Question 1: What are your views on Ofcom?s proposed three-year strategic policy framework?:

Question 2: What are your views on Ofcom?s proposed priorities for 2007/8? In particular::

Question 2a: What are your views on the work which Ofcom should do in 2007/8 to drive a market-based approach to spectrum?:

Question 2b: What are your views on the work which Ofcom should do in 2007/8 to develop new ways to deliver public outcomes as platforms and services converge? :

Question 2c: What are your views on the work which Ofcom should do in 2007/8 to improve business compliance and empower consumers? :

Learning Difficulties Media?s response to Ofcom?s
Draft Annual Plan 2007/8

Learning Difficulties Media helps people with learning disabilities get more from the media as consumers, contributors, creators and ?content?. Our work has mainly concentrated on people?s experiences as TV viewers. At present, it is unfortunately very common for people to be plonked in front of a TV set which they perhaps can?t see or hear properly, may not physically be able to move away from and which is showing a programme which they haven?t chosen to watch and can?t understand. Among other resources, we have created a 3DTV guide, introducing a new concept of highly participative, multi-sensory television.

We have almost finalised a media literacy course for people with learning disabilities, converting complex media concepts into accessible information with enjoyable, practical exercises.

Ofcom?s draft annual plan

Predictably, then, we particularly welcome Ofcom?s commitment to ?empowering consumers? and the ?new priority in 2007/8 ?. to place a much greater emphasis on facilitating improved communications capability, particularly among vulnerable groups?. As illustrated above, people with learning disabilities face formidable challenges in being able to access (and in some cases avoid) the broadcast media. The paradox is that this is a disproportionately important source of information, learning and enjoyment for a group who are not print literate.

There are two areas where Ofcom can further empower people with learning disabilities as media consumers, both through Ofcom?s own work and through funding and supporting the work of specialist organisations. The two areas are media

literacy and accessible technology.

Media literacy skills

Precisely because people with learning disabilities have a heavy reliance on the broadcast media, especially television, this is an area of relative expertise for them. Recent BBC research has shown that not only do this group watch more television than other people, but that many have considerable knowledge, especially of the soaps. This is therefore a strong base on which to develop those skills.

There are specific issues for people with learning disabilities in relation to the main aspects of media literacy:

1. Access
Being able to successfully access the media requires people with learning disabilities to be able to:
a. Know what is available, including which programmes are on and when
b. Physically manage media ?equipment?, eg remote controls
c. Understand broadcast output ? i.e. what?s happening in programmes

2. Analyse and evaluate
This is impossible without first being able effectively to access the desired media, both physically and cognitively. It then requires additional intellectual and educational skills, and confidence, to deconstruct messages and to form their own opinions.

3. Create
Poverty of intellectual, practical and aspirational resources makes the creation of media out of the reach of most people with learning disabilities at present. A few ground-breaking media, including Internet, projects have demonstrated that with the right support, people can make their own media. One example is the Oska Bright film festival of shorts made by people with learning disabilities.

Accessible equipment

Convergence offers exciting possibilities of:
? Computer technology being used in conjunction with or adapted for use with other broadcast media
? The mode ?advanced? expectations of access with computers influencing what becomes possible with other broadcast media

For example, there are several types of computer adaptations which are greatly valued by people with learning disabilities, and those who support them, and which would transform people?s ability to access television if these could be incorporated in, or at least influence, TV technology. They are:

Speech operated controls (or ?voice recognition? software and hardware)
http://www.abilitynet.org.uk/content/factsheets/pdfs/Voice%20Recognition%20Softw
are%20-%20An%20Introduction.pdf

Keyboard and mouse alternatives
http://www.abilitynet.org.uk/content/factsheets/pdfs/Keyboard%20and%20Mouse%2
0Alternatives.pdf

?Big switch? technology
http://www.abilitynet.org.uk/content/factsheets/doc/Learning%20Difficulties%20and
%20Computing.doc

Adapted consoles for computer games eg Logic 3 Arcade Stick:
http://www.gameseek.co.uk/pd/Multivcuwkf72s1900xx/

And finally touch screens are now well-established ?mainstream? hardware but
remain invaluable for people without print literacy skills and/or with mobility or
dexterity problems.

**Question 2d: What are your views on the work which Ofcom should do
in 2007/8 to promote competition and innovation in converging
markets?:**

**Question 3: Are there additional areas where Ofcom should reduce
regulation and minimise administrative burdens? Please provide
specific examples.:**

Comments: