

VIACOM

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

ViacomCBS supports this proposal, subject to the viewer (in addition to the channel provider), being able to choose whether an HD/SD substitution is activated on their device. The viewer should be able to keep an SD variant in the lower (i.e., more prominent) LCN slot, should this be their preference. For example, if:

- i. The viewer's receiving equipment (television screen and/or STB) either does not fully support, or ceases to support due to malfunction, the presentation of HD DTT services;
- ii. The multiplex(es) signal carrying HD services is not available or is weaker in the viewer's area, or as a result of inadequate aerial specification or installation.

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

ViacomCBS supports this proposal.

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

ViacomCBS supports the introduction of designated LCN slots, along the lines proposed by Digital UK, for IP-delivered channels, subject to the following:

- i. That, for the avoidance of doubt, the requirement to hold "a valid broadcasting licence (or equivalent authorisation)" does not go beyond the minimum requirements of regulation or legislation relevant to IP channel distribution via the Freeview Play platform
- ii. That, in line with Digital UK's separate proposals for LCN trading (section 3.5) more widely, IP channels delivered via an LCN allocated under this proposal are not limited solely to those owned and operated by the channel provider

4) Swapping and changing LCNs: 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?

ViacomCBS supports this proposal.

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

ViacomCBS supports this proposal.