



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

## STATEMENT

Published: 13<sup>th</sup> April 2026

## Executive Summary

On 13 February 2026, Everyone TV published a consultation on proposed revisions to the Freely LCN Policy relating to the use of Promotional LCNs 31 and 90–99 (the *Consultation*). The Consultation sought stakeholders' views on proposals to permit the listing of certain Device and Operating System (OS) partner channels within those LCN ranges on the Freely electronic programme guide (EPG), subject to specified eligibility criteria and governance arrangements.

The consultation closed on 13 March 2026. Everyone TV would like to thank all respondents for taking the time to engage with the Consultation and for the constructive feedback received.

Having carefully considered all responses, Everyone TV has decided to implement the proposals set out in the Consultation **in full**.

In addition, Everyone TV has taken the opportunity to make a small number of clarifications to the Freely LCN Policy. These changes do not alter the policy's effect or the underlying allocation principles.

An updated version of the Freely LCN Policy (v1.1) has been published alongside this statement and **takes effect immediately**.

## 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 substantive changes to the Freely LCN Policy concern only the use of LCNs 31 and 90–99 on Freely, which were previously reserved for promotional use.

We have also made clarifications to the Freely LCN Policy, which:

- remove detailed explanation of how the original Freely LCN lineup was determined at launch, which is no longer required for the ongoing management of Freely LCNs. However, the organising principles remain in the updated Policy, and the full explanation remains publicly available on our website<sup>1</sup>
- reorder and reorganise some paragraphs of the Policy to improve the logical flow of the Policy, as a consequence of the above
- clarify rules about 'visualised' radio services, in line with market developments.

Since these clarifications do not alter the Policy's effect or the allocation principles, they were not subject to consultation.

No part of this statement affects the LCN Policies for Freeview, Freeview Play or Freesat.

## 2. Decision

Everyone TV has concluded, in the light of the responses received to the Consultation, that the proposals consulted on are appropriate, proportionate, and consistent with the objectives of the Freely platform. In particular, Everyone TV is satisfied that the changes:

- **support improved discoverability** of relevant services for viewers;
- **provide greater operational flexibility** for Device and OS partners within clear and transparent parameters; and
- maintain a **fair, reasonable and non-discriminatory** approach to LCN management.

Accordingly, the Freely LCN Policy has been amended as proposed.

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<sup>1</sup> <https://www.everyonetv.co.uk/sites/everyonetv/files/2024-01/freely-lcn-consultation-statement-jan-2024.pdf>

### 3. Responses to consultation questions

#### Respondents

We received responses from seven channel providers: the BBC, ITV, Channel 4, Channel 5, Hearst Networks UK, Together TV, and one channel provider whose response was confidential.

We also received a response from Arqiva, the communications service and infrastructure provider that operates the broadcast transmission network to deliver digital terrestrial television (DTT) and holds two national commercial DTT multiplex licences.

#### General comment on timing of this consultation

Together TV suggested that Everyone TV consider postponing this consultation until new legislation and regulatory regimes affecting Freely have been implemented, namely:

- Ofcom's recommendation<sup>2</sup> that DCMS designate Freely as a Regulated TV Selection Service, which Together TV said could lead to new public service prominence rules to be incorporated into the Freely LCN Policy, and
- DCMS's Statement<sup>3</sup> on the Future Regulation of Television Electronic Programme Guides, which will see Freely's EPG designated as a regulated EPG. Together TV said this "will include a new licensing regime for Freely – this may include requirements which do not align with the channel licensing requirements detailed in ... the Consultation."

We note that Ofcom's Draft Code of Practice for Regulated Television Selection Services (TSS)<sup>4</sup>, insofar as it relates to the listing of linear TV channels, states (at paragraph A4.2): "Nothing in this recommendation ... applies to a live TV area which is a regulated electronic programme guide." Since Freely's EPG is expected to be regulated soon, the forthcoming TSS Code of Practice is not relevant to this consultation. Everyone TV will consider whether the Freely LCN Policy needs to be updated in the light of Ofcom's Code of Practice on Electronic Programme Guides once Freely's EPG is regulated. However, that is beyond the scope of this statement.

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<sup>2</sup> [Statement: Final report to the Secretary of State on the designation of television selection services](#)

<sup>3</sup> [Government statement on the future regulation of television electronic programme guides - GOV.UK](#)

<sup>4</sup> Available at: [Consultation: Prominence and accessibility on connected TV platforms - Draft code of practice and draft guidance on the agreement objectives](#)

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With regard to Freely's EPG becoming regulated, we acknowledge that this will require all channels accessible from the Freely EPG to hold a broadcast licence. The consultation proposals state that all channels must comply with Freely's Scope of Access requirements; those requirements will be updated in due course to reflect the new regulatory position.

We therefore do not believe that either of the forthcoming regulatory changes referenced by Together TV represent a reason to delay this consultation.

**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?**

Summary of responses

The BBC, ITV, Channel 4 and Channel 5 agreed with the proposal.

The BBC said it believes the proposal “will offer device manufacturers and OS partners a compelling, commercial opportunity to list and showcase some of their FAST channel offerings in the slots”. The BBC added that this will “enhance Freely's standard broadcaster offer” and as such will “benefit audiences”.

Hearst Networks UK was broadly supportive of the proposal, stating:

*“Everyone TV's partnerships with Device and OS partners are fundamental to Freely's reach and we recognise that those partnerships need to deliver tangible value to all participants if the platform is to grow. Bringing partner channels into the Freely EPG is a reasonable way of achieving that, and a wider Freely footprint across more devices is good for all broadcasters on the platform, including Hearst Networks UK.”*

However, Hearst Networks UK asked Everyone TV “to address one significant concern before the policy is finalised”. It was concerned that the Freely EPG in LCNs 31 and 90–99 “will look materially different depending on which TV brand a viewer owns”. It noted that:

*“The EPG has always functioned as a universal navigation tool, giving viewers a consistent and predictable experience regardless of their device. That consistency is fundamental to how audiences discover and return to channels. Introducing a range of LCNs where the channel lineup varies by manufacturer risks creating genuine audience confusion and undermines the integrity of the EPG as a platform-wide guide.”*

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Hearst Networks UK therefore requested that Everyone TV should set out, ahead of implementation, “what steps it will take to manage that audience fragmentation risk and how it will ensure the viewer experience remains coherent across devices.”

Together TV did not agree with the proposal, stating “they run counter to the Everyone TV’s Vision of free TV ecology”, which it characterised as “to ensure British content made for British audiences remains easily accessible and discoverable”.

Together TV believed that LCN 31 “should be part of an EPG shuffle”, so that an existing channel at LCN 32 onwards could move into it. It said that LCNs 90–99 “should be reserved for channel launches for existing Freeview broadcasters and second channels they wish to bring alongside it (as per 5.2 – 47 of the Freely LCN Policy and also section 46).” It felt this would “support the migration of the under-strain free TV ecology.”

Together TV argued that “Device and OS partners are not as invested in making IP-delivered linear TV work as broadcast channels who need to migrate to new distribution platforms” and that “These Device and OS partners ... have no commitment to Everyone TV’s vision and mission”. It went on to claim that “Channels under ‘common control’ of Ofcom-licensed groups may well systematically veer towards larger US channel groups already operating channels on these OS platforms, rather than Ofcom licensees broadcasting British content.”

Together TV also stated that “the commercial model these OS Partners run is not favourable to broadcasters due to a) control of advertising sales b) revenue share model extracting value from content providers c) disintermediation from direct relationships with audiences and d) delivery costs supplying content via approved Device and OS Partners technology vendors only.”

Together TV also said “We recognise Everyone TV’s desire to be inclusive for Device and OS Partners on Freely but this route could lead to a reduction in the breadth and variety of the Freely offer as smaller channel groups, independent channels and new entrants are squeezed out of the main Entertainment section into 101-249, which will be materially worse in terms of prominence.”

Arqiva also did not agree with the proposal, stating:

*“First, Device and OS partner channels already have an established area within the ch.1000s range on the Freely EPG so moving these service(s) to the main entertainment section is unnecessary.*

*Second, there is likely to be demand for the available slots from established entertainment channels available on Freeview, which hold DTSPS licences, and these should be prioritised over provision to Device and OS partner channels.*

*With the available LCNs and the scope to fill in gaps in the Freely EPG, we believe that the most appropriate solution is to offer LCNs 31 and 90–99 to channels already being broadcast on Freeview within its entertainment section of 1–99. Under that approach, viewers would get additional established entertainment channels which are fully regulated with DTPS licences.*

*On LCN 31 specifically, we see no reason why the existing Freely Vacated LCNs procedure should not be used to close the gap at LCN 31 if it is available rather than bypassing that and offering it to Device and OS partners. This would permit established entertainment channels to access the LCN slot which is fairly high-up the EPG.”*

A confidential response from a channel provider requested that OS and Device partners should not be able to distribute a channel within the Freely EPG without the channel provider's permission; in particular, it was concerned about a scenario whereby a channel is already available in the Freely EPG, and is then also nominated by an OS/Device partner for inclusion in the OS and Device partner range. The confidential respondent suggested that Everyone TV should seek permission from the channel providers before allocating LCNs in this range.

The confidential response from a channel provider also raised a number of questions about the implications of these proposals for commercial agreements between Everyone TV and standard Freely channel providers; between Everyone TV and its Device and OS partners; and between Device and OS partners and channels that they nominate for LCNs 31 and 90–99. These questions are outside the scope of this consultation, and Everyone TV will discuss directly with the channel provider.

### Everyone TV's response

We note Arqiva's point that the 1001+ LCN range is already available to Device and OS partners for the listing of their channels<sup>5</sup>. However, we do not agree that the existence of those LCNs means there is no case for Device and OS partners also having access to some LCNs within the Freely Entertainment genre. Everyone TV's partnerships with Device and OS partners are key to ensuring that Freely is easily and widely available to UK viewers. It is therefore reasonable that we help to improve discoverability of relevant Device and OS partner channels in a manner consistent with the viewer experience on Freely. As noted by Hearst Networks UK, bringing some Device and OS partner channels

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<sup>5</sup> The 1001+ LCN range is numerically contiguous with, but does not form part of, the Freely EPG, and it may be used by Device and OS partners to allocate LCNs according to their own listings policy.

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into the proposed LCNs could help to build “a wider Freely footprint across more devices”, which would be “good for all broadcasters on the platform”.

We note Together TV’s comments that Device and OS Partners “are not as invested in making IP-delivered linear TV work as broadcast channels who need to migrate to new distribution platforms”, and “have no commitment to Everyone TV’s vision and mission”, but we do not agree. Everyone TV’s partnerships with Device and OS partners are key to ensuring that Freely is easily and widely available to UK viewers.

We believe that Together TV’s concern about non-licensed channels, and Arqiva’s point about “fully regulated” channels, will be adequately addressed by Freely’s EPG becoming regulated, following which all channels listed on the Freely EPG will require an appropriate broadcasting licence.

Regarding Together TV’s concern about the commercial model that Device and OS partners use with broadcasters, nothing in our proposals would compel any broadcaster to make a commercial agreement with an OS or Device partner. Together TV itself has already been allocated LCN 52 on Freely, on the basis that it operates a DTT (Freeview) channel, and if it were to choose to enter into agreement directly with Everyone TV to operate a Freely-compliant IP stream, then that stream would appear at LCN 52.

Regarding Arqiva’s concern that “there is likely to be demand for the available slots from established entertainment channels available on Freeview”, and Together TV’s suggestion that LCNs 90-99 be reserved for “existing channel launches for existing Freeview broadcasters and second channels they wish to bring alongside it (as per 5.2 – 47 of the Freely LCN Policy and also section 46)”, we note that Freely LCNs have already been allocated to all existing channels that broadcast via DTT (i.e. channels that are also available on Freeview). Any new channels that launch on DTT will also be offered a Freely LCN according to the Freely LCN Policy. (The sections of v1.0 of Freely LCN Policy cited by Together TV relate to the initial LCN allocation process, used for Freely’s launch lineup, and do not cover ongoing management of Freely LCNs.)

We recognise, as noted by Together TV, that new Entertainment channels will be allocated LCNs in the 101+ range. However, this will happen regardless of the proposals in this consultation in the normal application of the Freely LCN Policy. LCNs have already been allocated or reserved (according to the principles in the Freely LCN Policy v1.0 paragraph 46) up to and including LCN 143.

We acknowledge Hearst Networks UK’s concern about the possibility of inconsistency in the LCN lineup between different devices, and their concern that this could lead to viewer confusion and audience fragmentation. However, we note that the vast majority of Freely channels will be on the same LCN on all devices. We will ensure that all Freely viewer touchpoints (including the EPG itself, the Freely website, and Freely viewer support

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routes) are carefully managed to avoid viewer confusion. Everyone TV has extensive experience of managing TV platforms where the LCN lineup can differ between one device and another (for example, Freeview HD devices which offer channels that are not available to older Freeview devices) and we are confident that offering a slightly different channel lineup on different devices will not be detrimental to the viewer experience or lead to confusion or audience fragmentation.

We note the confidential response from a channel provider which requests that, before allocating LCNs in this range, Everyone TV should ensure that channel providers agree to their channels being listed there. It will be for OS and Device partners to ensure that they have consent from channel providers; as part of the LCN allocation process, Everyone TV will require OS and Device partners to confirm they have such consent.

### Decision

We will adopt the proposal detailed in the consultation document.

We will ensure that all viewer touchpoints (including the EPG itself, the Freely website, and Freely viewer support routes) are carefully managed to avoid viewer confusion.

Before allocating LCNs in the OS and Device partner range, we will require OS and Device partners to confirm that they have the consent of all channel providers whose channels they propose to include in the range.

**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?**

### Summary of responses

The BBC, ITV, Channel 4, Channel 5 and Hearst Networks UK agreed with the proposal.

While Together TV did not agree that LCNs 31 and 90–99 should be reserved for Device and OS partners, they did agree that: “If the outcome of this consultation is that Device/OS partner channels will be included then they must meet the same eligibility criteria as other Freely channels.” They stated that this should include minimum broadcast hours, and that all channels in these LCNs should be suitable for the Entertainment genre.

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Together TV also argued that “These channels should be subject to a similar and proportionate Reach and Allocation process to ensure they are allocated in a way that is Fair, Reasonable and Non-Discriminatory to the existing Freeview broadcast channels.”

Together TV added: “Another consideration is how any new public service channel launches would be allocated or impact this policy ... considering non-PSB channels could find themselves shunted into 101-199 by new PSB launches should Device/OS Partners be allocated 90-99 rather than opening them up to existing channels. It would be good to detail how this would work and how periodic reordering ... would be impacted by these changes.”

Arqiva stated that “Any channel launch on Freely should be governed by the terms set out in the existing LCN policy, noting obligations to PSBs. This should apply to all new launches without exception.”

### Everyone TV's response

We note Together TV's comment that LCNs 31 and 90–99 sit within the Entertainment genre, and should only be allocated to channels that meet the appropriate genre definition. We can assure Together TV that, as per the proposals in the consultation document, “Channels in these LCNs must meet the definition of ‘Entertainment’ as per the Freely LCN Policy”.

We note Together TV's comment that all channels should comply with minimum broadcast hours, and we can reassure them that, as per the proposals in the consultation document, “the normal rules of the Freely LCN Policy (as amended from time to time) will apply to those channels”, save for the specific exemptions relating to: eligibility for vacated LCNs outside the 31 and 90-99 range; LCN trading; Periodic Reordering; and definition of common control for the purpose of LCN swapping.

Together TV believes that Device and OS partner channels “should be subject to a similar and proportionate Reach and Allocation process as other channels on the platform”, while Arqiva believes that “Any channel launch on Freely should be governed by the terms set out in the existing LCN policy ... without exception.” In relation to Together TV's comment, we understand that the Reach and Allocation process referred to by Together TV relates to the initial allocation of LCNs for the launch of Freely, and during Periodic Reorderings, but not to the ongoing management of Freely LCNs between those points. As for Arqiva's comment, the purpose of our proposal, as explained under Q1 above, to enable Device and OS partner channels to be listed in the Freely EPG is to improve the discoverability of those channels and to give Device and OS partners greater operational flexibility. To achieve that, we consider it appropriate to allocate a discreet range of LCNs

to Device and OS partners, with allocations to be made strictly within those LCNs, rather than using the same allocation method as for other Freely channels. If, for example, ten different Device and OS partners each launched eleven different channels on Freely, and each of those channels were subject to the full normal LCN allocation principles, then we may require 110 different LCNs for them, which would clearly be inefficient and unworkable in practice. We also note that Everyone TV's various LCN Policies occasionally contain limited exceptions to some rules, where those rules are not suitable for certain categories of channel, and where this proportionate and justified.

Together TV asked about how the proposals in this consultation would impact the allocation of LCNs to any new public service channels that may launch in the future, and whether non-public service channels would be 'shunted into 101-199'. The Freely LCN Policy does not contain any automatic provisions for moving existing channels to create a slot for new public service channels. As per the Policy, if there is no suitable vacant slot available to meet the minimum prominence obligations, we will consider any appropriate methods of creating a suitable slot for a public service channel, issue a consultation, and decide which method to adopt in the light of the responses received.

Together TV asked how Periodic Reordering would be impacted by these changes. For reasons outlined above, the Device and OS partner channels will be allocated within a particular range of LCNs. They will not be eligible to move into other LCNs in the Freely EPG, regardless of their reach at the point of the Periodic Reordering. Meanwhile, there would be no reason for Everyone TV to reallocate channels within the Device and OS partner range of LCNs at the point of a Periodic Reordering, since Device and OS partners would then be able to reorder them to their original configuration (using the same LCN reordering rights as standard Freely channel providers, except that they will be limited to using LCNs within the prescribed range).

However, as stated in the consultation document, Everyone TV reserves the right to move the Device and OS partner range in its entirety, where warranted in the context of a Periodic Reordering.

### Decision

We will adopt the proposal detailed in the consultation document.

**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?**

Summary of responses

The BBC, ITV, Channel 4 and Channel 5 agreed with the proposal.

The BBC said “We would hope that Device and OS partners will be well informed as to which channels from their portfolio should be allocated into the promotional LCNs in such a way as to delight the Freely viewer”, and that “it is entirely fitting for Everyone TV to be able to reserve the right to specify alternative listings in exceptional circumstances so as to ensure that the quality of these channels remains consistent and in-keeping with the rest of the Freely EPG”.

Hearst Networks UK did not disagree with the proposal, but stated: “Allowing Device and OS partners to determine the ordering within that range places significant editorial influence over the EPG. We would ask Everyone TV to be specific about what constitutes exceptional circumstances. We would also note that Everyone TV's reserved right to relocate the entire 31 and 90-99 range during a Periodic Reordering, combined with device partners controlling the day-to-day ordering within it, creates a degree of EPG instability in that range.”

Together TV did not agree with the proposal, stating: “Device/OS partners should propose a channel line-up to Everyone TV and then Everyone TV should assign LCNs in accordance with the channel ordering rules which apply to broadcast channels. To do otherwise would not meet FRND requirements.”

Arqiva also did not agree, stating: “Only ETV should be responsible for the LCN listing policy as this will ensure that there is a consistency on the Freely platform for the primary services. Permitting the Device and OS partners to develop their own rules will undermine the Freely LCN and risk confusion for viewers who would receive an inconsistent service across TV providers.”

Everyone TV's response

We note Hearst Networks UK's comment that “Allowing Device and OS partners to determine the ordering within that range places significant editorial influence over the EPG”, and Together TV's concern that “Everyone TV should assign LCNs in accordance with the channel ordering rules which apply to broadcast channels” and that “To do otherwise would not meet FRND requirements.” We do not agree with these comments and consider that our proposals are both FRND and consistent with our approach

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generally in the Freely LCN Policy. Under our proposals for LCNs 31 and 90-99, Device and OS partners will not have any greater influence over the ordering of channels on the EPG, or any greater flexibility, than any Freely channel provider operating a portfolio of channels, all of whom are free to reorder the channels within their portfolio or replace a channel with a different channel in their portfolio at the same LCN.

If any standard Freely channel partner were to launch several non-public service channels at the same time in a particular genre, they would be able to specify their preference for the relative LCN order of those channels. Similarly, we believe it is pragmatic to invite Device and OS partners to initially specify their preferred ordering.

However, Everyone TV is the EPG provider for Freely and it is important that we retain overall control of LCN allocation. For this reason, we reserve the right to not approve the Device and OS partner's preferred ordering of channels where there are exceptional reasons not to, in the interest of viewers and/or the platform. Such circumstances are difficult to predict – our experience of operating TV platforms that permit LCN swapping has shown that channel providers, incentivised to increase viewership, very rarely make decisions about the order of their channels that run contrary to the interest of viewers and/or the platform. For this reason, while we note Hearst Networks UK's request that we specify what would constitute "exceptional circumstances", we are unable to be prescriptive, but must retain the right.

We note Hearst Networks UK's point that, since Everyone TV reserves the right to move the Device and OS partner LCN range as a whole in the future as part of a Periodic Reordering, and since Device and OS partners will be able to reorder channels within the range, there could be "a degree of instability within that range". However, given that standard Freely channel providers have the right to reorder, replace and trade LCNs within their portfolio, and given that Periodic Reordering will apply to the majority of channels on the platform, we do not believe that the Device and OS partner range will necessarily be less stable than other parts of the LCN listing.

Regarding Arqiva's concerns about an inconsistent LCN order and the risk of viewer confusion, we have addressed concerns about inconsistency and viewer confusion in our response under Q1.

### Decision

We will adopt the proposal detailed in the consultation document.

## 4. Other clarifications to the Freely LCN Policy

In addition to implementing the proposals consulted on, Everyone TV has taken the opportunity to make a small number of clarifications to the Freely LCN Policy, intended to improve clarity and usability. These changes do not alter the policy's effect or the underlying allocation principles and are not subject to consultation.

### 4.1 Removal of historic detail on the original Freely LCN lineup

The updated Policy removes detailed explanation of how the initial Freely LCN lineup was determined at launch. This information is no longer required for the ongoing management of Freely LCNs, and its removal makes the policy shorter and easier to navigate.

The key organising principles that were used to decide the initial LCN lineup remain in the updated Policy, and the detailed explanation remains publicly available in Everyone TV's original Freely LCN consultation statement<sup>6</sup>, which is linked from the updated Policy (v1.1).

We have made a number of further changes as a consequence of the above, including the reordering and reorganisation of some paragraphs of the Policy to improve the logical flow of the Policy. These changes are not intended to make any substantive change to the Policy.

### 4.2 Clarification of rules for 'visualised' radio services

We have also taken the opportunity to make an additional minor clarification to the Policy, to reflect market developments in visualised radio services.

These clarifications are intended to provide greater flexibility and certainty for channel providers. They do not require any existing service to move to a different LCN and do not introduce new substantive obligations on channel providers.

## 5. Next steps

The updated Freely LCN Policy (v1.1) is effective immediately. Everyone TV will work with Device and OS partners to implement the new arrangements in line with the Policy and will continue to keep the operation of the Freely LCN framework under review.

Everyone TV is grateful to all stakeholders who contributed to the Consultation and remains committed to engaging openly and transparently on future Policy developments.

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<sup>6</sup> <https://www.everyonetv.co.uk/sites/everyonetv/files/2024-01/freely-lcn-consultation-statement-jan-2024.pdf>