

THE BBC RESPONSE TO THE DEPARTMENT FOR CULTURE, MEDIA AND SPORT CONSULTATION PAPER "REVIEW OF THE STATUTORY REQUIREMENTS FOR THE PROVISION OF SUBTITLING, SIGN LANGUAGE AND AUDIO DESCRIPTION SERVICES ON DIGITAL TELEVISION"

Introduction

The BBC is firmly committed to improving access to its services for people who are deaf or hard of hearing or who are blind or partially sighted. That pledge forms an important part of our annual *Statement of Promises*. We have therefore promised at least to meet the targets set by the Broadcasting Act 1996, the Broadcasting (Sign Language) Order 1997 and the Independent Television Commission, even though they do not apply to the BBC by law. Indeed, following the 1999 Licence Fee Review, the BBC willingly adopted much tougher targets for subtitling our digital channels than those required by the ITC.

The BBC's current targets are

- to increase the amount of subtitling on BBC 1 and BBC 2 from its present level of 67% to 80% by 2003-4;
- to work towards 100% subtitling of our digital channels by the tenth anniversary of their launch (the ITC target being 50%); and
- at least to meet the ITC's targets for signing and audio description.

Since April, we have been providing subtitles for 67% of BBC One and Two output (70% of BBC1, 63% of BBC2) against the ITC's target for 2000 of 60%. In most weeks, 100% of the BBC One and Two peak-time schedules is subtitled, the only exceptions being occasional classical music programmes (eg the Proms) and some sporting events.

From 1 November we shall also be increasing our current subtitling coverage to include all our children's programmes on Saturday and Sunday mornings.

We promote the availability of our subtitling and signing services on air and our next campaign will coincide with Deaf Awareness Week, beginning on 9 October.

Since 15 May we have also been offering over 8 hours of signed programmes per week, including a week-day interpreted news bulletin (a 15-minute signed news bulletin on BBC News 24 at 8.00am); a new signed sports programme, 'Sin Bin', interpreters on 'EastEnders Revealed', and signed documentaries like 'Back to the Floor', 'Blood on the Carpet' and 'Trouble at the Big Top'. BBC Choice will also show two hours of interpreted programmes each week, as will both BBC News24 and BBC Knowledge.

Since the launch of audio description on BBC channels on 15 May, we have on average audio-described around 2 hours of programming per week on BBC One, 3 hours on BBC Two, 1 hour on BBC Choice and 7 hours on BBC

Knowledge. These services are currently being broadcast to trial receivers, which are being distributed by ONdigital and the RNIB, in the absence of the prototypes of the modules that will eventually deliver audio description services.

We therefore welcome this opportunity to offer our views to the DCMS on this important subject.

Review of the statutory targets for DTT

Should the targets be changed or are they about right?

In the case of subtitling, the BBC already has separate and more demanding targets of its own.

Both signing and audio description services face considerable technical difficulties at the moment, since closed signing is simply not possible at present and the technology for delivering audio description remains experimental. In the case of signing and audio description targets there is a strong case for not obliging broadcasters to increase their current output until those technological difficulties have been resolved.

Broadcasters are already investing significant sums in audio description, although the very few receivers which are currently available are due to be replaced by a new prototype next year. The BBC is also committed to working closely with other broadcasters and receiver manufacturers to deliver an effective system of closed signing as soon as possible. While “closed” signing remains unavailable, however, significant increases in open signing risk complaints from those other viewers who find signing intrusive.

If the targets remain unchanged should there be a further review and when?

A further review of targets might be appropriate once the current technological difficulties affecting closed signing and audio description have been resolved and the services have become established.

What are the costs of delivering and receiving the services?

The BBC's total spend on subtitling services in 2000-2001 will be around £8 million, for signing £1 million, and for audio description £2 million.

The extra cost to viewers of receiving these services is nil in the case of subtitling and open signing. Audio description and closed signing receivers will be required in future, but their costs are as yet uncertain.

Would the quality of subtitling be affected if targets were increased?

The BBC makes every effort to ensure that the quality of its subtitles is as high as possible and we achieve accuracy levels of more than 98% on a huge range of live programmes. But subtitles for live programmes are always likely

to be more expensive and less perfect than subtitles for pre-recorded programmes, because of the lack of time available to produce them.

Rate of take up of digital services by people with sensory disabilities

We are not aware of any research into this area but our overall experience is that people with sensory disabilities are interested in similar programmes and services to the population as a whole.

Should there be different targets for different broadcasters perhaps based on audience share of channels? Should new channels be exempt from targets or have lower targets at first?

This is primarily an issue for the commercial broadcasters but the BBC has sympathy for the argument that the cost of these targets falls more heavily on channels with smaller revenues. We also support the approach that DTT targets are set by reference to the date of launch.

Should broadcasters who broadcast several channels be able to bundle their subtitling output between channels in order to meet an overall target?

These targets are a means to the end of giving a good overall service to people with sensory disabilities. The BBC therefore believes that, where channels are complementary, it is right to measure output across more than one channel, since this gives broadcasters the flexibility to target access services more in terms of likely demand from people with sensory disabilities than on the need to meet individual channel targets.

Which programmes or channels should be a priority for subtitling, signing and audio description?

The BBC believes that the viewing habits of people who are sight and hearing impaired are not significantly different from those of the general population. The BBC's priorities for subtitling are therefore to focus on peak-time, popular programmes and news and current affairs.

With audio description, our priorities are again for peak time programmes, with a particular emphasis on our popular drama, documentary, wildlife and comedy programmes. But these priorities will be reviewed as we learn more about the demands of those who use audio description, which is still very much at a trial stage in its development.

For signing, our priorities are also factual programmes, news, and documentaries.

How should equipment costs to the consumer best be met?

We expect equipment costs to the consumer to be modest and it is a key part of the BBC's R&D effort (in cooperation with other broadcasters, equipment manufacturers, and the key voluntary organisations) to minimise the costs of

consumer equipment. We do not believe that it is appropriate for broadcasters to meet the eventual costs of this equipment, however. For consumers on low incomes this should be a matter of social welfare policy.

If the targets are increased what will be the financial impact on broadcasters' programming?

The marginal cost of increasing targets will depend on the nature of the extra programmes being subtitled, signed or audio described. On a largely or wholly live channel subtitling costs may have a significant effect on programme budgets.

What are the opportunity costs to broadcasters in terms of alternative possible uses of spectrum in providing subtitling, signing and audio description services?

The opportunity costs of providing subtitling, signing and audio-description are difficult to quantify since it depends on what alternative uses for the spectrum broadcasters would have (eg further channels, greater interactivity etc) and on future developments in reducing the bit rate which these and other services require. Clearly, however, the bit rate used by subtitling is relatively modest compared to that required by each of the candidate methods of delivering closed signing, which will be comparatively bit rate intensive.

Should cable and satellite channels be required to provide these services? If so, should requirements apply to all cable and satellite services, or, for example, only to those with a large audience share or over a certain income threshold?

BBC channels broadcast in video on digital cable and satellite already offer subtitling and open signing.

Is there a need to train more subtitlers, signers and audio describers in the future; will technological developments help combat the skill shortage?

We believe that broadcasters will indeed need to continue to train more staff for all three services. The highest training demand will be for the stenographers who produce live subtitles and signers, but more people trained in subtitling and audio description more generally will also be needed. Technological developments will reduce the problems caused by skills shortage but will not eliminate that need.

An example of that technological innovation is the BBC's development of the Assisted Subtitling technique, which uses tools from speech recognition to assist in automating the production of subtitles on pre-recorded scripted programmes.

What will most encourage people with disabilities to take up digital services?

The BBC believes that the key to encouraging the take up of digital services is the availability of high quality digital channels and services (especially free to view services, since a large proportion of British consumers say they do not wish to switch to services which require subscription payments). We further believe that people with sensory disabilities are attracted to similar programmes and services to the average viewer.

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