



The BBC's response to Digital UK's consultation on a proposal to reserve logical channel numbers within content genres for HD-only channels

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The BBC welcomes the opportunity to respond to this Digital UK consultation on a proposal to amend the LCN Policy to reserve logical channel numbers within the relevant content genres for HD-only channels.

The DTT EPG should provide easy access and discovery for viewers, and having the best quality content in the most prominent EPG positions is in the best interests of the platform and viewers. Thus, increased prominence of HD content in the EPG represents a coherent evolution that keeps the DTT platform competitive. At the same time, this would support the significant investments that broadcasters have made, and continue to make, in order to make their channels available in HD on DTT. Indeed, on other platforms (viz-a-viz Sky and Freesat), substitution of HD simulcast versions in the EPG has already been enabled, even at a granular regional level, and there should be evidence to point to changes in user behaviours with resulting benefits (for example, in viewing shares.) To that end, we would encourage Digital UK to look at evidence from other platforms and feedback from users around the benefits of HD positioning overall, and to be mindful of potential reputational and competitive risk to the platform. We would strongly recommend that Digital UK consider making LCN policy changes (including SD/HD substitution) appropriately in order to have a DTT EPG that is relevant, competitive and future-proofed.

To Digital UK's specific question posed in the consultation document, we note that the increase in supply of DVB-T2 configured DTT multiplex capacity, together with the continued constraints around the supply of DVB-T configured SD channel capacity has facilitated the launch of HD-only services and their subsequent listing into the HD technical genre (albeit only one such service has launched at the time of writing.)

In terms of the approaches that Digital UK have identified to avoid disadvantaging any HD-only channels in respect of their channel peers which do have SD simulcasts on the EPG, we agree with Digital UK's proposal set out at Option 2.

We believe the second option to be the most appropriate and one that will preserve the prominence of an HD-only channel in the EPG in advance of any move to enable full SD-HD substitution and then dissolve the HD technical genre. We note that with some exceptions¹ most channels have been awarded their EPG number and gained their prominence by virtue of their time of launching on to the platform. Reserving LCNs in the relevant content genre for any HD-only channels (whilst continuing to allocate in the HD genre also) will help future-proof the DTT EPG and preserve the general concept of EPG prominence for non-PSB services being linked to the timing of a channel coming on to the DTT platform.

Furthermore, we appreciate Digital UK's clarity around the fact that channel providers would have no rights to any LCNs reserved under this process, as well as the clarity around what would happen in the instance of an SD simulcast launching after the HD-only channel had launched into the EPG.

¹ For example, PSB services who are awarded prominent slots by virtue of their public-service status as referenced in the Ofcom Code on Electronic Programme Guides and the Communications Act 2003, or any channel that launched and simultaneously has taken advantage of the associated channels rule in the DTT LCN Policy.