

The logo for The Authority for Television On Demand (ATVOD) features the acronym "ATVOD" in a bold, white, sans-serif font, centered within a solid black rectangular background.

THE AUTHORITY FOR TELEVISION **ON DEMAND**

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# **Provision of Video on Demand Access Services - 2013 Report -**

**A report on the level of provision by On Demand Programme Service providers of subtitling, audio description, signing and other services for people with disabilities relating to sight or hearing or both**

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## Executive Summary

As part of ATVOD's duty to encourage services providers to make their On Demand Programme Services ("ODPS") more accessible to people with disabilities affecting their sight or hearing, ATVOD conducts an annual survey of current levels of provision of such 'access services'. The first such report was published in November 2011.

This report details the responses we received to our third major survey of regulated service providers which closed on 27 September 2013. ATVOD invited all providers of ODPS to indicate the scale of provision of each type of access service, together with any future plans for access service provision.

Responses were received from forty-three service providers<sup>1</sup>, including three who also operated platforms for VOD services (eg. set top boxes). This is a significant increase on 2012, when seventeen service providers responded, and ATVOD thanks those service providers who took the time to respond.

ATVOD notes however that the over half of service providers did not respond to the request, and will consider, in consultation with the Industry Forum and other stakeholders, whether next year the survey should take the form of a statutory demand for information under section 368(O) of the Communications Act 2003. This would ensure that a more complete account of the provision of access services on video on demand ("VOD") services can be published.<sup>2</sup>

### Key Findings in 2013

- Public service broadcasters ("PSBs") such as Channel 4 and ITV once more appear to be making the most significant progress in access services provision, particularly in relation to subtitling.
- Even on those services which do provide access services, the availability of the access services will depend on exactly how the service is accessed.
- Those who already provide access services are expanding that provision. However, there are few new providers of access services.
- There is continued debate over whether content providers or platform operators have responsibility for ensuring access services are delivered to consumers.
- Service providers described various obstacles to access service including interrelated technological, operational and cost issues.

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<sup>1</sup> ATVOD's notification requirements changed in 2013 with the result that most providers have only one 'service' notified to ATVOD, many of which are available on multiple outlets (e.g. via a website and a set top box). Hence the responses to this survey were given in relation to forty-two notified services but detail access service provision on many more consumer outlets.

<sup>2</sup> A failure to comply with such a demand for information could ultimately lead to enforcement action by Ofcom, including the imposition of a financial penalty.

In 2012 ATVOD published 'Best Practice' guidance in relation to access service provision, developed via the ATVOD Industry Forum working party with service providers and other stakeholders including those representing the interests of people with relevant disabilities. In 2013 this working party developed into a technical forum which continues to share information and consider in detail the most promising technical standards for access service provision. ATVOD's view is that this is currently the best way to overcome the barriers to provision identified in this survey. ATVOD has also begun a review of its Access Services Plan and expects to publish a new plan in the first quarter of 2014 following consultation with stakeholders.

## Introduction

ATVOD is designated by Ofcom as the appropriate regulatory authority for editorial content on video-on-demand ("VOD") services that meet the definition of an on-demand programme service ("ODPS"), as defined in section 368 of the Communications Act 2003 ("the Act"). In performing that role, ATVOD is committed to encouraging service providers to make their services more accessible to people with disabilities affecting their sight or hearing at a key time in the development and use of on-demand services<sup>3</sup>. Making services more accessible will normally mean providing programmes with subtitling, audio-description or signing. We refer to such techniques as "access services".

On 18 February 2011, ATVOD published its Access Services Plan ("the Plan") setting out how it would encourage services providers over the short to medium term. The Plan included an intention to publish updated information on which service providers are providing services which make those services more accessible to people with disabilities affecting their sight or hearing or both and information on such services.

This report details the responses we received to our third survey of regulated service providers which closed on 27 September 2013.

## The Questionnaire

The aim of the questionnaire was to provide information on current levels of provision of access services in On Demand Programme Services ("ODPS"), in order to enable stakeholders, including people with relevant disabilities, to identify which specific access services are being offered on which services.

ATVOD invited all providers of ODPS to indicate the scale of provision of each type of access service, together with any future plans for access service provision. This year, for the first time, Service Providers were asked to detail their provision of access services not only

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<sup>3</sup> Under Paragraph 5(v) and Paragraph 7(xx) of its Designation, ATVOD is required "to encourage Service Providers to ensure that their services are progressively made more accessible to people with disabilities affecting their sight or hearing or both"

on their own websites or platforms, but also on a number of leading third party platforms (if their service was provided to consumers through such platforms). The purpose of this was to identify, at least in part, the extent to which access services were being provided on media outlets most likely to be used by consumers

A copy of the questionnaire is provided as Annex 1. A list of service providers invited to complete the questionnaire is provided as Annex 2.

## The Responses

Responses were received from forty service providers, listed here together with the name/brand of their On Demand Programme Service.

965 TV Ltd

Studio66 TV

Arts Council

The Space

Blinkbox Entertainment

Blinkbox / Clubcard TV

British Sky Broadcasting Ltd

Sky on On Demand

British Telecommunications PLC

BT TV

Broadcasting (Gaia) Limited

Amateur Girlfriends/100% Babes/Barley Legal TV/Hustler XXX Movies

CBS Chellozone UK Channels Partnership

CBS Reality

Channel 4 Television Corporation & 4Ventures Ltd

4OD

Channel 5 Broadcasting Ltd

Demand 5

Chelsea Digital Media

Chelsea TV Online

Classical TV Ltd

Classical TV

Digitaltheatre.com Limited

Digitaltheatre.com

Discovery Communications Europe Ltd

Discovery Networks Video-on-Demand

Estuary TV

Channel 7

Filmon TV Ltd

Filmon.com

Fox International Channels UK Ltd

Fox International Channels (Inc. Fox, Nat Geo, Baby TV)

JimJam Television Ltd

JimJam  
ITV Consumer Ltd  
    ITV Player  
Lavish Fiction  
    Cinematico  
Lifetime Vision Ltd  
    The Lovers' Guide  
MTV Networks Europe  
    MTV  
Nickelodeon  
    Nickelodeon & Nick Jr  
Northern Visions  
    Northern Visions / NvTv  
OT Publishing Ltd  
    OT Publishing Ltd  
Paramount UK Partnership  
    Comedy Central  
Playboy TV UK Benelux Ltd  
    Playboy TV  
Portland Broadcasting Ltd  
    Television X  
RHF Productions  
    Red Hot / Primetime  
Scripps Networks International (UK) Ltd  
    Food Network / Travel Channel  
SJL Consultants  
    Miss Jones Products  
STV Central Ltd  
    STV Player  
The Walt Disney Company Ltd  
    On Demand/VOD Services of The Walt Disney Company Limited  
    Disney Channels On Demand, Disney XD On Demand, Disney Junior On Demand,  
    Disney Movies On Demand, ABC TV On Demand, Disney Channel Avant-Premiere,  
    Disney Channel Replay, [Disney.co.uk/disney-channel](http://Disney.co.uk/disney-channel)  
Universal Pictures Subscription Television Ltd  
    Picturebox Films  
UK Gold Services Ltd  
    Dave  
UKTV Media Ltd  
    UKTV Network (Dave, Gold, Alibi, Yesterday, Eden, Home, Good Food, Drama, Watch,  
    Blighty)  
UKTV New Ventures Ltd  
    Yesterday  
UTV Television  
    U.TV / UTV Player  
Virgin Media Ltd  
    Virgin Media On Demand

WMIT Ltd  
 splatbukake.com / sexyukpornstars.com / ukpornparty.com  
 Zonemedia Broadcasting Ltd  
 Extreme Sports Channel

Of these service providers, thirty two did not provide any access services.

Responses were also received from the Commercial Broadcasters Association (COBA) and from two confidential respondents.

Three service providers (FilmFlex Movies, TalkTalk PLC, and Viasat Broadcasting UK Ltd) submitted a response to the 2012 survey but did not provide information for 2013.

For a full list of the eighty eight service providers invited to respond in 2013, please see Annex 2.

## Services for people with disabilities relating to hearing

### Subtitles

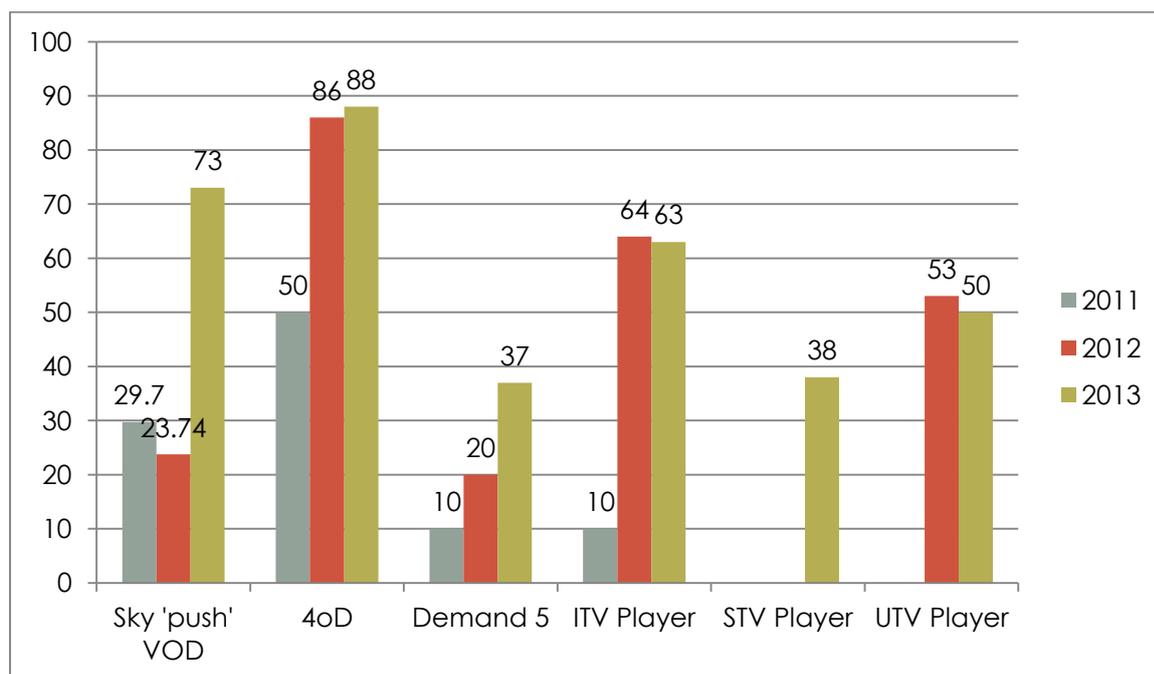


Figure 1: Provision of subtitles as percentage of total programme hours<sup>4</sup>

Seven respondents offered subtitles to consumers. This included the Arts Council’s ‘The Space’ website (no figures provided), Sky Push VOD material, and five PSBs: Channel 4, Channel 5, ITV, STV and UTV. This includes five respondents who were already providing

<sup>4</sup> Figures are for the ‘best performing’ outlet of the service. Figures for the service may be significantly lower (or zero) when the same service is accessed through a different platform or outlet.

subtitles in 2012 and two respondents (Arts Council and STV) who have since begun providing subtitles.

Provision of subtitling was greatest on providers' own branded websites or (in the case of Sky) their own set top box service. Channel 4's subtitling provision remains the highest in terms of percentage of total programme hours, with 88% of the programme hours on its 4oD online service including subtitles. However, in common with other services, this figure is not replicated for versions of the service provided to the public through a number of different outlets. This issue is discussed further at the end of this section. Looking forward, Channel 4 state that their aim is to provide subtitles and audio description on the C4.com catch-up service *"where there is technical capability to support them, in line with the voluntary commitments made for linear services – 100% and 20% respectively"*. Archive content without subtitles has previously been subtitled on 4oD only *"if requested by a user"*. However, *"as resources allow, archive content is being reviewed and given subtitles, prioritising more popular and recent content"*. Channel 4 *"has a representative on the ATVOD working group which is aiming to agree on a set of technical standards for access services that would be available for broadcasters and supported by manufacturers. If achieved, Channel 4 would hope to utilise these standards to introduce access services on a wider range of outlets."*

Channel 5 had significantly increased its subtitling provision on the Demand 5 website, with the result that the number of programme hours provided with subtitles had almost doubled from 20% in 2012 to 37% in 2013. This percentage is expected to rise as Channel 5 has, since the reporting period, increased its VOD subtitling ability to include all material subtitled on the linear service. Also since the reporting period, Channel 5 had begun to provide subtitles on its iOS applications, and detailed plans for broadening subtitle provision – to its YouView apps in Q4 2013 and to all wholly owned applications (Roku, Windows 8, Android, PS3, XBOX) by Q1 2014.

Sky had also significantly increased the number of programme hours provided with subtitles on its 'push' VOD services via the Sky+/Sky+HD set top box, from 24% in 2012 to 73% in 2013. However, Sky was not able to confirm plans for inclusion of access services on its significantly larger 'pull' VOD services (see 'Barriers to Provision' below), stating that it continued to *"explore the range of options available for the gradual introduction of subtitles and audio description on programmes made available on Sky On Demand via all outlets"*.

As a new provider of VOD subtitling, STV has made significant progress, moving from no subtitle provision in 2012 to 38% of programme hours subtitled on the STV Player in 2013.

STV has also altered its processes (during the reporting period) and since November 2012 has provided subtitles with 80% of the programmes available on STV Player on its own brand website. STV had since become available on a Windows 8 app (on tablets) which includes subtitles as per the STV Player website. STV plans to increase the provision of subtitling on the remaining three regional editions of *STV News at Six* programmes, and by Q1 2014 will review the ability to provide subtitles on iOS and Android outlets (smartphones and tablets) and YouView. In the latter case *"[i]mplementation is subject to a system fix – pending remedial action by YouView... there is currently a platform 'bug' on YouView which prevents using the subtitle file format STV is generating for other platforms."*

UTV's subtitle provision remained at 2012 levels, falling slightly from 53% of programme hours to 50% in 2013.

ITV is working towards being able to offer subtitling for 100% of paid-for programmes on the ITV Player, and to *"increase the number of popular programmes subtitled live on linear which are repurposed for the ITV Player catch-up service."* ITV *"is also currently working on the provision of subtitling for on-demand programming within the ITV Player app for iOS mobile devices and tablets"*. However, ITV's provision of subtitling on the ITV Player as accessed through the website remained, at 63% of programme hours, broadly the same as in 2012, having increased from 10% to 64% between 2011 and 2012.

Of respondents not currently providing subtitles on their own services, nine planned to do so in future.

BT intends to work on improving accessibility to its VOD content on the platform. More specifically, BT intends to supply subtitling for a range of on-demand content on the YouView platform from summer 2014, and to work on improving accessibility to its own VOD content on the Vision+ platform.

Chelsea TV plans to upgrade its video player in the next 12 months to a provider which offers accessibility features.

Discover is *"working towards providing DVB format Hard of Hearing subtitles...to Virgin and STL format Hard of Hearing subtitles to BT Vision, where available from linear channel."*

Filmon is asking providers to deliver content with subtitles where available and in the meantime is *"looking into the technical development of our delivery platforms in order to enable subtitle provision"*.

MTV is looking to implement closed caption delivery for hard of hearing on full length content, either as a digital track or burnt into a version of the video, stating that their *"VIMN online and mobile video players do support a digital track, allowing the user to toggle on or off, or select a language"*. In relation to third party platforms, MTV stated that it *"would need to review on a case by case basis depending on technical integration"*.

The future plans of providers are in many cases linked to perceived barriers to provision. Blinkbox is working with content providers *"to try and find a cost-effective solution for all parties in order to deliver such functionality to our customers"*. Disney is working with platforms to overcome various issues, but without a fixed timeline. Fox stated that it made subtitling available to platforms wherever possible (on 100% of programme hours made available to Sky platforms and on 13% of programme hours made available to Virgin), but that *"it is at the platforms discretion to make access services available to their subscribers"* and that these platforms have confirmed that during the reporting period they did not make these access services available to their subscribers. With regard to Fox's branded web outlets, *"we do not have any plans to provide access services on them as they form part of our Baby TV offering which is focused towards children under the age of 3."*

The provider of the Travel Channel stated that since its VOD services are provided internationally, *"programmes are subtitled in the local language which has the benefit of providing access to our programmes for those viewers who are hearing impaired"*.

## Signing

As in previous years, signing remained significantly less widely available than subtitling. Two services – ITV and UTV – included signed programmes. ITV provided subtitling for 0.5% of its programme hours, while UTV provided one signed programme (0.02% of programme hours).

Both Disney and Sky stated that while they do not provide signing on their VOD content, they contribute to the British Sign Language Broadcasting Trust's ("BSLBT") fund (towards the BSL Zone of the Community Channel).

## Services for people with disabilities relating to sight

### Audio Description

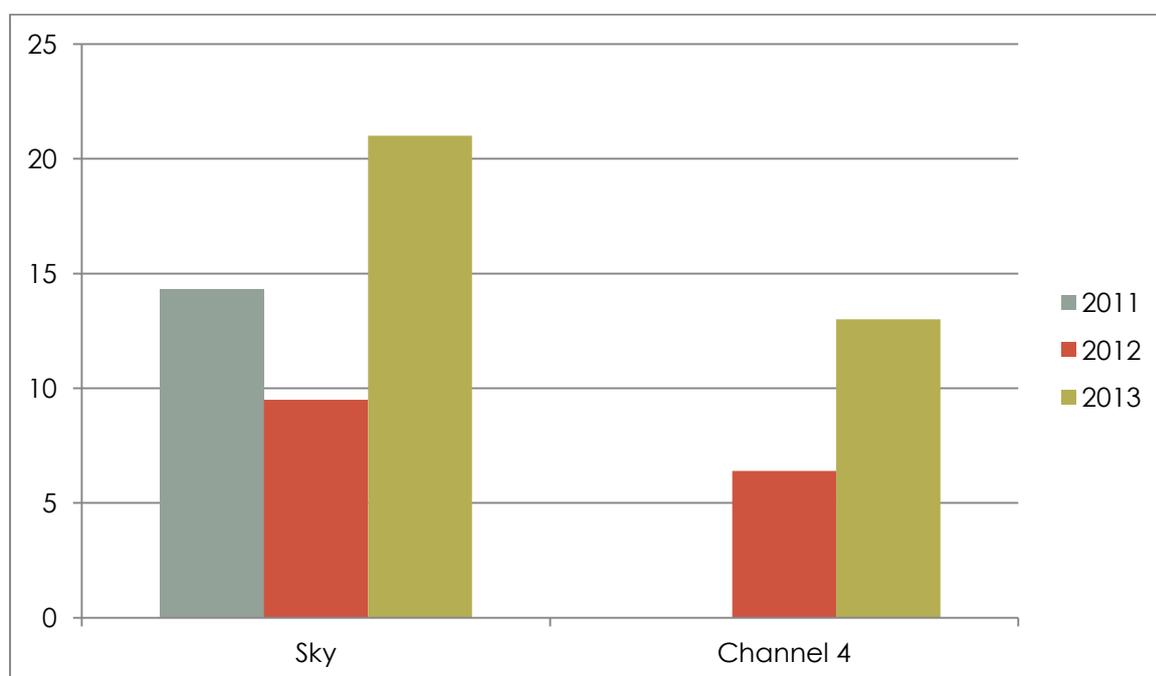


Figure 2: Provision of audio description as percentage of total programme hours<sup>5</sup>

As in both previous surveys, two respondents (Sky and Channel 4) detailed levels of audio description available on VOD services, with a third (The Arts Council) providing audio description in respect of which no figures were submitted. Both Sky and Channel 4 had made significant progress. As with subtitles, Sky provided audio description on its 'push' VOD service as made available through the Sky+/Sky+HD set top boxes, but not on its larger 'pull' VOD services. The percentage of programme hours with audio description on the 'push' VOD service has more than doubled from 9.5% in 2012 to 21% in 2013.

<sup>5</sup> Figures are for the 'best performing' outlet of the service. Figures for the service may be significantly lower (or zero) when the same service is accessed through a different platform or outlet.

Similarly, Channel 4 has also doubled the amount of hours with audio description available on its 4oD online service, from 6.4% in 2012 to 13% in 2013, but does not make programming available with audio description on other versions of the service. As with subtitling (see above) Channel 4's intention is to supply audio description on the C4.com catch-up service in line with the voluntary commitments made for services, which for audio description is 20%.

Of those not currently providing audio description, five had plans to do so in the future. As with subtitling, BT intends to provide audio description via the YouView platform from summer 2014, and is working on improving accessibility to its content available on the Vision+ platform (which currently only provides access services where they are delivered with PSB content). Channel 5 expects to begin to provide audio description where present on its linear services to VOD content on its website in Q1 2014, and also expects to roll out audio description to iOS and YouView apps in 2014. ITV hopes to provide audio description for VOD within the ITV Player made available at itv.com in 2014. Chelsea TV plans to upgrade its video player in the next 12 months to a provider which offers accessibility features. Discovery is working towards providing Audio Description on its VOD content on the Virgin platform where available from the linear channel.

## Platform capabilities

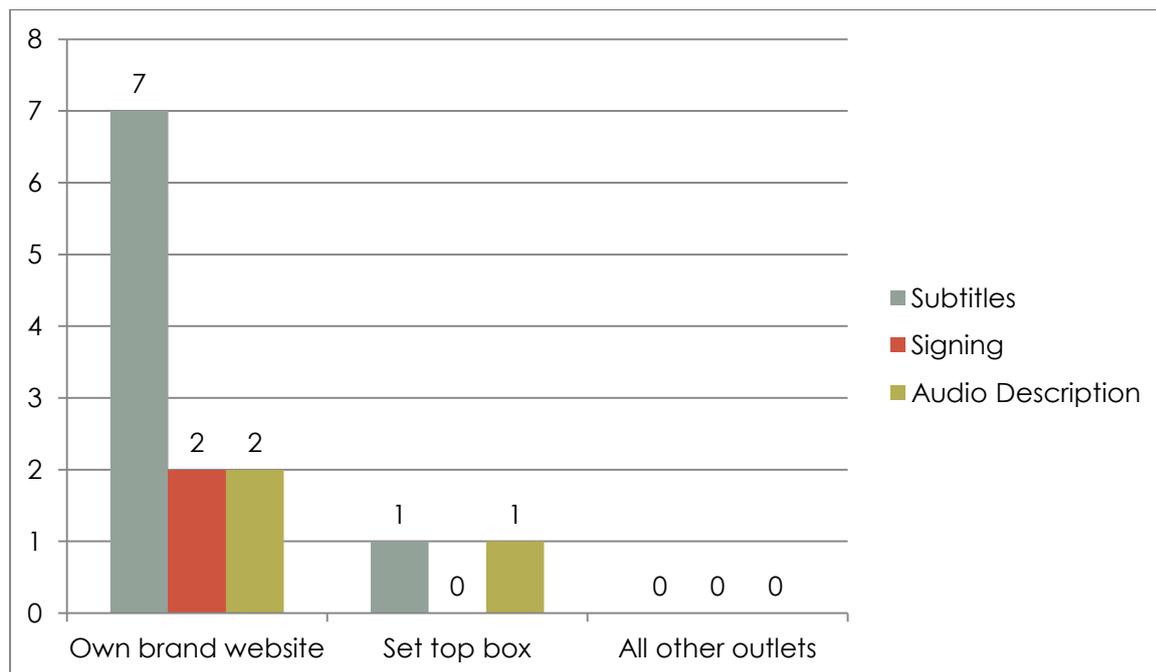


Figure 3: Provision of access services by outlet – number of services providing specified access service on particular outlets.

As can be seen from Figure 3 above, provision of access services is significantly greater on platforms over which the provider exerts direct control. During the reporting period, this meant that access services were almost exclusively provided on own-brand websites, with

only Sky providing subtitles and audio description on its own set-top-box outlet. As detailed above, several providers told ATVOD that they have since either started providing, or have concrete plans to provide, access services on their own brand apps for mobile devices (such as smartphones and tablets), for games consoles, and for YouView.

Of the outlets listed in QA1 of ATVOD's questionnaire (see Annex 1) those provided through a platform (such as a set-top-box) operated by a third party platform operator posed the most problems for access service provision. In these cases the ability to provide access services depends significantly on the extent to which the platform supports access services and on technical compatibility issues. For example, in relation to Samsung and LG smart TVs, STV commented that *"the platforms currently do not provide Software Development Kits to facilitate the provision of subtitles. Therefore the capability would have to be built from scratch by STV. The expectation is that both the LG and Samsung apps will support subtitles in Q1-2014"*.

Respondents to this survey included major platform operators who operate their own VOD service and also carry third party VOD services on their platforms. Such respondents were asked to complete specific questions about the extent to which the platform supports the provision of access services on VOD services provided by third parties.

Responses were received in relation to three platforms (Sky+/Sky+HD Set Top Box; Virgin Tivo; BT Vision+ / YouView)

Sky continues to enable all three access services (subtitling, signing and audio description) on its 'push' VOD services via the Sky+ / Sky+HD set top boxes, while its Sky Go platform supports signing and audio description but not subtitling. Provision of these access services is *"at the discretion of the third party and the third party must ensure that the relevant access service has been "burnt" onto the tape provided to Sky"*. Sky's other platforms do not enable access services (see 'barriers to provision' below), although *"Sky continues to evaluate the range of options of how these access services can be introduced"*.

As in 2012, BT do not supply subtitled or audio described VOD content on the Vision+ platform, *"with the exception of catch-up programmes where they are supplied by public service broadcasters"*. BT is also involved in the YouView, which *"currently, depending on content, provides subtitling, sign language, audio description and zoom"*.

Virgin Media's 'Tivo' platform now enables all three access services, if the content provider *"provides us with access services in accordance with VM's technical specification and OFCOM/ATVOD format guidelines"*.

As discussed under 'barriers to provision' below, ATVOD will look to explore any discrepancies between the responses given by content providers and those given by platform operators, for example the statement of Fox that it provides all content to Virgin Media and Sky 'push' services with subtitling but that the platforms do not make these subtitles available to viewers.

## Barriers to provision of access services

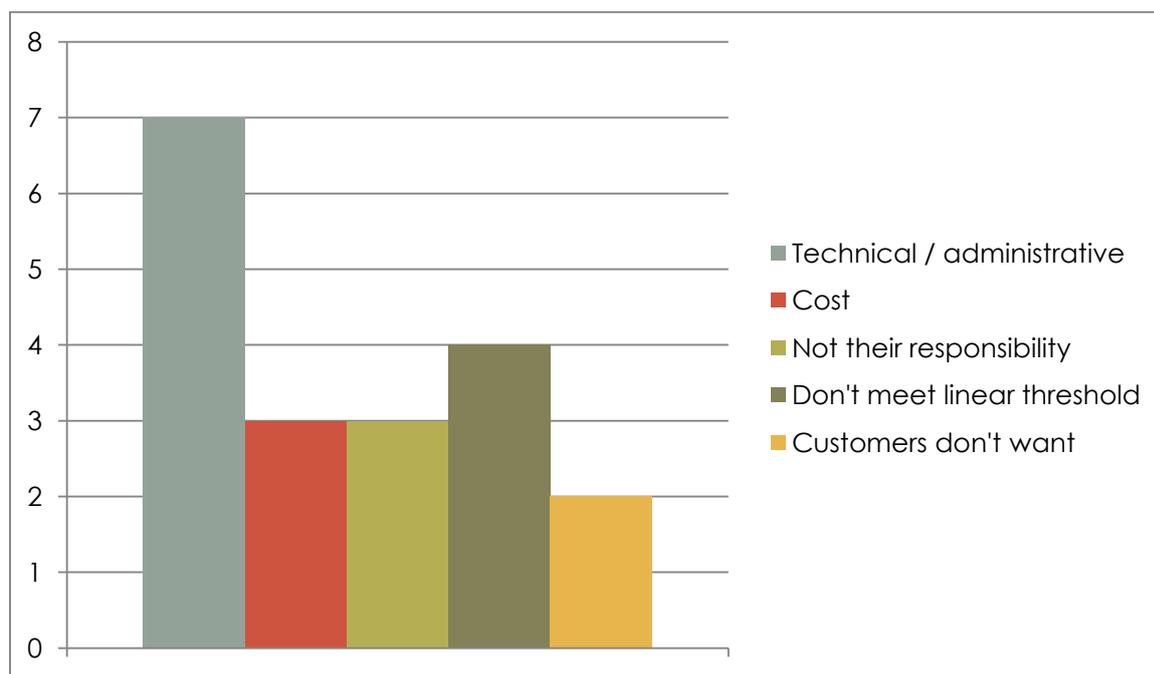


Figure 4: What are the barriers to access service provision?

Respondents identified a range of issues which hindered the provision of access services on video on demand services.

### Access services not required

Two providers (Portland Broadcasting and RHF Productions) felt there was a clear lack of consumer demand for access services for their adult VOD services. Other providers pointed to the fact that their services (CBS Reality, JimJam, Food Network / Travel Channel, confidential respondent) had a limited scale of distribution or that their related linear services were not large enough for access services to be required.

### Access services not available

Where providers are not required to provide access services for their linear services (as above) this means those services do not exist for use on non-linear services. The absence of available access services can also be a problem for larger broadcasters in relation to their archive content (see Channel 4's comments above). UTV stated that the launch of the UTV Player in 2014 *“currently has no provisions to provide audio description or further signing services because of requirements for further development of technology and the cost implications, and also the provision of audio files for AD which are currently unavailable to us.”*

### Whose responsibility is it anyway?

As in previous years, providers drew attention to the relative roles of the content providers and distribution platform operators. Broadcasting (Gaia) Ltd suggested that while it did not

add access services to individual programmes, “[o]nce the films have been supplied, [the addition of access services] is entirely within Virgin’s provenance.” As outlined above (see ‘Subtitles’) Fox stated that while they make subtitles available to Sky and Virgin, “we understand that during the reporting period the platforms did not make such access services available to their subscribers”. While MTV discusses the process of providing access services to third party platforms (see below), it adds: “It is worth pointing out that in all recent 3rd party platform deals that VIMN have undertaken in the UK and across Europe - I have yet to be told by a platform operator that we need to supply subtitle files. There certainly has not been anything mentioned in technical specifications for how we would deliver them.”

On the other hand, platform operators tell ATVOD that access service provision is the responsibility of the content provider. As above, Virgin Media’s Tivo platform supports access services if they are provided in accordance with Virgin’s technical specification, and Sky states that access service provision is “at the discretion of the third party and the third party must ensure that the relevant access service has been “burnt” onto the tape provided to Sky”.

As noted earlier, ATVOD will continue to explore with platform operators and content providers how to overcome such differences.

### **Platform requirements**

In addition to the administrative issues above, regarding responsibility for requesting and providing access services, there are also technological issues over transfer of those access services from content provider to platform operator. A confidential respondent stated that the major UK platform operators have each adopted different file delivery formats for their on-demand platforms. Providing different formats for AD and subtitling assets on each platform gives rise to operational difficulties and disproportionate costs.

MTV states that it could in future map subtitle files to full length VOD assets for insertion into the VITC, or to transform into alternative file formats, and that this could then be “used by platforms that would support extraction of subtitles from within the VITC signal.” However, “[m]any of the platforms we deliver to would not currently support using VITC, as this data is cropped out of the data typically sent to non TV broadcast devices.” In this latter case, “if the playback device supports an alternative method of displaying subtitles, we may need to convert the subtitle file into another format, such as timed text.”

Addressing technical barriers – and especially exploring the possibility of identifying an industry standard – is at the heart of ATVOD’s current access services work and is likely to be a central part of any future plan.

### **Linear to non-linear**

As in previous surveys, providers drew attention to specific technical issues in repurposing linear access services for use on programmes in a non-linear context. MTV suggested that “In all cases, it’s likely that manipulation of the original subtitle file would need to take place, in order to match offsets for edits to the original video file - such as removing pre-cap/re-cap when joining parts, branding and ident insertion, advertising and sponsorship insertion, etc.”. For full length material this may be a viable process, but not be for shorter form, cut down online programmes designed to be fast turnaround, cost effective content.

4oD also addressed this issue, stating that the *“subtitle files created for the linear transmission are the files used for 4oD. However, on occasion the linear transmission cannot be put on the service and a separate VOD version of the programme has to be made. This may be due to compliance, editorial or rights reasons. The VOD version will require its own set of subtitles to be created, commonly delaying their availability.”*

Similarly, a confidential respondent referred to technical complications such as start and end idents and mid-roll promotional insertions which can invalidate a linear file’s timecode data and render associated subtitles out-of-synch on VOD material.

### **Workflow**

Respondents suggested out that if solutions are to be found to these technical issues they could require significant changes to current workflow (with associated costs).

Channel 4 pointed to other operational issues affecting the supply of subtitles and particularly audio description tracks: *“Programmes may be delivered on the day of transmission, sometimes very close to broadcast. In this situation there is often not enough time for audio description to be recorded and the linear transmission will be live-subtitled, which cannot later be added to 4oD.....In cases of live linear broadcast 4oD cannot currently provide accompanying subtitles as they are not linked to the hard copy of the programme. Subtitles can be provided to 4oD if the live broadcast is repeated on linear, although much of our live programming is shown only once.”*

### **Other technical**

As in 2012, Sky stated that for outlets other than the Sky+/Sky+HD set top box (‘push’ VOD), provision of access services was hindered by server capacity, and/or the increased time it would take for a viewer to download a programme and the impact on a viewer’s broadband download limits, as – for example - *“to currently add subtitles to Sky’s VOD content available via the Sky Go website, Sky would need to make available two versions of the same programme, one with subtitles, one without. The duplication of the same content increases operational complexity and would result in less variety of content being available on the service”*.

Several providers referred in general terms to technological issues, such as “CC technology limitations” (Paramount), or “technical impediments and limitations with platform technologies” (Disney). UTV stated that on the Playstation / mobile platforms UTV currently provides no access services *“because delivery of access services to these devices requires further technological development, which therefore also has cost implications.”*

UTV also provided a note of caution with respect to the pace of progress in this area: *“As a Channel 3 licensee and Public Service Broadcaster UTV understands the need to provide access services via our ODPS for our viewers, however due to financial and technical barriers we are encountering we believe providing and developing further access services, while gradually moving in the right direction, will increase relatively slowly to begin with until further breakthroughs in the delivery technology are made.”*

COBA pointed to technical barriers identified in last year’s report such as storage space, download speed, and the lack of unified standards between content providers and VOD

operators. COBA also pointed to COBA members' involvement in ATVOD's access service working group, stating that they felt this the *"best possible forum for developing practical solutions that encourage and enable the further development of access services for non linear services"*.

### **Cost**

ATVOD notes that the obstacles outlined above are generally associated with cost implications. These implications were highlighted by some respondents, for example Digital Theatre, and Blinkbox who commented *"Provision of access services is important to blinkbox. However, there is substantial cost involved with providing these services, and therefore we are working with content providers to try and find a cost-effective solution for all parties in order to deliver such functionality to our customers."*

### **Next steps**

ATVOD will continue to encourage service providers to make their services more accessible to people with disabilities affecting their sight and/or hearing. In particular, it will:

- Develop an updated Plan for encouraging access service provision, in consultation with relevant stakeholders, including the Industry Forum and those representing people with relevant disabilities.
- Consider, in consultation with the Industry Forum, whether to make responses to future surveys compulsory by using a demand for information under s368O of the Communications Act.
- Continue to engage with service providers and other relevant stakeholders, for example by means of the ATVOD working party on access services
- In particular, continue to work with the ATVOD technical working group, focussing on sharing information and identifying the most promising technical standards for access service provision.

## Annex 1

### Access Services- Public Information Questionnaire

As part of ATVOD's duty to encourage service providers to ensure that their services are made progressively more accessible to people with disabilities relating to their sight or hearing or both, and in accordance with ATVOD's Access Services plan published on 18 February 2011, we are again inviting all providers of On Demand Programme Services ("ODPS") to provide details of the current level of provision of such access services on their ODPS.

**The information provided (with exceptions as indicated) will be published on the ATVOD website** in order to enable stakeholders, including people with relevant disabilities, to identify which specific access services were being offered on which services, and to indicate in each case the scale of provision of each type of access service. As with the 2012 report it is expected that the 2013 report will identify all those service providers who were invited to respond.

If you provide more than one ODPS, please complete a separate questionnaire for each one.

### Part A for providers of ODPS

#### Respondent details

Name of ODPS:

ODPS reference number:

Contact name: [Not for publication]

Contact email: [Not for publication]

Contact phone number: [Not for publication]

## Accessibility Overview

Q A1 How is this ODPS made available? Please tick as appropriate in relation to the following outlets. For each relevant outlet, please indicate the provision of each specified access service.

Outlet	Tick if service available via this outlet	Subtitles	Signing	Audio Description	Other (Please specify)
Own brand website (excluding apps developed for particular platforms / devices)					
Own brand YouTube Channel					
Own brand YouView app					
Virgin TiVo					
Sky Go					
Sky Anytime/Showcase					
Sky Anytime+/On Demand					
Games Console (please specify)					
Own brand phone app					
Own brand tablet app					
Own brand Connected TV app					
Other					

Q A2 Answering only for those outlets on which you provide access services, please indicate:

- i. The **total hours** of programming provided on your ODPS via this outlet
- ii. The **total number** of programmes provided on your ODPS via this outlet
- iii. The number of programme hours provided with each specified access service
- iv. The number of individual programmes provided with each specified access service

Please take the 12 month period from 1 April 2012 to 31 March 2013 as your reference period. If you are using a different reference period, please indicate this.

Outlet	Total hours	Total number	Subtitles	Signing	Audio Description	Other (Please specify)
			Hours/Programmes	Hours/Programmes	Hours/Programmes	Hours/Programmes
Own brand website						
Own brand YouTube Channel						
Own brand YouView app						
Virgin TiVo						
Sky Go						
Sky Anytime/Showcase						
Sky Anytime+/On Demand						
Games Console (please specify)						
Own brand phone app						
Own brand						

tablet app						
Own brand Connected TV app						
Other						

## Plans for future provision

Q A3

Please answer these questions in relation to your plans for provision of all the access services outlined in A2 above

- a) On those outlets on which you provide access services, can you indicate any plans for increasing the current scale of provision (eg. timetable for increasing current scale of provision)?
  
  
  
  
  
  
  
  
  
  
- b) If any outlet on which your ODPS is provided does not currently provide access services, can you indicate any plans for providing programmes with the relevant access services in future (eg date on which you intend to begin provision, which services will be provided and across which outlets)?

## Part B

### Platforms providing access to third party ODPS

***This section should only be completed if you operate a platform which provides access to one or more ODPS provided by a third party.***

Although such platforms do not fall under ATVOD's regulatory remit, their role in enabling access services on ODPS is of great importance and we therefore invite responses to the following questions:

- Q B1. Does the platform you operate currently enable third party ODPS providers to provide access services for users with disabilities relating to hearing?
- Q B2. Do the access services for users with disabilities relating to hearing supported by your platform take the form of:
- Subtitles?
  - Signing?
  - Other (please specify)?
- Q B3. What are your plans for enabling third party ODPS providers to provide access services for users with disabilities relating to hearing in future (eg date on which you intend to begin enabling provision, or timetable for improving the current capability)?
- Q B4. Does the platform you operate currently enable third party ODPS providers to provide access services for users with disabilities relating to sight?
- Q B5. Do the access services for users with disabilities relating to sight supported by your platform take the form of:
- Audio description?
  - Other (please specify)?
- Q B6. What are your plans for enabling third party ODPS providers to provide access services for users with disabilities relating to sight in future (eg date on which you intend to begin enabling provision, or timetable for improving the current capability)?

Q B7 If you currently enable, or have plans to enable access services in relation to the ODPS available on your platform, please give a brief description of the technical means by which these services are or will be enabled.

## Part C

### Feedback

***Please note that the answers to this section are not for publication***

Q C1 How many complaints have you received relating to access services?

Q C2 What are the major issues to resolve which arise from any complaints / feedback?

Q C3 If you have been unable to answer any of the above questions, please provide us with an explanation of any obstacles to obtaining the relevant data (e.g. technical, administrative). This will help ATVOD to refine this questionnaire for future years.

**NB. By returning this form you accept that ATVOD may publish on its website the information provided (with exceptions as indicated).**

Please return completed questionnaire by soft copy to: [contact@atvod.co.uk](mailto:contact@atvod.co.uk)

or by hard copy to

Public Information Questionnaire (Access Services), ATVOD, 27 Sheet Street, Windsor, SL4 1BN

**Closing date for responses: 27 September 2013**

Thank you for responding to this questionnaire. The information you have provided will assist us performing our duty to encourage service providers to ensure that their services are made progressively more accessible to people with disabilities relating to their sight or hearing or both.

## Annex 2 List of providers asked to respond

The Access Services Public Information Questionnaire was sent to the following providers. Please note that not all of them remain providers of an ODPS at the date of publication of this report.

965 TV Ltd	Lovefilm UK Ltd
The Active Channel Broadcasting Ltd	Madame Caramel
AETN UK	Manchester United Interactive Ltd
All3media	Marjan Television Network Ltd
APD Studio Ltd	MTV Networks Europe
Aphrodite Photography	Mystic Online Media Ltd
Arsenal Broadband Ltd	NBC Universal Global Networks UK Ltd
Arts Council England	Nickelodeon UK Ltd
Bay TV Liverpool	Northern Visions
BBC Worldwide	OT Publishing Ltd
Blinkbox Entertainment Ltd	The Paramount UK Partnership
British Sign Language Broadcasting Trust	Paul Raymond Media Ltd
British Sky Broadcasting Ltd	Playboy TV UK / Benelux Ltd
British Telecommunications PLC	Poker Channel Europe
Broadcasting (Gaia) Ltd	Portland Broadcasting Ltd
CBS Chellozone UK Channels Partnership	RHF Productions
Channel 4 Television Corporation & 4Ventures Ltd	S4C
Channel 5 Broadcasting Ltd	SBS Broadcasting Networks Ltd
Channel Entertainment Ltd	Sci Fi Channel Europe LLC
Chelsea Digital Media	Scripps Networks International (UK) Ltd
Classical TV Ltd	S J L Consultants
Community Channel	Sony Entertainment Television
Cross Extreme Ltd	Speedy Bee
Curzon on Demand	St Mackenzies
Digitaltheatre.com Ltd	The Stocking Site
Discovery Communications Europe Ltd	STV Central Ltd
The Walt Disney Company Ltd	TalkTalk
Dixons Retail Plc	Top Up TV Europe Ltd
Elite TV Online	Turner Broadcasting UK Ltd
English Milf	UK Gold Services Ltd
ESPN	UKTV Media Ltd
Estuary TV CIC Ltd	UKTV New Ventures Ltd
FilmFlex Movies Ltd	Universal Pictures Subscription Television Ltd
Filmon TV Ltd	UTV Television
Fox International Channels UK Ltd	Vevo (UK) Ltd
G Spot Productions	Viasat Broadcasting UK Ltd
Greystone Media Ltd	Vidinet Ltd
ITV Consumer Ltd	Virgin Media Ltd
JimJam Television Ltd	Vubiquity Management Ltd
Journeyman Pictures	WMIT Ltd
Kotai Entertainment Ltd	Zonemedia Broadcasting Ltd
Lavish Fiction	
Levant TV	
Lifetime Vision Ltd	
Liverpool FC and Athletic Grounds Ltd	
Localbuzz Media Network Ltd	