

Question 1: Do consultees agree that these are appropriate policy objectives for Ofcom in considering possible alternative arrangements for signing on television?:

Yes, based on the Ofcom research results from talking to deaf people and deaf organisations, it is clear that few deaf viewers watch sign interpreted programming on channels with small audiences, preferring subtitles programming.

It therefore makes sense to consider alternative arrangements that allow sign presented programming to be aired in more accessible time slots.

Question 2: Do consultees agree that Ofcom has identified appropriate options?:

Yes, the options outlined are reasonable and appropriate.

Question 3: Do consultees agree with Ofcom's reasons for rejecting the ideas described in paragraph 3.18?:

Yes.

Question 4: Do consultees agree with the proposals outlined in paragraph 3.32?:

The cost of providing 30 minutes of sign presented programming once a month would represent a substantial increase in cost which would be prohibitive to many channels with small audiences.

For library based channels, there would also be the added burden of commissioning programming from an external production company.

As a result, this proposal is only feasible as long as these channels can share costs by entering into a voluntary arrangement together to provide sign presented programming (such as the proposed Community Channel scheme).

Sparrowhawk Media would enter into such an arrangement on behalf of the Hallmark Channel.

Question 5: Do consultees agree that the aim should be to put any new arrangements in place from the start of 2008?:

Yes, it is reasonable to put the new arrangements in place from the start of 2008, as long as this allows enough time for any voluntary arrangements to share production costs to be put in place.

**Question 6: Do consultees have any comments on the impact assessment?
Where possible, it would be useful for arguments about the cost of
different options to be supported by relevant data.:**

Ofcom estimates that a channel currently required to sign 2% of programming would need to contribute approximately 20,000 to any voluntary scheme (such as the proposed Community Channel scheme).

While this sum is not excessive, for channels with small audiences this may well represent an increase in relation to the amount spent on providing sign interpreted programming under the current arrangement.

Question 7: Do consultees consider that the proposed revisions to the Code are sufficiently clear?:

Yes.

Comments: