

Consultation response form

Please complete this form in full and return to mediaact.part2@ofcom.org.uk.

Consultation title	Consultation on our draft Code of Practice and draft Guidance on the Agreement Objectives
Full name	[REDACTED]
Contact phone number	[REDACTED]
Organisation name	Connected TV Marketing Association (CTVMA)
Email address	[REDACTED]

Confidentiality

We ask for your contact details along with your response so that we can engage with you on this consultation. For further information about how Ofcom handles your personal information and your corresponding rights, see [Ofcom's General Privacy Statement](#).

Your details: We will keep your contact number and email address confidential. Is there anything else you want to keep confidential? Delete as appropriate.	Nothing
Your response: Please indicate how much of your response you want to keep confidential. Delete as appropriate.	None
For confidential responses, can Ofcom publish a reference to the contents of your response?	Yes

Your response

Question	Your response
<p>Question 1: Do you agree with our approach to considering appropriate prominence and our analytical framework? Please provide your reasoning, and if possible, any supporting evidence.</p>	<p>Non-Confidential</p> <p>Yes, in principle. Ofcom’s approach recognises that prominence must be assessed by user journey and UI context (app menu, search, content rails, etc.) rather than via a single “one-size” rule, and it appropriately balances outcomes for PSBs with platform innovation and product design realities.</p> <p>Additional point from Australia: the most durable frameworks focus on measurable visibility outcomes, supported by transparent device-level reporting.</p> <p>CTVMA recommendation: add an implementation layer that enables independent, standardised transparency across designated platforms (e.g., a UK-adapted “home screen database / transparency register” concept) to reduce disputes, support monitoring, and avoid fragmented bilateral reporting.</p>
<p>Question 2: Do you agree with our proposals on app menus, and our assessment of their associated impacts? Please provide your reasoning, and if possible, any supporting evidence.</p>	<p>Non-Confidential</p> <p>Yes. The proposal that designated PSB players should be immediately visible and generally within the first nine tiles is clear, implementable, and user-meaningful.</p> <p>Impact view: This is a proportionate baseline that supports discoverability without prescribing identical UI layouts across brands.</p> <p>CTVMA recommendation: Ofcom should encourage consistent reporting of app-menu placement rules (default state vs personalised/reordered state) via a neutral disclosure format to reduce ambiguity and compliance friction.</p>
<p>Question 3: Do you agree with our proposals on primary content areas, and our assessment of their associated impacts? Please provide your reasoning, and if possible, any supporting evidence.</p>	<p>Non-Confidential</p> <p>Yes, with a practical clarification. Primary content areas are where influence is greatest (home rails, recommendations, “featured”, “continue watching”). A principles-based approach is appropriate, provided</p>

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	<p>Ofcom clarifies how “appropriate” works under personalisation and contextual relevance.</p> <p>CTVMA recommendation: incorporate transparent descriptors in compliance reporting (e.g., “prominence surfaces enabled”, “PSB rails present”, “frequency rules”, “personalisation logic categories”) so outcomes can be independently validated without disclosing proprietary algorithms.</p>
<p>Question 4: Do you agree with our proposals on search, and our assessment of their associated impacts? Please provide your reasoning, and if possible, any supporting evidence.</p>	<p>Non-Confidential</p> <p>Yes. The proposal that when public service content is most relevant to a search, it should be the most prominent result is a high-value rule that aligns with real user behaviour.</p> <p>CTVMA recommendation: encourage minimum transparency on search treatment (e.g., “when relevant” signals, metadata quality expectations, and how PSB results are labelled) so platforms and PSBs can fix data/metadata issues quickly.</p>
<p>Question 5: Do you agree with our proposals on listed channels, and our assessment of their associated impacts? Please provide your reasoning, and if possible, any supporting evidence.</p>	<p>Non-Confidential</p> <p>Yes, subject to consistent definitions and scope. The duty explicitly includes listed channels within designated services.</p> <p>Impact view: The key implementation risk is inconsistency in how “listed channels” are represented across devices (live tiles vs FAST rails vs hub entry points).</p> <p>CTVMA recommendation: establish a standardised reporting schema for listed-channel availability and placement so compliance is auditable across different UI implementations.</p>
<p>Question 6: Do you agree with our proposals on attribution, and our assessment of their associated impacts? Please provide your reasoning, and if possible, any supporting evidence.</p>	<p>Non-Confidential</p> <p>Yes. Clear attribution to the relevant PSB player improves trust and reduces mis-routing. Ofcom’s proposal that public service content should be clearly attributed is sound.</p>

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	Implementation note: attribution should be applied consistently across rails, search, voice results, and deep links.
<p>Question 7: Do you agree with our proposal on alternatives to visual information, and our assessment of its associated impacts? Please provide your reasoning, and if possible, any supporting evidence.</p>	<p>Non-Confidential</p> <p>Yes. Voice guidance / text-to-speech as an alternative to visual information is a practical baseline.</p> <p>Recommendation: Ofcom should encourage interoperability expectations (where feasible) so accessibility is not fragmented across device brands and OS layers.</p>
<p>Question 8: Do you agree with our proposal on text and image enlargement, and our assessment of its associated impacts? Please provide your reasoning, and if possible, any supporting evidence.</p>	<p>Non-Confidential</p> <p>Yes. Magnification/zoom functionality is a reasonable and widely understood requirement that supports navigation and content discovery.</p> <p>Implementation note: to be effective, this must work on the navigation UI, not only within content playback.</p>
<p>Question 9: Do you agree with our proposal on distinguishable text and images, and our assessment of its associated impacts? Please provide your reasoning, and if possible, any supporting evidence.</p>	<p>Non-Confidential</p> <p>Yes. This should be treated as a usability baseline for connected TV and aligns with modern UI accessibility practice.</p> <p>Recommendation: Ofcom may wish to link “distinguishable” to measurable heuristics (contrast ranges, minimum font sizing, focus states) while still allowing brand expression.</p>
<p>Question 10: Do you agree with our proposal on information on accessibility features, and our assessment of its associated impacts? Please provide your reasoning, and if possible, any supporting evidence.</p>	<p>Non-Confidential</p> <p>Yes. Labelling content with subtitles / audio description / signing is a tangible consumer benefit.</p> <p>Recommendation: Ofcom should encourage consistent metadata standards so labels are reliable across PSB and platform inventories.</p>

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<p>Question 11: Do you agree with our proposal on labelling of accessible content, and our assessment of its associated impacts? Please provide your reasoning, and if possible, any supporting evidence.</p>	<p>Non-Confidential</p> <p>Yes. Labelling content with subtitles / audio description / signing is a tangible consumer benefit.</p> <p>Recommendation: Ofcom should encourage consistent metadata standards so labels are reliable across PSB and platform inventories.</p>
<p>Question 12: Do you agree with our proposal on enabling use of the available accessibility features, and our assessment of its associated impacts? Please provide your reasoning, and if possible, any supporting evidence.</p>	<p>Non-Confidential</p> <p>Yes, and this is critical. “Informed about” is not enough—users must be able to activate and use features in practice. The accessibility duty emphasises practical ability to use the service.</p> <p>Recommendation: build in simple “test and confirm” steps (e.g., voice guidance check, subtitle enablement confirmation).</p>
<p>Question 13: Do you have any views or evidence on the effectiveness or impact of any other actions in relation to making use of the RTSS and finding/making use of accessible programming? Please provide your reasoning, and if possible, any supporting evidence.</p>	<p>Non-Confidential</p> <p>Yes—there are additional high-impact actions Ofcom could encourage, including:</p> <ul style="list-style-type: none"> ● consistent accessibility shortcuts (quick toggles for subtitles/AD/signing); ● “accessible content” filters integrated into browse and search; and ● a standardised device-level disclosure of accessibility capabilities to reduce consumer confusion. (These align with the types of accessibility features explored in Ofcom’s research framing.)
<p>Question 14: Do you agree with our proposed draft Guidance, and our assessment of its associated impacts? Please provide your reasoning and, where relevant, any supporting evidence.</p>	<p>Non-Confidential</p> <p>Yes. We support Ofcom issuing guidance that helps PSBs and platform providers meet “must-offer/ must-include” regime while acting consistently with the Agreement Objectives.</p>

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	<p>Key point: Guidance should reduce negotiation friction, avoid distorted bargaining power outcomes, and keep focus on visibility outcomes and consumer experience.</p> <p>CTVMA recommendation: encourage “minimum transparency terms” in agreements (e.g., reporting cadence, metadata responsibilities, change-control notice) to reduce disputes and accelerate remediation.</p>
<p>Question 15: Do you agree with the assessment of the combined impact of our proposals when considered as a package? Please provide any relevant evidence that supports your position.</p>	<p>Non-Confidential</p> <p>Yes, broadly. Considered as a package, Ofcom’s proposals are coherent: they target the principal discovery surfaces (app menu, search, content areas), require attribution, and improve accessibility, while leaving room for innovation and differentiated UI.</p> <p>Implementation caution: cumulative compliance burden can rise if every OEM implements bespoke reporting. A neutral transparency format can reduce total cost and increase consistency.</p>
<p>Question 16: Do you agree that 12 months is a reasonable period for all providers to bring themselves into compliance? Please provide your reasoning, and if possible, any supporting evidence.</p>	<p>Non-Confidential</p> <p>Yes, for baseline compliance—provided Ofcom supports a phased approach for complex UI/OS update cycles and recognises hardware refresh and firmware deployment realities. Ofcom is proposing 12 months as the compliance period.</p> <p>Practical approach:</p> <ul style="list-style-type: none"> ● Phase 1 (0–6 months): app menu placement + attribution + basic search treatment + baseline accessibility features. ● Phase 2 (6–12 months): deeper integration across primary content areas, accessibility labelling consistency, and formalised reporting. <p>CTVMA recommendation: adopt a lightweight “disclose and improve” approach early (with transparent reporting), then tighten outcome assurance over time.</p>

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