

Response from Videoondemand365 Limited (VOD365) to the Consultation on changes to Digital UK's LCN policy dated 18th November 2020

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

Yes

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

Yes

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

Our view is that a channel should be in a position to make an application for an LCN irrespective of whether it is a DTT or IP Linear Channel and for the purposes of viewer ease of use, these should be allocated within the genre range. The criteria that DUK should apply when allocating an LCN is whether the channel adds sufficient value and differentiation to meet viewer needs.

- 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 name of their channels?**

Yes

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

Yes

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

We do not agree with the proposed amendment as it appears that IP streamed channels are treated separately as set out in 1.3.3. Our view is that the broadcast hour requirement of 6 hours should refer collectively to DTT and IP Linear. We have been trying for some time to secure broadcast bandwidth to deliver DTT without success. We believe that flexibility around how many hours potentially could be acquired as to date anything other than one day part slot of 10hours: 1pm-10pm, SD TV channel and one 24 hour SD TV Channel.