



Review of the Statutory Requirements for the Provision of Subtitling, Sign Language and Audio Description Services on Digital Terrestrial Television September 2000

Turner Broadcasting System Europe welcomes this opportunity to respond to the Department of Culture Media and Sport's review of the statutory requirements for the provision of subtitling, sign language and audio description services on digital terrestrial television. Turner Broadcasting has been broadcasting Cartoon Network on the OnDigital DTT service since its launch. We strongly support DTT as an additional distribution platform for our well-established cable and satellite services.

Cartoon Network's DTT service is identical to the service operated on cable and satellite in both analogue and digital. Given the limited audience for DTT services at present it would not be viable to operate a distinct Cartoon Network for DTT. The additional requirement for subtitling, sign language and audio description for the DTT service represents a significant regulatory burden that we do not face for the equivalent non-DTT service. Nevertheless by applying for a DTT licence we have accepted that these statutory requirements will be placed upon us and we will meet them.

Should the targets be changed or are they about right?

Given the limited audiences available for DTT services we do not believe there would be any justification at present for the targets to be increased. The latest subscription figures for OnDigital services show that they have 673,000 subscribers (31 March 2000). Given the marginal number of additional viewers that non-analogue terrestrial channels gain from broadcasting on DTT any rise in the targets would militate against helping to develop the platform further.

We accepted the targets for subtitling, sign language and audio description at the time our licence was granted. However it has become apparent that due to the limitations of technology that the targets for sign language and audio description are not necessarily appropriate. No system for closed signing is available and we understand that fewer than 100 homes have equipment for audio description.

Given the limited uptake of DTT to date and the lack of a technological solution for closed signing and for audio description we do not think it would be right to raise the targets further at this time.

If the targets remain unchanged should there be a further review and, if so, when?

The most appropriate time to review the targets would be at the same time as the review of the switch-off date for analogue television. It is only at the time of switch-off that the potential total audience for DTT channels reaches that at present. Even after analogue switch-off only the free to air channels will have the maximum reach. Channels such as Cartoon Network will still rely on its own marketing to persuade viewers to subscribe to the

package in which the channel is contained.

What are the costs of delivering and receiving services?

The prices that Cartoon Network has negotiated with its suppliers for these services are commercially sensitive and must remain confidential. However the figures fall within the ranges provided by the Satellite and Cable Broadcasting Group in their submission to this review, which are:

Subtitling	£200-500 per hour
Sign Language	£500-2000 per hour
Audio Description	£700-2000 per hour

Would the quality of subtitling be affected if targets were increased?

Standards for subtitling are laid down in guidance from the Independent Television Commission. We expect to meet these standards regardless of the volume of subtitling we are required to provide.

Should there be different targets for different broadcasters perhaps based on audience share of channels?

The terrestrial analogue broadcasters – both commercial and public service – have been required to provide subtitling for a number of years. Their services are available free to air to almost all the UK population and they have access to advertising revenues or public funding at a commensurate level. Other broadcasters do not have such automatic audience access and must work to get every viewer they have - they exist in a completely different commercial operating environment. As we are not competing on the same terms as the existing analogue broadcasters it would seem appropriate to examine whether the targets should continue to be the same for all broadcasters.

Should new channels be exempt from targets or have lower targets at first?

We believe that for some broadcasters the targets could prove to be a significant barrier to entry to Digital Terrestrial Television. Any reduction in targets or a time-limited exemption would help to lower any such barrier. However, some channels may take a considerable period of time to become profitable even without additional cost burdens placed upon them.

Should broadcasters who broadcast several channels be able to bundle their subtitling output between channels in order to meet an overall target?

At present Turner Broadcasting only has one channel broadcasting on DTT and therefore subject to the targets.

We can see an argument for a broadcaster with more than one channel to bundle their subtitling where a channel contains less programming amenable to subtitling than others.

Which programmes or channels should be priority for subtitling, signing and audio description?

We have no comment to offer on this question. We would welcome the views of people with sensory disabilities as to their own priorities for these services.

How should equipment costs to the consumer best be met?

Turner Broadcasting is a television channel content provider. We have no involvement with the manufacture of television equipment and have no comment to offer on this question.

If the targets are increased, what will be the financial impact on broadcasters' programming?

If the targets are increased then our costs will rise in line with the costs of providing these services to viewers. While Turner Broadcasting owns the broadcasting rights to much of the Cartoon Network output, we are increasingly investing in the acquisition and production of European programming in order to more closely tailor our channels for their target audiences. Any increase in programming costs from increased targets for subtitling, signing and audio description will necessarily reduce the amount available for investment in new programme acquisition and production.

If the target for sign language is increased in advance of the implementation of a technological solution to closed signing then, because of the intrusive nature of signing, there may well be a tendency to broadcast signed programmes during low audience hours.

What are the opportunity costs to broadcasters in terms of alternative possible uses of spectrum in providing subtitling, signing and audio description services?

The introduction of closed signing is likely to have the most impact on spectrum and will have an impact on the ability to offer interactive television services while closed signing is being broadcast.

Should the cable and satellite channels be required to provide these services?

We do not believe that statutory requirements to provide subtitling, sign language and audio description should apply to cable and satellite channels. As stated above cable and satellite channels operate in a completely different commercial environment unable to command anything like the audiences or advertising revenues of the established terrestrial channels.

Turner Broadcasting now has eleven ITC licensed services (excluding our DTT service) seven of which are international channels that have obtained their licences within the last twelve months. We believe it would be prohibitively expensive for us to operate these fledgling services if statutory requirements on subtitling, signing and audio description were to be applied to them.

The other services include CNN International which contains a major proportion of live and breaking news assembled from a variety of international sources and which would pose severe technical problems for subtitling, signing and audio description services.

On one of our other services – TCM (formerly TNT Classic Movies) – we have made great efforts to subtitle our film catalogue. To date 56% of the active library of TCM films has been subtitled and this figure continues to rise.

The two remaining domestic services are Cartoon Network and Boomerang. While Cartoon Network is our highest rated channel it averages only between 1.3 and 1.6% of audience share per week. Boomerang is a new service that was launched only on Digital Satellite less than three months ago.

If so, should requirements apply to all cable and satellite services, or, for example, only to those with a large audience share or over a certain income threshold?

If the Government were to introduce new requirements on cable and satellite services we believe there would have to be some thresholds of audience share or income introduced. We believe that the type of requirements placed on DTT services would seriously affect the viability of many of the 300 plus satellite services licensed in the United Kingdom.

Is there a need to train more subtitlers, signers and audio describers in the future; will technological developments help combat the skills shortage?

We believe the issue of skill shortages is one that will principally need to be faced by the contractors who provide these services to the broadcasting industry. It seems likely as the demand rises for these services and many companies seek exclusivity – particularly among signers – then skill shortages may arise.

We are not aware of any technological developments that would combat skills shortages in this area. Turner Broadcasting considered the use of a computer generated animated signer for its Cartoon Network service, but as well as being technically impossible at the time, this option was ruled out by the ITC in its guidelines on standards for signing.