

# Standard abbreviations for television access services

**Statement**

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## Section 1

# Summary

## Background

1.1 Ofcom published its Code on Electronic Programme Guides (EPGs) last year. In response to points made in consultation, we said 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.

## Decision

1.2 After discussing possible abbreviations with groups representing users of access services, as well as EPG providers and a number of broadcasters, Ofcom published a consultation paper on 11 November 2004. In the light of responses from disability groups, broadcasters, the Press Association and others, we have concluded that the balance of advantage lies in selecting the following upper case acronyms, for the reasons set out in section 2:

Subtitling – S

Signing – SL

Audio description – AD

1.3 The Code on Electronic Programme Guides has been amended to make clear that these abbreviations should be used in the programme synopsis box (where applicable) of electronic programme guides by 1 May 2005, and in other areas of EPGs requiring software changes, as soon as it is practicable to do so as part of other business-driven changes. The abbreviations should be displayed in upper case letters, but it remains acceptable to use the terms ‘subtitling’, ‘signing’ or ‘audio description’ in full as an alternative or addition. The abbreviations should appear at the beginning or end of the first page containing programme details. Corresponding changes have been made to the Code on Television Access Services to require broadcasters to supply EPGs with accurate and timely information on programmes carrying television access services, including the use of the standard abbreviations where the broadcaster supplies the programme synopsis. The changes to these Codes are set out in the Annex.

1.4 Ofcom will encourage publishers of online and printed television listings to use the same abbreviations where possible, and believes that many publishers will conclude that it would be in the interest of their readers to do so. However, Ofcom does not have the power to compel publishers to use them.

1.5 A copy of this document in a format suitable for use by screen readers has been posted on Ofcom’s website. Ofcom can also provide documents to individuals in alternative formats (e.g. Braille, audiotape or large print) on request. We may also provide translations of documents into languages other than English. To

request non-standard versions of documents, please contact the Ofcom Contact Centre at [contact@ofcom.org.uk](mailto:contact@ofcom.org.uk), by phone at 0845 456 or 020 7981 3554, or by textphone at 0845 456 3003. Please note that the time needed to produce an alternative format document will depend on the length of the document.

## Section 2

# Response to consultation comments

- 2.1 In our consultation document, we asked for responses to the questions set out below. Respondents included disability organisations ( the RNID, RNIB, Hearing Concern and TAG - formerly the Telecommunications Action Group), broadcasters ( the BBC, Channel 4, five, ntl, Sky, and Teletext) and others, including ITFC (an access services provider), the Press Association (which supplies listings to many printed publications), and yourlocalcinema.com (YLC), an internet site providing information about film showings with access services. Copies of the submissions have been placed on Ofcom's website.

## Subtitling

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

- 2.2 Respondents commented on five possible abbreviations – T, Sub, SubT, ST and S. Sky, while asserting that Ofcom had failed to demonstrate that mandating standard abbreviations was proportionate and warranted (see 'Other issues' below), said that if they were to be adopted, the use of T for subtitling would be consistent with the need for brevity, was familiar to many people, and was already used by many listings magazines as well as by the DTT EPG. NTL also favoured the use of T for similar reasons, as did Channel 4 (though it would support the use of S if Ofcom decided to endorse an approach that was not based on single letters).
- 2.3 Groups representing deaf or hearing impaired people took a different view. The RNID said that T was its 'least favoured' option, while TAG said that it was 'opposed' to the use of T, on the grounds that it was not intuitive, and that its use referred to teletext, which was the initial means of providing subtitling, but which would become increasingly anachronistic as users moved to digital services; ITFC agreed. TAG also pointed out that T was used to denote the presence of equipment that is hearing aid-compatible, which could give rise to confusion.
- 2.4 Most respondents (the BBC, Channel 4, five, Hearing Concern, ITFC, ITV, the Press Association and Teletext) advocated the use of S, either as a first or second preference. The grounds advanced for this included the view that S is more suggestive of subtitling than T (BBC, Press Association), familiarity (Teletext), support for the use of S amongst deaf staff (ITV), and the absence of adverse comment on its use on the ITV listings website (ITV). TAG suggested that S could be interpreted to refer to stereo. However, the Press Association noted that few publications bothered to list programmes in stereo, and several respondents noted the apparent readiness of publishers to dispense with the use of S for this purpose now that stereo programming is the rule, rather than the exception (BBC, ITFC, Press Association).
- 2.5 Some respondents suggested that either ST or SubT would be more suitable abbreviations, including TAG and YLC, the latter on the grounds that it was

already used by some 360 cinemas around the country. The RNID initially took the same line, but subsequently indicated that, following discussions with broadcasters, it favoured a single-letter abbreviation, as more printed listings publications would be likely to use it.

## Ofcom's response

- 2.6 There is general agreement that subtitling users would find it helpful if listings publishers voluntarily made use of the same abbreviations as Ofcom will mandate for EPGs. Ofcom is persuaded by the Press Association's arguments (supported by Channel 4) that this would be more likely if the standard abbreviations were concise<sup>1</sup>. For that reason, Ofcom does not think that it would be in the overall interests of subtitling users to use a two, three or four letter acronym, such as ST, Sub or SubT.
- 2.7 While T is more widely used than S at present because of its historical association with teletext as a means of accessing subtitling, this will become progressively less relevant as more and more people access subtitling digitally. We believe that it would be better if the standard abbreviation was more intuitive, and technologically neutral. We also consider that those who are used to T will quickly become used to S. Accordingly, Ofcom considers that the balance of advantage lies in using S as the abbreviation for subtitling.

## Signing

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

- 2.8 Respondents commented on three possible abbreviations – BSL, SL, and S. The first choice of most was SL (TAG, Hearing Concern, ITFC, Teletext, NTL, BBC, five and Press Association). Reasons given were its relative brevity in comparison to BSL (ITFC, Press Association, Teletext), that it could be used to indicate other forms of signing such as Irish Sign Language or Sign Supported English (TAG), that it was intuitive or readily understandable (BBC, NTL, Teletext), and that Irish publications would find it preferable to references to British Sign Language (Press Association).
- 2.9 Channel 4 said that if Ofcom endorsed abbreviations with more than one letter, it would support the use of SL as against its first preference of S. Sky also favoured the use of S, on the grounds that this would be easier to fit into the title bar of the programme synopsis. ITV favoured the use of BSL, on the grounds that this acronym would reinforce the position of British Sign Language as an indigenous language. RNID also preferred BSL, but was said that SL was acceptable if brevity was an issue.

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<sup>1</sup> As one example, the BBC indicated that its proposed approach to standard abbreviations would be supported by [bbc.co.uk](http://bbc.co.uk) and the Radio Times.

## Ofcom's response

- 2.10 Ofcom considers that SL would be the most appropriate abbreviation, balancing ease of recognition against brevity. In the light of the Press Association's comments, we consider that those publishers of television listings willing to include abbreviations would accept a two letter acronym for signing, as far fewer programmes are signed than subtitled, so the demands on space will be significantly less. As regards the point made by Sky, Ofcom has indicated that, given the space limitations, it does not require the abbreviations to be placed in the title bar of the programme synopsis. Whilst recognising the force of ITV's arguments, we note that disability organisations responding to the consultation would find SL acceptable.

## Audio description

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

- 2.11 Respondents commented on three possible acronyms – N, D and AD. Almost all respondents favoured the use of AD (BBC, five, Hearing Concern, ITFC, ITV, Press Association, Teletext, YLC) on the grounds that it was widely understood (BBC, ITFC, RNIB, TAG), or more intuitive than N (ITV, NTL, Press Association, RNIB). As with signing, Channel 4 said that it would support the use of AD if Ofcom endorsed acronyms of more than one letter.
- 2.12 Sky noted that most households able to benefit from audio description subscribed to Sky, whose EPG used N, a term that was well established and widely understood to mean Narrative (the term used by Sky to describe audio description). It said that it had not received any indications of problems concerning the current use of N and argued that new users would quickly adapt to the term. Channel 4 said that, in the absence of standard abbreviations now, there was an opportunity for a fresh start. It favoured single letter abbreviations – either N, for similar reasons to those of Sky, or D, if disability groups felt more comfortable with this. However, RNIB strongly advised against the use of N on the ground that it would confuse viewers; it said that blind and partially sighted people referred to the service as audio description, and that AD was therefore the most intuitive abbreviation. Teletext said that N could be taken by some to represent Nicam Stereo.

## Ofcom's response

- 2.13 Ofcom notes the consensus in support of using AD, and agrees that it would be a more intuitive reference to audio description than the alternatives suggested. While N has been used for some time to denote programmes on Sky-branded channels, audio description on the most popular channels was not introduced on the satellite platform until a few months ago. The programme synopses in Sky EPG listings for these channels use AD to denote audio description (in the case of the BBC channels) or no designation at all. Moreover, many potential users receive digital terrestrial and cable television, where audio described

programmes are not currently reported. Accordingly, we consider that the balance of advantage lies in using AD, as it is a more intuitive term.

## Alternative options

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

- 2.14 Most of those who responded were content with the recommended option or did not advocate alternative options (BBC, Channel 4, five, Hearing Concern, Press Association, RNIB, RNID, TAG, Teletext). However, NTL said that, while it would welcome Ofcom's advice on standard abbreviations, it considered that adherence should be voluntary and that there would be little point in mandating the use of standard abbreviations in EPGs if they were not also used by the print media.
- 2.15 Sky said that Ofcom had failed to demonstrate that mandating standard indicators was proportionate and warranted. It said that Ofcom's final decision on whether, and if so, what standard indicators should be adopted should balance the additional benefits of standardising indicators against the burden on EPG providers. Sky said that it was unclear from Ofcom's regulatory impact assessment on what basis Ofcom had reached the conclusion that standard abbreviations would bring about more opportunities for people to understand and enjoy television, and would lead to larger audiences for programmes with access services. It concluded that, in the absence of an analysis demonstrating that mandating standard abbreviations would be appropriate, it would not be appropriate for Ofcom to proceed with this approach.

## Ofcom's response

- 2.16 We note that there is general agreement that mandating standardisation is appropriate. As regards NTL's suggestion that a voluntary approach would have been better, Ofcom remains of the view that mandatory approach is the only way of providing certainty that standard abbreviations will be used on broadcast EPGs, and that this will increase the likelihood that they will be used voluntarily by publishers of printed and online media, to the benefit of people using access services.
- 2.17 As regards the points made by Sky, it is clear from research that many potential beneficiaries do not use access services<sup>2</sup>. It is reasonable to conclude that this is due in part to the absence of information about some or all access services on

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<sup>2</sup> Independent research commissioned by the RNID found that there were about 9 million deaf or hard or hearing people in the UK (see paragraph 20 of Annex 4 to Ofcom's *Statement on the Code on Television Access Services*, 26 July 2004. [http://www.ofcom.org.uk/consult/condocs/tv\\_access\\_services/statement/statement.pdf](http://www.ofcom.org.uk/consult/condocs/tv_access_services/statement/statement.pdf)). This compares with some 5 million people who actually use subtitling on a regular basis (see paragraph 5 of Annex D to the Ofcom's *Consultation on the draft code on providing television access services*, December 2003) [http://www.ofcom.org.uk/consult/condocs/tv\\_access\\_services/prov\\_tv\\_access/consultation/annexd/?a=87101](http://www.ofcom.org.uk/consult/condocs/tv_access_services/prov_tv_access/consultation/annexd/?a=87101)).

some channels and on some platforms<sup>3</sup>. The requirement to include this information in the form of standard abbreviations in programme synopses will help to remedy this problem by making the availability of access services transparent to people with disabilities, as well as those who may help them. Increased awareness should in turn increase the likelihood that people with hearing and sight impairments will be able to find programmes with access services, and to watch them.

- 2.18 As Sky notes, Ofcom believes that it would be impracticable to quantify these benefits, though we did describe five distinct benefits which we considered would arise<sup>4</sup>. In the light of support from organisations representing the interests of disabled viewers<sup>5</sup>, Ofcom is satisfied that the benefits would be significant, and would outweigh the relatively modest costs, to the extent that these have been disclosed to Ofcom<sup>6</sup>. Given Ofcom's duty to have regard to the needs of persons with disabilities (section 3(4)(i) of the Communications Act 2003), we are therefore satisfied that this initiative is both warranted by the benefits, and proportionate, given the cost indications supplied by EPG providers.

## Other issues

- 2.19 Respondents made a number of other points:

- (a) several attached importance to the use of standard abbreviations in published listings (the BBC, Channel 4, five, NTL, TAG). The Press Association said that a number of its print customers would be happy to use the same abbreviations as EPGs, provided they were concise. ITFC and the Press Association said that upper case abbreviations should be used;
- (b) disability groups and others (Hearing Concern, RNIB, RNID, TAG and ITFC) accepted that it was not currently practicable to make use of standard symbols (as none exist, amongst other reasons), but pointed to the work on this being undertaken by the European Technical Standards Institute, and asked that Ofcom take this into account in future;
- (c) several respondents wanted EPGs to make it easier for viewers to find programmes with access services, through effective search engines (RNIB), separate weekly listings of programmes with access services (ITFC) and guidance in the EPG about how to find information about access services (RNID);

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<sup>3</sup> See Table 1 of Ofcom's *Standard abbreviations for television access services* to see what information is currently omitted from EPGs.

[http://www.ofcom.org.uk/consult/condocs/tvaccess\\_abbr/standard\\_abbrtv.pdf](http://www.ofcom.org.uk/consult/condocs/tvaccess_abbr/standard_abbrtv.pdf)

<sup>4</sup> See paragraph 4.8 of section 4 of Ofcom's *Standard abbreviations for television access services*.

<sup>5</sup> See, for example, paragraph 25 of Ofcom's Statement on *Code on Electronic Programme Guides*, 26 July 2004. <http://www.ofcom.org.uk/consult/condocs/epc/statement/statement.pdf>.

<sup>6</sup> See paragraph 4.7 of section 4 of Ofcom's *Standard abbreviations for television access services*.

- (d) some respondents wanted Ofcom to encourage manufacturers to develop relevant equipment and related software, such as digital receivers that provided voice-out confirmation of EPG instructions (RNIB) and enabled abbreviations to be displayed in a separate field in the main listings (Channel 4), or remote controls that provided one-touch access to subtitles and audio description (RNID and RNIB); and
- (e) both RNIB and TAG pointed to the need for broadcasters to supply EPG providers with timely and accurate information on programmes with access services. TAG emphasised the need to raise awareness about access services amongst potential beneficiaries, noting that existing confusion about how to access analogue subtitling could be exacerbated as more people switched to digital services.

## **Ofcom's response**

### 2.20 Ofcom:

- (a) agrees that it would be highly desirable if publishers of printed and online television listings used the same standard abbreviations, and has taken this into account in selecting the abbreviations to be used. Ofcom is not in a position to make this contingent upon their use by publishers of printed and online listings, since we do not regulate them. However, we shall encourage them to use the same abbreviations, and consider that a standard approach and short abbreviations in broadcast EPGs makes it more likely that other listings publishers will follow suit;
- (b) is aware of work that ETSI is doing to look at the possibility of standard symbols across Europe, and will consider whether it may be appropriate to encourage or mandate the use of international symbols in EPGs in future. In doing so, it will take into account issues such as whether such symbols are likely to be more or less easily understood than abbreviations, the implications for those whose digital receivers would not be able to display symbols, and the estimated costs and benefits of implementing the use of symbols;
- (c) agrees that EPGs that facilitate searching for programmes with access services would be extremely helpful. In Ofcom's discussions with manufacturers of digital receivers, they have made clear that if broadcasters include metatags in their transmissions which identify relevant access services, there are reasonable prospects that some manufacturers would be prepared to provide search functionality. Indeed, Ofcom believes that the likely growth of video-on-demand and the scope to store programming (e.g. with digital or personal video recorders) will lead EPG providers to incorporate increasingly sophisticated search facilities over time). At present, the provision of metatags is patchy, and those that are broadcast are not always reliable indicators of whether or not an access service is actually being provided. Pending the development of effective search engines within EPGs, Ofcom is encouraging EPG providers and broadcasters to supplement the

information in general listings with specific listings of programmes with access services, for example on websites or in interactive pages;

- (d) will maintain a dialogue with manufacturers of digital receivers through organisations such as Intellect and the Digital Television Group with the aim of encouraging them to include capabilities that will be benefit disabled users, as well as consumers generally. It will also consider whether it would be appropriate to support relevant projects having regard to its duties under section 10 of the Communications Act. However, Ofcom does not regulate manufacturers, and so cannot require them to incorporate particular functionalities in their equipment;
- (e) agrees that it is important that broadcasters supply EPG providers and intermediaries with accurate and timely information on programmes with access services. This has not always been the case in the past, and Ofcom will work over the coming months with broadcasters, listings compilers and EPG providers to establish where the problems lie, and how best they can be addressed.

## Annex

# Code amendments

- A1. In order to give effect to Ofcom's decision on the use of standard abbreviations to denote television access services in EPGs, paragraph 11 of Ofcom's Code on Electronic Programme Guides has been amended as follows:

*11. EPG providers will be required to ensure that information included in relation to television programmes indicates which programmes are accompanied by television access services. A corresponding provision has been included in the Code on Television Access Services requiring broadcasters to make such information available to EPG providers. Where practicable, programme information in the EPG should indicate by means of standard abbreviations the nature of the access service provided. Where applicable, the programme synopsis in the EPG should indicate which programmes are accompanied by television access services, using the following upper-case letters - subtitling (S), signing (SL) and audio description (AD). Where practicable, these abbreviations should be explained in an appropriate part of the EPG. If non-standard terms are used in any part of the EPG, and removal or replacement by the standard abbreviations would require software or hardware updates, this should be done at the next reasonable opportunity.*

- A2. For the same purpose, paragraphs 29 and 30 of Ofcom's Code on Television Access Services have been amended as follows:

*29. Ofcom requires television service providers to promote awareness of the availability of their television access services to potential users of the services by making available accurate and timely information to electronic programme guide (EPG) operators listing their services, and by providing similar information on their website. Ofcom has imposed corresponding obligations on EPG operators through the code to be made under section 310 of the Act. Broadcasters who provide programme synopses for use in EPGs should indicate which programmes are accompanied by television access services by including the standard upper-case acronyms for subtitling (S), audio description (AD) and signing (SL).*

*30. Ofcom will also expect television service providers to demonstrate that they are taking effective steps to publicise awareness of their television access services through other means, including periodic on-air announcements and information in publications aimed at persons likely to benefit from television access services. Where the nature of the access service is not spelt out in full, the standard abbreviations referred to in paragraph 29 above should be used.*

- A3. The full versions of the amended Codes may be found on Ofcom's website.