

Your response

Question	Your response
<p>Question 1: 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?</p>	<p>Confidential? – No</p> <p>We agree that decisions on EPG prominence should have due regard to the public value for society. In that context we have no objection to the proposed prominence for the main five PSB channels. We would note, however, that Channel 3 is in some sense a direct competitor with local TV (see answer to question 7)</p>
<p>Question 2: 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?</p>	<p>Confidential? – No</p> <p>No Comment</p>
<p>Question 3: Do you agree that BBC Four should be guaranteed a slot within the top three pages of all EPGs?</p>	<p>Confidential? – N</p> <p>Yes. But not page 1</p>
<p>Question 4: 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?</p>	<p>Confidential? – N</p> <p>No comment</p>
<p>Question 5: 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?</p>	<p>Confidential? – N</p> <p>No comment</p>

Question 6: Do you agree that S4C, BBC Alba, and BBC Scotland should be guaranteed prominence within the first three pages of UK wide EPGs?

Confidential? – N

Yes. But not page 1 in England

Question 7: Do you agree that Local TV should be guaranteed prominence within the first three pages of UK wide EPGs?

Confidential? – N

We strongly disagree with downgrading the prominence of local TV in the EPG. This bias against localism runs counter to government policy and would undermine KMTV's commercial model, already damaged by an environment that works against the interests of smaller media suppliers.

In his speech to the Royal TV Society on 18 September, the Secretary of State stated that 'the government will support PSBs to ensure they continue to thrive, and stay prominent, as part of a healthy, sustainable and dynamic media landscape,' and would want to ensure that the government helps to support the future of public service broadcasting. DCMS has also recently launched a Civil Society strategy (to go along with the Industrial Strategy) to put people and communities at the heart of decision-making.

KMTV strongly supports these government objectives. Our business model has a strong PSB remit at its heart. The University of Kent has an aspiration to build on the first year of KMTV operation to 'confirm KMTV as the 'go-to' TV station for local news and community involvement in Kent and to help build a sense of common purpose and identity in the region.' While we accept that there might be some compensation from a slightly higher position in VM (though we question whether this would be really material), the implied substantial drop in prominence on Freeview would be seriously damaging to our commercial interests (and we do not receive an open ended share of the licence fee).

OfCom is well aware of the precarious financial outlook for local TV. We have the same pressures as the press industry: as the evidence for the Cairncross Review starkly noted, 'today's aggregate advertising expenditure and net circulation figures equate to about half of their 2007 value.'

We note, finally, that research for this consultation suggests that a page 1 EPG listing has a substantial implied financial value. So the

	<p>effect of this proposal would seem to be to take resource from the small and weak to benefit the more powerful.</p> <p>We strongly believe Local TV should continue to be on the first page of EPG</p>
<p>Question 8: 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?</p>	<p>Confidential? – N</p> <p>No comment</p>
<p>Question 9: Do you agree that Local TV should be guaranteed prominence within the first three pages of relevant regionalised EPGs?</p>	<p>Confidential? – N</p> <p>We disagree with this proposal for the reasons set out in our answer to question 7. It should be Page 1</p>
<p>Question 10: Do you agree with our proposals to ensure prominence for either the SD or HD version of BBC channels rather than both?</p>	<p>Confidential? – N</p> <p>Yes</p>
<p>Question 11: 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?</p>	<p>Confidential? – N</p> <p>No comment</p>
<p>Question 12: Do you agree with our proposal to provide a 12 month transition period once the Code is finalised?</p>	<p>Confidential? – N</p> <p>No. Many TV stations will have built their EPG prominence into their business model. A change over 12 months is much too short to enable them to make the necessary commercial adjustments – especially, in the extreme, should the change put their continued viability at risk.</p>

<p>Question 13: Do you think that the prominence regime should be extended to ensure EPGs themselves can be easily found?</p>	<p>Confidential? –N</p> <p>Yes. It is helpful to be thinking through these issues now. On KMTV’s part, there is a substantial viewing demographic for our news content on-line. We would support a simpler way of enabling viewers to see content via other routes.</p>
<p>Question 14: Do you agree with the broad range of factors for consideration we have identified? Are there other factors that policy makers should consider?</p>	<p>Confidential? – N</p> <p>We are concerned that the direction of travel is towards bigger equals better. If prominence is solely a matter of clicks, then local provision will lose out.</p>
<p>Question 15: Do you agree with the principles we have set out? Are there other principles that should be considered?</p>	<p>Confidential? – N</p> <p>Yes. We would particularly value a defined results box relating to (defined) categories of public service broadcasting</p>
<p>Question 16: Do you think that the prominence regime should be extended to ensure PSB Players can be easily found?</p>	<p>Confidential? – N</p> <p>No comment</p>
<p>Question 17: 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?</p>	<p>Confidential? – N</p> <p>No comment</p>
<p>Question 18: 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?</p>	<p>Confidential? – N</p> <p>We would in principle welcome the extension of the prominence regime to other platforms and devices but recognise that the consultation document raises complex issues on which we are not well-placed to comment.</p>

Question 19: Do you think that the prominence regime should be extended to online services? If so, who should be captured?

Confidential? – N

We would in principle welcome the extension of the prominence regime to other platforms and devices but recognise that the consultation document raises complex issues on which we are not well-placed to comment.