

Organisation (if applicable):

The Swedish Disability Federation

Additional comments:

Swedish Disability NGO have made written statements on access service when there were consultations related to the implementation of the Audiovisual Media Service Directive in Sweden,. Many organisations have stated that they find it hard to answer the OfCom consultation because it is in another language and legal system. If OfCom is interested in the end user perspective we recommend the answers (in Swedish) to the national consultation <http://www.radioochtv.se/Templates/Pages/NormalPage.aspx?id=338&epslanguage=sv>

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:

The rules should be easy to understand and cover as many broadcasters as possible to actually contribute to implementation of the AVMS, and not so complicated that they will open for different interpretations. They must not be below national requirements in the country of the audience. In fact, as the UK has been leading the development of accessibility services in Europe they should be used to raise the level.

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:

The rules are different in the respective countries, thus having an effect on costs. At the moment it seems as OfCom have more knowledge of the market than national agencies. It is important to comply with the overall aim of the AVMS e.g. to increase accessibility. There is one service that is not covered in the UK. That is audio or spoken subtitles, that could even be good for the domestic UK audience to deliver translation in minority languages and Welsh. Audio subtitles is considered the least expensive access service and should be covered.

National requirements in Sweden, see link to document in English

<http://www.radioochtv.se/Tillstand-och-registrering/TV/Nya-krav-pa-tillganglighet-i-tv-pa-svenska/>

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:

The cost for producing access services varies a lot depending on distribution. It could be that assessments of costs relating to a special way of distributing access service will result in services that cannot be received by end users. It would be necessary to somehow secure the quality of the service from the end user perspective. See also position from the European

Disability Federation on indicators to check and assess tv accessibility <http://www.edf-feph.org/Page.asp?docid=29753&langue=EN>

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:

There is no need to postpone the date. The requirements should be effected earlier.

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

Subtitling from a foreign language to the national language of the intended audience should not be counted, it is already in place. To comply with the AVMS directive and increase the accessibility the targets should cover subtitling of the national language and quality aspects such as colour coding reflecting who is speaking and sounds.

There is an urgent need for audio or spoken subtitles used to translate speech in a foreign language for people with vision impairments and dyslexia. The requirement for spoken subtitles has been an important issue for decades in Sweden where the majority of the content in commercial channels is usually in English. Spoken och Audio subtitles is also described in Making TV accessible from the International Telecom Union Focus Group on Audiovisual Media Accessibilitiy. <http://www.itu.int/en/ITU-T/focusgroups/ava/Pages/default.aspx> According to Digital Europe the DVB standard has been updated concerning spoken subtitles, with reference to EN 300 468 and supplementary information for audio streams codecs usage TS 101 154.

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:

OfCom should be well aware that people with hearing impairments and deaf people require complimentary services from domestic services. Of course people need national sign language as well as quality subtitles. Cost effective solutions for distribution of national sign language interpretation via Internet has been tried out and tested in Sweden, it is also a solution that works remotely, so that the interpreters could be in Sweden even if the broadcaster is in another country. So there is no need to postpone requirements if they could be distributed via web and on demand.

The Hbb standard already has solutions for several of these accessibility features, for more information contact the ITU Focus Group mentioned earlier.

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

The system seems very complicated. We repeat that the purpose is to increase accessibility. The risk for high costs for small broadcasters is avoided through other parts of the code.

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

Promotion of awareness (paragraph 32) is important, and a European standard seems to be needed to make sure that the audience is aware of any service provided. A common standard would probably make it easier to monitor and review access services.

Equal Opportunities Act (paragraph 35) important to seek advice from people with disabilities, but in order to avoid discussion on which legislation is valid in the case of non-domestic channels, it might be good to refer to relevant articles (in particular 4.3, 9, 21 and 30) in the Convention on the Rights of People with Disabilities, CRPD, as the convention is also valid on a European Level.

Periodic Review (paragraph 37) as the technical development is fast it is important to review the code frequently.