

Communications Consumer Panel and ACOD response to Ofcom's call for inputs on speaking TV programme guides

Introduction

The Communications Consumer Panel and ACOD welcome this initiative and the opportunity to comment on Ofcom's call for inputs on speaking TV programme guides. We welcome the input provided to date by the Royal National Institute of Blind People (RNIB).

The Panel works to protect and promote people's interests in the communications sector. We are an independent body, established by the Communications Act 2003. The Panel carries out research, provides advice and encourages Ofcom, Government, the EU, industry and others to look at issues through the eyes of consumers, citizens and micro businesses. The Panel pays particular attention to the needs of older people and people with disabilities, the needs of people in rural areas and people on low incomes, and the needs of micro businesses, which face many of the same problems as individual consumers. There are four members of the Panel who represent the interests of consumers in England, Northern Ireland, Scotland and Wales respectively.

Following the alignment of the Advisory Committee for Older and Disabled People with the Panel, the Panel is more alert than ever to the interests of older and disabled consumers and citizens.

Response

TV and EPG usage

As the Call for Inputs notes, research undertaken by Access Economics estimated that 1.8 million people had partial sight or blindness in 2008, of whom about 218,000 people were estimated to have no sight. The research found that there were people of all ages with visual impairments, but that the group was skewed heavily towards older people. The research also estimated the total of those with partial sight and blindness in the UK was projected to grow to over 2.2 million by 2020, and to over 4 million by 2050.

We note that a survey commissioned by Ofcom in 2006 found that blind and visually-impaired people watched more television than those without sight impairments¹.

Ofcom's 2013 research into Disabled consumers' ownership of communications services² found that, by comparison with the UK population as a whole, people with a visual impairment were slightly more likely to have access to Freeview/Freesat (62% vs 53%) and slightly less likely to have access to pay TV (44% vs 55%).

Figure 1.55 Household device/service ownership overview: visual impairment

	Non-disabled	All disabled	Visual impairment
Fixed Line	74%	79%	72%
Any mobile	87%	81%	80%
Smartphone	48%	27%	33%
PC	79%	59%	65%
Internet access*	83%	55%	62%
Tablet	17%	10%	11%
Pay TV	55%	46%	44%
Freeview/Sat	53%	64%	62%
DAB	26%	21%	20%

Source: British Population Survey, 2012: July – September 2012

Base: non-disabled: 17,412, all disabled: 4,095, visual impairment: 367

*Internet access is based on personal access anywhere – other services and devices are based on presence in home rather than individual ownership.

Yet, for the reasons outlined in the call for input, and as demonstrated at the Ofcom roundtable with visually-impaired people in April 2014, many people who are blind or visually-impaired are likely to find using a conventional EPG difficult or impossible and the difficulties encountered by some people with partial sight are enough to discourage some from attempting to use conventional EPGs.

Implications

While a study in 2002 on how blind and partially-sighted viewers used EPGs found that most participants relied on family or friends to tell them what was on TV, or on their memory of when certain programmes (e.g. soaps) were on TV, the former option is not easily available to everyone and we note that research suggests that there are some

¹ At a time when, on average, UK residents were watching around 3.46 hours a day, those with visual impairments were watching 3.8 hours of television a day. *Provision of access services: research study conducted for Ofcom*, Ofcom, March 2006

² <http://stakeholders.ofcom.gov.uk/market-data-research/other/telecoms-research/tce-disabled-13/>

123,000 households in the UK including people with severe, mild or moderate sight loss that do not include a sighted adult.

As we understand it, as a result of people encountering difficulties using traditional EPGs, many viewers with visual impairments face a restricted choice of viewing. The Call for Inputs quotes a 2008 survey which found that people with visual impairments who could not see the EPG tended to watch a more limited repertoire of channels than others. They relied heavily on memorising channel numbers, and had to relearn them when channels were re-ordered³.

Alternatives

We appreciate that secondary devices and apps can provide accessibility for some people - smartphones and tablets are increasingly popular, particularly if dexterity is not an issue. However these are not a solution for everyone, for a variety of reasons including affordability and as they are often accessed through a separate user interface which can present an additional challenge. While some people can find other ways of substituting for conventional EPGs, older viewers are likely to face additional barriers to coping with sight loss. We note that at Ofcom's roundtable, a blind person demonstrated that while a smartphone app could be used to find out information about TV programmes, it could also prove to be complex and a non-intuitive process. We understand that touchscreens can also present difficulties for older users.

In relation to the use of relevant apps on smartphones or tablets, we note that older people are much less likely to own a smartphone - a recent survey found that only 11% of those aged 65-74 and 2% of those aged 75+ owned smartphones, compared to over three-quarters of 16-24 year olds.

The 2014 Communications Market Report noted that ownership of tablets is lower among over-55s than other age groups, although growth in take-up has risen from 4% of over-55s in 2012 to 28% in 2014.

In terms of internet access per se, Ofcom's 2013 research Disabled consumers' ownership of communications services found that for older (65+) less affluent disabled people, internet access levels are at their lowest (23%) which is significantly lower than among non-disabled people of the same age and socio-economic group (37%)⁴.

We also have concerns related to the compatibility of apps with different devices and the challenge of re-pairing devices if they lose connection over wifi.

³ *People with visual impairments and communications services*, July 2008, Ofcom (<http://stakeholders.ofcom.org.uk/market-data-research/other/tv-research/visual/>)

⁴ <http://stakeholders.ofcom.org.uk/market-data-research/other/telecoms-research/tce-disabled-13/>

As the Call for Inputs notes, secondary devices often have more limited functionality than conventional EPGs, and do not provide access to all the information that would be provided in an EPG and may require the use of an additional interface.

We would be interested to understand more about the potential for connected platforms to avoid the need for specific text to speech provision within consumer equipment by using cloud-based resources (e.g. speech files on a central server delivered to the device as required), particularly in the context of smart-tvs and in relation to on-demand content.

Speaking EPGs

As the Call for Input notes, EPGs with integrated text to speech have the advantage of being able to be operated using a limited number of buttons on a remote control; or in some cases by voice commands. We note that participants in Ofcom's roundtable hoped that speaking EPGs would be incorporated in consumer receivers, a view echoed by a focus group of visually-impaired viewers convened by a pay TV operator. They preferred the EPG to be accessible through the TV, rather than through secondary devices.

We also note the trials conducted by the Australian Government involving customers who were blind or had a vision impairment. Among other things, the research found that: nine out of ten respondents (88%) had adopted the 'talking' remote control as their main remote control, nearly three quarters of trialists (71%) rated it as excellent or very good; the two most useful functions of the 'talking' set top boxes (STB) were the 'talking' menus (70% rate these as very or quite useful), and the 'talking' programme guides (62%), particularly amongst people with a sight impairment and even more so amongst those participants in the research that were blind. Importantly, there was a significant increase in people's enjoyment of watching TV amongst visually impaired, blind and seeing viewers: two thirds of visually impaired, blind or seeing respondents (67%) said that their enjoyment of watching TV had increased 'a lot' or 'a bit' as a result of receiving the 'talking' STB; amongst visually-impaired viewers the figure was 63%, blind viewers 75% and seeing viewers 71%.

We note that the Call for Inputs states that the instructions currently provided with speaking EPGs are not easily accessible and require help from a sighted person to set up. However we do not regard this as a major stumbling block - instructions can be improved and a percentage of the population already require assistance from family, friends or others to set up or retune TVs. We also look forward to hearing responses from set top box manufacturers in relation to how larger production runs could help to bring costs down.

Conclusions

Given that the technology for speaking EPGs is not new, complicated or particularly expensive, we support their wholesale introduction on the basis of the fairness agenda.

We would be opposed in principle to allowing their introduction on a piecemeal basis. Although Ofcom's powers only extend to the use of EPGs in relation to the listing or promotion of programmes included in programme services (TV channels), there must be consistency within the EPG so that all available content - including catch-up or other on-demand services - is also accessible to people with visual impairments. The Authority for Television On Demand (ATVOD) already plays a role in relation to the provision of access services by on-demand programme service providers and it would be interesting to understand what part it could play in the provision of speaking EPGs by these providers.

In our view, speaking EPGs should not only be offered to people who already have some kind of visual impairment - it would be virtually impossible to ensure that you successfully reached everyone with partial sight or blindness and there is also the question of providing access for visitors to a household/other family members. The introduction of speaking EPGs as a mainstream application will also allow people to become familiar with them before they potentially develop visual impairments rather than having to adapt to another new technology with the onset of a visual impairment.

The Panel has argued for some time that provision for people with disabilities should be built into technology as standard, rather than as a separate piece of kit and we see no reason why EPGs should fall into a different category - particularly give the importance of TV to people with partial sight or blindness. It is also striking that in the Australian government trial cited at para 3.57, 71% of the sighted users said their enjoyment of watching TV had increased as a result of using the speaking EPG - another example of accessible design being a boon to all.

We would strongly oppose the concept of visually-impaired viewers being required to pay more than sighted viewers for the ability to use an EPG or substitute for the same purpose as sighted viewers.

In our view, speaking EPGs seem to provide the best solution to the difficulties encountered with conventional EPGs by some people with partial sight or blindness, and we believe that this initiative should be implemented as soon as possible.

However, we also need to be examining all ways in which access for blind and visually impaired people can be delivered. As part of this, we encourage app developers to build in accessibility as standard to as wide an extent as possible and for text-to-speech and voice recognition software to be used in as many devices as possible, with the hope that this software will become ubiquitous soon, and not just in purely communications or entertainment settings.