

Your response

Question	Your response
<p>Question 1: Do you agree with our proposal to continue to apply guidance to BBC UK Public Television services, and not to introduce guidance for the BBC's radio programme services for the foreseeable future?</p>	<p>As a public service broadcaster, it is important that the BBC sets an example in the accessibility of television services. Continuing to apply guidance to the BBC in this way, therefore, encourages the broadcaster to be an exemplar of best practice.</p> <p>With regard to radio, we appreciate that there are few examples of accessible radio services for Deaf people; however we suggest that greater research is undertaken in this area – in consultation with Deaf people – to understand more about possible solutions and alternatives, such as radio captioning, transcribing and emergency alerting, and to learn from international examples (e.g. Verb8tm/National Public Radio project in the USA).</p>
<p>Question 2: Do you agree with our proposal to consider relevant guidance in relation to the BBC's UK ODPS separately?</p>	<p>We recognise that on-demand TV poses a set of distinct policy challenges to linear TV, and so it would seem appropriate to consider guidance relating to the BBC's on-demand services separately. As such, we look forward to Ofcom's forthcoming consultation on the proposed 'On-Demand Code' and related guidance concerning the BBC's on-demand services.</p>
<p>Question 3: Do you agree with our approach to maintain the existing targets and guidance for the BBC's UK Public Television Services?</p>	<p>We agree with Ofcom's proposal that the BBC should continue to be subject to the highest subtitling target of all broadcasters, at 100%.</p> <p>With regard to signed programmes, we welcome the fact that the BBC meets its target of 5%. Further, it is encouraging to see that in some years the BBC has even surpassed this target. We also recognise that signed programming is more expensive to provide than subtitling, for example.</p> <p>However, whilst we agree with Ofcom that the BBC should continue to be expected to exceed this target wherever possible, we would like to see more concrete steps taken to require the BBC to go above and beyond the 5% target. We</p>

	<p>do not believe that the current target should simply stagnate at 5%: rather, the BBC should be encouraged to show <i>continuous and progressive</i> improvement in the accessibility of its television services, including signed programmes. This should, ideally, see an incremental increase in the percentage of programmes that are signed, year on year.</p>
<p>Question 4: Do you agree with the proposed modifications of the TV Access Code set out in Annex 7 to ensure it applies to BBC UK Public Television Services under the 2016 Agreement?</p>	<p>-</p>
<p>Question 5: Do you have any other comments regarding our proposals in relation to how the BBC should make its UK Public Services accessible under the 2016 Agreement?</p>	<p>-</p>
<p>Question 6: Do you have any comments on our proposed changes to Ofcom’s Code on Television Access Services?</p>	<p>-</p>
<p>Question 7: Do you have any comments on our proposed amendments to the guidance in relation to the dates by which broadcasters should apply to Ofcom for alternative signing arrangements, and request exemptions on technical grounds?</p>	<p>-</p>
<p>Question 8: Do you agree with our assessment of the impact of our proposals on the relevant equality groups? If not, then please explain why you do not agree.</p>	<p>-</p>