

Response to Digital UK (“DUK”) Consultation on changes to DUK’s LCN Policy dated 18 November 2020 (the “Consultation”) on behalf of ITV, ITV HD, ITV+1, ITV2, ITV2+1, ITVBe, ITVBe+1, ITV3, ITV3+1, ITV4, ITV4+1 and CITV (“ITV Channels”)

Introduction

ITV Broadcasting Limited (“ITV” or “we”), on behalf of each of the ITV Channels on the Digital Terrestrial Television (“DTT”) platform, recognises DUK’s objective of developing its LCN Policy for the long-term benefit of the DTT/IP hybrid platform, in the interests of viewers and in accordance with the PSB prominence and fair, reasonable and non-discriminatory requirements of the Ofcom EPG Code.

With the above objective in mind, ITV supports the proposals set out in the Consultation and welcomes the opportunity to respond to the questions set out in the Consultation.

Response to Consultation Questions

Question 1: Do you agree with DUK’s proposed amendments to the LCN Policy, to enable HD/SD substitution for devices which support CLM?

ITV agrees with DUK’s proposal, as long as HD/SD substitution would be at the election of the channel provider (important in particular for providers of PSB channels with additional licence obligations in relation to their SD services only) and could be carried out on a region-by-region basis (important for ITV as not all regional variants of ITV’s main channel are available in HD on DTT), as DUK proposes.

Question 2: Do you agree with DUK’s proposed amendments to the LCN Policy, to enable IP fallback channels for devices which support CLM?

ITV agrees with DUK’s proposal. This will allow a Freeview line-up of channels to be available to viewers who do not have an aerial or live in an area where some channels are not available via their relay transmitter.

Question 3: Do you agree with DUK’s proposed amendments to the LCN Policy, to enable IP-delivered channels for devices which support CLM?

ITV agrees with DUK’s proposal. This will broaden the range of channels available on the Freeview Play platform.

Question 4: Do you agree with DUK'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?

ITV agrees with DUK's proposal. We believe that channel providers should have greater flexibility and will continue to manage their channels in the interests of viewers.

Question 5: Do you agree with DUK's proposed amendments to the LCN Policy, to remove rules that prohibit LCN trading between channel providers?

ITV agrees with DUK's proposal. We believe that there will not be any obvious detriment to viewers or the platform. ITV agrees with DUK's proposal to charge a reasonable fee to both channel providers involved in a trade, recognising both the likely increase in DUK's administrative burden as well as the transfer of value between channel providers.

Question 6: Do you agree with DUK's proposed amendments to the LCN Policy, to increase the minimum broadcast hour requirements for new channels?

ITV agrees with DUK's proposal, which would affect any new channel launching on the platform from the date of the new LCN Policy taking force.