

Additional information provided in support of the BBC's response to Ofcom's consultation 'Review of rules for prominence of PSB and local TV'

This note details supplementary evidence provided by the BBC in response to Ofcom's consultation and BBC Four.

BBC Four

For the avoidance of doubt, we agree with Ofcom that "the current level of prominence [granted to BBC Four] is appropriate"¹. We agree with proposals that BBC Four should be guaranteed a slot within the top three pages, as long as this is taken to be a minimum requirement and does not result in BBC Four losing prominence as a result of EPG re-ordering.

This is a concern because there are several platforms where BBC Four is currently in a more prominent position than the top three pages. We believe it would be a perverse outcome if the proposed updates to the linear EPG code – designed to preserve PSB benefits – resulted in a situation where a current PSB channel, BBC Four, was moved to a less prominent position by platforms adopting a 'minimum compliance' approach. We urge Ofcom to guard against this outcome in its statement and below we set out further evidence of the importance of EPG position and the current contribution of BBC Four to the PSB ecosystem.

As with all the BBC's Public Service channels – their prominence on the EPG and therefore discoverability with all audiences helps maximise the BBC's ability to deliver its public service remit. BBC Four's unique mix of culture, arts, music (including live performance), history and science originations with editorial depth, expertise and originality is unlike that of any commercial channel – PSB or otherwise. Similarly, BBC Four is the current home of a broad mix of international programming ranging across factual, drama and film. The appeal of this programming is reflected in BBC Four's reach and share, which is comparable to other digital generalist channels - on several occasions programmes on BBC Four have reached more than 1m viewers, showing that it is a channel of scale.²

This appeal of BBC Four – and the impact its EPG position has on viewing - becomes clear when comparing BBC Four's performance across different platforms. For example, BBC Four and Dave have different levels of prominence on Virgin Media and Sky EPGs (BBC Four is 20 slots higher than Dave on Virgin, and 6 slots lower than Dave on Sky) and this is reflected in the channels' share on each platform.

¹ Paragraph 5.35 Ofcom, 'Review of the rules for prominence of public service broadcaster and local TV', July 2018.

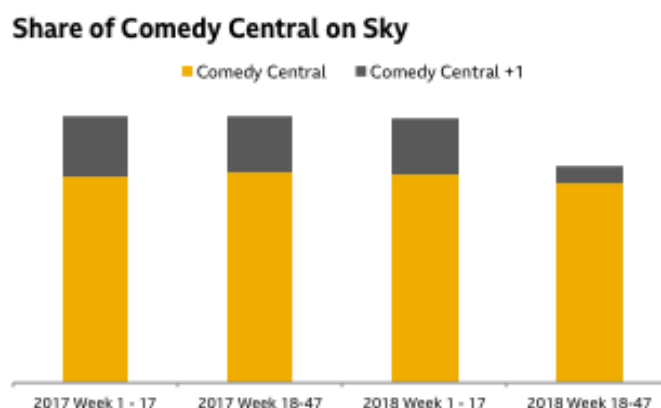
² BARB (2018), BARB (2017).

		All platforms Share	Sky Share	Virgin Share
All hours	BBC Four	0.92	0.49	0.89
	Dave	1.08	0.96	0.76
Peak	BBC Four	1.36	0.69	1.24
	Dave	0.86	0.81	0.62

Table 1: BBC Four and Dave performance on Virgin & Sky platforms

While there will be many other factors that affect the performance of any given channel (e.g. programmes & content mix, talent, marketing etc), we believe that EPG prominence is a necessary condition for performance – without a strong EPG position, no matter how strong the content offer is, audiences may struggle to find it. Indeed, there is a wealth of statistical evidence to show that better EPG positions result in improved channel performance and demotions have a negative impact.³

This is also true of general interest and ‘specialist’ channels alike. The most recent illustration of this is the demotion of the ‘+1’ group of channels. Comedy Central+1 experienced a 72% year-on-year reduction in share following the Sky EPG reshuffle on the 1st May. The impact is most noticeable in terms of the contribution of Comedy Central viewing from the main channel and the +1:



(Source: Barb YoY 2018 vs 2017 comparing periods from May 1st to November 26th).

³ EPG moves between 2010 and 2016 point to a 1-2% change in viewing per EPG slot. (Source: Expert Media Partners for the BBC). Cf. [FEH Media Insight](#) for Ofcom, 2013.

While we believe BBC Four's broad mix and scale means it is more akin to mainstream multi-genre channels than a niche or special interest channel, we also note that there is no evidence that audiences will continue to search out a specialist channel if an EPG move reduces its general visibility.

So we have no doubt that any shift in EPG position would adversely affect BBC Four's performance (or indeed any PSB channel) and making the content it shows harder to find would weaken such a channel's contribution to the UK's PSB television landscape. Any downward shift in a digital channel's EPG position will reduce viewing, but there are further challenges in BBC Four's case:

- Firstly, in order to achieve its distinctive and singular programming mix, BBC Four avoids commissioning or acquiring long-running strands or series. This means that it offers far fewer habitual destination points in its schedule that would drive audiences to search out the channel.
- Secondly, BBC Four's audience profile is slightly older than the BBC average. Internal BBC research shows that older audiences are more likely to use the EPG as a way of finding something to watch, and a downgrade of BBC Four from the first page of the EPG would have particular impact with those audiences.⁴

We therefore believe that maintaining the BBC's PSB channel positions (including BBC Four) on all platform EPGs is key - alongside the guarantee of a slot for BBC Four within the first three pages of the general entertainment section for those platforms which would not otherwise have BBC Four listed at this level of prominence.

⁴ BBC 'routes to content' research 2016