

ACOD response to Ofcom's 2009 Review of Television Access Services

1. ACOD welcomes the publication of Ofcom's 2009 Review of Television Access Services.
2. The Committee has been fortunate enough to receive regular updates from Ofcom colleagues prior to the publication of this consultation, and we have welcomed this opportunity for input throughout the process. We look forward to this dialogue continuing and evolving.
3. In this response we would like to address the three main areas of the Review as well as highlight some of our other thoughts and concerns in this arena. Whilst some of these are outside the scope of the current review, we would nonetheless, like to take this opportunity to express our concerns.
4. In terms of the criteria for selecting which channels provide access services, we believe that this remains fit for purpose. The arguments presented in the review seemed to the Committee to be fair, reasonable and well supported with evidence.
5. ACOD welcomes the opportunity input into the review on the future of audio description provision. We believe that there is a case for recommending an increase in the audio description quotas to Government. Our preference, at this stage, would be for Ofcom to recommend Option 3, which would see an increase in the audio description quota to 20% for the 10 statutory PSB services. These channels would be required to reach 20% in annual increments of 2%. The 48 other channels required to provide audio description would continue to be obliged to audio describe 10% of their output.
6. Our second preference would be for Option 2. We do not believe that Option 1, no change in the existing regime, offers the best option for today's Older and Disabled citizens and consumers as we believe that pursuing the status quo could stifle the growth of Audio Description – an access services which we believe would benefit from increased quotas and profile (which will in turn, also drive consumption). We will say more about this later.
7. Given the proven popularity of subtitles to a wide range of audiences we would encourage broadcasters to continue to ensure that subtitling efforts are focussed on the most appropriate programmes and that they – along with Audio Description – can be found across a broad spectrum of output.
8. We also believe that it is only right and proper for PSB services to lead the way in access provision, and therefore Option 3 feels like the most appropriate of the three options presented to us in the Review.
9. ACOD notes that Video on Demand falls outside the scope of the Review but we hope that PSB broadcasters will continue to explore how access provision can be delivered via these services. As a means for consuming TV like services VoD usage will only increase, and it is important that Older and Disabled audiences are able to enjoy the benefits of on demand viewing as much as other demographics.

Therefore, this remains an area the Committee will continue to watch with interest and we would urge Ofcom to continue to work with broadcasters to ensure that a full portfolio of Access Services is made available to audiences, whatever the platform they choose to use.

ACOD notes, and commends, some of the good work done in this arena by Channel 4 and the BBC. We hope that others will follow their example and that these two providers will continue to roll out and develop their access service provision.

10. In a similar vein, we note that under the current criteria for selecting which channels provide access services, those which primarily focus on BME audiences will fall outside of this scope. ACOD understands this, but is concerned that in particular older and disabled consumers of these services – many of whom will have English as a second language, and who may not consume much PSB content as a result – will be deprived of any access provision.

As with broadcasting in the VoD arena, we would therefore encourage Ofcom to work with broadcasters targeting BME audiences to see if they can voluntarily provide a greater provision of Access Services than at they do present. We believe that this could have consumer and business benefits for this small, but important, audience and would therefore welcome any developments Ofcom could facilitate on this front.

11. The Review proposes to investigate whether the current exemption from providing access services which is applied to channels targeting areas outside the UK should be re-examined. We agree that it should be re-examined and that requirements for broadcasters should be the same as those targeting the UK.
12. In addition to the above points ACOD has a number of other areas of concern which would like to highlight focussing on Signing, Subtitles and Audio Description. As previously stated, these fall outside of the scope of the current review, but we would nonetheless like to take the opportunity to put our concerns on record.
13. Earlier in our response we outlined our recommendations for proposals to change the quotas for audio description. ACOD recognises that compared to subtitling this is still quite a nascent technology and that many potential users either do not know that the services exists, or are – for a variety of reasons – yet to use it. Similarly, we also recognise that some consumers will have tried audio description and decided that it was not for them. We believe that the step change in activity that we have recommended will enable the service to continue to mature and reach a wider audience. This will be of benefit to many older and disabled people and would therefore be welcome.
14. However, in addition to an increased quota ACOD would also like to see a greater promotion of audio description services on an on-going basis. We noted with interested the results of the recent awareness campaign and the short-term benefit that it brought in terms of increased awareness. For this benefit to be fully realised, and for audio description to become engrained in the consumer consciousness the same way as subtitling has, it will require a combination of both time and regular promotion.

We would encourage Ofcom and the PSB broadcasters to invest in as much awareness raising activity as possible. This will be particularly important if the quota for audio description is increased so that this extra effort on behalf of the broadcasters is matched by increased consumption of these services.

16. Furthermore, we also think that consumption of Audio Description services could be aided by more intelligent use of EPG's which at present do not highlight the presence of audio described content perhaps as best as they could. Using audio 'aide memoirs' such as an audible bleep or an on screen/menu symbol are just two ways in which this could be achieved. At present we are concerned that technology does not always tell consumers as easily as it could when audio description is available and as a result some audience members who would like to use this service are missing out. Therefore more obvious and easily discernible ways to identify when programming is support by Audio Description would be of real benefit to many older and disabled consumers.
15. On a different note, the Committee has, on a number of occasions, noted their concern about the quality of subtitling content on TV programmes. This is especially the case on programming of non-UK origin. Some stakeholders have also noted that the location of subtitles on screen varies depending on which platform you are using. Where possible we would encourage Ofcom and Broadcasters to try and ensure that there is a consistent user experience.
16. Lastly, we would also like to flag our concern about the on-going viability/appropriateness of the Sign Zone on the Community Channel given that this service is being slowly phased out from Freeview/DTT as Digital Switchover progresses. ACOD believes that the creation of the Sign Zone was a very welcome initiative and we are keen to ensure that it is as successful as possible. Therefore, given changes to the transmission outlets of the Community Channel we are keen to ensure that the Zone has the right broadcast platforms available to it. This is a situation which will clearly need to be monitored on a regular basis and we would welcome any initiatives which ensure that it remains fit for purpose.
16. Finally, we would like to reiterate our view that this Review is a very valuable document. We believe that the Access Services have the potential to add real value to Older and Disabled People's enjoyment of TV Broadcasting, and we thank you for the opportunity to respond to it.

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