

**Advisory Committee for Older and Disabled People (ACOD) response to
the Draft Annual Ofcom plan 2008/9**

The process leading up to this present document started, for ACOD, at our July 07 meeting. We had a strategic planning session, which enabled us to consider, not only those issues on the Ofcom agenda, but also those which committee members felt were important and maybe not being considered.

Further opportunities at the Ofcom Strategy day in October 07, as well as discussions with the Chairs of the Nations and Regions Advisory committees, ensured that we could make further input.

The resulting document, therefore, has within it the majority of areas of concern to ACOD and our constituencies. It is probably fair to state that our priorities do not totally match those in the plan, but they do enable us to engage with the issues that are a real concern to us.

The Committee was particularly pleased to see that the five areas covered in the strategic framework included:-

- Ensuring delivery of public interest objectives
- Improving empowerment, protection and enforcement for citizens and consumers
- Considering the legal and economic framework for communications regulation, *especially where it engages with the EU.*

Indeed the work programmes for each of the five strategic areas include ACOD concerns, especially those identified as being Ofcom's top priorities on page 7.

Therefore in answer to the consultation questions, we respond as follows.

1. We agree that the three year framework is highly relevant to our constituencies.

2. We would agree that the high priorities do enable us to contribute fully to Ofcom's work

3. We have always felt that care needs to be taken when considering reducing the regulatory burden, as we are often advising Ofcom on behalf of minority groups of people. When one leaves matters to the market and competition, these groups often 'miss out'. A good example currently is the difficulty Visually Impaired people are having in understanding and securing Audio Description and for Hearing Impaired people, specialised text services such as Captel, where in both cases numbers of beneficiaries are relatively small.

4. On the International front, we believe that real efforts need to be made in Europe to broaden the USO Directive. This is particularly important for Older and Disabled people.

Finally, although broadly happy with the work plan, we were disappointed that the annual plan gave little or no specific mention to Ofcom's own Disability Equality duties and perhaps there could have been more explicit mention of 'Access and Usability' and Portrayal and Employment. We of course are thinking of Older and Disabled people in this context. The challenge with portrayal and employment matters is to ensure that because they are long term issue that they are not forgotten. It is important to continually remind people that everyone of us working for Ofcom has a responsibility to continually work to improve these areas.

Thank you for the opportunity to respond to the consultation.

Mike Whitlam CBE

Chair ACOD