

# Consultation

## Defining geographical boundaries for local TV services on Freely

Published: 7<sup>th</sup> July 2026

Response date: 1<sup>st</sup> September 2026

## 1. Executive Summary

This consultation sets out Everyone TV's proposed methodology for defining the geographical boundaries within which Local TV services will benefit from public service prominence when delivered over IP on the Freely platform.

Our proposal aligns IP coverage areas with a maximal interpretation of the coverage achieved by each local TV channel's existing digital terrestrial television (DTT) transmissions. We consider this to be an objectively justifiable, fair and reasonable approach. Other approaches were considered but did not pass the same tests.

We invite stakeholders' views on our proposals before 17:00 on Tuesday 1<sup>st</sup> September 2026.

## 2. Introduction

### 2.1 About Everyone TV

Everyone TV is responsible for the day-to-day operation of the UK's three main free TV platforms – Freeview, Freesat and Freely. We are owned and supported by the UK's leading public service broadcasters – the BBC, ITV, Channel 4 and 5.

At the heart of everything we do is a belief that everyone should be able to access great quality TV, regardless of location or income. We are the champions of free TV, of what it delivers for viewers and the positive impact it has on wider society.

### 2.2 Freely LCN Policy objectives

The objectives of the Freely LCN Policy<sup>1</sup> are to:

- Make it easy for viewers to find content
- Ensure public service channels remain prominent
- Protect consumers from potential harm (e.g. ensure children's content is distant from any adult content)
- Allocate and manage logical channel numbers (LCNs) fairly and efficiently

We also aim to give channel providers the opportunity to reach viewers and make it easier for viewers to transition to IP-delivery for free TV in medium to long term.

### 2.3 Background

In our Freely LCN Policy consultation<sup>2</sup>, we said that we would consult separately on how we would determine the geographical boundaries within which local TV services are entitled to appropriate public service prominence when transmitted via IP.

#### Local TV licensing

Local television services each hold an Ofcom Local Digital Television Programme Service (L-DTPS) licence to broadcast on a regionalised DTT multiplex, Multiplex L. Comux UK, the operator of Multiplex L, holds an Ofcom licence to operate the DTT multiplex for L-DTPS services.

The Technical Plan for Multiplex L sets out detailed transmission parameters for each local TV service area. This plan forms a binding regulatory commitment on Comux UK; it must provide the individual transmissions described in the Technical Plan, for the delivery of the specified local TV services.

Multiplex L was built to provide coverage for the L-DTPS licence areas. In turn, L-DTPS licences were only awarded only in areas where Multiplex L coverage could be built.

Local TV services that are also delivered by means other than DTT, such as satellite or cable, also hold Ofcom Television Licensable Content Service licences. Such services are referred to as 'simulcast local services'.

#### Public service prominence

Public service channels are entitled to appropriate prominence on Regulated EPGs<sup>3</sup>. This entitlement is founded on section 310 of the Communications Act 2003, which places a duty on Ofcom to produce and maintain a code of practice for EPG providers. This code must secure an appropriate

<sup>1</sup> <https://www.everyonetv.co.uk/freelylcnpolicy/>

<sup>2</sup> <https://www.everyonetv.co.uk/sites/everyonetv/files/2023-06/ngp-lcn-consultation-30-Jun-2023.pdf>

<sup>3</sup> Although Freely is not currently a Regulated EPG, we expect it to be later in 2026

degree of prominence for public service channels, as defined by the Act, including local television services when carried on DTT and when simulcast on other platforms.

The resulting Ofcom EPG code<sup>4</sup> sets specific prominence requirements for public service channels. For example, all Regulated EPGs must have BBC One in the first slot and the relevant Channel 3 service in the third slot. The code requires local TV services to be listed in the top 24 slots when delivered over DTT. Ofcom does not specify an explicit level of prominence for local TV services when they are simulcast on platforms other than DTT. Instead, the EPG code requires providers to “determine an appropriate degree prominence in light of these channels’ nature and characteristics and their intended audience”.

At present, local TV services are only available to Freely devices through DTT, within the area covered by each station’s DTT transmitters. The geographical extent of DTT coverage implicitly determines the area in which local TV channels benefit from public service prominence. IP distribution, however, enables unlimited geographical distribution so, for local TV services (and in anticipation of Freely becoming a Regulated EPG), we need to actively define the area in which local TV services should receive public service prominence when they are delivered over IP.

While local TV services are entitled to appropriate prominence in the areas they are public service channels, they are not entitled to appropriate prominence outside those areas. To give prominence to local TV services outside the area in which they are public service channels would risk unduly favouring those services to detriment of other non-public service channels.

### **Freely LCN Policy**

The Freely LCN Policy allocates a single LCN to local TV services (8 in England, 9 in Scotland, Wales and Northern Ireland). This significantly exceeds Ofcom’s ‘top 24’ requirement for Regulated EPGs.

The Policy states that broadcasters may offer IP-delivered versions of their channels, with channels delivered over both DTT and IP sharing a single LCN. While public service channels are allocated an appropriately prominent LCN, the Policy recognises that some public service channels are only deemed to be such in certain nations or regions of the UK, and that they are treated as non-public service channels outside those areas. Regarding local TV, the Policy provides that entitlement to public service prominence will be determined in light of these channels’ nature and characteristics and their intended audience.

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<sup>4</sup> <https://www.ofcom.org.uk/siteassets/resources/documents/consultations/uncategorised/9660-epg/associated-documents/secondary-documents/code-practice-epg.pdf?v=324752>

### 3. Everyone TV's proposal

#### Summary

We have sought an objective method for determining the geographical extent of each local TV service's public service status, and so where it is entitled to a prominent LCN when delivered over IP on Freely. Although the EPG Code doesn't require an IP simulcast of a local TV service to be in a 'top 24' slot, we consider that it is in the best interests of viewers, local TV channels, and the efficient use of EPG slots, for DTT and IP variants of a service to share a single, prominent, LCN in areas where both are available.

We consider the DTT coverage area of each local TV service to represent an appropriate geographical boundary for prominence when the same service is delivered over IP. We are therefore proposing a method, set out in this section, that aligns IP coverage with a maximal interpretation of the coverage achieved by each local TV channel's existing digital terrestrial television (DTT) transmissions.

#### Local TV licensing framework

The Local Digital Television Programme Services Order 2012<sup>5</sup> defines a local digital television programme service as being "intended for reception only within a particular area or locality" and "meet[ing] the needs of the area or locality where it is received". It also places a requirement on Ofcom to specify the area or locality for each local digital television programme service. As part of the L-DTPS licence renewal process, Ofcom published a document<sup>6</sup> reiterating these elements of the regulatory framework.

Following the 2012 Order, Ofcom issued a Statement on Local Television Licensing<sup>7</sup> in which they undertook to consider requests for coverage extensions from licensees. In assessing such requests, Ofcom would consider whether the requested increase represented a natural extension or an overspill into an adjacent area. The statement also clarified that the local TV multiplex could only be built out to areas where there was an appropriately licensed local TV channel.

The L-DTPS licence itself requires the service to be provided in the licensed area. This is defined as being the location specified in the Technical Plan for Multiplex L<sup>8</sup>. Each L-DTPS licence also contains specific programming commitments for the individual service. Although wording differs between licences, there is a theme of local focus and serving people in the locality or within the licensed area.

As mentioned above, IP simulcasts of local TV services are entitled to appropriate prominence on Regulated EPGs based on their "nature and characteristics and their intended audience". Although this does not automatically mean that prominence for IP simulcasts should be geographically co-terminus with DTT coverage, given that local TV services are required to serve people in a particular locality, and that locality is defined as being the area in which they can be received, we consider the DTT coverage area represents the most appropriate geographical boundary for prominence when these channels are delivered over IP. In the next section we will describe the process we have used to map DTT coverage to IP boundaries.

#### DTT to IP mapping process

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<sup>5</sup> <https://www.legislation.gov.uk/ukxi/2012/292/article/3/made>

<sup>6</sup> <https://www.ofcom.org.uk/siteassets/resources/documents/manage-your-licence/tv/local-tv/local-tv-licensing---programming-commitment-delivery?v=331050>

<sup>7</sup> <https://www.ofcom.org.uk/siteassets/resources/documents/consultations/uncategorised/8143-local-tv/associated-documents/local-tv-statement.pdf?lang=en&v=321851>

<sup>8</sup> <https://www.ofcom.org.uk/siteassets/resources/documents/manage-your-licence/tv/mux/mux-l/2025/comux-licence-technical-plan-version-16.pdf?v=401657>

While IP coverage can be precisely defined at a postcode sector level, DTT coverage is variable and affected by several external factors. These include local topography, the presence of trees and tall buildings in the vicinity, the quality and condition of the viewer's aerial installation, and interference from other transmitters. We first therefore sought to define the extent of DTT coverage for local TV services before mapping it to address data.

We used computer algorithms to predict the DTT coverage area of each local TV service based on the transmission parameters provided in the Multiplex L Technical Plan. The algorithm was configured to provide an optimistic representation of coverage, with the output mapped to individual addresses. Postcode sectors containing addresses with DTT coverage form the basis of the IP coverage area.

As noted above, localised factors can impair DTT reception for an area within a station's overall footprint. Some of these areas are not predicted as having DTT coverage at all ("not spots"). Clearly, viewers in these areas still form part of a channel's intended audience; a hill causing localised loss of DTT reception does not change that. Given this, we brought any not spot postcode sectors into the IP coverage area. This results in a contiguous region with a single outer boundary.

In some cases, the predicted coverage of a local TV service approaches an existing boundary (e.g. of a BBC One or ITV1 region). In the interests of efficient management of the platform, we have in such cases extended the local TV boundary to meet the existing boundary in cases where the number of affected postcode sectors is small.

Some areas receive more than one Local TV service via DTT (an "overlap region"). As the local TV licensing regime is predicated on a single service in each location, we work on the assumption that any overlap regions are caused by DTT coverage 'overspill'. As Freely makes a single prominent LCN available to local TV services, we have assigned individual postcode sectors within overlap regions to the most appropriate local TV service. In doing so, we considered Local Authority boundaries as well as existing TV regions. We also aimed to keep the boundaries between local TV services outside areas of significant population as much as possible.

This work has produced a set of postcode sectors for every local TV service, defining where each should be capable of being available over IP. It therefore will enable us to allocate an appropriately prominent LCN to IP simulcast versions of local TV channels throughout the widest possible interpretation of their Ofcom licence area. We believe this process is objectively justifiable, meets viewer expectations, and is fair to the operators of both local TV and other Entertainment channels. We therefore propose to adopt the boundaries created by this process for IP-delivered local TV services on Freely and summarise the approach in the Freely LCN Policy. An indicative map of the resulting local TV coverage areas can be found in the Appendix of this consultation.

## 4. Alternative approaches

We considered other approaches to defining geographical boundaries for local TV but were unable to identify any that were consistent with the Freely LCN policy objectives, were coherent with the overall regulatory framework for local TV, were objectively justifiable, and could be applied on a fair, reasonable and non-discriminatory basis. The alternative options we have considered are summarised briefly below.

### Alignment with local authority areas

There is no consistent structure of local government throughout the United Kingdom or within England. While Northern Ireland, Scotland and Wales have a single tier of local government, England is comprised of both unitary authorities and two-tier authorities, with some areas of England also delivering services through Combined Authorities or Combined County Authorities.

Given these complexities, we could not create a “one size fits all” rule based on local government boundaries that could be applied fairly and equally to all local TV channels. Furthermore, local TV channels are licensed to serve viewers within their DTT footprint, which might cover parts of multiple local authorities operating different tiers of government, rather than viewers who receive public services from a particular local authority. To align with local authority areas would misalign prominence from intended audience.

### Alignment with existing TV regions

We have considered whether local TV boundaries could match existing BBC One and ITV1 regions. There is a “many to many” relationship between local TV channels and BBC/ITV regionality: some BBC/ITV regions have more than one local TV channel in them and some local TV channels can be received across more than one BBC/ITV region.

Making local TV channels available throughout the BBC/ITV region(s) in which they are located would require multiple Freely LCNs when only one is available. In any case, such a policy couldn't by its nature be fair to all local TV channels. Given that local TV channels are licensed to serve viewers within their DTT footprint, rather than in a particular BBC or ITV region, such an approach would misalign prominence from intended audience.

### Self-determination

We also considered whether there might be a role for the local TV industry in defining local TV boundaries. In operating the Freely EPG, we seek to ensure appropriate prominence for public service channels and to support fair and effective competition, under an objectively justifiable EPG policy. We consider that devolving responsibility for defining boundaries to individual local TV companies would not, on its own, provide a sufficiently objective basis for boundary setting. We feel a universal and consistent process is required to meet our policy objectives.

However, where there is an overlap between two or more adjacent services, and the local TV channels concerned agree on a different boundary than the one determined by Everyone TV, we will consider a request to change the boundary.

#### **Q1. Do you agree with our proposal to adopt the geographical boundaries created by the process described in Section 3 of this consultation for local TV channels delivered over IP on Freely?**

If you do not agree with our proposal, or elements of our proposal, please describe an alternative approach that meets our stated aims, is objective in nature, and is compatible with the wider Freely LCN Policy and its objectives.

Alternative proposals that are not supported by evidence may not be considered.

## 5. Operations across intra-UK borders

As noted above, local TV services are allocated LCN 8 in England and LCN 9 in Wales, Scotland and Northern Ireland. Meanwhile, LCN 8 is allocated to Channel 4 in Wales and the BBC Scotland channel in Scotland.

In one instance, a local TV channel based in England has significant coverage in both England and Scotland. As there is another service already allocated LCN 8 in Scotland, in this case it is necessary to treat the local TV service as a Scottish local TV service and allocate it LCN 9 across its entire area of operation.

**Q2. Do you agree with our proposal to treat, for the purposes of LCN allocation, the local TV channel with significant coverage in England and Scotland as a Scottish?**

If you do not agree with our proposal, please describe an alternative approach to provide separate LCNs for the affected local TV channel and BBC Scotland.

Alternative proposals that are not supported by evidence may not be considered.

## 6. Responding to this consultation

We encourage responses from all stakeholders in the Freely platform, including channel and technology providers, consumer groups, charities and viewers.

We will publish all non-confidential responses on our website. Please indicate on your response whether none, some or all of your response is confidential. In the absence of an indication to the contrary, responses will be treated as non-confidential.

To be considered, a response must reach Everyone TV by 17:00 on Tuesday 1<sup>st</sup> September 2026, unless Everyone TV accepts that mitigating circumstances apply.

Responses can be emailed to [consultation@everyonetv.co.uk](mailto:consultation@everyonetv.co.uk) or posted to: Nick Jeffery, Head of Platform Operations, Everyone TV, Triptych Bankside (North Building), 185 Park Street, London SE1 9SH.

## Appendix – Indicative Local TV Coverage Map

