

Representing: Organisation (Sense)

Question 1: Do you agree with Ofcom's proposed changes to the way we collect data, and do you have any further comments?

Yes, Sense agrees with the proposal to collect data on a twice yearly basis. Treating on demand in the same way as broadcast reflects the consumer's perspective that accessibility is equally important, however they access the content.

Clarity and consistency into the regulatory approach to TV like content, is important, however it is broadcast.

Question 2: Do you agree with Ofcom's proposed changes to the type of data we collect, and do you have further comments?

Yes, Sense agrees with the proposal to collect data by branded service, as long as the consumer continues to have access to information to make choices, assess the broadcaster, the branded service, the platform and device they use.

The distinctions between broadcasters, branded services, platforms and devices are not always clear even to those who follow the issues closely. Choices made by each part of the supply chain can affect the access services consumers are able to use, and therefore information about each element is really important.

Sense is wary of excluding service providers based on the type of content they produce, though we fully appreciate the arguments laid out in the consultation document, and support an approach that prioritises action where consumers will benefit most. Our preference would be to treat all providers in the same way, and in the long term the criteria used for broadcast content are preferable (audience share and service size)

Question 3: Do you agree with Ofcom's proposed changes to the way we publish data, and do you have further comments?

Yes, Sense agrees with the proposal to publish data on a biannual basis.

It is important consumers are easily able to find, access and use the data published, including for those who need particular formats, or who use assistive technology to access information. This will require innovative ways of presenting and promoting the information, including at point of sale for subscription TV packages and consumer facing reports.