



**BBC response to Digital UK's consultation :
*Consultation on changes to Digital UK's
LCN Policy, 18 November 2020***

13 January 2021

The BBC is pleased to be able to respond to Digital UK's "*Consultation on changes to Digital UK's LCN Policy*" dated 18 November 2020.

Despite today's rapidly evolving environment of multi-platform media consumption, making sure audiences can easily find trusted linear channels on the EPG remains critical. We know that EPG positioning matters when audiences are looking for something to watch. Indeed, there is a wealth of statistical evidence to show that better EPG positions result in improved channel performance and demotions have a negative impact.

The DTT platform is a highly valued service and is relatively stable compared to its competitive set – that said we believe the platform should be seeking to bring innovation to the platform wherever possible, and in the least disruptive way than enhances the service for viewers. The introduction of CLM features to Freeview Play devices along with the supporting changes and liberalisation that Digital UK are proposing to LCN policy which will enable beneficial change to the DTT EPG listing, should help make concrete the benefits of such innovation.

1. Do you agree with Digital UK's proposed amendments to the LCN Policy, to enable HD/SD substitution for devices that support CLM?

Yes, we support the proposed amendments that will enable HD/SD substitution on equipped devices.

The BBC's consistent aim on all platforms in respect of our linear channels is to make the best quality version of our channels available, complete with all relevant regional content, in the most prominent EPG positions. Consumers would expect better quality HD versions of channels to be made available in the most prominent positions, where those channels are identical simulcasts of the SD variants. In this regard, the BBC has already optimised its channel line-ups on other platforms for those linear channels where fully identical HD simulcasts are available and distributed.

Experience has shown from our approach on other platforms that when we are able to list HD simulcasts in more prominent slots then viewing to those HD services naturally increases. Presently most BBC HD services are listed in the separate HD genre on Freeview devices and measured viewing to the HD variants is notably hampered on Freeview by their reduced discoverability.

As permitted by the relevant wording in the current LCN Policy (version 6.1), the BBC has recently given more prominence to the high definition feeds of our Children's services in the EPG on CLM-enabled devices. Whilst take-up of CLM-enabled devices is currently so low as to not be able to measure effectively any increased consumption to our Children's HD services on the Freeview platform, we expect the numbers of devices in field will grow over time and that consumption to our Children's HD services will consequently increase on Freeview.

With the proposed LCN Policy changes pertinent to CLM-enabled devices, we look forward to being able to start to replicate the 'better quality/more prominent' viewing experience in Freeview homes. This will result in a better and more value-for-money experience for audiences given our continuing investment in HD technologies across the broadcast chain.

In terms of BBC One HD swapping up, we would look to promote the BBC One and BBC Two Nations variants in HD that are already available on DTT. Currently we do not have all the English regional variants of BBC One available in HD – however, we look forward to being able to make them available over time and to list them in slot 1 of the EPG also, whether those channels are delivered via broadcast means or via IP [see response to Q2], resulting in a more prominent and better quality viewing experience to the viewer.

Finally, we note that Digital UK are proposing optionality in terms of the dual listing of HD services in both the HD genre and in the main general entertainment genre, regardless of the delivery method of the HD channel: “The HD version of the channel **may** retain its LCN in the HD area **on devices that support this**, and may therefore appear twice in the listing (except in the case of Children’s and Adult channels)” (*our bolding for emphasis*). The BBC’s preference would be for there not to be any dual listing of the HD services in both the main genre and in the HD genre on Freeview Play CLM devices as we understand that dual listing of services may be counter to what is presently permitted within the D-Book. (That said, in a mixed economy of Freeview HD, Freeview Play non-CLM and Freeview Play CLM-enabled devices, dual listing would effectively cover all bases.) We would ask Digital UK to work with TV manufacturers to consider how listings of HD services could be best supported including on Freeview HD and Freeview Play devices (particularly existing devices without CLM enablement) so as to result in optimal listing outcomes that are both clear and helpful for all Freeview users regardless of whether their device supports CLM or not.

2. Do you agree with Digital UK’s proposed amendments to the LCN Policy, to enable IP fallback channels for devices that support CLM?

Yes, we agree with Digital UK’s proposed amendments and they have the potential to bring a number of benefits.

- We recognise that there is a growing contingent of homes that do not have access to an aerial or satellite dish and enabling IP fallback will provide users with CLM-enabled Freeview Play devices to obtain a broadcast-like channel experience.
- Whilst the three core Freeview multiplexes are receivable by 98.5% of the population, the other national Freeview multiplexes are only distributed to c.90% of the population. Enabling IP fallback for internet-connected devices that support CLM will thus increase the content offer to a gradually increasing number of existing Freeview homes – and it may also lead to higher consideration of Freeview as a suitable content TV proposition in those homes whose areas have suffered and continue to suffer from poor/non-existent multiplex signal coverage.
- We note that the second of the two interim multiplexes operated by Arqiva is expected to close in the next couple of years - this could mean that some channels (including some BBC HD channels) could be left without multiplex capacity for distribution. Enabling IP fallback for HD channels, would provide a means of giving some of those channels back to viewers – we also support the proposal that the means of technical delivery of the channel should not discriminate against the ability of an identical HD simulcast to be listed in the more prominent position in the EPG provided that the viewer experience is not materially

impacted. We would, however, expect some form of warning in place for those viewers on metered broadband packages who might opt-in to the more prominent listing of IP-delivered HD channels that watching such channels over IP could likely involve usage of their broadband data. Digital UK might also specify an ability to suppress certain CLM-enabled features (with the same outcome as on mobile devices whereby player apps on mobile devices can prevent usage of more costly mobile data) – this should, however, not suppress all other CLM features as some (such as alternate listings) will still be particularly important to channel providers.

3. Do you agree with Digital UK's proposed amendments to the LCN Policy, to enable IP-delivered channels for devices that support CLM?

Yes, we agree with the proposed amendments in relation to IP-delivered channels.

Whilst the BBC presently has no plans to launch any IP-only delivered services, the changes that Digital UK are proposing will facilitate the listing and accessibility of these services on the Freeview Play platform. This could result in channel providers making a more compelling content offer available for viewers or make existing services (such as those currently carried within player apps) more accessible by virtue of their being able to be listed in the Freeview Play EPG. We would therefore expect that over time Digital UK is able to offer the ability for channels outside of a Freeview Play player app to be carried and listed within the IP-only channel genre.

Further to the proposals around genre ranges, the BBC would also suggest that following previous work by Digital UK to introduce signposting on the EPG that the most prominent slot of each genre range in the IP numbering channel section be reserved for future innovations. This 'top of genre' slot could, by way of example, be used to provide a genre summary page in a similar way to which LCN 100 has been reserved to provide an aggregated browse function with the Explore Freeview Play app.

In summary, the proposed changes covered in questions 1-3 would provide clear technological and quality benefits to those viewers that have invested significantly in the correctly provisioned equipment. They also protect the existing listing that we know viewers enjoy and appreciate, but help futureproof the platform and its EPG as new delivery methods come into play.

4. Do you agree with Digital UK's proposed amendments to the LCN Policy, to remove restrictions on the number of times channel providers may reorder their LCNs or change the names of their channels?

Whilst the BBC has no plans to make any such changes to its services, we recognise that providing flexibility to channel providers, in terms of reordering their LCNs and channel-renaming, could lead to a more dynamic, responsive and innovative content offering to viewers. We would, however, warn against a situation where channels are frequently reordered and renamed in such a way as to

cause confusion for viewers and require persistent updating of the channel line-up, whether automated or not – as such, clear viewer communications (ideally on-air) should inform Freeview viewers of any such changes.

5. Do you agree with Digital UK's proposed amendments to the LCN Policy, to remove rules that prohibit LCN trading between channel providers?

Yes. Whilst the BBC has no plans to trade any of its LCNs, we recognise the benefits that this may bring to channel providers, particularly new channel providers keen to enter the market but who recognise the importance of having prominence on the Freeview EPG and currently find no easy routes to getting that prominence, as opposed to trading permissions on other platforms.

6. Do you agree with Digital UK's proposed amendments to the LCN Policy, to increase the minimum broadcast hour requirement for new channels?

The BBC agrees with Digital UK's proposed amendments to the LCN Policy. We have witnessed a situation where certain channels have been effectively reserving LCNs by only broadcasting for a very limited number of hours. Whilst this has not led to bad outcomes per se, it has effectively blocked the opportunity of other LCN Policy rules (e.g the 'associated channels' rule) from being applied that could have resulted in better outcomes for both viewers and channel providers. Placing a minimum broadcast hour requirement on any new channels should therefore see an ongoing minimising in the number of channel providers that use LCNs in the manner described earlier.