



Standard abbreviations for television access services

Consultation

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Section 1

Summary

- 1.1 Ofcom published its Code on Electronic Programme Guides (EPGs) earlier this year. In response to points made in consultation, we explained that we would require EPG providers to use standard abbreviations to denote programmes accompanied by television access services (subtitling, signing and audio description) as part of a package of measures to make viewing easier for the intended audience. We shall also require broadcasters to provide accurate and timely information to EPG providers on which programmes have access services available. For a variety of reasons (summarised in section 2), we concluded earlier this year that symbols were not a practicable way forward for the time being.
- 1.2 We have discussed possible abbreviations with groups representing users of access services, as well as EPG providers and a number of broadcasters. In order to maximise the impact of standard abbreviations, we also hope that publishers of listings in magazines and newspapers will consider adopting the same abbreviations, and we have had preliminary discussions with providers of listings to these publications in order to understand relevant issues. While there is more support for some abbreviations than others, there is not an overwhelming consensus for one set of abbreviations over another. We are therefore seeking the views of all interested parties before reaching a conclusion.
- 1.3 Once we have considered all the views of consultees, Ofcom will publish guidance on the abbreviations which should be used in EPGs. EPG providers will be required under paragraph 11 of the Code on Electronic Programme Guides to ensure that information identifying programmes with access services uses the standard abbreviations. Broadcasters, who provide much of the information displayed in EPGs, are required by the Code on Television Access Services to co-operate with EPG providers in publicising awareness of access services, and will be required to use standard abbreviations in material provided for EPGs.
- 1.4 Ofcom would particularly welcome the views of people who use access services, and organisations representing their interests, as well as broadcasters, and providers of EPGs and listings information.
- 1.5 The text of the full document is available in screen-readable PDF format via the link on the home page for this consultation on the Ofcom website.

Section 2

Background

- 2.1 As a result of the Communications Act, and the Code on Television Access Services¹ made under the Act, broadcasters will be required to provide an increasing amount of television access services (subtitling, signing and audio description) in the years ahead. Ofcom is under a statutory obligation to set out in a code on EPGs the features that Ofcom considers appropriate for securing that people with hearing and / or visual impairments are informed about television access services (section 310(3)(b) of the Communications Act 2003).
- 2.2 We consulted on a draft EPG code earlier this year, and published our statement of conclusions on 26 July 2004². We noted the general support amongst representatives of users for common symbols or wording to identify programmes accompanied by particular access services, and concluded that a common approach should be introduced across EPGs on all platforms, whether satellite, cable or digital terrestrial.
- 2.3 In the light of practical considerations suggested by EPG providers, we accepted that the code should require that the necessary identification of programmes accompanied by access services be included in programme synopses, rather than the primary programme listings. In particular, Ofcom accepted that as programme titles were often cut short in the primary programme listings, it would not be reasonable to aggravate this problem by requiring access service identifiers to be included before the title, and that it would be pointless to require them at the end, as they would be lost in many cases, and so would serve little purpose to viewers.
- 2.4 We also concluded that abbreviations, rather than symbols, should be used. Firstly, use of abbreviations included in broadcast programme data would avoid problems of backwards compatibility, given that manufacturers of the installed base of set top boxes are likely to be reluctant to spend money on developing and implementing software upgrades to allow symbols to be shown. It would also avoid the long delay that might result from the need to devise, test and implement software changes. Secondly, there are existing abbreviations for some types of access services that already enjoy widespread recognition. Thirdly, the use of abbreviations would minimise the demand on bandwidth.
- 2.5 Ofcom considered that significant delays could occur if it waited for a consensus between EPG providers and disability groups to emerge about suitable abbreviations, and that it should initiate consultations before deciding what abbreviations would be appropriate. In the light of discussions with EPG providers about the financial impact of changes they would need to make, Ofcom advised them that any software changes that might be required (e.g. to replace non-standard abbreviations in the title bar of programme synopses) should be undertaken as part of the business-driven cycle of software upgrades, rather than as a stand-alone project.
- 2.6 However, we also told EPG providers that, if such software changes were likely to be delayed beyond the end of the year, we were minded to require that suitable abbreviations be included as part of the broadcast programme synopses, at the beginning of the text. The reason for suggesting that abbreviations be positioned at the

¹ Statement on Code on Television Access Services.

http://www.ofcom.org.uk/consultations/responses/tv_access_services/statement/?a=87101

² Statement on Code on Electronic Programme Guides.

<http://www.ofcom.org.uk/consultations/responses/epc/statement/?a=87101>

beginning of the text is that on some EPGs, the programme synopsis runs over to a second page (which Ofcom regards as insufficiently prominent) or is cut off altogether (particularly in the case of cheaper digital terrestrial set top boxes).

Current position

2.7 EPGs are provided by Sky for most satellite services received in the UK, Telewest and NTL on their cable systems, and by Teletext and TDN (The Digital Network, comprising representatives of the multiplex licensees) on the digital terrestrial platform. The ultimate source of information on whether programmes have access services is the broadcaster, though some EPGs and listings publications use listings collated by intermediaries, such as BDS Limited or the Press Association. The approach that EPGs take to describing programmes with television access services differs, and is summarised in Table 1 below.

Table 1: Terms used by EPG providers to denote television access services

EPG provider	Audio description	Subtitling	Signing
Sky (satellite)	N / AD ³	T	'Signed'
NTL (cable)	-	'Subtitling'	-
Telewest (cable)	-	-	-
TDN (DTT) ⁴	-	'Subtitling'	-
Teletext (DTT)	-	S ⁵	-

2.8 Many viewers use newspapers or listings magazines to plan their viewing. Not all such publications provide details of access services, but the approach of some that do is summarised in Table 2 below.

³ N is used in the title bar of programme synopses for Sky channels, and AD is used in the programme synopsis supplied by the BBC for BBC channels.

⁴ **TDN's members broadcast information about subtitling on the main terrestrial channels, but many DTT EPGs are not capable of displaying it.**


⁵ The Teletext EPG indicates whether programmes on the main terrestrial channels (e.g. BBC 1, ITV 1) are subtitled, but does not provide information about other access services or other channels.

Table 2: Terms used by selected publications to denote television access services

Magazine	Audio description	Subtitling	Signing
National newspapers ⁶	-	T ⁷	-
Evening Standard	-	S	-
What's On TV	-	Txt	'Signed'
Radio Times	AD	S	'Signed'
TV Choice	-	T	-
TV Times	-	T	'With signing'

2.9 Websites are an increasingly important source of information for television viewers, and some websites provide television listings in a format that blind or visually impaired people can read with screen readers. Not all websites provide details of access services, but the approach of some of those that do is summarised in Table 3 below.

Table 3: Terms used by selected websites to denote television access services

Website	Audio description	Subtitling	Signing
bbc.co.uk	'With audio description'	'Subtitles'	'Signed'
itv.com	-	S	SL
radiotimes.co.uk	'Audio described'	'Subtitled'	'Deaf-signed'
digiguide.com	'Audio described'	'Subtitled'	'Signed'
aol.co.uk	-	T/'Subtitled'	-
tvvtv.co.uk	-		-

⁶ Includes newspapers published in Northern Ireland, Scotland and Wales.

⁷ 'S' is widely used in national newspapers to denote programmes broadcast with stereo sound.

Section 3

Options

- 3.1 In this section, we discuss possible options for denoting television access services, and invite the views of consultees.

General considerations

- 3.2 In seeking appropriate abbreviations for access services, a number of considerations need to be borne in mind:
- a. brevity is important, not simply because of the space constraints in EPGs, but to increase the likelihood that non-regulated printed media (such as magazines and newspapers) will choose to make use of the same abbreviations. Ofcom believes that it would help to reduce confusion if these publications choose voluntarily to use the same abbreviations. Major providers of listings information to newspapers and magazines have indicated that publications are likely to be sympathetic to the use of standardised abbreviations, but that shorter abbreviations are more likely to be used. In this connection, lower case letters use less space than upper case letters;
 - b. abbreviations need not supplant full references to the access service concerned (e.g. 'Subtitling', 'With signing') where EPG providers would prefer to retain these; and
 - c. familiarity with current abbreviations will make it easier to secure widespread understanding of standard abbreviations, but this should be balanced against the likelihood that, once a standard approach is adopted, it will become familiar to the intended audience within a reasonable period.

Subtitling

- 3.3 On analogue terrestrial (and some cable) channels, subtitling is provided as a teletext service, and is accessed by pressing the 'Text' button and then '888'. For that reason, a number of listings magazines and most national newspapers use 'T' or 'Txt' to denote subtitling. In the past, several listings also used '888', although few do so now – Guardian Online is an exception. The advantage of using 'T' is that it is familiar to many people. The disadvantage of 'T' is that it is not obviously linked to subtitling, and that progressively fewer people are using teletext to access subtitles. Viewers of digital television services (most cable subscribers and all satellite and digital terrestrial viewers) use their EPGs, not teletext, to get subtitles. As an increasing proportion of UK viewers use satellite, DTT or digital cable services to access subtitling, the teletext route will be far less significant.
- 3.4 'S' is used by some listings providers (e.g. Radio Times and the Teletext EPG) to denote subtitling. The advantages of 'S' are that it uses just one character, and that it uses the initial letter of subtitling. The disadvantage of 'S' is that it is used in the television listings of national newspapers to denote stereo. However, as more and more programmes on terrestrial channels are broadcast in stereo, Ofcom has been told that listings publishers are likely to dispense with this abbreviation. Initial soundings taken by a major provider of listings information to newspapers indicate that all of those contacted would be willing to use 'S' to describe access services. Possible alternatives include 'Sub', 'SubT', or 'S/T'.

Question 1. Which abbreviation do consultees favour to indicate whether a programme is accompanied by subtitling, and why?

Signing

- 3.5 Most EPGs and listings magazines do not identify programmes presented in or accompanied by sign language, in part because they have been largely confined to regular slots on public service channels, and in part because the number of viewers who use signing is relatively small. However, as a result of the Code on Television Access Services, significantly more programmes will be signed, and they will be distributed across many more channels.
- 3.6 Those listings (electronic or print) that do denote signed programmes normally refer to 'Signing' or 'Signed' in the programme synopsis. While unambiguous, the disadvantage of this is that it uses 6 or 7 characters (more if brackets and spacers are included). One possible alternative would be 'BSL', which is already used on websites operated by groups providing services to users of British Sign Language (used in television programmes presented in, or accompanied by sign language). Another alternative would be 'SL', which uses one less character.

Question 2. Which abbreviation do consultees favour to indicate whether a programme is presented in or accompanied by signing, and why?

Audio description

- 3.7 Most EPGs, newspapers and listings magazines do not identify programmes with audio description. The Sky EPG identifies audio-described programmes on Sky channels with 'N' (representing 'Narrative'), and corresponding programmes on BBC channels with 'AD'. Audio-described programmes on other channels are generally not signified. The Radio Times also uses 'AD'.
- 3.8 The main advantage of 'N' is that those viewers who have accessed audio description via the Sky EPG will be familiar with the significance of 'N' and 'Narrative'. It also uses just one character. The disadvantage is that others may not appreciate the significance of these terms, as the service is more widely known as audio description – indeed, Sky's own accessibility webpage refers to audio description rather than narrative. The main advantage of AD is that it is intuitively easier to recognise as a reference to audio description. The main disadvantage is that it requires one more character.

Question 3. Which abbreviation do consultees favour to indicate whether a programme is accompanied by audio description, and why?

Positioning of abbreviations

- 3.9 Ofcom considers that EPG providers should continue to provide information on access services in programme synopses at least until such time as the EPG provides acceptable alternative and comprehensive means for users to identify programmes accompanied by access services.
- 3.10 As explained in paragraph 2.6 above, we also consider it important that this information should be displayed prominently – for example, at the beginning of programme synopses. However, if EPG providers are able to provide assurances that

access service abbreviations will appear on the first page of a programme synopsis (whether at the beginning or end of the programme notes), we consider that this would be sufficiently prominent to be clear to users.

Role of broadcasters

- 3.11 Broadcasters are the ultimate source of information on whether programmes are accompanied by access services. In order to meet the needs of their users, EPG providers need information that is timely and accurate. This has not always happened in the past. Broadcasters are now under an obligation to make available accurate and timely information to EPG providers⁸, and Ofcom expects them to use their best efforts to fulfil this.
- 3.12 Printed listings publications face longer deadlines than EPG providers. Ofcom understands that the intermediaries used by listing publications do not always receive accurate and timely information on the full range of access services provided with programmes, and that some listings publications are reluctant to carry this information for fear of misleading their readers. Ofcom encourages broadcasters to supply listings publications or their intermediaries with accurate information in time to meet their publication deadlines.

⁸ Paragraph 29, Code on Television Access Services, July 2004, Ofcom.

Section 4

Regulatory impact assessment

- 4.1 The analysis presented in this Section, when read in conjunction with the rest of this document, represents a Regulatory Impact Assessment (RIA), as defined by section 7 of the Communications Act 2003. You should send any comments on this RIA to us by the closing date for this consultation. We will consider all comments before deciding whether to implement our proposals.
- 4.2 RIAs provide a valuable way of assessing different options for regulation and showing why the preferred option was chosen. They form part of best practice policy-making and are commonly used by other regulators. This is reflected in section 7 of the Act, which means that generally we have to carry out RIAs where our proposals would be likely to have a significant effect on businesses or the general public, or when there is a major change in Ofcom's activities. In accordance with section 7 of the Act, in producing the RIA in this document Ofcom has had regard to such general guidance as it considers appropriate, including related Cabinet Office guidance.

Policy objectives

- 4.3 Having regard to Ofcom's obligation under section 310(3)(b) of the Communications Act 2003 to secure that EPGs include the features necessary to ensure that people with hearing and / or visual impairments are informed about assistance provided in relation to television programmes listed in the EPG, Ofcom's policy objective is to secure the use of standard abbreviations for access services in EPGs. In order to maximise the benefits of standardisation, Ofcom also wishes to encourage those providing listings in printed media to use the same abbreviations where possible.

Options

- 4.4 Ofcom considered whether:
- a. to leave it to EPG providers to secure consensus on appropriate abbreviations in discussion with representatives of users of access services (Option 1); or
 - b. to publish advice on appropriate abbreviations, but not to make it mandatory (Option 2); or
 - c. to require EPGs to use standard abbreviations (Option 3).

Costs

- 4.5 Options 1 and 3 would require changes by some EPG providers (depending on which abbreviations are selected). Only Option 2 would allow EPG providers to decide whether or not to incur costs. In the light of discussions with providers of listings information to EPG operators and the print media, Ofcom considers that the cost of including standard abbreviations in programme synopses would not be significant. Broadcasters already have to provide information to listings compilers about what programmes are accompanied by access services, and this would need to be included as part of the task of editing programme synopses they currently undertake. The need to include abbreviations would reduce the number of characters available for programme descriptions (normally between 180 and 200) in cable and satellite EPGs.

- 4.6 Where graphics are used to denote access services, and these are driven by software installed in set top boxes, there would be a cost in making changes to any graphics which were non-standard. Ofcom has already made clear that where software changes would be required (e.g. to list access services that have not been listed before, or to replace non-standard abbreviations in the title bar above programme synopses) should be undertaken as part of the business-driven cycle of software upgrades, rather than requiring a stand-alone project.
- 4.7 We asked EPG providers what costs they would face in changing abbreviations in parts of their EPG other than the programme synopses. While EPG providers did not provide detailed costings, some have indicated they would expect to make any necessary changes to abbreviations as part of other planned work. EPG providers pointed out that the use of graphic symbols would be far more costly than abbreviations; one EPG provider suggested that changes to abbreviations could be accomplished without substantial work, and that the one-off cost would be in the order of tens of thousands of pounds, rather than hundreds of thousands if symbols were used.

Benefits

- 4.8 The types of benefits that might be expected to flow from the use of standard abbreviations on EPGs include:
- a. more opportunities for people with hearing and / or visual impairments to understand and enjoy television programmes, as a consequence of broadcasters being required to provide information to EPG providers about programmes broadcast with access services;
 - b. larger audiences for those broadcasters making available programming with access services;
 - c. certainty for EPG providers about how they should label programmes with access services;
 - d. good prospects (provided suitably brief abbreviations are adopted) that other listings publications will adopt them, reinforcing the benefits described in (a) and (b) above; and
 - e. simplification of the tasks performed by companies providing listings information for EPG providers (and listings publications), as they would no longer have to tailor abbreviations to individual clients.
- 4.9 The nature of these benefits is that it would be difficult, and in some cases impossible, to quantify them. Given the relatively modest scale of costs envisaged, Ofcom considers that it would not be proportionate to attempt quantification. Nonetheless, Ofcom considers that it is likely that the value of the benefits is likely to exceed the costs. Even if the costs exceeded the benefits, Ofcom's view is that the costs are likely to be proportionate in relation to the requirement in section 310(2)(b) of the Communications Act 2003 to ensure that EPG providers do what Ofcom considers appropriate to inform people with hearing and/or visual impairments about assistance provided in relation to television programmes.

Risks

- 4.10 In the light of discussions with EPG providers, Ofcom is satisfied that if EPG providers were left to secure a consensus in consultation with representatives of users of access services (Option 1), it is likely that the process, at best, would be prolonged, and at worst, fail to achieve unanimity. Indeed, two of the EPG providers have indicated that they would prefer Ofcom to take the lead in the process of identifying standard abbreviations.
- 4.11 Option 2 provides no certainty that all EPG providers would choose to follow the advice. Those who followed the advice would incur the costs described above. To the extent that EPG providers chose not to use standard abbreviations, this would diminish the potential benefits to access service users, and reduce the likelihood of newspapers, listings magazines and websites using the abbreviations.
- 4.12 By contrast, Option 3 would provide certainty that the standard abbreviations would be used on EPGs, and would make it more likely that newspapers, listings magazines and websites would choose to use the same abbreviations. This certainty is likely to be welcomed by those who use access services, as well as by EPG providers facing decisions about which approach to take.

Conclusion

- 4.13 .In the light of the factors discussed above, we consider that Option 3 (requiring EPG providers to use standard abbreviations) represents the least intrusive way of securing Ofcom's policy objective that users are informed about the availability of access services with television programmes.

Question 4. *Ofcom has considered the advantages and disadvantages of three options. Are there better options that would fulfil the policy objective?*

Section 5

Responding to this consultation

How to respond

Ofcom invites written views and comments on the issues raised in this document, to be made by **5pm on 20 January 2005**.

Ofcom strongly prefers to receive responses as e-mail attachments, in Microsoft Word format, as this helps us to process the responses quickly and efficiently. We would also be grateful if you could assist us by completing a response cover sheet (see Annex 2), among other things to indicate whether or not there are confidentiality issues. The cover sheet can be downloaded from the 'Consultations' section of our website.

Please can you send your response to peter.bourton@ofcom.org.uk.

Responses may alternatively be posted or faxed to the address below, marked with the title of the consultation.

Peter Bourton
Content & Standards
5 Floor
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Riverside House
2A Southwark Bridge Road
London SE1 9HA

Fax: 020 981 3806

Note that we do not need a hard copy in addition to an electronic version. Also note that Ofcom will not routinely acknowledge receipt of responses.

It would be helpful if your response could include direct answers to the questions asked in this document, which are listed together at Annex 3. It would also help if you can explain why you hold your views, and how Ofcom's proposals would impact on you.

Further information

If you have any want to discuss the issues and questions raised in this consultation, or need advice on the appropriate form of response, please contact Peter Bourton on 020 7981 3494.

Confidentiality

Ofcom thinks it is important for everyone interested in an issue to see the views expressed by consultation respondents. We will therefore usually publish all responses on our website, www.ofcom.org.uk, ideally on receipt (when respondents confirm on their response cover sheet that this is acceptable).

All comments will be treated as non-confidential unless respondents specify that part or all of the response is confidential and should not be disclosed. Please place any confidential parts of a response in a separate annex, so that non-confidential parts may be published along with the respondent's identity.

Ofcom reserves its power to disclose certain confidential information where this is necessary to fulfil its functions, although in practice it would do so only in limited circumstances.

Please also note that copyright and all other intellectual property in responses will be assumed to be assigned to Ofcom unless specifically retained.

Next steps

Following the end of the consultation period, Ofcom intends to publish a statement early in 2005 setting out guidance for EPG providers.

Please note that you can register to get automatic notifications of when Ofcom documents are published, at http://www.ofcom.org.uk/static/subscribe/select_list.htm.

Ofcom's consultation processes

Ofcom is keen to make responding to consultations easy, and has published some consultation principles (see Annex 1) which it seeks to follow, including on the length of consultations.

This consultation period will run for ten weeks, notwithstanding the holiday period, because it follows on from consultation on the Code on Electronic Programme Guides, and affects particular groups and bodies only, namely television viewers with hearing and / or visual impairments, as well as broadcasters and EPG providers.

If you have any comments or suggestions on how Ofcom conducts its consultations, please call our consultation helpdesk on 020 7981 3003 or e-mail us at peter.bourton@ofcom.org.uk. We would particularly welcome thoughts on how Ofcom could more effectively seek the views of those groups or individuals, such as small businesses or particular types of residential consumers, whose views are less likely to be obtained in a formal consultation.

If you would like to discuss these issues, or Ofcom's consultation processes more generally, you can alternatively contact Philip Rutnam, Partner, Competition and Strategic Resources, who is Ofcom's consultation champion:

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London SE1 9HA
Tel: 020 7981 3585
Fax: 020 7981 3333

E-mail: philip.rutnam@ofcom.org.uk

Annex 1

Ofcom's consultation principles

Ofcom has published the following seven principles that it will follow for each public written consultation:

Before the consultation

A1.1 Where possible, we will hold informal talks with people and organisations before announcing a big consultation to find out whether we are thinking in the right direction. If we do not have enough time to do this, we will hold an open meeting to explain our proposals shortly after announcing the consultation.

During the consultation

A1.2 We will be clear about who we are consulting, why, on what questions and for how long.

A1.3 We will make the consultation document as short and simple as possible with a summary of no more than two pages. We will try to make it as easy as possible to give us a written response. If the consultation is complicated, we may provide a shortened version for smaller organisations or individuals who would otherwise not be able to spare the time to share their views.

A1.4 We will normally allow ten weeks for responses to consultations on issues of general interest.

A1.5 There will be a person within Ofcom who will be in charge of making sure we follow our own guidelines and reach out to the largest number of people and organisations interested in the outcome of our decisions. This individual (who we call the consultation champion) will also be the main person to contact with views on the way we run our consultations.

A1.6 If we are not able to follow one of these principles, we will explain why. This may be because a particular issue is urgent. If we need to reduce the amount of time we have set aside for a consultation, we will let those concerned know beforehand that this is a 'red flag consultation' which needs their urgent attention.

After the consultation

A1.7 We will look at each response carefully and with an open mind. We will give reasons for our decisions and will give an account of how the views of those concerned helped shape those decisions.

Annex 2

Consultation response cover sheet

- A2.1 In the interests of transparency, we will publish all consultation responses in full on our website, www.ofcom.org.uk, unless a respondent specifies that all or part of their response is confidential. We will also refer to the contents of a response when explaining our decision, without disclosing the specific information that you wish to remain confidential.
- A2.2 We have produced a cover sheet for responses (see below) and would be very grateful if you could send one with your response. This will speed up our processing of responses, and help to maintain confidentiality by allowing you to state very clearly what you don't want to be published. We will keep your completed cover sheets confidential.
- A2.3 The quality of consultation can be enhanced by publishing responses before the consultation period closes. In particular, this can help those individuals and organisations with limited resources or familiarity with the issues to respond in a more informed way. Therefore Ofcom would encourage respondents to complete their cover sheet in a way that allows Ofcom to publish their responses upon receipt, rather than waiting until the consultation period has ended.
- A2.4 We strongly prefer to receive responses in the form of a Microsoft Word attachment to an email. Our website therefore includes an electronic copy of this cover sheet, which you can download from the 'Consultations' section of our website.
- A2.5 Please put any confidential parts of your response in a separate annex to your response, so that they are clearly identified. This can include information such as your personal background and experience. If you want your name, address, other contact details, or job title to remain confidential, please provide them in your cover sheet only so that we don't have to edit your response.

Cover sheet for response to an Ofcom consultation

BASIC DETAILS

Consultation title: Standard abbreviations for television access services

To (Ofcom contact):

Name of respondent:

Representing (self or organisation/s):

Address (if not received by email):

CONFIDENTIALITY

What do you want Ofcom to keep confidential?

Nothing	<input type="checkbox"/>	Name/contact details/job title	<input type="checkbox"/>
Whole response	<input type="checkbox"/>	Organisation	<input type="checkbox"/>
Part of the response	<input type="checkbox"/>	If there is no separate annex, which parts?	

If you want part of your response, your name or your organisation to be confidential, can Ofcom still publish a reference to the contents of your response (including, for any confidential parts, a general summary that does not disclose the specific information or enable you to be identified)?

DECLARATION

I confirm that the correspondence supplied with this cover sheet is a formal consultation response. It can be published in full on Ofcom's website, unless otherwise specified on this cover sheet, and I authorise Ofcom to make use of the information in this response to meet its legal requirements. If I have sent my response by email, Ofcom can disregard any standard e-mail text about not disclosing email contents and attachments.

Ofcom seeks to publish responses on receipt. If your response is non-confidential (in whole or in part), and you would prefer us to publish your response only once the consultation has ended, please tick here.

Name

Signed (if hard copy)

Annex 3

Consultation questions

Question 1. Which abbreviation do consultees favour to indicate whether a programme is accompanied by subtitling, and why?

Question 2. Which abbreviation do consultees favour to indicate whether a programme is presented in or accompanied by signing, and why?

Question 3. Which abbreviation do consultees favour to indicate whether a programme is accompanied by audio description, and why?

Question 4. Ofcom has considered the advantages and disadvantages of three options. Are there better options that would fulfil the policy objective?