

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

**Response by the  
Royal National Institute for the Blind**

## **1. Introduction**

1.1 The Royal National Institute for the Blind (RNIB) is the largest organisation representing the interests of the 1.7 million visually impaired people in the UK. RNIB challenges all barriers in the path of blind and partially sighted people and works to ensure their access to services and information on an equitable basis.

1.2 RNIB recognises the importance of television in visually impaired people's lives. RNIB's Needs Survey showed that 94% of visually impaired people watch television on a regular basis.\* Television is often an essential lifeline for elderly people and those on low income. 90% of visually impaired people are over the age of 60, and many are less mobile than older people generally. They are highly dependent on the broadcast media for information, entertainment, education, and often for "company". RNIB campaigned vigorously for audio description targets in the 1996 Broadcasting Act.

1.3 RNIB has worked with the broadcasting and telecommunications industries on a number of initiatives, and campaigns on a range of access issues. Digital television will provide many opportunities for a wider range of services for everyone. However, many of the features that digital television offers are not accessible to visually impaired people, making benefiting from the full range of services difficult, if not impossible.

1.4 RNIB is pleased to see the Government's recognition of the importance of access to television services for visually impaired people and welcomes the opportunity to respond to this consultation paper.

## **2. Review of the Statutory Targets for DTT**

2.1 RNIB has already expressed its frustration and concern to the DCMS and the ITC at the delay in introducing a fully accessible audio description service. Whilst recognising that digital terrestrial service providers have been broadcasting some described programming since the deferred deadline of May only a few, specially selected, visually impaired people are currently able to receive it via a second set-top box arrangement set up by The Digital Network. Although development of the module that will carry the audio description has been re-scheduled production is not expected until Spring 2001. However, this is not the long-term solution - that is the incorporation of a second sound channel into all digital television receivers.

2.2 RNIB campaigned for the targets in the 1996 Broadcasting Act but was very disappointed at the low level set for audio description. (It is worth noting that until the last committee stage reading of the Bill this target stood at 50%.)

2.3 RNIB feels that even though a widely accessible service has not yet started the audio description targets must be reviewed. By the time the Government finalises this current review in November the service will be one year late. By the time a service starts in 2001 it will be eighteen months late. This is unacceptable, particularly as both sub-titling and signing services are available. The Government and the broadcasting industry have known since the middle of 1996 that an audio description service will have to be provided but have not taken sufficient steps to ensure that a service can be delivered.

2.4 RNIB believes that the overall target for audio description must be higher. 10% of a provider's output is insufficient, particularly for a broadcaster on air for 24 hours per day, 7 days per week (only 16.8 hours per week would be described). In order to achieve a service that will really make a difference to visually impaired viewers, and encourage their take-up of digital terrestrial television, the ten year target must be at least 50% of output (with the intervening years' targets increased accordingly).

2.5 At the beginning of this year RNIB conducted research into the potential purchase of the audio description module. The results showed a potential market of 55,000 for the first three years of availability.

(Of the sample, 151 participants, 58% were very/interested in accessing audio described programmes, with 21% fairly interested. A total of 49% were interested in acquiring digital terrestrial television and audio description. The 55,000 figure was calculated using an extrapolation comparing the estimated UK household take-up of digital terrestrial television with households of visually impaired people.)

### **3. Other Issues Relating to the Provision**

#### **3.1 Sections 15-18**

3.1.1 RNIB recognises that certain programmes do not need audio description but it is difficult to make sweeping exemptions. For example a documentary programme consisting solely of interviews probably would not need description (provided that all contributors were properly identified verbally). However, it would not be possible to exclude all documentaries as a category as many do require description.

3.1.2 RNIB recognises also that the output of channels varies considerably and that, to benefit visually impaired viewers, some channels need more described output than others.

3.1.3 RNIB would welcome a debate about a more equitable provision of described programming. For example, if a company provides a channel where very little (if any) programming would benefit from audio description, and provides other channels that would benefit from greater provision, its total requirement could be spread over all its channels. Another way would be to consider the overall output of a multiplex provider. However, any changes to the existing structure cannot be made without adequate consultation, and each situation would need to be assessed in its own right. RNIB does

not feel it is appropriate to try to link targets to audience share.

3.1.4 At this stage RNIB feels that it would not be appropriate to allow new channels to be exempt or have lower targets. It is important that all channels understand and address the needs of their audiences, which should be taken into account in any planning and budgeting.

3.1.5 There are certain categories of programming that benefit most from audio description but, as mentioned above, it is dangerous to make sweeping assumptions.

## **3.2 Sections 19-20**

3.2.1 Broadcasting and telecommunications developments are converging to provide a new kind of communications infrastructure - one where service provision and reception, particularly via a set-top box, are inextricably linked. For visually impaired people it is essential that the difficulties of interacting with these new developments are recognised by the Government and the industry. RNIB recognises that The Digital Network is funding the development work on the audio description module. However, it is not acceptable for the broadcasting industry and the Government to leave the production and distribution of the module (or any future receiver) to market forces, or even worse to the voluntary sector, to resolve.

3.2.2 RNIB was very disappointed when it became clear that audio description was not going to be available via the early generations of ONdigital set-top boxes. If this capability had been in place the current problems surrounding development and production of a module would not have occurred. However, RNIB has worked with TDN members to try to find an acceptable solution and is currently liaising on the "interim test service". Although RNIB is, of course, willing to do what it can to progress audio description it feels that by becoming responsible for solving the production and distribution mechanism it is undertaking a role that should not be expected of a charity.

3.2.3 The reliance on a separate module does, of course, create other problems:

- the cost of the module to users. Visually impaired people will have to pay more than digital terrestrial viewers to receive accessible programmes. Hopefully this will be a reasonably short-term measure (until future inclusive equipment is available) but it will be a factor in discouraging the take up of digital terrestrial services (particularly if the targets remain at their current low level).
- the complexity of setting up an ONdigital set-top box and the installation of the module. Sighted people are expected to install their ONdigital box themselves by reading written instructions - both on paper and on screen. Access to the latter is particularly important if there are installation problems. In addition to these issues there is the problem of installing the module into the Common Interface slot. It is essential, therefore, that the Government and the broadcasting industry recognises that visually impaired people need a qualified installer - potentially yet another cost that the sighted subscriber does not have to bear. For this reason RNIB has been trying to set up a distribution deal with **boxclever**, ideally ensuring that the visually impaired person does not have to incur this installation cost.

3.2.4 Now that a limited audio description service has started the broadcasters have a greater awareness of the cost of providing the service. This cost can be built into future programme budgets. All providers must ensure that their services are accessible to all users, particularly important in the developing digital environment where people are paying increasing amounts for television services.

### **3.3 Sections 21-22**

3.3.1 RNIB fully supports the provision of audio description by cable and satellite channels. By excluding these channels visually impaired people are denied the full choice available to sighted viewers when making decisions on the range of services that is the greatest interest to them.

3.3.2 Audio description should be provided for any channel that broadcasts programmes that would benefit from it. Viewers interested in "minority" channels should not be excluded from the equality of access the audio description provides.

### **3.4 Sections 23-24**

3.4.1 There will be a need to train more describers. Two describer organisations are currently setting up accredited training programmes (the Audio Description Association, in conjunction with the National Open College and RNIB; Vocaleyes with the Central School of Music and Drama and RNIB). In addition the companies providing television description services provide in-house training. All description providers should work together to ensure cost effective training is developed and that acceptable standards of training and description are met. All training must involve input from RNIB and/or visually impaired advisors.

3.4.2 Effective training of describers and management of describer services should ensure that the quality of the description is not affected. However, regular monitoring of description by providers, regulators and visually impaired advisors should be built into the operation.

3.4.3 Visually impaired people will be encouraged to take up digital services if -

- audio description is provided, at acceptable levels, on all digital platforms
- universal provision is available, offering choice of service provider, including interactive services
- digital equipment (including electronic programme guides and interactive controls) is accessible+
- at home technical support is available (i.e. not being expected to correct any problems via a call-centre operator and reading on-screen menus)
- information about the full range of services is available in a

range of formats

- additional costs do not have to be incurred (i.e. not having to pay more than a sighted viewer)
- the overall cost of equipment and services is at an acceptable level (9 out of 10 older visually impaired people are living on an income of less than half the national average \*\*).

+ It is absolutely essential that the Government address the overall access needs of visually impaired people in any debate about digital television. The provision of audio description is essential but its benefits could be obscured by the overall inaccessibility of the equipment. The navigation of digital services is dependent on an electronic programme guide/on-screen menu and a remote control or keyboard interface - inaccessible to visually impaired people. Changes to existing services/channels and the availability of new services are notified by software downloads and on-screen information and are consequently inaccessible. In order to meet the needs of visually impaired people and its own universal access to information requirements the Government must ensure that the communications industry is providing accessible services and equipment.

#### **4. Conclusion**

4.1 Visually impaired people expect to be part of the social and cultural life of the UK. Television plays an integral part in all our lives. To ensure visually impaired people are not excluded from all the benefits that digital television brings their access needs must be addressed by the Government and the broadcasting industry.

4.2 As detailed in this paper there are many issues confronting visually impaired people in the digital age. An increase in the targets for programmes with audio description and inclusion of all digital platforms will be a step in the right direction.

4.3 RNIB would welcome the opportunity to discuss these issues further with the DCMS to ensure that the Government fully addresses the needs of visually impaired

people.

\* Bruce I, McKennel A and Walker E (1991): Blind and Partially Sighted Adults in Britain: The RNIB Needs Survey Volume 1, London, HMSO

\*\* Baker and Winyard (1998): Lost Vision: older visually impaired people in the UK. RNIB

Denise Evans  
RNIB

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