



Digital UK
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Consultation on revised rules on the allocation of LCNs to public service channels

We write in response to your recent consultation on the proposed changes to your LCNs. This was on the back of Ofcom's July 2019 statement on PSB prominence and changes to the EPG Code.

As BT set out in its response to that Ofcom statement, YouView already complies with this proposed wording, so no changes would have to be implemented on the YouView EPG. We, therefore, have no objections to the proposed approach being taken here by Digital UK.

We do, however, want to take this opportunity to reiterate where improvements to the wider EPG system can and should be considered. There are three areas, in particular, where the EPG compact can be strengthened in the context of rapid changes in viewing habits and preferences. These are:

- While we support regulatory protection for the PSBs with regards to prominence, this should come with an appropriate supply obligation such as "must offer";
- There should be a move away from the current framework based on 'traditional' channel listing and methodologies and towards one which is technology neutral. This contrasts with the existing Digital UK approach which distinguishes between different transmission technologies, rather than grouping all Ofcom-licensed channels by genre; and
- Extension of regulatory obligations, more generally, should be technology neutral and apply equally to all platforms which carry PSB content.

We look forward to further discussions on this important issue over the coming months with a view to securing an EPG which balances the needs of PSBs with the changing nature of modern TV consumption.

BT