



Synapse

Synapse TV Ltd

Response to DUK Consultation on LCN Allocation and LCN Policy

Background and LCN Genre Policy

Synapse TV is a subsidiary of Strategy & Technology Ltd (S&T). It operates a number of services on Freeview, mostly delivered as Streamed Services that are discovered via LCNs in the Freeview Guide. These services are largely specialist channels but more generic services do exist in our portfolio – in particular relating to a Children’s VOD service, one Adult service and a documentary VOD service. In addition, a Bollywood movie service and a sports VOD channel are expected to go live in the next few months.

The LCN numbers allocated to these services to date have been high, largely in the 200+ range, and not found easily by browsing the guide. The exceptions to this have been the Adult and Children’s services, both in their respective genres rather than in the ‘Technical’ genre.

Future Outlook and Key LCN Policy

Our long term general expectation is that the boundary between broadcast and online delivery of content will become increasingly meaningless to the consumer, especially as consumer equipment is flexible and broadband speed and reliability increases.

We consider that the Genre policy in respect to Streamed Channels is illogical and propose that all channels in the Streamed Services category be re-allocated to a specific genre, as part of the normal list, even if that suggests one or two extra genres. In particular, we have services (in the Vision247 Portal) and in Arise News, that would fall naturally into the ‘News’ genre, and an online Portal containing a range of News (or News and Sport) channels would be found well there.

We have a documentary service, Planet Knowledge, that fits well into General Entertainment, together with the expected BollywoodHD VOD service. If News were transferred from the Vision247 portal, most of these channels, and some individual religious ones, fit into General Entertainment.

So we expect that most LCNs in the Streamed Services category be able to fit into their expected genre, like the Children’s and Adult ones already do. We ask for a revised LCN policy that includes this modification.

Auto-Retune and Promotion

Your figures on auto-retune capability underline an issue we have at the higher LCNs, where people without retuned TVs may miss the services altogether. We think that this is perhaps an explanation for the remarkably low reach of some services which are otherwise attractive. Active promotion of retuning for all services following reconfiguration will therefore be important to Synapse and its customers and we request that we are included in the planning for this and are engaged as part of the process.

Consultation Questions

1. Given the caveat above, Option A seems usable.
2. Given the caveat above, Option B seems usable
3. Of the two we believe that A works better, in that it's harder to get to Adult from Children's. It is also marginal. If you want to hide Adult properly it should go between Testing and Manufacturer Use.
4. We think that the Streaming Services should be absorbed into normal genres and that this should be an important feature of the change.
5. The timing is OK, but we would like to get our new services in place before it happens. It is important to us that DUK, in cooperation with Freeview and the PSBs, signals the change and the requirement to retune TVs to find old and new services as soon as possible after the change, and that this facility persists on the system for a few weeks initially. We believe that the exercise should be repeated, perhaps for a shorter period, every six months or so. This should be combined with significant promotion by Freeview on its website of all the services affected.
6. The minimum broadcast-hours channels should not get priority over full time channels available via streaming. Two hours a day seems a very small amount to hold on to an LCN at a valuable lower LCN number.
7. Launch process seems OK
8. No comment re LCN sharing.
9. No comment
10. I think the PSB rules should apply to the PSB's PSB channels. I don't think most of them now are.
11. OK
12. What's wrong with First Come First Served provided it's a full time service? An auction introduces unnecessary distortions into the Freeview EPG process.
13. OK
14. OK
15. Seems unnecessary if by Public Service Channels you mean BBC1, BBC2, ITV, CH4, CH5. If you also mean all the others run by the Public Service Broadcasters then it seems reasonable to be able to re-order, but given that many of them are named by number, this might end up looking illogical.
16. OK
17. OK
18. As set out above, the assignment of Streamed Services to appropriate genres should be done in all cases. It is illogical to do it where it is really obvious, as in Children's and Adult, but not in other cases. In particular, this applies to News (&Sport) and

General Entertainment. There may be an option to have a Religion and Philosophy Genre. The requirement that supplementary content should be subject to licensing as normal is reasonable.

19. No other comments.

David Cutts
Director
5th January 2017