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Mr

**Forename:**

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**Name and title under which you would like this response to appear:**

Head of Parliamentary and European Affairs

**Representing:**

Organisation

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RNID

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**What do you want Ofcom to keep confidential?:**

Keep nothing confidential

**If you want part of your response kept confidential, which parts?:**

**Ofcom may publish a response summary:**

Yes

**I confirm that I have read the declaration:**

Yes

**Ofcom should only publish this response after the consultation has ended:**

You may publish my response on receipt

**Question 1: Do consultees agree that these are appropriate policy objectives for Ofcom in considering possible alternative arrangements for signing on television?:**

Based on the findings of Ofcom's extensive research on the use of television access services, which was published in 2006, RNID believes that Ofcom have chosen appropriate policy objectives in relation to the consideration of possible alternative arrangements for signing on television.

However RNID is concerned by the statement in the Policy objectives (page 3, paragraph 1.12) which states "they should not have a significant impact on the amount of subtitling provided by broadcasters". RNID strongly believes that any changes to sign language provision should not compromise by any degree at all the minimum levels of subtitling that are currently set.

**Question 2: Do consultees agree that Ofcom has identified appropriate options?:**

RNID believes that subject to the need to meet the requirements of the 2003 Communications Act Ofcom has identified appropriate options. RNID also believes that Ofcom has been diligent in its consultation over the future of signing on television.

**Question 3: Do consultees agree with Ofcom's reasons for rejecting the ideas described in paragraph 3.18?:**

RNID agrees with Ofcom's reasons for rejecting the ideas described in paragraph 3.18. To drop the requirement to provide signing on many channels, without putting any alternative arrangements in place, would go against the express wishes of Parliament as expressed in section 303 of the Communications Act.

**Question 4: Do consultees agree with the proposals outlined in paragraph 3.32?:**

RNID welcomes the proposals outlined in paragraph 3.32. The exclusion of signing from public service channels would severely disrupt access to news and information for many deaf people. At the same time the decision to exclude smaller channels with an audience share of less than 1% seems a reasonable compromise in recognising that some degree of flexibility is needed following Ofcom's research into the use of access services.

The proposals should also lead to a much better balance between programmes with an interpreter and programmes which are sign-presented, the latter of which is currently far too low, yet are often the preferred option for many deaf people

**Question 5: Do consultees agree that the aim should be to put any new arrangements in place from the start of 2008?:**

RNID agrees that the new arrangements should be in place from the start of 2008.

**Question 6: 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.:**

RNID has no comments to make about the impact assessment, other than wishing to express our total opposition to any reduction in subtitling. In paragraph A5.7 there is a reference to "these arrangements should not disadvantage analogue-only sign language users, nor should they result in a significant reduction in the amount of subtitling." RNID believes it is vital that any changes in signing should not lead to any reductions at all in the amount of subtitling.

**Question 7: Do consultees consider that the proposed revisions to the Code are sufficiently clear?..:**

RNID considers the proposed revisions to the Code to be clear.

**Comments:**

RNID wishes to share with Ofcom and the public the findings from our research into the use of signed programmes by deaf people.

Our research can be accessed at:

<http://www.ictrnid.org.uk/docs/bsltv.pdf>