

Brief Response to the Ofcom Consultation

Signing on television – proposed changes

From the Deaf Studies Trust, Vassall Centre, Gill Avenue, Bristol BS16 2QQ

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In summary

We agree with the concerns of OfCom in regard to viewing patterns by Deaf people and can offer data which indicates that there are very few viewers for current interpreted television programmes. We believe that there is a demand for a Deaf-led channel which would provide its content in sign language with subtitles as necessary.

We consider that there is a further delivery option which is becoming more relevant to minority programming as a result of Broadband Internet access and its exploitation by major broadcasters and this is the development of an Internet channel with sign language content. This can be partially integrated into mainstream provision by parallel programming or can offer a wide range of innovative IPTV. A baseline insight into this can be gained from the existing Deaf Station (www.deafstation.org) which has been providing daily news and information in sign language since 2003 and which has over 2000 registered users.

We believe that all broadcast television operators, regardless of size of audience should make a proportional contribution to access for Deaf people; however, we agree that this need not be by production of television programmes on a regular or irregular basis, but could rather be more beneficial if a levy was made according to audience size. Such a levy would allow the creation of SignTV Trust to support the development of Deaf-led television programming.

Q1. Do consultees agree that these are appropriate policy objectives for Ofcom in considering possible alternative arrangements for signing on television?

We consider that the current provision for sign language on television does not meet the needs of Deaf sign-using population in the UK. We agree that it is reasonable that all providers of broadcast television should contribute to access and that this would apply to even those with low audience figures. However, we agree with the policy which excludes low audience channels from provision of signed programmes. Their contribution might be in the form of a levy to a central fund based on their audience size.

We agree that in the case of Deaf sign language users

“that their interests and needs would be better served by the provision of more sign-presented programming”

(especially

“at the expense of a significant

reduction in the amount of sign-interpreted programming)”

In effect we consider that all broadcasters should contribute to the solution even if they do not themselves produce more signed content.

Q2. Do consultees agree that Ofcom has identified appropriate options?

We consider that there is a further increasingly significant option of IPTV - or television content provided through the Internet. Since this delivery mode is being used increasingly by the major players in this area - BBC, SKY, even BT and the mobile phone operators, then it is reasonable to consider the possibilities for Deaf IPTV. Entry costs are significantly lower than for a pure broadcast TV option.

Deafstation (www.deafstation.org) has been providing daily news and information in sign language to Deaf people since 2003 and has over 2,000 registered users.

Q3. Do consultees agree with Ofcom's reasons for rejecting the ideas described in paragraph 3.18?

We agree with Ofcom's reasoning but would emphasise the need to have a statutory system for contribution to Deaf access through support for Deaf-led programming.

Q4. Do consultees agree with the proposals outlined in paragraph 3.32?

We agree that channels with less than 1% audience share can be excluded from requirements to produce signed television content, by themselves, but believe that they can contribute to a central fund to provide Deaf-led programming. We are not in favour of the requirement that they be asked to produce periodic programmes.

Q5. Do consultees agree that the aim should be to put any new arrangements in place from the start of 2008?

Yes

Q6. Do consultees have any comments on the impact assessment? Where possible, it would be useful for arguments about the cost of different options to be supported by relevant data.

We are not in apposition to comment extensively on cost but we do not believe that Deaf presented television should be more expensive than interpreted television - as the former has been in place in Bristol with both ITV and BBC for several years. However we do consider that an opportunity is being missed in not examining the options for Internet TV and the flexibility and innovation which it can offer.

Q7. Do consultees consider that the proposed revisions to the Code are sufficiently clear?

We consider the presentation to be clear.