

## **RNIB response to Ofcom's consultation on changes to the digital television and digital radio technical codes**

### **About us**

RNIB is the largest organisation of blind and partially sighted people in the UK and welcomes this opportunity to respond to the consultation.

With blind and partially sighted people at the heart of everything we do, our community of over 33,000 people brings together anyone affected by sight loss. More than three quarters of our Board of Trustees are blind or partially sighted. We support, empower and involve thousands of people affected by sight loss to improve lives and challenge inequalities. We engage with a wide range of politicians, organisations and professionals to achieve full inclusion through improvements to services, incomes, rights and opportunities.

We campaign for the rights of blind and partially sighted people in each of the UK's countries. Our priorities are to:

1. Be there for people losing their sight.
2. Support independent living for blind and partially sighted people.
3. Create a society that is inclusive of blind and partially sighted people's interests and needs.
4. Stop people losing their sight unnecessarily.

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### **Consultation Response**

**Consultation question 1: Do you agree with our proposals for adding requirements to the Television Technical Code and Digital Radio Technical Code relating to resilience of broadcast networks and access services?**

RNIB agree that the resilience of access services is as important as the resilience of the broadcast network that carries them. The needs of access service users must be considered as important as the needs of

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other viewers and a failure of access services can make content completely unusable.

**Consultation question 5: Do you have any comments on the EMF, HbbTV, or document format modifications proposed in this section?**

RNIB notes that section 7.6 of the consultation document is considering recommending HbbTV alongside MHEG-5. We are not aware of a single MHEG-5 app that has been accessible through voice but Digital UK have demonstrated that an HbbTV app can be accessible through voice with the Freeview Accessible TV Guide. We understand there are also attempts to better integrate the HbbTV APIs with TV accessibility features which may mean that in future HbbTV apps can make use of screen readers built into Smart TVs.

The consultation document states that the relevant DTT Reference Parameters are non-binding. With this in mind RNIB suggest they should encourage qualifying services to consider accessibility when building data services and favour technical standards that have the highest potential of future accessibility.

Accessibility of data services should include where practical:

- A high contrast colour scheme by default or as an option,
- Magnification or text enlargement,
- Spoken navigation to enable users with sight loss to find content,
- Spoken content to enable users with sight loss to use the service,

If it is not deemed possible to add speech to the data service in its current form then services should be designed with future screenreader integration in mind by:

- Sending written information as text rather than images,
- Including provision for images to have alt text or a textual equivalent,
- Considering any metadata that may be required for speech-based navigation in menu design

John Paton  
Media, Culture and Immersive Technologies Manager  
RNIB  
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