

Organisation (if applicable):

European Union of the Deaf (EUD)

Question 1: Do consultees agree with the proposed approach to setting audience share thresholds for other EU Member States? If not, do they have practicable alternatives that they would like to propose, which would be comparable with the approach taken to domestic channels:

Yes, EUD agrees.

Question 2: Do consultees have any comments on whether the approach taken to assessing the costs faced by domestic licensees is also appropriate to non-domestic licensees? If so, what alternatives would they propose, and why:

Yes, EUD agrees.

Question 3: Do consultees have any comments on how it is proposed to assess the cost of providing access services, including the provisional assessment of costs:

For the European internal and non-domestic market it would be useful to make the assessment of costs public information to ensure UK positive examples can be used by others.

Question 4: Do consultees agree that non-domestic channels required to provide access services with effect from January 2014 should be permitted to commence provision in accordance with the targets corresponding to the first anniversary of the notice date:

Yes, EUD agrees.

Question 5: Do consultees agree that Ofcom should count language subtitling towards access service targets for subtitling:

No EUD does not agree. The issue with language subtitling is that it does not provide full and equal access to deaf and hard of hearing people. A programme might then only be partially subtitled or not adequately subscribing additional auditory information (such as noises, doors closing etc).

Question 6: Do consultees agree that, for a transitional period of two years from 1 January 2013, broadcasters should be allowed the alternative of providing additional subtitling in place of signing, in order that they can have the opportunity to devise alternative arrangements that may be more beneficial to sign language users:

In principle EUD supports this idea but strongly recommends public and transparent consultation with the relevant Deaf organisations (British Deaf Association, European Union of the Deaf) and renowned Deaf experts (nominated by Deaf Associations) to ensure that subtitling will not remain the only form of access and that adequate sign language access can be provided after this transitional period.

Question 7: Do consultees have any comments on the proposed changes to the Code on Television Access Services, as set out in Annex 3:

No comment. We do not have the resources to analyse these figures in depth.

Question 8: Do consultees have any comments on the impact assessment (Annex 2)?:

No comments.