

Consultation response form

<p>Question 1(a): Do you agree that EPG providers should use reasonable endeavours to secure so far as practicable that their EPGs include options for users to use all or as many as possible of the following accessibility features: (a) ‘text-to-speech’, (b) ‘filtering or highlighting’, (c) ‘magnification’ and (d) ‘high contrast’ displays (i.e. with a contrast ratio of no less than 7:1)? If not, please explain why you do not agree giving reasons.</p>	<p>This is simple modern technology. It should not say ‘reasonable endeavours’ – it should be compulsory!</p>
<p>Question 1(b): Do you agree with the changes to the EPG Code that we propose to make to implement these proposals? If not, please explain why you do not agree giving reasons.</p>	<p>No – ‘reasonable endeavours’ for a simple technological upgrade is not enough. Under UNCRPD and the Sustainable Development Goals, as well as the Equalities Act, this must be made compulsory so that blind people can access the world of TV and radio.</p>
<p>Question 2: Do you agree that the proposed features should be rolled out on all new models of TV receivers commencing development from when the changes to the EPG Code that we are proposing enter into force, and any subsequent models (using reasonable endeavours, so far as practicable)? If not, please explain why you do not agree giving reasons.</p>	<p>Yes, but ‘reasonable endeavours, so far as practical’ is the world’s biggest loophole. Large corporations can afford to do this.</p>
<p>Question 3: Do you agree with our revised proposal to retain and amend paragraph 10 of the current EPG Code, which requires EPG licensees to produce an annual statement regarding accessibility? If not, please explain why you do not agree giving reasons.</p>	<p>Yes</p>
<p>Question 4: Do you agree that with the changes that we propose to make to paragraphs 7, 11 and 13 of the current EPG Code to simplify the Code? If not, please explain why you do not agree giving reasons.</p>	<p>Yes</p>
<p>Question 5: Do you agree with our assessment of the impact of our proposals, in terms of the benefits and costs associated with these proposals for consumers, EPG providers, and set top box manufacturers? Please explain the reason for your answer, providing supporting evidence on costs and/or benefits where available.</p>	<p>I do not know the specifics of this issue, but I know the technology is easy. My iPhone and all other modern mobile phones have voiceover and Siri (or equivalents). Microsoft has accessibility options. With the advances in artificial intelligence this is not rocket science and the needs of blind people can easily be accommodated in this modern era.</p>

Question 6: Do you agree with our assessment of the impact of our proposals on the relevant equality groups? If not, please explain why you do not agree.	Don't know, but if it's optional – it's not effective.
Question 7: Do you have any other comments on our analysis or proposals?	If this is not implemented quickly, I'm sure it is only a matter of time before somebody takes legal action to ensure that providers make reasonable adjustments under the Equalities Act so that blind people can access this information. Ofcom should be taking a strong lead before this becomes necessary.