

Your response

| Question | Your response |
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| <p>Question 1: Do you agree with our proposed principles and methods for assessing the number of UK users of a TSS?</p> | <p>Confidential? – N No comment</p> |
| <p>Question 2: Do you agree with our proposed principles and methods for assessing whether the number of UK users of a TSS is significant?</p> | <p>Confidential? – N No Comment</p> |
| <p>Question 3: Do you agree with our proposed principles and methods for assessing the manner of use of a TSS?</p> | <p>Confidential? – N The manner of usage of a TSS is an important factor in determining the applicability of any requirements. However, we are concerned that gathering this information may become an undue burden on TSS providers. It is important that any data collected from them is proportionate and only in line with data already held for business purposes.</p> |
| <p>Question 4: Do you agree with our proposed principles and methods for advising on the functions that a TSS is capable of carrying out, or may be made capable of carrying out?</p> | <p>Confidential? – N Support for a TSS function largely depends on the broadcaster or content provider. There are many scenarios where a broadcaster might not find it viable to invest time and money in ensuring compatibility with a TSS. For instance, it may not be feasible to support older hardware or to develop capabilities for a smaller TSS. While Ofcom’s ‘threshold’ proposals could partially address this issue, it is crucial to remember that, despite the commercial influence of the TSS (and ITS), the decision to develop compatible functionality ultimately lies with the broadcaster or provider.</p> |
| <p>Question 5: Do you agree with our proposed principles and methods for assessing any other additional matters?</p> | <p>Confidential? – N No comment</p> |

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| <p>Supplemental Question 1: We welcome views on this potential use of ‘number of TSS installed on ITE devices in UK homes’ as a proxy, and on the potential use of an absolute number of UK users when setting a threshold for significant use in our first report setting out our recommendations on designation of TSS. Please provide evidence to support your views.</p> | <p>Confidential? – N</p> <p>No comment</p> |
| <p>Supplemental Question 2: We welcome views on this potential approach to assessing the manner of use of a TSS for our first report setting out our recommendations on designation of TSS. Please provide evidence to support your views.</p> | <p>Confidential? – N</p> <p>No comment</p> |
| <p>Supplemental Question 3: We welcome views and supporting evidence for our first report setting out our recommendations on designation of TSS on:</p> <ul style="list-style-type: none"> • The number of people using older versions of TSS that are no longer supported by their provider; • When TSS providers release a new version of their service, for how long do they normally support it? • When IPS providers release a new version of their service, for how long do they normally support it? • The technical limitations and/or costs that are associated with supporting older versions of TSS and older versions of IPS still available in the market. | <p>Confidential? – Y [redacted]</p> |