

Title: Mrs

Forename: Eleanor

Surname: Ellison

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

Representing (self or organisations): Organisation

Organisation Name : RNIB

Question 1: Do you agree with the proposal to liberalise the restrictions on the issuing of S-RSLs in all areas where a new commercial service is advertised, or where a new commercial or community service is due to be, or has recently been, launched? If you do not agree with this proposal, please set out your preferred alternative explaining why you believe it would be a more appropriate option.:

Question 2: What is the most appropriate way for Ofcom to decide between competing short-term RSL applications for broadcasts to cover the same event in the same area at the same time?:

Question 3: Do you have any comments on other areas of S-RSL policy, as set out in the 'Notes for Applicants', that you would like to bring to our attention?:

Question 4: Do you agree with the proposal to allow commercial establishments to apply for L-RSL licences?:

Question 5: Do you agree with the proposal to offer L-RSLs for one-year as well as five-year period:

Question 6: Do you have any comments on other areas of L-RSL policy, as set out in the 'Notes for Applicants', that you would like to bring to our attention?:

Question 7: Do you agree that we should license 'ADS-RSLs' once the ADS trial ends on 31 August 2006?: Our organisation (RNIB) works very closely with leisure providers and the governing bodies of sport such as the FA, LTA, RFU and ECB to provide an audio description of sports events, i.e. cricket matches, football matches, rugby and tennis for blind and partially sighted people. We use voluntary commentators and there is no charge to the blind and partially sighted users for this service. We have done extensive work on developing this service, bringing games to blind people for the first time in 20 years for many older blind people.

We are currently using equipment that uses the frequency range 60.75 - 62.75 MHz and the licence exempt system of 863-865 MHz.

Both systems have their own advantages to bring sports events 'alive' for blind and partially sighted people. The current issue that is preventing sports clubs from using the more powerful RAD system is the need for a licence for each 'event' which for football and cricket clubs is up to two licences a week, making it very difficult in terms of expense and administration. We would like to see an annual affordable licence that takes into account the community use of this service; it is a totally free

service that the clubs are offering to their blind and partially sighted spectators. The Aural Aide system is portable and allows commentators to sit anywhere to transmit the commentary which is very useful where space is often limited in press boxes and broadcasting booths where they have to compete with professional broadcasters and journalists, the system also allows blind people to attend other grounds to hear the commentary as well as from their home base, again a license for this kind of use would make it very difficult for smaller clubs and associations to use. Our main concern at RNIB is, that this commentary that is provided is a vital factor in allowing blind people to attend and follow sports events and matches and the current licensing system does not help providers offer this essential service.

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

Question 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.:

Question 10: Do the current arrangements ensure that programme-making use of the sub-band at ":

Question 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)?: The current license system does not work well with sports clubs such as football cricket and rugby clubs who provide a match by match service often requiring two licences within a 7-day period. We would like to see an annual licence or longer for this kind of use where there is no commercial gain and where the use is restricted to disabled people, in this case blind and partially sighted people.

Question 12: If circumstances permit, should the link between an ":

Question 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?: Yes, in certain circumstances, an ADS-RSL licence should be available on the UHF spectrum that is currently available. This will allow a system to be used that is appropriate for use as part of DDA compliant service such as is being operated from sporting venues and facilities.

Question 14: Do you have any comments regarding the costs and administration of 'ADS-RSLs'?: The cost and administration of the ADS RSL's makes it prohibitive for smaller clubs and organisations to run a service for blind and partially sighted people at their premises for weekly games and events. The service that they operate for blind and partially sighted people is totally free, although the clubs do have to purchase the transmitting equipment, the additional licence charges can make the difference between clubs agreeing to provide the service or not, this is especially so with football and cricket clubs who do not have budgets for the service or the resources to administer the scheme.

Question 15: Do you foresee interest in accessing up to 8MHz of frequencies in the 55 to 68 MHz band that are presently almost unused, and if so for what types

of service and/or technology? Do you have any views on how Ofcom might release this spectrum to the market for use?:

Additional comments: My main comments are concerned with the unique use of the ADS. The service that we are developing and promoting with sports clubs and organisations has no commercial use and it is solely aimed at blind and partially sighted people who have no other means of accessing the service that allows them to enjoy a sports game or event. I feel that it is really important that we work with the leisure providers to help them provide this service and that OFCOM are seen to facilitate the extended use of the ADS licences for this purpose. Indeed the Disability Discrimination Act states that discrimination occurs when a disabled person receives a reduced standard of service as a result of their disability. According to the DDA, it is the duty of leisure providers (in this case, sports clubs and promoters) to provide a reasonable alternative method of making the service in question available to disabled persons? . In this case the reasonable alternative is a dedicated commentrayt that allows blind and partially sighted people to enjoy and follow a match, game or event. We feel that the licences should be issued free of charge or for a nominal rate and for a minimum period of one year for all sports clubs and events organisers when the usage is to describe events and activities to blind and partially sighted people.