

Consultation on changes to Digital UK's LCN Policy

Responses by Canis Television & Media Ltd

January 2021

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

In Part. We strongly support the option to allow HD services to broadcast on LCN's that are not explicitly reserved for just HD services. This works well on other platforms. However, we do not think that HD substitution should be reserved only for Freeview Play channels – it should be open to all broadcasters who can provide a suitable feed.

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

In Part. We feel that any LCN only available in a specific region should additionally be permitted to be used nationally for the operation of an IP service. For example, we operate or manage a range of services on the G-MAN multiplex in the Greater Manchester area – these LCN's can only be received in this geographic area. We feel these channels should be able to be received by IP in other areas that are not covered by the traditional broadcast.

We have lobbied DigitalUK previously on this matter and are disappointed that this is not considered part of this consultation. With Arqiva stepping down as a DigitalUK shareholder, we feel this situation should be looked at again.



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

In Part. The option to launch IP only channels, without a corresponding over-the-air element, on LCN's 300-599 should not just be open to broadcasters who are also part of Freeview Play. However, we do not believe this is practical without further criteria being set to avoid an influx of low-value services, and to the detriment of existing services and multiplex operators.

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?

Yes.

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.

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

No. As a Multiplex Operator operating the G-MAN multiplex in the Greater Manchester area, this change would significantly reduce the number of channels that we are able to carry on our multiplex. Our multiplex is a low-cost entry route to Freeview broadcast and has been an incubator of channels that have gone on to broadcast nationally by being flexible to contract durations, hours of operation, time-sharing etc. This change would have a far greater effect on us than it would on the national multiplexes. We also feel this restriction is not conducive to the growth and value of Freeview as a leading broadcast platform.

