

## Your response

Question	Your response
<b>Question 1: Do you agree with our suggested approach to assessing exemptions for affordability, i.e. using overall turnover?</b>	[✕]
<b>Question 2: Do you agree with our suggestion that 'small companies' should be exempted from the requirements?</b>	[✕]
<b>Question 3: Do you agree that a threshold level of 1% for the remaining ODPS providers is proportionate?</b>	[✕]

<p><b>Question 4: If you are an ODPS provider, can you provide any information on the costs of providing access services, including in relation to the various platforms by which services are delivered?</b></p>	<p>Confidential? – No</p> <p>N/A</p>
<p><b>Question 5: If you are an ODPS provider, can you provide any information on the proportion of your ODPS catalogue which is replaced over a given month/ year (rather than archived)?</b></p>	<p>Confidential? – No</p> <p>N/A</p>
<p><b>Question 6: If you are an ODPS provider and have a broadcast television service, can you provide any information on the proportion of your ODPS catalogue which is repurposed from broadcast television over a given month/ year?</b></p>	<p>Confidential? – No</p> <p>N/A</p>
<p><b>Question 7: If you are an ODPS provider with more than one ODPS, can you provide any information on the hours of unique content provided across all your ODPS over a given year?</b></p>	<p>Confidential? – No</p> <p>N/A</p>

<p><b>Question 8: If you are an ODPS provider, can you provide any information on how much advertising/ subscription revenue you would expect to gain from providing access services on your content?</b></p>	<p>Confidential? – No</p> <p>N/A</p>
<p><b>Question 9: If you have provided answers for any of Question 4-8 above, would you be happy for Ofcom to share this information with Government on a confidential basis, for the purpose of their impact assessment to inform the drafting of regulations?</b></p>	<p>Confidential? – No</p> <p>N/A</p>
<p><b>Question 10: Do you agree with our suggested approach to making exemptions on the basis of audience size?</b></p>	<p>Confidential? – No</p> <p>Red Bee Media thinks this is a valid approach. However, we recognise that ODPS will often enable niche content of particular interest to relatively small audiences. We also recognise that these audiences will also have accessibility requirements.</p> <p>Therefore we would encourage a flexible approach to exemptions, designed to ensure maximum accessibility even across ODPS with relatively small audiences.</p>
<p><b>Question 11: Do you agree with our suggested threshold for assessing audience size?</b></p>	<p>Confidential? – No</p>

	<p>Red Bee Media thinks this is a valid approach for assessing audience size.</p>
<p><b>Question 12: If you are an ODPS provider, do you have information on unique visitors to your service, including by the platforms through which your service is delivered? Would you be prepared to share estimated audience metrics with Ofcom on a confidential basis, for use in our impact analysis? (Please provide if so)</b></p>	<p>Confidential? – No</p> <p>N/A</p>
<p><b>Question 13: Do you agree with our suggested approach to assessing exemptions on the grounds of technical difficulty?</b></p>	<p>[X]</p>
<p><b>Question 14: If Ofcom is given discretion in this area, do you agree with our suggested approach to making exemptions for particular genres/ types of programmes?</b></p>	<p>Confidential? – No</p> <p>Red Bee Media agrees with this approach and feels that it should be applied consistently across both ODPS and linear services.</p>
<p><b>Question 15: If Government wants to specify which types of programming should be exempt in the regulations, do you agree with our provisional view that the exemptions should only be for audio</b></p>	<p>Confidential? – No</p> <p>Red Bee Media believes that editorial exemptions should be applied consistently across both ODPS and linear services.</p>

**description on news and music programmes?**

**Question 16: Do you have any views on our proposed approach to determining applicable signing requirements?**

[X]

**Question 17: Do you prefer Option A or Option B for determining the levels of each signing requirement?**

[X]

**Question 18: What alternative signing arrangements do you think should be in place for ODPS? Should this be an extension of the current arrangement with BSLBT?**

[X]

<b>Question 19: Do you believe there should be an exemption for signing in cases where it allows ODPS providers to offer subtitling and AD?</b>	[X]
<b>Question 20: Do you have any information on the relative costs of providing sign-interpreted or sign-presented programming? If so, please indicate whether you would be happy for Ofcom to share this information with Government on a confidential basis, for the purpose of their impact assessment to inform the drafting of regulations.</b>	[X]
<b>Question 21: Do you agree with our suggested approach to setting targets across ODPS services and platforms?</b>	[X]

<b>Question 22: Do you agree with our suggested approach to implementing the targets?</b>	[X]
<b>Question 23: If you are an ODPS provider, would you be able to provide Ofcom with the information outlined in 5.18 to 5.21 on a regular basis (e.g. every two years)?</b>	Confidential? – No N/A
<b>Question 24: Do you have any comments on the cost assumptions included in Annex 2?</b>	[X]
<b>Question 25: Do you agree with our assessment of the impact of our proposals on the relevant equality groups? If not, please explain why you do not agree.</b>	[X]