

RESPONSE FROM HEARING CONCERN

on

THE DCMS CONSULTATION PAPER

Review of the Statutory Requirements for the Provision of Subtitling, Sign Language, and Audio Description Services on Digital Terrestrial Services.

Hearing Concern represents the hard of hearing, and has some 7000 members and associate members. Consultation has taken place by personal contact through Hearing Concern's Broadcasting Committee, letters from members, and the results of questionnaires.

The hard of hearing should have access to digital television on the same level as the normal hearing. For this to be achieved the provision of subtitles is very important. It is the hard of hearing audio, and as such should be given similar status to the audio channel.

With this background we make the following comments.

- * We assume that simulcast services will remain at the levels set for the analogue service.
- * The targets set for new services, subtitling 50% by the tenth anniversary of the start of the digital terrestrial television programme service is far too low. Assuming a new service, we would suggest a minimum of 10% of subtitled programmes by the first anniversary, with an increase of a further 10% by each anniversary. If targets are increased, we believe that the financial effect on broadcasters' programming will be negligible!
- * Cable and satellite channels should be required to meet the same targets as the mainstream broadcasters. All should be controlled by the same mandate.
- * The quality of subtitling must remain at least to the standard set for the analogue service. Subtitles should be provided to an agreed standard of presentation and technical quality.
- * Subtitle figures should apply to each channel. There should be no aggregation or averaging, because one programme provider provides several channels.
- * Priority programmes for subtitling might be news, current affairs, lifestyle/consumer, afternoon game shows, chat shows and sport.
- * Equipment costs to the consumer should not discriminate against those with sensory impairments. All receiving equipment should incorporate the circuitry

necessary for the delivery of subtitles to a prescribed standard. Recording mediums capable of recording subtitles as well as audio/video should be readily available at no extra cost. This would spread any additional costs for subtitle reception over all consumers.

From our information we believe that there is little take up of digital services in the free to air channels. There is little inducement to change from analogue to digital. One important barrier is that they are not really free; either needing the purchase of a set top box or a payable subscription for a commercial programme package. Another is the poor reliability of subtitles provided through the digital domain. A third is the reluctance to throw away the remaining life span of good analogue sets.

It may be necessary to give some inducement, such as free set top boxes, to increase the take up of the digital services.

We have made no comment on audio description and sign language, as we consider these to be outside the remit of Hearing Concern.

Bert Neale.
Chairman, Hearing Concern, Broadcasting Committee
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