



See differently

# Consultation on the allocation of an LCN for the Freeview Accessible TV Guide

## 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.

RNIB welcomes the opportunity to respond to this consultation. Blind and partially sighted people have expressed a great deal of interest in IoT technology and its potential benefits for them.

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## Royal National Institute of Blind People

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## The importance of television to blind and partially sighted people

Since our Needs Survey in 1991 showed that a large majority of blind and partially sighted people watch television<sup>1</sup>, RNIB has taken an active role in highlighting TV access issues. We have worked to try to ensure access to programmes, services and equipment, both by direct work with broadcasters and manufacturers and by influencing legislation and regulation.

In this digital age, being able to watch TV remains important to blind and partially sighted people. In 2006 Research by the University of Birmingham<sup>2</sup> found that around 87 per cent of blind and partially sighted people regularly watch TV and videos or DVDs.

In RNIB's "Update on the inclusive society 2013" report respondents were asked to select from a list of statements about what kind of impact fully accessible television and radio would have on their lives:

- 56% said that it would make them more independent;
- 56% said it would make them happier about life;
- 56% said it would make them feel less socially isolated;
- 51% said it would make them feel better about their sight loss

In addition 68% of respondents selected at least one of these impact statements and 38% selected all four of them.

## Consultation Responses

RNIB understands that as an EPG service provider Digital UK has a duty under the Ofcom EPG Code to "...use reasonable endeavours to secure so far as practicable..." an accessible EPG including text-to-speech, filters for AD and sign language, a high contrast option and magnification or text enlargement. Since Digital UK does not directly control the end-user equipment RNIB also understands that this is much harder for Digital UK than for EPG providers which build or commission their own end-user equipment. RNIB congratulates Digital UK on a truly innovative solution which will make the TV viewing experience accessible on all Freeview Play devices. There is still immense value in TV manufacturers providing built-in accessibility to make the rest of the functionality of a Smart TV accessible but the Freeview Accessible TV Guide improves

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

<sup>2</sup> Douglas, G., Corcoran, C., Pavey, S. (August 2006) Network 1000: Opinions and circumstances of visually impaired people in Britain: report based on over 1000 interviews.

accessibility and choice for the Freeview platform. This will make Freeview the most accessible TV platform in the UK.

## **The LCN used for the accessible TV Guide**

RNIB considers that both 555 and 258 are very good options for blind and partially sighted people being memorable and easy to find by touch. 555 would be slightly preferable if all else were equal however the clash with Zee TV on TalkTalk could cause problems. The consultation document states that:

“Both services appear in the listing (i.e. TalkTalk’s viewers would see two 555s in the list), and it is not possible to scroll up from one of the services to the other. However, viewers will be able to scroll down, or use the number keys to turn to a different channel.”

If a user was relying entirely on sound to navigate then they would need to remember a string of actions to get to the accessible TV Guide and unless the box itself speaks this would have to be done without any audio feedback. Blind and partially sighted people are used to these types of workarounds but considering an effort is being made to ensure the TV Guide is easy to open this could be undermined if some users have to rely on a lengthy workaround.

The consultation document states that YouView could resolve the clash with a software update or TalkTalk could remove the issue by moving Zee TV to a different LCN. Whether 555 or 258 is the easiest for blind and partially sighted people therefore relies on the willingness of YouView and TalkTalk to make these changes. YouView may even be able to provide a direct shortcut to the Freeview Accessible TV Guide making the process of opening it even easier.

Whereas RNIB considers both 555 or 258 to be good channel numbers for the new accessible TV guide which one is best for blind and partially sighted people depends on whether YouView or TalkTalk are willing and able to resolve the clash with Zee TV. If they are then once that is done 555 would be the best option. Otherwise 258 would be a very memorable option and would be almost as good.

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