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## **S4C's Response to Ofcom's 2009 Review of Television Access Services ("the Review")**

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## 1. Introduction

S4C is a public service broadcaster whose remit is to provide a broad range of high-quality and diverse programming, a substantial proportion of which is in Welsh. S4C receives direct government funding by way of grant in aid and also generates income from advertising sales and sponsorship.

S4C provides the following access services:

- Subtitling (in English). S4C has set its own target of 100% by the end of 2009 (the Ofcom target is 75% for 2009).
- Subtitling (in Welsh).
- Signing.
- Audio description (in Welsh).

S4C does not propose to respond to each question raised by Ofcom in the Review, but has responded below to one question of particular relevance to S4C.

## 2. Specific Response

### Options for future provision of audio description (Section 6)

Ofcom has set out three options for the future provision of audio description services. These include two options to increase the target for audio description from 10% to 20% for certain broadcasters over the period from 2011 – 2015. If such change were to be implemented, Ofcom proposes that the increase apply either to:

- (a) all channels required to provide access services (Option 2); or
- (b) the 10 statutory PSB services (Option 3).

Under both Option 2 and Option 3, the proposed increase from 10% to 20% would apply to S4C.

Under the current Code on Television Access Services, broadcasters (other than statutory PSBs) are not required to spend more than 1% of their relevant turnover on providing access services. This is on the basis of one of the criteria in section 303 of the Communications Act 2003, namely that Ofcom must have regard to the cost, in the context of the other relevant criteria, of providing television access services. We understand that this cap of 1% would continue to apply to non-PSBs under Option 2.

The amount which S4C spends on access services as a percentage of its relevant turnover is already in excess of 1%. The additional cost arising from doubling S4C's target for audio description services would increase this percentage further. S4C believes that its audio description target should remain at 10%.

Paragraph 6.49(c) of the Review states that Option 3 “would limit the costs incurred by smaller channels, by maintaining the 10% statutory quota applicable to them” and “only the larger public service channels would incur additional costs”. S4C does not believe that it should be subject to the increase from 10% to 20% for audio description to the same extent as the larger PSBs, as the cost of providing such increased access services would be disproportionate to its turnover in comparison with other larger statutory PSBs.

S4C believes that its cost per hour of providing access services is similar to the other PSBs, as it obtains these services in the same market place. As a result, its costs of providing access services are assumed to be significantly higher as a proportion of its turnover than in the case of the other PSBs. In addition, S4C could be subject to a reduction in its turnover, in particular due to its main funding being based on RPI.

### **3. Conclusion**

Should Ofcom decide to adopt Option 2 or 3, S4C requests that, if its costs of providing access services following such increase would be more than 1% of its relevant turnover, its target for audio description should remain at 10%.