



2019 EPG Accessibility Statement

12 December 2019

1. Introduction

1.1 About Digital UK

Digital UK leads development of Freeview, the nation's most widely used television platform. Our goal is to create the best free TV service, both live and on-demand.

We are responsible for day-to-day operational management, including the Freeview electronic programme guide, and lead on developing platform strategy, working with our broadcast partners and industry.

In September 2015 Digital UK and Freeview launched 'Freeview Play', the new connected TV service which seamlessly delivers on-demand content alongside linear broadcast channels.

Digital UK holds two Ofcom EPG provider licenses: a DTAS license which covers service information (EPG data) that is broadcast via DTT, and a complementary TLCS license for the enhanced service information delivered over IP for Freeview Play receivers

Digital UK is owned by the BBC, ITV, Channel 4 and Arqiva.

1.2 Background to Statement

Freeview is a universally available service offering a range of more than a hundred free-to-air TV, radio and text-based services. It can be found in circa 18 million homes and is the primary broadcast television service in more than 10 million homes.

As such, Freeview aims to cater for the widest possible range of audience requirements, and Digital UK and Freeview are committed to delivering improvements in the accessibility of Freeview products and services every year. This is done in collaboration with our partners, i.e. manufacturers of Freeview receivers, and content providers who make their channels and services available to our audiences.

Digital UK and Freeview operate within a horizontal market. We define the product operating rules for Freeview and Freeview Play devices; however, we do not have direct control of receivers. Manufacturers of Freeview Play devices develop their native UIs, including EPGs, with Digital UK aiming to drive improvements through careful cooperation and engagement with our partners.

2. Executive Summary

In line with our vision to provide the best possible universal TV service, we believe in the need to provide fit-for-purpose accessibility to our viewers.

This is why we are:

- developing an Accessible TV Guide that will become available to circa 7 million connected Freeview Play devices at launch (existing and new) as an application launched by tuning into a specific channel. We are working closely with accessibility groups to ensure expert and user feedback shapes our development;

- working with our manufacturer partners to increase the availability of accessibility services made available in the native UIs of future Freeview Play devices; and
- working to ensure accessibility sits across all our customer touchpoints, from web to mobile.

To help drive accessibility improvements through the whole Freeview Play ecosystem, we are creating an application-based TV guide designed specifically for accessible users. This approach has multiple advantages which underline its potential to become an effective alternative to native UI implementations, such as its prospective availability on circa 7 million Freeview Play connected devices at launch (existing and new, and for all the 20+ brands that support Freeview Play), and a design which builds on input from accessibility user groups at all stages, rather than retrofitting new accessibility features on UIs designed with different goals in mind.

We are very conscious of the importance of testing concept, design and use with accessibility user groups, and we engaged various advocacy groups to participate in formal testing activities and informal showcase sessions. We have received very positive responses to early iterations of the app, and there is excitement to see it released. We are currently planning to launch our accessible TV guide application the end of Q2 2020.

In addition, in the last 12 months we have worked with our device partners operating in the horizontal market to add new accessibility related product requirements for the native UIs of Freeview Play devices that will come to market from 2020 onwards. However, not all manufacturers fully comply due partly to the difficulties implementing local policies in a global market, and the impact to user experience of overlaying features on existing design frameworks. We also foresee limitations in these features being available only to those who purchase a new TV or set-top box.

We are also working with Content Providers on the provision of accessibility services and programming, as effective handover between players and content is essential in ensuring a positive user journey for our Freeview Play viewers.

Beyond Freeview Play devices, we aim to offer accessibility across all customer touchpoints and have therefore also built accessibility support into web, mobile and customer support channels.

3. Freeview Play Accessible TV Guide (Working Title)

3.1 Accessible TV Guide (ATVG) Overview

We are developing a new EPG for all Freeview Play devices, designed specifically for viewers with accessibility requirements.

We are building the Accessible TV Guide (ATVG) as an HbbTV app, but to all viewers with a connected Freeview Play TV, it will appear as an additional channel which can be accessed via keying in the channel number on a remote control (or via the traditional EPG if accessibility needs allow / initial assistance is present). We published a consultation on the use of channel number 555 for this purpose. This is because it is simple to remember and promote, there is often a raised node on the number 5 button of remote controls (further increasing accessibility), and it is an existing button on all remote controls, therefore ensuring the solution

also works on legacy devices. Our consultation also raised the option of using channel number 258 as an alternative.

The ATVG will be available on all connected TVs with Freeview Play. We estimate this to be 7 million households at launch, with expected growth of 2 million per annum.

3.2 Benefits of the ATVG

The ATVG user interface and experience has been designed with accessibility in mind from the outset. This has allowed us to focus on not just the *provision* of the accessibility features prioritised in Ofcom's report, but to also ensure that the experience and usability of these features for viewers is the best it can possibly be. This is more difficult to achieve when overlaying new features on existing systems as the guidelines for the core design are already in place and complex to alter.

As the ATVG will be an application delivered via IP on all connected Freeview Play devices, the functionality will be immediately available, regardless of the age of Freeview Play device. Native UI implementations will in most cases be specific to new models, therefore requiring a new device to benefit from additional features. The average TV replacement cycle in the UK is 8-10 years, and our research suggests that those aged over 55 are significantly less likely to have replaced their television in the last 5 years than those aged 25 – 34.¹ As accessibility requirements, and visual impairment in particular, often increase in likelihood with age, the native UI approach alone may unfairly disadvantage those that need it most.

Ongoing refinements will be made to the ATVG post launch to ensure the service remains fit-for-purpose and valuable to our viewers. As updates will also be immediately available to those with connected Freeview Play devices, this provides us with the flexibility to make incremental improvements where required.

3.3 Engaging Accessibility User Groups

We recognise the importance of engaging accessibility user groups in the design, development and launch of the ATVG, and the value in Ofcom's belief that determining the equivalent effectiveness of our solution should be led by users. With this in mind, we have engaged with a number of agencies and advocacy groups to both formally gather feedback on designs, and to build relationships prior to launch.

We have worked closely with Digital Accessibility Centre (DAC) during the design phase of the ATVG to gather initial user insight when developing the concept, and to undertake a formal design review. In this review DAC confirmed suitability for our target audience and provided specific feedback on the four features prioritised by Ofcom. Our later iterations of the design have been guided by this feedback, and we will continue to work with DAC when testing TTS implementation. We are also working closely with AbilityNet who will support us in formal user testing over the next 4-6 months.

We have also engaged with RNIB, Action for Hearing Loss and Age UK, to provide updates on our activity, and to offer a face to face meeting showcasing the work-in-progress app. This provided opportunities for us to gather further informal feedback, to get a better understanding

¹ Freeview Audience Tracker (January – September 2019, Base: 9000 online respondents)

of user need, and to build relationships with key contacts in these groups prior to launch and awareness activities.

The initial response to demos of the ATVG has been highly positive, and groups are excited to see this service launch. Going forward, we will continue to ensure engagement with user groups is at the forefront of our approach as development progresses.

3.4 ATVG Feature Detail

Our engagement with accessibility user groups has led to the identification of a number of features beneficial to users with accessibility requirements. However, for the purposes of this statement, we will provide a detailed outline of the four features specifically identified as a priority by Ofcom in their 2018 decision.

3.4.1 Magnification

The ATVG has been designed to display text content 2 times the size of normal text presentation; this can be up to 48pt font size on a normal 720p resolution TV. This feature is present as standard upon accessing the ATVG.

3.4.2 Text to Speech (TTS)

The ATVG TTS system will provide a human and contextual aural cue to the user. Rather than reading everything on screen as many TTS implementations are prone to do, it will read specific elements to aid the navigation and discovery of programmes consistently through the TV guide.

To allow for ease of first use for visually impaired users, TTS will be automatically set to 'On' when accessing the ATVG app, with those users who do not require TTS able to easily switch this feature off in the settings.

We recognise the need for thorough user testing for this feature in particular and will ensure this is a core part of the later development phases.

3.4.3 Highlighting and Filtering

The ability to filter content based on accessibility programme type has been at the forefront of the ATVG's design. On first use of the ATVG, the user will be able to set their accessibility preferences as per the welcome screen in Figure 1. The ATVG will remember these settings when returning to the application, and only show programming that meets the criteria selected by the user. This will be consistent across both the linear guide, and the additional Freeview Play On-Demand areas: "Recommended" and "Recent". Users will be able to easily access "Settings" to change these preferences at any time.

3.4.4 High Contrast Display

The ATVG has a simple UI which avoids elements with aesthetic value only, such as animations and image overlays. As per Ofcom guidelines, the ATVG has been developed with a 7:1 contrast ratio as a minimum, and in many areas this ratio has been increased following engagement and feedback from DAC during the design review stage.

Figure 1: ATVG Welcome Screen

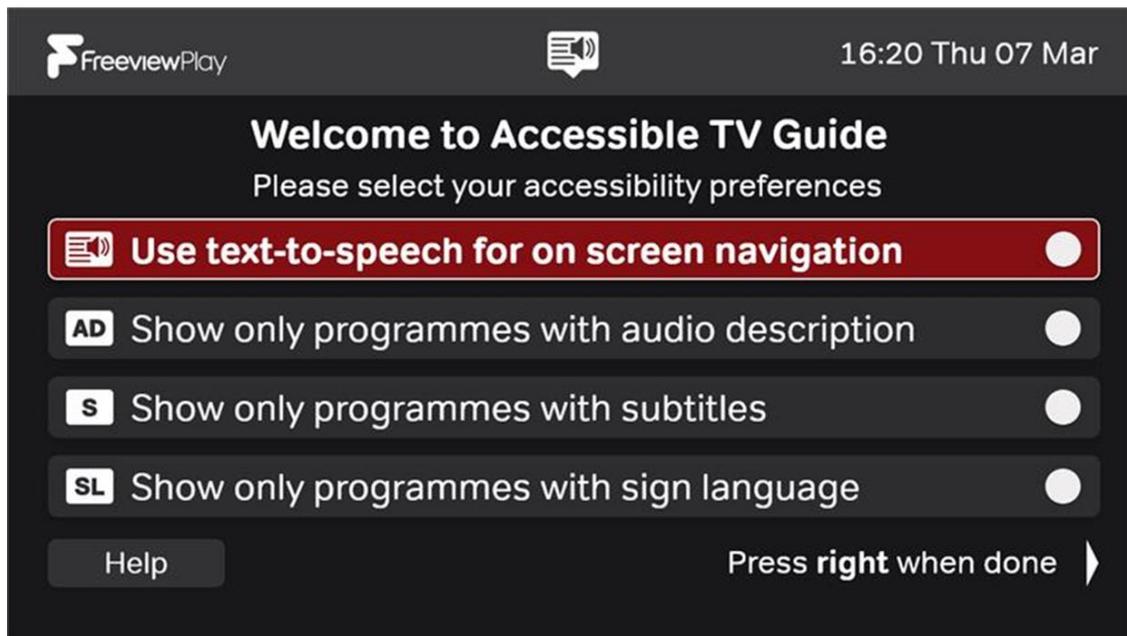


Figure 2: Linear TV Guide Area



3.5 Development Timelines & Launch Activity

Our estimated launch for the Accessibility TV Guide MVP is towards the end of Q2 2020. This will be following further user testing and engagement with user groups as outlined in section 4.3. The MVP release will focus on linear TV functionality only, with on demand released later in 2020.

Detailed launch activity will be planned in the 3 months preceding launch, but we are considering the following approaches to increase awareness in target user groups: hosting a launch event with partners and advocates for this user group; working closely with our accessibility user group partners to include information on their websites, blogs and social media; developing thought leadership pieces emphasizing the importance and relevance of the ATVG, and co-producing press releases with advocacy groups.

4. EPG Accessibility on FVP Devices

4.1 Changes to the Product Overview Document (POD)

Implementation of accessibility requirements in the native UI can maximise discoverability and reach of these features for viewers that use compatible devices.

We have added the four priority features identified by Ofcom to our Freeview Play Product Overview Document (POD) published in April 2019.² This document outlines all product requirements for 2020 Freeview Play device models and offers guidance on implementation.

We also advise manufacturers that users should be able to easily access these features using a remote control.

4.2 Manufacturer Compliance

As highlighted in our 2018 Accessibility Statement, a number of our manufacturing partners already deliver some of these features on existing Freeview Play device models.³ However, conformance varies across manufacturers and more could be done to both further the reach of TTS and high contrast UI features, and to address magnification and highlighting / filtering in particular.

As discussed in past accessibility submissions, it remains the case that our manufacturer partners own the native UIs of FVP devices meaning we cannot guarantee the implementation of these features, and thus the impact of the new POD requirements is likely to be limited.

We are in the process of engaging each manufacturer to understand the rationale for any non-compliance. These discussions are ongoing; however, the overarching rationale received so far is as follows:

- Manufacturers operate in a global market and regional specific changes are costly and difficult to implement

² [redacted]

³ [redacted]

- Magnification in particular, is difficult to implement in a way that is user friendly on grid style EPGs. Although Ofcom has indicated in its 2019 Annual Report on EPG Accessibility that this is a more commonly offered feature and should be prioritised, it is difficult for manufacturers to move beyond a basic zoom function without rebuilding the EPG in its entirety (a high cost and time intensive activity). A basic zoom function overlaid on existing EPGs is unlikely to provide significant benefit to the user due to poor usability.

4.3 DTG Engagement

Our 2018 statement raised the possibility of new accessibility specifications being included within the D-book, and we continue to believe that inclusion in the D-book is the best way to ensure adoption across all devices. This would ensure that all DTT receivers, including those that are not Freeview Play compliant, take reasonable steps to include the accessibility features outlined in Ofcom's report. This is important because there are some manufacturers which are not Freeview Play partners and without changes to the D-book there is no clear instrument to influence the provision of accessibility features on Samsung devices.

Whilst we are continuing to work within the DTG Accessibility Working Group to reflect new guidelines in the non-mandatory U-Book, as the D-book is primarily focused on interoperability between broadcasters and devices, accessibility features are considered by the DTG as out of scope of this.

5 Additional Commitments to Accessibility

5.1 Content Provider Engagement

We understand that success of the ATVG, and / or any other method of delivering the highlighting or filtering feature specifically, is dependent on accessible content being made available by content providers.

We are working closely with our content provider partners to raise awareness of this, and to identify the necessary steps forward to close any gaps in the provision of accessible content services and to ensure the best end to end experience for users. We will continue this dialogue throughout app development and launch.

5.2 Accessibility across all Customer Touchpoints

We aim to provide our viewers with accessible services across all Freeview customer touchpoints, regardless of how they choose to engage with us or watch TV.

- Our new website complies with W3C Web Content Accessibility Guidelines 2.1 (Level AA) and includes an online EPG which web users will be able to filter by accessibility programme type (subtitled, signed, audio described)

- The Freeview mobile app is fully compatible with Apple and Android in-built accessibility functionality including magnification, high contrast display and “dark mode” (iOS only); an alternative UI style recognised as a better experience for those with visual impairments. Freeview app specific icons and user experience are in-line with Apple accessibility guidelines, and the mobile TV guide can become a talking EPG if the user switches on iOS Voice Over or Android TalkBack.
- Our support services function across multiple channels depending on user preference or need: Freeview Advice line over the phone, webchat on the new website, and FAQs / how to videos for those who prefer to self-help. Our contact centre staff have received disability awareness training to better support those with accessibility requirements and will be fully trained on the ATVG prior to launch.

Additionally, as our linear TV guide is also available on mobile and web, the provision of accessibility features within these services means viewers have an alternative way of discovering content if unable to access features via their TV’s native UI.

6 Next Steps

We will continue to progress development and testing of the Accessible TV Guide application and publish the result of consultation on the use of channels 555 and 258 as access points. In parallel to this, we will also continue to engage with all partners within the horizontal market to increase accessibility services for Freeview viewers.

We welcome any request from Ofcom for further discussions of our accessibility activity, and / or a demonstration of the Accessible TV Guide application.