



**SKY'S RESPONSE TO  
OFCOM'S CONSULTATION ON SPEAKING TV PROGRAMME GUIDES**

**Question 1: Do respondents agree with Ofcom's initial assessment that apps for mobile devices have the potential to be useful for those people with visual impairments who feel confident using touch-screen technology and can afford a suitable mobile device? If not, why not?**

We agree with Ofcom's assessment that mobile devices have the potential to be useful for people with visual impairments who use mobile devices. That is why our next release of the television companion app, the Sky + app, scheduled for release this Autumn, has been developed in conjunction with the RNIB and is optimised to work with IOS and Android Text To Speech capabilities.

Electronic Programming Guides (EPGs) are evolving rapidly and mobile apps offer the best opportunity to allow visually impaired users access to much of this functionality.

**Question 2: Do respondents agree with Ofcom's initial assessment that apps for mobile devices are less likely to meet the needs of the majority of visually-impaired people who are 65 or older, both because they are less likely either to own a suitable mobile phone and because touch-screen apps present a number of actual and perceived barriers to use. If not, why not?**

Studies have shown that mobile and smart device uptake amongst the over-65s is increasing - see for example here: <http://media.ofcom.org.uk/news/2014/tablets-help-drive-increase-in-older-people-going-online/>

From our own user testing that we have conducted on accessibility requirements, we have observed an enthusiastic uptake of mobile devices amongst the visually impaired community across a wide age range spectrum. More research to establish take-up and opinions amongst this demographic would be useful.

We of course accept that there are still those that may not take up this technology due to real or perceived barriers. For this group there is the possibility of exploring initiatives to support and up-skill users to use assistive technology on mobile devices. This has the benefit of not only allowing customers to have a better viewing experience of our television content, but means they will benefit from the wider use of mobile technology.

From a cost perspective there are now mobile devices on the market that could be

used with apps that are available relatively cheaply (from about £45). Also, the Sky + app is a free download so does not cost the customer anything extra. This is in comparison to existing embedded TTS products on the market such as the Panasonic TV which are comparatively very expensive.

**Question 3: Do respondents consider that it would be reasonable for visually-impaired viewers to pay more than sighted viewers for the ability to use EPGs or substitutes for the same purposes as sighted viewers? If so why?**

We are committed to giving the same experience to all of our customers including those with disabilities and do not feel it is appropriate for visually impaired customers to pay more than sighted customers for the same service. That is why for example we provide an accessible version of our remote control free of charge on request from our Accessible Customer Services Team.

In October 2010 in partnership with RNIB, the Sky Talker was made available to customers as a standalone product that customers could connect to their Set top boxes to read out the EPG grid. When this was first developed with the RNIB it was intended solely as a short term solution and it was made available during this period at a cost of £60.

Since then, the extent to which the user interface of our STB has evolved to reflect customer demand for a wide range of viewing options, together with the limitation that the Sky Talker is only able to speak the EPG grid and is not compatible with our HD products, led us to take a decision to discontinue this product.

The new Sky+ app launched this Autumn can be used with voiceover technology on both iOS and Android. In addition to offering greater functionality, it will be available at no extra charge. Accordingly, this represents a much better proposition for our customers.

**Question 4: Do respondents agree with Ofcom's initial assessment that the speaking EPGs integrated into TVs and set top boxes may be easier for people with visual impairments to use than touch-screen apps? If not, why not?**

We do not necessarily agree that providing speaking EPGs integrated into Set Top Boxes will provide the best experience for our customers. In the user interface that customers now navigate, content is surfaced in a variety of ways including not only through the EPG but also through on-demand, catch-up and buy-to-keep facilities and including third party services. This is a much more complex space than just the grid EPG. Reliance on the EPG as the sole mechanism of access for visually impaired viewers would mean it would not be possible to create a viewing experience equivalent to that of a sighted viewer. We believe a more holistic response is required. In an increasingly converged world the boundaries of where

the user is navigating and who has responsibility for that part of the platform are more complicated. For example, if a user were to navigate to a third party section on the Sky Platform, we would need to ensure that it was compatible with the Sky TTS technology. If this did not work properly it would create a poorer experience for users as their navigation moved outside the TTS environment.

The processing power and memory of a STB is very limited compared to a smart mobile device. Also, the technology design and release programme for mobile devices is much quicker and more agile than it is for STBs, meaning it is far easier to ensure apps are up to date with the latest features optimised for TTS.

It is also the case that as TTS technology on smart devices is more established and widely used than for STBs, it is more advanced and easier to use than it would be in the STB. For example, voice is configurable to the user's requirements which would not be possible on the STB. Also, because TTS on mobile devices has much wider applications, users only have to learn the navigation rules for one system, rather than learning different TTS systems for different products.

Embedding the capability on a STB is a relatively time and resource intensive way of providing TTS and since it has to be designed into the box it has to be used for all customers, whereas investment in the app can be much more targeted while still creating seamless continuity with the box.

When comparing the capabilities of smart mobile devices with those of a STB, together with the many other advantages, we strongly believe that the use of mobile apps offers the most versatile environment thereby enabling us to create the best experience for our visually impaired customers.

**Question 5: Do pay TV service providers such as Sky, Virgin, Talk Talk and BT TV see additional obstacles that would prevent them from committing to including text to speech capabilities in the next planned upgrades to the receivers they offer to subscribers? If so, what are these obstacles? Absent regulation, would these obstacles make it impossible on commercial grounds to commit to the necessary investment?**

We believe there are significant obstacles to integrating TTS into Set Top Boxes while keeping the full rich user experience of the interface (see answer to question 4 above), and as we have stated an app will create a better user experience for a customers. However, there is a place for elements of TTS to be integrated and we do not see that there are any fundamental technological barriers to doing this. For example, converting the EPG grid to speech may be a useful piece of functionality, but for the best experience this should be supplemented by a mobile device.

**Question 6: If the cost of providing speech-enabled receivers to all those who subscribe to particular pay TV services would entail a substantial delay to the**

**roll-out of such receivers to all subscribers, would it be feasible, quicker and more cost-effective to offer suitable equipment first to viewers with visual impairments?**

Any technology introduced would need to be embedded within the STB. As such, it would not be possible to roll out to just customers with visual impairments - the capabilities have to be designed into the box itself.

**Question 7: Do respondents consider that it would be reasonable to expect visually-impaired viewers to pay extra for equipment that allows them to use EPGs or substitutes for the same purposes as sighted viewers? If so, why?**

Sky is committed to giving the same experience to all of our customers including those with disabilities and do not feel it is appropriate for visually impaired customers to pay more than sighted customers for the same service. We would apply this principle for an accessible STB or companion app in the same way we apply it to the free provision of an accessible version of our remote control.

**Question 8: Do licensors such as Freesat and Freeview see obstacles to using their leverage to require manufacturers to incorporate speaking EPGs in future versions of products authorised to use their brands, such as Freetime and Freeview Connect?**

N/A

**Question 9: What are the main types of cost that pay TV service providers would face in incorporating speaking EPG features into the next generation of their set top boxes?**

The main costs that would be encountered through incorporating speaking EPGs into Set Top Boxes are the licensing costs of software; the development of infrastructure work; additional processing and memory requirements within the box and lastly additional phases of user testing.

**Question 10: What is the scope for connected platforms to avoid the need for specific TTS provision within consumer equipment by using cloud-based resources (e.g. speech files on a central server delivered to the device as required)?**

This would be a more complex, and ultimately more expensive solution for Sky. It is also reliant on customers' connectivity.