

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

Sense Scotland favours Option 2, increasing the audio description quota to 20% for all channels required to provide access services. We would prefer to see an earlier timescale to reach 20% but accept the 2% annual increments.

Following the Communications Act (2003) broadcasters have been required to produce 10% of television programmes with audio description. This has limited blind and visually impaired people's access, understanding and enjoyment of television.

Since the last review in 2006 technological changes have been rapid. One result has been a massive increase in the market penetration and power of mobile devices on which to access broadcasting. It is essential that enhanced access opportunities allow disabled people to benefit from these developments.

As BS 8878 (formerly) PAS 78 will soon introduce new standards for web accessibility and as broadcasting and web access technologies converge, it will be important that improvements in one area – better web access – are not hindered by stasis in the other – access to broadcasting.

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

a) do we need to re-examine the criteria for selecting TV channels required to provide access services?

Criteria should be kept under constant review. There are historical anomalies where for example the Disney and Cartoon channels were exempt but already provided a high percentage of accessible programme making. At the same time many channels that broadcast a high percentage of archived programming, chose not to improve their accessibility, despite having had ample opportunity to do so.

c) should the current exemption from providing access services applied to channels targeting areas outside the UK should be re-examined in the light of changing circumstances?

Yes the current exemption should be re-examined. All channels that are UK-based and targeting areas outside the UK should have to meet improved accessibility criteria. Of the channels broadcasting outside the UK but based in this country, around 200 broadcast mainly to Europe. Given that there are parallel developments in EU legislation to address improved access, the UK should not offer a 'safe haven' for such companies to broadcast without having to meet criteria applying to broadcasters in this country.

Comments:

Many people who are deafblind would benefit from larger sized fonts, especially as there is currently no facility to increase the subtitles on digital teletext. We are aware too that some programmes do not conform to the minimum number of display lines (24). This should be enforced. We would encourage Ofcom to commission research into subtitles that can be user-adjusted. The ability to vary the size of subtitles would improve the quality of experience for many people who are deafblind.

Subtitles should be presented in a black box and avoid the practice where some subtitling appears on a greyed, or transparent background, which is far more difficult for people with visual impairments. As viewers can choose whether to turn subtitles on (although not always straightforward), their presentation should be as accessible as possible to people with visual impairments.