



## 1. Introduction

S4C is a broadcaster whose public service remit is to provide a broad range of high quality and diverse programming in a service in which a substantial proportion of programmes consists of programmes in Welsh.

Under S4C's guidelines for producers, S4C's policy is not to charge viewers for the cost of phone calls or text messages for participating in competitions or other programme-related interaction, over and above the network service providers' fee. Any exception to this would require specific approval from S4C.

S4C does not propose to respond to each question raised by Ofcom, but we wish to offer comments on two questions with specific implications for S4C.

## 2. Specific Responses

*Question 6.4 (p.62): Do you consider PCAs would improve price transparency in the PRS market?*

S4C is concerned generally about the complexity and cost of introducing pre-call announcements (PCAs) for PRS numbers. There is a further complexity for S4C, as facilities would need to be provided to enable callers to hear PCAs either in Welsh and English or in their language of choice.

Although a substantial proportion of S4C's programmes are in Welsh, S4C provides facilities for its services also to be enjoyed by non-Welsh speakers. English language subtitling is available in c.86% of its programmes. In addition, S4C offers the facility for viewers to select an English language audio track for some of its programmes, especially sports programmes. As a result, S4C's services are also viewed by non-Welsh speakers.

Should Ofcom proceed to make it mandatory to have pre-call announcements (PCAs) for PRS numbers, there would be technical and cost implications for S4C in providing bilingual PCAs. To provide bilingual PCAs, it would be necessary either to pre-record bilingual messages or to allow callers to select their language of choice. In either case, this could take longer than for calls in the English language only, which, depending on the basis on which calls are charged, may result in higher call charges. There would also be higher costs involved in providing a facility for callers to select their language of choice.

We would request that Ofcom take this issue into account when considering whether to make PCAs mandatory for PRS numbers.

*Question 6.6 (p.63): Do you consider including BT's tariff and a maximum tariff for the PRS in PRS advertisements would improve price transparency in the PRS market?*

We would question how feasible it is to obtain up-to-date and accurate information about the highest tariff which applies at any particular time. This is likely to increase the cost and complexity of conducting activities involving PRS in connection with broadcast programmes.