

Dear Sir/Madam,

Re. Ofcom review of the competition rules in the EPG code.

Channel 4 welcomes Ofcom's review of the competition rules in the EPG code. As a Public Service Broadcaster with a remit to represent the whole of the UK it is vital that the code which governs how EPGs are managed works effectively so that Channel 4 and our other channels can be easily found.

Channel 4 agrees with Ofcom's conclusion that overall "the existing rules are working well" but that some small changes are necessary to ensure transparent processes and reasonable timeframes for changes being made to EPG policies.

Channel 4 agrees that ex ante rules remain the most appropriate means of ensuring effective competition, but it is important that there are clear processes in place. Transparency is essential and it is vital that EPG providers give appropriate notification of any changes they intend to make. This should include a detailed consultation on any proposals with their reasoning for making changes clearly set out and sufficient time to respond to these proposals with the option to complain to Ofcom in the event of a dispute. EPG providers should also allow for sufficient time for the implementation of any proposed changes to allow businesses to plan and adapt to these changes. Channel 4 believes that Digital UK operate a gold standard process in this regard.

Channel 4 agrees with Ofcom's proposals to include a provision which adds a requirement for consultations by EPG providers to be transparent and have reasonable timeframes.

Channel 4 also welcomes Ofcom's description of what it believes would be "objectively justifiable". Channel 4 agrees that this should be "impartial, rational, dispassionate and reflect a legitimate aim" and that unduly favouring channels connected to an EPG provider would fail to meet these requirements. Channel 4 would welcome the inclusion of this clarification in Ofcom's guidance around the EPG code.

Sincerely,

Helen Jay
**Head of Policy and Corporate Affairs,
Channel 4**

