

Response from Royal National Institute of Blind People (RNIB) to the House of Lords Select Committee on Communications call for evidence on Digital switchover of television and radio

1. About RNIB

1. As the largest organisation of blind and partially sighted people in the UK, RNIB is pleased to have the opportunity to respond to this House of Lords call for evidence.
2. 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.
3. As an organisation of blind and partially sighted people, we advocate for the rights of people with sight loss in each of the UK's countries. During the next five years we want to tackle the isolation of sight loss by focusing on three clear priorities, These are stopping people losing their sight unnecessarily, supporting blind and partially sighted people to live independent lives and creating a society that is inclusive of blind and partially sighted people.
4. 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.

2. Numbers of Blind and Partially Sighted People in the UK and their reliance on TV and radio

5. Research completed by Access Economics and Epivision estimates that there were a total of 1.8 million people with

partial sight and blindness in the UK adult population in 2008. The research predicts that by 2050 the numbers of people with partial sight and blindness in the UK will double (115 per cent increase over 2010), to nearly 4 million people.

6. Since our Needs Survey in 1991 showed that a large majority of blind and partially sighted people watch television², RNIB has taken an active role in highlighting TV access issues. It has worked to try to ensure access to programmes, services and equipment, both by direct work with broadcasters and manufacturers and by influencing legislation.
7. Blind and partially sighted people rely on and want to use television and radio as much as, and in some cases more than their sighted peers. This is evidenced by academic research. In 2006 Research the University of Birmingham³ found that the most popular at-home leisure activity for blind and partially sighted people is listening to the radio or to music with 91% and around 87 per cent of blind and partially sighted people regularly watch TV and videos or DVDs.

3. The strengths of the digital television switchover process

8. Blind and partially sighted people are being assisted with digital television switchover by the government Helpscheme that supports older and disabled people through the process. Because it delivers not only hands-on assistance, but also equipment, the help scheme has ensured that blind and

¹ RNIB research briefing (June 2009). Future sight loss UK: a study on the prevalence and cost of sight loss. Royal National Institute of Blind People. The prevalence of partial sight and blindness in 2008, and prevalence projections to 2050, were estimated using prevalence rates derived from the literature and population estimates calculated by Access Economics. The full research comprises 2 reports: Future Sight Loss UK (1): Economic impact of partial sight and blindness in the UK adult population. Report by Access Economics Pty Limited and Future Sight Loss UK (2): An epidemiological and economic model for sight loss in the decade 2010 to 2020. Report by Darwin Minassian and Angela Reidy, EpiVision. These reports can be found on

<http://www.vision2020uk.org.uk/ukvisionstrategy/page.asp?section=74>

² RNIB Needs Survey (1991) Blind and partially sighted adults in Britain: the RNIB Survey Volume 1, by Ian Bruce, Aubrey McKennell and Errol Walker

³ Doublas, G., Corcoran, C., Pavey, S. (August 2006) Network 1000: Opinions and circumstances of visually impaired people in Britain: report based on over 1000 interviews.

partially sighted people can get equipment that delivers audio description⁴. In addition, the standard equipment offer has to meet the core receiver requirements as specified by the government, and this has led to the procurement of equipment that is designed to be more suitable for disabled and older people than the equipment that is available in the wider market.

9. The Helpscheme has to date supported many blind and partially sighted people with very detailed hands-on assistance and RNIB welcomes the success of this scheme to date.

4. The weaknesses and suggestions for improvements to the digital television switchover process

10. Despite all of the mechanisms in place for digital switchover, blind and partially sighted people who can not see information and menus on the screen have been let down by the process of switchover as many are still unable to independently operate a digital television. In an analogue environment, using the television and selecting one of the available channels was fairly straightforward. In the digital television era, the user has to be able to navigate a multitude of channels and find out what is on via an on-screen electronic programme guide (EPG) and various TV settings can only be changed via on-screen menus.
11. Ofcom's 2008 research report⁵ confirms that many visually impaired people can not use on-screen information and on-screen channel guides. This is in sharp contrast with their experience regarding analogue TV equipment which with its limited channel line-up and simpler remote controls was very easy to use.
12. The inaccessibility on on-screen menus and EPGs can be resolved in the following ways:

⁴ Audio Description (AD) is a free and existing service that can transform the enjoyment of TV for people who have difficulty seeing what's happening on the screen. Like a narrator telling a story, an additional commentary describes body language, expressions and movements, making the story clear through sound.

⁵ Ofcom (25 July 2008), People with visual impairments and communications services, research document. <http://www.ofcom.org.uk/research/tv/reports/visual/visual.pdf>

- by providing accessible talking (text to speech) output of on-screen TV listings information and of electronic programme guides.
 - by providing talking (text to speech) output of on-screen TV menus
13. Because the UK Government did not have the courage to mandate text to speech for the Digital Switchover Help Scheme set top box when it specified the Core Receiver Requirements, blind and partially sighted people who can not access information on the TV screen are currently faced with digital television that is inaccessible. As a result, RNIB have had to invest over one million pounds to prove the concept, develop a text to speech digital TV product and bring a solution to the market.
14. Three regions of the country have now fully switched to digital television, most recently Granada, and blind and partially sighted people in these regions who can not see the TV screen do not have equipment that enables them to independently use the digital TV on-screen programme guides and menu systems. RNIB urges the government to ensure that the registered blind and partially sighted people who need a more accessible solution are retrofitted with a more accessible solution as soon as it becomes available, and that the more accessible solution with text to speech will also be made available to new recipients of the help scheme as soon as it is on the market.
15. Finally, the television switchover public communications campaign has been successful in ensuring that the key messages around switchover have been received by the majority of the population. There have been changes made to the literature circulated in relation to the Helpscheme following consultation with consumer organisations, including RNIB, which we have welcomed. However we think it would be beneficial to also advertise the help scheme and its benefits on a national scale, as many people still do not seem to realise that the help scheme equipment design and assistance is tailored to their needs and therefore do not realise the benefits the help scheme might have for them as compared to a high street purchase.

5. Suggestions in relation to the Government Plans for Switchover to Digital Radio

16. RNIB commissioned research into the design of DAB radio sets. This research highlights the needs of blind and partially sighted people and those with dexterity problems and the gaps in usability of equipment overall.⁶ The inaccessibility of the majority of devices on the market was highlighted, as well as the high cost of the equipment that has some accessibility features that would be of use to partially sighted people.⁷
17. The I2 Media research highlights that blind and partially sighted people rely more on radio for entertainment, information and company than sighted people and that blind and partially sighted respondents tend to own more radios than the sighted respondents.⁸
18. Just as is the case with digital TV, digital radio equipment is much more difficult to use than analogue radio equipment, and with the design trend to provide more information and navigational features via a screen, the same problems that blind and partially sighted people have with digital TV are re-occurring. They can be remedied by the same solution: text to speech output of menus and on-screen navigation guides. The results of the I2 Media research show that 90 percent of blind and partially sighted people using a digital radio without talking menus need help the first time they use their digital radios. 70 percent continue to need support for subsequent use, whereas this figure is less than 20 percent in the general population. The research also shows that talking menus gives blind and partially sighted people a level playing field and allow for independent radio use.⁹ However equipment will full voice output and talking

⁶ Freeman, J., Lessiter, J. & Ferrari, E. (2008) Research report: Are you really listening? The equipment needs of blind and partially sighted consumers for accessible and usable digital radio. See website http://www.gold.ac.uk/media/i2_RNIB_AreYouReallyListening.pdf

⁷ Fifteen DAB receivers were evaluated by Ricability in 2009. The product with the most accessibility features for partially sighted people was a Roberts Radio that retailed for £160. For the full evaluation reports see http://www.ricability.org.uk/consumer_reports/at_home/digital_radio/

⁸ Freeman, J., Lessiter, J. & Ferrari, E. (2008) Research report: Are you really listening? The equipment needs of blind and partially sighted consumers for accessible and usable digital radio, page 45-46.

⁹ Freeman, J., Lessiter, J. & Ferrari, E. (2008) Research report: Are you really listening? The equipment needs of blind and partially sighted consumers for accessible and usable digital radio, page 90-93.

menus is to date not available in the market, and there are no indications that it would become available any time soon. This is therefore a gap that would need to be filled by a government help scheme.

19. In 2008, The Consumer Impact Group subgroup of the Government Digital Radio Working Group (DRWG) reported on the consumer issues of the switch to digital radio.¹⁰ RNIB, as well as other organizations representing vulnerable consumers, contributed to this report and its recommendations should be implemented as the government progresses its plans for digital radio. The key recommendations about usability and about the assistance that blind and partially sighted people and other vulnerable groups would need with a switchover are quoted below:
20. Before migration could begin, additional research into radio users who are disabled, older people (both over 65 and over 75) and consumers from low income households is essential, since these people are likely to require particular assistance with migrating to DAB. This research should inform the development of plans for a help scheme, for effective labelling, for information and education campaigns and for developing easy to use products.
21. The findings and design recommendations from the independent research conducted for RNIB by I2 Media are endorsed by this group. The group urges the DRWG to ensure that these design considerations are taken into account in a possible help scheme, to ensure that the equipment that blind and partially sighted people have at switchover is fully accessible and usable given their specific needs. In addition, the group recommends that the design checklist items be considered in any future discussion about kite-marking of digital radio equipment.
22. In the absence of the finalised cost benefit analysis at this point in time, the group recommends that the cost of converting to digital radio for the average household, as well as the affordability for low income groups should be investigated. In

¹⁰ Digital Radio Working Group (DRWG), Consumer Impact Group
http://www.culture.gov.uk/images/publications/Consumer_Impact_Group_Report_to_DRWG.pdf.

addition, the current take-up amongst older people, disabled people and low-income households needs to be investigated. The group urges extreme caution with migration to digital radio should the uptake in these groups be found to be low or should the costs be considered to be prohibitive by any of these groups, unless an appropriate help scheme is in place.

23. The Group felt it important that a help scheme is available to all groups of people who need help with migration. The help scheme would need to also consider what sort of help it was providing i.e. DAB sets that are usable and accessible for the target group as well as learning opportunities and ongoing assistance on how to use them. Government should recognise and include the charities working in this area.

24. The group recommends that a kitemark or logo scheme would help to increase consumer confidence and be considered by the DRWG for early implementation. It should be backed by rigorous standards of performance for the products and should include criteria on future proofing, accessibility and usability for all, and energy efficiency information.

6. Summary of key points:

25. Research evidence shows that blind and partially sighted people heavily rely on television and radio.

26. The digital television switchover help scheme has ensured that more blind and partially sighted people than before have access to audio description.

27. The digital television switchover process has let blind and partially sighted people down because it does not provide an accessible talking solution for on-screen television menus and television programme guides. This has to be remedied as soon as an accessible solution becomes available, by retrofitting those blind and partially sighted people who have already switched with a more accessible talking solution and by offering the talking solution to help scheme recipients in those regions that are about the switch.

28. The benefits of the digital switchover help scheme should be more clearly communicated on a national scale.
29. Research evidence shows that there are specific consumer needs that must be addressed in relation to the usability of DAB radios, not only for blind and partially sighted users, but also for users with dexterity problems.
30. As digital radio equipment is more complex to use than analogue radio, blind and partially sighted people need text to speech output of menus and on-screen navigation guides to enable them to independently use their DAB radios.
31. This situation is recognised by other organisations in addition to RNIB and should be addressed in a digital radio switchover help scheme.

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