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## Local TV licensing

Consultation on provisional decision not to advertise or re-advertise certain local TV licences

### **CONSULTATION:**

Publication Date: 20 April 2018

Closing Date for Responses: 1 June 2018

## About this document

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This document sets out Ofcom's provisional decision not to advertise or re-advertise licences in 13 specific areas, or their substitutes, identified for the roll-out of local TV services but where no licence has been awarded to date.

This will release Comux, the operator of the transmission infrastructure for local TV, from its current obligation to build the transmission infrastructure in these locations.

We consider that continuing to require the extension of the local TV transmission network to these locations or substitute areas as previously planned, would have an adverse impact on the economic viability of the local TV sector as a whole. The document explains in detail the full reasoning behind our provisional decision.

We invite interested or affected parties to comment on Ofcom's provisional decision by 1 June 2018.

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# 1. Introduction

- 1.1 Local TV services were first licensed by Ofcom in 2013, and there are now local TV services licensed to broadcast in 34 different locations across the UK.
- 1.2 The local TV broadcast licences (“L-DTPS licences”) that we have granted to date followed the decisions we set out in Ofcom’s “Local TV Statement”,<sup>1</sup> which we published in May 2012. This set out how we would exercise our powers and duties to implement the roll-out of local TV, including how we would license a single new local TV multiplex to carry all of the individual local TV services. We said that the services would be rolled out in two phases. In Phase 1, we said that the local multiplex licensee should develop the necessary infrastructure to carry a minimum of 21 local TV services in locations that Ofcom had identified as suitable for local TV services. In Phase 2, the multiplex licensee would be required to build out to the additional locations it had itself proposed in its multiplex licence application.<sup>2</sup>
- 1.3 There are currently 13 locations which were intended to be part of the phased roll-out of local TV, but for which (for various reasons) no local TV licence has been awarded. We have considered whether we should advertise or re-advertise local TV licences in these areas, or substitute them with licences for nearby areas, to complete the process anticipated in the Local TV Statement. We are minded not to do so for the reasons we set out in this document. Before taking a final decision, we are providing stakeholders with an opportunity to comment on our proposal, in particular to identify any matter(s) that they consider we should take into account which we have not covered in this consultation.
- 1.4 In the rest of this section, we set out by way of background:
- the obligations that we have imposed on the local multiplex licensee, Comux, and on the local TV licensees to secure the provision and availability of local TV services;
  - the funding structure of Comux and local TV services;
  - how the licensing of local TV services has developed in practice since the Local TV Statement was published in 2012.

## Relevant licence obligations of the local multiplex licensee and local TV licensees

- 1.5 Ofcom awarded the local multiplex licence to Comux in 2013. In its licence application, Comux set out its commitment *“to build a transmission network based on Ofcom’s Coverage Note dated 10 May 2012 for all 21 Phase 1 sites. We also confirm that we will*

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<sup>1</sup> “Local TV Statement”: Licensing Local Television. How Ofcom will exercise its new powers and duties to license new local television services. 10 May 2012, available here:

[https://www.ofcom.org.uk/\\_\\_data/assets/pdf\\_file/0020/54236/local-tv-statement.pdf](https://www.ofcom.org.uk/__data/assets/pdf_file/0020/54236/local-tv-statement.pdf)

<sup>2</sup> “Local TV Statement”: Licensing Local Television. How Ofcom will exercise its new powers and duties to license new local television services. 10 May 2012, available here:

[https://www.ofcom.org.uk/\\_\\_data/assets/pdf\\_file/0020/54236/local-tv-statement.pdf.paragraph.1.18](https://www.ofcom.org.uk/__data/assets/pdf_file/0020/54236/local-tv-statement.pdf.paragraph.1.18).

*expand to all of the 28 Phase 2 locations, subject to local TV companies obtaining licences to broadcast at those locations.”*<sup>3</sup> This commitment is incorporated into the conditions in Comux’s multiplex licence, which require Comux to “*establish, operate and maintain a transmission network for the multiplex broadcast of the local television services*” at the relevant locations. Comux is also required by the conditions of its licence to make licensed local TV services available through reserved capacity on its multiplex, and there is an equivalent obligation on L-DTPS licence holders to make their services available to the local multiplex.

- 1.6 When Ofcom published the Local TV Statement, the general indications were that there would be competition to provide local TV services at the locations that had been identified. However, we recognised the possibility that we might not receive applications for all advertised local TV locations, and that some applications might not satisfactorily address the statutory criteria for a licence award. Therefore, we said that we would advertise licences for all locations proposed by the multiplex licensee, and that where we had advertised a licence but not made an award, e.g. because there were no applicants, we would re-advertise it. We also said that, in the event that no L-DTPS licence was awarded, we may instead seek to advertise a licence for the nearest equivalent-sized location that Ofcom could make available in its place.<sup>4</sup>

## **Funding arrangements for local TV transmission network and local TV services**

- 1.7 As part of the government’s local TV policy, funding from the BBC was made available to fund the building of the local television transmitter infrastructure. This funding has been used by Comux to build the transmission infrastructure required for the carriage of the 34 local TV services that were awarded licences by Ofcom between 2013 and 2015.<sup>5</sup> The BBC funding for the local TV infrastructure came to an end on 31 July 2017. Consequently, the costs of building any further infrastructure will have to be funded by other means.
- 1.8 In addition, there are the ongoing operational costs of running the multiplex, which Comux passes on to the local TV licensees. Comux is in fact owned by the collective of L-DTPS licensees, and profits it makes are distributed to them to offset the operational costs of the network that the licensees would otherwise have to meet.

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<sup>3</sup> This was specified on page 8 of the Application from Comux for the licence, available here: [http://webarchive.nationalarchives.gov.uk/20160702162827/http://licensing.ofcom.org.uk/binaries/tv/local-tv/mux-applicants/Comux\\_UK\\_Ltd\\_.pdf](http://webarchive.nationalarchives.gov.uk/20160702162827/http://licensing.ofcom.org.uk/binaries/tv/local-tv/mux-applicants/Comux_UK_Ltd_.pdf)

<sup>4</sup> “Local TV Statement”: Licensing Local Television. How Ofcom will exercise its new powers and duties to license new local television services. 10 May 2012, available here: [https://www.ofcom.org.uk/\\_\\_data/assets/pdf\\_file/0020/54236/local-tv-statement.pdf](https://www.ofcom.org.uk/__data/assets/pdf_file/0020/54236/local-tv-statement.pdf), paragraph 2.62 and 3.37.

<sup>5</sup> The last of these locations started broadcasting on 31 July 2017.

- 1.9 As shown in the Communications Market Report 2017<sup>6</sup>, local television services have been funded primarily through a mix of advertising, BBC funding (primarily protected funding through BBC purchase of local news items), other commercial and non-commercial income, and teleshopping. The protected BBC funding was intended to provide the new local television services with some funding certainty in their initial start-up phase.<sup>7</sup> However, as the services mature, they need to secure alternative sources of revenue to become self-sustaining.
- 1.10 As noted in paragraph 1.8, one source of income for the local TV services is ‘rebates’ from Comux itself, to the extent it is able to generate profits. The analysis of financial information about the sector in our Communications Market Report 2017 demonstrates that the sector as a whole still faces challenges in diversifying income sources; figures continue to show an overall net debt, notwithstanding some improvement in performance.

## Advertising and grant of local TV licences

- 1.11 The first local TV licences to be advertised were for each of the following 21 locations: Belfast, Birmingham, Brighton & Hove, Bristol, Cardiff, Edinburgh, Glasgow, Grimsby, Leeds, Liverpool, London, Manchester, Newcastle, Norwich, Nottingham, Oxford, Plymouth, Preston, Sheffield, Southampton and Swansea. All of these licences were awarded apart from the one for Plymouth (for which there were no applicants), and by 24 August 2015 all of the 20 licensed services had launched, with Comux taking responsibility for building the necessary transmitter infrastructure for each locality.
- 1.12 Licences for each of the Phase 2 locations which Comux had identified in its application, and to which it was therefore required to extend its transmission network once a local TV licence had been granted, were advertised in three rounds during 2013 and 2014. From the list of Phase 2 locations, we advertised a licence but did not make an award in respect of nine locations (Bangor, Barnstaple, Forth Valley, Gloucester, Inverness, Limavady, Derry/Londonderry, Luton and Stoke-on-Trent).
- 1.13 By the end of 2014, this left three locations from the Phase 2 list still to be advertised: Kidderminster, Bromsgrove and Stratford Upon Avon.
- 1.14 In 2014, Ofcom decided to make part of the spectrum used to broadcast digital television, including local TV, available for mobile data use<sup>8</sup>. Until this exercise was complete, the future coverage of local services could not be accurately predicted with confidence, and therefore we put on hold any further advertisements of local TV licences.
- 1.15 We have now reached a point where the planning for 700 MHz clearance is almost complete, and we have a much better understanding of how the economic models of both

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<sup>6</sup> <https://www.ofcom.org.uk/research-and-data/multi-sector-research/cmr/cmr-2017/uk>

<sup>7</sup>

[http://downloads.bbc.co.uk/aboutthebbc/insidethebbc/howwework/reports/pdf/bbc\\_local\\_content\\_acquisition\\_january2017.pdf](http://downloads.bbc.co.uk/aboutthebbc/insidethebbc/howwework/reports/pdf/bbc_local_content_acquisition_january2017.pdf)

<sup>8</sup> See *Decision to make the 700 MHz band available for mobile data -statement*.

[https://www.ofcom.org.uk/\\_data/assets/pdf\\_file/0024/46923/700-mhz-statement.pdf](https://www.ofcom.org.uk/_data/assets/pdf_file/0024/46923/700-mhz-statement.pdf)

Comux and the local TV services themselves are working in practice. We have therefore considered whether our original intention (as stated in our Local TV Statement in 2012) to advertise, re-advertise or substitute licences that have not been advertised or awarded is still appropriate.

- 1.16 For the reasons set out in Section 2, we are minded not to advertise licences for these locations or any substitute locations. We have reached this provisional view by applying the same tests we used in 2012 (including the impact on citizens and consumers) for the selection of suitable locations for local TV services, and taking into account the information we have obtained about the operation of the local TV sector and its viability.
- 1.17 We set out the basis for our provisional decision in the next section.

## 2. Assessment and provisional decision

- 2.1 When Ofcom selected the locations for Phase 1 and Phase 2 of the roll-out of local TV in 2012<sup>9</sup>, we applied the following criteria: technical feasibility; evidence of local demand and size/economic viability.<sup>10</sup> We have applied the same criteria now to assess whether to advertise, re-advertise or substitute licences for the 13 locations where licence awards have yet to be made, using data we have gathered since the launch of local TV services to inform our assessment.
- 2.2 The criteria involve consideration of the following elements:
- For technical feasibility, we have considered the household coverage provided by spectrum potentially available in the relevant area.
  - For evidence of local demand, we have considered the current level of interest from potential applicants.
  - For economic viability, we have considered two aspects:
    - The likely economic viability of a service at each individual location;
    - The impact of licensing these new local TV services on the economic viability of the local TV multiplex licence holder Comux and of the existing local TV licensees.
- 2.3 We have made our assessment in light of our statutory duties, including:
- our principal duty to further the interests of citizens in relation to communications matters and the interests of consumers in relevant matters, where appropriate by promoting competition in section 3 of the Communications Act 2003;
  - our duties under section 3 of the Wireless Telegraphy Act 2006 when carrying out our spectrum functions to have regard to demand for spectrum and the desirability of promoting the efficient management and use of spectrum.
- 2.4 As set out in more detail below, our assessment reveals that in the majority of the 13 locations there is likely to be suitable spectrum available and there is some evidence of interest from potential applicants. However, we consider that local TV services in only five of the locations in question have a reasonable chance of being economically viable, taking account of their estimated household coverage and the low proportion of licence awards we have been able to make for areas covering 50,000 households or fewer. Furthermore, based on our understanding of the capital expenditure required and Comux's operating costs, we consider that the costs of extending the transmission network to any of the

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<sup>9</sup> As noted earlier, the Phase 1 locations were a baseline that anyone applying for the multiplex licence was expected to build. Applicants could choose which Phase 2 locations they would commit to building; Comux committed to all of them.

<sup>10</sup>

“Local TV Statement”: Licensing Local Television. How Ofcom will exercise its new powers and duties to license new local television services. 10 May 2012, available here:

[https://www.ofcom.org.uk/\\_\\_data/assets/pdf\\_file/0020/54236/local-tv-statement.pdf](https://www.ofcom.org.uk/__data/assets/pdf_file/0020/54236/local-tv-statement.pdf). The criteria for selecting phase 1 locations are set out here: paragraph 3.5 (technical feasibility), 3.10 and 3.15 (economic viability for the multiplex) and 3.14 and 3.16 (local interest and size/economic viability of individual locations). Similar criteria were used for selecting phase 2 locations, as set out in paragraph 3.35 (technical feasibility, local demand and economic viability).



locations, or any substitute locations, would put at risk the viability of the local TV sector as a whole.

## Technical feasibility

- 2.5 We have assessed the household coverage provided by spectrum potentially available in each of the three locations for which licences have not been advertised to date (Kidderminster, Bromsgrove, Stratford upon Avon).
- 2.6 We have not re-assessed spectrum availability and potential household coverage for each of the other locations, and so we have used the coverage figures which we modelled for these locations prior to the 700 MHz planning as the best available proxy. This is set out in Table 1. We recognise that in some of the locations, the coverage is likely to have reduced as a result of that planning.

**Table 1: Household coverage for locations for which licences have not been awarded<sup>11</sup> – based on 2012 or 2017 computer modelling**

Location	Most recent estimate
Bangor	16,000 or fewer (based on 2012 computer modelling)
Kidderminster	Around 18,000 (based on 2017 computer modelling)
Bromsgrove	Around 23,000 (based on 2017 computer modelling)
Stratford Upon Avon	Around 34,000 (based on 2017 computer modelling)
Barnstaple	32,000 or fewer (based on 2012 computer modelling)
Limavady	35,000 or fewer (based on 2012 computer modelling)
Derry-Londonderry	36,000 or fewer (based on 2012 computer modelling)
Inverness	49,000 or fewer (based on 2012 computer modelling)
Luton (Bedford+Luton)	82,000 or fewer (based on 2012 computer modelling)
Plymouth	100,000 or fewer (based on 2012 computer modelling)
Stoke on Trent	100,000 or fewer (based on 2012 computer modelling)
Gloucester (Gloucester +	220,000 or fewer (based on 2012 computer modelling)

<sup>11</sup> Some locations were merged following an Ofcom consultation process. They are indicated in brackets in the table.

Malvern + Hereford)	
Forth Valley	380,000 or fewer (based on 2012 computer modelling)

## Local demand

- 2.7 In Table 2, we set out the evidence of demand we have received from prospective operators of local TV services, based on unprompted expressions of interest. This shows that there are three locations where we have received no evidence of local demand, and another four where no expression of interest has been received since 2015.

**Table 2: summary of expressions of interest**

Location	At the time of advertisement	Most recent expression of interest
Bangor	Yes	2014
Kidderminster	N/A	2016
Bromsgrove	N/A	2016
Stratford Upon Avon	N/A	2016
Barnstaple	None	None
Limavady	None	None
Derry-Londonderry	None	2017
Inverness	Yes	None
Luton (Bedford+Luton)	None	2015
Plymouth	None	2015
Stoke on Trent	Yes	2016
Gloucester (Gloucester + Malvern + Hereford)	None	2014
Forth Valley	None	2017

## Economic viability

2.8 We consider that only five of the locations where there is evidence of local demand would be economically viable, based on our assessment of household coverage in 2012: Luton, Plymouth, Stoke on Trent, Gloucester and Forth Valley.<sup>12</sup> To assess economic viability we have considered whether, based on what we know about areas of an equivalent population size, we would expect anyone to apply for the licence, or if they did apply whether we would expect to be able to award the licence on the basis of a realistic business plan.<sup>13</sup> To summarise our findings to date:

- Most licences for locations with a household coverage of under 50, 000 have not managed to attract viable applications.<sup>14</sup>
- Most licences for locations with a household coverage between 50,000 and 100,000 have been awarded, and services have launched.<sup>15</sup>
- The vast majority of licences for locations with coverage of over 100,000 households have been awarded, and services have launched.<sup>16</sup>

2.9 However, when the costs to Comux of extending the transmission network are taken into account, we consider that licensing these 13 additional local TV services would have an adverse impact on the local TV sector as a whole.

2.10 This is because the capital expenditure required to build the new transmitter infrastructure for these locations will no longer be covered by any BBC funding. Further, because these locations are in general fairly small in terms of their household coverage, the incremental revenues Comux would be able to generate from these transmitters would be smaller than the sum of the incremental operating costs and the capital expenditure associated with them. Accordingly, our analysis is that the net impact of awarding licences for the remaining 13 locations (or suitable equivalents) would have a significant negative financial impact on Comux<sup>17</sup>.

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<sup>12</sup> As noted at paragraph 2.6 above, it is possible that household coverage in these areas provided by the available spectrum is now lower than the levels modelled in 2012 as a result of the 700MHz replanning.

<sup>13</sup> Given that the sector is quite new, it is too early to draw conclusions about economic viability of local TV areas in a broader sense i.e. by looking at the longer-term ability of individual services to generate profits over the period of the licence. We have however produced a sector-wide overview of developments to date, see our Communications Market Report 2017: <https://www.ofcom.org.uk/research-and-data/multi-sector-research/cmr/cmr-2017/uk>

<sup>14</sup> Three locations did not attract applications (Barnstaple, Limavady and Derry-Londonderry), 2 were not awarded because of Ofcom concerns about the sustainability of the business models proposed (Bangor and Inverness), and 3 were awarded (Mold, Salisbury and Scarborough).

<sup>15</sup> Three locations did not attract applications (Luton, Plymouth, Stoke on Trent) and 7 locations of this type of size have been awarded (Brighton, Basingstoke, Cambridge, Carlisle, Guildford, Oxford and Swansea). It is worth noting that for four of these locations, the licensees requested subsequent increases in coverage (Basingstoke, Cambridge, Oxford and Swansea).

<sup>16</sup> Two locations in this group did not attract applications (Gloucester and Forth Valley) and 1 location was not awarded. The remaining 24 locations in this group were awarded.

<sup>17</sup> Our analysis is based on commercially confidential financial information provided to Ofcom by Comux (management Accounts for the 12 months ended 30 September 2016; national video stream revenue per household and estimates of the annual incremental costs and the annual incremental income for each of the 13 locations).

- 2.11 The financial impact of launching additional services would not be limited to Comux. It could also be expected to impact the rest of the local TV sector more generally. Currently, the amounts local TV licensees pay to Comux for transmission and network services may be reduced by the distribution of profits which Comux generates. We consider that the costs to Comux of extending the network to further locations would reduce the likelihood that this could continue and, as a result, the effective cost of transmission to existing individual local TV licensees would rise. Given the financial challenges already faced by the sector<sup>18</sup>, this could put the sustainability of the services that are already broadcasting further at risk.
- 2.12 We do not think that the potential consumer and citizen benefits to be secured from licensing new local TV services in the identified locations outweigh the risk that licensing any such services is likely to have a significantly adverse financial impact on the existing local TV sector, which in turn may result in consumer and citizen harm from a possible reduction in programming range and quality, or the closure of some services.
- 2.13 Finally, it should be noted that we have assessed the financial impact on Comux by reference to Comux's licence obligation to extend its network to all the remaining Phase 1 locations and the Phase 2 locations identified in its application (or suitable alternatives), rather than by individual location. For the reasons set out, we are proposing to release Comux from this obligation in relation to the 13 locations where an award has not been made and not to pro-actively advertise or re-advertise local TV licences in these areas. Nonetheless, it remains open to potential licensees to ask Ofcom to advertise a licence in a new location, and to existing licensees wishing to extend their coverage areas to make a joint application with Comux for an extension, where they consider that there is scope for an economically viable service which would not adversely impact the wider local TV sector. Such proposals will be considered on their merits, in the light of our assessment criteria and our statutory duties.

## Provisional decision and invitation to comment

- 2.14 Accordingly, in light of the considerations we have set out above, we are minded:
- not to advertise or re-advertise local TV licences for the 13 locations where awards have yet to be made, or for substitute locations; and
  - to release Comux from its obligation to roll out its transmission network to the Phase 2 locations identified in its application.
- 2.15 Respondents are invited to comment on whether they agree with this proposal. If there is any matter that respondents consider Ofcom should take into account before reaching a final decision, this should be identified and a brief explanation as to why it might outweigh the factors we have set out in this document should be provided.

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<sup>18</sup> Set out in Ofcom's report *The Communications Market 2016, 2. Television and Audio Visual*, page 80 to 86, available online: [https://www.ofcom.org.uk/\\_data/assets/pdf\\_file/0026/17495/uk\\_tv.pdf](https://www.ofcom.org.uk/_data/assets/pdf_file/0026/17495/uk_tv.pdf) and in *The Communications Market 2017, Television and Audio Visual Content*, page 66 to 76. Available online: [https://www.ofcom.org.uk/\\_data/assets/pdf\\_file/0016/105442/uk-television-audio-visual.pdf](https://www.ofcom.org.uk/_data/assets/pdf_file/0016/105442/uk-television-audio-visual.pdf)

# A1. Responding to this consultation

## How to respond

- A1.1 Ofcom would like to receive views and comments on the issues raised in this document, by 5pm on 1 June 2018.
- A1.2 You can download a response form from <https://www.ofcom.org.uk/consultations-and-statements/category-2/local-tv-licensing>. You can return this by email or post to the address provided in the response form.
- A1.3 If your response is a large file, or has supporting charts, tables or other data, please email it to LocalTV@ofcom.org.uk, as an attachment in Microsoft Word format, together with the cover sheet (<https://www.ofcom.org.uk/consultations-and-statements/consultation-response-coversheet>). This email address is for this consultation only, and will not be valid after June 2018.
- A1.4 Responses may alternatively be posted to the address below, marked with the title of the consultation:
- Leen Petré  
Ofcom  
Riverside House  
2A Southwark Bridge Road  
London SE1 9HA
- A1.5 We welcome responses in formats other than print, for example an audio recording or a British Sign Language video. To respond in BSL:
- Send us a recording of you signing your response. This should be no longer than 5 minutes. Suitable file formats are DVDs, wmv or QuickTime files. Or
  - Upload a video of you signing your response directly to YouTube (or another hosting site) and send us the link.
- A1.6 We will publish a transcript of any audio or video responses we receive (unless your response is confidential)
- A1.7 We do not need a paper copy of your response as well as an electronic version. We will acknowledge receipt if your response is submitted via the online web form, but not otherwise.
- A1.8 You do not have to answer all the questions in the consultation if you do not have a view; a short response on just one point is fine. We also welcome joint responses.
- A1.9 It would be helpful if your response could include direct answers to the questions asked in the consultation document. The questions are listed at Paragraphs 2.14 and 2.15. It would also help if you could explain why you hold your views, and what you think the effect of Ofcom's proposals would be.

- A1.10 If you want to discuss the issues and questions raised in this consultation, please contact Leen Petré on 020 73914939, or by email to [LocalTV@ofcom.org.uk](mailto:LocalTV@ofcom.org.uk).

## Confidentiality

- A1.11 Consultations are more effective if we publish the responses before the consultation period closes. In particular, this can help people and organisations with limited resources or familiarity with the issues to respond in a more informed way. So, in the interests of transparency and good regulatory practice, and because we believe it is important that everyone who is interested in an issue can see other respondents' views, we usually publish all responses on our website, [www.ofcom.org.uk](http://www.ofcom.org.uk), as soon as we receive them.
- A1.12 If you think your response should be kept confidential, please specify which part(s) this applies to, and explain why. Please send any confidential sections as a separate annex. If you want your name, address, other contact details or job title to remain confidential, please provide them only in the cover sheet, so that we don't have to edit your response.
- A1.13 If someone asks us to keep part or all of a response confidential, we will treat this request seriously and try to respect it. But sometimes we will need to publish all responses, including those that are marked as confidential, in order to meet legal obligations.
- A1.14 Please also note that copyright and all other intellectual property in responses will be assumed to be licensed to Ofcom to use. Ofcom's intellectual property rights are explained further at <https://www.ofcom.org.uk/about-ofcom/website/terms-of-use>.

## Next steps

- A1.15 Following this consultation period, Ofcom plans to publish a statement as soon as practicable thereafter.
- A1.16 If you wish, you can register to receive mail updates alerting you to new Ofcom publications; for more details please see <https://www.ofcom.org.uk/about-ofcom/latest/email-updates>

## Ofcom's consultation processes

- A1.17 Ofcom aims to make responding to a consultation as easy as possible. For more information, please see our consultation principles in Annex 2.
- A1.18 If you have any comments or suggestions on how we manage our consultations, please email us at [consult@ofcom.org.uk](mailto:consult@ofcom.org.uk). We particularly welcome ideas on how Ofcom could more effectively seek the views of groups or individuals, such as small businesses and residential consumers, who are less likely to give their opinions through a formal consultation.
- A1.19 If you would like to discuss these issues, or Ofcom's consultation processes more generally, please contact Steve Gettings, Ofcom's consultation champion:

**Local TV licensing**

Steve Gettings  
Ofcom  
Riverside House  
2a Southwark Bridge Road  
London SE1 9HA  
Email: [corporationsecretary@ofcom.org.uk](mailto:corporationsecretary@ofcom.org.uk)

## A2. Ofcom's consultation principles

### **Ofcom has seven principles that it follows for every public written consultation:**

#### **Before the consultation**

- A2.1 Wherever possible, we will hold informal talks with people and organisations before announcing a big consultation, to find out whether we are thinking along the right lines. If we do not have enough time to do this, we will hold an open meeting to explain our proposals, shortly after announcing the consultation.

#### **During the consultation**

- A2.2 We will be clear about whom we are consulting, why, on what questions and for how long.
- A2.3 We will make the consultation document as short and simple as possible, with a summary of no more than two pages. We will try to make it as easy as possible for people to give us a written response. If the consultation is complicated, we may provide a short Plain English / Cymraeg Clir guide, to help smaller organisations or individuals who would not otherwise be able to spare the time to share their views.
- A2.4 We will consult for up to ten weeks, depending on the potential impact of our proposals.
- A2.5 A person within Ofcom will be in charge of making sure we follow our own guidelines and aim to reach the largest possible number of people and organisations who may be interested in the outcome of our decisions. Ofcom's Consultation Champion is the main person to contact if you have views on the way we run our consultations.
- A2.6 If we are not able to follow any of these seven principles, we will explain why.

#### **After the consultation**

- A2.7 We think it is important that everyone who is interested in an issue can see other people's views, so we usually publish all the responses on our website as soon as we receive them. After the consultation we will make our decisions and publish a statement explaining what we are going to do, and why, showing how respondents' views helped to shape these decisions.



## A3. Consultation coversheet

### BASIC DETAILS

Consultation title:      organisation realise

To (Ofcom contact):

Name of respondent:

Representing (self or organisation/s):

Address (if not received by email):

### CONFIDENTIALITY

Please tick below what part of your response you consider is confidential, giving your reasons why

Nothing ☐

Name/contact details/job title ☐

Whole response ☐

Organisation ☐

Part of the response ☐

If there is no separate annex, which parts? \_\_\_\_\_

\_\_\_\_\_

If you want part of your response, your name or your organisation not to be published, can Ofcom still publish a reference to the contents of your response (including, for any confidential parts, a general summary that does not disclose the specific information or enable you to be identified)?

### DECLARATION

I confirm that the correspondence supplied with this cover sheet is a formal consultation response that Ofcom can publish. However, in supplying this response, I understand that Ofcom may need to publish all responses, including those which are marked as confidential, in order to meet legal obligations. If I have sent my response by email, Ofcom can disregard any standard e-mail text about not disclosing email contents and attachments.

Ofcom seeks to publish responses on receipt. If your response is non-confidential (in whole or in part), and you would prefer us to publish your response only once the consultation has ended, please tick here.

Name

Signed (if hard copy)