



# Allocation of an LCN for the Freeview Accessible TV Guide

## STATEMENT

Published: 17 December 2019

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# 1 Executive Summary

## 1.1 About Freeview, Freeview Play and Digital UK

Freeview is the biggest TV platform in the UK, used in 18 million homes, giving viewers access to the country's most popular TV shows, for free.

Its connected TV service, Freeview Play, brings together the best of the UK's free content, live and on-demand from BBC iPlayer, ITV Hub, STV Player, All 4, Demand 5, UKTV Play, CBS Catchup Channels UK and Horror Bites. The service is available on the majority of smart TVs sold in the UK and with over 20,000 hours of on-demand content, has quickly become a 'must-have' feature for consumers. Freeview Play currently has 5.9 million active users and continues to grow.

The Freeview platform is managed by Digital UK Ltd and DTV Services Ltd. The companies have four common shareholders - BBC, ITV, Channel 4 and Arqiva - and Sky is a shareholder in DTV Services Ltd.

Digital UK holds Ofcom licences to provide an Electronic Programme Guide ('EPG') – commonly known to consumers as the TV Guide. Digital UK's listing of logical channel numbers ('LCNs') and its LCN Policy ('the LCN Policy') both conform to the requirements of the Communications Act 2003 and Ofcom's Code of Practice on Electronic Programme Guides (the 'Ofcom EPG Code').

The Digital UK LCN listing is used by Freeview, Freeview Play, BT TV, TalkTalk TV, YouView, EE TV and Now TV.

## 1.2 Freeview Accessible TV Guide

More than two million people in the UK have sight loss<sup>1</sup>, and 11 million have hearing loss<sup>2</sup>.

Digital UK is working to build an accessible version of the Freeview TV Guide, that will work on all Freeview Play devices. To access the Freeview Accessible TV Guide, users will switch their TV to a particular channel number. The Freeview Accessible TV Guide will include these features, as required by the Ofcom EPG Code:

- Text will be rendered to speech, to make it easier for people with visual impairments to use
- Programmes with Subtitles / Audio Description / Signing will be filtered, to make them easier to find
- The size of the text will be increased, to make it easier to read
- The display will have a high contrast ratio

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<sup>1</sup> <https://www.rnib.org.uk/professionals/knowledge-and-research-hub/key-information-and-statistics>

<sup>2</sup> <https://www.actiononhearingloss.org.uk/how-we-help/information-and-resources/publications/research-reports/hearing-matters-report/>

We plan to launch the application in summer 2020.

### 1.3 The consultation

In October 2019, Digital UK published a consultation which sought views on which LCN should be allocated to the Freeview Accessible TV Guide.

Digital UK proposed that we should allocate LCN 555, as this number is both easy to remember, and easy for blind users to find as the 5 button on remote controls has a raised dot which acts as a tactile indicator.

LCN 555 is part of the 'IP delivered services' section at 300-599. This is reserved for the use of IP television platforms (such as YouView) to allocate to channels delivered by IP. We proposed to amend the Digital UK genre ranges to the following:

Genre	First LCN	Last LCN
General Entertainment	1	99
Freeview Information	100	100
HD	101	139
General Entertainment	140	199
Children's	200	229
News	230	249
Text	250	259
Streamed services	260	299
IP delivered services	300 556	554 599
Freeview Accessible TV Guide	555	555
Interactive services	600	609
SD simulcast area	610	669
Adult	670	699
Radio	700	750
Testing area	751	799
Reserved for manufacturer use	800	999

We suggested that, if LCN 555 was not suitable, then we could consider allocating LCN 258, which represents a straight line down on a remote control.

We received six responses from potential users of the Freeview Accessible TV Guide, of whom four favoured 555, one favoured 555 but felt that 258 would also be acceptable, and one favoured 258. We also received responses from: the RNIB, who favoured 555 but felt that 258 would be almost as good; the Digital Accessibility Centre (DAC), who favoured 555; the BBC, who favoured 555; and YouView, who had no strong preference but preferred 258. Sony Pictures Entertainment did not express a preference but had no issue with either 555 or 258. Non-confidential responses have been published on our website at <https://www.freeview.co.uk/corporate/platform-management/consultation-accessible-tv-guide>.

## 1.4 Decision

We have decided to allocate LCN 555 to the Freeview Accessible TV Guide, which had the clear support of the majority of respondents and no major objections from any respondent.

However, IP channels may continue to use LCN 555 until 27 May 2020.

## 2 Digital UK's decision

### 2.1 Options in the consultation

In advance of the consultation, Digital UK sought opinions from potential users of the Freeview Accessible TV Guide, with the help of the Digital Accessibility Centre (DAC), a non-profit social enterprise and one of the leading providers of web accessibility services.

We presented potential users with two options, both of which we considered would be easy for users to find:

- LCN 555 – because the 5 button on a remote control features a raised dot, and
- LCN 258 – because this is a straight line down the centre of a remote control.

In order to allocate LCN 555 or LCN 258 to the Freeview Accessible TV Guide, we would need to amend the LCN Policy. LCN 555 is part of the 'IP delivered services' section at 300-599. LCN 258 is part of the 'Text' section at 250-259.

#### 2.1.1 Option A: LCN 555

In the pre-consultation survey, LCN 555 was the preference amongst potential users canvassed by the DAC – both because it is easy to remember, and because the 5 button on remote controls has a raised dot which acts as a tactile indicator for blind users. For the same reasons, Digital UK proposed that this would be the best LCN to use.

LCN 555 is currently part of the 'IP delivered services' section at 300-599. This is reserved for the use of IP television platforms to allocate to channels delivered solely by IP (i.e. without a DTT element).

YouView provides IP-enabled set-top boxes for BT TV and TalkTalk TV subscribers. Currently, TalkTalk's YouView line-up includes Zee TV at LCN 555. BT does not currently have a service at LCN 555.

We tested how YouView devices would react if we broadcast an HbbTV application at the same LCN as an existing YouView IP-delivered service and uncovered some issues. Both services appear in the listing (i.e. TalkTalk's viewers would see two 555s in the list), and it is not possible to scroll up from one of the services to the other. However, viewers will be able to scroll down, or use the number keys to turn to a different channel.

To fix this issue, either YouView would have to roll out software changes across their devices, or TalkTalk would have to move the incumbent service Zee TV to a different LCN.

#### 2.1.2 Option B: LCN 258

In the pre-consultation survey, potential users canvassed by the DAC generally felt that LCN 258 would be a reasonable alternative to LCN 555. 258 represents a straight line down on a remote control.

LCN 258 is currently part of the 'Text' section at 250-259. This is for "the presentation of on-screen text services which are predominantly used by viewers to seek out specific information". Whilst this definition could apply to the Freeview Accessible TV Guide, the LCN Policy states that if a channel might meet the definition of more than one genre, we should consider the technical nature of a channel (including whether it is streamed) before considering the nature of the content.

Under this option, one less LCN would be available for allocation to future Text services. However, we considered this was unlikely to cause any issues given that no new Text services have launched since 2013, and four have closed since then.

## 2.2 Consultation responses

### 2.2.1 Potential users

We received six responses from potential users of the Freeview Accessible TV Guide, of whom four favoured 555, one favoured 555 but felt that 258 would also be acceptable, and one favoured 258.

Some of their comments were as follows:

- "On behalf of my blind husband 555 would be the preferred /easiest Chanel number."
- "Please use 555, because it is the easier number to remember and to enter."
- "I think 555 is the easiest channel number to use as it saves people having to move their finger around the number pad."
- "I would say the three 5's for the new service would be the easiest to remember and activate. However, should strong objections exist, I believe the alternative of 258, although less memorable, would be satisfactory."
- "I think option B, 258 should be used for the Freeview Accessible TV Guide."

### 2.2.2 Charities and social enterprises

The RNIB is the largest organisation of blind and partially sighted people in the UK. Its response said:

"Whereas RNIB considers both 555 or 258 to be good channel numbers for the new accessible TV guide which one is best for blind and partially sighted people depends on whether YouView or TalkTalk are willing and able to resolve the clash with Zee TV. If they are then once that is done 555 would be the best option. Otherwise 258 would be a very memorable option and would be almost as good."

The Digital Accessibility Centre (DAC) is a non-profit social enterprise and one of the leading providers of web accessibility services. Its response said:

"we believe that 555 would be easier, given the central location of the raised tactile 'dot' or 'line' on the number 5 key. This tactile indicator is of particular importance to blind and low vision users. The number '5' is also more centrally easier to reach

using the thumb, which tends to be used when navigating the remote control unit (RCU)”.

### 2.2.3 Television industry

YouView’s response said:

“We do not have a strong preference as between Option A [555] and Option B [258] but would prefer Option B ... As Digital UK states in the consultation, if LCN 555 was allocated for the Guide, then it is possible that YouView would have to make a software change across its device estate in order to accommodate this change. Given that Option B is a reasonable alternative, which we believe would not require any software changes from YouView, this would be our preference ... However, if Digital UK decided to implement the Guide at 555, we believe that we could accommodate this change in our channel listings. In the event that Digital UK did implement the Guide at LCN 555, this should be implemented on a strictly non-precedential basis with regard to the re-purposing of an IP channel for other services. Particularly as the demand for IP channel services continues...

Whilst we note that LCN 555 was the preference amongst those users canvassed by the DAC, we note that those canvassed also felt that LCN 258 would be a reasonable alternative to LCN 555. So, from an ‘ease of use’ perspective, we believe that this is also easy to remember and can also operate as a suitable tactile indicator for blind users. We appreciate that by pursuing this option, one less LCN would be available for allocation to future Text services, but this is unlikely to cause any issues, given that no new Text services have launched since 2013 and four have closed since then. This is in comparison to the demand for IP channel services which are continuing to grow and therefore resources in this area should, if possible, be maintained for IP channels.”

The BBC’s response said:

“BBC agrees with Digital UK’s recommendation that 555 is the better of the two options presented, and can think of no other suitable and available number for the Freeview Accessible TV Guide. Furthermore, having a channel number like 555 for the Accessible TV Guide should make the service easy to remember and communicate, in much the same way that 888 was for the first analogue teletext subtitles on BBC Ceefax.

Whilst 888 would have seemed the most immediate obvious choice given the number’s legacy in relation to access service provision, we understand that Digital UK are unable to allocate this number in accordance with D-Book provisions.

This all said, we see nothing against certain other alternatives e.g 257 or 456 where the ‘raised dot’ key ‘5’ sits in the middle of a straight vertical or horizontal row of three digits which should assist in both memorability of the LCN and accessibility of the guide.”

Sony Pictures Entertainment did not express a preference but had no issue with either 555 or 258.

## 2.3 Consideration of responses

The clear majority of potential users favoured LCN 555, as did the RNIB, the DAC and the BBC.

Whilst YouView favoured LCN 258, it was not a strong preference, and YouView believed that it could accommodate the change. YouView was concerned that no precedent should be set for any future re-purposing of the IP channel range, and we are happy to confirm that no such precedent would be set.

## 2.4 Decision

We have decided to allocate LCN 555 to the Freeview Accessible TV Guide when it launches in 2020.

This does not set any precedent for any future re-purposing of the IP channel range.

The Digital UK genre ranges are therefore amended to the following:

Genre	First LCN	Last LCN
General Entertainment	1	99
Freeview Information	100	100
HD	101	139
General Entertainment	140	199
Children's	200	229
News	230	249
Text	250	259
Streamed services	260	299
IP delivered services	300	554
	556	599
Freeview Accessible TV Guide	555	555
Interactive services	600	609
SD simulcast area	610	669
Adult	670	699
Radio	700	750
Testing area	751	799
Reserved for manufacturer use	800	999

However, IP channels may continue to use LCN 555 until 27 May 2020.