
Q1) Do you agree with our proposals that the main five PSB channels hold the top five slots on EPGs provided UK wide or in the UK outside of Wales?

Freesat agrees with Ofcom's statements on the public good that PSBs provide to the UK viewer and that for this reason these five channels should retain their position in the top five slots on all EPGs in the UK outside of Wales. The continued popularity of these channels – according to BARB these channels accounted for 51% of viewing on all platforms in the first eight months of 2018 – suggests that the UK viewer benefits from this arrangement.

Q2) Do you agree that on EPGs provided for viewers specifically in Wales BBC One, BBC Two and the relevant Channel 3 service should take the top three slots, with S4C in slot four, Channel 5 in slot five and Channel 4 guaranteed a position on the first page?

To ensure that Freesat continues to reflect the values and expectations of Welsh viewers it believes that it should keep S4C at 104. Furthermore, to ensure that Welsh viewers can benefit from easy access to C4, Freesat agrees that C4 could and should benefit from a higher position within the EPG in Wales.

Freesat's broader concern with how this question and the others that follow it, is that prominence is being determined by page number. It believes that with the advent of UHD, the number of slots that can be presented per page will grow significantly, which will undermine any prominence if it is determined by a page.

Q3) Do you agree that BBC Four should be guaranteed a slot within the top three pages of all EPGs?

Freesat already has the BBC Four in the first two pages of its EPG, as it believes this is in line with best practice

Q4) Do you agree that the designated public service News channels (currently BBC News and BBC Parliament) should be guaranteed slots on the first page of the news genre section or an equivalent position within the grouping of news channels on the EPG, as applicable?

Freesat already has the BBC News channels at the top of its news genre, as it believes this is best practice

Q5) Do you agree that CBeebies and CBBC should have guaranteed slots on the first page of the Children's genre or area of the EPG, as applicable?

Freesat already has the Children's channels at the top of its kids genre, as it believes this is best practice

Q6) Do you agree that S4C, BBC Alba, and BBC Scotland should be guaranteed prominence within the first three pages of UK wide EPGs?

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Q8) Do you agree that S4C, BBC Alba, and BBC Scotland should be guaranteed prominence within the first three pages of relevant Nation specific EPGs e.g. S4C in Wales, BBC Alba and BBC Scotland in Scotland?

Freesat already provides prominence to the services mentioned at a level it believes is in line with best practice

Q7) Do you agree that local TV should be guaranteed prominence within the first three pages of UK wide EPGs?

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Q9) Do you agree that local TV should be guaranteed prominence within the first three pages of relevant regionalised EPGs?

Freesat does not agree with Ofcom's proposal to guarantee prominence on the first three pages as it believes this is not in line with its viewers expectations or behaviour. Fig. 9 in Ofcom's report on PSB discovery demonstrated that only a small number of viewers watch these channels even when they are provided a good level prominence, as they are in DTT.

For the reasons stated above, Freesat believes that Ofcom should consider reducing the level of prominence that would need to be provided for local channels

Q10) Do you agree with our proposals to ensure prominence for either the SD or HD version of BBC channels rather than both?

Where it is applicable, Freesat believes that the BBC should be allowed to choose if it provides prominence for either the SD or HD variant

Q11) Do you agree with our proposals to allow broadcasters to swap HD simulcast variants of their SD designated channels, such that those HD variants could occupy the slots which the SD channels would be entitled to?

Freesat believes that broadcasters should be allowed to choose if they want to place the HD simulcast variant of their channels in the slots which their SD channels are entitled to

Q12) Do you agree with our proposal to provide a 12 month transition period once the Code is finalised?

Freesat will aim to complete any transition as quickly as possible, ideally within the 12 months stated above. However, some of Ofcom's proposal may require significant technical work from Freesat's side, it therefore would like an extension for this transition period to 18 months

Q13) Do you think that the prominence regime should be extended to ensure EPGs themselves can be easily found?

For the changes that are being proposed to both have a positive impact in both the short and long term, access to, and the discoverability of, the EPG should be protected.

Q14) Do you agree with the broad range of factors for consideration we have identified? Are there other factors that policy makers should consider?

Freesat agrees broadly with the factors that Ofcom has identified

To ensure that any regulation implemented is successful, Freesat recommends that Ofcom attempts to measure of usage the relevant services across all devices, platforms and services covered by the regime (see the answers to questions 18 & 19) in a consistent manner.

Tracking usage in this manner will allow for Ofcom to measure the impact of different design decisions and which, if any, of the factors identified exerts the most influence over how easy PSB content is to discover.

Q15) Do you agree with the principles we have set out? Are there other principles that should be considered?

Freesat agrees with the principles that Ofcom has outlined, but it believes Ofcom should more clearly state that the principle of PSB prominence and the goals it is trying to achieve is superior to the other principles set out e.g. a personalised TV experience.

Q16) Do you think that the prominence regime should be extended to ensure PSB Players can be easily found?

Freesat already provides prominence to those PSB players on its platform as it believes this is in line with best practice.

Q17) Do you think that the prominence regime should be extended to ensure PSB content can be easily found via recommendations and / or search? If so, what key parameters would you set for this aspect of the regime?

Freesat already provides a prominence to PSB content in its recommendations and search functionality, it believes this is in line with best practice.

Q18) Do you think that the prominence regime should be extended to platforms and devices not currently captured by the EPG prominence regime? If so, how do you think the regime could be extended and who should be captured?

To ensure that consumer expectations of PSB prominence are not negatively impacted and to help maintain a healthy and competitive TV market in the UK Freesat believes the EPG prominence regime should be extended in a manner that achieves these goals

Q19) Do you think that the prominence regime should be extended to online services? If so, who should be captured?

As with its answer to Q18, Freesat believes that the regime should be extended to achieve a robust and competitive TV market in the UK that protects PSB prominence