

Digital UK

Reorganisation of the DTT LCN Listing & Changes to Digital UKs LCN Policy

Consultation Feedback

Consultation Questions:-

- 1) Do you believe that Option A would be a suitable new LCN listing structure for the DTT platform? **No**
- 2) Do you believe that Option B would be a suitable new LCN listing structure for the DTT platform? **No**
- 3) Do you have a preference for one option over the other? **No**
- 4) Do you have any other comments on Digital UK's proposed changes to the LCN listing? **Yes, as follows:-**

As part of Digital UK's executive summary to this consultation, you state that you aim to "make it easy for viewers and listeners to discover content through simple navigation, to protect consumers from potential harm, and to be flexible in the face of changing market conditions". We find it difficult to see how splitting the "General Entertainment" genre into two sections (LCN's 1-99 & 140-199) meets Digital UK's aim to make it easy for viewers. Surely it would be easier if all General Entertainment genre channels were listed consecutively without a break (i.e. from LCN 1-159). Further why would Digital UK set out a separate area entitled "SD simulcast"? It makes more sense to have each simulcast channel, located in the relevant Genre area – i.e. if it's a simulcast of a General Entertainment channel, then it should logically sit within the General Entertainment area, likewise a Children's simulcast channel should be located in the Children's area where children are more likely to find it. In our view we feel that the more logical way to set out the LCN listing would be as follows, in the order listed below:-

- a) All General Entertainment Channels (including simulcast versions)
- b) All Children's channels (including simulcast versions)
- c) All News channels (including simulcast versions)
- d) All HD channels (including simulcast versions)
- e) IP Delivered Services (which have a dedicated LCN for each service)
- f) Streamed Services MHEG-ICS (where numerous services sit behind one portal\LCN)
- g) Interactive Services (Red Button)
- h) Text

- i) **Freeview Information**
- j) **Adult**
- k) **Radio**
- l) **Testing area**
- m) **Reserved for manufacturer use**

Completely remove “SD simulcast area”

- 5) Do you agree with Digital UK’s proposed approach to the timing of any changes? **Yes**
- 6) Do you agree with Digital UK’s proposals regarding minimum broadcast hours? **Yes**
- 7) Do you agree with Digital UK’s proposed new launch process and timings? **Yes**
- 8) Do you agree with Digital UK’s proposed approach to LCN sharing? **Yes**
- 9) Do you agree with Digital UK’s definition of ‘common control’? **Yes**
- 10) Do you agree with Digital UK’s proposal regarding the ‘public service rule’? **Yes**
- 11) Do you agree with Digital UK’s proposal regarding the ‘associated channels rule’? **Yes**
- 12) We would welcome stakeholder’s views on the options for Stage 3 of the vacated LCN rules?
We do not believe that the “transactional model” is suitable and thus should be avoided. This leaves option ‘A’ “beauty contest” option and\or the existing method of “shuffle-up” moves.
- 13) Do you agree with Digital UK’s proposed timeline for channels to complete an LCN move following an allocation under the vacated channel rules? **Yes**
- 14) Do you agree with Digital UK’s proposals to amend the rules around channel providers reordering channels within their channel portfolio? **Yes**
- 15) We welcome stakeholder views on whether public service channels should be permitted to reorder the channels they control within a genre? **We do not believe PSB’s should be permitted to reorder their channels.**
- 16) Do you agree with Digital UK’s proposals around channels changing their name and\or content? **Yes**
- 17) Do you agree with Digital UK’s proposal to retain but re-word the “shuffle-up” rule? **Yes**
- 18) Do you agree with Digital UK’s proposals around the treatment of streamed services? **Yes**

19) Do you have any comments on the proposed new wording and structure of the LCN Policy, aside from issues you have mentioned in response to other consultation questions? **No.**