

Question 1: Which of the three options do consultees favour, and why?:

Option 2 is favoured as it:

1. Delivers more services which will be a driver for AD take up (as identified in Ofcom research).
2. A number of channels (which are not included in Option 3) are already at 20%.
3. Presumably the 1% of turnover rule would still apply, so it would not represent an undue burden.
4. There is a growing amount of AD content in the world, films, DVD and Australia is just about to have an expansion of its cinema circuit to include more AD:
http://www.mediaaccess.org.au/index.php?option=com_content&view=article&id=697:major-cinema-chains-apply-for-access-complaint-exemption&catid=1:cinema&Itemid=15; Canada is reviewing its AD and the USA is trying to get AD quotas back via its 21st Century Video Accessibility bill. This all means that such content will be potentially available for UK channels showing such programming. This trading approach has already led to massive exchange in subtitling files across the world, at much reduced costs.
5. In a convergent content world, if content is made accessible at point of origin it can easily flow across to other media and allow consumers to access this content with AD in forms that work for them.
6. As the population ages, more people will need AD and the proposed quota is still quite small (ie 80% of content doesn't have to be AD!).
7. In the UK there has been a general trend of quotas being exceeded and increasing the base quota should help that process.
8. The more AD is required the greater incentives for production costs of AD to drop. This happened with subtitling once it reached a critical mass, 10% is still too low with AD costs roughly twice that of subtitling (on a very broad world comparison).
9. Having a raised quota ensures that AD viewers get more variety of programming and better choice.
10. With the protection of the 1% rule it also ensures that a level-playing-field remains for all channels, so that one does not gain a commercial advantage by NOT providing access.

Question 2: Do consultees have any further suggestions for future access service provision? If so please provide the rationale for these suggestions:

Nil

Comments:

This process shows why Ofcom's approach leads the world in being: clear in intent; practically focussed; willing to tackle issues ahead of time and anticipate problems; quick to act when regulations are breached.

Access is a worldwide issue and changes in regulations, the economics of access are never isolated to one location. What happens in the UK affects other territories, including Australia and vice versa.

Please feel free to contact me if you need any clarification.