



## **National Association of Disabled Supporters**

*Informing, Uniting, Supporting*

### **7/ Do you agree that we should licence 'ADS-RSLs' once the ADS trial ends on 31 August 2006?**

NADS have been in discussions with the developers/operators of the new Wembley Stadium and we support their intention is to apply for an "ADS-RSLs Licence" in order to be able to supply event commentary to sensory impaired visitors on a secure frequency that is not open to interference from other sources.

NADS have pushed WNSL to provide sensory impaired visitors with an equalised event experience and our experience is that current systems suffer from interference from outside sources. Under the Disability Discrimination Act 1995, service providers are legally bound to provide all visitors with an equalised event experience and we believe that the proposed audio enhancement systems chosen will "provide a reasonable alternative method of making the service in question available to disabled persons" DDA 1995 21 (2). The DDA goes on to clarify that "regulations may prescribe...an auxiliary aide or service (which) would enable disabled persons to make use of a service" 21 (4)

We support WNSL's request to run a pilot scheme to trial the ADS-RSL licence in the Stadium from September 1<sup>st</sup> 2006.

### **8/ Do you agree with the technical characteristics of the licence? If not, what alternative proposals do you have in mind?**

We have no comment on the technical aspects of the system proposed for 60.75 to 62.75MHz but see my answer at Q13 below.

### **9/ Do you agree with our conclusions on the potential interference issues concerning shared programme-making use of the spectrum? If you disagree, please give reasons.**

Yes, for reasons stated in the consultation document 4.14

### **10/ Do the current arrangements ensure that programme-making use of the sub band at "known" events is adequately safeguarded?**

We have no comment on the technical aspects of the system proposed for 60.75 to 62.75MHz but see my answer at Q13 below.

### **11/ If circumstances permit, should 'ADS-RSLs' be available for longer than five days, and if so what is/are the appropriate licence duration(s)?**

We support WNSL's request for an annual licence.

### **12/ If circumstances permit, should the link between an "event" and an 'ADS-RSL' be removed to permit general "site" based licences?**

Yes, if a permanent site has an ongoing requirement for the service for events that would otherwise require licensing individually, and if the equipment is a permanently installed system that can be shown to be operating in a consistent manner for the duration of the licence. This would also ensure all events are treated equally regardless of the size or needs of the event owner.



**13/ Do you agree that the availability of 'ADS-RSL' licences should be extended to non broadcast frequency bands other than 60.75 to 62.75 MHz?**

As mentioned in Q7 above, NADS is aware of interference issues from existing licenses/systems. Anything that can reduce/eliminate the chances of interference would be welcomed.

**14/ Do you have any comments regarding costs and administration of 'ADS-RSLs'?**

The DDA does not allow providers to charge for the provision of reasonable adjustments and we welcome WNSL's intention to provide a free service for sensory impaired visitors in order to offer them an experience equal to that of visitors without sensory impairments.