

RNIB Response to the Content Management on the HD Freeview platform Consultation

25 March 2010

1. Introduction

As the largest organisation of blind and partially sighted people in the UK, RNIB is pleased to have the opportunity to respond to this Ofcom Consultation.

We are a membership organisation with over 10,000 members who are blind, partially sighted or the friends and family of people with sight loss. 80 per cent of our Trustees and Assembly Members are blind or partially sighted. We encourage members to be involved in our work and regularly consult with them on policy and their ideas for change.

We also provide expert knowledge to business and the public sector through consultancy on improving the accessibility of the built environment, technology, products and services.

2. The Importance of Television to Blind and Partially Sighted People

Since our Needs Survey in 1991 showed that a large majority of blind and partially sighted people watch television¹, RNIB has taken an active role in highlighting TV access issues. It has worked to try to ensure access to programmes, services and equipment, both by direct work with broadcasters and manufacturers and by influencing legislation.

In this digital age, being able to watch TV remains important to blind and partially sighted people. In 2006 Research by the University of Birmingham² found that around 87 per cent of blind and partially sighted people regularly watch TV and videos or DVDs. The broadcast media plays an important role in the lives of

¹ RNIB Needs Survey (1991) Blind and partially sighted adults in Britain: the RNIB Survey Volume 1, by Ian Bruce, Aubrey McKennell and Errol Walker

² Douglas, G., Corcoran, C., Pavey, S. (August 2006) Network 1000: Opinions and circumstances of visually impaired people in Britain: report based on over 1000 interviews.

blind and partially sighted people by providing access to news, information and entertainment.

3. RNIB Response to Content Management on the HD Freeview platform

RNIB feels that the individual consultation questions are targeted at specialities of HD content management that are very specific. However there are overarching issues that should be considered in this consultation. Therefore RNIB will provide a short response to the consultation in order to convey our concerns on how introducing DRM to HD Freeview content would impact on blind and partially sighted audiences.

RNIB has a history of commissioning and co-operating with manufacturers on projects to improve access to consumer electronic equipment for blind and partially sighted people. An example of this is the development of a talking Set Top Box. The introduction of DRM to Freeview HD content would restrict RNIB's scope for commissioning further innovative equipment targeted at the blind and partially sighted audience, because of the increased licensing costs this would introduce.

RNIB is a strong advocate for Audio Description (AD) and it's imperative that AD remains a prominent access service across all digital television platforms. Introducing DRM to Freeview HD broadcasts would place a licensing requirement that would need to be satisfied for a user to be able to access the AD content. This extra requirement would potentially restrict the production of digital TV receiving equipment solely to those manufacturers who can afford to absorb the additional licensing costs required for DRM handling. Small niche manufacturers may not be able to absorb the additional costs involved. That would subsequently limit the amount of digital TV equipment available on the market, causing the amount of AD-supported equipment to decline.

Open source development is a rich breeding ground for powerful products designed specifically for the disabled user. DRM would restrict the innovation in this area, leading to fewer specialist products being available.

RNIB does not support the introduction of DRM to Freeview HD content as it would make the market less likely to support the needs of blind and partially sighted people, by offering higher priced, less accessible alternative Freeview HD receiving equipment compared to that which is available in a non-DRM environment.

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