

Consultation response form

<p>Question 1(a): Do you agree that EPG providers should use reasonable endeavours to secure so far as practicable that their EPGs include options for users to use all or as many as possible of the following accessibility features: (a) ‘text-to-speech’, (b) ‘filtering or highlighting’, (c) ‘magnification’ and (d) ‘high contrast’ displays (i.e. with a contrast ratio of no less than 7:1)? If not, please explain why you do not agree giving reasons.</p>	<p>As Ofcom will recall, as part of our response to the previous consultation, we stated that our preferred wording was ‘reasonable endeavours...so far as practicable’, so we are supportive of Ofcom’s current position.</p> <p><i>Text-to-speech</i> However, in relation to mandating text-to-speech functionality as part of the EPG Code, Ofcom is not allowing innovation or market changes to encourage future technical developments in this area. By focussing on one solution, Ofcom is restricting platform providers in a dynamic market place where technology and consumer needs are accelerating. We urge Ofcom to amend the current proposed wording, so the EPG Code doesn’t exclude other technical solutions that may better suit both platform providers and visually-impaired users.</p> <p><i>Filtering or highlighting / Magnification / High contrast displays</i> We do not have any further comments about these proposed changes.</p>
<p>Question 1(b): Do you agree with the changes to the EPG Code that we propose to make to implement these proposals? If not, please explain why you do not agree giving reasons.</p>	<p>As mentioned above, we do not believe that the EPG Code should mandate specific solutions; rather, it should focus on the overall objective to improve access to EPGs. It may be useful to illustrate some potential solutions by presenting them as examples, but the Code should be flexible enough to cope with future technical developments and consumer needs.</p>
<p>Question 2: Do you agree that the proposed features should be rolled out on all new models of TV receivers commencing development from when the changes to the EPG Code that we are proposing enter into force, and any subsequent models (using reasonable endeavours, so far as practicable)? If not, please explain why you do not agree giving reasons.</p>	<p>We do not have any further comments to make regarding this question.</p>
<p>Question 3: Do you agree with our revised</p>	<p>We agree with retaining paragraph 10 of the</p>

<p>proposal to retain and amend paragraph 10 of the current EPG Code, which requires EPG licensees to produce an annual statement regarding accessibility? If not, please explain why you do not agree giving reasons.</p>	<p>current EPG Code.</p>
<p>Question 4: Do you agree that with the changes that we propose to make to paragraphs 7, 11 and 13 of the current EPG Code to simplify the Code? If not, please explain why you do not agree giving reasons.</p>	<p>We do not have any further comments to make regarding these proposed changes.</p>
<p>Question 5: Do you agree with our assessment of the impact of our proposals, in terms of the benefits and costs associated with these proposals for consumers, EPG providers, and set top box manufacturers? Please explain the reason for your answer, providing supporting evidence on costs and/or benefits where available.</p>	<p>We do not have any additional comments to make regarding this question.</p>
<p>Question 6: Do you agree with our assessment of the impact of our proposals on the relevant equality groups? If not, please explain why you do not agree.</p>	<p>We do not have any additional comments to make regarding this question.</p>
<p>Question 7: Do you have any other comments on our analysis or proposals?</p>	<p>We do not have any additional comments to make regarding this question.</p>