A1. Consultation questions

Q1   Do you agree with our assessment of the key issues involved to inform regulations in this area?

yes

Q2   Are there other 'access services' which you believe should be specified in any regulations?

no

Q3   Do you have views on the relative importance of sign-presented programming and sign-interpreted programming?

no

Q4   To what extent can or should regulations require usability features including (but not necessarily limited to): provision of information; accessible catalogues; and best practice relating to the creation, selection, scheduling and presentation of accessible programming? If you do not believe that these features should be required by the regulations, should the regulations require Ofcom's resulting code to give guidance on these issues?

Should include these. For AD it's difficult to access the services its on. Finding what has access services is difficult. Also tablets include voiceover and they help doing that – Sky does not. Platforms should do the same.

Q5   Do you agree that audience benefit, cost, and practicability are appropriate grounds for differentiating services/content for the purposes of regulations? Are there other grounds on which you believe ODPS programmes/services should be differentiated (prioritised, excluded, or subject to different requirements)?

No

Q6   Should the regulations impose more stringent requirements on public services broadcasters' ODPS than on ODPS provided by others?

Yes – BBC have very limited AD on its normal channels. BBC Should be putting more on their online services.

> Q7   Should the regulations limit accessibility requirements to programmes/services which have previously been broadcast with access services, or impose more stringent requirements on these programmes/services?

No – Sky in particular is bad for this as you can't catch up with a service you've already seen.

> Q8   Do you consider that ODPS programmes/services should be excluded from the full requirements on the grounds of audience size? If so, should there be different requirements for excluded programmes/services?

no

> Q9   Should the regulations impose different accessibility requirements on ODPS made available via certain platforms, and if so which?

no

> Q10 Do you have any views or information on appropriate and available means of measuring the audience impact of ODPS?

no

> Q11 Are there particular types/genres of programming which should be excluded from requirements, or subject to reduced requirements, on the grounds of limited audience benefit?

NA

> Q12 Do you consider that ODPS programmes/services should be excluded from the full requirements on the grounds of affordability? If so, should there be different requirements for excluded programmes/services?

no

> Q13 Do you have any views or information on appropriate and available means of quantifying: ODPS-specific revenue; VOD specific revenue; and costs associated with ODPS access services?

NA

> Q14 If you are an ODPS provider, do you have information on the likely costs involved in providing access services on your ODPS?

NA

Q15 Do you consider that ODPS programmes/services should be excluded from the full requirements on the grounds of technical difficulty? If so, should there be different requirements for excluded programmes/services?

No – because (example of Sky) have been trying to get AD on demand but tried subtitled first and then had to take the full difficulties putting subtitles on but managed to fix that. That was 18 months ago, they always trial their subtitled first, but don't rollout AD. Approach to these technologies should be consistent.

Q16 Should regulations include quotas on percentages of programming available with access services? If so, what should the quotas be? If not, what other methods do you consider appropriate for the purpose of setting access service requirements for ODPS?

100%

Q17 Do you think that there should be a phased introduction of requirements? If so, please give details.

No – not phased. Immediate.

Q18 Do you think that the introduction of requirements should prioritise particular types of ODPS programmes or services?

Box-sets and movies

Q19 Should ODPS providers be able to propose alternative arrangements, and if so what type of arrangements?

no

Q20 Do you have any other comments or information you wish to share in relation to the drafting of regulations on ODPS accessibility?

no