

Your response

Question	Your response
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?	Confidential? – N No comment
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?	Confidential? – N No comment

Question 3: Do you agree that BBC Four should be guaranteed a slot within the top three pages of all EPGs?

Confidential? – N

On free to air platforms such as Freeview, Freesat etc the 'slot' is dictated by the assigned logical channel number (LCN). Licensed (by Platform Operator) TV receivers position services within their EPG's based on the assigned LCN.

We do not agree with the principle of placing services in a mandated range of EPG pages for the following reasons :

- a) Manufacturers are currently able to innovate and design their own User Interfaces (UI's). Assigning a service to a range of EPG pages implies a defined number of rows per EPG page, to ensure services would be located in the correct range of EPG pages. This would limit the ability to be innovative in future User Interface designs, therefore reducing differentiation of products in a highly competitive market.
- b) The assumption here is that the EPG is a classical grid based TV guide. As content delivery evolves, we expect that new and alternative styles of EPG will emerge, that would not sit within such a grid concept. Then such a restriction on the EPG will limit innovation.
- c) The EPG code has recently been updated for improved Accessibility. This proposal will impact the ability to ensure EPG suitability for visually impaired viewers (larger EPG text may affect page numbers).

We believe that Prominence should only apply to the default installation and modification / personal customisation must be possible if desired by the user.

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?

Confidential? – N

No objection, but should other PSB equivalent content also be considered.

<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 objection, but should other PSB equivalent content also be considered.</p>
<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?</p>	<p>Confidential? – N</p> <p>See response in Q3</p>
<p>Question 7: Do you agree that Local TV should be guaranteed prominence within the first three pages of UK wide EPGs?</p>	<p>Confidential? – N</p> <p>See response in Q3</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>See response in Q3</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>See response in Q3</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>We agree that only one service should have prominence for PSB's (not only for the BBC).</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>We agree, noting :</p> <ul style="list-style-type: none"> a) That the handling of regional content variation needs to be considered. The burden to develop a suitable technical solution should fall on the broadcasters, using technologies from open standards. b) That the broadcast HD variant may not offer a better quality of service than the SD version (due to RF conditions etc). c) There should be no negative impact on the vast legacy population of TV's and STB's already in the market.

<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>For broadcast LCN changes we see no issue.</p> <p>For any changes to EPG designs, we ask that OFCOM engages in detailed discussions with industry stakeholders, in order to agree a suitable sunrise, to minimise any impact.</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>Prominence should not be extended to the EPG itself.</p> <p>If the EPG can be easily found via the remote control, then we see no need for any additional requirements.</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>No comment</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>However OFCOM decides to proceed, it is essential that viewer choice and personalisation is not prohibited. Customisation from the initial default condition must be permitted, if so desired by the user.</p>

Question 16: Do you think that the prominence regime should be extended to ensure PSB Players can be easily found?

Confidential? – N

Already PSB's take up an increasingly large amount of space on home UI's, that restricts creativity and design flexibility. PSB's are forcing out other competitive services by demanding such space. It is already a challenge to add new functions, content offerings or new free to view players onto the home screen. Then extending prominence further risks claims of anti-competitiveness while further restricting product innovation.

A reasonable solution is to use a single easily recognisable home UI Platform icon that would reduce the space taken by the individual players. Some platforms require an icon for the platform, plus icon's for all the available PSB players be displayed on the home UI. This results in many 'slots' being required by PSB's. A single icon to allow access to the platform could also improve the overall prominence and accessibility point to the platform, while allowing innovation space for other new or popular applications.

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?

Confidential? – N

Commercial discussions are required between PSB's and search / recommendation engine providers / manufactures. Such a condition should not be used to prevent devices being sold if commercial terms cannot be agreed. It should also not be used by PSBs to apply anti-competitive pressures on other content, service or search providers.

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?

Confidential? – N

See response in Q13.
Prominence should not be extended to the EPG itself.

Rather than considering to expand restrictive rules to devices in other categories, a more reasonable approach should be adopted, that allows the next era of Televisions and other devices to innovate with freedom and without severe restrictions.

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

Confidential? – N

Prominence should not be extended to online services.

Rather than considering to expand restrictive rules to other devices in other categories, a more reasonable approach towards Televisions should be adopted, that allows the next era of Televisions and other devices to innovate with freedom and without severe restrictions.