



Consultation on the allocation of an LCN for the Freeview Accessible TV Guide

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1 Executive Summary

1.1 About Freeview, Freeview Play and Digital UK

Freeview is the biggest TV platform in the UK, used in 18 million homes, giving viewers access to the country's most popular TV shows, for free.

Its connected TV service, Freeview Play, brings together the best of the UK's free content, live and on-demand from BBC iPlayer, ITV Hub, All 4, Demand 5, UKTV Play, CBS Catchup Channels UK and Horror Bites. The service is available on the majority of smart TVs sold in the UK and with over 20,000 hours of on-demand content, has quickly become a 'must-have' feature for consumers. Freeview Play currently has 5.1 million active users and continues to grow.

The Freeview platform is managed by Digital UK Ltd and DTV Services Ltd. The companies have four common shareholders - BBC, ITV, Channel 4 and Arqiva - and Sky is a shareholder in DTV Services Ltd.

Digital UK holds Ofcom licences to provide an Electronic Programme Guide ('EPG') – commonly known to consumers as the TV Guide. Digital UK's listing of logical channel numbers ('LCNs') and its LCN Policy ('the LCN Policy') both conform to the requirements of the Communications Act 2003 and Ofcom's Code of Practice on Electronic Programme Guides (the 'Ofcom EPG Code').

The Digital UK LCN listing is used by Freeview, Freeview Play, BT TV, TalkTalk TV, YouView, EE TV and Now TV.

1.2 Freeview Accessible TV Guide

More than two million people in the UK have sight loss¹, and 11 million have hearing loss².

Digital UK is working to build an accessible version of the Freeview TV Guide, that will work on all Freeview Play devices. To access the Freeview Accessible TV Guide, users will switch their TV to a particular channel number. The Freeview Accessible TV Guide will include these features, as required by the Ofcom EPG Code:

- Text will be rendered to speech, to make it easier for people with visual impairments to use
- Programmes with Subtitles / Audio Description / Signing will be filtered, to make them easier to find
- The size of the text will be increased, to make it easier to read
- The display will have a high contrast ratio

¹ <https://www.rnib.org.uk/professionals/knowledge-and-research-hub/key-information-and-statistics>

² <https://www.actiononhearingloss.org.uk/how-we-help/information-and-resources/publications/research-reports/hearing-matters-report/>

Users will be able to customise it to their own specific accessibility needs.

We plan to launch the Freeview Accessible TV Guide in summer 2020.

1.3 Proposal

Digital UK proposes that the Freeview Accessible TV Guide should be allocated LCN 555, as this number is both easy to remember, and easy for blind users to find as the 5 button on remote controls has a raised dot which acts as a tactile indicator.

LCN 555 is currently part of the 'IP delivered services' section at 300-599. This is reserved for the use of IP television platforms (such as YouView) to allocate to channels delivered by IP. We propose to amend the Digital UK genre ranges to the following:

Genre	First LCN	Last LCN
General Entertainment	1	99
Freeview Information	100	100
HD	101	139
General Entertainment	140	199
Children's	200	229
News	230	249
Text	250	259
Streamed services	260	299
IP delivered services	300	554
	556	599
Freeview Accessible TV Guide	555	555
Interactive services	600	609
SD simulcast area	610	669
Adult	670	699
Radio	700	750
Testing area	751	799
Reserved for manufacturer use	800	999

1.4 Timetable and next steps

We encourage responses from all stakeholders in the DTT platform; particularly channel providers, multiplex operators, TV platforms that would be affected by the proposals, consumer groups, charities representing disabled people and older people, and viewers and listeners, particularly those with disabilities affecting their sight, hearing or both. All responses should reach Digital UK by 17:00 on 8 November 2019. Section 4 of this document provides further details on how to respond.

2 Freeview Accessible TV Guide

2.1 Accessibility requirements of the EPG Code

The Ofcom EPG Code states:

“EPG providers should use reasonable endeavours to secure so far as practicable that their EPGs include facilities for users to do all or as many as possible of the following, or to introduce accessibility features that would be equally effective:

- a. render text needed for EPG navigation and the provision of information on channels and programmes included in the EPG as speech;
- b. highlight or list separately programmes with audio description, and with signing;
- c. adjust the display of EPG information so that it can magnified, or the text enlarged; and
- d. select a ‘high contrast’ display.”

Digital UK has sought to secure these features through careful cooperation with TV and set-top box manufacturers. Digital UK defines the product operating rules for Freeview and Freeview Play devices. Product implementation, however, is down to manufacturers and Digital UK does not have direct control of receivers.

By developing the Freeview Accessible TV Guide, we are for the first time seeking to deliver these accessibility features directly to viewers.

2.2 Freeview Accessible TV Guide

Freeview Play brings terrestrial TV, catch-up and on-demand together in a new generation of televisions and set-top boxes, making it easier than ever for viewers to watch what they want, when they want. Freeview Play currently has 5.1 million users, and this number continues to grow.

More than two million people in the UK have sight loss³, and 11 million have hearing loss⁴.

Digital UK is working to build an accessible version of the Freeview TV Guide, that will work on all Freeview Play devices. To access the Freeview Accessible TV Guide, users will switch their TV to a particular channel number. The Freeview Accessible TV Guide will include the following accessibility features:

³ <https://www.nib.org.uk/professionals/knowledge-and-research-hub/key-information-and-statistics>

⁴ <https://www.actiononhearingloss.org.uk/how-we-help/information-and-resources/publications/research-reports/hearing-matters-report/>

- Text-to-speech set as default
- The ability for users to filter live TV and on-demand content according to whether it has subtitles, audio description or signing
- Always-on magnification (so text will be twice as large as usual)
- A simple, list-based, high contrast user interface

Users will be able to customise it to their own specific accessibility needs.

We plan to launch the Freeview Accessible TV Guide in summer 2020.

3 Proposal for LCN allocation

3.1 Introduction

To try to decide which LCN would be optimal for the Freeview Accessible TV Guide, we sought opinions from potential users, with the help of the Digital Accessibility Centre (DAC), a non-profit social enterprise and one of the leading providers of web accessibility services.

We presented potential users with two options, both of which we considered would be easy for users to find:

- LCN 555 – because the 5 button on a remote control features a raised dot, and
- LCN 258 – because this is a straight line down the centre of a remote control.

In order to allocate LCN 555 or LCN 258 to the Freeview Accessible TV Guide, we would need to amend the LCN Policy. LCN 555 is currently part of the 'IP delivered services' section at 300-599. LCN 258 is currently part of the 'Text' section at 250-259.

3.2 Option A – Digital UK's proposal: LCN 555

LCN 555 was the preference amongst potential users canvassed by the DAC – both because it is easy to remember, and because the 5 button on remote controls has a raised dot which acts as a tactile indicator for blind users. For the same reasons, **Digital UK proposes that this would be the best LCN to use.**

LCN 555 is currently part of the 'IP delivered services' section at 300-599. This is reserved for the use of IP television platforms to allocate to channels delivered solely by IP (i.e. without a DTT element).

YouView provides IP-enabled set-top boxes for BT TV and TalkTalk TV subscribers. Currently, TalkTalk's YouView line-up includes Zee TV at LCN 555. BT does not currently have a service at LCN 555.

We have tested how YouView devices would react if we broadcast an HbbTV application at the same LCN as an existing YouView IP-delivered service and have unfortunately uncovered some issues. Both services appear in the listing (i.e. TalkTalk's viewers would see two 555s in the list), and it is not possible to scroll up from one of the services to the other. However, viewers will be able to scroll down, or use the number keys to turn to a different channel.

To fix this issue, either YouView would have to roll out software changes across their devices, or TalkTalk would have to move the incumbent service Zee TV to a different LCN.

Figure 1: Digital UK genre ranges under Option A

Genre	First LCN	Last LCN
General Entertainment	1	99
Freeview Information	100	100
HD	101	139
General Entertainment	140	199
Children's	200	229
News	230	249
Text	250	259
Streamed services	260	299
IP delivered services	300	554
	556	599
Freeview Accessible TV Guide	555	555
Interactive services	600	609
SD simulcast area	610	669
Adult	670	699
Radio	700	750
Testing area	751	799
Reserved for manufacturer use	800	999

3.3 Option B – alternative proposal: LCN 258

Potential users canvassed by the DAC generally felt that LCN 258 would be a reasonable alternative to LCN 555. 258 represents a straight line down on a remote control.

LCN 258 is currently part of the 'Text' section at 250-259. This is for "the presentation of on-screen text services which are predominantly used by viewers to seek out specific information". Whilst this definition could apply to the Freeview Accessible TV Guide, the LCN Policy states that if a channel might meet the definition of more than one genre, we should consider the technical nature of a channel (including whether it is streamed) before considering the nature of the content.

Under this option, one less LCN would be available for allocation to future Text services. However, we consider this is unlikely to cause any issues given that no new Text services have launched since 2013, and four have closed since then.

Figure 2: Digital UK genre ranges under Option B

Genre	First LCN	Last LCN
General Entertainment	1	99
Freeview Information	100	100
HD	101	139
General Entertainment	140	199
Children's	200	229
News	230	249
Text	250	257
	259	259
Freeview Accessible TV Guide	258	258
Streamed services	260	299
IP delivered services	300	599
Interactive services	600	609
SD simulcast area	610	669
Adult	670	699
Radio	700	750
Testing area	751	799
Reserved for manufacturer use	800	999

3.4 Consultation question

- Do you agree with Digital UK that LCN 555 (Option A) should be allocated to the Freeview Accessible TV Guide?
- If not, do you believe that LCN 258 (Option B) should instead be allocated to the Freeview Accessible TV Guide?
- If not, which LCN do you believe should be allocated to the Freeview Accessible TV Guide?

4 Responding to this consultation

We encourage responses from all stakeholders in the DTT platform; particularly channel providers, multiplex operators, TV platforms that would be affected by the proposals, consumer groups, charities representing disabled people and older people, and viewers and listeners, particularly those with disabilities affecting their sight, hearing or both.

We will publish all non-confidential responses on our website. Please indicate on your response whether none, some, or all of your response is confidential. In the absence of an indication to the contrary, responses will be treated as non-confidential.

To be considered, a response must reach Digital UK by **17:00 on 8 November 2019**, unless Digital UK accepts that mitigating circumstances apply.

Responses can be emailed to consultation@digitaluk.co.uk or mailed in hard copy to the following address: FAO: Sarah Fox, Digital UK, 2nd Floor, 27 Mortimer Street London W1T 3JF.