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?Availability of AD on Smart Devices, not just via TV.

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?It's crucial to have accessible, audio, content in the likes of EPGs, TV guides and any info on programmes watched. 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?Yes

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)?They should be the same as standard tv as they carry advertising and offer programmes that people may miss. No one with a visual impairment should miss out on the opportunity to view these with Audio Description, after all they pay a tv licence and, possibly, a subscription fee to the provider like sighted consumers.

Q6 Should the regulations impose more stringent requirements on public services broadcasters' ODPS than on ODPS provided by others?All should follow the same guidelines, content is still delivered with the only difference being the convenience of when it is accessd and the same would apply for own productions, eg NetFlix produced content.

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?All should have the same restrictions, guidelines and legislation.

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?All ODP services should follow the same guidelines, they are commercial organisations and many charge for access to the viewer.

Q10 Do you have any views or information on appropriate and available means of measuring the audience impact of ODPS?A requirement for ODP providers to source feedback, from their customers, on their access services and share with regulators and users. This could be done by asking, for example, blind customers to consent to an annual survey or offer a feedback link/portal.

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?Things like game shows and chat shows, where the audio content is heavy.

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?

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

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

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, they provide these, eg Audio Description, to a certain extent and the costs of creating AD have reduced over the past few years.