

# **CHANNEL 4 RESPONSE TO DCMS CONSULTATION PAPER ON THE REVIEW OF THE STATUTORY REQUIREMENTS FOR THE PROVISION OF SUBTITLING, SIGN LANGUAGE AND AUDIO DESCRIPTION SERVICES ON DIGITAL TERRESTRIAL TELEVISION**

## **Introduction**

Channel 4 welcomes the opportunity to respond to this consultation paper which deals with issues of pressing concern to all digital terrestrial broadcasters.

Channel 4 is proud of its record in catering to the needs of people with disabilities, and in particular people who are deaf or hard of hearing. We have broadcast specialist programmes aimed at deaf viewers such as 'Sign On' and 'The Vibe'; have transmitted programmes in peak time about deaf people, notably last year's 'Deaf Century'; have portrayed deaf people within programmes in our main schedule; and earlier this year broke new ground with 'Freak Out', the factual entertainment disability series which included a deaf comedy strand. Next year sees both the start of a new series targeted at young people who are deaf or hard of hearing and a major season of programmes about blindness. Channel 4 also has a commitment to the training and integration of people with disabilities in the television industry, and has developed a database ([fourall.org](http://fourall.org)) to link programme makers with deaf and disabled talent.

Channel 4 has always seen it as part of our public service duty to be in the lead in subtitling our output. We currently subtitle 68% of our broadcast output and are well on course to meet the ITC's target of 80% subtitling by 2004. In addition, over 50% of our specialist film channel FilmFour is subtitled, even though the current requirement is for only ten per cent to be subtitled. In addition, Channel 4 provides live signing to accompany the broadcast of key national events, in particular the three main party leaders' speeches at their annual conferences and the Queen's Christmas Broadcast.

Channel 4 approaches this review confident in its record of catering to the needs of people with disabilities. However, the problems currently faced in providing signing and audio description services are not simply about the willingness of broadcasters to cater to the needs of the people who might use these services. There are real practical, technical and economic difficulties that need to be resolved before these services can be provided fully, and any consideration of altering these targets must start by recognising this.

Channel 4 also believes that the review needs to consider what is in the best interest of consumers as a whole. It should take into account:

- The fact that many millions of people benefit from subtitling, and that therefore it should be encouraged.
- The number of people who can potentially benefit from signing is estimated to be around 60,000.
- 'Open' signing, while of benefit to those few people who both understand it and receive DTT, may however be seen as a nuisance by the majority of DTT viewers.
- Legislation that limits the requirements to provide subtitling, signing and audio-description services to just one platform limits the consumer choices of viewers with sensory disabilities.

## **The Review of the Statutory Targets for DTT (paragraphs 7 –14)**

The technological and commercial difficulties currently facing the introduction of viable signing and audio description services are formidable.

The current work into a viable and acceptable form of signing being undertaken under the auspices of the Digital Network (TDN) of multiplex licensees has yet to identify the best possible technology. The anticipated technological solution that had been developed by the ITC turned out to be unacceptable to deaf users. Other technical solutions are now being worked on by a variety of broadcasters and manufacturers under the auspices of European community projects such as VISICAST and SAMBITS. These projects have the potential to deliver good bandwidth-efficient systems, but will not be ready for implementation until about 2002.

The compromise short-term position of introducing signing in the open in order to meet regulatory requirements has highlighted several difficulties. It has limited the choice of programmes that are being signed. In order to be fair both to viewers who want signing and those who do not, Channel 4 has decided only to sign programmes which are having a second showing (up until now, the 'Hollyoaks' omnibus and repeat screenings of 'Ally McBeal' and 'The Sopranos'). And viewers who do not want signing either have to put up with it, or switch back to analogue; hardly an encouragement to those who bought DTT because they saw it as a 'hi fi' medium. The ITC received 39 complaints about 'open signing' in two months, a number that might be expected to grow as more people acquire DTT.

Channel 4 strongly believes that the present target for signing should be frozen at its current levels until the technological problems have been overcome. Channel 4 does not advocate moving the end point target of five per cent by 2009 as we are hopeful that the present difficulties can be solved in time. But we do believe that the present impasse is best served by a more flexible approach that takes account of the real difficulties that are currently faced.

In particular, Channel 4 would be very reluctant to see the signing requirement increase to two per cent in November 2001 if no system of closed signing has been introduced by then. An increase in open signing will lead to more irritation and disruption for the great majority of viewers. It will also increase the potential 'legacy problem', of signing viewers getting used to a certain level of open signed programmes suddenly being deprived of them until they acquire the necessary technology to receive closed signing.

A suitable technology is being used for the transmission of audio description. However, there have been some problems with the manufacture and marketing of the receiving modules. Although TDN members have financed the development and production tooling of the module, there is as yet no production and distribution arrangement in place. What this difficulty highlights (and this could turn out to be as true for signing as it is for audio description) is that the problems are not purely technological; even when a technology has been developed, there needs to be a viable market to ensure that it can be utilised. Otherwise, one can be left in the somewhat farcical position of broadcasters fulfilling their obligations to transmit a service but no-one actually being in a position to receive it.

Channel 4 is hopeful that these current problems are in the process of being resolved, but believes that a cautiously optimistic approach is advisable, and that there should be no change to the targets for audio description as a result of this review.

We advocate a further review of the targets for signing and audio description in two years' time, by when the technological and marketing problems will be much clearer and hopefully much nearer resolution. There is nothing to stop broadcasters moving ahead of a review timescale if the problems are overcome sooner.

Channel 4 is well on course to achieve the ITC's analogue target of 80% of its programmes being subtitled by 2004. FilmFour has also already reached the ten year target. Channel 4 has no objection in principle to the targets for subtitling (whether analogue or digital) being raised, so long as sufficient lead time is given to allow for an orderly increase in the volume of subtitling. However, if the target was to rise much above 90%, this would create practical problems: there are logistical difficulties with subtitling certain live events, with ensuring that programmes that are delivered or edited very close to transmission can be subtitled in time, and with catering for last-minute programme changes. For these reasons, Channel 4 believes a subtitling target higher than 90% of its programmes would not be attainable.

The costs of providing services vary according to the nature and length of programmes. News and other live programmes are particularly expensive to subtitle, while a number of shorter programmes will cost rather more than one long one. As the proportion of programmes that are subtitled increases, so average costs will tend to go up as more live and difficult to subtitle programmes are included. It has been estimated that at present subtitling costs from about £500 per hour, while audio description costs in the order of £700 per hour and open signing costs over £800 per hour (both these last two figures include engineering costs; all figures exclude Channel 4's overhead costs). Channel 4 anticipates needing to spend about £5,00,000 pa on these services in order fully to meet the DTT targets.

### **Different targets for different broadcasters (paragraphs 17 – 18)**

Channel 4 is able to look at this from the perspectives of being both a mature broadcaster and the creator of new channels, having launched FilmFour two years ago and preparing now to launch the new E4 service. The present regime, whereby new channels have to increase their services over a period of time, seems a sensible one.

One important way in which current arrangements could be made more flexible, to the benefit of viewers and broadcasters alike, would be to change the requirement for weekly quotas. At present broadcasters have to meet the quota for each service each week. This reduces flexibility and can tend to make somewhat rigid the choice of which programmes are selected for subtitling, signing and audio description. This can be a particular problem with a schedule like Channel 4's, which often changes at short notice, has many short-run and one-off programmes, has all its programmes made by outside companies, and often has delivery dates close to transmission to ensure topicality. (In comparison an all-film channel like FilmFour has a schedule that is decided many weeks in advance and rarely changes). We would recommend allowing broadcasters to meet the quotas over a longer period of, say, three months in order to provide the flexibility to plan service provision more appropriately.

Channel 4 believes it is the role of broadcasters, not government, to decide which programmes to provide subtitling, signing and audio description for, and therefore does not believe there ought to be any central prioritising. Broadcasters try and make intelligent choices about which types of programmes would benefit most from different services, ensuring that all tastes and communities are catered for.

### **Costs** (paragraphs 19-20)

Channel 4 is working with the ITC and other broadcasters to develop signing and audio description services, and representatives of those who would use these services have been consulted as part of this process. One reason why the introduction of closed signing has been held up is because of objections to the proposed technology from representatives of the deaf community. The prototype Audio Description modules are being trialled with the help of the RNIB.

Channel 4 is obviously keen that users should have receiving equipment, so that they can actually make use of the services we are providing. But we believe that broadcasters' responsibility is to provide the television services, not pay for or subsidise receiving equipment.

Once signing and audio description are properly available, an in-depth research project should be conducted into the take-up of these services before the current obligations on broadcasters are expanded further. Otherwise broadcasters could find themselves spending considerable sums providing services which are being used by relatively few people, resources which could be devoted to providing other such services or to making programmes.

### **Cable and satellite** (paragraphs 21-22)

The present targets for subtitling, signing and audio description apply only to DTT broadcasters. This imposes costs on channels broadcasting on DTT that do not apply to broadcasters who are only on other platforms. More importantly, it imposes restrictions on the consumer choices of deaf and hard of hearing and blind and partially sighted viewers: they are forced to choose DTT rather than cable or satellite because it is the only platform that guarantees the services they require.

And if the government intends to use access to digital cable and digital satellite as well as DTT to meet the digital switchover requirement, it would disenfranchise those visually and hearing impaired viewers who are only able to receive either cable or satellite.

For these reasons Channel 4 believes the targets which apply to DTT services should be extended to all cable and satellite services.

### **Shortage of skilled staff** (paragraph 23)

There are limited numbers of people engaged in this work, and as the levels of subtitling, signing and audio description increase, so will demand for their services. Technologies are being developed, particularly in the field of voice recognition, which may allow both subtitling and signing to be done electronically in the future. But considerable development work still needs to be carried out on these services, not least to gauge their acceptability to the deaf and hard of hearing.

### **Conclusion**

Channel 4 is committed to providing high quality services to help people who have sensory disabilities. But the practical problems that have been encountered in getting closed signing and audio description services up and running mean that a cautious approach should be taken when reviewing the current targets.