

Sara Winter  
Fifth Floor  
Content and Standards  
Ofcom Riverside House  
2A Southwark Bridge Road  
London SE1 9HA

12 November 2009

Via email

Dear Sara,

**Re: Review of Television Access Services Consultation**

Virgin Media Television is committed to providing a high level of access services across our portfolio of channels. In particular, we recognise the benefit of audio description to our partially sighted viewers, and we already surpass our current obligations in this area. We are also committed to becoming more viewer-centric in the programming we select for access services, so that we are delivering the maximum possible value to viewers who use audio description and subtitling.

Ofcom will understand that we have limited resources to support our access services. We would prefer to prioritise this expenditure on fresh, high-profile content that meets the expectations of our audience, and we do not believe that imposing higher quotas will necessarily deliver that result.

We would highlight some practical issues for commercial multichannel broadcasters like ourselves that might prevent an increase in the quotas for audio description resulting in the best possible service for partially sighted viewers. Our portfolio of channels has a high level of first-run content, much of which is delivered very close to transmission. In some cases, the turnaround time is insufficient to permit these first transmissions to be audio described, although we do our best to provide full access services on as much of our premium output as possible. In contrast, a higher quota level would require us to use programming already in our library, which many viewers would already have seen and would be a less attractive substitute.

We therefore favour option three in Ofcom's consultation – 20% audio description targets for the ten statutory PSB channels and 10% on all eligible commercial services. We will continue to exceed our current obligations wherever practicable, but maintaining the current quota will allow us to focus our efforts in a viewer-centric way.

We offer no comment on the other issue in Ofcom's consultation, concerning access service obligations for channels broadcasting in other EU member states.

Yours sincerely,

**Patrick Robinson**

Head of Corporate and Public Affairs, Virgin Media Television