

DEAF BROADCASTING COUNCIL

RESPONSE TO THE REVIEW OF THE STATUTORY REQUIREMENTS FOR THE PROVISION OF SUBTITLING, SIGN LANGUAGE AND AUDIO DESCRIPTION SERVICES ON DIGITAL TERRESTRIAL TELEVISION

Overview

DBC would not accept any reduction in the current standard or level of service, be it in terms of quantity or quality, a comment which is made on the basis of the ongoing feedback we receive from deaf (including culturally deaf), deafened and hard of hearing people (subsequently referred to as “deaf people”). We regard access to broadcasting, video and audio visual communications as a basic human right to enable us to play a full part in society.

We also consider there is a need for much more emphasis on regular consultation with consumer groups to ensure that projected and existing services meet the needs of viewers.

Response to clauses in the Consultation Paper

10. We understand the concerns that provision of sign language access is costly, however, this matter was first raised at the Deaf Broadcasting Council AGM in 1993. We therefore consider there has been sufficient time in which to develop cost effective systems, technology is changing so quickly and it is disappointing that it does not seem to be much further forward in provision and reception of closed signing than we were in 1993.
11. DBC would not accept any lowering of the target for provision of sign language access. It is important to make it clear that between 50,000 and 70,000 people have sign as their preferred language. Those people do not find it easy to receive information through subtitling, sign language is the ideal medium of conveying messages to this large group of people. It is worth adding that, brilliant as subtitling is, it is a “flat” means of conveying information compared with skilled sign language interpretation or presentation.
13. Should the targets be changed – see above

Should there be a further review – when some of the existing problems with transmission and equipment have been resolved

What are the costs of delivering and receiving the services? We cannot comment on the cost of delivery, but sign language must be received without additional cost to the viewer.

Would the quality of subtitling be affected if targets were increased? There can be no justification for even considering such a thing. Feedback indicates that quality of service is of equal importance to quantity and that quantity is of little use without quality. Broadcasters will be aware that DBC receives a constant stream of feedback on **quality** aspects, we would expect subtitling companies to explore ways of using speech recognition and any other developments to assist them. Hearing people would not be expected to accept lower quality of sound because broadcasting is expanding. For deaf people the subtitling replaces the sound, therefore the same criteria must apply – **no** reduction in quality.

14. We do not have any detailed information on take-up of digital services but are aware that a number of people have subscribed. Where potential demand is concerned, deaf people are no different from any other sector of the general population and we would expect them to take up digital services in due course.

The Government should be aware that one reason for slow take-up of digital services is that many perceive the current “free to air” services as sufficient for their needs. Others are unhappy with the quality and variety of programmes available on the free to air services and might subscribe to digital channels if they were assured there is more choice, better quality, and **access** for them. Current low levels of access to digital programmes is no inducement for a deaf person to even consider subscribing and information in the media has not helped to clarify the position.

Overall, however, there is a lack of clear information on the options, it is a confusing scenario for everyone.

15. Where cable is concerned, the position for deaf people is chaos. Nobody is able to tell us clearly whether or not subtitling can be received even in areas which are connected to cable. Cable companies themselves are difficult to contact, currently they have not provided points of contact for consumer groups such as our own and this is a totally unsatisfactory situation.

The position with satellite services is similar to cable, however, there is a need for legislation to apply to both in order to provide consumers with a better service and liaison than is currently available. [It can take six months for a deaf person to resolve a problem with satellite companies].

For analogue, we would expect increasing output to be simulcast with 100% of output subtitled, at the latest, by 2008.

18. Different targets for different broadcasters. From experience, we can state with confidence that there is always someone who wants access.

New channels – see 17. With the aim of being co-operative, we suggest that all these issues are addressed by detailed consultation with consumer groups on a case by case basis and that this requirement is spelt out in legislation.

Bundling to achieve an overall target - DBC is strongly opposed to aggregating targets across channels. An example is BBC where historically we received a lot of complaints about the fact that output was higher on BBC1 which meant that a number of programmes people wanted to see on BBC2 were not subtitled.

19. Which programmes or channels should be priority for:

Subtitling – we regard this question as being superfluous. Technology is sufficiently advanced for us to have a date when we can expect 100% access. It should be borne in mind that subtitling is not only used by deaf people, it is used by people in noisy surroundings, when the sound quality is poor and by people who want to improve their reading skills. All in all it is a valuable educational tool which also provides access for people who cannot hear the sound. It is time all parties recognised this fact.

Signing – service providers should hold ongoing consultations with consumer organisation(s) representing sign language users to resolve this question.

20. How should equipment costs to the consumer best be met – the answer is simple – by inclusive design as promulgated by the DTI and, most importantly, interoperability. Interoperability is of great importance to us because, whilst welcoming the fact that one VCR manufacturer has made products which can record subtitles, subtitles recorded on those machines cannot be viewed on other manufacturers’ VCRs even if they can display subtitles. If the necessary technology to enable sensory and/or physically disabled people is incorporated as *standard* there is no extra cost for anyone. We all pay the same. However, there may be some disabilities which require enhanced equipment and these should be dealt with specifically. In general, however, if the necessary chips are incorporated in the end product as standard, we would never have had the problems experienced by deaf people in obtaining video recorders which could record subtitles.

Whilst addressing equipment, many deaf people have built up collections of VHS subtitled videos. How will they be able to access them when analogue services are switched off and suitable equipment no longer available?

Financial impact on broadcasters' programming if the targets are increased – if the cost of subtitling is *included in the programme budget*, proportionately the cost is lower than looking at providing subtitling for X% of output. It is essential that subtitling – and signing if it is to be used – is seen by broadcasters as integral to the programme.

22. Should cable and satellite channels be required to provide subtitling and signing – most definitely **yes**.

And it should apply to all services. All service providers should recognise that deaf people are consumers. Provision of access generates goodwill and is evidence that the service provider recognises the importance of this sector of the market.

23. Shortage of skilled personnel

DBC has previously written to DCMS on this matter we are concerned the matter has not already been addressed. It is obvious that expansion in broadcasting would necessitate an increasing number of skilled personnel and we hope it will now be followed up as a matter of urgency.

Whilst technology has the potential to help combat the skills shortage, it **cannot** replace human input. This particularly applies to sign language and we stress the importance of maintaining ongoing consultations with representatives of consumer organisations for sign language users.

24. As already stated, there is a need for clear, concise information to be conveyed to all sectors of the population.
25. The Deaf Broadcasting Council is well known in the deaf community as an organisation which directly represents consumers and makes every effort to consult and meet them. Our contact details which include email, fax and website, are well publicised and utilised. We are therefore confident that this response reflects the views and needs of most deaf, deafened and hard of hearing people.

NB We have not commented on audio description because it is outside the DBC's remit.

Ruth Myers
Secretary
13 September, 2000