

## **Comments:**

Dear Marco Marini

re: response to the Ofcom Draft Annual Plan 09/10

### 1. heading "promotion access and inclusion"

1.1. . RNIB welcomes the review of the Television Access Services Code outlined the Draft Annual Plan 09/10.

RNIB is actively campaigning with broadcasters and MP's to increase Audio Description to 20% in 2009.

We encourage Ofcom to include the 20% Audio Description target in the new Television Access Services Code.

We believe that much has changed since 2006, when the 10% targets were originally set. Now is the right time to increase the audio description targets for the following reasons:

- Awareness of AD has dramatically increased
- Freeview equipment that receives audio description is now much more widely available
- All customers of Sky and Virgin Media receive AD automatically
- Digital switchover has now begun. The switchover help scheme will make equipment that can receive audio description available to everyone over the age of 75 or registered as blind or partially sighted.
- Ofcom (the media regulator) has a duty to promote media literacy which they define as being able to understand communications (ie TV). We believe blind and partially sighted people need more audio description in order to be fully media literate.

We recognise the impact of this target within the Public Service Broadcast debate and the current economic climate. For many blind and partially sighted people television is a source of information and a link to the outside world - most blind and partially sighted people are over the age of 65, and 48% of over 65's consider television to be their main source of company . 94 per cent of blind and partially sighted people watch TV on a regular basis.

Should you require any assistance reviewing the Television Access Services Code this year, please do not hesitate to contact us.

1.2. RNIB welcomes the intention to work on key services that enable disabled users to participate in the economy and society

It is important that this workstream includes areas where there is insufficient access and inclusion for blind and partially sighted people. This workstream should be used to force real progress in the areas of equipment accessibility for blind and partially sighted people as well as in the areas of internet use by blind and partially sighted people.

RNIB is concerned that this workstream should cover the usability/accessibility of digital radio equipment. We will soon be publishing research in this area that we would want Ofcom to consider as part of this workstream.

2. heading "supporting the evolution of radio".

We want to draw Ofcom's attention to the recently published report of the consumer impact subgroup to the Digital Radio Working Group on digital radio . RNIB contributed to this report and supports all its findings, and Ofcom should take them into account in this workstream.

3. heading "promotion media literacy"

This is a very important workstream, and media literacy of disabled people should be high on the priority list. We welcomed the Review of Ofcom's Media Literacy Programme 2004-08, and urge Ofcom to put in place priorities to ensure that the ability of disabled people to access content and services is given priority (as per Ofcom's own definition this means the ability to use, navigate and manage equipment, content and services rather than to the availability of services.)

Yours sincerely

Leen Petre  
Principal Manager, Media and Culture  
RNIB

references

Help the Aged [www.saddestnumber.org.uk](http://www.saddestnumber.org.uk)

Freeman, J. et.al. Are you really listening? The equipment needs of blind and partially sighted consumers for accessible and usable digital radio.

November 2008:

[http://www.culture.gov.uk/images/publications/Consumer\\_Impact\\_Group\\_Report\\_to\\_DRWG.pdf](http://www.culture.gov.uk/images/publications/Consumer_Impact_Group_Report_to_DRWG.pdf)

**Question 1: What are your views on the continued relevance of Ofcom's three-year strategic framework for the proposed work programme in 2009/10?:**

**Question 2: What are your views on Ofcom's proposed policy work programme and top priority areas for 2009/10?:**

**Question 3: What are your views on the elements which should be contained within Ofcom's new strategic framework?:**