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Digital UK's consultation on changes to Digital UK's LCN Policy

UKTV Response – 15 January 2021

UKTV welcomes the opportunity to respond to Digital UK's consultation on changes to Digital UK's LCN policy.

UKTV agrees in principle with these proposed changes to the LCN policy and acknowledges that increasing the availability of high-quality content is in the best interests of viewers long-term. In particular, UKTV welcomes the proposed removal of LCN slot trading restrictions which affords channel providers more flexibility to manage and optimise their channel portfolios to the benefit of viewers.

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

UKTV agrees with the proposed amendments.

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

UKTV agrees with the proposed amendments.

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

At paragraph 3.3 of the consultation document, it is proposed that the IP-delivered channels will be "allocated in the order that the apps appear on Freeview Play devices". Ofcom's 'Code of practice on electronic programme guides' (**EPG Code**) requires that LCNs be allocated on the basis of a published and objectively justifiable methodology. As far as we are aware, Digital UK has not published the methodology used to determine the ordering of the Freeview Play apps. We therefore invite Digital UK to publish the methodology used to order the Freeview Play apps so that broadcasters can make informed submissions as to whether that methodology should be applied to linear IP-delivered channels.

In the absence of the published methodology, we understand anecdotally that the order of the Freeview Play apps is determined by each broadcaster's highest LCN position in the Freeview EPG. We note that the removal of LCN slot trading restrictions proposed in this consultation may result in more frequent changes to broadcasters' LCN positions. We agree with the proposed removal of those restrictions but note that, if our understanding is correct, any slot changes could alter the order of the Freeview Play apps and subsequently the IP-delivered channels, meaning that multiple blocks of up to 10 IP-delivered channels could move at any one time and on a frequent basis. We are



concerned that this could cause disruption for viewers by making it harder for viewers to return to existing content which they know and love. We further invite Digital UK to consider whether an alternative methodology that would cause less disruption for viewers should be applied to determine the ordering of linear IP-delivered channels.

At paragraph 1.3.3 of the consultation document, it is proposed that paragraph 2.2 of the LCN Policy will be amended to state that to be eligible for an LCN, an IP-only channel will be required to have: (i) a Freeview Play Content Provider Agreement; (ii) a valid broadcasting licence permitting the channel to broadcast on the Freeview Play platform in the UK; and (iii) arrangements for providing EPG schedule data. The consultation document does not propose amending the LCN Policy to state that to be eligible for an LCN, the IP-only channel must be streamed through the relevant Freeview Play app, although we understand that in practice this will be a technical requirement. We invite Digital UK to confirm if this will be a technical requirement, and if so, explore alternative technical means that would allow broadcasters of eligible IP-only channels to deliver content by IP without such delivery being facilitated by the relevant Freeview Play app.

Question 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?

UKTV agrees with the proposed amendments.

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

UKTV agrees with the proposed amendments.

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

UKTV agrees with the proposed amendments.