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Response to Ofcom Consultation

Broadcast TV Technical Codes Updates and Amendments

Response from Digital UK

03 June 2016

This response is submitted by Digital UK on behalf of its Members – the BBC, ITV, Channel 4 and Arqiva - holders of the terrestrial Broadcasting Act and Wireless Telegraphy Act licences.

1. Introduction

About Digital Terrestrial Television (DTT)

Digital Terrestrial Television (DTT) is the UK's most popular TV platform. At the heart of DTT in the UK is Freeview – a universally available service offering a range of more than a hundred free-to-air TV, radio and text-based services. It is watched in more than 19 million homes, three-quarters of the total. Freeview is the sole television platform in more than 10 million homes.

Prior to digital switchover (DSO), more than four million UK households could not access Freeview and elsewhere signal strength was variable. Thanks to industry investment in excess of a billion pounds, switchover made Freeview available to 98.5 per cent of homes.

About Digital UK

Digital UK supports the UK's terrestrial TV service and its viewers.

We are responsible for day-to-day operational management, including the Freeview electronic programme guide, and lead on developing platform strategy, working with our broadcast partners and industry. We also provide viewers with information and advice about terrestrial TV channels, services and reception.

In September 2015 Digital UK and Freeview launched 'Freeview Play', the new connected TV service which seamlessly delivers on-demand content alongside linear broadcast channels.

Digital UK is owned by the BBC, ITV, Channel 4 and Arqiva.

2. Executive Summary

Digital UK has worked with its members, BBC, ITV, Channel 4 and Arqiva as holders of Broadcast Act and Wireless Telegraphy Act licences to provide this coordinated response to Ofcom's consultation Broadcast TV Technical Codes Updates and Amendments. Additional individual responses to this consultation may be provided by these organisations.

Digital UK's members note a number of proposed changes to the Television Technical Performance Code and Reference Parameters for DTT, many of which they agree with as the changes bring the Codes in line with current practices.

There are a set of items where Digital UK's members have identified approaches or alterations to Ofcom's proposal.

Outage reporting

Digital UK's members agree with the proposed revision to the reliability and fault reporting requirements in the Code and propose to offer a unified process for the provision of transmitter outage reporting to Ofcom for all of their multiplexes, including PSB1 (BBCA). Arqiva Transco has confirmed that it is feasible for it to provide a consolidated regular report directly to Ofcom. The precise format and delivery of the reports would be agreed between the multiplex licensees and Ofcom. Digital UK's members believe that this will provide a number of benefits to Ofcom as well as proving the most efficient method for this fault reporting.

Annual report template

Digital UK's members note the proposal to retain the Annual Reporting requirements set out in the Code but they propose that Digital UK produce an Annual Report template to allow consistent reporting to Ofcom. Again, Digital UK's members believe this will provide clear and useful reporting to Ofcom regarding the operation of the licensed multiplexes.

Lip-sync

Digital UK's members disagree with Ofcom's proposal to remove reference to lip-sync from the Code. They believe that retention of requirements to maintain accurate lip-sync is in the best interests of viewers and the DTT platform, underpinning the quality of a fundamental component of the broadcast.

3. Answers to questions

Question 1: Do you agree with the proposed amendments to the Television Technical Performance Code?

Removal of analogue TV and associated requirements

Digital UK's members agree with the proposal to remove the reference to transmission standards for analogue services and recommendations from section 2 of the Code.

Removal of Rules of Operation for Teletext

Digital UK's members agree with the proposal to remove the reference to the Teletext System rules of operation from section 2 of the Code.

Technical Quality procedures

Digital UK's members agree with the proposed changes to Section 3 Technical Quality Standards of the Code.

Subjective sound and picture grades for PSB channels

This response has no comment on the removal of the sound and picture grades for the commercial public service channels.

Lip-sync

Digital UK's members do not agree with the removal of the lip-sync requirement from the Code. They believe that accurate lip-sync is a key measure of TV quality, and that where lip-sync errors occur these are of significant annoyance to viewers.

They recognise that the introduction of lip-sync errors is not as common in the digital TV production and distribution chain as could be the case in analogue. However, they note that, unlike analogue where a few broadcasters were responsible for a small number of services, digital TV broadcasting has resulted in a larger number of services from a significantly wider range of operators.

Given the growth in service operators, Digital UK's members believe that retaining a codified quality requirement regarding lip-sync provides a position that benefits viewers and the DTT platform.

RBL performance

Digital UK's members agree with the proposed removal of minimum performance standards for re-broadcast links (RBLs).

Reliability

Digital UK's members agree that the minimum transmitter availability requirements of 99.8% for 'reference' transmitters and 99.0% for all other transmitters provides an important regulatory tool which ensures a minimum standard of service to DTT viewers.

Digital UK's members note Ofcom's proposal for the categorisation of the 'reference' transmitters but believe that for consistency Pendle Forest should be added to the list of reference transmitters.

In relation to paragraph 3.32 of the consultation, the BBC and Digital 3 & 4 would like to take this opportunity to clarify that in operating their networks of relay stations their distribution and transmission strategy and approach are founded upon public service values and licence commitments over and above “commercial or market incentives” and are centred on providing reliable services to viewers.

Transmitter Outage Reporting

Digital UK’s members welcome the proposal to rationalise the required reporting and are happy to comply with the re-introduction of ‘live’ fault and outage reporting.

Noting Ofcom’s proposal to agree specific thresholds with individual multiplex operators directly, Digital UK’s members would like to propose that a common set of reporting thresholds be adopted across all multiplexes, with Arqiva producing the daily report on the collective behalf of all operators. Reports detailing events occurring outside of the set thresholds would be sent to a dedicated Ofcom e-mail address on the next working day.

This proposed approach benefits both Ofcom and the multiplex operators:

- Timely reporting: As the transmission provider, Arqiva is best placed to provide Ofcom with the most efficient daily reporting.
- Comparable reporting: Agreeing a single set of thresholds across all operators of the DSO multiplexes would allow Ofcom to compare the availability of each multiplex.
- Standardised approach: As well as reporting against a standard set of metrics, the format and delivery of reports would be standardised, allowing Ofcom to establish a single, efficient approach to monitoring and reviewing reports.

Digital UK’s members further propose, following consultation with Arqiva Transco, that the events meeting the following criteria would be reportable:

- For reference sites, a transmission operating at less than -3dB relative to nominal ERP for a period of thirty minutes or more;
- For other sites, a transmission operating at less than -3dB relative to nominal ERP for a period of two hours or more.

The BBC has agreed that faults that meet these thresholds on the PSB1 multiplex would also be provided to Ofcom via this report.

Given that the purpose of this reporting is to inform Ofcom of the reliability of the networks under the multiplex operators’ control, the proposal incorporates a number of exclusions:

- No reporting of outages as a result of RBL failures would be provided;
- No reporting of outages as a result of mains power failures would be provided;
- No reporting of outages as required for planned work would be provided.

Digital UK’s members will collectively write to Ofcom to agree the details of this report.

Annual Technical Reports from Broadcasters

Digital UK’s members note the proposal to retain the requirement for Annual Technical Reports to be provided by the multiplex operators and propose to produce a template document that will allow all multiplex operators to provide a consistent Annual Technical Report to Ofcom.

To assist in the development of this template, Digital UK's members will write to Ofcom to agree the details of these reports including what Ofcom believes qualifies as a 'notable' technical change or development on a multiplex.

This response has no comment on the additional reporting required of the Commercial PSBs.

Access Services

Digital UK's members agree with the proposal to remove the need for an apology message to be transmitted in the event that subtitles become unusable from section 4 of the Code given that Ofcom provides separate guidelines for the provision of television access services.

Other Matters

This response has no comment on the proposal to remove the separate availability requirement for the national Channel 3 licensee.

Coverage

Digital UK's members agree with the proposed revisions to the statement regarding Coverage in Section 5 of the Code.

Question 2: Do you agree with the proposed modifications to the DTT Reference Parameters?

Updating the DTT Transmission Modes

Digital UK's members agree with the proposed update to the DVB-T and DVB-T2 OFDM parameters to match the set currently broadcast.

Rationalising standard-definition picture resolution and audio bitrate requirements on Qualifying Services

Digital UK's members agree with the proposed removal of the recommendations concerning the bit-rates for audio coding and audio description service coding.

This response has no comment on the proposal to remove the resolution requirements for Qualifying Services from the Parameters.

Question 3: Do you agree with our proposal not to include an HEVC profile in the Reference Parameters at this stage?

Digital UK's members agree with the proposal not to include an HEVC Profile in the Parameters at this time on the basis that a multiplex operator may approach Ofcom with a proposal for HEVC services.