

# **Ofcom Consultation on Proposed Improvements to EPG Accessibility for People with Visual Impairments**

## **YouView Response to Ofcom**

**October 2015**

# Executive summary

YouView welcomes the opportunity to respond to Ofcom's consultation on proposed improvements to EPG accessibility for people with visual impairments ("**Consultation**").

YouView was created to enable the evolution of free to air television in the UK. It is an open platform for content providers and consumers can connect a YouView device via any UK internet service provider. Devices are offered by BT and Talk Talk as part of a phone, broadband and TV package or are available for a one off cost from retailers.

YouView TV Limited does not own or retail content, produce devices or enter into contracts with the end consumer. Instead, it enables these relationships on behalf of its partners, which include content owners, ISPs, device manufacturers and retailers.

YouView is currently the UK's fastest growing TV platform, driven by the investment made in subsidised equipment by BT and Talk Talk, underpinned by the range of content it enables, the fact that it is free at the point of use (unless a consumer decides to pay for additional services) and its ease of use and set up.

YouView has had a positive impact on the UK digital TV market, providing the core free to air DTT audience with an easy upgrade path from Freeview.

In the following pages YouView has set out its answers to the questions posed by Ofcom in the Consultation.

Please be advised that certain elements of this response ("**Response**") are confidential and as such are set out in the confidential annex (Annex A). As such we would appreciate Ofcom's acknowledgement to treat these aspects of the Response as confidential.

We are happy to elaborate on any points contained within the Response.

# 1. YouView Accessibility Development Strategy

## Context

- 1.1 At launch YouView delivered to its consumers a range of accessibility services and features including:
  - **Access Services:** Support subtitles for broadcast, VOD and other off-schedule content; audio description for broadcast, VOD and other off-schedule content; “On Demand” area for available signed content; remote control buttons for subtitles and audio description, as well as sign-posting in the user interface.
  - **Accessibility Features:** Screen typeface (FS ME font) to ensure the most legible UI possible (type face was developed with BBC and Mencap); basic zoom functionality.
- 1.2 Post-launch, YouView, in collaboration with the BBC, wanted to deliver a set of product improvements to achieve its aim of becoming a leading accessibility platform in the UK.
- 1.3 To understand user needs, set product requirements and to validate its approach and designs, YouView engaged with key industry organisations, including RNIB, British Dyslexia Association, British Telecommunications plc (BT), BBC and Scope. YouView also conducted additional user testing through the Digital Accessibility Centre.

## Accessibility product strategy

- 1.4 YouView's post-launch accessibility strategy aimed to deliver enhancements that would deliver immediate user benefit to a range of groups with accessibility needs. Working in collaboration with the BBC, the following deliverables were included.

User Benefit	Deliverable
<b>Improve zoom to allow visually impaired users to browse the UI whilst still in a zoomed state</b>	<i>Additional functionality to enable interaction with UI when in zoom</i>
<b>Ability to change the colour scheme of the YouView UI for users with colour perception issues or who are visually impaired</b>	<i>Setting for alternative high visibility colour scheme</i>
<b>Ability to remove moving images when the UI is invoked to allow users with ADHD to more easily navigate YouView</b>	<i>Setting to turn off moving images (keep audio) when UI invoked</i>
<b>An accessible YouView companion application for smartphones for blind and visually impaired users which would offer the following:</b> <ul style="list-style-type: none"> <li>• High visibility interface</li> <li>• Enable user to complete high-value end-to-end journeys without need for standard remote control</li> <li>• TTS-enabled via app integrating with mobile platform screen-reader functionality e.g. VoiceOver for iOS</li> </ul>	<i>Accessible YouView App: Delivering 'discover-to-play' audible user journeys</i>
<b>Support ability for an intermediate device displaying an 'onscreen keyboard or RCU' to work with switch devices to control YouView box:</b> <ul style="list-style-type: none"> <li>• This is likely to be through the publication of an API or specification to emulate RCU key presses</li> </ul>	<i>Enable third party device to emulate YouView RCU key presses, supporting an onscreen keyboard / RCU for use with Switch device</i>
<b>Support for the most commonly used USB-devices that are able to navigate the YouView UI e.g. keyboards, for users with moderate motor skills impairment:</b> <ul style="list-style-type: none"> <li>• RCU controls can be mapped onto keyboard to remove need for RCU</li> </ul>	<i>Enable a USB keyboard to work with YouView device</i>

- 1.5 YouView completed its development of these deliverables for set-top boxes in Q4 2013 and the functionality was made available to manufacturers. YouView develops and manages the YouView mobile application in-house.

## Product & design principles for accessibility

1.6 YouView adopted the following principles to shape this product strategy:

**A. Provide Solutions for a Wide Range of Accessibility Needs:**

- address the accessibility needs of different groups from the visually and audibly impaired through to those with cognitive and motor skills impairment;

**B. Design these Solutions Through on-going Collaboration with Experts at the Relevant Organisations:**

- blind and visually impaired (RNIB);
- deaf and hearing impaired (RNID);
- physically disabled (Scope);
- motor skills impaired (and cognitive disability) (Scope); and
- learning, cognitive and developmental disorders (e.g. the British Dyslexic Association);

**C. Adopt a Companion Screen-focused Approach, Delivering Access for a Wider Group of Accessibility Needs in a Shorter Timeframe:**

- most cost and time efficient approach;
- utilise existing development on mobile platforms to deliver better accessibility for blind, partially sighted and users with motor skills impairment;
- develop around devices, or software, that users may already be using in home e.g. Grid2 software on PCs for use with Switch devices; and
- YouView will lead delivery, as opposed to supporting a third party, to ensure high quality end-to-end journeys;

**D. Update and Enhance the Existing YouView Device UI as Appropriate to Make it as Accessible as Possible, while Incorporating Accessibility as a Design Principle for all Future Development:**

- e.g. ensure the UI can be made as legible as possible, review error messages that block journeys and so on; and
- ensuring that any additions must continue to use the FS ME font to deliver the most legible UI possible.

## YouView accessibility features compared with other platforms

- 1.7 Overall, the various features that YouView has now invested in incorporating are at least comparable to and in some cases exceed such functionality of other TV platforms in the UK.
- 1.8 Ofcom has set out at Figure 1, section 2 of the Consultation an assessment of YouView's EPG accessibility features, comparative to its competition. This does not include a comparative assessment of all accessibility features.
- 1.9 YouView's own comparative assessment against its accessibility product strategy is set out below (based on comparative benchmarking carried out in October 2015).

Features	YouView	Sky	Virgin Media	Freesat	Samsung TV	Panasonic TV
Subtitles and AD	✓	✓	✓	✓	✓	✓
Alternative high contrast UI	✓	✓	✓	x	✓	x
Text to speech	✓ 2nd screen app	✓ 2nd screen app <i>Sky Talker discontinued</i> <sup>1</sup>	✓ 2nd screen app	x	✓ Depending on TV model <sup>2</sup>	✓ Depending on TV model <sup>3</sup>
Accessible companion app	✓	✓	✓	<sup>5</sup> x	<sup>5</sup> x	<sup>5</sup> x
Accessible font	✓	?	?	?	?	?
Zoom	✓	x	x	x	✓	<sup>4</sup> x
Alternate UI to increase legibility	✓	✓	✓	x	✓	x
On-screen keyboard for use with switch or a mobile application with TTS keyboard	✓	✓	✓	✓	✓	✓
Highlight or list separately programmes with access services	Partial Available for OD content only	✓	x	x	x	<sup>4</sup> x

<sup>1</sup> See <http://www.rnib.org.uk/information-everyday-living-home-and-leisure-television-radio-and-film/television>

<sup>2</sup> Currently available on limited Samsung TV Models, including UE65HU8500TXXU

<sup>3</sup> 2012 & 2013 Panasonic models approved by RNIB. Subsequent models not tested by RNIB - TTS not supported within TV Guide on 2015 Panasonic Freeview Play TVs. See <http://www.rnib.org.uk/information-everyday-living-home-and-leisure-television-radio-and-film/television>.

<sup>4</sup> Tested using 2015 Panasonic CX680 series Freeview Play TV

<sup>5</sup> App not designed for use with Text to Speech screen readers

## User testing

- 1.10 YouView worked with the RNIB and Scope to carry out some user testing in relation to the product strategy deliverables in October 2013. Visually impaired trialists for the RNIB conducted reviews of the box itself, with the inclusion of the alternative high contrast (or high visibility) user interface, and also for the YouView Text to Speech app. The reviews were positive, and also included helpful feedback where further improvements could be made, many of which were included in the final software upgrade of 2013.

*"Generally speaking this box has many great features many of which can be found on other subscription boxes. In terms of accessibility, it has the potential to be a cut above the rest if the zoom feature was fixed particularly and a few minor changes to the positioning of content as stated above. Having said that, I think the high contrast option is worth its weight in gold and will be upgrading my current BT Vision + box to this."*

*Reviewer with Aniridia, October 2013*

- 1.11 Scope has also tested the effectiveness of the Grid 2 software implementation for YouView. This allows those with motor skills disabilities to control the YouView box via a different access devices. Working with students at Beaumont College, Scope tested the effectiveness of YouView's Grid2 implementation with 4 different access methods –touchscreens, switch devices, a head mouse and a joystick. When asked if they could see themselves using the YouView grid at home, responses included:

*"Yes, I can do it independently, I don't have to shout anyone to come and help me",*

*"Yes because it would make me more independent",*

*"Yes it's easier than a remote".*

- 1.12 YouView conducted further user testing with the Digital Accessibility Centre in November 2013 to determine the accessibility levels of YouView's new accessibility functionality. Feedback was gathered from ten testers with a range of disabilities in order to assess the: (i) newly updated high contrast option; (ii) zoom feature; and (iii) jumbo keyboard. The YouView mobile app on iOS and Android was also assessed.

- 1.13 Feedback in relation to these features can be summarised as follows:

(a) Mobile User App:

- The mobile app was well received by the majority of users. However testing suggested areas for improvement with regards to button labelling and ease of navigation around the main menu, both of which have subsequently been addressed.
- The users felt that the addition of the mobile app in iOS and Android greatly benefitted the blind community, as a user could now interact to remote record, and could hear the Programme Guide via audio on a native device.

- Users did note that the addition of voice in the EPG would also be useful.
- Carly, who is blind, commented on the good use of navigation on the “Now and Next” feature. She was very impressed at the ability to have the programme guide read out to her.

(b) Alternative High Contrast User Interface:

- The high contrast option was very well received by users with low vision, dyslexia and with colour blindness.
- Testers found that switching to high contrast mode not only addressed any usability issues with the standard EPG (e.g. due to white text on blue background) but also found that the addition of the sharply contrasting white outline on the EPG made it much easier to understand where the cursor was located.
- Joy, a dyslexic and colour blind tester commented on how easily she could navigate around the Guide.

(c) Zoom:

- The ability to zoom on a TV interface was noted as a unique feature of the YouView offering.
- Users felt that zoom was particularly beneficial where they had prior knowledge of the features and of the overall set-up. However, once familiar, users were quite efficient at navigating and exploiting this feature.
- Ziad, a low vision tester commented that zoom would be a great feature for most users, however due to his limited sight, he felt he would derive greater benefit from audio feedback in the channel guide.

(d) USB Keyboard:

- The USB keyboard was perceived as a welcome addition for both mobility-impaired and for low vision users, providing an opportunity for mobility-impaired users to interact with and control the TV interface.
- Users felt that the keyboard would benefit from the addition of familiar icons associated with the UI. Users also indicated that they would be interested in using a wireless version.

1.14 Although we do not collect statistics concerning uptake of new features released, we are encouraged by the above comments.



## **Future Accessibility Roadmap**

### **Integrated TTS**

- 1.15 Please see our comments at section 2 below regarding integrated TTS.

### **Audio Feedback**

- 1.16 YouView has been working with manufacturers to enable Audio Feedback across YouView devices to the specification as set by the Help Scheme e.g. an audio signal is released to confirm key presses on the remote control unit. This was delivered across the YouView device base in 2014.

### **Second Screen**

- 1.18 YouView plans to continue to develop its mobile application as this is our current route to developing further accessibility features.

### **Consumer and Industry Feedback**

- 1.19 YouView is open to feedback on ways to further refine our accessibility features for the benefit of our users. We maintain a forum where users are encouraged to make comments on the functionality of our platform. Feedback has included requests for increased content containing subtitles and AD (and we continue to engage with content providers in this regard) and praise for YouView's instructional videos which explain the accessibility features available on the platform.
- 1.20 We also have good on-going relationships with key industry organisations and we welcome feedback from these organisations.

## 2. YouView response to Ofcom's Consultation questions

***Q1. Do you agree with the range of potential benefits of TTS for TV viewers with visual impairments described in paragraph 3.5? Do you have any information that would help to quantify the potential benefits?***

- 2.1 YouView agrees that TTS is a helpful feature and would help make it easier for blind and visually-impaired people to use EPGs for the same purposes as sighted people. Consistent with the original ambition for the platform as set out by the BBC Trust, YouView has adopted certain accessibility features which we have extended in consultation with the RNIB.

***Q2. Do you have any information that would help to quantify the additional costs that EPG providers and TV receiver manufacturers would face in providing TTS capability in multi-functional TV receivers?***

- 2.2 YouView agrees that, generally speaking, there are no insuperable technological barriers to providing TTS for EPGs intended for use in multi-functional TV receivers. However, the issue for YouView is one of resource capability, coupled with overall cost.
- 2.3 YouView maintains that there are technical, commercial and product design related obstacles to YouView developing integrated TTS within its user interface.
- 2.4 YouView has engaged with device manufacturers to explore the challenges associated with the capability to mix a local audio source, which could also mix-in locally generated speech audio. However, for YouView to enable this, technical work, a sound commercial rationale and product/user experience would be required, as follows:

### **From a technical perspective:**

- YouView would need time to conduct a feasibility study designed to identify the possible solutions for speech synthesis on the device and to determine their suitability for YouView. Such a study would include an analysis of the following:
  - the memory and processing power required of devices, with particular challenges for early generation YouView STBs which have very small amounts of memory;
  - the output audio format in relation to the local mix capability being developed (as above);
  - how YouView might surface this capability to the YouView UI and then to content provider applications which are not part of the YouView UI, but which would also need to be integrated with TTS to deliver a consistent and unbroken user journey - e.g. locating an on demand episode of Eastenders in YouView search, loading it and then watching and controlling it from within the BBC iPlayer application;

- the quality/suitability of the speech itself as provided by available voice synthesis products; and
  - if YouView deemed third party providers to be unsuitable, YouView's own capability to provide voice synthesis.
- YouView would then need time to develop and to integrate a solution once identified, which would include:
- full product, interaction and visual design of the integration across the entire user interface, ideally including costs to all on demand content providers to also commit to integrating/developing the same solution, to ensure a full and consistent user experience;
  - solution dependent technical development;
  - full testing and integration, including a consideration of the impact on the audio-mixing stack; and
  - user testing.

**The following arises from a business/commercial perspective:**

- the size of the opportunity (ROI) of investing in TTS, would need to be agreed by all seven of the venture's shareholders. YouView would need to demonstrate that the implementation of such a feature was cost-effective;
- the opportunity cost of committing this into delivery (cost versus uptake) for YouView and its OEMs;
- whether any other YouView roadmap features are impacted in terms of deliverability by adding an on-device capability; and
- once a solution had been identified, further commercial issues would need to be resolved relating to who would pay any licencing fees, per device royalty (if any) etc.

**The following arises from a product perspective:**

- the benefit as an alternative to TTS via second-screen;
- the benefit if only the YouView UI (and not content provider apps within the YouView UI) was TTS enabled and if this was in fact the case, the resulting impact on overall optimisation of the UI; and
- An analysis of the UI to identify the level of change required and to ensure the technology is compatible, which would involve a review of the navigational paradigms to exploit the speech synthesis capability across the YouView UI (level of work/re-design required and when this could be done in conjunction with the rest of the venture's technology roadmap).

2.5 We still maintain that providing a full speech-enabled receiver would take longer and would be more costly to develop than a second screen companion app and we acknowledge Ofcom's observations at paragraph A3.17 of the Consultation, that there are divergent views on the extent to which companion apps might meet the needs of older people. However, whilst we acknowledge the wider benefits of TTS, our research shows that for the visually impaired, the second screen companion app provides useful benefits.

- 2.6 Technology is likely to develop in ways that are not always anticipated. It may be that, even amongst the ageing population, the uptake of smart phones fast out-paces current predictions and that similarly, more and more technology is developed to reside within the phone itself.
- 2.7 We appreciate that certain internet-enabled TVs have already introduced TTS functionality and that as a result, Ofcom's view is that EPG providers should also be compelled to introduce such functionality. However, such TV manufacturers are by virtue of having "end to end" control over the manufacturing and distribution of their devices, able to take the unilateral decision to develop and deploy this functionality. YouView, as an open platform, operating at a horizontal level in the market, is can influence but not drive end to end outcomes.

***Q3. Do you agree that the EPG Code should be amended as proposed in Annex 5 to require that EPG providers use their best endeavours to secure that TTS-enabled EPGs are incorporated in multi-functional TV receivers?***

- 2.8 YouView does not believe that it is appropriate for Ofcom to place a best endeavours obligation on EPG providers. This would require YouView to subjugate any or all of its commercial interests (and those of its shareholders) in order to secure the required functionality. In practice this could mean that YouView would have to deprioritise the development and/or launch of other roadmap features and further, YouView would have to bear the cost of securing this functionality in the event that YouView failed to agree that this could be passed on to/shared with third parties.
- 2.9 We do not believe that it is appropriate for Ofcom to mandate this requirement in the EPG code. This is a fast-moving market place where technology is constantly evolving and in this context, intervention by a regulator does not seem appropriate. The fact that the market has not yet developed, such that TTS has been fully adopted, is in itself an indication that such functionality is not currently easy or cost-efficient to develop and/or implement. Ofcom makes the point at paragraph 3.56 of the Consultation that as the cost of providing accessibility features falls due to economies of scale, the use of necessary components in TV receivers will become more widespread. YouView believes that in light of this, it is more appropriate for Ofcom to allow market dynamics to influence and encourage development in this area, rather than mandating the requirement as part of the EPG Code. As we have pointed out at paragraph 1.4 above, YouView's approach is to deliver enhancements that benefit its whole user base, which includes a range of groups with accessibility needs.
- 2.10 Ofcom refers to EPG providers using their "commercial leverage" with manufacturers of TV receivers to secure the implementation of the relevant accessibility features. However, YouView's view is that a requirement to use "best endeavours" actually removes any commercial leverage that any EPG provider might have with a third party in this regard. Instead, the EPG provider is essentially precluded from entering into a genuine commercial negotiation, as commercial interests would be deemed to be irrelevant when meeting a best endeavours obligation. The EPG provider could effectively be "held to ransom" in the event that a manufacturer was unwilling to negotiate on a reasonable basis in respect of (for example) timeframe and cost of including TTS functionality. In this circumstance, YouView (using its best endeavours

as mandated by the EPG Code) would be required to agree to such terms in order to meet this stricter test, as opposed to reasonable endeavours, which would permit EPG providers to take part in genuine and reasonable negotiations with manufacturers. A commitment to meet best endeavours seems to YouView to be a wholly disproportionate measure. We note that whilst we may have a degree of influence over those technical specifications which we provide to manufacturers, this does not necessarily extend to the negotiations around cost of development and overall timeframes for delivery of the components of the hardware.

- 2.11 Ninety five percent of YouView's devices are specified and funded by BT and Talk Talk and the product features of such devices require the agreement of the ISPs. Further, it is BT and Talk Talk who maintain the necessary relationship with STB manufacturers and who would be responsible for ensuring the manufacture of any mandated features. Placing an obligation on the EPG provider would most likely result in a complicated set of negotiations in respect of mandated features that the ISPs may not wish to introduce at that particular time.
- 2.12 We do not agree with Ofcom's assertion that a commitment to meet best endeavours is a "less prescriptive approach" than a statutory obligation. In effect, best endeavours would place an equivalent, prescriptive obligation on EPG licensees, as in YouView's case, it would not be able to have a genuine commercial dialogue with third parties, but instead would be required to subjugate its commercial interests in order to meet the obligation to introduce TTS (e.g. if manufacturers refused to meet reasonable cost considerations). YouView would then have no choice but to agree to such terms if this was the only issue preventing the development of the feature.
- 2.13 It is YouView's view that if Ofcom is committed to mandating a requirement, then it should be a commitment to meet reasonable endeavours. Such a commitment would still ensure that Ofcom were able to fulfil its duty under section 10(1) of the Act as this would still provide the requisite "encouragement" to providers. Reasonable endeavours would arguably prevent EPG licensees from relying on the "inconvenience" factor as a reason for failing to take steps to implement required accessibility features. However, it would permit licensees to take the view that they were not yet in a position to prioritise TTS ahead of other accessibility features that would address the needs of a wider market, or indeed other roadmap features generally.

***Q4. Do you have any information that would help to quantify the additional costs that EPG providers and TV receiver manufacturers would face in providing the ability to highlight or list separately programmes with audio description and signing in multi-functional TV receivers?***

- 2.14 YouView is investigating the steps necessary to introduce this feature but does not have any information as to costs at this stage.

***Q5. Do you agree that the EPG Code should be amended as proposed in Annex 5 to require that EPG providers use their best endeavours to secure that EPGs in multi-functional TV receivers enable users to highlight or list separately programmes with (a) audio description and (b) signing?***

2.15 YouView does not believe that it is appropriate for Ofcom to place a best endeavours obligation on EPG providers to secure the provision of any functionality, for the reasons outlined in the response to Q3 above.

***Q6. Do you have any information that would help to quantify the additional costs that EPG providers and TV receiver manufacturers would face in providing the ability to enlarge text or magnify portions of the EPG in multi-functional TV receivers?***

2.16 YouView has already implemented a zoom feature and this was deployed as part of a broader feature set, so YouView would not face any “additional costs” in this regard. Isolating the specific costs of delivering this particular functionality would require significant work on YouView’s part. We would be happy to conduct the necessary analysis if Ofcom feels that this would be beneficial.

***Q7. Do you agree that the EPG Code should be amended as proposed in Annex 5 to require that EPG providers use their best endeavours to secure that EPGs in multi-functional TV receivers enable users to adjust the display of EPG information so that it can be magnified or the text enlarged.***

2.17 YouView does not believe that it is appropriate for Ofcom to place a best endeavours obligation on EPG providers to secure the provision of any functionality, for the reasons outlined in the response to Q3 above.

***Q8. Do you have any information that would help to quantify the additional costs that EPG providers and TV receiver manufacturers would face in offering the ability to select a high contrast display of the EPG in multi-functional TV receivers?***

2.18 YouView is investigating the steps necessary to introduce this feature but does not have any information as to costs at this stage.

***Q9. Do you agree that the EPG Code should be amended as proposed in Annex 5 to require that EPG providers use their best endeavours to secure that EPGs in multi-functional TV receivers enable users to have the option of switching to high contrast displays? Do you agree that a minimum contrast ratio of 7:1 would be appropriate for high contrast displays?***

2.19 YouView does not believe that it is appropriate for Ofcom to place a best endeavours obligation on EPG providers to secure the provision of any functionality, for the reasons outlined in the response to Q3 above.

2.20 YouView’s high contract display offers a contrast ratio of 21:1<sup>1</sup>, which is the highest contrast possible. We developed this through testing different contrast options with users, with the help of the RNIB.

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<sup>1</sup> 21:1 when the Guide is ‘unselected’. When an item on the Guide is ‘selected’ the ratio becomes 16:1. The ratios have been obtained through using the Paciello Group’s contrast analyser: <https://www.paciellogroup.com/resources/contrastanalyser/>

***Q10. Do you agree that for the time being, the EPG Code should be amended as proposed in Annex 5 to require that EPG providers use their best endeavours to secure that the additional accessibility features (i.e. text-to-speech, filtering or highlighting, magnification and high contrast displays) are incorporated in EPGs for multi-functional TV receivers?***

2.21 YouView does not believe that it is appropriate for Ofcom to place a best endeavours obligation on EPG providers to secure the provision of any functionality, for the reasons outlined in the response to Q3 above.

***Q.11 Do you agree that EPG providers should be required to use their best endeavours to secure that specified accessibility features are incorporated in multi-functional TV receivers?***

2.22 YouView does not believe that it is appropriate for Ofcom to place a best endeavours obligation on EPG providers to secure the provision of any functionality, for the reasons outlined in the response to Q3 above.

***Q.12 Do you agree that, absent regulation, the proposed accessibility features might not be included in all new multi-functional TV receivers whose core specifications are determined by the EPG provider or otherwise agreed between the EPG provider and the manufacturer?***

2.23 YouView maintains the position that it is more appropriate for Ofcom to allow market dynamics to influence and encourage development in this area, rather than mandating the requirement as part of the EPG Code.

***Q.13 Do you agree that the EPG Code should be amended as shown in Annex 5?***

2.24 YouView agrees with certain of the suggested changes and these have been set out in Annex B of the Response.

## **Annex B**

### **Proposed Changes to the EPG Code of Practice**

- B1.1 YouView agrees with the suggested changes as outlined in section 6A of Annex 5 of the Consultation.
- B1.2 YouView does not agree with the new paragraph set out at section 6B of Annex 5 of the Consultation and in particular, with the requirement for EPG providers to use their best endeavours to secure the functionality listed at sub-paragraphs a) to d) inclusive.
- B1.3 YouView agrees with the suggested changes as outlined in section 6C of Annex 5 of the Consultation.
- B1.4 YouView agrees with the suggested changes as outlined in section 7 of Annex 5 of the Consultation.
- B1.5 Given that YouView does not agree with the new paragraph set out at section 6B, our assumption is that the suggested changes as set out at paragraphs 8 to 10 inclusive would no longer be relevant.
- B1.6 YouView agrees with the suggested changes as outlined in sections 11 to 13 inclusive of Annex 5 of the Consultation.