



The BBC's response to Digital UK's consultation on the allocation of an LCN for the Freeview Accessible TV Guide

7 November 2019

The BBC welcomes the opportunity to respond to Digital UK's consultation on the allocation of an LCN for the Freeview Accessible TV Guide.

The BBC wants to be accessible to as many people as possible, whatever their needs, however they're watching - and enabling access to the BBC's services for all licence-fee payers is a fundamental part of that.

Throughout its history, the BBC has pioneered technological innovation in relation to access services. From early experiments with closed subtitling and audio description to the breakthrough technology of the K-LIVE re-speaking live subtitling system, the BBC has led the field in finding ways to make the BBC's content more accessible to audiences with specific needs.

Back in 1979 the BBC was the first broadcaster to use the still new Ceefax technology to provide subtitles on a documentary about deaf children called "Quietly in Switzerland." Another first followed in 1986 when Blue Peter was the first live programme to benefit from subtitles. Today, the BBC routinely subtitles 100 per cent of programmes across our regulated TV channels.

In 2000 the BBC took advantage of burgeoning technology to launch its audio description service which has gone from strength to strength since its inception. While the BBC has voluntarily committed to provide 20 per cent of its programme content with audio description, in reality the service is delivered on many more programmes. Last year, audio description was available on over 22 per cent of programmes on BBC One whilst on BBC Four almost 40 per cent of programmes were audio described.

In 2008 the BBC iPlayer launched and not only delivered full accessibility to its interface but also made available subtitled and signed content, with Audio Description following soon after in 2009. This was the first fully accessible VOD service. The learnings from this enabled the BBC to develop digital accessibility guidelines ensuring its online and mobile products maintain a high standard for accessibility.

As audience habits evolve and online viewing expands it is vital the BBC builds on the solid foundations of the broadcast service; this represents the next big challenge. Currently, any programme that is broadcast with audio description is available with AD on the BBC iPlayer. Of the programmes on BBC iPlayer from our regulated, broadcast channels, almost 30 per cent are available with audio

description. In the longer term, the BBC team hope to make audio description available on the iPlayer live stream of the BBC TV channels.

The BBC recognises that some platforms still have some work to do in order to better enable accessibility on their devices for their users, and in particular to reflect the level of content that has access services enabled - and as such, BBC welcomes Ofcom's recent work in this area including the EPG Accessibility consultation and the corresponding statement in June 2018.

The BBC notes the opportunities that internet-connected devices bring to all users with visual and/or aural impairments and fully supports Freeview's initiative in making the EPG on its Freeview Play devices more accessible to users with visual and aural impairments.

***In relation to the specific questions posed by Digital UK in the consultation:***

BBC agrees with Digital UK's recommendation that 555 is the better of the two options presented, and can think of no other suitable and available number for the Freeview Accessible TV Guide. Furthermore, having a channel number like 555 for the Accessible TV Guide should make the service easy to remember and communicate, in much the same way that 888 was for the first analogue teletext subtitles on BBC Ceefax.

Whilst 888 would have seemed the most immediate obvious choice given the number's legacy in relation to access service provision<sup>1</sup>, we understand that Digital UK are unable to allocate this number in accordance with D-Book provisions.

This all said, we see nothing against certain other alternatives e.g 257 or 456 where the 'raised dot' key "5" sits in the middle of a straight vertical or horizontal row of three digits which should assist in both memorability of the LCN and accessibility of the guide.

ENDS

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<sup>1</sup> 888 was the number used on remote controls to access subtitles on analogue text services like BBC's Ceefax.