

## Cover sheet for response to an Ofcom consultation

### BASIC DETAILS

Consultation title: Speaking TV guides: would they help people with visual impairments and are they feasible?

To (Ofcom contact): Jacopo Genovese

Name of respondent: Freesat (UK) Limited

Representing (self or organisation/s): Freesat (UK) Limited

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### CONFIDENTIALITY

Please tick below what part of your response you consider is confidential, giving your reasons why

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Whole response	<input type="checkbox"/>	Organisation	<input type="checkbox"/>
Part of the response	<input type="checkbox"/>	If there is no separate annex, which parts?	

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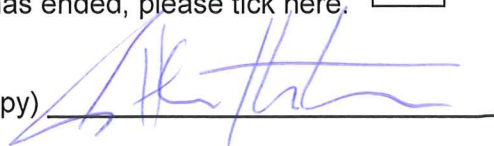
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Name Matthew Huntington

Signed (if hard copy)



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5 September 2014

Dear Sirs

**Response to consultation on Speaking TV guides: would they help people with visual impairments and are they feasible?**

Freesat welcomes the opportunity to respond to this consultation. Please find set out below Freesat's responses to the specific questions aimed at free-to-air TV services such as Freesat.

*Q7. 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?*

Freesat and its shareholders do not believe visually-impaired customers should have to pay more to enjoy programming for which they already pay a licence fee.

The BBC and ITV own Freesat. We share the commitment of our shareholders to ensure that visually-impaired viewers can enjoy the programmes and services that are funded by the licence fee without additional costs.

To-date, efforts to make programming accessible to visually-impaired viewers have focused principally at the channel level, via audio description within programming. Freesat would welcome any industry efforts to ensure that this also happens at a platform level.

Freesat does not develop or manufacture its own televisions or set-top boxes, but works with third party manufacturers to do so. Freesat is able to define, to an extent, the "look and feel" of its services on each of these devices with the manufacturing partners, particularly with its new "Freetime" service. Were there an industry-wide effort to make television programming more accessible for the visually impaired at a platform level, Freesat would back this. However, it is important to highlight that Freesat cannot ultimately compel its manufacturing partners to include features such as speaking EPGs into their TV devices. Therefore Freesat cannot control whether a manufacturing partner may seek to recoup the costs of development from the consumer by charging extra for the speaking EPG enabled equipment.





*Q8. 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?*

Whenever a new Freesat-enabled TV device is developed, Freesat works with its manufacturing partners to define what features should be included within the Freesat area of the device, and which should not. Freesat is very happy to use its leverage with manufacturers to seek to ensure speaking EPGs are incorporated into new TV devices, as it would with any product enhancement. However, as stated in response to question 7 above, Freesat does not have the recourse to compel its manufacturing partners to include any particular feature into new TV devices.

Freesat believes that Ofcom should also continue to consider the potential use of secondary devices to provide speaking EPG facilities. Freesat estimates that 95% of the UK population will have smartphones by 2017. By this point in time, smartphones should also be priced at a level where they are affordable to all households, as feature phones are today. Despite the limitations Ofcom have identified in the consultation paper, Freesat believes that secondary devices remain a viable and potentially cost-effective method to delivery EPG services for the visually impaired.

*Q10. 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)?*

A cloud-based system to support a speaking EPG feature would require a working internet connection in order for viewers to use it. This causes two main issues:

- 1) Visually-impaired viewers without an internet connection could not use the system if it is cloud-based. As set out in the consultation paper, at present statistics suggest that visually-impaired viewers are less likely to have an internet connection than the average viewer in the UK; and
- 2) If a visually-impaired viewer's internet connection fails or goes down, the speaking EPG will not be usable.

With this in mind and considering the statistic in relation to smartphones set out in response to question 8 above, it is worth noting that a cloud-based system supporting a speaking EPG feature could work well with smartphones. A cloud-based system operating with a wide range of smartphones would reduce the need for visually-impaired people to install an internet connection within their home specifically to use the speaking EPG feature when using their TV device.

It is of note that whilst speech-based search on mobile devices (such as Apple's Siri) are cloud-based, the devices still offer embedded text-to-speech functionality that works when the device is not connected to the internet. In an ideal scenario, a speaking EPG system for TV devices could support both, with it defaulting to a cloud-based system if a user's device is internet-connected and operating on a more limited basis using the device's own imbedded functionality when it is not. However, it must emphasised again that the decision on whether to develop the more limited imbedded functionality for TV devices that are not



connected to the internet falls at the door of the manufacturers of the TV devices themselves and not free-to-air TV services such as Freesat.

Freesat also notes that The Digital TV Group has defined a U-Book that defines usability guidelines for Freeview products with regards to speaking EPGs. Given that Freesat and Freeview share common manufacturing partners (and that any Freesat TV in the UK will also support Freeview), if these manufacturers start to use this standard for Freeview equipment, it would also make sense that they do so for Freesat

Freesat welcomes the opportunity to respond to this consultation and the business looks forward to continuing to work with both Ofcom and all the organisations linked to pursuing this important issue.

Yours sincerely

**Matthew Huntington, Chief Technology Officer**

For and on behalf of  
**Freesat (UK) Limited**