



RTÉ's submission to Digital UK's consultation on changes to the LCN Policy

RTÉ welcomes the opportunity to respond to Digital UK's consultation on changes to the LCN Policy. RTÉ provides two TV channels and one radio station on the Freeview platform, broadcast on NIMux in Northern Ireland.

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

RTÉ agrees with these proposed amendments, on the understanding that CLM is delivered via IP-only to compatible devices and that metadata changes in the DTT broadcast stream are not required, to avoid impacts on reception of the Republic of Ireland's DTT platform (Saorview) along border areas.

Further, channels on NIMux are delivered in SD-only so HD substitution would not apply given the current technical configuration of NIMux.

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

RTÉ agrees with these proposed amendments. RTÉ's channels on Freeview are delivered via DTT-only. As RTÉ is not a Freeview Play partner we are aware that IP fallback is not an available option for us. If, in the future, RTÉ decides to utilise IP for channel delivery in Northern Ireland, we understand that would require a discussion with Digital UK.

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

We agree based on the understanding outlined in question 1.

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?

RTÉ agrees with this proposal on the understanding that a reordering of LCNs by a channel provider is optional, and that RTÉ's channels are not impacted by the reordering activities of another channel provider.

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

We agree with this proposal, on the understanding that such change is voluntary and optional, and that RTÉ channels will not be impacted due to trading activities between other channel providers.

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

RTÉ supports these proposed amendments.

In response to questions 4 and 5, we note that these proposals may affect an increase in customer support calls from Northern Ireland border viewers in the event of channel reordering. Therefore, RTÉ would appreciate advance notice from Digital UK so that the Saorview call centre can be briefed.