

Consultation on revisions to the use of Promotional LCNs
13th February 2026



Consultation on Revisions to the Use of Promotional LCNs 31 and 90-99

Published: 13th February 2026

Responses by: 13th March 2026 at 17:00

Executive Summary

This consultation sets out proposed revisions to the Freely LCN Policy¹, specifically the rules governing how Everyone TV uses the Logical Channel Numbers (LCNs) 31 and 90-99, which are currently reserved for promotional purposes on the Freely platform.

Under our current arrangements, Everyone TV's Device and Operating System (OS) partners may allocate LCNs 1001+ to channels which they make available to end users. This number range is not part of the Freely electronic programme guide (EPG). Channels within that range are made available pursuant to arrangements between Device/OS partners and the channel providers, not with ETV.

We propose to make available LCNs 31 and 90-99 for the listing of Device and OS partner channels within the Freely EPG.

We would agree, in partnership with Device and OS partners, which channels are appropriate for listing in the LCNs 31 and 90-99, and allow Device and OS partners to determine the initial ordering of the agreed channels within that range. Channels agreed for listing within that range would need to comply with the Freely Scope of Access requirements and other Freely requirements on the same basis as other Freely channels.

We invite stakeholders' views on the proposal.

1. Introduction

1.1 About Everyone TV

Everyone TV is responsible for the day-to-day running of the UK's main free TV platforms and for leading free TV's evolution for the streaming age. Freely brings live and on-demand content together in a single experience on supported TVs.

1.2 Scope and exclusions

The proposals in this document concern only the use of LCNs 31 and 90-99 on Freely, which are currently reserved for promotional use. The proposals do not amend the allocation principles for other LCN ranges on Freely, nor do they change LCN policies on Freeview, Freeview Play or Freesat.

¹ <http://everyonetv.co.uk/freelylcnpolicy>

2. Reasons for the proposed change

Everyone TV's partnerships with Device and OS partners are key to ensuring that Freely is easily and widely available to UK viewers. Therefore, it is important that these partnerships deliver the best value for all participants in Freely: channel providers, device and OS partners, and viewers.

With that in mind, this consultation aims to:

- **Improve discoverability** of relevant Device and OS partner channels in a manner consistent with the viewer experience on Freely.
- Operate a **fair, reasonable and non-discriminatory** (FRND) approach to allocation within the LCNs 31 and 90-99.
- Provide **greater operational flexibility** to Device and OS partners within clear parameters.

3. Detailed proposals

3.1 Current position

Certain channels have direct agreements with Freely's Device and OS partners (rather than with Freely itself, via Everyone TV). These channels are listed in the 1001+ LCN range, which is numerically continuous with, but does not form part of, the Freely EPG.

The Freely LCN Policy (v1) states that LCNs 31 and 90-99 may be used "for promotional purposes to draw viewers' attention to new features and content on the platform".

3.2 Proposed change

We propose to amend the Freely LCN Policy to permit the listing of Device and OS partner channels within LCNs 31 and 90-99 on the Freely EPG, subject to commercial agreement between Everyone TV and its Device and OS partners.

3.3 Selection of channels for LCNs 31 and 90-99

Everyone TV will invite Device and OS partners to nominate candidate channels for listing in LCNs 31 and 90-99.

To be eligible to for inclusion in the LCNs 31 and 90-99, channels must comply with the Freely LCN Allocation Terms and Conditions² and Freely's Scope of Access requirements for IP-delivered channels³. These requirements include (but are not limited to):

² <http://everyonetv.co.uk/freelylcnterms>

³ <https://www.everyonetv.co.uk/freelyscopeofaccess>

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- The channels must play within the Freely Player and must be delivered to our standard technical specifications
- Channels must either hold an Ofcom broadcasting licence or be under common control with a company that holds an Ofcom broadcasting licence
- The channels must ensure compliance with all Ofcom Codes applicable to broadcast television licensees
- The feature set available for these IP streams will be in line with that available as standard across the Freely Player
- Channels in these LCNs must meet the definition of 'Entertainment' as per the Freely LCN Policy

Everyone TV will not agree to list any channel in LCNs 31 and 90-99 that does not meet the eligibility criteria set out above.

For the avoidance of doubt, if a Device or OS partner uses these LCNs to list its IP channels, those channels will not appear on devices from other Device and OS partners who have listed different channels, or no channels, in those LCNs.

3.4 Initial ordering of channels within LCNs 31 and 90-99

Once agreement has been reached on the channels to be listed, it will be for the Device/OS partner to specify its preferred ordering of channels within that range in the first instance. Everyone TV would normally expect to approve the Device/OS partner's preferred ordering of channels unless there are exceptional reasons not to, in the interest of viewers and/or the platform.

3.5 Ongoing management of LCNs 31 and 90-99

Following the initial listing of Device/OS partner channels in LCNs 31 and 90-99, the normal rules of the Freely LCN Policy (as amended from time to time) will apply to those channels, save that:

- Device/OS partner channels will not be eligible to move into other LCNs in the Freely EPG (meaning, for example, that those channels would not be eligible to move into vacated LCNs outside the 31 and 90-99 range);
- For the purpose of reordering/swaps within the Device/OS partner LCNs, the channels will be treated as if they were under common control with the relevant Device/OS partner;
- LCN trading will not apply;
- Where Everyone TV carries out a Periodic Reordering, it will not change the order of channels within the 31 and 90-99 range. However, Everyone TV reserves the right to move the range of LCNs allocated for Device and OS Partner channels within the Freely EPG where warranted in the context of a Periodic Reordering.

4. Questions for consultation

Respondents are invited to respond to the following questions. In particular, if respondents disagree with Everyone TV's proposals, they should provide reasons, evidence, and, if appropriate, alternative proposals.

Q1. Do you agree with the proposal to enable Device and OS partner channels to be listed within LCNs 31 and 90–99 on the Freely EPG?

Q2. Do you agree that channels for inclusion in those LCNs should be agreed between Everyone TV and Device/OS partners on the basis of the same eligibility criteria as other Freely channels?

Q3. Do you agree that the listing of agreed channels within LCNs 31 and 90–99 should be determined by Device/OS partners with Everyone TV reserving the right to specify an alternative listing in exceptional circumstances?

5. Timetable and how to respond

Response deadline: 13th March 2026 at 17:00 (UK time).

Submission method: Please submit your response via email to consultation@everyonetv.co.uk. Please include the subject line "Freely Promotional LCNs Consultation".

Publication of responses: Unless respondents request confidentiality, non-confidential responses may be published.