

13 September 2000

Mr D Gooney
Broadcasting Policy Division
Department for Culture, Media & Sport
2-4 Cockspur Street
LONDON SW1Y 5DH

Dear Mr Gooney

Review of Statutory Requirements for the Provision of Subtitling, Sign Language & Audio Description Services on Digital Terrestrial Television

We are writing in response to the Consultation Paper concerning the above subject.

Granada Sky Broadcasting ("GSB") supports the provision of subtitling, sign language and audio description services ("the Services"), for people who are deaf, hard of hearing, blind or partially sighted.

It is our view however, that the present requirements do not take into account audience size and therefore channels' abilities to fund the Services, discriminate against channels broadcasting on DTT and take no account of the lack of availability of systems to deliver sign language and audio description services to the audience at present.

GSB currently broadcasts three television channels, Granada Plus, Granada Breeze/Men & Motors via cable, satellite and two multiplexes on digital terrestrial television ("DTT"). As part of its DTT licence, the Company is obliged to supply the level of Services outlined in the consultation paper. These Services currently cost GSB £300,000 per annum and this figure will rise to £1,000,000 per annum at current day prices, when the final targets are reached in ten years time. These costs are split almost equally between Granada Plus and Granada Breeze/Men & Motors.

The current viewing share, across 24 hours for the GSB channels is 0.7% for Granada Plus and 0.3% for Granada Breeze/Men & Motors.

It seems unfair that a channel such as Granada Breeze/Men & Motors with less than half the audience of Granada Plus should be obliged to supply the same level of Services. Similarly, Granada Plus must supply the same level of services as channels with five and six times the audience.

Audience levels obviously affect the funds available for channels to invest in their programming and Services. They also reflect, pro-rata, the number of people who would benefit from the Services provided. It therefore seems reasonable to propose that for channels with smaller audiences, and consequently lower numbers of disabled viewers, that the level of required Services should be similarly reduced, thus reflecting more fairly the costs of the Services against the channels income.

It is also our belief, that channels of our size looking to enter the multi-channel environment, will be dissuaded from the DTT platform given the high cost of providing the Services, and will therefore favour the cable and satellite platforms where they are not required to fulfil these obligations. This will lead to less choice for the DTT viewer generally and obviously for the disabled viewer particularly, who will only be able to benefit from the Services on DTT.

GSB is currently spending £60,000 per annum on audio description and it is our understanding that currently only a handful of people are able to receive this service since the first prototype equipment will not be available until early 2001.

It is our belief that the increase in the percentages of programmes being audio described should be suspended until a significant proportion of blind and partially sighted viewers are able to receive the service.

As you are probably aware, open caption signing means that all viewers can see the person signing the programme. The signing is distracting for viewers who do not require the service and will obviously become more of a problem as the percentage of programmes requiring signing increases.

The solution is closed caption signing where a viewer only accesses the service when they require it. Unfortunately at the present time there are no closed caption solutions available.

We therefore believe that until such a solution is found the level of signing should remain at no more than 1% as at present.

Given the technological difficulties that continue to beset audio description and signing, the ITC's requirement that the shortfall in Services following the six month delay in implementation should be made up by November 2001 seems unreasonable, especially given the expenditure which is currently being out-laid for very small benefit to our disabled viewers.

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We would suggest that the requirement to make up the shortfall by November 2001 be cancelled.

Given the level of expenditure that GSB is currently paying to provide the Services it would not be possible to fund the distribution of the consumer equipment as suggested in the Consultation Paper.

GSB continues to believe that the provision of the Services should enrich the viewing experience of all disabled viewers, but that there should be equality between distribution platforms, relativity between television channels based on audience and a recognition that the technology does not yet allow us to provide systems that can adequately deliver the audio description and signing services and therefore the increase in the requirements should be suspended.

Yours sincerely

Rob Ovens
Acting Chief Executive Officer