

## **SATELLITE & CABLE BROADCASTERS' GROUP**

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### **Access to satellite and cable for people with sensory impairments**

The growth of satellite and cable broadcasting has also allowed for growth in access to programmes for people with disabilities. All satellite and cable channels wish to see improved access for people with disabilities and to increase the number of service users. We would have preferred to see this continue on a voluntary, not statutory, basis given our status as Tier One broadcasters and the current level of access already provided across many channels. However, moving forward our concerns lie with the technical and economic practicalities of delivering the requirements as set out on the face of the Bill.

In an SCBG members' survey in 2001 it was found that deaf and hard of hearing viewers benefited from over 97,000 hours of subtitled programmes on satellite and cable each year. This is more than double the number of hours of all programming across the five analogue terrestrial channels.

**If the level of this service is to continue to grow then we believe that this is best achieved through the current voluntary arrangements. New across-the-board mandatory targets would cause significant problems for many channels which ultimately may impact on viewer choice.**

The satellite and cable sector has made huge investments in the development of digital television; in many cases with low levels of return or even liquidation. For example, all satellite and cable channels that chose to broadcast on the now-defunct ITV Digital platform were required to make major investments in subtitling, signing and audio description with little or no return.

With the advent of digital television many broadcasters have increased their number of channels to create a brand "area" in order to preserve audience share. This fragmentation of output has helped in some cases to protect revenues but it has also increased costs to broadcasters leaving little scope for additional expenditure on services.

The SCBG strongly believes that a mandatory approach would be inappropriate because of a number of important differences in the characteristics of the satellite and cable sector and traditional broadcasters.

Satellite and cable broadcasters:

- *operate in a different economic environment to the terrestrial broadcasters in that every subscriber or viewer has to be attracted through their own marketing efforts*
- *do not have the benefits enjoyed by the public service broadcasters (PSBs) of universal access to scarce spectrum*

- *provide niche services which are watched in far fewer homes than the PSBs and which regularly achieve 0.1% or less of total UK audience share*
- *and operate with very low programme budgets per programme hour, in comparison with the PSBs.*

The Government proposes that in future all satellite and cable channels will be required to meet subtitling, signing and audio description targets.

- **These proposals have not been adequately assessed for their impact on satellite and cable channels. The proposals in the Communications Bill must not be approved before the true impact is known.**
- **The Bill will allow OFCOM to exempt certain categories of channels on a case by case basis, such as new or niche channels which have not yet built up audience share or revenue, but until the exemption criteria are known satellite and cable broadcasters have no option but to oppose this measure.**
- **Many international companies have located their European operations in this country. Indeed the majority of services licensed in the UK are not aimed at domestic audiences and any requirements to provide access services on these channels will raise enormous technical and logistical issues. The Bill should contain a specific exemption for all channels wholly or mainly aimed at overseas markets.**
- **Improved access for people with disabilities is important not only for the communications sector but also for society as a whole. However, in order to achieve this and to ensure that these requirements are delivered in a coordinated and effective way we believe the Government needs to provide direct support to the sector.**