

Consultation response form

Google response

This document contains Google's response, on behalf of Google TV and Android TV, to Ofcom's consultation on prominence and accessibility on connected TV platforms (**Consultation**) under the Media Act 2024 (**Act**), covering Ofcom's main Consultation document (**Consultation Document**), draft code of practice for regulated television selection services (**Code**), and draft guidance on the agreement objectives (**Guidance**).

Question	Your response
<p>Question 1: Do you agree with our approach to considering appropriate prominence and our analytical framework? Please provide your reasoning, and if possible, any supporting evidence.</p>	<p>We consider Ofcom's general approach and analytical framework regarding appropriate prominence to be broadly reasonable, but are concerned that due consideration is not being afforded to user choice or the quality of the user's experience of the RTSS. For example, in paragraph 3.20 of the Consultation Document (which lists the "<i>high-level principles</i>" that Ofcom has identified as "<i>relevant and important when establishing the appropriate degree of prominence on an RTSS</i>"), no consideration is given to user choice nor implied preferences. These are critical considerations when designing digital products which attract and retain users. We raise this because a failure to provide due consideration for user choice in the core principles underpinning the approach to appropriate prominence will likely lead to reduced user value in RTSS UIs which, in turn, will reduce the engagement that we and other RTSS providers can deliver for any IPS or DIPS.</p> <p>[Redacted]</p>
<p>Question 2: Do you agree with our proposals on app menus, and our assessment of their associated impacts? Please provide your reasoning, and if possible, any supporting evidence.</p>	<p>We consider the separation of regionalised and non-regionalised options to be proportionate. However, we consider that the proposals on app menus extend far beyond the level of 'appropriate' prominence and move firmly into the territory of 'significant' prominence, going further than what the legislation intended - the 'significant' standard was debated and rejected at the time of the Act being passed. The proposals do not reflect the fact that the PSBs, in total, deliver just 18% of VOD viewing, of which roughly half comes from BBC iPlayer¹. We consider that this should be taken into account when determining how these</p>

¹ This has been calculated based on Figure 16 in Ofcom's Media Nations UK 2025 report: <https://www.ofcom.org.uk/siteassets/resources/documents/research-and-data/multi-sector/media-nations/2025/media-nations-2025-uk-report.pdf?v=401287>.

provisions should meet the 'appropriate' - rather than 'significant' - standard.

Specifically, we believe this to be the case under both the non-regionalised and regionalised options:

- **Non-regionalised:** The requirement in action A1.3 to provide two-thirds of the top nine positions to the PSBs is beyond 'appropriate' prominence (60% provision vs. ~18% of engagement). We consider that the provisions for BBC iPlayer, ITV, Channel 4, and Channel 5 are proportionate, but that the requirement should be altered to ensure that S4C and STV are in the **top 15 positions but not necessarily visible when the user first arrives at the row**, assuming the apps row scrolls for the user (rather than these being on a separate page to which the user must click through). We believe this would still provide an appropriate level of prominence for all PSBs. Alternatively, using the approach that Ofcom has recommended for Channel 4 outside of Wales, we would support the recommendation being altered to state that S4C and STV should be "*easily discoverable*".
- **Regionalised:**
 - The solution to swap ITV and STV in Scotland seems appropriate.
 - The solution to place S4C in the position of Channel 4 in Wales also seems appropriate. However, the requirement to then, in addition, place Channel 4 in one of the top eight positions and above the fold is not appropriate. The argument made is that this is aligned to the EPG code; however, the EPG code also means that no PSB linear channel is seen anywhere else in the EPG (i.e. it is only shown once), whereas on an RTSS there are then material additional requirements to promote DIPS content. Therefore, we consider that Channel 4 should be "*easily discoverable*" within Wales, as per Ofcom's proposal for S4C outside of Wales.

In the case of S4C, there is also duplication in the prominence of this content as all S4C channels and content are carried within BBC iPlayer and therefore already provided prominence through this route.

Additionally, consideration should be given to the way in which the apps row is designed when prominence is considered. For example, materially different experiences are provided by (a) a row that continuously exposes more apps as the user scrolls, as opposed to (b) more apps only being visible on a separate page.

We believe that, in the case of (a), the requirement Ofcom lays out for all DIPS to be visible without scrolling should be removed. The negative impact of Ofcom's proposal is that it limits RTSS' ability to apply positive user experience principles in design, reduces the ability for accessible interfaces (by enforcing a 'busier' UI), and limits the scope for innovation.

The comments above seek to align with Ofcom's general proposed approach; however, **we believe there is a more effective solution** which we have already deployed in other markets (e.g. France). We propose that the DIPS should be able to be contained within a 'folder' on the apps row [redacted]. This solution has a range of benefits:

- It would provide an easy navigation hint to users to find high quality local content destinations.
- The aggregate attractiveness of the DIPS content would help to further promote all DIPS.
- Design language used on other devices (e.g. mobile devices where folders show a preview of the app logos of the apps within the folder) can help users quickly navigate. This supports the Act's aim to secure promotion and easy access to the full range of DIPS (as designated and feasibly altered over time).
- Overall, the number of clicks to access DIPS can be reduced.
- Users would still have the ability to change this, as is always their choice, including moving apps out of the folder.

We commend the principle set out in paragraph 3.81 of the Consultation Document to ensure respect for user choice.

Feasibility of implementation

Subject to our comments above, the technical and practical feasibility of making these changes on devices already in the market, [redacted], are highly challenging, **and we would therefore not agree that the requirements are proportionate on devices already set up by users.**

[Redacted].

Additionally, whilst other RTSS may choose to alter the app row ordering, we have always maintained a position that we do not alter this row once a user has control of it as we believe the negative user impact is material. [Redacted]. We therefore request that Ofcom clarifies that this is only required for devices at point of setup and a retrospective update to the base is not required.

Value transfers

	<p>In relation to paragraph 3.88 of the Consultation Document [redacted]. Further guidance is needed on whether Ofcom would expect a DIPS to reduce its current commercial requirements (if relevant) to align with Ofcom’s guidance so as to support the commercial mitigation that Ofcom notes is important to mitigate the increased costs [redacted]. Alternatively, would Ofcom deem that a greater degree of prominence in this area can be balanced by a different approach in other areas of the RTSS?</p>
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<p>Question 3: Do you agree with our proposals on primary content areas , and our assessment of their associated impacts? Please provide your reasoning, and if possible, any supporting evidence.</p>	<p>We have fundamental concerns about both Ofcom’s approach to this section as well as the proposals concluded.</p> <p>The approach</p> <p>Firstly, Ofcom notes in paragraph 3.36 of the Consultation Document that just 10% of clicks are driven by primary content areas but then requires these areas to be materially weighted towards DIPS content: a position we view as disproportionate to meet the bar of ‘appropriate’ rather than ‘significant’ prominence.</p> <p>Secondly, in its approach Ofcom has set as the precedent the prominence afforded to Designated Channels² within a traditional EPG interface/grid. In this situation, a user is presented with a small number of Designated Channels followed by the rest of the EPG, but there is no requirement on EPG providers to continually intersperse Designated Channels throughout the EPG should a user choose to scroll down. We would strongly argue that, where an apps row is clearly displayed on the RTSS, a similar principle should be applied and, whilst DIPS content should be included (and acknowledging Ofcom’s statements around this being free of charge), the scale of any prominence provided should be aligned to the viewing/engagement levels of DIPS content and the interest from users (on an individual or group level) to particular content. The basis of this is that the apps row has already provided prominence for the DIPS when such a row is itself prominently placed.</p> <p>Thirdly, the importance of user choice is not being provided any level of reasonable consideration. Users have, in droves, been adopting the variety and quality of content offered by non-PSB streaming services, most of which focus heavily on a personalised experience. This level of personalisation is expected of RTSS from users but is seemingly not considered as a factor in Ofcom’s determination of how to ensure PSB prominence remains appropriate. [Redacted], we do not believe that the preference of users or the experience they receive should be negatively impacted by overly weighting the scales in the favour of the PSBs beyond what is proportionate to secure appropriate prominence (and we believe these proposals do, especially action 2.2).</p> <p>Additionally, if this is enforced as proposed, users will find less value in the RTSS interface and therefore focus more of their engagement on the personalised experiences available to them (i.e. the international IPS) which we expect will entrench the falling PSB engagement.</p> <p>Lastly, this approach will crowd out any chance of smaller</p>
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content providers to engage audiences. With DIPS prominence at the level envisaged, and the large IPS delivering the vast majority of engagement for users, the space and scope of smaller, local (non-PSB) providers to succeed will be further diminished.

Given these concerns with the approach itself, we do not believe that the current proposals (particularly with regard to action 2.2) are proportionate or reasonable.

The proposals

We have no comments on actions 2.3 and 2.5, and we accept what Ofcom is seeking to achieve.

While we consider action 2.4 to be reasonable, we would expect RTSS providers to be able to regionalise parts of the RTSS whilst not regionalising others. [Redacted]. We are willing to discuss this in more depth with Ofcom, if valuable.

Action 2.2, in addition to the comments above in relation to the general approach, does not consider that content can be available from multiple providers at the same time, but rather assumes a 1 -2-1 relationship between a content recommendation and a DIPS /IPS. We believe this can be easily clarified by Ofcom stating that an RTSS may consider content to be public service content if it is available on a DIPS (whether flagged as public service content in metadata by the DIPS or not) but no matter where this is played back by the user.

For example, Channel 4 produces Taskmaster but then chooses to sell this to Netflix, meaning users have a choice of playback location. It should be made clear that an RTSS has fulfilled its obligation in relation to promoting public service content no matter where the user chooses to play this content back. Our rationale is twofold: (a) the content which has been deemed as valuable to the public is viewed, and (b) the DIPS (Channel 4 in this case) is choosing to carry and/or sell content with third parties in the market for their own commercial reasons which should not then have to be managed by an RTSS.

Areas of clarification

In addition, we request clarity from Ofcom on three related items:

1. (a) Should Listed Channels displayed within the primary content areas be considered towards the provision for public service content, and (b) whether the inclusion of Listed Channels within an RTSS' primary content areas can be required by a DIPS provider as a condition of carriage of their DIPS service?[Redacted].
2. Where editorial inclusion is offered to a DIPS on an

operational day -to-day basis (for example, exposure of live sporting events within a hub for that sport or a range of sports created by the RTSS), (a) whether it is expected that the DIPS should support such inclusion to obtain the prominence this affords, and (b) if rejected by the DIPS, please confirm that the RTSS is released from a requirement to somehow make up the effective reduction in promotion.

3. [Redacted]. We request that Ofcom confirms that editorial oversight or control of the RTSS (or elements within) by the PSBs (as a whole or individually) would be deemed 'additional' terms under paragraph 5.22(b) of the Consultation Document.

Alternative recommendation

We believe that a more appropriate recommendation would be for RTSS to:

1. Ensure DIPS content is included within primary content areas (noting the no charge already covered in other areas by Ofcom).
2. Consider how to provide exposure broadly in line with the expectations of users considering an individual users' engagement on the platform as well as the market wide engagement with DIPS.
3. Provide additional features or promotion (either constant or around key content moments) to enable DIPS to expose themselves to the audience as a whole.

<p>Question 4: Do you agree with our proposals on search, and our assessment of their associated impacts? Please provide your reasoning, and if possible, any supporting evidence.</p>	<p>We agree with the core principle we understand Ofcom are pursuing here, which is that the best search result for the user should be the response they are served, and this should not advantage or disadvantage one provider over another.</p> <p>However, clarity from Ofcom is needed in relation to the following items:</p> <ol style="list-style-type: none"> 1. Where DIPS content is not relevant, or less relevant, for the user and their query, then DIPS content prominence is not relevant either. 2. The requirements set out should make clear that they relate only to TV/Film content searches (or other formats deemed to be public service media over time). With the expansion of voice queries and AI, the TV will become a surface increasingly akin to a general compute device with users able to ask for information, the generation of new media, and action to be taken on their behalf. These non-media related queries should explicitly be exempt from these search requirements (for example, by clarifying the definition of search provided by Ofcom). <p>Additionally, we would request that Ofcom acknowledge that it is likely that RTSS will have a much deeper understanding of their own content (for example, as they may have the full production history, deeper metadata sets, and/or the ability to ‘scrape’ their own content for highly detailed metadata tagging which may not be possible to acquire from a third party IPS/DIPS). This fact may mean a greater ability to respond to a user’s request with first party content, which is not an act of self preferencing, but rather a practical reality.</p> <p>Welsh language</p> <p>We note Ofcom’s comment in paragraph 3.155 of the Consultation Document that the technical complexity of supporting the Welsh language in search is material, and agree with Ofcom’s position that RTSS should consider what can be done to improve this. However, in any reasonable implementation timeframe for the other sections, any partial or full solutions will take materially more time. Therefore, we recommend that Ofcom clarify the language used to specify that RTSS should consider how to improve this over the medium and long term to note the timing challenges, significant investment of time and resources to find solutions, and availability of the required underlying technology and data needed to address the technical complexity.</p>
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<p>Question 5: Do you agree with our proposals on listed channels, and our assessment of their associated impacts? Please provide your reasoning, and if possible, any supporting evidence.</p>	<p>We acknowledge the pragmatic aims of this section, with a couple of questions, areas of clarification, and a concern related to the practicalities in the market today.</p> <p>Action A4.3:</p> <ul style="list-style-type: none"> • It should be made clear that, should the live TV area have a limit on the number of channels displayed, then a proportionate reduction in the number of Listed Channels should be permitted. For example, if the live TV area is limited to 20 positions, BBC One, BBC Two, ITV, Channel4, Channel5, S4C, and STV are the only required Listed Channels (as this is aligned to action A4.3(h), permitting BBC Alba, BBC Scotland, BBC3, and BBC4 being in positions 21-24). • Ofcom should clarify that the DIPS must not withhold distribution by either limiting an RTSS' ability to utilise the rest of a live TV area in the way they deem appropriate nor require the inclusion of non-Listed Channels (and that Ofcom would see such requirements as 'additional' terms). <p>Action A4.4:</p> <p>As per our response to Question 3, we would request Ofcom clarify that an RTSS may localise some elements of the interface but not others. We believe, in aggregate, this will be to the benefit of users as it will enable a greater degree of localisation where practical, but acknowledge that some areas of the UI are more complex to localise. If this request is not permitted then it risks an RTSS not localising where feasible because localising the entire RTSS is infeasible.</p> <p>Live TV area as a condition of carriage</p> <p>[Redacted]. We would request clarity from Ofcom on the following:</p> <ol style="list-style-type: none"> 1. Is the inclusion of a live TV area, given the requirement for Listed Channel prominence within this, considered towards the provision of DIPS prominence required of the RTSS? 2. Given Ofcom is not stating that an RTSS must or should include such an area, can Ofcom confirm that it would deem such a live TV area to be an 'additional' term in negotiations and therefore not be an element over which a DIPS can refuse carriage if not included (and by extension, if such an area is not provided prominent placement within the RTSS)? <p>[Redacted].</p>
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<p>Question 6: Do you agree with our proposals on attribution , and our assessment of their associated impacts? Please provide your reasoning, and if possible, any supporting evidence.</p>	<p>Action A5.2:</p> <p>Whilst we acknowledge the aim of this recommendation, it does not consider the fact that (a) as previously noted, it is highly common for content to be available on multiple DIPS/IPS at the same time, and (b) whilst the DIPS/IPS offering the content to the end user may have the rights to distribute the content, they may not have the branding rights (for example, the BBC may acquire for distribution a Disney film and Disney may require that their content images are branded with their logo rather than any onwards distributor [redacted]).</p> <p>As currently drafted, we believe action A5.2 to be practically infeasible to deliver under all circumstances, particularly where the content is not created/commissioned and owned by the DIPS in question.</p> <p>We would strongly recommend that this action is removed and instead action A5.3 is acknowledged to cover the objective to ensure DIPS are afforded the same attribution as others and therefore it is made clear to users where they can view the content. If Ofcom does not consider this goes far enough, we would recommend one of two alternative approaches:</p> <ol style="list-style-type: none"> 1. removing action A5.2 but altering action A5.3 to require an RTSS to undertake reasonable steps to signal to users where (i.e. on which DIPS/IPS) content is available; or 2. altering the language in action A5.2 to limit this requirement to content commissioned and owned (within the UK) by the DIPS carrying such content. <p>Action A5.3:</p> <p>We have no objection to action A5.3 in principle; however, we recommend Ofcom clarifies that such attribution must be offered by the RTSS but, if a DIPS chooses not to utilise a particular piece of functionality or capability, that the RTSS is not required to invest to overcome a lack of provision from the DIPS. [Redacted].</p>
<p>Question 7: Do you agree with our proposal on alternatives to visual information , and our assessment of its associated impacts? Please provide your reasoning, and if possible, any supporting evidence.</p>	<p>No comment.</p>

<p>Question 8: Do you agree with our proposal on text and image enlargement , and our assessment of its associated impacts? Please provide your reasoning, and if possible, any supporting evidence.</p>	<p>We support the objective Ofcom states. However, we would like Ofcom to clarify that the requirement in action B1.4 to permit users “<i>to enlarge the size of any elements of the user interface necessary to make use of the [RTSS], including images and text</i>” applies to “<i>... images and/or text (as relevant)</i>”, rather than to “<i>images and text</i>”. It is our understanding that Ofcom does not intend to make it mandatory for images to be magnified if such action is not required for users to navigate the RTSS.</p>
<p>Question 9: Do you agree with our proposal on distinguishable text and images , and our assessment of its associated impacts? Please provide your reasoning, and if possible, any supporting evidence.</p>	<p>No comment.</p>
<p>Question 10: Do you agree with our proposal on information on accessibility features , and our assessment of its associated impacts? Please provide your reasoning, and if possible, any supporting evidence.</p>	<p>No comment.</p>
<p>Question 11: Do you agree with our proposal on labelling of accessible content , and our assessment of its associated impacts? Please provide your reasoning, and if possible, any supporting evidence.</p>	<p>The overarching aim of ensuring that DIPS can provide accessibility information to an RTSS and the RTSS should, where they include programme information, utilise this, appears proportionate. However, we believe the clarification in paragraph 4.93 of the Consultation Document that this must be done at an episode rather than programme/series level is neither proportionate nor practically more useful to users.</p> <p>Unless content is recommended on an episode level (an approach we do not believe occurs with any regularity across the market), the approach in paragraph 4.93 would require an RTSS to build an entirely new section of the interface with either a large grid showing each DIPS/IPS (not uncommon for this to be 4+ services) where the content is available by episode and then noting what accessibility feature is available in each cell. We believe this would not provide a good user experience.</p> <p>Additionally, given the extremely limited data provided to RTSS by DIPS/IPS today in this regard (and the lack of any reciprocal requirement on DIPS to provide this data), the likely impact is that the impression given to the user is that there is no accessibility feature available where, in reality, when they open the DIPS/IPS</p>

	<p>they will find the accessibility feature as an option.</p> <p>We would recommend that Ofcom alter the approach set out in paragraph 4.93 of the Consultation Document to suggest that RTSS give consideration to the user's desire for better accessibility signposting and take commercially reasonable steps to improve this over time.</p>
<p>Question 12: Do you agree with our proposal on enabling use of the available accessibility features, and our assessment of its associated impacts? Please provide your reasoning, and if possible, any supporting evidence.</p>	<p>Whilst not specific to this question, we would suggest ensuring that DIPS are required (unless the user overrides this within the DIPS' own settings) to integrate with and respect the platform level settings the user has selected. For example, if a user turns on subtitles at a global RTSS level then a DIPS should respect this and turn on their subtitles feature. This will mean that users are able to easily manage their accessibility features at a platform level rather than needing to understand the interface of every DIPS/IPS individually.</p> <p>In addition, DIPS should be required to integrate with and respect incoming requests (e.g. from the RTSS voice service) for accessibility features to be triggered. For example, if a user asks the RTSS voice control to enable subtitles, and there is an integration provided by the RTSS to all DIPS/IPS to pass on this information, then the DIPS must integrate with this and respect the user's request by turning on the subtitles.</p>
<p>Question 13: Do you have any views or evidence on the effectiveness or impact of any other actions in relation to making use of the RTSS and finding/making use of accessible programming? Please provide your reasoning, and if possible, any supporting evidence.</p>	<p>No comment.</p>
<p>Question 14: Do you agree with our proposed draft Guidance, and our assessment of its associated impacts? Please provide your reasoning and, where relevant, any supporting evidence.</p>	<p>[Redacted] (across sections):</p> <ol style="list-style-type: none"> 1. With regards to BBC iPlayer, we would request Ofcom confirm that, despite historical precedent, the BBC is bound by the same requirements and expectations as other DIPS, particularly with regards to delivering an application which operates and integrates with an RTSS at their own cost. 2. [Redacted]. Can Ofcom confirm if they consider the carriage of BBC Sounds/BBC Interactive TV (and associated technical requirements) outside the scope of 'core' terms such that they cannot be imposed as a condition of carriage?

3. [Redacted] Can Ofcom confirm that they consider Remote Control Unit (RCU) buttons/functionality to be outside the scope of 'core' terms and therefore cannot be imposed as a condition of carriage?
4. [Redacted]. **We would strongly recommend** that Ofcom require that any DIPS technical approval/testing procedure should be at an RTSS level (or, for example, Operating System version of an RTSS) rather than at a device level, with device level testing being required only should issues arise on a specific device. This would align with the design of the Act.

Payments:

No comment.

Enable and maintain inclusion:

We are supportive of the principle that the RTSS costs are borne by the RTSS and the DIPS costs by the DIPS.

Prominence:

1. We would request Ofcom add a section (d) to the position set out in paragraph 5.53 of the Consultation Document to make it clear that other integrations (such as with on device and service side APIs) may be required to power particular features on an RTSS interface thus enabling the RTSS to meet its obligations.
2. The quality of metadata provided by the DIPS will have a material effect on the ability of an RTSS to meet its obligations so it should be made clear that the metadata provided should be of a quality and depth as recommended by the RTSS.
3. We are supportive of the "*... to the standard expected by audiences*" noted in paragraph 5.41 of the Consultation Document and would recommend this is augmented by "*... and to the standard generally required on the RTSS of IPS integrated with its interface*".
4. Whilst we understand why Ofcom has not included this, we believe it prudent to note that other platform features [redacted] deliver outsized engagement and, whilst RTSS are required to provide prominence, if DIPS do not invest in these kinds of features, they will lack the ability to compete effectively nor will they engage audiences in the way they wish to navigate to content . In addition, the lack of investment from DIPS in these features reduces the value of an RTSS to users. We would therefore argue, to the benefit of DIPS, RTSS, and (critically) users, such features should be considered 'core' terms where an RTSS can provide data to an DIPS showing the user

	<p>engagement with these features will provide greater returns than many other features.</p>
<p>Question 15: Do you agree with the assessment of the combined impact of our proposals when considered as a package? Please provide any relevant evidence that supports your position.</p>	<p>We note that Ofcom has provisionally concluded that “ <i>the proposals [in the Code] do not go any further than is necessary for providers to comply with their duties and leave substantial scope for providers to choose how they comply in practice</i> ”. Although we agree with this provisional conclusion in many respects, as explained in more detail throughout this response, we consider that certain proposals go beyond the requirements that the Act imposes on RTSS providers and are disproportionate.</p> <p>In particular, we regard specific proposals in the Code as overly prescriptive, such that they fail to provide appropriate flexibility to RTSS providers seeking to comply with their duties as defined in the Act. Additionally, in some instances, we consider that Ofcom’s proposals impose ‘significant’ rather than ‘appropriate’ prominence requirements on RTSS providers, contrary to Parliament’s documented intention and the express language in the Act. Please see our responses above, where we explain the specific proposals in respect of which we have concerns in detail. An example is Ofcom’s proposal in action A1.3 to require RTSS providers to provide two-thirds of the top nine positions in non-regionalised app menus to DIPS, which we address in our response to Question 2.</p> <p>There is a risk that it will be impractical for any RTSS to deviate from Ofcom’s guidelines in negotiations with DIPS for anything considered ‘core’ by Ofcom and therefore, as finally published, the Code and Guidance could de facto become a set of rules for each RTSS to implement as standard practice. This is why we, in a number of areas, recommend that Ofcom explicitly includes scope for more innovation and limits the scale of prescription.</p> <p>We also note, for completeness, that certain proposals in the Code are not merely disproportionate, but in fact technically or practically infeasible for RTSS providers to implement. We have addressed this point in detail elsewhere in our response.</p> <p>[Redacted].</p>
<p>Question 16: Do you agree that 12 months is a reasonable period for all providers to bring themselves into compliance? Please provide your reasoning, and if possible, any supporting</p>	<p>In relation to new devices sold:</p> <p>Subject to our comments relating to the feasibility of specific Ofcom requirements set out, and the delivery of DIPS apps, metadata, assets, and other integrations with immediate effect, then 12 months seems reasonable. However, we are concerned that 12 months is not feasible for all elements should it take more than a couple of months to acquire the relevant</p>

evidence.	<p>assets/integrations from all DIPS providers given average testing times.</p> <p>[Redacted].</p> <p>In relation to devices already in market and set up:</p> <p>[Redacted]. The timelines for changes on existing devices in the market are likely longer (potentially materially) than for new/nearly new devices even where feasible, and as noted, is not feasible for some elements such as the apps row in any case.</p>
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