

Question 1: Which of the three options do consultees favour, and why?:

Option 3. Your research clearly says that Option 3 is "over 5 times more effective than Option 2 at delivering viewer benefit" and that option 2 is "not very efficient".

It makes complete sense that public service broadcasters should be required to meet the fullest Audio Description quotas - perhaps even beyond the 20% level which Ofcom is proposing. The provision of access services is a 'public service' by definition - an increase in the requirements on the PSB channels would not only result in considerable extra provision, especially on Freeview, where it would benefit most viewers, but I would expect that this would also encourage additional voluntary provision by non-PSB channels, both for reasons of competition and as a result of the increased availability of skilled audio describers and the increased secondary market for sales of existing audio described programming which would eventually make its way onto the cable channels. In turn this would lower the costs which would make it affordable and bring more channels into the requirements to provide the service.

In fact I believe that the best option would be somewhere between options 2 and 3. PSB channels should be required to provide the highest levels of audio description as this unquestionably provides the greatest public benefit. A point which does not seem to have been accounted for is that audio description hours on public service channels are inherently more valuable to visually impaired viewers than equivalent hours on cable and satellite because PSB channels transmit a far higher amount of original programming, compared to cable and satellite channels which are largely made up of repeats.

But this should not let cable channels off the hook - 10% is not enough as most channels could make this up with a single series. The requirements should be increased for those channels which can afford it. 20% on these channels, and more still for the PSB channels.

Question 2: Do consultees have any further suggestions for future access service provision? If so please provide the rationale for these suggestions:

Too many channels are excluded from the requirements on the basis of faulty reasoning. For example, that news channels have continuous commentary which does not make audio description practical. This is not true as nearly all news channels feature recorded programming at half-past the hour, and these programmes could be easily audio described. Music channels are excluded because music cannot be audio described - but many of the "music" channels show normal recorded entertainment programming which would be required to be described on other channels. These blanket exemptions are misinformed and should be removed.

I also believe that all Freeview channels, or at least the main five if nothing else, should be required to broadcast audio description in an open format that can be received by ALL receivers - i.e. via the language/soundtrack menu that would normally be used to select commentaries in other languages - as this would have great benefit to the millions of visually impaired households who have already paid to go digital once and cannot afford to change their equipment again. Freeview televisions and receivers which work with audio description are still a tiny tiny minority. A second soundtrack should be made available in a standard format which all equipment supports - possibly using the unused French or German

soundtrack options if it comes to it. This service must be available to ALL and not remain a 'hidden' service with little awareness or benefit.

Comments: