



Ofcom Consultation on Broadcast TV Technical Codes

Submission by MG ALBA

31 May 2016

MG ALBA is short for Meadhanan Gàidhlig Alba (Gaelic Media Scotland) and is the operating name of Seirbheis nam Meadhanan Gàidhlig or Gaelic Media Service.

MG ALBA delivers **BBC ALBA** (the Gaelic language television channel) in partnership with the BBC. BBC ALBA is the first partnership television service to operate under a BBC licence.

BBC ALBA is a success. Audience figures are strong, with over 700,000 average weekly reach (MG ALBA, 2015). BBC iPlayer augments viewing – 7.43m views in 2014 (MG ALBA, 2015).

BBC ALBA is an important part of the Scottish broadcast ecology. PACT (the Producers' Alliance for Cinema and Television) has estimated that BBC ALBA accounts for over 50% of all Scottish commissions by hour (PACT, 2010). The channel commissions 81% of its content from Scotland's independent production sector (MG ALBA, 2015)

Introduction

This submission is in response to Ofcom consultation “**Broadcast TV Technical Codes - Consultation on updates and amendments**”.

Ofcom sets technical standards for the digital terrestrial TV platform (also often known as Freeview). These standards specify the types of signal which should be used by broadcasters, and require minimum standards of reliability for the transmitters that broadcast digital TV services.

The terrestrial TV platform is continuing to change and evolve: for example, several new services have been launched since the digital TV switchover was completed in 2012. New legislation relating to the resilience of communications networks (including broadcast transmitters), has also been adopted since the broadcast TV technical codes were last revised.

Ofcom propose to update and rationalise the TV technical codes to ensure that they are relevant, proportionate, and reflect current technology and broadcast industry practice.

The consultation is in the form of three questions relating to the amendments and changes proposed. There is also the opportunity to include any additional comments or other relevant data.

Q1. Do you agree with the proposed amendments to the Television Technical Performance Code?

Q2. Do you agree with the proposed modifications to the DTT Reference Parameters?

Q3. Do you agree with our proposal not to include an HEVC profile in the Reference Parameters at this stage?

MG ALBA Response

Q1. Do you agree with the proposed amendments to the Television Technical Performance Code?

With regard to section 3 of the consultation document “Proposed changes to Section 2 of the technical code (The Television Signal)” MG ALBA agree with the proposal outlined in sections 3.4 – 3.6 for the removal of analogue TV and associated requirements and the removal of Rules of Operation for Teletext.

With regard to section 3 of the consultation document “Proposed changes to Section 3 of the technical code (Technical Quality Standards)” MG ALBA agree that the standards for subjective sound and picture grading are based on analogue technology and only apply to SD broadcast. MG ALBA however feel that there is still a requirement for technical standards to be included and would wish to see an updated set of standards relevant to digital and HD production techniques. Although the number of complaints regarding poor picture quality has reduced MG ALBA feel that this is due to the public being more accepting of poorly produced material rather than an overall increase in quality.

MG ALBA do not agree that the section regarding lip sync should be removed. Correct lip sync is crucial throughout the production and distribution chain and should be referenced in the code of practice.

MG ALBA agree with the other proposed amendments

Q2. Do you agree with the proposed modifications to the DTT Reference Parameters?

MG ALBA does not agree with the proposal to remove the subjective picture quality parameters nor the minimum audio bit rates. This in our opinion will allow the broadcasting of sound and pictures well below the quality achievable on DSAT. A reduction of picture quality on Freeview will have a negative impact on viewers. Freeview quality is already perceived to be of a lower standard than other platforms.

Q3. Do you agree with our proposal not to include an HEVC profile in the Reference Parameters at this stage?

MG ALBA agree that an HEVC profile should not be included at this stage.