



**PROVISION OF ELECTRONIC PROGRAMME GUIDES (“EPGS”) UNDER TELEVISION LICENSABLE
CONTENT SERVICE LICENCE NUMBER: TLCS000243BA**

STEPS TAKEN BY SKY UK LIMITED IN RELATION TO EPG ACCESSIBILITY

SECTION 1 – INTRODUCTION

- 1.1 This is Sky’s response to Ofcom’s request to provide an annual statement about the steps we have taken, and plan to take, to facilitate the use of our EPG by disabled people.
- 1.2 Paragraph 10 of Ofcom’s Code of Practice on Electronic Programme Guides (the ‘Code’) states that *“EPG providers are required to produce an annual statement, by 30 November each year, of the steps they have taken and plan to take to facilitate the use of their EPGs by disabled people”*.
- 1.3 The Code states that Ofcom will assess the adequacy of these statements in the light of the particular circumstances of each EPG and that EPG providers are expected to consult with disability groups about the way they meet the obligations under the Code.
- 1.4 This statement sets out the steps taken by Sky to ensure accessibility of its EPG.
- 1.5 The Code also calls for EPG providers to use reasonable endeavours to secure so far as practicable the following features (or their equivalents) on EPGs accessed on new models of TV receiver beginning development after 27 July 2018 and subsequent models (“New TV Receivers”):
 - (a) text-to-speech (TTS);
 - (b) the ability to filter/highlight audio description and signing;
 - (c) text magnification;
 - (d) high contrast displays (together, the “Specified Features”).
- 1.6 Sky has one model of set top box (“STB”), our 1TB UHD model of Sky Q STB, that qualifies amongst “New TV Receivers”. This model sits alongside the previous model of Sky Q STB and our Sky+ STB, both of which pre-date the above requirements.
- 1.7 At launch the Sky 1TB UHD STB had the same level of accessibility as our existing Sky Q STB. Therefore, highlighting and high contrast are available on the Sky+ HD STB, the existing models of Sky Q STB, and the Sky Q 1TB UHD STB. Whilst these STB models are not capable of running magnification, Sky+ offers the option for larger or bolder font. Research is on-going with regard to text magnification across our STB models.
- 1.8 As our reports from previous years have shown, Sky takes its responsibilities in this area seriously and has already taken many steps to create EPG environments that are accessible. We have done much innovating and investing to deliver accessibility functionality to customers. Consequently, our EPG areas already contain much of what Ofcom expects to see in terms of accessible features.
- 1.9 In our 2019 report we stated that our priority for the coming year was to implement TTS which at that time we anticipated being available by the end of 2020. As predicted the implementation of TTS has been both technically challenging and costly, and obviously for other reasons 2020 has been an unusual year with unique challenges and pressures being faced by everyone including

broadcasters. We are very pleased to report that, whilst launching TTS by the end of 2020 has turned out to be slightly ambitious, that we have made excellent progress (more on this below) and are on track for rolling TTS out to customers on all Sky Q STB models in Spring 2021.

- 1.10 We are committed to making our technology and services such that people with accessibility needs can avail themselves of our products in the same way as customers with no additional needs. Whilst we will not continue to list them in full in this year's report, we would point Ofcom to Sky's previous responses that detail many other features, products and apps that can be of assistance to those with accessibility needs. Elements such as User-Interface ('UI')/EPG navigation features can make using our EPG more user-friendly for all and we have accessible remotes available free of charge. Our Sky Q remote has voice capability which has many functions creating ease of use, such as being able to change channels and activating accessible services. The functionality is continually being improved allowing all users to conduct increasingly complicated and rich searches through their voice commands. Alongside this to support our technology we have been building and improving our current offering where possible. For example, creating a new accessibility section on sky.com which contains lots more support content for our access customers. Over the past year we have also trained over one hundred staff members on assistive technology to give our customer advisors more insight into how our blind and physically impaired customers use our products and services.

SECTION 2: SUMMARY OF AVAILABILITY OF FEATURES

2.1 Text-to-Speech (TTS)

- This feature has been accepted by Ofcom as one that is technically complex and expensive to implement.
- At Sky we believe that TTS is the most valuable feature to customers who have accessibility needs. We have therefore been prioritising work towards this element.
- Sky has completed development of our TTS solution and it is in the final stages of testing. It will then go into closed user trials before the end of the year. TTS will be launched to customers in Spring 2021.
- The TTS solution will be available on all models of Sky Q STB.
- Whilst full coverage across the entire UI is not possible at this stage, nonetheless we have strived to make TTS available on as much of the UI as possible. We are proud to say that the functionality is not limited to just the linear EPG elements (as required by the Code) and does stretch to many other parts of the UI such as our On Demand pages/content. Other helpful and often used features will also be covered, for example when downloading begins and a programme is ready to view this will be voiced, as will the 'Accessibility' settings section, and PIN requests and attempts. For ease of use customers will also be able to turn this TTS (or 'Voice Guidance') functionality on or off via their Voice Remote commands.
- It should also be noted that once the functionality is rolled out to customers, we do not view this as the end of this process. Over time we aim to improve and extend this functionality to continue to better serve those with accessibility needs.

2.2 Filtering/Highlighting Audio Description and Signing

- Across all our STBs we have the facility to highlight programmes with Subtitles or Audio Description on the main TV guide listing.
- Across all our STBs we have the facility to enable a 'beep' to be heard if Audio Description is present when scrolling through from one channel to another in programme viewing.

- Across all our STBs we the display AD, S (Audio Description and Subtitling) signs when a programme is selected on the TV Guide or when the 'i' button is pressed on the remote control.
- Currently highlighting programmes with Sign Language is not possible in the same way that it is for Subtitles and Audio Description. This is due to the flagging of Sign Language being done by individual broadcasters within the synopsis field. We are undertaking work intended to make this a customer experience that is consistent with the flagging of Subtitles and Audio Description. This would see a 'SL' icon being used alongside the ones already used for Subtitles (S) and Audio Description (AD). This would then provide the relevant metadata to allow proper highlighting of Sign Language programming.
- The delivery of this functionality has been delayed by some technical issues that have arisen over the course of the year; however, the solution has been agreed and signed-off and is due to go into development just before the end of the year. Our expectation based on the new timeline is that this functionality should be ready for release by Autumn 2021. The solution, like TTS, will work across all Sky Q STB models.

2.3 Text Magnification

- The Sky+ HD STB has an 'Increase Homepage Font Size' setting in the Accessibility menu. This complements the High Contrast and Bolder Font setting that we introduced previously and ensures that the font on the rich Homepage we offer can be adapted further.
- Both the older models of Sky Q STB and the newer Sky Q 1TB UHD STBs offer a high-end user interface rich in imagery, displaying TV content artwork or images. This helps customers navigate and find their content on screen.
- Despite difficulty and cost it was decided that TTS would bring the most benefit to users and should be prioritised, as we have done. However, this has naturally meant that we as yet do not have a firm timetable for the introduction of text magnification on Sky Q 1TB UHD. The image-led user interface and focus-based navigation of the Sky Q and Sky Q 1TB UHD STB makes text magnification a complex and expensive proposition to deliver successfully. We are keen to ensure that compliance with this feature does not become a "box-ticking exercise", but rather, sees us deliver an approach to magnification that is truly useful and user-friendly. Work to date has raised questions around the feasibility and benefits of magnification that we intend to more fully explore to ensure that any developments to the box constitute genuine improvements for users with visual impairments. Once TTS has been successfully launched we will continue to research the next improvements that can be made.

2.4 High Contrast Displays

- Across all of our STBs we have the ability to enable a High Contrast setting (which we developed based on insight from the RNIB).