Introduction

S4C welcomes the opportunity to respond to the BBC’s draft Distribution Policy (the ‘draft Policy’).

S4C is a full-service channel which provides a wide range of content entirely in the Welsh language. Since 2014, all S4C’s television content has been made available on the iPlayer for live streaming and on demand. This has enabled S4C content to be enjoyed on a wide range of devices and has resulted in a significant increase in the viewing of our content. This development was possible under the unique partnership created between S4C and the BBC as a result of most of S4C’s funding coming from the licence fee.

S4C also has its own player Clic, through which all of S4C’s television content, plus additional content, is available for live streaming and on demand, via desktop and mobile apps. S4C also makes short form content available on Facebook and YouTube and has created a separate brand Hansh – a short form online service targeting 16 – 34 year olds. We also offer content for young children through our CywTiwb online service. All the content provided via our online services is in the Welsh language.

In recent years, we have experienced significant growth in the consumption of Welsh language content across our online services.

The draft Policy

S4C believes that the principles set out in the draft Policy are reasonable and appropriate for a public service broadcaster. We wish to raise additional considerations from the perspective of audiences for Welsh language content.

As is evident from the draft Policy, distribution these days is about much more than broadcasting television programmes in linear form. It also includes functionality, searchability and audience interface.

The draft Policy refers to the BBC’s duty to promote technological innovation that supports the promotion of the Public Purposes. One of these purposes is to reflect, represent and serve the diverse communities of all of the United Kingdom’s nations and regions.

We would ask that the BBC, as it innovates and develops new functionality, consider doing so in a way which enables Welsh language audiences to access and enjoy new functionality and enhancements in the language of their choice. The Partnership Agreement between the BBC and S4C confirms the provision of S4C’s content on the BBC iPlayer for the duration of the BBC Charter and states that this ‘shall enable S4C to reach new audiences and benefit from new functionality as the iPlayer develops’. We believe that audiences for Welsh language content should not be disadvantaged or left behind: they should be able to enjoy Welsh language content as easily as they enjoy English content, and with the same up-to-date technology.

Examples for consideration may include the following:

- So far as it is within the BBC’s control, providing users with the option to select a Welsh language interface to access content.
- Where Welsh language content has Welsh and English subtitles, providing the functionality for users to be able to access subtitles in either language.

- Developing algorithms used to create recommendations in a way that takes into account the language in which users have chosen to view content.

- Developing voice recognition technology which recognises the Welsh language, including the pronunciation of Welsh programme names.

The importance of securing a place for the Welsh language in such developments was highlighted in the recently published independent review of S4C commissioned by DCMS and conducted by Euryn Ogwen Williams:

**“Using Welsh in voice recognition”**

Voice recognition is becoming increasingly prevalent in the broadcast and digital content space. Content providers and platforms like Amazon, Google, Apple, Microsoft and Samsung have embedded virtual assistants to help users navigate their systems. As this technology embeds, consumers will come to expect voice recognition as the norm for navigation.

As part of the review I spoke to a group of Welsh speaking teenagers about how they consume content. When asked which language they would expect to use in 10 years’ time to find content they unanimously said “Welsh, of course”. This new generation of Welsh speakers have expectations about being able to engage with content in both Welsh and English.

Welsh is already available as a written language option on Apple, Google and Microsoft devices and applications, but steps must be taken to ensure that all platforms and providers offer a Welsh language option. S4C should work closely with the Welsh Government and others to identify opportunities for Welsh to become one of the languages of choice in voice recognition. Action should be taken now to ensure that Welsh is not left behind as technology evolves.

We appreciate that some of these initiatives will require wider collaboration with industry and academic and government partners, and S4C would be willing to be part of such initiatives where possible. As part of our ongoing partnership with the BBC, we would welcome early visibility of technological developments and the opportunity to discuss whether dual-language functionality would be appropriate, as it may be easier to incorporate such functionality from the outset rather than undertake a retrofit exercise.

The BBC also has its own Welsh language services of course, including radio and online, and we would expect that offering such technological innovations in the Welsh language would also benefit the audiences for these services.

*S4C, 9 April 2018*