



Personalisation: Everybody wants to choose. And we should be able to!

BEREC Accessibility Workshop, 5th October 2016, Vilnius
Pilar Orero, EDF Expert Group

European Disability Forum EDF

- Represents 80 million persons with disabilities
- Umbrella organisation with national councils and European federations
- Represents diversity of persons with disabilities
- Values based on human rights



Legislation and human rights

EU is one of 167 state parties to the convention on the rights of persons with disabilities

General comment 2, on article 9 accessibility
“unconditional obligation”

As long as goods, products and services are open or provided to the public, they must be accessible to all, regardless of whether they are owned and/or provided by a public authority or a private enterprise

Minimum standards must be developed in close consultation with persons with disabilities and their representative organizations

Who is the user?



What is the potential of telecommunications for persons with disabilities?

- Independent living
- Autonomy in decision-taking
- Inclusion in all aspects of life
- Participation in society
- Safety

Equal access and choice to, and affordability of:

- networks and services
- equipment

Comply with the UN CRPD obligations
(explanatory remarks UN CRPD
Committee General Comment No. 2)

Potential to create new barriers and discrimination



Personalisation

Access to information is a right that Europe and 166 states have promised to fulfil.

By designing the digital part of society for users with disabilities it will work better for the whole population.

For example: Catalan TV personalised subtitles.

But when we forget the end user...



Barcelona Vodafone Example

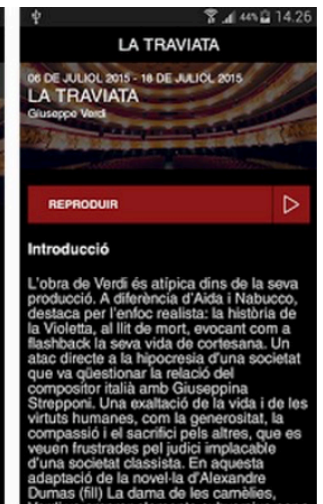
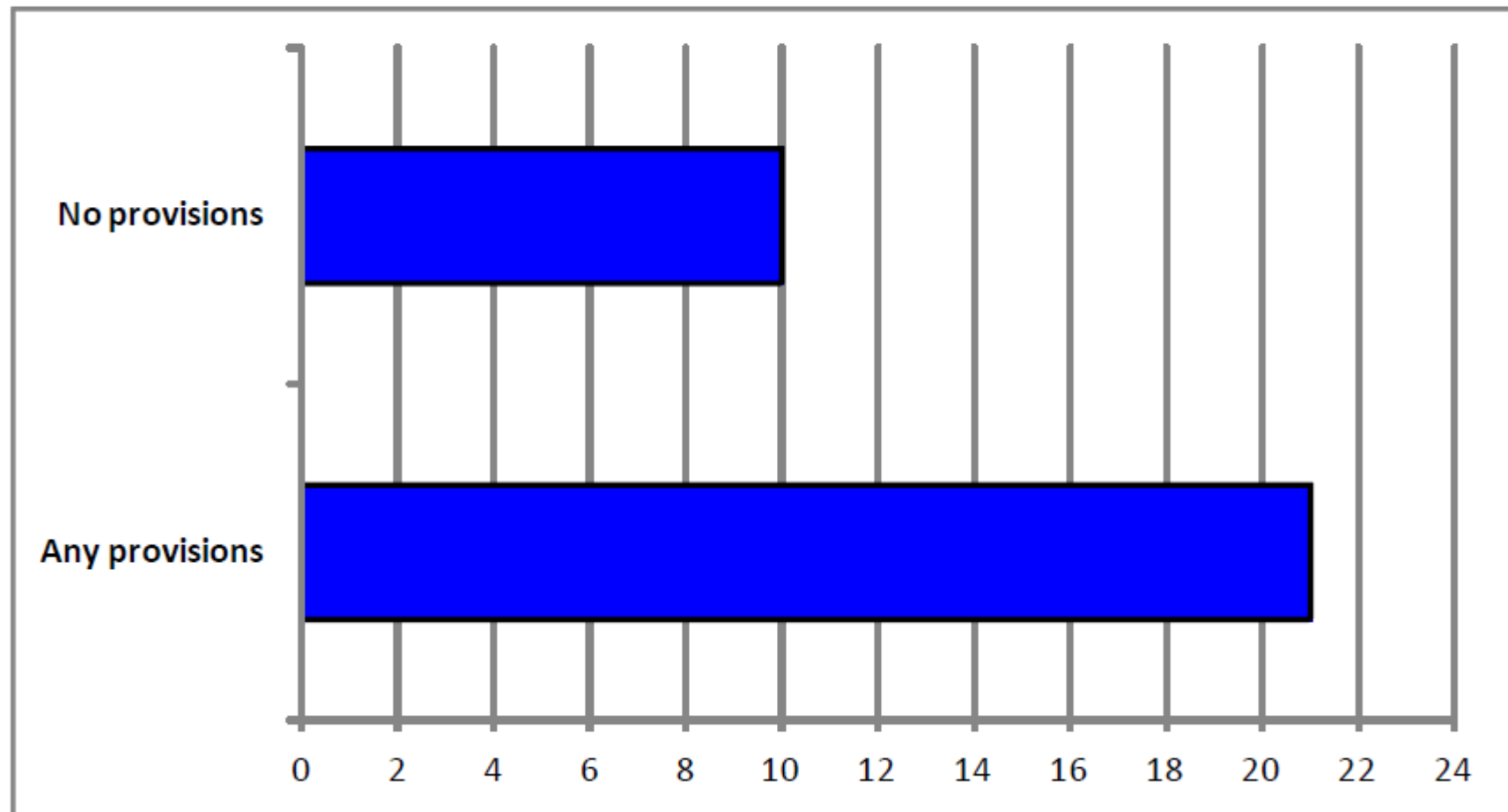


Figure 3-1 No of countries with any provisions concerning accessibility of directory services (n=31)



Accessible content increasing but low



Most MS have subtitles. Some only for translated content
FR, NL, UK 100 per cent



Most MS 0 per cent sign language interpretation
Portugal leading the way 16-7 percent 3 channels



Most MS 0 per cent audio description, increase after regulation
UK leading 15 – 24 per cent several channels



Data for spoken subtitles missing
Spoken subtitles required in for example Finland

Source: European Commission study 2013

Note: Icons not standardised


European legislation

- European Accessibility Act

- AVMSD - under revision REFIT

Article 7 – deleted by CULT (European Parliament Committee on Culture and Education)

26/09/2016 - Public hearing of the Committee on Culture and Education about the Audiovisual Media Services Directive revision Article 7 is replaced by the following:




Article 7

1. Member States shall ensure that media service providers under their jurisdiction make their services continuously and progressively more accessible to people with a visual or hearing disability aiming for an almost complete accessibility by the end of 2027.


2. With regard to the implementation of this Article, Member States shall encourage the development of self- and co-regulatory codes of conduct. The Commission and ERGA shall encourage media service providers to exchange best practices on self-regulatory systems across the Union.

3. By ... [three years after the entry into force of this Directive] and every three years thereafter, the Commission shall submit to the European Parliament, to the Council and to the European Economic and Social Committee a report on the application of this provision.'



Committee on the Internal Market and Consumer Protection 21/09/2016

Whilst vital to continue efforts to mainstream accessibility, Article 7 of the current AVMSD should be retained and improved with references to AVMS deleted from the European Accessibility Act (EAA). The EAA, which mixes both hard and soft aspects of AVMS delivery¹ does not sufficiently recognise the realities and needs of the audiovisual media sector, which could stifle genuine innovation that will, in future, be best placed to meet individual consumer needs.




Conclusions

Renew legislation to match new social needs, demography and technology

- **Strengthen accessibility requirements in AVMS directive**
making accessibility an integrated part of media production
- **European Accessibility Act should cover Audiovisual media covering whole value chain** with a user perspective
- **Monitoring of accessibility usability** with independent **quality indicators** involve users in the evaluations
- **Standardisation, research and innovation with users involved**
link accessibility to development of Language technology
- **Encourage research and Forum for multi stakeholder exchange**
pave way for innovative accessible converging media
- EU leading in Media Accessibility worldwide:
 - A) Number of languages → Promoting multilinguism
 - B) Funding research → 2016 year over 10M EU for research
 - C) Social cohesion

Recommendations:

At EU level:

- Ongoing mechanism to provide guidance to NRA's
 - Regular and harmonised benchmark reporting exercise both on access and choice – publicly available and in accessible formats
 - Involve users' organisations in BEREC Working Groups
 - Raise awareness on the rights of EU citizens concerning accessibility on e-communications
- 

Related documents:

- [UN CRPD](#), and [General Comment No. 2 – Article 9](#)
- [EDF presentation at the BEREC Accessibility Workshop](#), October 2015
- [EDF Position on Indicators to Check and Assess Accessibility of Telecommunications for Persons with Disabilities](#), April 2012
- [EDF Toolkit on the Telecoms Package](#), September 2011
- [ANEC/EDF Answer to the BEREC public consultation on Electronic Communications Services: Ensuring Equivalence in Access and Choice for Disabled End-Users](#), November 2010
- [EDF position on the revision of AVMSD](#)
[EDF position papers eg on green paper on converged audiovisual world](#)
[FRA accessibility standards for audiovisual media](#)
[EPRA comparative accessibility report](#)
- Contact: alejandro.moledo@edf-feph.org



THANK YOU

For more information please contact EDF Secretariat:
Alejandro Moledo, EDF New Technologies and Innovation officer
alejandromoledo@edf-feph.org