

Organisation:

techUK

Additional comments:

Introduction

techUK represents the companies and technologies that are defining today the world that we will live in tomorrow. More than 880 companies are members of techUK. Collectively our members employ more than 700,000 people, which represents nearly half of all ICT sector jobs in the UK. These companies range from leading FTSE 100 companies to new innovative start-ups. The majority of techUK's members are small and medium sized businesses.

This response is made on behalf of techUK's device manufacturing members. We do not seek to fully represent the views of other members but where those views have been expressed they have been included.

Summary

techUK welcomes this review and, in addition to providing you with our recommendations and comments, would like to have the opportunity of joint discussions as part of the overall review and future EPG guide specification setting process.

Device Manufacturers regard usability and accessibility for all users groups of key importance when considering product design and specification. The constant evolution of product design and usability has delivered many usability and accessibility features that have helped users in the operation of their consumer electronic devices. The consideration of user groups with visual impairments has always been an important consideration and device manufacturers can demonstrate a path of constant product development to aid the usage of electronic devices by visually impaired user groups.

As the Ofcom consultation reports, there are products in the marketplace today that include feature sets that support usability by visually impaired users. Current accessibility features include speaking EPGs, High Contrast displays and Text magnification options. However, the Ofcom report makes reference to the fact that there are some manufacturers' sets on the market place (Samsung and Panasonic) that currently support the four proposed future mandated feature sets of Speaking EPGs, High Contrast Displays, Text Magnification and Filter by Access service (Figure 1, Page 10). Our information, as supplied by these manufacturers, is that this information is incorrect and there are no Free-to-Air digital terrestrial idTV, PVR or STB products on the market place that currently support all of the feature sets recommended in the consultation as minimum specifications on future products. techUK is concerned that this misinformation, as contained within the Ofcom consultation report, is leading to the conclusion that the mandating of these feature sets is potentially straightforward as these features exist on products in the market place today. However, as this is not true, the reality of designing products with this combined feature set is not straightforward.

techUK would like to make clear that we believe that the development of the full suite of

feature sets as proposed within the Ofcom consultation will require a high level of engineering development resource, additional cost and an increased component specification in terms of chipset processing power and memory capacity in some products, particularly entry products.

The mandating of such specifications could have three impacts that we believe are against the best interests of all consumers, including the visually impaired user groups.

Firstly, it may force manufacturers to withdraw products from sale in the UK which cannot meet the new mandated specifications, leading to a reduced choice of products for UK consumers versus other markets.

Secondly, it is likely to increase the selling price of products, particularly at the entry level, placing an increased cost burden on all product purchasers, whether they wish to make use of these features or not.

Thirdly, mandating specifications unique to the UK will place an additional barrier to entry for device manufacturers launching products. This approach could result in a reduction in choice for consumers in the future in the UK versus other market places.

techUK, and its device manufacturing members, are against the mandating of these feature sets across all products within the idTV, STB and PVR sectors. We do not believe that blanket mandating will act in the best interests of the market or consumers. Device manufacturers are committed to the continued development and roll out of feature sets that improve accessibility for visually impaired user groups. We expect that these feature sets will continue to develop, however, it is impractical or impossible to introduce these features on every product offered to the market in the near or medium term and mandating is likely to act against the interests of the market as a whole.

The mandating of specific feature sets can result in the stifling of innovation in areas such as accessibility. Product and Feature innovation is best left to the expertise of device manufacturers who are continually making huge investments in product research and development. techUK does not believe that regulatory intervention is proven to support innovation, conversely it can have the opposite effect and stifle innovation as incentives to design and innovate are removed when feature sets are bound by rigid specification. For example we can see developments currently in connectivity between devices such as televisions and smart phones where the smart phone can act as a controller and an enabler of additional feature sets. It is possible that the smart phone can enable increased accessibility features and we have concerns that the mandating of defined features and the method of delivery of these features acts against the best interest in delivering the strongest product and feature innovations.

techUK agrees that it is important that viewers with visual impairments, along with support for other user groups with special or specific requirements, are considered and that stakeholders across the content, delivery and device industries collaborate to develop innovative solutions that support all user groups. However, we strongly believe that the best and most innovative solutions and feature sets come from within a light touch regulatory framework. We believe that this proposed mandating of specific solutions will act against the development of the most innovative solutions in the longer term, stifling and restricting choice and innovation.

techUK recommends alternative solutions to meeting these market requirements.

i) Research related to the current solutions on the market place and the user preferences as to

the currently available solution options.

- ii) Joint industry collaboration on standardisation of current solutions that can be applied across the widest possible range of services and devices.
- iii) The development of compatible applications across differing services and devices. All of the stakeholders that techUK have spoken to have a strong view that an application approach via connected devices has the potential to offer more fit for purpose user solutions.
- iv) Joint industry activity relating to clearer communication to these user groups on the solutions that are available, helping users make more informed choices.

Question 1: Do you agree with the range of potential benefits of TTS for TV viewers with visual impairments described in paragraph 3.5? Do you have any information that would help to quantify the potential benefits?:

techUK agrees that TTS can assist viewers with visual impairments. However, the functionality of TTS solutions can vary greatly depending on the software used. In considering TTS services Ofcom would need to take into account the following:

1) Current TTS enabled products tend to be found on premium models within device manufacturers' ranges. This is because the development of the TTS software and integration into devices, taking into account the processing power and memory required to enable this feature, does require more expensive hardware and software than is currently utilised on products in the entry and mid sectors. Device manufacturers have informed techUK that offering TTS features across all PVR, STB and idTV receiving devices is likely to result in increased costs on entry and mid-range products. This could impose unnecessary costs on product purchasers that have no requirement for this feature and could also reduce the affordability of entry products across PVR, STB and idTV for low income purchasers.

2) techUK does not believe that it is in the interests of the majority of product purchasers that this feature is mandated across all PVR, STB and idTV receiving devices due to the imposition of an additional cost burden. techUK believes that device manufacturers should be able to select which models within their ranges that carry these features.

3) Ofcom will also need to consider how a minimum standard of TTS operability could be agreed upon and how it could be objectively measured. TTS solutions could vary greatly and therefore techUK sees no value in considering the recommendation of a solution without setting benchmark operational performances. This minimum specification needs to consider the language variances for TTS on offer and also the level of TTS translation accuracy that is required to ensure that TTS functionality provides a level of description that is beneficial to the user.

Question 2: Do you have any information that would help to quantify the additional costs that EPG providers and TV receiver manufacturers would face in providing TTS capability in multi-functional TV receivers?:

It is not possible to give precise costs on such features without a detailed specification of any requirements having been developed. What we can say with some certainty is that there are clearly significant costs involved in resourcing the engineering power required to develop and implement such solutions. It is also known that for many products currently in the market place increased chip processing power and memory capacity would be required to enable new feature sets.

The consumer electronics device market place operates on very slim margins across the supply chain. It is reasonable to assume that any additional costs imposed on device manufacturers are likely to be passed on through product selling prices to product purchasers at the point of purchase. The mandating of such feature sets across entire product ranges is likely to impose additional cost burdens on all product purchasers, not just those who will make use of these feature sets.

Question 3: Do you agree that the EPG Code should be amended as proposed in Annex 5 to require that EPG providers use their best endeavours to secure that TTS-enabled EPGs are incorporated in multi-functional TV receivers?:

techUK does not agree that the EPG code should be amended, as proposed in Annex 5, to enforce the enablement of TTS EPGs in all devices. The reason for our objection is threefold.

- 1) We believe that enforced enablement of this feature set is likely to increase market pricing of entry level devices, disadvantaging those who do not require the feature set and/ or those on low incomes.
- 2) Enforcement of this feature set may result in a reduction of choice for consumers as device manufacturers are forced to remove ranges and models from sale in the UK that cannot comply with the requirements.
- 3) The device manufacturing industry is a global industry. Globalisation of platform engineering and production scale keeps costs low. For example, the consumer buying price of televisions, and recording devices has consistently declined on a like for like inflation adjusted basis over the last 20 years. This is partly driven by the economies of scale of global engineering and production. It must be recognised that the UK cannot operate as a separate and unique entity when setting technology standards and platform specifications that device manufacturers are then compelled to follow as this has a twofold effect of driving up cost and slowing the rate of technology adoption and new model development and production.

Question 4: Do you have any information that would help to quantify the additional costs that EPG providers and TV receiver manufacturers would face in providing the ability to highlight or list separately programmes with audio description and signing in multi-functional TV receivers?:

We refer to our answer for Q2.

Question 5: Do you agree that the EPG Code should be amended as proposed in Annex 5 to require that EPG providers use their best endeavours to secure that EPGs in multi-functional TV receivers enable users to highlight or list separately programmes with (a) audio description and (b) signing?:

techUK does not agree that the EPG code should be amended, as proposed in Annex 5, to enforce the highlighting of audio description and signing in all devices. The reason for our objection is as covered in the answer to Question 3.

Question 6: Do you have any information that would help to quantify the additional costs that EPG providers and TV receiver manufacturers would face in providing the ability to enlarge text or magnify portions of the EPG in multi-functional TV receivers?:

We refer to our answer for Q2.

Question 7: Do you agree that the EPG Code should be amended as proposed in Annex 5 to require that EPG providers use their best endeavours to secure that EPGs in multi-functional TV receivers enable users to adjust the display of EPG information so that it can be magnified or the text enlarged?:

techUK does not agree that the EPG code should be amended, as proposed in Annex 5, to enforce the magnifying or enlarging of text. The reason for our objection is as covered in the answer to Question 3. We believe that the description of 'magnifying' in this context is unclear and could be interpreted in different ways. If Ofcom were to standardise such a feature then objective operational and measurement criteria would need to be set.

Question 8: Do you have any information that would help to quantify the additional costs that EPG providers and TV receiver manufacturers would face in offering the ability to select a high contrast display of the EPG in multi-functional TV receivers?:

We refer to our answer for Q2.

Question 9: Do you agree that the EPG Code should be amended as proposed in Annex 5 to specify that EPG providers use their best endeavours to secure that EPGs in multi-functional TV receivers enable users to have the option of switching to high contrast displays? Do you agree that a minimum contrast ratio of 7:1 would be appropriate for high contrast displays?:

techUK does not agree that the EPG code should be amended, as proposed in Annex 5, to enforce the enablement of switching high contrast displays. The reason for our objection is as covered in the answer to Question 3.

Question 10: Do you agree that, for the time being, the EPG Code should be amended as proposed in Annex 5 to require that EPG providers use their best endeavours to secure that the additional accessibility features (i.e., text-to-speech, filtering or highlighting, magnification and high contrast displays) are incorporated in EPGs for multi-functional TV receivers?:

techUK does not agree that the EPG code should be amended, as proposed in Annex 5, to enforce the enablement of additional accessibility features. The reason for our objection is as covered in the answer to Question 3.

Question 11: Do you agree that EPG providers should be required to use their best endeavours to secure that specified accessibility features are incorporated in multi-functional TV receivers?:

techUK does not agree that the EPG code should be amended, as proposed in Annex 5, to enforce the enablement of additional accessibility features. The reason for our objection is as covered in the answer to Question 3.

Question 12: Do you agree that, absent regulation, the proposed accessibility features might not be included in all new multi-functional TV receivers whose core specifications are determined by the EPG provider or otherwise agreed between the EPG provider and the manufacturer?:

techUK does not support a regulated approach to the increased availability of feature sets for visually impaired users. As Ofcom has reported in the consultation document, we already have for sale in the UK market place devices which provide features, such as TTS, to support accessibility for visually impaired users. However, Ofcom's report on features that are currently available is incorrect (Figure 1, Page 10) and we know of no devices in the market place which currently offer all of the proposed features.

Device Manufacturers that techUK has spoken to have confirmed that they do not believe that is possible from an engineering perspective or cost effective on entry and mid- level models to enable all of these features on all devices across the ranges of PVR, STB and idTV. Many device manufacturers have also made clear that their engineering and product development is managed on a global perspective and producing unique variants for an individual market is unrealistic. This could result in a reduction of range choice for UK customers across PVR, STB and idTV.

Question 13: Do you agree that the EPG Code should be amended as shown in Annex 5?:

techUK does not agree that the EPG code should be amended, as proposed in Annex 5. The reason for our objection is as covered in the answer to Question 3.