



The BBC's response to Digital UK's consultation on the allocation of LCN 7

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The BBC welcomes the opportunity to respond to Digital UK's consultation on the allocation of LCN 7.

In October 2013, the BBC announced plans to close BBC Three as a broadcast linear channel and move to an online, on-demand model. Following a public value test process, this decision was approved by the BBC Trust in November 2015, since when the BBC has developed a transition plan to migrate the BBC Three audience to the online offer. As part of the approval to close BBC Three, a number of conditions were laid out by the BBC Trust, in particular around how the audiences would be migrated to BBC Three online.

The closure date for the BBC Three linear service has now been set as 16th February. After this date, and aligned to the BBC Trust's conditions around migration from the broadcast service, a transitional channel will run on all platforms for a period of time advising of the full closure of BBC Three linear channel and promoting the new content offer, as well as the audience's routes to access to BBC Three online. In the interest of achieving the best outcome for the DTT platform and its audiences, the BBC is working with Digital UK to confirm the transitional arrangement and the associated timings.

Moving on to the vacated EPG number, once BBC Three has fully left the DTT platform, the allocation of LCN 7 represents a particularly complex issue. Following the policy rules in Digital UK's DTT LCN policy, a vacated LCN shall first be offered to any PSB placed in a higher-numbered, less prominent¹ position. However, Digital UK's DTT LCN Policy does not ascribe any preferences or priorities amongst the PSB cohort of channels (for example, pan-UK vs national vs regional vs local) and in this particular instance, a number of PSB services currently share LCN 8. As such, all could arguably qualify to move to LCN 7 and any resultantly higher-numbered LCNs becoming vacated would then subsequently be allocated in accordance with PSB prominence rules as captured in the DTT LCN Policy. Thus, BBC Four would move to LCN 8 and then Local TV in Scotland and Wales would move to the vacated LCN 9. This particular approach is described further in Option I of Digital UK's consultation document. Adopting Option I would, however, imply some disbenefits :

- the DTT platform would miss the opportunity to provide a more audience-friendly solution to the deployment of the associated LCNs,
- this option avoids the issue of separation and lack of consistency in LCN across the UK for the Local PSB TV services,
- viewers to all the implicated TV services at LCNs 8, 9 and 23 (amongst which our own BBC Four and BBC ALBA) would be required to familiarise themselves with new channel numbers after the moves had been implemented. (We would note that BBC Four and BBC ALBA have both maintained the same EPG numbers on DTT since launch.)

¹ In line with terminology in Digital UK's DTT LCN Policy, any reference to 'higher services' or 'services down the EPG' is intended to refer to services which are placed at higher-numbered, less prominent, positions.

We therefore agree with Digital UK's recommended proposal to allocate LCN 7 to BBC ALBA and Channel 4 (Wales) and to then extend the Local TV reservation at LCN 8 for all Local TV services.

We believe this proposal to be the least disruptive and to affect a smaller number of viewers - it potentially involves much less disruption in that only BBC ALBA and Channel 4 Wales, as well as the Local TV services in Scotland and Wales at LCNs 8 and 23 respectively, would be affected. We would note also that given the specific geographic reach of these particular services, it should be possible to undertake some highly-targeted, on-air marketing in the run up to the planned changes in order to publicise the EPG moves on DTT.

With a stakeholder interest in the Local TV PSBs, by virtue of the funding provided by the BBC to get the Local TV project off the ground², we also recognise the potential marketing benefits that Digital UK refer to by way of having all Local TV services at a common EPG number, LCN 8.

At first sight, it could be remarked that, in promoting this approach, the BBC might be seen to be rebutting an opportunity to move BBC Four to a more prominent position in the EPG, albeit by just one slot. However, in this particular case, the BBC believes keeping BBC Four on the same EPG number avoids significant viewer confusion and is in the best interests of the platform. Crucially, this does not set any precedent for any future decisions in relation to the prominence of BBC services on EPGs - in this instance, the BBC is supporting Digital UK's recommendation because it provides the optimum balance in terms of delivering best interest for the platform and for viewers. We believe that the changes described in Option 2, when taken altogether, represent overall the least disruptive change to a smaller number of viewers in the first instance, but in the long-term will be the most advantageous for channel providers, the platform and audiences alike.

We also note that LCN 105, which is not subject to the same complexities, will be reallocated in accordance with provisions in Digital UK's DTT LCN Policy.

²http://www.bbc.co.uk/bbctrust/our_work/strategy/licence_fee/local_tv_contribution.html