



STV Pacific Quay Glasgow G51 1PQ Scotland
+44 (0)141 300 3000 stv.tv

26 January 2016

Sarah Fox
Digital UK
2nd Floor
7 Mortimer Street
London
W1T 3JF

consultation@digitaluk.co.uk

Dear Sarah

STV Central Limited and STV North Limited (together "STV")

I write to confirm STV's position in relation to proposed amendments to the LCN Policy to reserve LCNs for HD-only channels.

STV agrees that HD-only channels are likely to become more prevalent in future and welcomes Digital UK's consideration of how best to accommodate these within the Freeview EPG.

Digital UK has presented its consultation on this issue in terms of the effect on HD-only channels, however, it is also important to understand what the effect is on regionalised services which do not now, nor may ever have, full HD versions of all their SD variants. Channel 3 is such a network, where STV currently has four different versions of its SD service, but only one HD version which is available across the four SD regions.

Currently Channel 3 SD services are located at LCN 3 and Channel 3 HD services are at LCN 103 within the HD technical genre. It is entirely possible that at some point in the future a channel swap of HD services into SD LCNs may be implemented. However, given the additional costs of distributing an HD feed it is also likely that not all Channel 3 SD regions or sub-regions will have matching HD versions. In the absence of a dedicated technical genre for HD, we think it is vital that a memorable HD LCN remains available for non-native HD variants of PSB services that are available on SD. Such HD services would be both SD simulcasts in the regions where they match the SD service, and in other regions would be similar to, but importantly different enough from SD services to be considered HD-only channels.

This is already the case on Sky where STV makes available an HD version of its Channel 3 output. STV HD is a high definition version of the STV Central West micro region. In that region, STV HD and SD have swapped LCN positions however that is not the case in the three other STV micro regions, where STV SD channels retain their original LCN slots and STV HD is accessed on a separate LCN lower down the Sky EPG.

Whilst STV is in broad agreement with Digital UK's recommendation that Option 2 be adopted, we believe it is vital to understand what the future policy towards regional PSB services will be, since this may require reservation of an LCN now for those areas that may never have an HD version of a regional SD service.

This is an important and complex area that is impacted by the decision being made now on how to proceed with the allocation of HD-only LCNs. Consideration also needs to be given to how Digital UK's plans affect the curation of the Freeview EPG going forward, where the requirements of HD viewers and legacy SD-only consumers will differ.

STV welcomes further engagement with Digital UK to understand how this important consideration is included within future thinking together with confirmation that the LCN positions of HD versions of regionalised PSB services will not be negatively impacted by proceeding with Option 2 as proposed.

I look forward to hearing from you.

Kind regards.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Bobby Hain', with a long horizontal flourish extending to the right.

Bobby Hain
Director of Channels