

FREEVIEW response to Ofcom's Call for Inputs:

'Speaking TV programme guides'

8th September 2014

1. Introduction

1.1 About Freeview

Freeview is the most popular TV service in the UK. It is used by 75% of all UK households (over 19 million) and is the sole television provider in 10.7 million homes (40% of TV homes)¹. Digital terrestrial television (DTT), of which Freeview is the cornerstone, is set to remain the country's largest platform for the foreseeable future, with over 12 million main set homes forecast in 2020².

Freeview accounts for more viewing than any other platform, taking 44 per cent of all viewing hours³. With UK consumers spending an average of almost four hours a day watching television⁴, Freeview services - TV and radio - are a crucial part of millions of people's daily lives. Of the 1.8 million people estimated to have partial sight or blindness today, a large proportion of these are likely to have Freeview. And with this number rising to approximately 2.3 million by 2020 due to an ageing population, it is important that Freeview continues to be accessible for the visually-impaired. And indeed, all its viewers.

1.2 About this response

Freeview's response to this consultation has been put together on the basis of the organisation's role as custodians of free-TV and champions of its viewers' interests. It has been prepared by Freeview's management team and does not necessarily represent the individual views of our shareholders.

In relation to accessibility issues, Freeview and Digital UK - the organisation which supports Freeview viewers and channels - work together with a range of industry players including broadcasters, manufacturers, trade bodies and interest groups to encourage and support the development of accessible equipment and to discuss ways in which to further serve viewers with access needs, such as through improvements to our websites.

Given Digital UK's responsibilities for managing the EPG on the DTT platform, providing consumer support and developing the technical specification for Freeview Connected, it has prepared its own response to this Call for Inputs, which we have inputted to. Freeview's response seeks therefore to complement the Digital UK submission rather than duplicate areas already covered.

¹ BARB Establishment Survey, Q1 2014

² 3 Reasons LLP, Spring 2014 Market Model

³ Ofcom Communications Market Report, 2014

⁴ BARB, Establishment Survey, Q1 2014

As a TV service provider and licensor of the Freeview brand, we have responded to Questions 7 and 8 of the Call for Inputs.

2. Answers to Questions

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 purpose as sighted viewers? If so, why?

Ideally, visually-impaired viewers would not have to pay extra for equipment with accessibility features that allow them to use the equipment in the same way as sighted viewers.

As Ofcom suggests, there are likely to be fewer barriers to adopting text to speech for EPGs than previously. However, such an undertaking still incurs extra development and resource costs for a manufacturer. In a horizontal free-to-air market, in which manufacturers do not recover costs via subscription fees, these would most likely be absorbed into a retail price which would then be passed on to the consumer.

The most likely scenario is that TTS technology is built into the higher end models of a manufacturer's range and as a result the price premium passed on to the consumer would be for the latest technology rather than a standalone cost for a speaking EPG.

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?

Freeview grants a Freeview Trademark Licence to all products that meet the requirements of the DTG's D-Book and have passed DTG testing. The Freeview TML allows a manufacturer to use the Freeview brand.

Freeview works with the DTG and manufacturers to help shape the development of new iterations of the D-Book but it does not determine what the technical specification should be. The current process keeps the specification standardised and results in a level of quality and consistency across all products.

For speaking EPGs to become standard in all equipment, the appropriate approach would be for industry to agree this via the DTG and for it to be incorporated D-Book. One of the reasons the horizontal market works well is because there is a range of products on offer with different features and different price points. Given the needs of viewers are so diverse and that the requirements of one segment of consumers may be very different to another, it would seem more sensible for a wide range of products to be available featuring different options for accessibility.