

DUK LCN Consultation response – 13th January 2021

Background

MediaPaedia Broadcast (“MPB”) is media consultancy and a broadcast operations specialist. We work with a number of channels that are carried on the Freeview platform, providing day-to-day operational services. MPB has also been involved in a number of capacity sales on the DTT platform and has worked with most of the major UK channels over the past five years.

Response

1. Do you agree with Digital UK’s proposed amendments to the LCN Policy, to enable HD/SD substitution for devices that support CLM?
 - A. Yes
2. Do you agree with Digital UK’s proposed amendments to the LCN Policy, to enable IP fallback channels for devices that support CLM?
 - A. Yes
3. Do you agree with Digital UK’s proposed amendments to the LCN Policy, to enable IP-delivered channels for devices that support CLM?
 - A. Yes
4. Do you agree with Digital UK’s proposed amendments to the LCN Policy, to remove restrictions on the number of times channel providers may reorder their LCNs or change the names of their channels?
 - A. Yes, subject to Ofcom approval of name changes.
5. Do you agree with Digital UK’s proposed amendments to the LCN Policy, to remove rules that prohibit LCN trading between channel providers?
 - A. Yes. Having been active in the initial stages of ‘EPG trading’ on the Sky platform, it became apparent that, whilst Sky did not like the trading of EPGs, there are always ways around the rules that are in place, for those determined to move. By opening the trading of positions up, with a specific set of rules and guidelines for people to work to, the market will find its own balance point. Trading of positions on Sky has led to a more balanced EPG and, arguably, better experience for viewers and we believe this will be the case on the Freeview platform as well.
6. Do you agree with Digital UK’s proposed amendments to the LCN Policy, to increase the minimum broadcast hour requirement for new channels?
 - A. Partly. The two-hour rule has allowed channel owners to ‘park’ LCN’s by placing 2-hours of content on the channel, overnight, with no real intention of the channel ever being a commercially viable prospect, for the period it is ‘parked’. This is not particularly good for the viewer, however is understandable from a broadcaster perspective, as there are times when an opportunity to launch must be taken, on Freeview, prior to the broadcaster actually being ready to launch, specifically due to the scarcity of capacity. Should a broadcaster be allowed a period of time that they could, effectively, ‘hold’ an LCN, without broadcasting on it, to allow for the vagaries of timings around channel launches, then we see no issue with the increase in hours. Should a channel not be able to do this then we would want the two-hour rule to remain.