RNIB

See differently

Call for Evidence: Future of TV Distribution

About us

RNIB is the largest organisation of blind and partially sighted people in the UK and welcomes this opportunity to respond to the consultation. With blind and partially sighted people at the heart of everything we do, our community of over 33,000 people brings together anyone affected by sight loss. More than three quarters of our Board of Trustees are blind or partially sighted. We support, empower and involve thousands of people affected by sight loss to improve lives and challenge inequalities. We engage with a wide range of politicians, organisations and professionals to achieve full inclusion through improvements to services, incomes, rights and opportunities.

We campaign for the rights of blind and partially sighted people in each of the UK's countries. Our priorities are to:

1. Be there for people losing their sight.
2. Support independent living for blind and partially sighted people.
3. Create a society that is inclusive of blind and partially sighted people's interests and needs.
4. Stop people losing their sight unnecessarily.

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Consultation Response

1. How are audience demands and expectations evolving, and how does that vary for users of different TV platforms and different demographics?

Access services in the UK are embedded in a mature industry. There are legal quotas for 10% of broadcast content to be audio described, larger broadcasters have committed to describing 20% and the average AD across non-exempt channels in the first half of 2023 was around 30% [i]. Some audio description users are now asking for all content to be audio described and we have, in previous consultation responses, asked for all content to be accessible where possible. Audio description is no longer a

fledgling service and users have an expectation of accessibility on content. Users are now asking for improvements in the quantity, quality and availability across services and platforms and when a program doesn't have AD they are asking why. With live AD being available on some programs it is likely that this will soon be an expectation too with AD users wanting to experience the live programs that their sighted peers have enjoyed.

Netflix, Apple TV+ and Disney+ have likely contributed to higher expectations of AD by providing audio description on almost all their new content. Subtitles on video on demand services are usually customisable too which means users are used to being able to adjust the size and contrast of them.

Text to speech has been available in televisions for a decade and although support on VOD apps is patchy blind and partially sighted people are very aware of when it is missing. This is a common theme. When it has been demonstrated that an accessibility feature is possible blind and partially sighted people expect companies to make it available but BVOD apps, in particular, lack good integration with screenreaders built into phones and smart TVs and even some of the larger broadcasters lack AD on their VOD offerings. If watching BBC content, audio description may be available on the broadcast stream and on iPlayer after the event but is usually missing on the 'watch live' function of iPlayer.

The consultation document highlights that people with disabilities were twice as likely to use only DTT. This may be linked to the cost of having a disability in that people with sight loss are less likely to be in paid work and often need to make more expensive choices such as using taxis rather than busses due to the difficulty of navigation between bus stop and destination. With less disposable income people are less likely to pay for subscriptions. They will also be hampered, however, by the lack of accessibility in catchup services and the uneven accessibility across services and devices which can make accessibility appear to be unreliable. Adding to this perceived unreliability is the practice of uploading a full series to a catchup service but only audio describing the episodes as they are shown on TV. We still experience a lot of

complaints and confusion from our members who find that only the first few episodes of a series have AD.

Good experiences from VOD services have encouraged AD users to expect accessible services but the experience of accessibility is far more patchy.

2. What do audience trends mean for the financial prospects and sustainability of TV distribution platforms, and what are the key decision points over the next ten years?

RNIB is platform agnostic and focussed on the user experience of blind and partially sighted people. We note that services such as Samsung TV Plus can broadcast IP TV channels in a way that makes them appear in the standard EPG as if they were terrestrial channels. Some PSB owned catchup TV players also offer a function where viewers can ‘watch live’ and it is our understanding that this can be integrated into the standard EPG using HbbTV in the same way that Freeview’s Accessible TV Guide is accessed on channel 555. In discussions with broadcasters we have been told that broadcast bandwidth is expensive and this has been cited as a reason why audio description users get stereo rather than surround sound or have to use the red button to get the accessible version of content.

Considering all this, we can imagine a shift to IP delivered television for the larger broadcasters and Ofcom needs to be mindful of any detriment this could bring to end users. In order to be fit for purpose the process should be steered to ensure that accessing television is no more expensive, no more complicated, no less accessible, no less reliable, is no less available and retains the protections that viewers currently rely on.

DCMS are currently considering licensing ‘alternative EPGs’ which will mean that IP-delivered channels should already be covered by regulation ensuing accessibility and viewer protection.

The UK Universal service obligation for broadband recognises the right of UK citizens to a decent broadband connection [ii]. In the event that IP-

delivered TV becomes commonplace this minimum service level should be tested against the minimum requirements for TV distribution and upgraded if needed. This would need to ensure the speed, reliability and lack of complexity. The availability of broadband across the country should already be an aim of any universal service obligation. This would still mean IP-delivered TV is more expensive since it requires a paid-for broadband internet connection. If it was desirable and ISPs agreed then connections for IP-delivered TV could be zero rated so that traffic from broadcasters was free. The precedent for this is emergency phone calls from mobiles. ISPs may benefit from bandwidth being freed up or may consider that it is easier to sell a broadband connection to households that are already connected.

3. How do broadband networks and supporting infrastructure need to evolve to support resilient delivery of TV over the internet in the future?

The consultation document frames broadband resilience as a challenge for the future but for many blind and partially sighted people this is a very current issue. TTS (text-to-speech) is a feature built into many television receivers where text on the screen is read out by a speech synthesiser to enable a blind or partially sighted viewer to navigate menus and operate their television independently. We have seen a trend for cloud-based TTS where the text is sent off to a server and the speech is sent back to the user to be read out but this means that if your internet connection fails or is not fast enough you lose the ability to use your television. Broadband resilience is not just a pre-requisite for the future of IP-delivered content but it is a limiting factor on the accessibility of current broadcasting.

The consultation document highlights that many households do not have internet connections (7%) or have no fixed internet but have mobile connectivity (14%). Identifiable barriers for this include technical skills (connecting to a broadband router may be intimidating for some people), ideology (a perceived lack of need for the internet), cost and availability.

Research suggests that not being connected to the internet costs users in terms of missed savings [iii] and more and more services are only available online or provide a better level of service for users who are

online. It is in the interests of consumers that more people are enabled and encouraged to go online and this means tackling these identifiable barriers, especially those of cost, availability and a perceived lack of technical skills. For the general population this is not a question of solving the barriers to enable new delivery mechanisms for television but rather to enable participation with online services. This is more urgent for blind and partially sighted people who increasingly rely on these connections for their current TV accessibility.

4. In what ways might different types of 'hybrid' terrestrial and internet services deliver benefits for audiences and what risks may arise?

As previously mentioned it is our understanding that IP-based channels can be delivered in such a way that users would be unaware that they were not terrestrial broadcasts. In the past, Standard Definition and High Definition channels have been linked to enable viewers to choose which version of a program they want to watch and if it is also possible to link the IP-delivered channel to the traditionally broadcasted one then this could provide an intuitive experience for viewers.

The ability to use more or less bandwidth depending on the user preferences could enable improved accessibility services. Broadcast mix audio description sends the main audio twice; once with the AD mixed in and once without. This has lead to broadcasters providing inaccessible audio in 5.1 surround sound and broadcast-mix AD in 2.1 stereo. With IP based delivery it may not be necessary to send the inaccessible version to AD users meaning broadcasters can send a 5.1 mix with audio description and use less bandwidth. If the user experience is customisable then some blind viewers may only want to receive the audio creating an even greater saving in bandwidth since the video would not need to be streamed to them.

Accessibility needs to be considered from the start. Subtitles should be text based, rather than image based, to allow customisation by viewers. Players should allow multiple audio tracks, which would ideally be object based, to allow for audio description and other potential audio-based access services. Streams should ideally be object based with a high degree of personalisation possible. As part of the code on television

access services Ofcom should record and share best practice in IP delivered TV.

RNIB understand the use of hybrid in the context of this question to mean IP broadcast channels being received alongside traditional broadcast channels. Hybrid has sometimes been used to mean that the IP delivered content augments the traditionally broadcast content and we have generally argued against this. Data transmitted over the internet is currently less reliable than that transmitted over terrestrial, satellite and cable broadcasting and it is important that accessibility features are as robust as the rest of the broadcast.

5. Given the sharing of infrastructure, what would the implications for other sectors be if there was a change to the use of digital terrestrial television (DTT)?

A move to an IP infrastructure for television may mean the loss of DAB radio capability. DAB radios however have remained largely inaccessible. The greatly expanded choice of stations that DAB provides creates a navigation problem for blind and partially sighted people because currently manufactured DAB radios do not read out the station names. A largescale move to IP based radio may benefit people with sight loss as radio receiver software could be built into smartphones and computing devices that already have accessibility built in. Mobile network providers may consider free passthrough for internet radio content if they gain access to the terrestrial TV bandwidth.

6. What coordination and planning across the value chain might be necessary to secure good outcomes for audiences and key providers over the long term?

If DCMS decides to bring alternative EPGs under Ofcom's remit then any sufficiently large enough TV-like service will need to comply with Ofcom's regulations in the same way that traditional broadcasters currently do.

The DTG (Digital Television Group) which manages the D-Book has successfully coordinated television manufacturers and broadcasters to enable cooperation in innovation without hindering competition. It is the most logical home for coordination work around IP based television since many of the required participants in future discussions are already

members. Membership of the DTG requires a fee depending on the size and nature of the organisation with the benefits being access to the specification for broadcasting using the Freeview brand.

Coordination activities will include ensuring the communication networks are ready to carry greater volumes of TV content which should sit easily in Ofcom's efforts to create a resilient, universal communications network.

Smooth transition to IP-delivered TV will require Smart TVs which can receive IP delivered content or set-top boxes that can act as receivers. These will need to be sufficiently common among viewers for any official switchover to occur. Ofcom should continue to monitor take-up of these technologies.

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i The average of achieved percentage of AD for non-exempt channels in the first half of 2023 was 30.39%
ii https://www.ofcom.org.uk/phones-telecoms-and-internet/advice-for-consumers/broadband-uso-need-to-know last checked 11/12/23
iii https://www.vodafone.co.uk/newscentre/news/fear-of-going-online-could-cost-over-65s-almost-1000-a-year last checked 11/12/23