

Consultation on revised rules on the allocation of LCNs to public service channels

Response by TG4

TG4 welcomes the opportunity to submit its response to this consultation.

Background

Under the Belfast (Good Friday) Agreement (1998) it was agreed that TG4 would be made available as widely as possible throughout Northern Ireland. This was then reinforced in the Memorandum of Understanding between the UK and Irish Governments on DTT (2010) which agreed that TG4 should be made as widely available as possible terrestrially in Northern Ireland. To this end, TG4 is carried on Freeview with its carriage costs funded by way of an annual DCMS Grant.

TG4 is, therefore, analogous to S4C in Wales and BBC ALBA in Scotland. It is an indigenous language PSB service and, given its cultural importance, TG4's carriage on Freeview is funded by DCMS Grant. TG4 also meets the regulatory criteria to be the eligible Irish language broadcaster-partner in the UK Young Audiences Content Fund administered by the British Film Institute. In view of this, we would argue TG4 should be bestowed the same level of prominence on Freeview in Northern Ireland as the indigenous language channels in Wales and Scotland.

We note Ofcom's position as set out in the document "*Review of prominence for public service broadcasting - Statement on changes to the EPG Code*". PSB services must be prominent and easily accessible. The document also stipulates that BBC ALBA must be accommodated within the first 24 EPG slots in Scotland, and S4C & Channel 4 in Wales must be placed within the first eight slots. It is, therefore, reasonable to argue that TG4 should be treated similarly in Northern Ireland.

From an examination of the Freeview EPGs in Wales, Scotland and Northern Ireland, position 8 is occupied in Wales and Scotland but is vacant in Northern Ireland. TG4 is asking to be moved to position 8 on the Freeview EPG in Northern Ireland to reflect its Public Service character in line with the other PSBs.

Consultation Questions

5.3 Do you agree with Digital UK's proposed amendments to Section 5.1 of the LCN Policy?

Subject to TG4's position as outlined above, the approach suggested by Digital UK is reasonable. It would make sense, therefore, to move TG4 to position 8 on the EPG in Northern Ireland. This would have no impact on the EPGs in Wales or Scotland as position 8 is already occupied.

4.4 Do you agree with Digital UK's proposed method and implementation plans for creating a slot for BBC Four in the first 24 LCNs?

As Digital UK must find a slot for BBC Four within the first 24 slots on the EPG in Scotland, the approach set out seems reasonable. It is also sensible to try to have a high level of

consistency across the EPGs in each UK region. To this end, it would also be consistent to locate the indigenous language service in Northern Ireland (TG4) in a position of similar prominence to that enjoyed by S4C in Wales and BBC ALBA in Scotland. In addition, moving TG4 to a currently vacant LCN will not adversely impact on the prominence of existing services.

We note Digital UK's intention to provide support to viewers who need help arising from this change. This is welcomed by TG4. It is also sensible to implement all changes in November prior to the Christmas break.

27th July 2020