

Response from Royal National Institute of Blind People (RNIB) to Ofcom Consultation:

London 2012 Olympic Games and Paralympic Games Draft Spectrum

The Royal National Institute of Blind People (RNIB) welcomes the Ofcom London 2012 Olympic Games and Paralympic Games: Draft Spectrum consultation and we welcome the opportunity to submit comments to this consultation.

1. About us

As the largest organisation of blind and partially sighted people in the UK, RNIB is pleased to have the opportunity to respond to this 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 government policy and their ideas for change.

As a campaigning organisation of blind and partially sighted people, we fight for the rights of people with sight loss of all ages in each of the UK's countries. We work to:

- improve access to treatment for sight threatening conditions and raise awareness of eye health
- improve provision within health and social care services
- increase the amount and range of accessible information
- promote equal access to learning throughout the lifecourse
- tackle discrimination in employment and get more blind and partially sighted people into work
- ensure a secure income for blind and partially sighted people unable to work or who have retired.

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.

As the leading charity for sight loss in the UK, RNIB has widespread expertise in community development, business development, leisure, volunteering, training and accessibility. As such RNIB has a huge role to play in ensuring that blind and partially sighted visitors and athletes attending the world's largest sporting and cultural event from the UK and abroad during the London 2012 Olympic and Paralympic Games are able to access all elements of the Olympiad experience. In addition, that blind and partially sighted radio and television viewers in this country receive accessible broadcast options, accessible interactive platforms and services.

RNIB will also promote inclusion and access for blind and partially sighted people wanting to engage in the first ever Cultural Olympiad across the UK. RNIB also seeks to influence the delivery of the London 2012 Olympic and Paralympic Games and we will work with a wide range of partners to create the best legacy possible for blind and partially sighted people.

2. About Audio Description at Sporting Events

Live Audio Description

Audio description is provided at many live sporting events (including those held at Wembley Stadium, Lords Cricket Ground, Hampden Park and a wide range of football and cricket grounds in the UK) to provide live commentary on the sporting action for blind and partially sighted people within the stadium. It is delivered via a radio transmission to spectators throughout the stadium.

Audio description enables them to follow everything that is happening on the pitch. This includes the sporting action taking place for example at a football match the game itself as well as things happening visually in the crowd and off the ball incidents that the crowd may be reacting to and setting the context to these reactions.

Broadcast Audio Description

Audio description is also provided by broadcasters in the UK for 10% of television programmes on the main TV channels. RNIB plans to work with the BBC to ensure that live audio description of the major events,

sporting and cultural, at the London 2012 Olympic and Paralympic Games is available on the BBC programmes and content.

3. Ofcom Draft Spectrum

We do not have responses to the specific questions posed by the consultation. However, we have substantive issues that need addressing in this consultation regarding audio description and the requirements in relation to the draft spectrum.

a) Planning

The planning approach suggested within the consultation document is based on previous large scale events where audio description was not provided for blind and partially sighted people. Therefore the baseline taken to commence planning is not representative of what London 2012 Olympic and Paralympic Games needs to provide in terms of spectrum for audio description.

b) Spectrum for Audio Description for Live Sport

The proposal does not recognise in any satisfactory way the issue of providing spectrum to meet the audio description needs of blind and partially sighted spectators at any of the London 2012 Olympic and Paralympic Games venues and events. RNIB have already had initial discussions with the Olympic Delivery Authority (ODA) about the provision of audio description for the London 2012 Olympic and Paralympic Games and we would welcome discussions between all parties to ensure spectrum is made available for this purpose.

RNIB would also welcome discussions amongst all parties to ensure that the necessary radio spectrum is available for the provision of audio description at all Olympic and Paralympic Games venues that are not London centric and not just the main Olympic Park venues. There are non London centric venues, such as Eton Dorney and Weymouth, where spectrum space would also be required for live audio description at the venues.

c) Spectrum for Live Audio Description for the Cultural Olympiad

Providing spectrum for audio description for the Cultural Olympiad is not referred to in the proposal. RNIB requests that blind and partially sighted people should have equal access to these major events, such as the Opening and Closing Ceremonies for the London 2012 Olympic and Paralympic Games, Torch relays and medal ceremonies, as their sighted counterparts. It is also crucial that blind and partially sighted paralympian athletes attending the opening and closing ceremonies are able to access the live audio description commentary of the ceremonies.

As an important precedent, the Beijing to London handover ceremony that took place in London in 2008 was audio described to those attending who required this service; spectrum would therefore need to be provided for audio description at these live cultural events.

RNIB consider this to be a major gap within the current proposed spectrum proposal and we would welcome focused discussions on this element of the spectrum proposals.

d) Broadcast Audio Description

RNIB will be requesting that the BBC ensure that live broadcasts of major events from the Olympics and Paralympics will be audio described on television broadcasts. This will enable blind and partially sighted viewers to experience the events in their own homes. RNIB would therefore ask Ofcom to explore that spectrum space for this additional audio stream is made available.

RNIB would also welcome discussions amongst all parties to ensure that spectrum is available for the provision of television audio description.

e) Spectrum Test Events

Test events for London 2012 Olympic and Paralympic Games are referred to in brief terms within the consultation document. RNIB would request that audio description services, both live and broadcast, and the use of the spectrum for the provision of these services are tested at these events.

e) Commonwealth Games in 2014

The consultation refers to the Commonwealth Games spectrum for 2014 and RNIB hopes that Ofcom will take into account RNIB's request for audio description to be included in the spectrum requirements for this event and for future large sporting events in the UK, including the 2013 Rugby League World Cup and the 2015 Rugby Union World Cup.

4. Future Discussions

RNIB would welcome further discussions with Ofcom, ODA and LOCOG about the technical solutions and specifications required to meet the needs of blind and partially sighted people that we raised in section 3 of our response. This will then ensure that audio description is made available so blind and partially sighted people can access events at the London 2012 Olympic and Paralympic Games, 2012 Commonwealth Games and well as future major sporting events hosted within the UK.

5. Further Information

For more information contact Alison Talbot, email: Alison.talbot@rnib.org.uk , telephone 0121 665 4233 or Anna Jones, email: anna.jones@rnib.org.uk ,telephone: 020 7391 2150.