



REVIEW OF LISTED EVENTS

**IDENTIFYING TELEVISION SERVICES THAT ARE
FREE-TO-VIEW AND WIDELY AVAILABLE**

CONSULTATION SUBMISSION

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A submission from STV Group plc

Closing 18 January 2019

STV welcomes this opportunity to respond to Ofcom's consultation on Listed Events: identifying services that are free-to-view and widely available.

As the holder of two Channel 3 licences in Scotland, the reach and penetration of STV's PSB service has played an important role in the access and delivery of listed events to mass audiences.

Whilst access to our programme service remains primarily via terrestrial, satellite and cable platforms, we are seeing an increase in the use of IPTV to watch STV Player which carries a simulcast of STV across a number of platforms.

For the 2018 World Cup Tournament, itself a Listed Event, television audiences remained very high, with 3.5m viewers watching on STV, representing up to 70% share of viewing.

Our experience of how this IP access is evolving is consistent with Ofcom's proposed methodology within the consultation, whereby consumers gravitate to the largest available screen, using devices such as set top boxes, HDMI sticks and screen mirroring to facilitate access via internet delivery alongside DTT, DSAT and DCAB connectivity.

We address Ofcom's consultation questions below:

Consultation questions

Question 1:

Do you agree that our proposed methodology is appropriate? In particular -

- a) *Do you agree that it is appropriate for us to consider the reception of TV programme services through all four main TV platforms, including IPTV?*

STV agrees that that access to IPTV delivered services should be included in the consideration of the reception of TV programmes for the purposes of assessing whether the 95% threshold is achievable for Listed Events.

- b) *Do you agree that it is appropriate for us to consider the reception of TV programme services on the main device in the house, being the largest screen - a TV set if that is available, or a computer or tablet if not?*

STV agrees with Ofcom's proposed methodology based around the primacy of the "main screen", given our own experience of viewing habits seen through monitoring and analysis and the PSB characteristic of "shared viewing experience" identified by Ofcom.

- c) *Do you agree that it is appropriate for us to use data collected through the BARB ES survey in order to calculate the proportion of the population that can receive services?*

We agree the BARB Establishment Survey is an appropriate source of data for calculating the proportions of population that receive television through different means.

- d) *Do you agree that our proposed adjustment for individuals able to receive services on the commercial DTT multiplexes compared with the PSB DTT multiplexes is appropriate?*

STV agrees with Ofcom's proposed adjustment for PSB vs commercial DTT multiplex reception. We note that this analysis will be applied at an aggregated, national level and may not reflect actual experience within specific localities. However, on balance, we agree that the approach is appropriate, underpinned by the sensitivity tests described.

- e) *Do you agree that our proposed approach in relation to IP multi-stream capability is appropriate?*

We agree that the proposed assessment of IP multi-stream capability is an appropriate quality of service measure that should be considered when considering the efficacy of IPTV streaming capacity.

- f) *Do you agree that our proposed approach in relation to assessing the 'free-to-view' condition is appropriate?*

STV agrees with Ofcom's proposed approach in respect of the "free-to-view" condition.

Question 2:

- Do you agree that our proposed approach for keeping the list of qualifying services up to date is appropriate?*

The dynamic nature of consumption and changes in technology will require periodic reviews. STV agrees with Ofcom's proposed approach for maintaining the list of qualifying services in respect of Listed Events. However, given the scale and commercial value of Listed Events, agreements entered into by broadcasters for coverage require a degree of certainty and predictability and that Ofcom should consider a published timeline or interval for applying any changes.

