

## Consultation response form

### Your response

Question 1: Do you agree with our assessment of the key issues involved to inform regulations in this area?	[X]
Question 2: Are there other 'access services' which you believe should be specified in any regulations?	No
Question 3: Do you have views on the relative importance of sign-presented programming and sign-interpreted programming?	Red Bee Media believes that both sign-presented and sign-interpreted programming fulfil a role in providing an accessible ODPS service.
Question 4: 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?	Left blank
Question 5: 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)?	[X]
Question 6: Should the regulations impose more stringent requirements on public services broadcasters' ODPS than on ODPS provided by others?	[X]
Question 7: 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?	[X]

<p><b>Question 8: 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?</b></p>	<p>[X]</p>
<p><b>Question 9: Should the regulations impose different accessibility requirements on ODPS made available via certain platforms, and if so which?</b></p>	<p>[X]</p>
<p><b>Question 10: Do you have any views or information on appropriate and available means of measuring the audience impact of ODPS?</b></p>	<p>[X]</p>
<p><b>Question 11: 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?</b></p>	<p>Red Bee Media believes that, where practical or appropriate, any exclusions should mirror or relate to the exclusions provided to linear TV services.</p>
<p><b>Question 12: 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?</b></p>	<p>[X]</p>
<p><b>Question 13: Do you have any views or information on appropriate and available means of quantifying: ODPS-specific revenue; and costs associated with ODPS access services?</b></p>	<p>Left blank</p>
<p><b>Question 14: If you are an ODPS provider, do you have information on the likely costs involved in providing access services on your ODPS?</b></p>	<p>Not applicable.</p>
<p><b>Question 15: 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?</b></p>	<p>[X]</p>

<p><b>Question 16: 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?</b></p>	<p>[X]</p>
<p><b>Question 17: Do you think that there should be a phased introduction of requirements? If so, please give details.</b></p>	<p>Red Bee Media believes that a sudden introduction of un-phased regulation would be highly disruptive for all parties, and as such would recommend a phased introduction.</p>
<p><b>Question 18: Do you think that the introduction of requirements should prioritise particular types of ODPS programmes or services?</b></p>	<p>In keeping with the spirit of the Code, priority should be given to services, programmes or platforms that facilitate the highest audience reach within the shortest span of time.</p>
<p><b>Question 19: Should ODPS providers be able to propose alternative arrangements, and if so what type of arrangements?</b></p>	<p>[X]</p>
<p><b>Question 20: Do you have any other comments or information you wish to share in relation to the drafting of regulations on ODPS accessibility?</b></p>	<p>[X]</p>