



BRITISH TELECOMMUNICATIONS PLC (“BT”) RESPONSE TO “WHAT’S ON THE TELLY?” – PROPOSED IMPROVEMENTS TO EPG ACCESSIBILITY FOR PEOPLE WITH VISUAL IMPAIRMENTS

Introduction

As a shareholder, affiliate ISP and content provider in relation to the YouView platform and a linear and associated video on demand content provider (including BT Sport 1, 2, Europe and BT Sport/ESPN), we welcome the opportunity to respond to this Consultation.

Before launch and post-, the YouView set-top box (“STB”) has included many features specifically designed for viewers who are hard of hearing/deaf and partially sighted/blind. Indeed, some of these features are mentioned favourably by Ofcom in this Consultation. BT, as well as YouView, has good relationships with organisations such as AoHL and the RNIB and we hold regular meetings with these organisations to ensure we understand their issues and can implement change where we can.

Before answering the specific questions posed in the consultation, we would like to make a couple of general observations about it. As mentioned in the Speaking TV Guides Call for Input (“CFI”) last year, Ofcom should take a holistic view of such accessibility features. We still maintain that providing the functionality Ofcom is pushing for would take longer to achieve, would be more costly and ignores the other solutions which are quicker to get to market and easier to develop. Specifically, the disadvantage of built-in TTS is that this solution doesn’t tackle the requirements of other disability groups, can be disruptive of the user experience of other viewers in the room, is less flexible and is more expensive for the manufacturer since the functionality will need to be built into all set-top boxes (or TVs) whether they are used or not.

Secondly, and linked to the above point, is Ofcom’s perceived ‘less prescriptive’ approach regarding its proposed EPG wording of ‘best endeavours’. This proposed wording is not commercially viable or practical and could stifle innovation. For example, the inclusion of this wording could mean that the shareholders in YouView would have to reassess the development priorities at the detriment of innovative functionality. Further, despite Ofcom articulating that EPG providers could use “commercial leverage” with manufacturers of TV receivers to secure the proposed functionality, in practice the proposed ‘best endeavours’ wording would remove any such leverage as the EPG provider would be prohibited from genuine commercial discussions with such wording in place. In such a scenario an EPG provider would be forced to agree to terms in order to meet the ‘best endeavours’ requirement in the EPG Code. It is our view that ‘reasonable endeavours’ would allow EPG providers to enter into genuine and reasonable negotiations with manufacturers.

We will now go on to answer each of the questions in the Consultation. Please note that the sections highlighted in blue are confidential. As such we request that these sections are not published as part of Ofcom's summary of responses to this Consultation.

Q1. Do you agree with the range of potential benefits of TTS for TV viewers with visual impairments described in paragraph 3.5? Do you have any information that would help to quantify the potential benefits?

BT agrees that the range of potential benefits of TTS for TV viewers with visual impairments would help such viewers to use EPGs.

Q2. Do you have any information that would help to quantify the additional costs that EPG providers and TV receiver manufacturers would face in providing TTS capability in multi-functional TV receivers?

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However, as detailed in our response to last year's CFI, the type of costs would include:

- new chip sets;
- new HW/SW integration costs;
- new client SW development;
- new UI design and development;
- increased testing costs; and
- increased call handling costs from having an additional feature.

Q3. Do you agree that the EPG Code should be amended as proposed in Annex 5 to require that EPG providers use their best endeavours to secure that TTS-enabled EPGs are incorporated in multi-functional TV receivers?

No, we do not agree with this proposed wording. As mentioned in our introduction, this would not be commercially viable and is disproportionate. As part of YouView, BT has been instrumental in ensuring that enhancements benefit a range of groups with accessibility needs. Incorporating this functionality, as mentioned in our CFI, is not currently easy or cost-efficient. Consequently, Ofcom should allow the market to influence and encourage development in this area rather than imposing disproportionate regulation which would restrict innovation for the accessibility audience as well as the whole user base. We recommend that Ofcom amends the current proposed wording to 'reasonable endeavours'.

Q4. Do you have any information that would help to quantify the additional costs that EPG providers and TV receiver manufacturers would face in providing the ability to highlight or list separately programmes with audio description and signing in multi-functional TV receivers?

Alongside YouView, we are currently investigating the steps necessary to introduce this feature but we do not have any specific information regarding costs at this stage.

Q5. Do you agree that the EPG Code should be amended as proposed in Annex 5 to require that EPG providers use their best endeavours to secure that EPGs in multi-

functional TV receivers enable users to highlight or list separately programmes with (a) audio description and (b) signing?

For the same reasons detailed in the introduction and in response to Q3, we do not believe this proposed wording is appropriate. 'Reasonable endeavours' is more appropriate.

Q6. Do you have any information that would help to quantify the additional costs that EPG providers and TV receiver manufacturers would face in providing the ability to enlarge text or magnify portions of the EPG in multi-functional TV receivers?

The YouView platform includes an interactive zoom feature; however, we do not have any information regarding the costs of implementation.

Q7. Do you agree that the EPG Code should be amended as proposed in Annex 5 to require that EPG providers use their best endeavours to secure that EPGs in multi-functional TV receivers enable users to adjust the display of EPG information so that it can be magnified or the text enlarged?

Please see our response to Q5.

Q8. Do you have any information that would help to quantify the additional costs that EPG providers and TV receiver manufacturers would face in offering the ability to select a high contrast display of the EPG in multi-functional TV receivers?

The YouView platform includes the ability to select a high contrast display; however, we do not have any information regarding the costs of implementation.

Q9. Do you agree that the EPG Code should be amended as proposed in Annex 5 to specify that EPG providers use their best endeavours to secure that EPGs in multi-functional TV receivers enable users to have the option of switching to high contrast displays? Do you agree that a minimum contrast ratio of 7:1 would be appropriate for high contrast displays?

Please see our response to Q5. Regarding YouView's contrast ratio: when the Guide is 'unselected' the contrast ratio is 21:1. When an item on the Guide is selected, the ratio becomes 16:1, still higher than the recommended minimum.

Q10. Do you agree that, for the time being, the EPG Code should be amended as proposed in Annex 5 to require that EPG providers use their best endeavours to secure that the additional accessibility features (i.e., text-to-speech, filtering or highlighting, magnification and high contrast displays) are incorporated in EPGs for multi-functional TV receivers?

Please see our response to Q5.

Q11. Do you agree that EPG providers should be required to use their best endeavours to secure that specified accessibility features are incorporated in multi-functional TV receivers?

Please see our response to Q5.

Q12. Do you agree that, absent regulation, the proposed accessibility features might not be included in all new multi-functional TV receivers whose core specifications are determined by the EPG provider or otherwise agreed between the EPG provider and the manufacturer?

As mentioned in our response to Q3, Ofcom should allow market dynamics to influence and encourage development in this area rather than mandating the requirement as part of a revised EPG Code.

Q13. Do you agree that the EPG Code should be amended as shown in Annex 5?

BT agrees with most of the suggested changes in Annex 5. However, BT does not agree with the suggested change in para 6B with respect to the 'best endeavours' wording for the reasons detailed above.