

Consumer Expert Group response to the interim report on Digital Britain (11 March 2009)

The consumer expert group on digital switchover welcomes the opportunity to comment on the Digital Britain interim report.

1. Comment on ACTION 7 "We will consider at what point and at what cost the standard offer provided by the Digital Television Switchover Help Scheme could have a return path capability, and we will ensure that such capability is available as an option. "

The CEG supports the idea of a return path, as it could give people an additional means to access information and services such as the ability to book their GP appointments or use TV voting systems. However, the CEG advises that the inclusion of a return path should not complicate the help scheme offer, and different CEG members have different views on whether a return path should be optional or not. Using return path services will never become the preferred way of accessing information and services for some help scheme recipients, either because the interface is inaccessible to people with specific disabilities (such as sight loss), or because they are more comfortable using traditional face-to-face and telephone services.

The CEG recommends therefore that the services a return path could deliver should be seen as an addition to existing services, not as a substitute. In addition, adding a return path to the help scheme equipment options should not take priority over the outstanding issue of making the equipment interface fully accessible to blind and partially sighted people through talking menus.

2. Comment on ACTION 8 "We will examine how the marketing and communications activity around Digital Switchover could be enhanced to use the region-by-region programme of publicly funded information and advice on one form of digital transition to provide impartial information on wider opportunities of digital beyond digital broadcast television."

It is generally recognized that digital switchover communications have to get complicated multiple messages across, for example, about the help scheme, about landlords, about the different digital TV options, retuning, switchover dates etc. .

The CEG would therefore strongly recommend that the marketing and communications activity around Digital TV Switchover are not complicated further by adding in additional messages until the switchover in any given region is successfully completed.

In addition, the impact of additional messaging on digital outreach and the voluntary sector have to be considered, both the impact on their current

effectiveness and the resources they would require to deal with the additional queries and requests for assistance about additional digital opportunities beyond digital television.

3. Comment on ACTION 9 "We will take action to support DAB digital radio in seven areas " etc..

The Consumer Expert Group welcomes the inclusion of Digital Radio in the interim report of Digital Britain and the recognition that more work is needed as outlined at action point 9.

We also welcome the reference to consumer representation.

However we consider that the interim report fails to recognise a set of important consumer issues, and urge the government to reconsider the following issues in its final Digital Britain report:

3.1. that the level of consumer representation in the process would need to be of the same size and importance as the consumer representation that is currently taking place in the switch to digital television through the CEG.

3.2. the importance of content: We welcome the commitment to explore how the BBC could extend DAB coverage to replicate at least current FM analogue coverage. However we are concerned that there is no commitment to ensure that all listeners will still be able to receive the current range of stations should switch over take place. It is not acceptable for the switch to reduce the radio offering currently available across the UK.

A major driver in the take up of digital television has been the vast increase in the number of channels both on subscription and free to view services. Radio has not yet made available a similar increase in unique digital output. While Rajar figures indicate a continuing increase in digital listening via all digital platforms during 2008, in the last quarter there was no increase on the previous quarter.

3.3. the recommendations of the consumer impact group of the DRWG into the switch to digital radio (November 2008)¹. In particular, we want to re-iterate the following recommendations:

3.3.1. A compelling argument as to why digital migration is desirable for consumers and what its benefits would be for consumers still needs to be made.

3.3.2. The proposed migration criteria of 50% of all listening through digitally enabled devices is too low, and disproportionately affects disadvantaged groups who are less likely to be represented in the first 50% to take up digital radio. We would therefore like to see the 50% figure analysed in more detail and a stronger case made for it.

¹ http://www.culture.gov.uk/reference_library/publications/5731.aspx

3.3.3. A help scheme will be essential to assist those where the cost of migration is significantly greater than the benefit (this includes financial costs as well as other costs such as having to learn to use a new interface).

3.3.4. The current consumer uses and preferences in radio receivers are not fully understood, particularly those of the most vulnerable groups who are also those most dependant on Radio. Before a switch to digital can begin research should be undertaken to examine the extent of ownership and usage of analogue and digital radio particularly amongst disabled people, older people, people whose first language is not English and consumers from low income households.

3.3.5. . We note that part of the role of the delivery group will be to increase the attractiveness, availability and affordability of *DAB*. This misses the concerns of expert consumer organisations such as RNIB who commissioned independent academic research into the design of sets. (Freeman, J., Lessiter, J. and Ferrari, E. (2009) Are you really listening? The equipment need sof blind and partially sighted consumers for accessible and usable digital radio - available on <http://www.goldsmiths.ac.uk/i2/publications.php>) While the research highlights the needs of blind and partially sighted people such as access to voice output and good colour contrast on the interface, there is also evidence that easy to use functionality is often the key issue in the purchase and use of DAB equipment by all consumers.

3.3.6. We are concerned that consumers should have clear and impartial information on all equipment and a kite mark scheme should be provided. This principal has wide application across all aspects of meeting consumer needs in the drive to a digital Britain.

3.3.7. The environmental impact of a switch to digital is a concern of many consumers. While the power consumption of digital devices is falling there needs to be a mechanism in place to ensure that most new equipment is as, or more, energy efficient than existing equivalent analogue sets. A major difference between television and radio switch over is the need to throw away equipment. It is estimated that over 100 million radios will be thrown away and the impact on the environment needs to be assessed.

3.3.8. Loss of quality because of DAB transmission and standards
Those listeners who are hard of hearing found that those stations which broadcast on lower bit-rates more difficult to hear. The group would like to see research commissioned to establish how the level of bit-rates affected listening by the hard of hearing and the research findings should be taken into account into any migration plan. This is a particular issue for those in the 65+ and 75+ age groups, suffering from age-related hearing loss.

3.3.9. The role of specialist voluntary sector organizations

Government needs to recognise and include in any help scheme activity those charities that already work within this area, for example, The British Wireless for the Blind Fund and W4B – The TV and Radio Charity - the two leading providers of charitable support with in the UK - so they are not adversely

affected in the short or long term. Both charities have much experience helping vulnerable people access radio and television more easily. They both expect a considerable upturn in the number of people requesting assistance not only with the provision of a set, but also with the additional training that will be required to enable them to use it. They also expect a substantial upturn in the number of people who can afford to buy equipment but who would request assistance in the choice of equipment. Neither organisation is currently in a position to deal with an increased demand on their services of the magnitude that is expected to be generated by switchover.

For further information, please contact:

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