Title:

Mr

Forename:

Sean

Surname:

Randall

Representing:

Self

Organisation (if applicable):

What additional details do you want to keep confidential?:

No

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

None

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Additional comments:

I am a totally blind person, and live in one of the 123,000 households in the UK including people with severe, mild or moderate sight loss that do not include a sighted adult. Our household is comprised of myself, my blind fiancee and our sighted three-year-old daughter. I work part time as a college administrator and part time as an Access Technology instructor whilst developing computer software and access solutions on a freelance basis to members of the public and organisations who seek to comply with legislation or employ disabled people.

I have used Sky and Sky+ (both with and without the Sky Talker), a variety of Freeview, Freeview HD and Freeview+ boxes and televisions and now use the TVOnics set-top box first mentioned in paragraph 3.4 of the consultation. I am a confident technology user and have an above-average understanding of the technology landscape.

I have therefore offered responses to the second set of your questions, as well as the first,

primarily to have an open, enthusiastic and disabled viewpoint on them which you are less likely to receive from TV service providers, manufacturers and technology providers both because of the paucity of disabled people they can front and their natural vested interest not to spend money without an incentive for financial gain.

Finally, I would just like to point out the gaping chasm in accessibility between the box I use (with software modified especially for the blind) and the slapdash, half-hearted access others get with bolt-on hardware, marginally accessible apps, or the occasional spoken menu. My box started out as a mainstream product with no special emphasis on blindness, and yet it is currently the most accessible and feature-rich free-to-air freeview+ HD receiver on the market for a blind person and is no longer being supported! This is not only a silly state of affairs but an untenable one. Apple have blended a fully-functional accessibility package into their mobile devices. Sighted people may know this or they may not, but it doesn't interfere with their use of the devices. It does mean that, if I pick up any iPhone, I can use it. This is the adoption needed in the EPG market. There needs to be a clear standard for turning speech on or off, a simple method (like Apple's "tripple-click home", now adopted by android, amazon and others) and a blending of the technologies so that blind people are not forced into having specialist provision. The technology is already here, today - it is entirely possible that a computer programmer developing software for a set-top-box or TV made it speak for his own personal use and stopped it doing so before an official release, the ability is that easily in reach. The ideal is any box or any television can talk, even if 99% of them won't need to. It's already happened with 100% of the iPhones, iPads, iPods, Apple Macs, Windows Computers and Android Tablets and smartphones on the market. Cars are no longer manufactured without seat belts. Landline telephones are no longer manufactured without a raised bump or tactile referent near the number 5. Two extremely different products, with features for different purposes: can we not find the midpoint between these two extremes and, as blind people, finally have unfettered and equal access to EPGS? 96% of viewers frequently used the EPG in 2010. almost haf a decade on, isn't it about time someone in authority ensured we blind people can be a part of that, too?

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? :

Undeniably, but apps are not made for blind people and should no way be treated as a substitute for access to the device first-hand (see my answewr to the next question for more detail).

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. Although we do not own equipment to take advantage of an app at present, if we did we would undoubtedly use it (both at home and remotely to set recordings, if possible). However, as a houshold we are very able, technologically speaking (we use apps for everything from identifying groceries to finding bus timetables and bed time stories). The app

is endemic to our lifestyle, due to our age, background and equipment. but of course this is far from true for the majority of blind users. I feel as if providers are using the App as a "get out of jail free" card, where the onus of text-to-speech and manipulating the user interface is instantly taken out of their hands and placed on the shoulders of a device or operating system manufacturer.

I believe that the App will be a growing concern and used even more widely than it is already, but as you point out in section 3.23 of the consultation the primary audience for the Apps is the sighted market. Of course it is important for apps to follow accessibility standards and guidelines, which is evidently not being done at the moment, but even resolving that situation wouldn't provide a comparable experience to the visually impaired when using the EPG directly.

It seems to me that manufacturers are now clearly breaching OFCOM's EPG guidelines, because your own consultation proves unequivocally that "such adjustments" (i.e, the incorporation of text-to-speech) are now well beyond "reasonably practicable", given the costs and availability of such text-to-speech systems (see the consultation, section 4.2). It seems obvious to me that OFCOM has a duty to call for improved accessibility in the EPG arena and I applaud you for consulting in an open and accessible way.

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? :

I don't believe it is fair that blind people should have to pay more for this. Nobody manufactures mainstream television equipment without having a sound financial backing, and I therefore think development costs of introducing and supporting accessibility features should be absorbed by manufacturers, licensors and broadcasters. Possibly an allotment from the TV license could be set aside to encourage such a drive, rather than taking it out of the limited finances of the majority of those who it would assist, that seems a not unreasonable request. Blind people were not expected to pay more when the audio description service launched, and the prevalence of the chipsets that allow AD is now such that most televisions and set-top boxes include the feature (indeed in some cases it may be more expensive not to).

It seems to me that the sheer variety of text-to-speech resources on the market, in Service, software and hardware form (although hardware is a very backward way of progressing, realistically speaking), combined with the relatively narrow field of middleware applications and expertise of manufacturers in-house teams should already be fostering text-to-speech systems on these devices and the only reasons for their lack is an unwillingness to be bothered and a lack of people willing to push it through or test or trial the results.

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. Touch-screens are brilliant for blind people to use with the right training and support. However, even I as a regular touch-screen device user control my television with a standard remote control. The TV remote is part of the television experience and it provides consistent and comfortable control for all concerned. Remotes are by their nature quite tactile, and

people can be guided on their use verbally by relating shapes, colours, and variation in buttons. I'm not saying that they are the best method of control, but they are the norm and the standard. If you buy a TV or a box, you get a remote with it and I think it's not only reasonable but vital that a blind person with enough dexterity is able to make as much use of it as any other user.

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?:

Although I am not affiliated in any way with any of the specific targets to these questions, I wanted to voice an opinion. Specifically on the matter of the necessary investment. Virgin mentioned in 2011 that it could take "3 years or so" for text-to-speech on its range of boxes to be provided and contrasted an app for a smartphone as an alternative. Your consultation and my own thoughts have found the problems with apps for the majority of blind people, but those 3 years have since happened with apps but nothing more, and even the apps aren't as accessible as they could be. This is quite shoddy, isn't it? what would the country say if they were told that they'd have to wait 3 years for on-demand services on television but they could catch up on their phones? Everything can be made to talk, and many things with a navigable user interface with a menu structure and lots of text (computers, phones, tablets, eReaders,, whiteboards, ATMs, exercise equipment, vending machines, sat navs) are all doing it well, or to a degree. The only field in which this is failing to happen is the one we all relax in at the end of the day, and the technology (the modules for speech, the code in middleware or flexibility in existing in-house software) is already there. What's missing is motivation and willingness, and I defy any provider to come back with technological issues that stand up to any form of scrutiny. They will tell you it's not cost-effective or that it is not possible without sufficient manpower or heavy reworking - claims OFCOM are unable to effectively disprove, yet claims which cannot, must not, have no logical, technological or rational basis for being upheld.

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?:

There is no technological reason that all current PAY TV boxes on the market cannot have their software updated to provide text-to-speech capability. An over-the-air update may not be sufficient and the worst case scenario would require direct access to the box's internal memory, but my point is that all the hardware needed (a powerful enough processor and sufficient memory, audio output capabilities, the receipt and interpretation of remote control signals) is already present. Logically, therefore, when the software is in place, all new boxes can be produced with it included at no extra cost. There's no physical change to the components, just the applications running on those components.

Rolling out to a test group of disabled customers would be a cost-effective way of testing the

changes before they made it into the next generation of boxes. I am sure that, at least one of the current pay TV services would technically be able to make their boxes speak with purely a software patch (installed via a cable, or wirelessly). It is these providers who would best be served by targeting disabled peple first, as with guidance and a technologically aware test group, the software could be installed independently and no engineers need be paid for travel or service work.

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? :

I would hope that any official respondent would wish to retain viewers and so answers this question in the negative. Tim Cook, CEO of Apple, has been lauded in the press of late for his commendable views on accessibility and it is to his comments that I would direct any respondents in the television industry as a guiding attitude to embrace in their own organisation.

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?:

Even I as a blind individual can see a problem for licensors, inasmuch as by requiring speaking EPGS manufacturers may find a suitably skewed cost analysis or inflationary developer and decide to develop for another platform. It is unfair, I think, to force this purely on licensors. OFCOM should mandate whatever they are going to equally for licensors and the pay TV sector and give serious consideration to remuneration for those manufacturers who seek to implement the recommendations so that licensors can feel comfortable making such a requirement without the threat of losing suppliers.

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?:

Looking from the outside in, it's development. I have already outlined in detail the availability of the appropriate hardware, software libraries and such. These may have a cost component to them, although given the robotic quality of the Sky Talker and its enthusiastic uptake, service providers need not feel obliged to spend heavily on "natural-sounding" text to speech systems if the overhead will be significant.

To me the implications seem primarily developmental: developers have little experience of access features other than those that they can directly use and play with (high contrast, inverted colours, enlarged text). Text to speech is a largely unexplored area, and unfortunately having a huge financial empire doesn't lessen the fear of the unknown which we all feel.

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)?:

I have yet to see any refutation of my opinion that cloud services are useful for hardware that cannot by itself support the processing needs of the job. Speech Recognition is a good example of this - Apple's Siri sends the speech to its servers for processing, rather than getting the device in your hand to do the heavy work. TTS is by no means that powerful or intensive and I think introducing a complicating factor like cloud-based synthesis is needlessly adding cost to little benefit.

Whilst immediate results might be quicker to obtain, a whole second set of technologies need to be in place (broadband Internet, for instance), with recurring cost to the developers for cloud access and guaranteed uptime service of the cloud provider as wel as the hardware in the user's home, a factor too unpredictable to even consider given the current state in TTS technology.