under 65) or retired. They have very little discretionary income to spend. It is not reasonable because it is not

affordable.

On the other side of the coin, built-in TTS is now, without question, cost-effective and technically feasible for large TV equipment manufacturers to incorporate, as standard, into all of their equipment. What is missing on their part is the will to do it. This is because they have no incentive - commercial or regulatory - to drive them in this direction.

The low cost and increased commercial availability of TTS software and hardware has brought it easily within reasonable reach. Many manufacturers have proven this- Panasonic and Samsung within the mainstream TV equipment market, but also Microsoft on the desktop PC, Apple across its entire range of smartphones, tablets and MP3 players, Nokia in some of its smartphones, Pure in one of its DAB radios, and just about every GPS device manufacturer. Not to mention specialist TV set-top-box manufacturers such as Goodmans and TVonics.

There is also a question of corporate social responsibility involved. Even if there is a very small additional unit cost of including built-in TTS as standard to every TV and set-top box, to do so is the socially responsible thing for manufacturers to do.

Doing so avoids the need for individuals and families to replace equipment when someone in the household starts to lose their eyesight, since equipment they already own will already have the functionality to adapt to their needs. This is an increasingly important consideration as our population ages.

Doing so will also avoid the environmental costs associated with the unnecessary waste when equipment is unnecessarily replaced.

I would like Ofcom to put in place the regulatory incentive to drive equipment manufacturers to include built-in TTS into all TV and set-top box equipment as standard.

Once this is accepted as standard practice, the industry will not look back. Indeed, it may lead to greater levels of access and social inclusion for VI people as more services are delivered through televisions, such as government services accessed through the internet on capable TVs, which could be made accessible by extending TTS beyond the EPG.

It may also lead to greater commercial opportunities to TV platforms as more of their services could, more easily, be made available to VI viewers by extending TTS support beyond the EPG.

**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, I agree with this assessment. This is true for all blind and partially sighted people, of what ever age.

**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?:**

**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?:**

**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)?:**

Please note that this model would require consumers to have access to the necessary broadband / WiFi / 3G/4G data services to enable the transfer of speech files and other associated data between the consumer's TV equipment and the platform's central server.

This should not be a requirement of facilitating access to TTS which is built-in to every device.

Consumers should be able to access TTS on their TV or set-top box without this being conditional on purchasing or already having access to additional data services. FreeSat or FreeView, for example, should be free to viewers and not contingent on having additional services.

There are also privacy concerns which are not adequately understood, concerning the amount of data which a two-way interaction between consumer and platform provides to the platform about the user, in terms of the platform monitoring the viewer's TV habits etc.