

Organisation (if applicable):

RNIB (Royal National Institute of Blind People)

Additional comments:

Question 1:Do consultees agree with the proposed approach to setting audience share thresholds for other EU Member States? If not, do they have practicable alternatives that they would like to propose, which would be comparable with the approach taken to domestic channels:

Yes we agree with the proposed approach to set audience share thresholds.

Question 2:Do consultees have any comments on whether the approach taken to assessing the costs faced by domestic licensees is also appropriate to non-domestic licensees? If so, what alternatives would they propose, and why:

we agree that the approach taken to assessing the costs faced by domestic licensees is also appropriate to non-domestic licensees

Question 3:Do consultees have any comments on how it is proposed to assess the cost of providing access services, including the provisional assessment of costs:

yes we agree with the proposed approach to determining a provisional assessment of costs for 2013 and 2014.

Question 4:Do consultees agree that non-domestic channels required to provide access services with effect from January 2014 should be permitted to commence provision in accordance with the targets corresponding to the first anniversary of the notice date:

yes we agree that non-domestic channels required to provide access services with effect from January 2014 should commence provision in accordance with the targets corresponding to the first anniversary of the notice date.

Question 5:Do consultees agree that Ofcom should count language subtitling towards access service targets for subtitling:

we refer to the views of organisations representing deaf and hard of hearing people

Question 6:Do consultees agree that, for a transitional period of two years from 1 January 2013, broadcasters should be allowed the alternative of providing additional subtitling in place of signing, in order that they can have the opportunity to devise alternative arrangements that may be more beneficial to sign language users:

we refer to the views of organisations representing deaf and hard of hearing people

Question 7: Do consultees have any comments on the proposed changes to the Code on Television Access Services, as set out in Annex 3:

yes we agree with the proposed changes to the Code on Television Access Services, as set out in Annex 3

Question 8: Do consultees have any comments on the impact assessment (Annex 2)?:

No