

# Consultation response form

## Everyone TV Response

Question	Your response
<p><b>Question 1:</b> 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><b>Question 2:</b> Do you agree with our proposals on <b>app menus</b>, and our assessment of their associated impacts? Please provide your reasoning, and if possible, any supporting evidence.</p>	<p>Confidential? – N</p> <p><b>We broadly agree with the app menu proposals, however we believe more can be done to future-proof them and close potential loopholes.</b></p> <p><i>i).</i></p> <p>We foresee a likely scenario where RTSS providers <b>prompt</b> users to rearrange apps to an order the provider suggests or to accept an entirely rearranged homepage, either based on viewing behaviour or immediately after set-up, and would like to see this explicitly addressed.</p> <p>Whilst Ofcom should not prevent RTSS providers from providing viewers with the functionality to change the order themselves, such prompted changes would undermine the aims of the prominence regime.</p> <p>Additionally, some RTSS providers are already automatically rearranging app menus, <b>unprompted</b>, based on viewing behaviour. Whilst it could be argued that this is in the viewer interest, we believe that it results in a feedback loop whereby those viewers who engage less with PSB content never see the apps thus undermining the aims of the prominence regime. Other common UI features, such as ‘continue watching’ rails, should be sufficient to fulfil a similar function and meet viewer needs</p>

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	<p>and therefore Ofcom should clarify that such automatic app re-arrangement is not permissible. If Ofcom are minded to allow automatic rearrangement of apps we believe that there should be a requirement that DIPS apps remain always visible within app menus.</p> <p><i>ii).</i></p> <p>We also note that Ofcom state: <i>“There is a risk that the effectiveness of our proposal could be reduced if RTSS providers make significant changes to their UI, for example if they decide to remove the app menu from the homepage, or make this feature smaller in size or less prominent. However, we consider that RTSS providers are unlikely in practice to be incentivised to do this.”</i> This fails to address the fact that incentives change and so, to future-proof app prominence, it should be the rules are robust enough to prevent later monetisation-driven changes that may undermine them.</p> <p><b>[Redacted]</b></p> <p>We propose two further, clarifying requirements to mitigate the negative impact of UI changes on PSB prominence and maintain the effectiveness of current proposals:</p> <ol style="list-style-type: none"> <li>1. That there must always be visible access to the apps (e.g. when the TV is turned on), or an app menu above the homepage fold. <ol style="list-style-type: none"> <li>a. This would be satisfied by the current app menu proposals if there is a rail above the fold, but would not necessitate having an app rail; allowing for innovation and differentiation whilst ensuring the prominence aims are achieved.</li> </ol> </li> <li>2. Introducing prominence requirements for TV remotes. <ol style="list-style-type: none"> <li>a. As identified in 2CV’s Ofcom-commissioned report the remote is a key component of user journeys and we would urge Ofcom to consider how legislation can be used to extend prominence to TV remotes to mitigate the impact UI changes will have on the app menu proposals.<sup>1</sup> We have provided details on how TV remotes could be regulated in our response to Ofcom’s recent call for input into Broadcast Regulation.</li> </ol> </li> </ol>

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<sup>1</sup> 2CV, Exploring audience journeys on connected TV devices, 2026

Question	Your response
<p><b>Question 3:</b> Do you agree with our proposals on <b>primary content areas</b>, and our assessment of their associated impacts? Please provide your reasoning, and if possible, any supporting evidence.</p>	<p>Confidential? – N</p> <p><b>We agree in principle with the primary content area proposals, including the level of appropriate prominence, but believe that further clarification would be useful.</b></p> <p><i>i).</i></p> <p>We agree that the definition of primary content areas should exclude ‘continue watching’ and ‘my list’ type rows. However, we believe it should include all promotional areas (i.e. features like screensavers and smaller secondary banners) and not just the ‘primary promotional area’. If not, RTSS providers may choose to increase the prominence of screensavers and ‘smaller secondary banners’ (or indeed introduce these as new features) to circumvent the spirit of the regulations.</p> <p>In addition, we do not believe that primary content areas need a specific spatial definition or cut-off point (e.g. anything below the 6<sup>th</sup> rail deemed to be a secondary rail), but instead can encompass the entire homepage if a suitable definition of prominence and its measurement can be agreed (which would prevent RTSS providers only giving prominence in less used parts of the homepage). This would in effect simplify the definition to all content areas.</p> <p><i>ii).</i></p> <p>Ofcom currently define prominence <i>“in terms of following factors (taken together): the number of programmes presented in the primary content areas; the length of time for which they are presented; their positions; the times of day they are presented; the manner of presentation (e.g. size of content tiles); and any other factor which is relevant to giving prominence.”</i> This can be summed up as the impressions delivered and their value (an impression on the ‘premium’ hero banner is worth more than one delivered in a disaggregated content rail) – i.e. an equivalent advertising value.</p> <p>We believe that defining prominence in terms of the equivalent advertising value delivered or such metric, will allow for easy internal monitoring by RTSS providers as well as facilitating simple cross-RTSS monitoring for Ofcom. This would ensure all parties have a common view on what is necessary for compliance and allowing RTSS providers to innovate their UIs with full understanding of the prominence implications.</p> <p>In Annex 4 of the Consultation Ofcom discuss a Media Placement Value (MPV) metric which appears to fulfil this purpose</p>

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	<p>and may be the most practical way of monitoring compliance.<sup>2</sup> Otherwise, Ofcom may need to develop their model of UI advertising value. We believe with industry input on share of impacts by UI region and typical CPMs this should be a relatively simple exercise. Alternative methods for defining/ tracking prominence such as click-throughs and eye-tracking fail to fully encapsulate all the necessary elements.</p> <p>Such a methodology need not be a burden on RTSS providers who would remain free to track prominence on their UI however is most convenient to them, but understanding the uniform way in which Ofcom will be considering prominence and how their own metrics relate to that will be key for planning.</p> <p><u>iii).</u></p> <p>In addition to simplifying the definition to a single metric we believe some additional stipulations are required:</p> <ul style="list-style-type: none"> <li>• Minimum prominence should apply to each individual device (and providers should not be able to, for example, average prominence across multiple linked devices).</li> <li>• RTSS providers should have to maintain minimum prominence above the fold (i.e. on the homepage before any scrolling); this should close any unintended loopholes in the proposals.</li> <li>• RTSS providers should have to maintain minimum prominence across the day and not only give PSBs prominence in off-peak times. Factoring in peak vs off-peak CPMs to prominence monitoring could remove the need for this, but we believe that is an unnecessary additional layer of complexity. A rule that minimum prominence must always be met will simplify the regime and ensure it is effective in delivering its policy aims – ensuring a variety of content, including public service content (PSC), is prominent in all day parts will benefit viewers. <ul style="list-style-type: none"> <li>○ This would still allow RTSS providers to give different degrees of prominence across different parts of the UI and to vary this throughout the day, but the sum of prominence should always meet the minimum requirement at any time of day.</li> <li>○ Compliance would be easier to monitor (for both providers and Ofcom) as single UI ‘snapshots’ could</li> </ul> </li> </ul>

<sup>2</sup> Although we note that this MPV approach only takes into account ‘cold starts’ so additional checks may be needed to ensure compliance of providers once viewer history is taken into account. We would also welcome more detail on the relative difference in MPV score as content moves down the page as the majority of value is captured by the first two or three rails, and it is important that any prominence metric reflects this.

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	<p>be analysed – although such snapshots should be regularly monitored (and with factors such as time of day and viewer history altered for each snapshot).</p> <ul style="list-style-type: none"> <li>○ Barb have found that user journeys on TVs vary throughout the day and “<i>each channel or service type has strengths at different times of the day. The biggest TV channels are most likely to be the first choice at switch-on in the mornings before work. Then in the evening, the hours 5pm-10pm see those channels battle for that switch-on moment in classic peaktime against Netflix, Amazon and Disney. Post-11pm into the early hours of the morning sees the main TV channels give ground to the streamers</i>”.<sup>3</sup> Thus it is important RTSS providers cannot selectively benefit streaming content over PSC during the key peaktime battle.</li> <li>● RTSS providers should have to vary the specific PSB content given prominence to a reasonable degree. This would ensure viewers are presented with a variety of PSC and not just the few shows they may be currently watching (which would also be present in ‘continue watching’ areas)</li> </ul> <p><u>iv).</u></p> <p>Even with the simplifications we suggest we still anticipate RTSS providers having a degree of uncertainty over what constitutes minimum compliance. Therefore, we think it would be useful for Ofcom to provide examples of what minimum compliance could look like. We would welcome working with Ofcom and other RTSS providers to help develop these examples.</p> <p>We envisage such examples could take the format of a cartoon homepage showing promotional and disaggregated content areas (above and below the fold). Ofcom could then suggest some combination of percentages which are likely to satisfy requirements – e.g. 25% timeshare of the hero banner, 75% share of the first disaggregated content rail, 0% of the second disaggregated content rail, and 100% of the third disaggregated content rail. Whilst all UIs are different we believe this would still bring much needed clarity.</p>

<sup>3</sup> Barb, *What People Watched in 2025*

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	<p><u>v).</u></p> <p>Finally, we are also aware of instances where clicking PSC can direct viewers to DIPS hosted within other apps rather than the standalone DIPS app (e.g. the ITVX section of Amazon Prime Video).<sup>4</sup> As more content providers make their content available across a range of different apps this issue is likely to grow. The guidance around PSC being easily accessible in disaggregated content areas should explicitly make clear that PSC should direct back to its provider’s own app. Note that this should not necessarily apply to live content which should be able to direct to an EPG if it is available there.</p>
<p><b>Question 4:</b> Do you agree with our proposals on <b>search</b>, and our assessment of their associated impacts? Please provide your reasoning, and if possible, any supporting evidence.</p>	<p>Confidential? – N</p> <p><b>We broadly agree with the search proposals, however we believe that the recommendation for equal prominence when PSC is equally relevant to non-PSC should be strengthened. We also believe that the proposals do not adequately account for situations where the same content can be found in multiple services.</b></p> <p><u>i).</u></p> <p>When two pieces of PSC and non-PSC are equally relevant it is likely RTSS providers are incentivised to show non-PSC as the first result (they may have a revenue share agreement with the content provider or able to secure a fee for promotion) arguing PSC as the second result equates to comparable prominence. However, if users are not searching for a specific piece of content they are far more likely to click on the first result, so this cannot be the case and ‘equal prominence’ cannot exist in practice. This problem is most apparent for UIs where the first and second results are presented differently (e.g. first result is a large, highlighted tile and all other results are smaller, un-highlighted tiles). Even if a viewer subscribed to the non-PSC provider it is in the viewer’s interest to know where they can access equally relevant content for free. <b>We therefore believe it makes sense for the rules to state that PSC should be more prominent in such ‘equally relevant’ instances.</b></p> <p><u>ii).</u></p> <p>Another concern is that the same piece of PSC can often be found on multiple services (with non-DIPS services potentially</p>

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<sup>4</sup> [Redacted]

Question	Your response
	<p>requiring a subscription to access) and the proposals do not address prominence in such, important and often occurring, instances. When it is the exact same content we believe guidance should make it clear that greater prominence should be given to the content on the DIPS. However, it may be the case that differing availability of episodes / series may makes the non-DIPS content the more relevant result – in which case it would be acceptable to surface this content first.</p> <p>This rule should apply no matter if the viewer subscribes to the non-DIPS or not. If the content is on a non-DIPS which the viewer subscribes to then it may be the case that the viewer would rather watch it on this service as it is without an additional subscription.</p> <p><i>iii).</i></p> <p>As with our response to the primary content area proposals, we believe it should be explicitly stated that PSC in search results must direct users to the standalone DIPS apps rather than DIPS included in other services (with the exception of when search results return live content).</p>
<p><b>Question 5:</b> Do you agree with our proposals on <b>listed channels</b>, and our assessment of their associated impacts? Please provide your reasoning, and if possible, any supporting evidence.</p>	<p>Confidential? – N</p> <p><b>We support ensuring that the listed channels receive appropriate prominence and agree with the overall intent of Ofcom’s proposals. However, the proposals in their current form lack clarity and are likely to create issues for both RTSS providers and viewers. Live TV areas that include unlicensed channels (i.e., unregulated EPGs) should not be required to carry the listed channels and Ofcom should instead consider an alternative approach that secures prominence for the listed channels whilst protecting still protecting viewers.</b></p> <p>Everyone TV’s mission is to champion free TV, ensuring British content made for British audiences remains easily accessible and discoverable. This has sat at the heart of Freeview and Freesat, and was the key reason we launched Freely – ensuring audiences can continue to access live TV channels in a familiar and safe environment without the need for a dish or aerial.</p> <p>Live linear broadcast TV, delivered through regulated EPGs and featuring Ofcom licenced channels, remains the primary way audiences watch TV and is at the core of the UK PSBs’ offering. In addition to this, a minority of live viewing also goes to unlicensed free ad-supported streaming (FAST) channels and</p>

Question	Your response
	<p>guides.<sup>5</sup> Under these proposals, Ofcom group both of these under a broad definition of ‘live’ and suggest newer, FAST-based guides would have to follow the listed channel rules.</p> <p>As we explain in our answer, there are a number of issues with conflating these two forms of live: they are regulated differently, audiences have different expectations around them, and the incentives of RTSS providers in promoting them also differ (i.e. FAST channels can be actively monetised). Mandating that the listed channels must appear next to unlicensed channels will give viewers the impression that these two forms of live are equivalent when the standards, content, and regulatory safety rigour are not. These issues could be avoided through a different definition of live TV or through mechanisms such as excluding live TV areas which feature unlicensed channels.</p> <p>In addition, we believe further consideration needs to be given on how the RTSS Code will interact with the EPG Code – especially as DCMS have recently laid out their intention to review the framework that governs EPGs.<sup>6</sup></p> <p>We would welcome further dialogue with Ofcom and industry stakeholders to work out how prominence for the listed channels can be achieved in a manner that best serves viewers.</p> <p><i>i).</i></p> <p><b>We would like clarity on the exact definition of a ‘live TV area’ and how the Regulated EPG exclusions will apply. Going forwards, we would also welcome the RTSS Code and the EPG Code aligning more closely.</b></p> <p>Ofcom state that live TV areas are those that provide “access to linear channels, typically either in the form of a TV guide providing a list of channels, or an ‘on now’ row” and that “some TSS have multiple live TV areas, for example both an ‘on now’ row on the homepage, as well as a more traditional grid-based TV guide”. Ofcom also note that “there can be multiple TV guides on the same TSS that list different sets of channels, for example platform-specific selections of Free Ad-Supported Streaming Television (FAST) channels such as those offered on Samsung TV Plus and LG Channels, in addition to the ‘traditional’ suite of TV channels.”</p>

<sup>5</sup> Barb does not report on FAST viewing, but according to Ofcom’s latest Communications Market Report data the reach of Samsung TV Plus, for example, is 4% compared to 83% for the PSBs’ online video services.

<sup>6</sup> DCMS, Government statement on the future regulation of television electronic programme guides, 2026

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	<p>Our interpretation of this definition is that each different guide area on a TSS is a different live TV area (and hence FAST guides are in scope) and that different ‘on now’ rails on the homepage (e.g. one which directs to a more ‘traditional’ EPG or into BVOD apps and one which directs to a FAST guide) constitute different live TV areas – rather than the whole homepage constituting one live TV area. This understanding informs the rest of our response to Question 5. <b>However, we do not think this is clear and alternative interpretations may be possible – we would therefore welcome a more explicit definition.</b></p> <p>Greater clarity on how the regulated EPG exclusions will apply would also be welcome. Freely is soon to become a regulated EPG and it is not currently clear whether an ‘on now’ rail on the homepage of a Freely partner would count as a regulated EPG. Channels from guide areas (both ‘traditional’ and FAST) typically feed directly into ‘on now’ areas in the homepage and if the feeding guide is a regulated EPG but the ‘on now’ rail is not then the channel ordering requirements will be different between the two areas; this will cause technical difficulties and viewer confusion. An alternative issue could arise if such ‘on now’ rails are considered regulated EPGs and the entire homepage is considered a single live TV area – under this scenario it is not clear how the exclusion for regulated EPGs would work and if the whole homepage is excluded there would be nothing to prevent RTSS providers giving FAST channels more prominence than the listed channels.</p> <p>It may be the case that the Code needs to make some exceptions to the listed channel ordering for live TV areas which are ‘fed’ by and dependent on a regulated EPG.</p> <p>We would also appreciate any additional information from Ofcom on how they envisage the RTSS Code and EPG Code interacting under different scenarios that may arise from DCMS’s review of Regulated EPGs. It may be the case that newer FAST guides become regulated to some extent but are not obliged to give prominence to the listed channels – in which case excluding all Regulated EPGs from the RTSS Code may become problematic.</p> <p>Overall, we believe that aligning the listed channel requirements with the EPG Code is a sensible approach and understand the need for small deviations between the two. However, going forwards we think the best outcome for RTSS providers and audiences would be for the RTSS listed channel ordering proposals to match the EPG Code (whether this means</p>

Question	Your response
	<p>changing the proposals or updating the EPG Code). This would prevent some of the issues outlined above and would ensure a more uniform linear experience between different platforms. Such a uniform experience is important to support less digitally skilled viewers as they move from platforms like Freeview which are regulated by the EPG code, to platforms which are currently not.</p> <p><u>ii).</u></p> <p><b>A different definition of live TV areas or other mechanisms for ensuring that the listed channels do not appear in live TV areas with unlicensed channels would protect viewers, avoid confusion, and allow for RTSS differentiation.</b></p> <p>The proposals currently mandate that all live TV areas (including FAST areas but excepting regulated EPG) must comply with the rules. However, we believe this will result in a number of issues:</p> <ul style="list-style-type: none"> <li>• The listed channels will presented next to unlicensed FAST channels; both in unregulated EPGs and in ‘on now’ / live rails. DCMS have recognised the harms that can arise from audiences interacting with unregulated EPGs, including programming unsuitable for younger audiences being shown before the watershed, and exposure to channels which have no protections around duly accurate and impartial news and hate speech.<sup>7</sup> Directing viewers to these areas by placing the listed channels within them will increase the likelihood of harm and will lend credibility to unlicensed news sources / undermine the credibility of licensed channels. <ul style="list-style-type: none"> <li>○ This is an issue for all the listed channels but will be especially severe for those which do not have specified positions and therefore may be surrounded entirely by unlicensed channels (e.g. BBC News).</li> <li>○ This may also impact the perception of how brand safe the listed channels are, with an impact on advertising revenue.</li> </ul> </li> <li>• For RTSS where there are multiple guides this will be confusing for viewers as they may be unaware if they are in a ‘traditional’ or non-traditional guide. <ul style="list-style-type: none"> <li>○ RTSS providers may also choose to direct ‘1’ on the remote to BBC 1 on the non-traditional guide,</li> </ul> </li> </ul>

<sup>7</sup> DCMS, Government statement on the future regulation of television electronic programme guides, 2026

Question	Your response
	<p>which would again cause confusion (especially amongst less digitally skilled viewers).</p> <ul style="list-style-type: none"> <li>○ It may also hinder PSBs' abilities to fulfil their re-mits as some viewing will be directed away from their portfolio channels in traditional guides. This is a wider issue which could also undermine the business models of commercial FTA broadcasters in the UK.</li> <li>● It will hamper the ability of RTSS providers to innovate and differentiate around FAST; the implication of the proposals is that FAST guides will essentially have to mirror traditional ones for the first page (given guides typically range in three to eight channel slots per page, as identified by Ofcom in the proposals) and FAST 'on now' rails would have to would have all or most immediately visible slots filled by listed channels.<sup>8</sup> <ul style="list-style-type: none"> <li>○ This is based on our understanding of different 'on now' rails on the homepage as different live TV areas.</li> </ul> </li> </ul> <p><b>Therefore, we believe that the definition of a live TV area should change or else TV areas featuring unlicensed channels should not be in scope</b> (on the latter point, this should not mean that the whole homepage should be excluded if it contains unlicensed channels, only those specific areas featuring those channels).</p> <p>If there are ever instances where some live TV areas must comply and others need not, then the areas which contain the listed channels should always be more prominent than any other live areas. The live areas which comply should also be the 'primary' ones and actions such as pressing the guide / live button on a remote, pressing numbered buttons on remotes, and searching for live should direct to these by default.</p> <p>The RTSS Code will provide some viewer protection similar to the EPG Code (e.g. accessibility requirements) but does not address the issue of unlicensed channels. As part of DCMS's review of Regulated EPGs, the licencing framework for newer IP-only / FAST channels will likely be examined and if the FAST channels on a service become regulated / licenced in some way then live areas featuring them would no longer need to be excluded (and these areas would then have to give prominence to the listed channels even if they are regulated differently to</p>

<sup>8</sup> We would like to note that we do not believe prominence itself hampers innovation, just specific unintended consequences such as this.

Question	Your response
	<p>the current Regulated EPGs). We therefore believe updates to the Code in line with the principles we have laid out here would be flexible enough to accommodate a range of potential regulated EPG / channel licencing frameworks.</p> <p>However, one issue which may arise from future changes to the EPG / channel licencing framework is that there are likely to be multiple guides featuring licenced channels on the same UI (e.g. if there is a 'traditional' guide and a FAST guide with licenced FAST channels). In such cases the viewer confusion and lack of differentiation issues outlined earlier will still occur – therefore we think that the code should clarify only one guide area need comply where there are multiple eligible for listed channel inclusion.</p> <p><u>iii).</u></p> <p><b>Ofcom should consider overall prominence requirements for Regulated EPGs.</b></p> <p>Everyone TV strongly believes viewers expect to be able to discover and browse the live channels from the PSBs and other licensed UK FTA broadcasters, in safe, simple and consistent experience. Supporting this outcome is at the heart of Freeview, Freesat, and Freely. Linear continues to be the primary way audiences want to watch TV; in December 2025 45% of TV set viewing was still to live,<sup>9</sup> the PSBs in particular derive the overwhelming majority of their viewing from linear,<sup>10</sup> and for many viewers the top linear channels remain the first content they seek out when they first turn on their TV set.<sup>11</sup> The consultation recognises the importance of the PSBs' live offering, noting: <i>“the main PSB channels are the foundation of the United Kingdom’s PSB provision, providing high-quality programmes across a range of genres and delivering societal and individual benefits.”</i></p> <p>However, no prominence is afforded to live areas (the definition of which we believe should not include FAST / unlicensed channels) themselves and Ofcom explain the <i>“proposed approach would enable audiences easily to discover and find the listed channels ... We consider that our proposals for live TV areas would be effective in securing appropriate prominence for the listed channels while affording sufficient flexibility to RTSS</i></p>

<sup>9</sup> Barb, *What People Watched in 2025*

<sup>10</sup> 78% of BBC viewing in 2024 was to linear (live + recorded) and this % is higher for the other national PSBs. Ofcom, *Media Nations 2025*

<sup>11</sup> 37% for all viewers 4+ and rising to 51% for viewers 55+. Barb, *What People Watched in 2025*

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	<p><i>providers in how they follow our recommendation. In particular, providers would maintain discretion to choose where any live TV areas are presented and how they function, leaving scope for innovation and differentiation between RTSS.”</i></p> <p>We disagree and believe that the current proposals do not go far enough to achieve Ofcom’s aims of ensuring audiences can easily discover and access the listed channels and without guardrails (including on TV remotes) there is a risk of detriment to the PSBs, vulnerable viewers, and broader UK TV ecosystem.</p> <p><b>It should not be assumed that all RTSS providers are incentivised to make live TV prominent for the benefit of viewers.</b> The commercial incentives in the Connected TV value chain drive providers to better monetise their UIs meaning decreasing linear provision even below their current levels. Many RTSS providers have sought to direct viewers to their own (monetisable) FAST channels instead of the listed channels and - although the Code will alleviate the impact somewhat - it is indicative of the behaviour to be expected once the listed channel rules must be followed.</p> <p><b>[Redacted].</b></p> <p>Our own data shows that the position of the ‘live’/‘on now’ rail on the RTSS homepage has a huge impact on viewer behaviour; <b>[redacted]</b>. Mandating that live TV (where delivered by a regulated EPG or similar viewer safe environment) must be above the fold on RTSS homepages could be the single most effective tool available to support the UK TV ecosystem as viewing becomes ever more IP-only based.</p> <p>We appreciate that mandating overall prominence may not be within Ofcom’s current powers, but we believe it should be a consideration for Ofcom as part of the wider review of broadcast regulation currently taking place.</p> <p><u><i>iv).</i></u></p> <p>If the Code can be updated to accommodate the principles we have laid out here then we believe it will ensure prominence is secured for the most important part of the PSBs offering, whilst providing some uniformity and protection which will be essential to support vulnerable audiences when all TV in the UK is delivered over IP. At the same time these principles would also allow RTSS providers to innovate in in the design of their homepages and differentiate their own FAST guides.</p>

Question	Your response
	<p>In addition to the above, we also believe that Ofcom must regulate TV remotes to ensure the listed channels remain easily discoverable and prominent. Again, our response to Ofcom's recent call for input into Broadcast Regulation provides more details on our views in this area.</p>
<p><b>Question 6:</b> Do you agree with our proposals on <b>attribution</b>, and our assessment of their associated impacts? Please provide your reasoning, and if possible, any supporting evidence.</p>	<p>Confidential? – N</p> <p><b>We agree.</b></p>
<p><b>Question 7:</b> Do you agree with our proposal on <b>alternatives to visual information</b>, and our assessment of its associated impacts? Please provide your reasoning, and if possible, any supporting evidence.</p>	<p>Confidential? – N</p> <p><b>We agree.</b></p>
<p><b>Question 8:</b> Do you agree with our proposal on <b>text and image enlargement</b>, and our assessment of its associated impacts? Please provide your reasoning, and if possible, any supporting evidence.</p>	<p>Confidential? – N</p> <p><b>We agree.</b></p>
<p><b>Question 9:</b> Do you agree with our proposal on <b>distinguishable text and images</b>, and our assessment of its associated impacts? Please provide your reasoning, and if possible, any supporting evidence.</p>	<p>Confidential? – N</p> <p><b>We agree.</b></p>
<p><b>Question 10:</b> Do you agree with our proposal on <b>information on accessibility features</b>, and our assessment of its associated im-</p>	<p>Confidential? – N</p> <p><b>We agree.</b></p>

Question	Your response
<p>pacts? Please provide your reasoning, and if possible, any supporting evidence.</p>	
<p><b>Question 11:</b> Do you agree with our proposal on <b>labelling of accessible content</b>, and our assessment of its associated impacts? Please provide your reasoning, and if possible, any supporting evidence.</p>	<p>Confidential? – N</p> <p><b>We agree.</b></p>
<p><b>Question 12:</b> Do you agree with our proposal on <b>enabling use of the available accessibility features</b>, and our assessment of its associated impacts? Please provide your reasoning, and if possible, any supporting evidence.</p>	<p>Confidential? – N</p> <p><b>We agree.</b></p>
<p><b>Question 13:</b> 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>Confidential? – N</p> <p><b>N/A</b></p>
<p><b>Question 14:</b> Do you agree with our proposed draft <b>Guidance</b>, and our assessment of its associated impacts? Please provide your reasoning and, where relevant, any supporting evidence.</p>	<p>Confidential? – N</p>
<p><b>Question 15:</b> Do you agree with the assessment of the <b>combined impact of our proposals</b> when considered as a package?</p>	<p>Confidential? – Y <b>[Redacted]</b></p>

Question	Your response
Please provide any relevant evidence that supports your position.	
<b>Question 16:</b> 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.	Confidential? – Y [Redacted]