

**Consultation on
Logical Channel Number Policy for a
Next Generation Platform (Freely)**

STATEMENT

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1. Executive Summary and Introduction

1.1. About Everyone TV

- Everyone TV is the joint venture leading the operations and strategy of the UK's two main free-to-air TV platforms, Freeview and Freesat. Owned and supported by the UK's leading public service broadcasters – the BBC, ITV, Channel 4 and Channel 5 – we are the champions of free TV.
- We are the organisation (formerly known as Digital UK) responsible for running Freeview, the UK's largest TV platform. Freeview originated as a broadcast TV service delivered by aerial (digital terrestrial television, or 'DTT') and has evolved to also offer a hybrid broadcast/on-demand TV service, Freeview Play, now built into most connected TVs sold in the UK. Freeview & Freeview Play are used in 16 million homes or 60% of TV households and provide the main TV platform in more than 10 million homes.
- We are also the organisation responsible for providing free-to-air broadcast TV services by satellite (digital satellite television, or 'DSat'), under the Freesat brand since our merger in 2021. Freesat is the main TV service in around 1 million homes via set-top boxes and select TVs (e.g., Samsung, LG, and Sony).
- In 2023, we developed a framework for a new future-facing next-generation platform that viewers will be able to use over the coming decade and beyond, and which will operate regardless of the technologies by which TV channels are distributed. The new TV service was formally announced in September, under the brand name Freely, and is set to launch on connected TVs in 2024.

1.2. The consultation

- In June, we consulted on a 'Logical Channel Number (LCN) Policy' for what we then described as a Next Generation Platform (NGP).
- Given the likely greater use of IP as a distribution technology for free TV services, our aim was to establish a framework for an NGP that would be agnostic between distribution technologies.
- **The consultation relates solely to the NGP and our proposed LCN Policy for this platform. It does not relate to the DTT LCN Policy (which covers platforms including Freeview and Freeview Play) or Freesat: for the avoidance of doubt, channel numbers on Freeview, Freeview Play and Freesat are not affected by this consultation.**

- Our starting point was that there will remain an important role for linear scheduled TV channels in an IP-delivered TV world, and we therefore need to think about how an Electronic Programme Guide (EPG) might look and the rules for allocating channel numbers on an NGP. The consultation invited views on our proposed LCN Policy for such a platform.
- Given the need to integrate IP-delivered channels in the EPG as part of a future-facing platform, our view was that we needed to develop a new LCN Policy for an NGP (separate from that for Freeview, Freeview Play and Freesat).
- Our objectives in designing a proposed NGP LCN Policy were to:
 - Make it easy for viewers to discover content through simple navigation;
 - Ensure the ongoing prominence of public service channels;
 - Protect consumers from potential harm (e.g. ensure Children’s content is distant from any Adult content); and
 - Allocate and manage LCNs fairly and efficiently.

We also seek to give channel providers the opportunity to reach viewers, and make it easier for viewers to transition to IP-delivery for free TV in the years ahead.

1.3. Launch of Freely

- Subsequent to the conclusion of the consultation period (at the end of August 2023), the NGP was formally [announced](#) by Everyone TV in September 2023, under the brand name Freely (in this Statement, “Freely” will henceforth be used in place of references to “the NGP” in the consultation document).
- Freely is positioned as a new free TV service that will deliver live TV over broadband. For the first time for free, British viewers will be able to easily browse and watch live TV channels together with on demand content streamed straight to their smart TV via the internet.
- The new service will provide easy access to a single consistent experience for live free TV over IP. Viewers will be able to seamlessly browse channels through a modern and intuitive programme guide – the subject of the LCN Policy on which we were consulting.
- Freely will also offer innovative functionality designed to make it easier to find and explore new shows directly from live TV. As we will describe in Chapter 2, some respondents made reference to such kinds of functionality. While these comments may be relevant to the overall platform, they are not relevant to the LCN Policy specifically and are therefore out of scope with regards this consultation.

- Freely is set for launch in 2024 and will be built-in to the next generation of smart TVs and set-top boxes. It will roll out initially offering DTT and IP compatibility, with the intention that satellite (DSat) compatibility will follow at a later stage.

1.4. Decisions

- Having considered the consultation responses, we list here our final decisions. Where appropriate, we have amended our original proposals in line with comments from respondents.
- The LCN Policy presented in the Annex reflects our final positions on the issues on which we consulted. It also covers administrative matters and the full details of rules that are summarised in this Statement.

Key organising principles for a next generation EPG

- Freely will have its own LCN Policy, separate from those used on other free TV platforms.
- We will adopt in full our proposed main TV Genre Categories for the Freely EPG at launch: Entertainment, News, Children's, Music, Shopping and Faith & International.
- We will adopt in full our proposals regarding the allocation of LCNs to public service channels.
- We will adopt in full our proposals for ordering channels by reach and allowing channel pairings:
 - We will use average weekly five-minute reach on DTT, calculated using a full year of data, as the measure of popularity used to rank each channel for the initial EPG.
 - For the launch EPG, we will use data for calendar 2022 as the basis of our reach-based ranking of channels.
 - We will allow each channel to bring with it a second channel from its family (the one with the next highest reach) – to create a pairing. The two channels may then swap position should the channel provider wish.

Details of LCN Policy

- We will adopt our proposals regarding the Genre Categories and LCN allocations, as set out in the consultation, subject to amendments to the proposed allocations of LCNs across the Hybrid Streamed, Radio and Adult categories:

- We will move ten of the LCN slots we had allocated to Adult, and ten of the LCN slots we had allocated to Radio, over to Hybrid Streamed. As a result, Hybrid Streamed (including Text) will have 49 LCNs (20 more than in the consultation document).
- We will place Radio ahead of Adult in the order of Genre Categories.
- We will place News ahead of Children’s in the order of Genre Categories.
- We will adopt our proposals regarding the step-by-step rules for initially establishing the EPG listing, as set out in the consultation. Regarding the rules on which we invited comments:
 - We will adopt our proposed approach to give non-BARB-rated channels slots in the next available LCNs in their relevant Genre Categories behind the channels with reach data, in the same order as these channels occur in the relevant section of the DTT EPG.
 - We will treat the Faith & International Genre Category in the same way as Shopping, Hybrid Streamed, Text and Adult: channels will be allocated LCNs in the same order as they occur in the DTT EPG.
 - We will adopt our proposed rules for channels that have launched recently and for which a full year of reach data is not available.
- For IP-only channels that channel providers (CPs) wish to include on the launch EPG, CPs will be required to provide a list of the names and proposed Genre Categories of the channels they wish to put in our launch queue ahead of a designated ‘decision day’. We will then offer LCNs to CPs in pairs, with the CPs ordered on the basis of the position of their first already-allocated channel on the LCN list that appears in the majority of the UK (a single channel will be allocated if the CP does not have a pair; channel providers that do not have any LCN that is used in the majority of the UK will be ordered behind those that do, in the order of their first LCN that is used in the minority of the UK). Once all channel providers have had their first pair of channels allocated, the process will begin again from the first CP and repeat until all IP-only channels have been allocated. This allocation process will apply separately in each Genre Category. Channel providers may hold these LCNs for a period of time before launching their channel, but they may not trade the LCN until they have broadcast content appropriate to the Genre Category on the LCN for at least 12 months.
- The full launch EPG for Freely is shown below, with amendments to the consultation document highlighted.

Genre categories	First LCN	Last LCN
Entertainment	1	30
Reserved for promotional purposes (single LCN)	31	31
Entertainment (continued)	32	89
Reserved for promotional purposes	90	99
Freely information (single LCN)	100	100
Entertainment (continued)	101	249
Time-shift (+1 channels)	250	299
News	300	349
Children's	350	399
Music	400	449
Shopping	450	499
Faith & International	500	549
Hybrid Streamed & Text	550	554
Accessible EPG (single LCN)	555	555
Hybrid Streamed & Text (continued)	556	599
Radio	600	739
Adult	740	749
Regional variants	750	799
Manufacturer Technical Use	800	999
Reserved to mark end of Everyone TV range and start of manufacturers' range	1000	1000
IP channels delivered by manufacturers	1001	9999

Rules for the ongoing management of the EPG post-launch

- We will adopt in full the proposed rules in the consultation document for post-launch events covering:
 - new public service channels,
 - new non-public service channel launches,
 - channel exits that leave LCN slots vacant, and
 - changes by channel providers to their line-ups and channel swapping.

- We will adopt in full our proposals regarding the addition of DSat-only channels to the EPG, as set out in the consultation.
- We will adopt our proposals regarding minimum broadcast hours, as set out in the consultation, with one change:
 - The threshold will be set at six hours, as is the case in the DTT LCN Policy.
- We will adopt in full our proposals regarding LCN sharing for sub-UK channels, as set out in the consultation.
- There will be a moratorium on trading when the platform launches. Trading will then be permitted 12 months after the launch date of the new platform, without the need for further consultation.
- We will adopt in full our proposals regarding periodic LCN reorderings and LCN Policy Reviews.
 - Every three to five years, we will reorder the LCN listings (having first given all channel providers one year's notice of our intention to do so). This reordering will follow the same principles as the initial Freely LCN allocation process: it will assign LCNs to public service channels as appropriate, and allocate LCNs to other channels based on their popularity, and use 'pairing' rules. We will also consider whether there may be other methods to better meet audience expectations about putting the most popular channels into prominent positions.
 - At the same time as the reordering, we may also review the LCN Policy more broadly against the objectives for the Freely LCN Policy (as set out in Section 2.1) and consider whether to consult on making changes to it.
 - If at any point in time we find that demand for LCNs is outstripping supply in any Genre Category, then we would undertake a review of the LCN allocations with a view to expanding the allocation to the relevant Genre Category. Any such review would aim to make as few changes as needed to the LCN listing.
 - We reserve the right to undertake a review of the LCN Policy at any time, if we believe there are compelling platform or viewer reasons to do so.

2. Objectives of LCN Policy for a next generation platform

2.1. Components of the new platform and objectives

- We introduced Freely in the consultation document as follows, referring to it then as a next generation platform (NGP):
 - Freely has been designed to ensure both backwards and forwards compatibility. Freely devices will operate like a standard DTT device if only connected to DTT, or like a Freesat device if just connected to DSat (with their respective DTT and Freesat EPGs). But once connected to the internet, Freely devices will deliver IP channels alongside DTT and DSat channels, all of which would be accessed via the new unitary EPG.
 - We have developed a new protocol for IP channels delivered via a Freely-approved method. These channels, henceforth referred to as ‘IP-delivered channels’, conform to technical specifications set out by Everyone TV and are delivered to viewers via Everyone TV’s approved streaming methods¹. This will enable a consistent, seamless viewing experience when viewers move between broadcast and IP-delivered channels.
 - IP-delivered channels differ from Hybrid Streamed channels, for which audio-visual content is delivered over IP but access is enabled via an MHEG or HbbTV application that is broadcast over DTT, and are not therefore accessible to IP-only households in the same way as IP-delivered channels. IP-delivered channels also differ from ‘pure’ IP channels delivered by manufacturers.
 - An explicit aim of Freely is to be technology-neutral, by which we mean not discriminating between broadcast (DTT or satellite) and IP-delivered channels. Under this approach, broadcast and IP-delivered channels within any given genre would sit alongside each other in the relevant section of the EPG; any individual channel delivered via both broadcast and the Freely-approved IP delivery method would have one single shared LCN; and channels that are solely IP-delivered would be allocated an LCN in the same way as if it were a broadcast channel (or delivered via both broadcast and IP).

¹ Everyone TV may make adjustments to the technical specifications and/or approval criteria from time to time

- We set out the following objectives for the new LCN Policy:
 - Make it easy for viewers to discover content through simple navigation;
 - Ensure the ongoing prominence of public service channels;
 - Protect consumers from potential harm (e.g. ensure Children’s content is distant from any Adult content); and
 - Allocate and manage LCNs fairly and efficiently.

We also seek to give channel providers the opportunity to reach viewers, and make it easier for viewers to transition to IP-delivery for free TV in the years ahead.

- Amongst the findings of an insight study on viewers’ priorities for a new LCN Policy that Everyone TV commissioned were:
 - Viewers would welcome **genre-based channel groupings** when it makes sense to separate them out.
 - Audiences recognise that there are some benefits of **channels within the same family being grouped together**, on the grounds of ‘logic’ and ‘neatness’, whilst not wanting this to crowd out other channels.

Our LCN Policy has been guided by these findings. When the findings were not aligned with each other, trade-offs between them needed to be made.

2.1.1. Consultation responses

- We did not seek responses to the introduction to the new platform summarised above. However, some respondents chose to make overarching comments, which we briefly summarise here.
- A number of the industry and viewer respondents supported the proposals overall (subject to their responses to individual questions). For example:
 - News UK welcomed the consultation in the context of the continued importance of live, scheduled TV, stating: “*We agree that live, scheduled TV will retain an important role, and we acknowledge the difficulty Everyone TV has in finding a balance between the varying interests of stakeholders*”.
 - Roku stated: “*We are also mindful of the stakeholder complexity in making any new proposal and fully support the principle of appropriate PSB [public service] prominence. While we would suggest that the current proposal is kept under regular review, we believe that the framework is well-designed and balances the needs of different stakeholders as well as offering users a better experience of PSB services.*”

- A confidential response from a manufacturer expressed concerns about the proposed concept of Freely-approved IP-delivered channels, saying that it “*has consistently argued against the definition of proprietary non-standards based approaches*”.
- We also received comments that were out of scope of the terms of this consultation. They broadly fell into two categories.
 - In the first case, industry and viewer respondents set out alternative visions of a next generation platform, citing greater use of apps and integration of linear TV channels and apps, customisable and personalised interfaces, greater use of filters and metadata and other means of search and discovery, personalised recommendations, and the recommendation that there be an app for the new platform on mobile devices and other TV platforms like Apple TV.
 - The second category came mostly from viewers, who commented on any potential IP transition. They expressed concern about losing their existing DTT and DSat services, which they were generally happy with. There was also concern that some groups of people – older people, those living in rural areas and the less wealthy – may not have access to or be able to afford fast internet services or the cost of new equipment and would be left behind. Concern was also expressed that IP networks would not be able to cope with the additional traffic, citing current buffering issues.
- Beyond these two broad categories, two respondents suggested that the current DTT LCN Policy should be amended to align it with the new Freely LCN Policy. Also, some channel providers requested clarity on the long-term plans for the Freeview and Freesat platforms, and the relationships between those platforms and Freely. They also raised questions about the charging strategy and other commercial/technical questions on platform access.

2.1.2. Consideration of responses

- We reiterate that the document deals exclusively with the LCN listing for the new platform and everything else – including the broader functionality that will be available on the platform – is out of scope.
- Regarding the manufacturer’s comment on “*proprietary non-standards based approaches*”, one of the most important innovations on the new platform is our development of a protocol for IP channels delivered via a Freely-approved method. This enables a consistent, seamless viewing experience when viewers move between broadcast and IP-delivered channels, as the latter will look and feel the same as broadcast channels while being delivered entirely by IP.

- Respondents made some helpful comments and suggestions on the overall platform beyond the EPG itself, and these are gratefully received. Further details of the overall Freely product will be forthcoming.
- The transition to IP delivery of TV raises very important policy issues, and we appreciate the comments made by some viewers.
 - Such issues are out of scope of this consultation. We noted in the consultation document that debates have begun about how TV will be delivered in the future, and there is little clarity at this stage about how quickly such developments may occur.
 - For viewers who do have access to IP, Freely will offer a new richer experience alongside the existing platforms, which will continue in their current form. The new platform is our contribution to the early thinking and planning for any potential IP transition.
 - For viewers who do not have access to the internet, a Freely device connected to an aerial will behave as a DTT device, using the DTT LCN Policy.
- The suggestion that the DTT LCN Policy should be amended to align with the Freely LCN Policy is out of scope. In any case, we set out in the consultation document (and discuss further in the next Chapter) the reasons why a new LCN Policy is needed for the new platform that is distinct from that for DTT or Freesat.
- The questions about the charging strategy for content providers and other commercial/technical questions on platform access are also out of scope. Everyone TV will engage directly with the interested channel providers.

3. Key organising principles for a next generation EPG

3.1. Need for a new LCN Policy

- The consultation document argued that there are two key reasons why Freely needs its own new LCN Policy:
 - The Freeview and Freesat EPG listings and their LCN policies are substantially different from each other.
 - IP-delivered channels need to be integrated, and there will be more of them over time.
- We stated that our preferred approach is to create an LCN Policy that is new and will satisfy viewers' needs and expectations, but which draws on the characteristics of the existing Freeview and Freesat EPGs that are appreciated by viewers.
- A prerequisite for any channel seeking an LCN from Everyone TV on Freely is that the channel or channel provider would need to be appropriately licensed² and conform to all relevant requirements for accessing the platform, including but not limited to those in the LCN Policy, commercial and content terms, and technical specifications.
- These proposals do not affect the LCN Policies and channel numbering for Freeview, Freeview Play and Freesat, which remain separate.

3.1.1. Consultation responses

- 14 industry respondents agreed that the new platform requires a new LCN Policy: the BBC, ITV, Channel 4, Paramount, News UK, UKTV, RTE, TG4, YouView, One Box, The Dales Company and three confidential industry respondents. One viewer also agreed that the new platform needs a new LCN Policy. Examples of the comments received include:
 - The BBC said the launch of Freely: *“offers an opportunity to provide consumers with a linear channel listing and discovery experience, irrespective of the means of delivery, which can be better attuned to their needs and expectations in an environment where the linear channel*

² Notes: The regulatory regime around EPGs and around IP-delivered services is subject to change, and this document is not prescriptive about what we may determine 'appropriately licensed' to mean at the point that Freely launches, or how it may change thereafter. We will engage separately with channel providers on this point. We also note that some channel providers, such as the BBC and S4C, are explicitly excluded in legislation from requiring a broadcast licence: we do consider such services to be 'appropriately licensed'.

proposition is likely to dwarf that of the current capacity-constrained broadcast elements of Everyone TV's platforms."

- TG4 said: *"An NGP [i.e. Freely] comprising a hybrid of DTT and IP services will inevitably lead to an increased range of services to be carried. It is possible that the finite nature of DTT capacity and overall carriage costs have been barriers-to-entry to new FTA television services. A hybrid DTT/IP delivery will likely carry a greater range of services than Freeview or Freesat. This inevitably means that the current Freeview and Freesat LCN systems are unlikely to be able to cope with the increased number and range of services. It is, therefore, sensible to address this by way of implementing a new LCN policy."*
- RTÉ stated that it: *"would agree that a new LCN policy is necessary for a NGP [i.e. Freely], simply because of the inclusion of IP channels and services, and being made available on the platform alongside the DTT channels."* (Its support was caveated by concern over the treatment of Irish channels; their reservation is covered in Section 3.3 below.)
- A confidential industry response from a manufacturer partly supported the proposal, stating that *"a new LCN Policy for an ever increasing IP dominated platform may be a reasonable proposition"*, but argued that *"constraining the number range to ~800 services is short sighted and will not cater for the very large number of channels that will emerge in an IP world."*
- Two respondents disagreed on the need for a new LCN Policy for Freely:
 - Arqiva said it is *"not clear on the need for this and believe that viewers value stability in terms of their expectations and ability to rely on, and navigate, around a channel line-up"*. However, it went on to *"welcome the fact that this consultation only applies to policy rules for a next generation platform and that the current DTT LCN policy as outlined in the introduction to the consultation will not be impacted by these changes"*.
 - A confidential industry respondent argued that the new platform should use the DTT Policy, arguing that a new LCN Policy would be detrimental to viewer experience. It said the result would be differing LCNs for channels on Freeview and Freely and that this might even be the case on different TV sets in an individual household, which risks causing confusion.
- Some respondents discussed the integration of IP channels alongside DTT channels in the new EPG.
 - UKTV argued that there is a risk of Free Ad-Supported Streaming (FAST) channels overwhelming the EPG, and that better funded channels with

more original content may get lost in a crowded Entertainment genre. As a result, viewers would be hindered in discovering compelling content on new DTT/DSat channels, as these would be ranked after potentially hundreds of IP-channels. UKTV went on to recommend that the LCN Policy prioritises DTT and DSat channels above all IP-only channels (apart from PSB or time-shift or HD variants), and to leave vacant slots at the end of the DTT/DSat section for new DTT/DSat channels.

- A confidential industry response also highlighted that “*the risk of multiple-IP services being created to block out large sections of the EPG and pushing others aside is real and detrimental to consumers’ wishes.*”

3.1.2. Consideration of responses

- A large majority of industry respondents to the consultation (14 of the 20) supported our proposals in full for a new LCN Policy that is separate from the existing DTT LCN Policy. Having considered the responses which do not support our proposals, we have not found compelling arguments that change our view that using the existing DTT Policy would not work for Freely (for reasons explained in the consultation document). We also note that the four dissenting responses do not have a common view, with two responses disagreeing that we need a new LCN Policy and two arguing that Freeview should align with the new Freely LCN Policy.
- Regarding the confidential response from a manufacturer, arguing that 800 channels may not be enough, our view is that based on current assumptions we think it is sufficient for Freely channels. We will revise the allocations in the future if we need to, following a review of the LCN Policy (see Section 5.6). Manufacturers will be able to allocate LCNs to IP-delivered channels from LCN 1001 onwards, where there is unlikely to be any constraint.
- Regarding the concerns expressed about the launch of large numbers of IP-only channels that may be of lower quality:
 - An important principle of the platform is to be technology neutral between DTT/DSat and IP-delivered channels.
 - It follows that Everyone TV should not make value judgements based on technology (and therefore should not reserve slots for DTT/DSat channels over and above IP-only channels).
 - In relation to service quality, as part of the Freely approval process for IP-delivered channels, there will be a common set of technical and regulatory standards that we will apply. We will also have requirements for minimum broadcast hours; and during our Periodic Reorderings, the most popular channels will move into more prominent LCNs (see section

5.6). Beyond this, it is not appropriate for Everyone TV to make subjective judgments about the quality of channels.

3.1.3. Decision

- We will adopt in full our proposal to establish a new LCN Policy for Freely, as set out in the consultation. The remainder of this consultation covers the details of the Freely LCN Policy.

3.2. Main TV Genre Categories

- The consultation document argued that the new platform should offer Genre Categories for TV channels where appropriate to aid content discovery and navigation.
- We emphasised the need to strike the right balance when determining which categories to introduce.
 - On the one hand, a lot more channels will potentially be available, as the constraints in broadcast distribution due to capacity (on DTT and DSat) fall away with IP-delivery. This means that more categorisation of content will be needed in the future.
 - On the other hand, it would be counterproductive to separate out certain genres if that ended up hindering rather than helping the discovery of content that falls within those genres.
- Our view was that the optimal number of main TV Genre Categories on Freely should be more than is currently available on the Freeview EPG but less than on Freesat. After some detailed discussion of particular genres – such as Movies and Sports – we concluded that the main TV Genre Categories on the Freely EPG should be as follows (there should also be categories for Adult, Radio, etc., which are dealt with in the next chapter):
 - Entertainment
 - News
 - Children’s
 - Music
 - Shopping
 - Faith & International

3.2.1. Consultation responses

- Seven industry respondents agreed with the proposed main TV Genre Categories for the EPG: the BBC, ITV, Channel 4, Paramount, S4C, UKTV and one confidential industry respondent (though the BBC noted that further granularity in Entertainment may be required in the future).
- In addition to those who explicitly agreed with the specific proposals, Roku stated that they “support the inclusion of genre categories”.
- The biggest area of discussion was around the proposed inclusion of Movies and Sports as part of Entertainment.
 - On the one hand, S4C and Channel 4 both strongly supported this position.
 - S4C said: *“We have an extensive sports offering on S4C, most of which is live and exclusive on free-to-air. [...] Sports content helps us to extend our appeal to viewers who might not have traditionally watched S4C in large numbers. [...] S4C would not however qualify for designation within a Sport category, as it is a General Entertainment channel. There is a risk that audiences interested in sports would go straight to a Sports category and fail to discover S4C’s sizeable sports offering, as well as other relevant content promoted around our sports output. In relation to a Movies category, S4C has launched a Film Fund with the Welsh Government and Ffilm Cymru with a view to investing in the creation of Welsh language films. Again, there is a risk that audiences interested in film would not discover these films if they went straight to a Movie category.”*
 - Channel 4 said: *“in particular, C4 agrees that film should not be a separate category. As film content is found across many general entertainment channels (eg. BBC1, ITV1, Ch4), creating a film category would not be a helpful navigation aid for viewers to find film content.”*
 - On the other hand, four respondents – YouView, Service List Registry and two confidential industry respondents – argued that Movies and Sports should each be separate Genre Categories, while TG4 argued that Sports should be a separate category or included as a News & Sport category. Two viewers also argued that one or both of Movies and Sports should be separate. The main arguments raised were that other TV platforms have separate categories for Movies and Sports, and that they anticipated significant growth in IP-delivered channels in these areas.

- Three industry respondents – News UK, Synapse and Service List Registry – argued that Faith & International should be two separate categories, on the grounds that the two types of channels are different from each other. Conversely, one viewer argued that Faith & International should not be separated out at all and that these channels should be part of the Entertainment and News categories.
- Other comments included:
 - UKTV argued that “Nostalgic kids” channels should be in the Entertainment section and not Kids, given their target adult audience.
 - News UK argued that the default genre options should be limited to an absolute minimum number of key areas that have regulatory significance, namely: News, Kids, Shopping, Radio and Adult.
 - Service List Registry and one viewer offered completely different sets of Genre Categories.
 - One viewer welcomed the fact that Shopping channels are in their own Genre Category towards the end of the EPG.

3.2.2. Consideration of responses

- Half of the industry respondents (seven of the 14) who commented on the main Genre Categories supported our proposals.
- Before turning to the specific points made on individual Genre Categories, we should reiterate the point made in the consultation document that these Genre Categories will define the Freely EPG at launch. However, it is impossible to predict exactly how the platform will develop and be used, so changes will likely need to be made over time. We will consult further on any proposed changes to Genre Categories in future reviews of the platform (see Section 5.6).
- We discussed Movies and Sports channels in detail in the consultation document. Our key points were:
 - On other platforms that have separate Movies and Sports categories, the channels are primarily pay-TV services.
 - On free TV platforms, movies and sports content is mostly consumed as part of the offering on the main Entertainment channels. This point was reinforced by the observations made by S4C and Channel 4.
 - So viewer expectations regarding these genres are significantly different on free TV platforms than on pay TV platforms.

Some respondents argued that there will be growth in IP-delivered free channels in these categories. At this point, that is a hypothetical argument and we do not know how many such channels will launch. We therefore remain of the view that our proposals best reflect viewer expectations of a free platform.

- Turning to the comments made on Faith & International:
 - This is already a small Genre Category: under our proposals, just 50 LCNs are allocated to it. Breaking this up further would mean the two Genre Categories would be smaller still, which we believe would be detrimental to the viewer experience.
 - For example, suppose we were to reserve 25 LCNs for Faith and the other 25 LCNs for International. And then consider a circumstance in which new channels were to launch that took the total number of Faith channels to 26 and International channels to ten. Under the current proposal, the 36 channels would sit under the Faith & International category with space left for further channel launches. But under the split approach, we would need to implement our processes to deal with overflows of Genre Category ranges and most likely launch a review that included adjustments to the LCN ranges (see Chapter 5) – causing disruption that could have been avoided.
 - This category exists on Freesat and works well: there is no evidence that it has caused viewer confusion. We therefore believe that it is appropriate to include a single Faith & International category on Freely.
- Regarding UKTV’s specific point about “Nostalgic kids” channels, we confirm that our definition of Children’s channels is that they comprise “programming aimed at children aged 15 or under”. As such, “Nostalgic kids” channels would not fall under this category and would likely be included as Entertainment channels.

3.2.3. Decision

- We will adopt in full our proposed main TV Genre Categories for the Freely EPG at launch.

3.3. Proposed approach for initially allocating LCNs to public service channels

- In the consultation document we stated that our first priority when allocating LCNs within each Genre Category is to fulfil the objective of ensuring the ongoing prominence of public service channels.

- Ofcom’s Code of Practice on Electronic Programme Guides (the ‘Ofcom EPG Code’)³, which is applicable to regulated EPGs under the Communications Act 2003, requires regulated EPG providers to give appropriate prominence to the relevant public service channels.⁴
- The Freely LCN Policy aligns with the rules in Ofcom’s EPG Code – which support and promote public service broadcasting in the UK – and the value to TV viewers of free public service content.
- Our proposed approach is to first assign LCNs to public service channels in the Entertainment and other relevant Genre Categories, adopting a balanced approach that also considers the benefits to viewers associated with pairing channels from the same family (see Section 3.4 below) and ensuring that the EPG offers a varied selection of channels from a range of providers.
- The specific proposals are:
 - Reserve **LCN 1-5** for the relevant local versions of BBC One, BBC Two, ITV or STV, Channel 4 (except Wales) or S4C (in Wales) and Channel 5.
 - Allocate **LCN 8** to Channel 4 in Wales, public service channels for the Nations in the other Nations where they exist (we would expect BBC Alba or BBC Scotland to be given this slot in Scotland), and to local TV in England.
 - Allocate **LCN 9** to local TV in Scotland, Wales and Northern Ireland.
 - Allocate **LCN 10-12** to the BBC for its other public service channels, ie. BBC Three, BBC Four and BBC Alba/BBC Scotland (whichever is not allocated LCN 8).
 - Allocate the **first slots in the News and Children’s sections** of the EPG to the public service channels that fall within those genres. These channels are currently: CBBC and CBeebies (assigned the first two slots in the Children’s category) and BBC News and BBC Parliament (assigned the first two slots in the News category).
- Note: throughout this document we define ‘public service channels’ as those channels identified as such in accordance with section 310 of the Communications Act 2003.
 - All other channels will be referred to as ‘non-public service channels’.

³ See <https://www.ofcom.org.uk/tv-radio-and-on-demand/broadcast-codes/epg-code>

⁴ These are currently all the BBC TV channels, Channel 3 (ITV and STV) services, Channel 4, Channel 5, S4C, local digital television programme services and simulcast local services.

- For the avoidance of doubt, channels such as ITV2 – which come from the same family as public service channels but are not themselves public service channels – do not count as public service channels and are therefore non-public service channels.

3.3.1. Consultation responses

- 11 industry respondents agreed with the proposals regarding the allocation of LCNs to public service channels: the BBC, ITV, Channel 4, Paramount, YouView, Roku, Synapse and four confidential industry respondent. One viewer also agreed with the proposals. For example:
 - The BBC stated that they: *"believe all TV platforms and devices should provide significant prominence to public service channels and public service content. We consider Everyone TV's approach ... to deliver substantially against that objective."*
 - Roku stated that they: *"fully support the principle of appropriate PSB prominence."*
- In addition, Arqiva said: *"PSB prominence is a key principle of the Freeview platform so it would be logical that the same is applied to the NGP [i.e. Freely] LCN policy."*
- News UK agreed that public service channels should be given prominence as per Ofcom's EPG Code, whilst arguing that the approach does not break new ground.
- One Box and The Dales Company supported prominence for the public service channels. But they added that: *"most people cannot recall LCNs beyond the PSBs' primary channels"* and proposed an alternative model in which each public service broadcaster is allocated a range of LCNs to allow them to keep all their channels (public service and non-public service) together.
- A confidential industry response strongly disagreed with the fact that the proposals involve reserving LCNs 6 and 7 for non-public service channels, which could result in (under the worked example presented in the consultation document) ITV2 and ITV3 occupying these slots and therefore sitting ahead of local TV channels in the EPG. It argued that this approach risks damaging the local TV sector.
- RTE and TG4 disagreed with the proposals, arguing that publicly-funded Irish channels should be treated as public service channels and given prominent LCN slots in Northern Ireland, on the grounds that they have cultural significance there. TG4 additionally asked that *"consideration be given to the possibility of automatically replacing the NI versions of RTÉ and TG4 services"*

with ROI broadcast or streamed versions in areas unable to receive Freeview version of these channels”.

- A number of further comments were made in relation to non-UK-wide public service channels:
 - The BBC welcomed the fact that public service channels aimed at a particular region or nation may be distributed (on other LCNs) across the wider UK. They expanded on this point in their response to question 2(iii), saying that they would expect that any networks that are allocated a specific LCN within a particular region as their ‘home territory’ (e.g BBC ALBA and BBC Scotland) should also be listed later in their main Genre Category so as to provide UK-wide access.
 - One respondent asked for clarification of the treatment of public service channels which serve one individual Nation of the UK: would they be able to reach the rest of the UK on a different LCN via IP, and if so how would that LCN be allocated? They also asked if such a channel can be distributed as an IP channel in its home Nation. And they asked if the channel could be given one of the LCNs reserved for public service channels outside of its home Nation.

3.3.2. Consideration of responses

- A majority of the industry respondents (11 of the 18) who commented on public service prominence supported our proposals, with a further four broadly supporting the proposals subject to caveats that go beyond the specific issue of the allocation of LCNs to public service channels.
- Regarding the confidential industry respondent’s point, we stated in the consultation document that we have deliberately adopted a balanced approach between giving prominence to public service channels whilst also considering the benefits to viewers associated with pairing channels from the same family, which reflects the range of objectives for the new Freely LCN Policy listed in Section 2.1. We note that under this approach, local TV channels on Freely will be in much more prominent LCNs than they are on any other UK platform besides those using the DTT LCN Policy (e.g. Freeview and YouView), and also that their LCNs will be in a much more prominent position than would be required by Ofcom’s EPG Code for any regulated EPG.
- A number of comments related to which channels will be treated as public service channels and therefore allocated prominent LCNs. We must emphasise that it is not our decision which channels are regarded as public service channels. In all cases, our approach is determined by the channels specified as being public service channels in the Communications Act 2003 (‘the Act’) and subsequent determinations by the Secretary of State. This means that:

- Channels which are not specified as public service channels by the Act or by the Secretary of State will not be treated as public service channels in the Freely LCN Policy.
 - Some public service channels are deemed to be public service channels only in certain Nations or regions of the UK. Outside of that area, the channel will be treated as a non-public service channel. If the broadcaster chooses to distribute a channel on Freely outside of the geographical area for which it is a public service channel, it will be allocated a separate LCN in the areas where it is treated as a non-public service channel.
 - Some channels might be deemed to be public service channels throughout the whole UK, but may be entitled to specific minimum prominence levels in a particular Nation or region (their ‘core area’). If this area-specific prominence is achieved by means of sharing an LCN with other public service channels, then the channel may be allocated a separate LCN outside of its core area. For the avoidance of doubt, it will be treated as a public service channel outside of its core area, even though it may have a less prominent slot than it has in its core area.
 - Broadcasters may offer IP-delivered versions of their channels, and these will be allocated prominent LCNs if they are public service channels and otherwise allocated LCNs as non-public service channels. (As per our technology distribution-agnostic approach, DTT and IP-delivered versions of a channel would share an LCN.)
- The comment by One Box and The Dales Company on grouping the channel families of public service broadcasters is addressed below in Section 3.4.
 - We remain of the view that our original proposals are in line with our objective for the Freely LCN Policy of ensuring the ongoing prominence of public service channels.

3.3.3. Decision

- We will adopt in full our proposals regarding the allocation of LCNs to public service channels.

3.4. Our proposed principles for ordering channels by reach and channel pairings

- The consultation document set out in detail our proposed criteria for ordering non-public service channels in each Genre Category on the EPG. This is a very important rule as it will apply to the large majority of channels on the EPG.

- Our guiding principle was to put the channels that viewers most want to watch at or near the start of the EPG (having first ensured allocated LCNs to the public service channels, as described in Section 3.3), by ordering channels according to their popularity.
- **We proposed using average weekly five-minute reach on DTT, calculated using a full year of data, as the measure of popularity used to rank each channel for the initial EPG.**
 - After launch, the channel rankings will be revised periodically as Everyone TV sees fit and based on metrics that Everyone TV considers appropriate at the time during reviews of the LCN Policy (see Section 5.6).
- The consultation document went on to address the question of whether, and to what extent, channel families⁵ should be grouped together.
 - Our audience research showed that viewers welcomed channel family groupings where appropriate, on the grounds of ‘logic’ and ‘neatness’, whilst also recognising the downside risk of crowding out other channels.
 - Groupings also provide value to content providers: the benefits of cross-promotion between channels is enhanced when there is easy navigation between them.
- We proposed adopting a middle ground between the approaches taken in the LCN Policies for Freesat, which groups several families of channels sequentially at the start of the EPG, and Freeview, which does not attempt to group complete channel families together. Our approach aimed to allow some degree of family grouping while maintaining a primarily reach-based ordering and avoiding the risk of creating perverse incentives for channel providers to create multiple IP-delivered channels in order to effectively block out sections of the EPG.
- **Our key proposal was that, alongside the principle of ordering channels by popularity using reach as the metric, we would allow each channel to bring with it a second channel from its family (the one with the next highest reach) – to create a pairing. The two channels may then swap position should the channel provider wish.**
- For the avoidance of doubt, when a channel family comprises a mixture of public service channels and non-public service channels, non-public service

⁵ The definition of ‘channel families’ is two or more channels that are classified into the same Genre Category as each other; and are under common control; and have common branding and/or a significant degree of existing or intended cross-promotion.

channels cannot take advantage of rules relating to channel families that would put them into a more prominent LCN due to their association with public service channels in their channel family.

3.4.1. Consultation responses

Ordering channels by reach

- Eight industry respondents agreed with the proposals on ordering channels by reach: the BBC, ITV, Channel 4, Paramount, UKTV, YouView, News UK and Roku. One viewer also agreed with the proposals. For example:
 - The BBC said: *“We consider Everyone TV’s approach to be innovative and entirely appropriate for an internet-connected platform and should help in one way to deliver against Everyone TV’s audience focus”.*
- Arqiva stated that: *“Any policy which uses reach as the primary mechanism needs to be fair and reasonable to all services so it will need to be robust based on verifiable third-party data.”*
- A confidential industry respondent agreed with the principle of ordering channels by reach but added that data based on IP viewing and not solely BARB data should also be used for IP channels.
- Another confidential industry response was supportive of the ordering of channels by a method of popularity but argued that share of viewing should be used rather than reach. Their view was that viewing share is a better measure of popularity while reach is open to manipulation by channels in the run-up to the periodic reviews of the LCN Policy when LCNs will be reallocated.
- A number of respondents did not agree with the overall approach:
 - A confidential industry response disagreed with the proposals, in line with its overarching argument that the new platform should use the DTT Policy (see above).
 - Synapse disagreed with the proposals, in line with its overarching argument that the LCN Policy should be *“as consistent as possible across all Freeview sub-platforms”*, adding that it does not agree with *“the principle of micro-adjusting channel LCN allocation on the basis of BARB reach data”*.
 - Another confidential industry response argued that a reach-based approach only really serves a purpose for *“potentially the top couple of dozen or so services, (maybe up to LCN 24). Beyond that, in the long tail of services there is in reality very little meaningful differentiation and consumers look for variety and alternatives and not an endless list of me-too type channels, artificially ordered by reach”*.

- One Box and The Dales Company argued that ordering by reach “*will lead to continual LCN reassignments, all it takes is one hit show on a low reach channel to cause chaos. LCN reassignments prevent long term marketing of LCN’s and reach-gaming the system.*” They added that the proposal “*leaves some channels orphaned in the EPG ghetto with little ability to recall LCN’s*”.
- Service List Registry argued that using reach “*is flawed as it only reflects one dimension of the importance of a service*”. It proposed “*a system of weighted factors be used to order services within a category, providing appropriate stability to the numbering system while allowing for changes in response to viewer demand*”.
- TG4 and RTE disagreed given the implications for their Irish channels. TG4 stated that the proposals may seem reasonable at first glance. But as the RTE and TG4 channels are not measured by BARB, there would be no BARB reach data for these channels, and they would be allocated LCNs only at the end of the EPG with other channels that do not have reach data – an approach they regard as discriminatory.
- There were a number of comments and queries on the details of the methodology for ordering channels:
 - A confidential response from a broadcaster argued that the latest data for 2023 should be used, while UKTV argued that 2022 data should be used.
 - UKTV argued that time-shift channels should count towards the reach calculation for each channel.
 - RTE argued that for BARB-measured channels only available in a Nation, Nation-specific reach should be used as UK reach is inappropriate.
 - Synapse disagreed with using BARB data to assign LCNs, claiming that BARB has “*well known deficiencies*”. It added that: “*The reliance on BARB data for LCN ordering may also be seen as a commercial barrier to entry for many content-owners, so this is a concern*”.
 - UKTV asked what the approach would be for IP-delivered channels at the point of launch that are not on DTT or measured by BARB.
 - YouView asks to clarify whether our review of channel rankings forms part of the periodic LCN reviews (see Section 5.6).

Pairing of channels in the same family

- Seven industry respondents agreed with the proposals on the channel pairings: the BBC, ITV, Channel 4, Paramount, UKTV, Roku and one confidential response from a broadcaster. One viewer also agreed with the proposals. For example:
 - The BBC said: *"we consider Everyone TV's nuanced approach to be an appropriate middle ground – having some service adjacency should allow content providers with multiple linear channel offerings to be able to cross-promote between their services."*
 - The confidential response from a broadcaster said: *"This allows for family channels to complement each other and drive viewing."*
- A confidential industry response also agreed with the proposals, provided that pairing does not take precedence over individual channels that cannot pair up and have a greater reach.
- A number of respondents did not agree with channel pairings:
 - News UK disagreed with the proposals to allow channel pairing or channel swapping, arguing that the platform should adopt a completely pure reach-based approach.
 - A confidential industry response disagreed with the proposals, in line with its argument that the new platform should use the DTT Policy (see above).
 - Synapse disagreed with the proposals, in line with its overarching argument that the LCN Policy should be "as consistent as possible across all Freeview sub-platforms".
 - Service List Registry described the proposals as *"a peculiarly esoteric system that appears to offer little benefit to viewers"*.
- YouView asked: *"Currently it states that pairing rules are not needed for News and Children's because these are all BBC Channels. In the event that non-BBC channels become part of these sections, will pairing rules apply?"*
- Arqiva stated: *"We note the proposals around channel swapping and look forward to further details on how this will be implemented in a manner which is fair and clear to all channels. It will be important to ensure that the channel ordering rules remain attractive to both broadcasters with multi-channel line-ups as well as those with single channels."*

3.4.2. Consideration of responses

Ordering channels by reach

- Just under half of the industry respondents (nine of the 19) who commented on the ordering of channels by reach supported our proposals.
- Of the remainder, two respondents were supportive of the ordering of channels by a method of popularity but suggested different means of measuring popularity, either using BARB viewing share (rather than reach) and/or also IP viewing data for IP channels. Six respondents disagreed with the overall approach, while two disagreed because of the implications for Irish channels.
- Starting with the suggestion that we should use BARB viewing share to measure popularity, we discussed the relative merits of reach and share in the consultation document:
 - We argued in favour of reach because a channel’s reach is higher when lots of people watch it sometimes, meaning lots of people want to navigate to the channel using the EPG.
 - Conversely, a channel can achieve a high viewing share if a smaller number of people watch it a lot, in which case these heavy viewers of the channel tend not to need to use the EPG so often; and when they do, they are less likely to pay attention to the order of channels.

The arguments presented to us have not persuaded us to change our original position. We specifically disagree with the suggestion that reach is open to manipulation: the proposed measure is average weekly reach measured over a full year (as distinct from total annual reach), so a short-term boost to a channel’s weekly reach would have only a minimal impact on the average weekly reach over the year.

- In response to the proposal by a confidential industry respondent to use IP viewing data to measure IP channels, at the point of launch there is no established comprehensive system for measuring combined DTT and IP reach for all channels. Therefore the proposal would not be viable at this stage even if we wished to pursue it. At the first periodic review post launch we will assess the best way to measure popularity when we reallocate LCNs, and it is possible that we may include new metrics (see Section 5.6).
- Most of the respondents who disagreed with our proposal for channel ordering by reach based this on their overall disagreement with the need for a new LCN Policy for Freely, as discussed in Sections 2.1 and Section 3.1 above.

- Regarding the proposal from Service List Registry, we believe that their suggestion to use weighted factors would be too complicated and cause considerable confusion for channel providers.
- We discussed the status of the publicly-funded Irish channels from TG4 and RTE in Section 3.3 above. These channels are not currently designated as public service channels in the UK. Accordingly, unless and until they are designated as public service channels in the UK (or any part of the UK), they will be treated on the same basis as non-public service channels. As the reach of these channels is not measured by BARB, these channels would be treated in the same way as other channels for which no BARB data exists (see Section 4.3 below).
- Turning to the specific comments and queries, we have now announced the launch of Freely in early 2024, and preparation needs to take place ahead of launch. Channel providers need reasonable notice, and there will be a period of time before final full-year data for 2023 will be available. Given that the consultation used 2022 data, our view is that the most practical solution is to base the launch EPG on the same data set for calendar year 2022. That will provide a measure of immediate certainty for all stakeholders.
- UKTV asked if time-shift channels count towards the reach calculation for each channel. We treat time-shift channels as separate channels, with their own LCN range on the EPG. These channels will not be included in the measurement of their parent channels' reach. (Our rules for the ordering of the time-shift channels are covered in Section 4.3 below.)
- RTE argued that for BARB-measured channels only available in a Nation, Nation-specific reach should be used as UK reach is inappropriate. Other than a small number of channels that are local or Nations-specific, discussed in Section 3.3 above, the EPG will be identical and consistent for all UK users. This requires us to use a common UK-wide measure of reach for all channels.
- Synapse disagreed with using BARB data to assign LCNs, claiming that BARB has “well known deficiencies”. It added that: “The reliance on BARB data for LCN ordering may also be seen as a commercial barrier to entry for many content-owners, so this is a concern”.
 - On the first point, BARB is the longstanding and well-established metric used by TV companies to measure the performance of their services. It is not for Everyone TV to question the reliability of BARB data.
 - On the second point, we recognised in the consultation document that in some Genre Categories, such as Shopping, few channels have their reach measured by BARB. In these categories, we acknowledge that reach-based criteria might be perceived to give those channels which

are measured by BARB an unfair advantage over non-BARB-measured providers in the same category, who might feel they need to bear the cost of joining BARB to improve their EPG position even if the reach data were otherwise of no value to them (see Section 4.3 below). We do not therefore intend to apply reach-based criteria in those Genre Categories.

- UKTV asked what the approach would be for IP-delivered channels at the point of launch that are not on DTT or measured by BARB. Our response is:
 - We anticipate that there may be a considerable number of new IP-only channels that would wish to be on the Freely EPG at launch.
 - In the consultation document, we did not explicitly make proposals to cover the allocation of LCNs to IP-only channels in the ‘launch queue’ and agree that a specific rule is needed for this.
 - We have developed an approach that builds on the principles we have used elsewhere in the Freely LCN Policy. IP-only channels will be allocated LCNs after the allocation of LCNs to existing DTT channels, using the following approach to identify the list of channels and then offer LCNs to each one:
 - We will write to all channel providers who have signed content partner agreements for Freely, and who have therefore accepted all the commercial and technical terms to provide IP channels at launch, and inform them of the date of the ‘decision day’ for determining the ‘launch queue’.
 - By that date, channel providers will be required to provide to us the names of all the IP-only channels that they wish to put into our launch queue.
 - We will then offer LCNs to channel providers in pairs of IP-only channels (i.e. two channels at a time if they have two, or otherwise just one), with the channel providers ordered on the basis of the position of their first already-allocated channel on the LCN list which is in use in the majority of the UK; channel providers that do not have any LCN that is used in the majority of the UK will be ordered behind those that do, in the order of their first LCN that is used in the minority of the UK.
 - Once all channel providers have had their first pair of IP-only channels (or single channel if they only have one) allocated, the process will begin again from the first channel provider, and so on until all IP-only channels have been allocated.

- This process will apply separately in each Genre Category.
- Channel providers will be able to hold these LCNs for a period of time before launching their channel.
- Channel providers may not trade an LCN that has been allocated according to this process, until they have been broadcasting content appropriate to the Genre Category on the LCN for at least 12 months.
 - Following the initial allocation of channels on Freely, our general approach is that new IP-only channels will be listed on a first come first served basis within their relevant Genre Category.
- YouView asked us to clarify whether our review of channel rankings forms part of the period LCN reviews. We can confirm that this is the case (see Section 5.6).

Pairing of channels in the same family

- A majority (eight of the 12) of those industry respondents who expressed a view on channel pairings supported our proposals.
- Of those eight, one confidential industry respondent supported the proposal subject to the proviso that pairing does not take precedence over individual channels that cannot pair up and have a greater reach. We can confirm that this is the case: individual channels will always be able to accept an LCN that they are offered regardless of whether they can then make a pairing.
- Most of the respondents who disagreed with our proposals in relation to pairing based this on their overall disagreement with the need for a new LCN Policy for Freely, as discussed in Section 2.1 and Section 3.1 above.
- Regarding the other points of disagreement, we explained our view in the consultation document that the pairing rule represents a nuanced approach to address the trade-off between the principle of allocating channels by reach and allowing channels in the same family to sit together than either extreme (no family groupings at all and whole portfolio family groupings). We have considered the arguments raised by respondents contrary to this view and are not persuaded that we should change our position.
- Turning to YouView’s request for clarification, we can clarify that we will always apply the pairing rules in the usual way to all channel providers in those Genre Categories for which pairing is permitted (namely, those Genre Categories in which channels are ordered by reach, which we list in full in Section 4.3).
- In summary, the proposals – on both reach and pairings – raised a wide number of issues that we have considered carefully. Our view is that our proposals are

in line with the objectives for the Freely LCN Policy of making it easy for viewers to discover content through simple navigation and giving channel providers the opportunity to reach viewers.

3.4.3. Decisions

- We will adopt in full our proposals for ordering channels by reach and allowing channel pairings.
- For the launch EPG, we will use data for calendar year 2022 as the basis of our reach-based ranking of channels.

4. Details of LCN Policy

4.1. Proposed EPG categories and range of LCNs assigned to each one

- Having covered the main TV Genre Categories in the previous chapter – Entertainment, News, Children’s, Music, Shopping and Faith & International – this section covers the full set of Genre Categories, the LCNs to be assigned to each one, and specific rules that apply to them.

Overarching points

- The consultation document stated that the overall approach is for the mainstream Genre Categories to appear at the start of the EPG, beginning with Entertainment followed by the other main TV genres. Niche or specialist TV channels and Radio come towards the latter end of the EPG, along with categories such as Regional channel variants.
- As a point of difference from the DTT LCN Policy, our proposals involved not creating a separate HD Genre Category, as alternative versions of the same channel – whether broadcast or IP-delivered and whether HD or SD – will be allocated to the same LCN, and only one version of the channel made available to users⁶.
 - Which version is listed is at the election of the channel provider and will also be determined by the technical set-up of the device (e.g. whether connected to an aerial for DTT).
- For each section of the EPG, we proposed reserving the first LCN (usually with 0 as the last digit) for genre navigation or other features, and then the allocation of EPG slots for channels in that section will start with the next LCN.
 - For example, in the Music section LCN 400 would not be allocated to a channel and the first Music channel would be given LCN 401.
- In determining the number of slots to allocate to each category, we considered the likely growth of content in each area to future-proof the EPG as much as possible.
 - Post-launch, we said that we would expect the biggest area of uncertainty in demand for LCNs in the years ahead to be the development of IP-delivered channels, as this would represent an entirely new category on the platform.

⁶ Except in some limited circumstances, as described in Section 4.1.2, under the heading “LCN allocations when there are alternative versions of a single channel”

- Should growth be faster than expected, and we need to allocate more LCNs to certain types of content, we would retain the option to amend the EPG categories and LCN ranges ahead of any formal periodic LCN Reviews and would undertake a mid-term mini review to do this (see Section 5.6).

Complete list of Genre Categories and LCN ranges

- The table below shows the full set of LCN allocations as set out in the consultation document, with a summary of key details for each category.

Genre/LCN Range	Description and proposed rules
Entertainment 1-30, 32-89, 101-249	<ul style="list-style-type: none"> ● Main TV Genre Category (see previous Chapter).
Promotional 31, 90-99	<ul style="list-style-type: none"> ● Reserved for promotional purposes.
Platform info 100	<ul style="list-style-type: none"> ● Reserved for platform information.
Time-shift (+1 channels) 250-299	<ul style="list-style-type: none"> ● For Time-shift variants of Entertainment channels only, making them easier to find while helping to declutter the Entertainment category. ● Channels to be allocated LCNs in the same order as their parent channels appear in the Entertainment category. ● Any non-Entertainment-based Time-shift channels to remain in their parent channels' genre sections and treated as separate channels in their own right in those sections.
Children's / News TBC 300-349	<ul style="list-style-type: none"> ● Main TV Genre Category (see previous Chapter). ● See Section 4.2 for the order of these categories.
News / Children's TBC 350-399	<ul style="list-style-type: none"> ● Main TV Genre Category (see previous Chapter). ● See Section 4.2 for the order of these categories.
Music 400-449	<ul style="list-style-type: none"> ● Main TV Genre Category (see previous Chapter).
Shopping 450-499	<ul style="list-style-type: none"> ● Main TV Genre Category (see previous Chapter).
Faith & International 500-549	<ul style="list-style-type: none"> ● Main TV Genre Category (see previous Chapter).

Genre/LCN Range	Description and proposed rules
<p>Hybrid Streamed + Text if needed 550-554, 556-579</p>	<ul style="list-style-type: none"> Hybrid Streamed channels are distinct from Freely-approved IP-delivered channels: they are channels where audio-visual content is delivered over IP but access is enabled via an MHEG or HbbTV application that is broadcast over DTT. Will remain available and allocated LCN slots in their own area of the EPG (as is the case in the DTT LCN Policy). Two exceptions to the rule that only Freely-approved IP-delivered channels may sit alongside other DTT and DSat channels. To keep children’s content away from potentially harmful content, Hybrid Streamed Children’s channels will appear in the Children’s Genre Category, and Hybrid Streamed Adult channels will appear in the Adult Genre Category (as is the case in the DTT LCN Policy).
<p>Accessible EPG 555</p>	<ul style="list-style-type: none"> Reserved for Accessible EPG. Same LCN reserved as on Freeview Play.
<p>Adult 580-599</p>	<ul style="list-style-type: none"> Channels which contain content of an adult nature, such that it features the depiction or description of, or behaviour of, a sexual or sexually suggestive nature, especially if this is of a lascivious nature. Includes the exhibition or depiction of sexual organs or sexual activity of any kind. Adult channels to be allocated LCNs in an Adult category with a range located well away from Children’s channels in the higher reaches of the EPG. Range to be book-ended by a genre slate in line with protective measures taken on other platforms. When considering if a channel should be listed in the Adult category, we will consider the amount and nature of programming which is of an adult nature that is broadcast on to that channel. For the avoidance of doubt, transactional sex chat channels (or ‘Adult Chat’ services) will be located in the Adult category.
<p>Radio 600-749</p>	<ul style="list-style-type: none"> LCN allocation to be expanded from 50 slots on Freeview to 150, given potential of IP delivery. For detailed rules on allocation of LCNs, see below.

Genre/LCN Range	Description and proposed rules
Regional variants 750-799	<ul style="list-style-type: none"> • To manage the provision of regional variants of public service channels when connected to DSat. For channels with different regional versions, each variant is included on the DSat platform in the higher reaches of the EPG, with the correct local variant mapped to the channel’s main LCN. • Freely to adopt a similar approach for users connected to DSat, with a range of LCNs for the different versions of those channels with regional variants (primarily BBC One and BBC Two), and the correct local variants mapped to those channels’ main LCNs. • Viewers can watch local programmes from a different region by accessing the channels in this LCN range.
Manufacturer Technical Use 800-999	<ul style="list-style-type: none"> • To manage the situation when a viewer lives near the border between two TV regions and their DTT-connected device can pick up more than one version of a channel with regional variants. • Freely to follow similar approach to Freeview, with the device asking the user – when they first tune their device – which version of the channel to put at LCN 1 (in BBC One’s case), and the other version then allocated a slot in the 800s range.
IP channels delivered by manufacturers 1001+	<ul style="list-style-type: none"> • Distinct category from both Freely-approved IP-delivered channels and Hybrid Streamed channels. • Need to create sufficient space on Freely for these channels in their own section, to encourage innovation in the creation of new services by manufacturers, who will be key players in the roll-out of the new platform. • For the avoidance of doubt, Everyone TV will not allocate LCNs within this range, which is managed by the manufacturers themselves according to their own allocation policies. This range does not form part of the Freely LCN Policy. • Manufacturers to determine their own criteria for allocating LCNs to channels within their allocated range. The expectation is that IP channels delivered by manufacturers will not be the same across all devices, as manufacturers are likely to offer different channels from each other as part of their product differentiation.

Allocation of LCNs to Radio channels – proposed rules

- BBC stations will appear first, in the order determined by the numbers in the station names (i.e. Radio 1, Radio 1Xtra, Radio 2, Radio 3, Radio 4, Radio 4 Extra, Radio 5 Live, Radio 5 Sports Extra, Radio 6 Music, Asian Network) followed by the World Service.
- Seven LCN slots are then reserved for BBC Local Radio services in the household's local area (as determined by DTT transmitter coverage).
 - For example, someone living in Wales might have the three local LCN slots allocated to BBC Radio Wales, Radio Cymru and Radio Cymru 2 (the other four reserved slots would be vacant).
- The next set of slots would be allocated to commercial radio stations, ranked according to popularity, mirroring the approach used to order TV channels.
- We will measure reach based on quarterly listening data as provided by RAJAR, and calculate annual reach for each station based on the average of four quarterly figures to cover a full year.
 - For local radio stations with multiple versions with regional opt-outs or which together form a multi-region network, we will look at aggregate reach across all local versions.
 - We will use the equivalent “pairing” rule for radio as for TV, so each radio station allocated a slot can bring with it a single additional station from the same family.
 - If commercial radio providers wish to offer more than one regional variant of a radio station on the platform then the radio station would be allocated a single LCN and the provider may use that slot for the different variants around the UK (as with the different ITV regions on LCN 3).
- The full list of BBC Local Radio services would begin around 50 slots from the end of the initially allocated range (e.g. around LCN 700 if Radio is allocated the LCN range 600-749). Up to seven of these services will be mapped onto prominent LCNs towards the start of the Radio Genre Category, see above.
 - We would not expect users to select these LCNs often, as they would be able to access their local services using the seven reserved slots. But there may be instances when some people may wish to listen to other local stations, for example if they have a favourite show from another region where they lived previously.

- We proposed that these BBC Local Radio channels should be listed alphabetically, to assist user navigation, but we are open to alternative proposals.

4.1.1. Consultation responses

Overarching comments

- Four industry respondents supported the full set of proposals for EPG categories and the range of LCNs assigned to each one: the BBC, ITV, Channel 4 and Paramount.
 - The BBC advised *“that the policy should afford Everyone TV the flexibility to amend the genres and the ranges allocated over time, particularly for [a platform] that in effect would operate over the internet and which would be unhindered by the broadcast capacity constraints that effectively serve to control the number of channels and the types of genre typically covered by broadcast TV linear channels”*.
- In addition, TG4 stated that the *“proposed order of EPG categories seems appropriate”*, and YouView agreed with the proposed Genre Categories subject to its comments on Movies and Sports covered in the previous chapter.
- Three further industry respondents – YouView and two confidential industry respondents – specifically supported the proposal that there be no separate HD category, with HD and SD variants of a channel sharing a single LCN.
- Five respondents disagreed with the overall approach:
 - News UK argued that Genres should be limited to an absolute minimum, comprising just News, Kids, Shopping, Radio and Adult.
 - Service List Registry suggested a completely different sets of Genre Categories (as discussed in Section 3.2).
 - One Box and The Dales Company argued that it will lead to *“diminishing channels in Genre ‘Ghettos’, where a whole genre may have only a few channels and will also lead to Entertainment becoming a mega-genre, overpopulated and an inability to discover genre based content on generic entertainment based channels”*.
 - A confidential industry response disagreed with the proposals, in line with its overarching argument that the new platform should use the DTT Policy (see earlier sections).
- Regarding the proposal that we would retain the option to amend the EPG categories and LCN ranges ahead of any formal periodic LCN Reviews, a confidential response from a broadcaster argued that: *“Reserving the right to make adjustments and reorder the LCN at any time to allow for placement of*

new channels will likely be confusing to the viewer and also create incremental cost to the channels in changing marketing and promotional materials if this is a frequent occurrence. There does need to be some degree of timeliness to this."

- We also received comments on specific LCN allocations, which we detail below.
- Further, we received queries on details of how the approach for allocating alternative versions of the same channel to a single LCN will work in practice.

LCNs reserved for promotional purposes and platform information

- Several industry respondents questioned the number of slots and specific LCNs allocated to promotional channels:
 - LG and Synapse both argued that there are too many LCNs allocated to promo channels.
 - Arqiva argued that LCN 31 specifically "*will be a valuable position for a general entertainment channel and this slot should be retained for that genre rather than for promotion*", though they explicitly supported the use of LCNs 100 and 555 for platform information and the accessible EPG.
 - Service List Registry suggested reserving LCN 200 for promotional use instead of lower LCNs, and potentially also other slots ending 00, e.g. 300, 400, etc.
- Three respondents – Sky, UKTV and a confidential industry response – asked for greater clarity on these channels. In addition, YouView asked if there will be a consultation on how these channels will be used.

Time-shift channels

- UKTV stated that they agreed with the proposals regarding Time-shift channels, adding that there should be "*an easy way for viewers to navigate from the parent channel to the time-shift variant*". They suggested that Time-shift channels should be ranked by the order of their parent channels rather than by reach.
- Service List Registry argued that Time-shift channels should be given LCNs so that each channel is offset from its parent channel by 100 or 200. One viewer made a similar point.
- One respondent, Arqiva, disagreed that Time-shift channels should be a separate Genre Category, arguing the channels should be in their parent channels' Genre Categories. They claimed the proposed approach is "*artificial and unnecessary*", "*confusing to viewers*" and will "*damage and undermine the business case for these channels*".

- Synapse argued that Time-shift channels should not be given LCNs at all, and that access to them should be handled by the platform.

Hybrid Streamed

- Three industry respondents – News UK, Synapse and Service List Registry – argued that Hybrid Streamed channels should be included with other Genre Categories and not separated out:
 - News UK and Service List Registry argued that the proposed approach defeats the object of being platform-agnostic.
 - Synapse claimed that *“Hybrid Streaming services present no more difficulty for the viewer than broadcast-only services”*, adding that Hybrid Streamed audio should likewise be placed in the Radio Genre Category.
 - Synapse added a technical note on the potential future delivery of Hybrid Streamed channels, saying that: *“The channel signalling for the hybrid channels could include an XML AIT, which is a standard feature on other platforms. This would make hybrid channels purely IP”* – which would allow such channels to operate without relying on DTT.
- Synapse noted that the capacity for this category has been reduced compared to that on Freeview, from 39 LCNs on Freeview to fewer than 30 on Freely. They argued that the category should be allowed to grow, and concluded that *“it should at least ensure that Freeview and Freeview-NGP [i.e. Freely] platforms are able to present all existing Hybrid Streaming services and ensure sufficient additional space is allocated to ensure future growth based on current projections”*.
- Synapse argued that the Hybrid Streamed Genre Category should not be placed next to Adult – this is covered under “Adult” below.

Adult

- Three industry respondents commented on the placement of the Adult Genre Category:
 - A confidential industry response said: *“Radio followed by adult channels should always be at the bottom of the EPG”*.
 - Service List Registry objected to its proximity to Radio, which may include young people’s content.
 - Synapse argued that the Hybrid Streamed Genre Category should not be placed next to Adult, as Hybrid Streamed services offer *“an array of different types of content with a large and diverse viewership including many services that attract younger audiences”*.

- Synapse argued that Adult is a diminishing category on Freeview, and that the allocation for Adult services on Freely should be reduced.
- Some respondents argued that Adult channels should sit behind a firewall or other mechanism to protect children from accessing them.

Radio

- News UK argued that radio channels should be ordered using the same criteria as for TV, claiming that there is no objective basis to allocate the top slots to BBC radio channels.
- Synapse asked if 150 LCNs slots are needed, and if this is based on our expected growth in the category, adding that if not needed the LCNs could be used for other genres.
- One viewer argued that there should be a way for community radio stations to have access to the platform.
- RTE and TG4 highlighted RTÉ Raidió na Gaeltachta, a publicly-funded Irish language radio station. RTE noted that in Northern Ireland, there are just two BBC radio stations, BBC Radio Ulster and BBC Radio Foyle, so five of the seven reserved slots for local radio will be vacant. They asked if this radio station could be listed in one of these slots, to recognise the cultural significance of the radio station and make efficient use of LCNs. TG4 similarly asked that consideration be given to the prominence of its channel in Northern Ireland.

IP channels delivered by manufacturers

- Two industry respondents – News UK and a confidential response from a manufacturer – argued that Manufacturers’ channels should be included with other Genre Categories and not separated out:
 - News UK and the confidential respondent both argued that the proposed approach defeats the object of being platform-agnostic.
 - The confidential respondent proposed allocating a block of at least 50 LCNs to manufacturers in the 100-500 LCN range or alternatively 10-20 LCNs in each Genre Category.
- YouView argued that the LCN range for Manufacturers’ channels should be in a more prominent position (closer to the start of the EPG) than Adult, Radio, Regional Variants and Manufacturer Technical Use, *“in order to make it as easy as possible for viewers to discover content and protect consumers from potential harm (a user going through the EPG would have to go through the Adult section to get to these IP channels which may include Children’s channels)”*.

- Two respondents – YouView and a confidential industry response – sought clarifications on whether pay TV platforms would be treated as “manufacturers” if they chose to use Freely as the basis of a pay TV platform in the future, and if not, sought clarification on which LCN range would be available to them to allocate LCNs to their pay-TV channels (the confidential respondent argued that the range should begin no lower than LCN 300).

4.1.2. Consideration of responses

- Almost half (four of the nine) industry respondents who commented on the overall proposals expressed full support for them: the BBC, ITV, Channel 4 and Paramount.
- In addition, there was support from YouView for the proposed Genre Categories subject to its earlier comments on Movies and Sports, from TG4 for the proposed order of Genre Categories, and from three respondents – YouView and two confidential industry respondents – for the proposal that there be no separate HD category, with HD and SD variants of a channel sharing a single LCN.
- Five respondents disagreed with the overall approach: News UK, Service List Registry, One Box, The Dales Company and a confidential industry respondent. In each case, their objection comes from their overarching objections to the Policy; see Chapter 3 for our consideration of these points.
- A confidential response from a broadcaster was concerned about viewer confusion due to our reserving the right to make adjustments and reorder the LCN at any time to allow for placement of new channels. We stated that we would retain the option to amend the EPG categories and LCN ranges ahead of any formal periodic LCN Reviews and would undertake a mid-term mini review to do this. Such mid-term reviews are discussed below in Section 5.6.

LCNs reserved for promotional purposes and platform information

- We note the comments of those respondents who argued that there are too many LCNs reserved for promotional purposes, especially in the first 100 slots, and requested more information on the promotional channels. However, we continue to believe that the number of channels reserved for promotional slots is appropriate. Everyone TV will announce details of how the promotional LCNs will be used in the coming months.

Time-shift channels

- In response to the comments that suggested that Time-shift channels should be given LCNs that are offset from their parent channel by 100 or 200, we appreciate that making it easier for viewers to remember these channels’ LCNs may be a positive benefit. However, in practice this would represent an

inefficient use of LCN ranges as it would raise the question of what to do with the many LCNs that would remain between those of the Time-shift channels, given that only a subset of Entertainment channels has Time-shift variants. Our view is that the net benefit of the suggestion would therefore be negative after taking these inefficiencies into account.

- Regarding the suggestion from Arqiva that Time-shift channels should be in their parent channels’ Genre Categories, we continue to believe that our proposed approach makes them easier to find in line with our objectives for the Freely LCN Policy.
- Regarding Synapse’s suggestion that Time-shift channels should not be allocated LCNs, we disagree, as they remain distinct channels and should be able to be accessed as channels in the normal way, with their own LCNs on the EPG.
- We note UKTV’s comment that Time-shift channels should be allocated LCNs in the same order as their parent channels appear and not by reach – this is in line with our proposal. UKTV’s other suggestion – that there should be an easy way for viewers to navigate between a parent channel and its time-shift variant – is out of scope of this consultation.

Hybrid Streamed

- Three industry respondents argued that Hybrid Streamed channels should be included with other Genre Categories and not separated out, arguing it runs counter to our platform-agnostic approach.
 - We explained in the consultation document that the approach to integrate Freely-approved IP-delivered channels is intended to offer a seamless viewer experience. This is the fundamental point of the new platform.
 - We also stated that by “technology-neutral”, we mean not discriminating between broadcast (DTT or satellite) and Freely-approved IP-delivered channels.
 - Hybrid Streamed channels are partly reliant on DTT for delivery, and as such do not contribute to meeting our objective for the Freely LCN Policy to make it easier for viewers to transition to IP-only delivery for free TV in the years ahead. If such a channel ceased to rely on DTT then it would (by definition) cease to a Hybrid Streamed channel, but that would not automatically make it a Freely-approved IP channel. It would however be open to such IP channels to bring themselves into conformance with the requirements of Freely and be allocated an LCN in their relevant Genre Category.

- We note Synapse’s observation that our proposals as set out in the consultation document reduce the LCN range for Hybrid Streamed channels from 39 LCNs in the DTT LCN Policy to 29 LCNs.
 - Having carefully considered Synapse's argument, we agree Hybrid Streamed channels should have at least the same capacity as they currently do within the DTT LCN Policy, and enough to allow some growth.
 - We also accept Synapse’s point that Adult is a diminishing Genre Category on DTT and Freesat and therefore some slots could be reallocated from Adult to Hybrid Streamed. We have also taken the view that we can reallocate some slots from Radio.
 - We have therefore decided to move ten LCNs from each of Adult and Radio to Hybrid Streamed, giving Hybrid Streamed an additional 20 slots, so that under the revised listing Hybrid Streamed runs from LCN 550 up to LCN 599 instead of 579. Text services will also be allocated LCNs within this genre: there is currently only one Text service, and no new Text services have launched on DTT in recent years.

Adult

- Regarding the comments made on the position of the Adult Genre Category in the EPG, we deliberately positioned it towards the end of the EPG, and there will be markers either side to reduce the risk of users navigating from the adjacent Genre Categories to Adult content. However, we acknowledge the argument that, given its subject matter, this Genre Category should be placed closer towards the end of the EPG. We have therefore decided it would be appropriate to move the Adult Genre Category so it comes after Radio.
- As covered above in relation to Hybrid Streamed channels, we accept the argument that the number of Adult services has reduced over time, and therefore some slots could be reallocated from Adult to Hybrid Streamed. We have therefore decided that:
 - We will reduce the Adult section by ten LCNs.
 - This will leave Adult with ten LCNs, of which the first and last will be slates marking the start and end of the genre, as is the case on the DTT platform. Also in line with the DTT platform, we will use additional genre markers at the end of the Adult section to increase the number of ‘clicks’ required to scroll backwards from a radio service to an adult service.
 - We believe this is a sufficient number of LCNs for Adult services, given the current and likely future demand for LCNs in this category.

- Following these changes, the Adult Genre Category will be allocated LCNs 740-749.

Radio

- We disagree with News UK’s suggestion that radio channels should be ordered using the same criteria as for TV, using reach. Our view is that audiences expect the BBC national channels to appear first in a logical order.
- Regarding Synapse’s question about whether 150 LCNs slots are needed for Radio, our view is that IP-delivery represents an attractive opportunity for radio stations to launch on the platform. However, to allow for growth in other Genre Categories where we had not allocated additional LCNs, we have decided to reallocate ten of these slots to Hybrid Streamed on the initial EPG. As a result, Radio will be allocated LCNs 600-739. Post-launch, we will review the LCN allocations to each Genre Category in the first periodic Review of the LCN Policy (see Section 5.6).
- RTE and TG4 asked if RTÉ Raidió na Gaeltachta could be listed in prominent slots in Northern Ireland. We do not believe this could be justified on the grounds of audience expectations.
- One viewer argued that there should be a way for community radio stations to have access to the platform. Community radio channels may apply to join the platform subject to meeting the platform’s commercial, technical, regulatory and other requirements: interested parties should engage with Everyone TV.

IP channels delivered by manufacturers

- Two industry respondents argued that Manufacturers’ channels should be included with other Genre Categories and not separated out, arguing it runs counter to our platform-agnostic approach.
 - As we explained in the consultation document, by “technology-neutral” we mean not discriminating between broadcast (DTT or satellite) and Freely-approved IP-delivered channels.
 - As manufacturers will use the LCNs allocated to them in different ways, the parts of the EPG that comprise their channels will vary from one device to another. It will be up to manufacturers to set their own LCN Policies for those parts of the EPG.
 - Integrating Manufacturers’ channels into other Genre Categories would result in different viewers seeing different channels. Manufacturers’ IP channels would not be Freely-approved IP-delivered channels, so this would prevent us providing a seamless user experience.

- Our manufacturer partners are very likely to have their own incentives to ensure that their viewers have a high quality experience, including that viewers are able to easily access the most popular services. However, manufacturers might not be obliged to follow the EPG Code – including the requirement to place public service channels in prominent LCN positions – whereas the Freely LCN Policy will align with that Code. It is therefore important that the Freely range of LCNs must always appear ahead of the LCNs allocated by Manufacturers. Thus the Freely EPG will run from LCNs 1 to 999, and the Manufacturers’ EPG will start from LCN 1001. We will put product features in place (e.g. clear branding of the EPG) to differentiate between the Freely range and the Manufacturers’ range, to help viewers understand which LCNs are under Freely’s control and which are not. We will also ensure that the primacy of the Freely range (including prominent LCNs for public service channels) is respected in the implementation of the Freely User Interface on all Freely devices.
- These arguments together explain why we have allocated an unlimited block of LCNs for manufacturers at the end of the EPG, in an area in which manufacturers have complete freedom to distribute channels of their choosing under LCN Policies of their choosing, without impacting this LCN Policy or the seamless viewer experience that will be provided in the parts of the EPG covered by this LCN Policy.
- Regarding the clarifications sought by YouView and a confidential respondent, the applicability of the Freely LCN Policy to vertically-integrated platforms in the future is out of scope of this consultation. Everyone TV will discuss directly with parties proposing to launch such platforms.

LCN allocations when there are alternative versions of a single channel

- In response to queries on how the approach for allocating alternative versions of the same channel to a single LCN will work in practice, we can provide further details over and above what we said in the consultation document.
- A Freely device may have access to two or more versions of any given channel for a number of reasons:
 - **Distribution technology.** If the device is connected to a broadcast (DTT or, when it is available, DSat) technology as well as to the internet, there may be broadcast and IP-delivered versions of some channels.
 - **Video format.** There may be different versions of some channels as differentiated by their video format, e.g. SD and HD versions.
 - **Regional content.** For public service channels that are regionalised, their content may differ in different parts of the UK. In such cases, the Freely

device will deliver the relevant regionalised version of the channel to households in the region in question. But there may also exist versions of the channel on the platform that replace regional programming with alternative content.

- The number of versions of a channel may therefore vary from device to device. When two or more versions of a channel exist, they will be regarded as ‘alternative versions of a single channel’ and treated in the following way provided the programming on the different versions is ‘sufficiently similar’ (as defined in next paragraph):
 - The alternative versions of the channel will be assigned a single LCN, with only one version of the channel made available to users.
 - The decision as to which version is listed on the EPG will be at the election of the channel provider.
 - The other versions of the channel will not normally be available to viewers.
- The ‘sufficiently similar’ criteria are as follows:
 - For **public service channels**, the broadcaster will specify which version of the channel will be regarded as the ‘default’ version in accordance with their regulatory requirements. (For channels which have different regional variants, the broadcaster will specify a default version for each region.) All of the programming on any other version of the channel must be an exact simulcast of the default version, including relevant regional programming and covering the same broadcasting hours across the day as the default version, for the alternative version to be regarded as ‘sufficiently similar’ to it. Differences in promotions, advertisements, and on-screen graphics and idents between different versions are permitted, and such differences would not preclude them from being treated as being sufficiently similar.
 - For **non-public service channels**, there may be some different programming between the versions, for them still to be treated as ‘sufficiently similar’. The versions must still recognisably be simulcasts of each other, and this must be reflected in the channel name and the vast majority of programming on the alternative versions.
- For any given public service channel, we will assign a single LCN in accordance with the prominence regime for public service channels on regulated EPGs. Any alternative versions of the channel that are not ‘sufficiently similar’ to the default version will be treated as separate channels and allocated the next LCNs in each Genre Category after the existing DTT channels and before IP-

only channels. These versions will be treated as non-public service channels for the purposes of LCN Policy rules.

- More generally, when the ‘sufficiently similar’ criteria are not met, channels will be treated as separate channels and each one will normally be assigned its own LCN.
 - We reserve the right to refuse to allocate multiple LCNs if we feel that doing so would not be an efficient use of LCNs and/or would lead to a more confusing viewer experience. In this instance, we would allocate a single LCN and the channel provider would choose which single version of the channel to offer.
 - There may be limited circumstances in which two (or more) versions of a channel are deemed ‘sufficiently similar’ but the channel provider would like each version to be allocated a separate LCN. We reserve the right to agree to such requests, by exception, where we consider that doing so would lead to a significantly better viewer experience and/or would help Everyone TV to conform to any applicable regulatory requirements.
- Regarding the last point, it became clear after we issued the consultation document that, when Freely launches, there may be some technical edge cases which will mean some viewers of some channels would benefit from having different LCNs available for the IP-delivered and DTT versions of a channel, even when those channels are deemed ‘sufficiently similar’.
- In such cases, we may in our discretion decide to allocate separate LCNs to these channels. However, this will not be standard practice, and will in any case be temporary and regularly reviewed to see if it remains necessary. The additional LCNs will be allocated at the end of the relevant content genre, in reverse order (for example in the Entertainment Genre Category, they will start at LCN 249 and work backwards). These LCN allocations will be fixed (i.e. normal rules relating inter alia to pairing, swapping, vacated channels and prominence will not apply to them) and will remain unchanged until Everyone TV considers that the dual listing is no longer necessary; except that Everyone TV may at any time choose to reorder these channels if that would better meet viewer expectations.

4.1.3. Decisions

- We will adopt our proposals regarding the Genre Categories and LCN allocations, as set out in the consultation, subject to amendments to the allocation of LCNs across the Hybrid Streamed/Text, Radio and Adult categories.

- We will move ten of the LCN slots we had allocated to Adult, and ten of the LCN slots we had allocated to Radio, over to Hybrid Streamed. We will also place Radio ahead of Adult in the order of Genre Categories.
- Following these changes, the relevant part of the new Freely EPG will therefore look like this:

LCN Range	Channel categories within this range
550-554	Hybrid Streamed & Text
555	Reserved for Accessible EPG
556-599	Hybrid Streamed & Text (continued)
600-739	Radio
740-749	Adult

4.2. Whether the Children's genre should come ahead of News or vice versa

- In the consultation document, there was one particular question for which we did not have a current preference and on which we sought opinions: should the Children's genre come ahead of News or vice versa?
- We noted that there are arguments in both directions:
 - It could be argued that Children's should come first as it keeps it closer to the Entertainment channels that children also watch, making navigation easier and helping discovery, which may in turn help to support linear Children's channels in a world that we expect will be increasingly dominated by on-demand services. It could also be argued that people who want to watch News channels would always find them even if they were further along the EPG.
 - Conversely, an argument for News to come first is that it is an important public service genre with broader appeal than Children's channels.
- On Freeview, Children's channels come ahead of News on the EPG, whereas on Freesat the News & Sports category comes before Children's.

4.2.1. Consultation responses

- Ten industry respondents and one viewer provided views on the order of the Children's and News Genre Categories.

- Six respondents – the BBC, Channel 4, TG4, UKTV, News UK and Service List Registry – argued that the News Genre Category should come first (i.e. closer to the start of the EPG). One viewer also supported this position.
 - The BBC highlighted the huge importance of news services and the significant value they deliver to audiences. They added that News content satisfies a much broader age range than children’s content and has greater reach, arguing that: *“Placing News ahead of Children’s therefore aligns with Everyone TV’s wider reach-based proposal for the organisation of services within respective genres.”* The viewer who responded similarly argued that News will be of more interest to a general audience.
 - Channel 4 stated that it *“thinks that since news is fundamental to the PSB [public service broadcasting] remit and fulfilment of a regulatory quota that it should feature above the Children’s genre”*.
 - TG4 argued that to *“allow viewers to migrate seamlessly from Freesat to [Freely], it would make sense to have the News category follow Entertainment”*.
 - UKTV said that it *“supports the ordering of the News category ahead of the Children’s category since this places compatible genres next to each other – viewers of Entertainment channels are also likely to be interested in News channels, and older viewers of Children’s content are also likely to be interested in Music channels [the Genre Category comes next in the EPG]”*.
 - News UK said: *“News should remain the first genre option, ahead of Kids, given the importance of this content to public service, media plurality and democratic objectives.”*
 - Service List Registry observed that News comes ahead of Children’s on most platforms, with Freeview being an exception.
- Four respondents – ITV, Paramount, Arqiva and a confidential industry respondent – argued that the Children’s Genre Category should come first (i.e. closer to the start of the EPG).
 - ITV said that *“it offers protection against the risk of children scrolling through potentially harmful or distressing News content, which could happen if the News genre came after the General Entertainment genre and before the Children’s genre. In addition, we feel that it makes sense for Children’s channels to follow on from General Entertainment channels, as children also watch the latter.”*

- Paramount suggested that “*this represents the most natural viewing ‘flow’ as children are far more likely to view channels within Entertainment than News. Placing News in between Entertainment and Kids inserts a barrier to navigation rather than assisting it, while also presenting a risk of harm or offence to younger viewers.*”
- Arqiva and the confidential industry respondent both took the view that the order should be the same as that on the Freeview EPG, on which Children’s channels come ahead of News. Arqiva said: “*This will allow consistency for viewers who will have devices that still use the Freeview LCN policy and those using the NGP [i.e. Freely] policy.*”

4.2.2. Consideration of responses

- A majority of the industry respondents (six of the ten) who commented on the ordering of these Genre Categories argued that News should come first on the EPG, with the other four arguing that Children’s should come first.
- The key arguments in favour of News coming first were:
 - a) Flow: there is a natural flow from Entertainment to News (both appeal to general audiences) and from Children’s to Music (both appeal to older viewers of Children’s content)
 - b) Consistency with other platforms, including Freesat
 - c) The important role it plays in delivering on public service, media plurality and democratic objectives
 - d) Its appeal to broad audiences (more so than Children’s).
- The key arguments in favour of Children’s coming first were:
 - a) Flow: there is a natural flow from Entertainment to Children’s (both appeal to Children)
 - b) Consistency with Freeview
 - c) Protection of children, who might move from Entertainment to News channels if the Genre Categories were adjacent.
- In the two lists, arguments (a) and (b) are effectively the same types of arguments played out in both directions.
 - **Flow:** we can see that valid arguments can be made in both directions. These largely cancel each other out, but the argument of a Flow from Entertainment to News and then from Children’s to Music is slightly more persuasive.
 - **Consistency with other platforms:** the persuasiveness of the “News first” argument comes from the fact that this order applies to most other

platforms. Conversely, the “Children’s first” argument can point to the fact that many audiences will migrate from Freeview to Freely or have devices with both platforms in their houses, and that Freeview is therefore the most important single platform against which to consider consistency of approach. We can see the validity of the arguments in both directions, which again mostly cancel each other out.

- Overall, our view, when looking at Flow and Consistency, is that there is little to choose between the two options (with a slight preference in favour of News coming first).
- We considered the argument about the important role news plays in delivering on public service, media plurality and democratic objectives.
 - The BBC also pointed to respondents to Ofcom’s Media Nations report, who said that *“trusted and accurate UK news was the most important element of PSB [public service broadcasting] to society, followed by ‘programmes that help me understand what is going on in the world.’”*
 - However, Children’s programming is also important in terms of public service delivery and is, of course, especially highly valued by parents.
- We note that News reaches larger audiences than Children’s. As the BBC notes, this *“aligns with Everyone TV’s wider reach-based proposal for the organisation of services within respective genres”*.
- The final argument made was one of child protection, noting the potential harm if children move from Entertainment to News channels on the EPG. While we acknowledge that there may be content in the News genre that could prove upsetting to Children, the same could be true of content in other non-Children’s genres. Broadcasters are required to be mindful of potential harm to children, for example by adhering to watershed rules. In any case, the Children’s genre will share a border with News under either option (as it does on many TV platforms, with no evidence of consumer harm).
- In summary, we found the arguments to be almost evenly-balanced, but ultimately we were slightly more persuaded by the points regarding the important role news plays in delivering on public service, media plurality and democratic objectives, plus the higher reach that News content achieves.

4.2.3. Decision

- We will place News ahead of Children’s in the order of Genre Categories. The start of the new Freely EPG will therefore look like this:

LCN Range	Channel categories within this range
1-249	Entertainment*
250-299	Time-shift (+1 channels)
300-349	News
350-399	Children's
400-449	Music

** With LCNs 31, 90-100 reserved for promotional purposes or platform information*

4.3. The proposed step-by-step rules for initially establishing the EPG listing

- As the final stage of determining the details of the LCN Policy for Freely, the consultation document set out the step-by-step rules for allocating LCNs to each channels in each Genre Category.
- This process involved covering some methodological details not addressed in earlier sections, including:
 - Details of the application of the pairing rule
 - Channels with missing or incomplete reach data
 - Genre Categories in which channels are not ordered by reach

Details of the application of the pairing rule

- The consultation document stated that, when we allocate channels to each LCN slot based on their reach for the initial EPG, we will allow each channel to bring with it a second channel from its family (the one with the next highest reach) to create a pairing.
- In the step-by-step rules, we clarified some details of the application of the pairing rule in the Genre Categories for which we order channels by reach:
 - If an LCN assignment is made to a channel for which there is no pair (because all the channel provider's channels in that Genre Category have been allocated LCNs), then no pair is made and the next LCN slot would be available for the next pairing (LCN slots would not be left vacant if a pair cannot be made).
 - In the Entertainment Genre Category, the process of allocating LCNs and offering pairing opportunities continues until LCN 31, which is

reserved for promotional purposes. The expectation is that nine pairings of channels will be allocated slots between LCN 13 and LCN 30.

However, if a channel assigned a slot in the LCN range 13-30 does not have a pair, then the channel that is assigned LCN 30 would be offered LCN 32 for a channel pair.

- Once all allocations in a Genre Category have been made, each channel provider may swap LCNs within their portfolio of channels in that Genre Category if they so choose, including channels that were allocated LCNs as pairs, in line with our rules on channel swapping (see Section 5.1).
- Equivalent rules apply in the Radio Genre Category for the allocation of commercial radio stations based on their reach (see also “Allocation of LCNs to Radio channels – proposed rules” in Section 4.1).

Channels with missing or incomplete reach data, and Genre Categories in which channels are not ordered by reach

- There are some TV channels for which reach data from BARB do not exist (and some radio stations for which reach data from RAJAR do not exist). This is the largely case for channels in the Shopping, Hybrid Streamed, Text and Adult Genre Categories. It is also the case for some channels in other TV genres.
- The consultation document explained how we will allocate LCNs to channels for which we do not have reach data or for which only partial data exists, and our approach to Genre Categories in which most channels do not have reach data.
- For those TV Genre Categories for which most channels have reach data – namely **Entertainment, News, Children’s and Music** – our proposed approach for assigning LCNs to non-BARB-rated channels on the launch EPG for Freely is to give them slots in the next available LCNs in their relevant Genre Categories, behind the channels with reach data.
 - In the absence of a numerical measure of their popularity, we proposed allocating these slots in the same order as these channels occur in the relevant section of the DTT EPG.
 - We said that we were open to considering alternative suggestions in the consultation.
- Channels in the **Time-shift** Genre Category will be allocated LCNs in the same order as their parent channels appear in the Entertainment category, once the LCN allocation in the Entertainment category for the launch EPG has been completed.
- In the **Shopping, Hybrid Streamed, Text** and **Adult** Genre Categories, we will not apply reach-based criteria at all, given how few channels in each category have their reach measured by BARB. Otherwise, those channels which are

measured by BARB would have an unfair advantage over other providers in the same category, who might feel they need to bear the cost of joining BARB to improve their EPG position even if the reach data were otherwise of no value to them. Channels in these Genre Categories will be allocated LCNs in the same order as they occur in the relevant section of the DTT LCN listing.

- For the **Faith & International** Genre Category, we said that we will be guided by consultation responses on whether to put channels with reach data at the start of their section.
- We also set out proposed rules for channels that have launched recently, and for which a full year of reach data is not available for the period used to establish the order of channels:
 - If less than one quarter’s worth of data is available during the year being used to assess reach, we proposed treating these channels in the same way as those for which no reach data at all is available.
 - Provided at least one quarter of data is available, we proposed that reach for the new channel will be calculated using the available data for the relevant year being assessed.
 - Recognising that this might give the new channel an unfair advantage relative to existing channels in proximity, we reserved the right to adjust the new channel’s position when ordering channels.
 - Again, we said that we were open to considering alternative suggestions in the consultation, given the proposed approach could prove laborious to implement.
- We proposed that when ordering commercial radio stations in the **Radio** Genre Category, we adopt equivalent rules to those for the TV Genre Categories for which most channels have reach data:
 - Radio stations with no reach data from RAJAR will be allocated LCNs after those stations that do have such data (but ahead of the full list of BBC local radio stations), in the order in which they appear on the DTT EPG.
 - For commercial stations with partial reach data from RAJAR, if a quarter or more of reach data is available, that will be used to rank the station’s popularity. As with TV channels we reserve the right to adjust the new station’s position in the ranking to avoid giving it an unfair advantage.

4.3.1. Consultation responses

- Four industry respondents supported the overall proposals: the BBC, ITV, Channel 4 and Paramount.

- In addition:
 - A confidential industry response agreed that the *“LCNs assigned to each category seems logical”*.
 - TG4 stated that: *“We have no issues in principle with the step-by-step rules you propose.”*
- Two comments were made regarding the proposals relating to channels with missing reach data:
 - News UK argued that: *“Channels which do not have the objective data for ranking should be allocated LCNs alphanumerically behind all channels (irrespective of genre classification) that do have such data”*.
 - The BBC said: *“we consider that a ‘neutral’ chronological-based approach, related to the channel’s historical launch to consumers on any TV platform, might be appropriate in the interim (i.e those non-BARB measured channels would be listed in order of date of initial consumer launch on any platform) at least until such time that a periodic review takes place.”*
- TG4 noted that ROI services are not measured by BARB and argued that our approach *“to have LCNs allocated to RTE services solely on the basis of Reach would not be acceptable”*.
- For the Faith & International Genre Category, we invited views on whether to put channels with reach data at the start of their section. No comments were made on this.
- We also said that we were open to considering alternative suggestions in the consultation to our proposed rules for channels that have launched recently and for which a full year of reach data is not available. No comments were made on this.

4.3.2. Consideration of responses

- All four of the industry respondents who commented on the overall proposals were supportive, while two others supported elements of the proposals.
- Regarding our proposed approach for ordering non-BARB-rated channels in those TV Genre Categories for which most channels have reach data, two respondents offered alternatives to our proposals:
 - Our approach was to give non-BARB-rated channels slots in the next available LCNs in their relevant Genre Categories behind the channels with reach data, in the same order as these channels occur in the relevant section of the DTT EPG.

- We are not persuaded by News UK’s suggestion to rank these channels alphanumerically. Such an approach does not feature elsewhere in other LCN Policies. And it risks creating the same kind of perverse incentives that used to be a feature of classified listings such as the Yellow Pages, in which companies would rename themselves “A1 Taxis” etc, to move up the listings.
- The BBC’s suggestion, to base the list on the date when the channel first launched, would involve developing a set of rules to cover circumstances such as how to treat channels that change their name; or which launch, close down and then relaunch. Such an approach could be more complicated to implement than our proposal.
- In summary, we do not believe that the alternative suggestions that were made are preferable to our original proposals, which are in line with our objectives for the Freely LCN Policy.
- We discussed the status of the publicly-funded Irish channels from TG4 and RTE in Sections 3.3 and 3.4 above. These channels are not designated as public service channels in the UK. As their reach is not measured by BARB, these channels will be treated in the same way as other channels for which no BARB data exists.
- For the Faith & International Genre Category, we received no comments on whether to put channels with reach data at the start of their section. We have decided to treat this Genre Category in the same way as the Shopping, Hybrid Streamed, Text and Adult Genre Categories: Faith & International channels will be allocated LCNs in the same order as they occur in the DTT EPG.
- We received no alternative suggestions to our proposed rules for channels that have launched recently and for which a full year of reach data is not available. We will therefore adopt the original proposals.
- As part of the step-by-step rules in the Entertainment Genre Category, we explained in the consultation document how the pairing rule would work around LCN 31, which is reserved for promotional purposes. An equivalent approach will be adopted for pairing rules that cut across LCNs 90-99, which are likewise reserved for promotional purposes (we did not refer to this specifically in the consultation document). The pairing will proceed in the usual way up to LCN 89 and then continues again from LCN 101, subject to the following rules:
 - If a channel pairing is made in LCNs 88-89, the process continues as normal from LCN 101.
 - If a channel is assigned LCN 89 and then offered a further LCN to make a pair, then the paired channel will be assigned LCN 101.

While we did not set this out in the consultation document, this approach is in line with the equivalent rules in the consultation document on how the pairing rule works around LCN 31.

4.3.3. Decisions

- We will adopt our proposals regarding the step-by-step rules for initially establishing the EPG listing, as set out in the consultation.
- Regarding the rules on which we invited comments:
 - We will adopt our proposed approach to give non-BARB-rated channels slots in the next available LCNs in their relevant Genre Categories behind the channels with reach data, in the same order as these channels occur in the relevant section of the DTT EPG.
 - The Faith & International Genre Category will be treated in the same way as the Shopping, Hybrid Streamed, Text and Adult Genre Categories: channels will be allocated LCNs in the same order as they occur in the DTT EPG.
 - We will adopt our proposed rules for channels that have launched recently and for which a full year of reach data is not available.

5. Rules for the ongoing management of the EPG post-launch

5.1. New channels, vacant slots and channel swapping

- The consultation document proposed rules for a number of post-launch events that would require adjustments to the LCN allocations on the EPG: new public service channels, new non-public service channel launches, channel exits that leave LCN slots vacant, and changes by channel providers to their line-ups (channel swapping).
- Any **new public service channel** (see section 3.3 for definition) would at the very least be assigned an LCN in accordance with the prominence regime for public service channels on regulated EPGs.
 - Broadly speaking, the proposed rules state that the new channel would be assigned the lowest vacant LCN within the relevant Genre Category (i.e. the one closest to the start of the LCN list).
 - If we believe that there is a better way to deliver a more prominent LCN slot for the new channel, or if there is no suitable vacant slot available that meets the minimum prominence obligations specified in the prominence regime for regulated EPGs, or if no prominence obligations are specified by Ofcom in the prominence regime for regulated EPGs, then we would issue a consultation on the options under consideration and decide which method to adopt in the light of the responses received.
 - For the avoidance of doubt, the same rules would apply to an existing channel that is newly designated as a public service channel.
- When a **new non-public service channel launches on the platform**, it would normally be assigned the next available LCN at the end of the relevant Genre Category. There are certain circumstances in which the new channel might be offered a lower LCN, either as part of the ‘vacated LCN’ process described in the next paragraph or if, after a ‘shuffle-down’ procedure has concluded (as described below) and any slot has still not been filled, the vacant slot will be allocated to the next channel that launches on the platform.
- We will treat any new channel that meets the criteria of being an alternative version of an existing channel as per the rules discussed in Section 4.1.2 under the heading ‘**LCN allocations when there are alternative versions of a single channel**’.

- If a **channel exits the platform and leaves a vacated LCN**, we proposed adopting a similar policy to that currently used in the DTT listing policy to fill the vacated slot. The approach may be summarised as follows:
 - First, we would offer the vacant slot to any public service channels in the relevant Genre Category in higher (i.e. less prominent) LCN positions, starting with the closest public service channel.
 - Next, we would offer the vacant slot to nearby non-public service channels if they are able to make a pairing, or semi-adjacent pairing, by moving another channel in their family that currently occupies a higher LCN slot in the Genre Category. We would first invite the channel that appears one LCN lower than the vacant slot to form a pair; and then, if necessary, extend the offer one by one to the channels in the five positions higher and lower than the vacated LCN.
 - If the slot has still not been filled, then it would be offered to the next channel that launches onto the platform which belongs to the same channel family as any existing channel in the relevant genre.
- At any point in time, if the procedure outlined above does not fill the vacant LCN, Everyone TV may initiate a ‘shuffle-down’ procedure:
 - Channels with higher LCNs (starting with the channel in the next-highest LCN slot) would be invited to fill the vacant slot.
 - When a channel accepts a move, their newly vacated slot would then be offered to the channel with the next-highest LCN, and so on.
 - Once the procedure has concluded, a series of channels would all move simultaneously by one or more LCNs to more prominent slots.
- Finally, **we proposed to permit channel providers to swap LCN slots for channels within their family of channels**, so long as the swaps take place within the same Genre Category.
 - Within a channel family, public service channels would be able to swap with other public service channels, and non-public service channels would be able to swap with other non-public service channels. But a public service channel could not swap with a non-public service channel.
 - If a channel provider changes the content and/or name of a channel in its line-up, we proposed that it would be allowed to retain that channel’s LCN so long it remains appropriate to its Genre Category.

5.1.1. Consultation responses

- Regarding the overall proposals relating to post-launch events:

- Six industry respondents expressed full support: the BBC, ITV, Channel 4, Paramount, RTE and Arqiva.
- In addition, a confidential response from a broadcaster was in general agreement, but argued that vacant slots: *“should not be offered to PSB [public service] channels initially, they should be treated in the same way as non PSB channels. Designated PSB channels would already have their own rules for assigning LCN positions.”*
- Another confidential industry respondent stated that they agree with the proposals so long as: *“these rules do not undermine the reach methodology, which should prevail”*.
- One viewer stated that they “mostly” supported the proposals.
- We received a number of further responses to the specific events covered in this section, which we will summarise in turn.
- Five industry respondents commented on the proposed rules for **new channel launches (public service and non-public service channels)**:
 - The BBC supported the approach to new public service channels, subject to the rules of any prominence regime that Ofcom itself might determine for any new (or newly-designated) public service channel. It added that consulting on options at the time affords the most flexibility to Everyone TV and its stakeholders at the time of any such new channel launching.
 - TG4 largely agreed with the proposals but wished to see disruption to existing LCN allocations being kept to a minimum. It argued that if, for example, there was no available slot for a new public service channel and all non-public service channels within a genre were moved down the order to create a slot, the EPG should then be “fixed” for a period of 12 months.
 - News UK agreed that non-public service channels should be allocated LCNs at the bottom of the list (and then reallocated LCNs based on popularity at the next review), but also argued that this should be the only criterion used to set LCNs – so, for example, a new channel should not be able to swap with another channel from the same family (see comments on ‘changes by channel providers to their line-ups and channel swapping’ below).
 - UKTV argued that it and other broadcasters who wish to launch new IP-delivered channels should not be disadvantaged in the placement of its channels in the launch order compared to the Everyone TV shareholder broadcasters.

- A confidential industry response suggested retaining a block of channel numbers at the end of each genre and making these invisible to the viewer to allow for further launches.
- Five industry respondents commented on the proposed rules for **vacated LCNs**:
 - TG4 and the BBC were in support of the proposals, the latter noting that they largely mirror the rules on Freeview, which appear to have worked well.
 - The other three responses did not agree with the proposals:
 - UKTV supported the first stage, to offer vacant slot to public service channels, but argued that the rules in the subsequent stages are arbitrary and can lead to unfair outcomes. It suggested offering the slot to the channel with the highest reach that has a higher LCN, leaving it vacant or shifting all channels down to fill the gap.
 - News UK argued that vacant slots should be made available on the open market.
 - And Service List Registry argued that the reshuffling of channels should be avoided and suggested either replacing the vacating channel with a similar service or just leaving it empty.
- Five industry respondents commented on the proposed rules for **changes by channel providers to their line-ups and channel swapping**:
 - A confidential respondent supported the proposals. It also sought to clarify that if a broadcaster were to swap its channels, and a review of the platform then leads to a reordering of its channels, whether the broadcaster can swap its channels again.
 - TG4 also supported the proposals, but added the suggestion that any changes made must remain fixed for a period of time to minimise disruption to LCN allocations.
 - News UK argued against “swapability rules”, on the grounds that it would have a negative impact on competitive dynamics and lock in incumbents’ advantage.
 - One Box and The Dales Company also objected to the proposals, claimed that they would lead to a poor viewer experience and consumer frustration, and that changing channel numbers would reduce the commitment from channel operators to market LCNs.

5.1.2. Consideration of responses

Overarching observations

- In addition to the six industry respondents that supported the proposals in full, a further two partly supported them, subject to specific points:
- A confidential response from a broadcaster argued that existing public service channels should be treated in the same way as non-public service channels when filling vacant slots, and should not be given preferential treatment by giving them the benefit of being able to leap into vacated LCNs. However, one of the stated objectives of the Freely LCN Policy is to “ensure the ongoing prominence of public service channels”, and we remain of the view that we should take the opportunity that vacated LCNs give us to improve the prominence of a public service channel in a less prominent LCN.
- Another confidential respondent agreed with the proposals so long as the rules didn’t undermine the reach methodology. Our approach is to allocate LCNs first on the basis of reach in the EPG at launch, as discussed in previous sections, and then subsequently apply the rules proposed in this section for the ongoing management of the EPG post-launch. So these post-launch rules do not affect the initial approach of ordering channels by reach (which the respondent supported).

New channel launches (public service and non-public service channels)

- A majority (six of the ten respondents who expressed a view) fully supported our proposals and one more (TG4) was partly in support.
- Regarding TG4’s point about minimising disruption and not reallocating LCNs too frequently if channels are shunted to make way for new public service channels, we note that in practice the designation of new public service channels is a rare event and should not lead to frequent LCN reallocations.
- Only one respondent fundamentally disagreed with the proposals: News UK argued for an approach in which channel rankings are entirely determined by reach, so new non-public service channels should always go to the end of the EPG without any possibility to move them into more prominent LCNs until the next periodic review (see Section 5.6). This means, for example, that under their proposed approach a new channel would not be able to swap with another channel from the same family (see comments on ‘changes by channel providers to their line-ups and channel swapping’ below). As we stated in the consultation document, the proposed Freely LCN Policy was designed to meet a range of objectives and to be guided by what audiences want. The objectives include giving channel providers the opportunity to reach viewers, which involves finding the right trade-off between new and incumbent players. Audiences told

us that there are benefits of channel groupings, and our proposals reflected this by allowing a defined set of circumstances in which channels from the same family can be grouped together on the EPG. We remain of the view that our approach strikes the right balance.

- Two other respondents made comments:
 - To UKTV’s point, we can confirm that no channel providers will be disadvantaged in the placement of its channels in the launch order compared to the Everyone TV shareholder broadcasters. The rules will apply equally to all channel providers, regardless of their ownership.
 - Regarding the suggestion that we should retain a block of channel numbers at the end of each genre for further launches, we can confirm that there will be space at the end of each Genre Category for new channels to launch into.

Vacated LCNs

- A majority (seven of the ten respondents who expressed a view) supported our proposals.
- Alternative options for filling vacated slots were raised by three respondents:
 - UKTV suggested offering the slot to the channel with the highest reach that has a higher LCN, or shifting all channels down to fill the gap.
 - Service List Registry’s suggested offering the slot to a “similar service”.
 - News UK suggested making vacant slots available on the open market.
- We remain of the view that our original proposals are appropriate in the light of our objectives for the Freely LCN Policy. They are based on those in the DTT LCN Policy, which have worked well and in particular have enabled many channel providers to benefit over the years by moving into more prominent positions.

Changes by channel providers to their line-ups and channel swapping

- A majority (seven of the 11 respondents who expressed a view) fully supported our proposals and one more (TG4) was partly in support.
- We note TG4’s suggestion that any changes made should remain fixed for a period of time to minimise disruption to LCN allocations. Our proposed approach is similar to that used in the DTT LCN Policy, which has worked well. We do wish to minimise disruption to viewers, and we will continue to encourage channel providers to co-time their changes with those of other providers, which might also allow for more effective public communication of changes. In addition, so that we can manage the technical and operational processes involved and minimise disruption to viewers, the timing of any

reordering or renaming of channels must be expressly agreed with Everyone TV.

- The other three respondents disagreed with the proposals:
 - Regarding News UK’s argument that these rules protect incumbents at the expense of overall competition, we do not believe that this will be the outcome. All channel providers, irrespective of when they join the platform, will be able to benefit from the flexibility provided by the proposed rules to change their line-ups or swap LCNs. For example, a channel provider could launch a new channel on the platform and then at a later stage rename it or replace the original channel with another one, or launch a seasonal pop-up channel, on the existing LCN – to the benefit of the channel provider and viewers alike.
 - We disagree with the claims by One Box and The Dales Company that the proposals would lead to a poor viewer experience and consumer frustration. Channel swapping has been permitted in the DTT LCN Policy for several years, and we have seen no evidence of this.
- Regarding the clarification sought by a confidential industry respondent, we confirm that if a broadcaster swaps its channels, and a review of the platform then leads to a reordering of its channels, the broadcaster will then have an opportunity to swap its channels again after the reordering.

5.1.3. Decisions

- We will adopt in full the proposed rules in the consultation document for post-launch events covering:
 - new public service channels,
 - new non-public service channel launches,
 - channel exits that leave LCN slots vacant, and
 - changes by channel providers to their line-ups and channel swapping.

5.2. The addition of DSat-only channels to the EPG

- At launch, Freely will offer a combination of DTT and IP-delivered channels, with the ability to make a DSat connection potentially added at some point after launch. In the consultation document, we put forward our view that the established EPG line-up should not be disrupted when DSat-only channels join the platform, and that all prior LCN assignments for DTT and IP-delivered channels should remain unchanged.

- We proposed assigning LCNs to DSat-only or new DSat channels at the back of the EPG in the relevant Genre Categories, in order of their popularity as determined by reach (we would consider at the relevant time whether to use channel reach on the DSat platform or an alternative measure to rank channels). Channels for which no reach data exists would be then assigned the next available LCNs at the back of the EPG.
- When the next periodic review of the LCN Policy takes place after the addition of DSat channels (see Section 5.6 below), all channels would be considered on an equal basis in a technology-neutral manner as the new allocation of LCNs is made. So DSat-only channels would have an opportunity at that time to move to more prominent slots in the EPG.

5.2.1. Consultation responses

- Ten of the industry respondents expressed a view (there were no viewer responses). A majority (seven of the ten) supported the proposals in the consultation: the BBC, ITV, Channel 4, Paramount, TG4, RTE and a confidential industry respondent.
- The other three respondents (UKTV, Service List Registry and a confidential response from a manufacturer) argued that LCNs should be reserved for satellite channels at launch.
 - UKTV argued that DTT and DSat channels should be prioritised in the Entertainment section from the outset ahead of all IP-only channels.
 - Service List Registry argued that this would be consistent with the platform’s technology-neutral approach.
 - The confidential response from a manufacturer argued that adding DSat channels at a later point would mean that they are not properly integrated, and that part of the value of DSat-delivered channels is that they permit the delivery of any regional service to any region of the UK.
- The BBC made the observation that there may in practice be few DSat-only channels when it comes on stream, as those channels could have the option to launch via IP first.

5.2.2. Consideration of responses

- A clear majority of responses supported our proposals, and we also note the point that DSat-only channels have the opportunity to join the platform as IP-delivered channels when Freely launches or at any time afterwards.
- In response to the point made by a manufacturer, our proposals include an allocation of a range of LCNs for regional variants of TV channels, which are

intended to replicate the benefit that Freesat viewers have to access regional services from other regions of the UK.

- In terms of the platform’s technology-neutral principle, our approach is to follow this as much as is reasonably practicable, but that does not imply that technology neutrality automatically takes precedence over all other considerations. In terms of the points raised in relation to DSat-only channels:
 - Our aim to ensure technology-neutrality will be reflected in the first periodic reordering that follows the launch of DSat channels on the platform, in which all channels – whether DTT, DSat or Freely-approved IP channels – will for the first time be assessed and allocated LCNs on an equal basis using popularity according to the same criteria.
 - Prioritising DTT and DSat channels ahead of IP-only channels (as UKTV proposes) would in our view not be in keeping with our technology-neutral approach, when DTT and IP channels will be available at launch, would discriminate against IP channels and undermine the one of the purposes of the new platform, which is to provide a single consistent experience for live free TV over IP.
 - Conversely, our view remains that there would be a substantial practical downside to assigning slots at launch to DSat-only channels that may become available on the platform at some point in the future – if they have not already launched as IP-delivered channels in the interim. It would be inefficient and wasteful, leaving unnecessary gaps in the launch EPG.
- We remain of the view that our proposals are in line with our objectives for the Freely LCN Policy.

5.2.3. Decision

- We will adopt in full our proposals regarding the addition of DSat-only channels to the EPG, as set out in the consultation.

5.3. Minimum broadcast hours

- To be granted access to the new platform and allocated an LCN in the main TV Genre Categories (i.e. not Hybrid Streamed, Adult, Text or Radio channels), we proposed the rule that any new channel must deliver a **minimum of eight hours** of audio-visual content each day or 56 hours across each week (an increase from six hours per day in the current DTT LCN Policy, Clause 2.3). A static slate does not count as audio-visual content for the purpose of this rule.

- Given that some existing DTT channels do not currently meet the eight-hour requirement, we proposed the following rule so no existing DTT channels are excluded from the listing on the basis of their broadcast hours:
 - *“Channels which were broadcasting on the DTT platform before 1 March 2021 must broadcast a minimum of two hours per day or 14 hours per week of audio-visual content via DTT. Channels which were broadcasting on the DTT platform for less than two hours per day or 14 hours per week prior to 3 April 2017 must broadcast at least two hours per day or 14 hours per week of audio-visual content via DTT upon the expiry of their current carriage agreement with a multiplex operator.”*

5.3.1. Consultation responses

- 12 of the industry respondents expressed a view. Of these, five fully supported the proposals: the BBC, ITV, Channel 4, Paramount and RTE. One Box and The Dales Company argued that the existence of channels with limited hours is a result of bandwidth scarcity, and that such channels should be mandated to operate a minimum content wheel and fill their schedule on the platform.
- Of the other respondents, two – Arqiva and Service List Registry – agreed that there should be minimum broadcast hours, but that the threshold should remain at six hours. Arqiva argued that the rules should align with the DTT LCN Policy, while Service List Registry made the point that an increase from six to eight hours per day effectively reduces the number of day parts from four to three, which may be undesirable for channel providers.
- A confidential industry respondent argued that the proposed threshold is too high, without providing further details.
- Another confidential industry respondent supported the proposals in the short-term, but added that there would be shortcomings in the longer term as the IP service market grows, e.g. weekend pop-up channels built on sports events.
- One viewer made a similar point, arguing that this rule would make it harder for channels to launch ‘pop-up’ channels on their own LCNs to cover sporting or other events, as the BBC for example might do for its Wimbledon or Glastonbury coverage.
- The final respondent, News UK, was alone in arguing that there should be no minimum broadcast hours rules at all, and that it should be for the channel providers to determine.

5.3.2. Consideration of responses

- There was a majority in favour of our proposals (seven of the 12 industry proposals), with most of the other responses agreeing with the principle of minimum broadcast hours but arguing that eight hours is too many.
- We are persuaded by the argument that six hours is a more suitable minimum requirement than eight, in particular because it would mean that a new channel launching on DTT for six hours per day (to serve Freeview audiences) could also be available to Freely audiences.
- On the particular issue of pop-up channels, any broadcaster will be free to launch pop-up channels to cover specific events, which would be allocated their own LCNs. Any such channels would need to comply with the minimum broadcast rules, but we do not believe this would prevent broadcasters from launching dedicated pop-up channels.

5.3.3. Decision

- We will adopt our proposals regarding minimum broadcast hours, as set out in the consultation, with one change. The threshold will be set at six hours.

5.4. LCN sharing for sub-UK channels

- When channels broadcast to distinct areas of the UK, there is potential for more than one channel to share an LCN, representing an efficient use of the slot. We proposed carrying over essentially the same rules that currently apply in the DTT LCN Policy, which specify the circumstances in which this is permitted (covered in Clauses 5.10-5.12 of the DTT LCN Policy).
- They state, broadly speaking, that where channels broadcast to distinct areas of the UK, and their coverage does not overlap, those channels may share an LCN in a Genre Category if either of two conditions are met:
 - All of the channels under consideration are public service channels, or
 - For non-public service channels, all of the channels under consideration are part of the same channel family.

5.4.1. Consultation responses

- Seven of the industry respondents expressed a view (there were no viewer responses). Six of the respondents fully supported the proposals: the BBC, ITV, Channel 4, Paramount, RTE and Service List Registry.
- One confidential industry response disagreed with the proposals: it objected to the allocation of a single LCN (8) to all of the local TV services in England. It

argued that an important reason why local TV services in certain areas use different LCNs on Freeview is to avoid overlap with neighbouring local or national public service channels, and that the proposal for Freely risks damaging these providers.

5.4.2. Consideration of responses

- A large majority of respondents (six of the seven who expressed a view) supported our proposals.
- With regards the proposed allocation of LCN 8 to all local TV services in England, we consider it appropriate to reserve a single LCN in each nation for local TV services. This follows the practice adopted on most other platforms⁷. It enables the Freely platform to give appropriate prominence to these services, while ensuring efficient LCN management.

5.4.3. Decision

- We will adopt in full our proposals regarding LCN sharing for sub-UK channels, as set out in the consultation.

5.5. Whether LCN trading should be permitted or prohibited

- In the consultation document, we noted that LCN trading was permitted on Freeview following a consultation in 2020/21. Two processes were introduced:
 - Two existing channels within a particular genre, each under different ownership, were permitted to swap LCNs with each other.
 - An existing channel on the platform could sell the right to occupy its LCN to a new channel (under different ownership) launching into the same genre.
- A number of LCN trades between channel providers have taken place on Freeview, and we believe that the new rule has worked well on the platform.
- We said that we could see merit in permitting LCN trading in a similar way on the Freely EPG – although the potential benefits would be time-limited, as the next periodic review of LCN Policy (see Section 5.6 below) would update the reach-based popularity ranking of the channels and reassign LCNs.

⁷ In the DTT listing, some local TV services in England appear on LCN 7 and others appear on LCN 8. However, LCN 8 was the LCN initially allocated to all of these services. When LCN 7 became vacant, some services elected to change their allocation to LCN 7.

- Conversely, we also recognised that allowing LCN trading would impact the reach-based ordering of channels that underpins LCN allocations, and that this could be a potential reason not to permit it on the new platform.
- With valid arguments in both directions, we said that we were open to views on whether and when LCN trading should be permitted on the new platform.

5.5.1. Consultation responses

- 14 of the industry respondents expressed a view, and overall opinions were varied (there were no viewer responses). A small majority (eight of the 14) were in favour of permitting trading: Channel 4, Paramount, UKTV, TG4, RTE, Service List Registry, Arqiva and a confidential industry respondent.
 - Channel 4 said: “noting that the trading that has occurred on the DTT platform in recent years has worked well and not resulted in any outcomes that appear to be negative for viewers, C4 sees no reason to prohibit trading in the future”.
 - UKTV said: “We agree that the current policy in respect of LCN trading between broadcasters in the Freeview DTT LCN Policy (updated in October 2021) works well and believe that the same policy should be adopted for any NGP [i.e. Freely] EPG”.
- Of the other responses, two – the BBC and ITV – argued for a moratorium on trading, to allow time for the new LCN Policy to bed in. ITV said that LCN trading was introduced on the Sky and DTT platforms for efficiency reasons specific to those platforms, i.e. to deal with LCN logjams. Their suggestion was to keep LCN trading as an option for consideration in the first periodic review:
 - “ITV’s position is that it feels sensible to prohibit it at launch. We would like to see how the new EPG functions before it is decided whether to introduce trading or not.”
- The other four responses argued that trading should never be permitted. One confidential industry respondent argued that reach should always prevail, while One Box and The Dales Company argued that it could lead to LCN squatting with occupants looking for the highest bidder. News UK argued that LCN trading in the way we describe it should not be permitted, but that vacated LCNs should be made available on the open market.

5.5.2. Consideration of responses

- The range of views expressed reflects the trade-offs inherent in this issue that we highlighted in the consultation document.

- On the one hand, trading has worked well for the DTT LCN Policy and the channel providers that have participated in trades have welcomed what was for them a win-win outcome.
- On the other hand, this is a new platform, with a greater emphasis on reach as an ordering mechanism.
- We were less convinced by the argument made by One Box and The Dales Company, as our rules on minimum hours should mitigate any risk of squatting.
- With valid arguments in both directions, in this instance we felt that our objectives for the Freely LCN Policy are best met by adopting a position between the two extremes of allowing trading from launch to prohibiting it completely. Our view is that there should be a moratorium on trading when the platform launches, to give the new EPG some time to bed in, and that trading will then be permitted from 12 months after the launch date of the new platform. Having consulted on the issue here, we will not need to consult again on this ahead of the introduction of trading.

5.5.3. Decision

- There will be a moratorium on trading when the platform launches. Trading will then be permitted 12 months after the launch date of the new platform, without the need for further consultation.

5.6. Our indicative timetable for periodic future reviews of the LCN Policy

- We proposed in the consultation document that we would conduct periodic reviews of the LCN Policy. Our proposals broke down into two elements:
 - First, we proposed that we would periodically reorder the LCN listing, based on an updated assessment of channels' popularity.

When the time came to reorder channels, we also said that we would consider whether there may be other methods to meet audience expectations about putting the most popular channels into prominent positions, and if so we would consider using such methods. For example, it may be possible to make use of data generated from the platform itself once it is up and running.

- Second, we proposed that, at the same time as the reorderings, we would review the LCN Policy more broadly and evaluate its overall performance, and consider making changes to it if appropriate (such changes would be subject to a consultation process).

- In terms of timings, we proposed that the periodic reorderings and reviews would take place every **three to five years**, and that we would provide channel providers with at least one year’s notice.
- If at any point in time we were to find that demand for LCNs was outstripping supply in any Genre Category, then we would undertake a review of the LCN allocations with a view to expanding the allocation to the relevant Genre Category. Any such review would aim to make as few changes as needed to the LCN listing.

5.6.1. Consultation responses

- 15 of the industry respondents expressed a view (there were no viewer responses). Almost half of these (seven of the 15) fully supported the proposals: the BBC, ITV, Channel 4, Paramount, RTE, TG4 and a confidential industry respondent.
- Of the other responses, most related to the timings of the reorderings and reviews:
 - Arqiva largely supported the proposals but recommended the period should be fixed at four years (i.e. the middle of our proposed range).
 - A confidential response from a broadcaster agreed that it was sensible for reviews to be no sooner than three years, but expressed concerns about how new channels of existing broadcasters would be treated, arguing that three years would be a challenging timeframe to create a commercially viable channel if there were no other opportunity to improve its LCN.
 - Three respondents argued that they should be more frequent, with News UK, Service List Registry and a confidential industry respondent calling for annual reorderings/reviews. Conversely, UKTV suggested they should only take place when a lot of channels need re-ordering, and then only in the relevant Genre Categories.
- Beyond the timings, a few additional points were made:
 - Arqiva suggested that broadcasters should be permitted to reject a move to a more prominent position after a reordering if they preferred to keep their less prominent LCNs.
 - A confidential industry respondent argued that reorderings create greater uncertainty for smaller channels, which are more likely to have to move.
 - UKTV argued that all channel providers should be notified of an upcoming reordering or review (as well as the criteria to be used to

determine channel orderings) at the same time in order to ensure a level playing field. They suggest that such notification should be made before the start of the relevant review period (e.g. if ETV proposes to re-order channels based on their reach during 2028, broadcasters should be notified of this before the start of 2028).

- Roku suggested that all the proposals should be subject to review as audience behaviour develops to promote consumer benefits, overall engagement – particularly in public service services – and ensure that the UK maintains a leadership position in platform innovation.

5.6.2. Consideration of responses

- Of the responses that supported the proposals and/or commented on the timing of the reorderings and reviews, a majority supported our proposals that a three-to-five-year period provides the best balance. The proposed position provides a degree of flexibility instead of committing to a fixed time period. No arguments were provided that convinced us that we should forego the flexibility and fix a specific point within the proposed three-to-five-year range.
- Regarding UKTV's argument that all stakeholders should be given advance notice of any reordering or review at the same time, we confirm that all channel providers will be given at least one year's notice.
- Of the other suggestions, some respondents argued for more frequent reorderings/reviews, others for less frequent. There were few arguments in either direction, and we were not persuaded that our proposed range should change. However, while maintaining the proposed range, we do believe it would be prudent to reserve the right to undertake a review of the Policy at an earlier date if we believe there are compelling platform or viewer justifications.
- We disagree with Arqiva's suggestion that broadcasters should be permitted to reject a move in a reordering. We will take the views of channel providers into account but final decisions rest with Everyone TV. Moreover, Arqiva's proposal could have knock-on effects that we feel would unduly complicate the process.
 - For example, say the outcome of the reordering process meant that Channel A was entitled to move from LCN 89 to LCN 50, while Channel B was entitled to move from LCN 96 to LCN 89. If Channel A rejected the move to the more prominent slot it was offered, then LCN 89 would no longer be available for Channel B to move into. In effect, therefore, once the reordering process had ascertained which LCN each channel was entitled to move into, we would need to check with every individual channel which was entitled to a promotion – and if any rejected the promotion, we would have to recalculate the LCNs that every other channel could move into. That recalculation in itself might change some

channels' opinions on whether they wish to accept a promotion, and the process could potentially have to be repeated multiple times.

- We note the argument from a confidential respondent about the uncertainty for smaller channels, but part of this uncertainty is the possibility for successful channels of any size to be rewarded with a move up the EPG, and we regard this as a positive feature of our proposed rules.
- In response to Roku's point, our proposals envisage us considering as part of each reordering process whether reach or some other approach may be the best way to meet audience expectations about ordering channels. We believe that this process should ensure that the platform promotes consumer benefits and engagement, and helps the UK maintain a leadership position in platform innovation.
- Overall, we believe that our proposals are in line with our objectives for the Freely LCN Policy, with the clarification that it would be prudent to reserve the right to undertake a review of the Policy at an earlier date if we believe there are compelling platform or viewer justifications.

5.6.3. Decision

- We will adopt in full our proposals regarding periodic LCN reorderings and LCN Policy reviews.
- Every three to five years, we will reorder the LCN listings (having first given all channel providers one year's notice of our intention to do so). This reordering will follow the same principles as the initial Freely LCN allocation process: it will assign LCNs to public service channels as appropriate, and allocate LCNs to other channels based on their popularity, and use 'pairing' rules. We will also consider at the time whether there may be other methods than those used to establish the initial listing to better meet audience expectations of listing channels by popularity.
- At the same time as the reordering, we may also review the LCN Policy more broadly against the objectives for the Freely LCN Policy (as set out in Section 2.1) and consider whether to consult on making changes to it.
- If at any point in time we find that demand for LCNs is outstripping supply in any Genre Category, then we would undertake a review of the LCN allocations with a view to expanding the allocation to the relevant Genre Category. Any such review would aim to make as few changes as needed to the LCN listing.
- We reserve the right to undertake a review of the LCN Policy at any time, if we believe there are compelling platform or viewer reasons to do so.