

Consultation response form

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| Question 1: Do you agree with our assessment of the key issues involved to inform regulations in this area? | Yes. We are pleased to note that programmes should be “presented in, or translated into, sign language”. |
| Question 2: Are there other ‘access services’ which you believe should be specified in any regulations? | No comment |
| Question 3: Do you have views on the relative importance of sign-presented programming and sign-interpreted programming? | <p>Yes. We believe that sign-presented programming is vital, as the growth in the usage and appreciation of BSLBT’s programming over the last 10 years testifies. We would happily provide more data to Ofcom on request, but for now would refer to Ofcom’s <i>2010 Review of Signing Arrangements for low-audience channels</i> when the overwhelming majority of responses to a questionnaire sent to more than 150 organisations and clubs for deaf people indicated a preference for sign-presented over sign-interpreted programming.</p> <p>The audience for sign-presented programmes is the Deaf community whose first and preferred language is British Sign Language. English is at best a second language, and indeed written and spoken language is not part of Deaf people's natural experience or culture.</p> <p>This means that subtitling on television is often a challenge - and real access to, and understanding of, many programmes may be limited.</p> <p>It is our view that, in the absence of sign-presented programmes, sign-interpreted programming is of value to Deaf people on news and current affairs programming, but not on drama, comedy, entertainment or children’s programming where a single interpreter superimposed on a programme must seek to convey what many different people are saying.</p> |

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| | <p>We would also add that BSLBT aims to address the social exclusion of Deaf people. It is the sole provider of television programmes made specifically for the Sign Language community. As well as providing vital information in their native language, here Deaf people can also see themselves and their lives reflected, and their experiences and culture shared and acknowledged through their preferred language. Deaf children and young deaf people at last have role models to identify with, while a geographically fragmented deaf population is brought together and validated as a community. In addition, the programmes provide visibility of the Deaf community to the mainstream world.</p> |
| <p>Question 4: To what extent can or should regulations require usability features including (but not necessarily limited to): provision of information; accessible catalogues; and best practice relating to the creation, selection, scheduling and presentation of accessible programming? If you do not believe that these features should be required by the regulations, should the regulations require Ofcom's resulting code to give guidance on these issues?</p> | <p>No comment</p> |
| <p>Question 5: Do you agree that audience benefit, cost, and practicability are appropriate grounds for differentiating services/content for the purposes of regulations? Are there other grounds on which you believe ODPS programmes/services should be differentiated (prioritised, excluded, or subject to different requirements)?</p> | <p>Yes</p> |
| <p>Question 6: Should the regulations impose more stringent requirements on public services broadcasters' ODPS than on ODPS provided by others?</p> | <p>No comment</p> |
| <p>Question 7: Should the regulations limit accessibility requirements to programmes/services which have previously been broadcast with access services, or impose more stringent requirements on these programmes/services?</p> | <p>No comment</p> |
| <p>Question 8: Do you consider that ODPS programmes/services should be excluded from the full requirements on the grounds of audience size? If so, should there be</p> | <p>No</p> |

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| different requirements for excluded programmes/services? | |
| Question 9: Should the regulations impose different accessibility requirements on ODPS made available via certain platforms, and if so which? | No comment |
| Question 10: Do you have any views or information on appropriate and available means of measuring the audience impact of ODPS? | We would happily share with Ofcom our views and data on the impact of the BSL Zone online. |
| Question 11: Are there particular types/genres of programming which should be excluded from requirements, or subject to reduced requirements, on the grounds of limited audience benefit? | No comment |
| Question 12: Do you consider that ODPS programmes/services should be excluded from the full requirements on the grounds of affordability? If so, should there be different requirements for excluded programmes/services? | No comment |
| Question 13: Do you have any views or information on appropriate and available means of quantifying: ODPS-specific revenue; and costs associated with ODPS access services? | No comment |
| Question 14: If you are an ODPS provider, do you have information on the likely costs involved in providing access services on your ODPS? | Yes, we have data on providing sign-presented content, in-vision interpretation and subtitling which we would share with Ofcom. |
| Question 15: Do you consider that ODPS programmes/services should be excluded from the full requirements on the grounds of technical difficulty? If so, should there be different requirements for excluded programmes/services? | No comment. |
| Question 16: Should regulations include quotas on percentages of programming available with access services? If so, what should the quotas be? If not, what other methods do you consider appropriate for the purpose of setting access service requirements for ODPS? | No comment |
| Question 17: Do you think that there should be a phased introduction of requirements? If so, please give details. | No comment |

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| Question 18: Do you think that the introduction of requirements should prioritise particular types of ODPS programmes or services? | No comment |
| Question 19: Should ODPS providers be able to propose alternative arrangements, and if so what type of arrangements? | Yes, a good example is BSLBT for the provision of sign-presented programming. |
| Question 20: Do you have any other comments or information you wish to share in relation to the drafting of regulations on ODPS accessibility? | |