

Ofcom
Floor 4, Competition Group
Riverside House
2A Southwark Bridge Road
London SE1 9HA
Attention: Dr Yih-Chung Teh

17 October 2013

By email

Dear Yih Chung

I refer to your Consultation on Sky's Access Control Services Regulation.

Your consultation states that QVC is a user of Sky's AC services. However, QVC actually stopped using AC services on Sky in August 2013, after the launch date of your consultation. Our decision to stop was mainly due to the declining popularity of such services and the availability of other ways for our customers to interact with us.

Your consultation asks whether there are other interactive services which may require access to Sky's APIs in the foreseeable future and whether there may be a need for that access to be regulated. QVC is not itself currently planning any such services. Whether there is a need to regulate will depend on the development of those AC services and of the services that will compete with them. Sky currently deliver a range of extra on demand and "push" services through a broadband connection to the HD box. If Sky were to sell access to the Sky box via broadband in a similar way to existing AC services, and if that access were to reach some scale, then that could potentially require a regulatory assessment. However, it is hard to assess today how compelling broadband interactive services to a Sky box will be compared to second screen interactivity via a phone or tablet. As you point out, for many businesses, it is likely to be preferable, particularly on a global basis, to develop applications for mobiles and tablets rather than develop interactive services on a local platform-by-platform basis.

Subject to the caveat above, from our perspective we do not see a compelling need for continued regulation of AC services in their current form.

Yours sincerely


QVC

