

## Call for Evidence response form

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<b>Title</b>	Call for evidence: Future of TV Distribution
<b>Full name</b>	✂
<b>Contact phone number</b>	✂
<b>Representing (delete as appropriate)</b>	Organisation
<b>Organisation name</b>	Children's Media Foundation
<b>Email address</b>	✂

## Confidentiality

We ask for your contact details along with your response so that we can engage with you on this consultation. For further information about how Ofcom handles your personal information and your corresponding rights, see [Ofcom's General Privacy Statement](#).

<b>Your details: We will keep your contact number and email address confidential. Is there anything else you want to keep confidential? Delete as appropriate.</b>	Nothing
<b>Your response: Please indicate how much of your response you want to keep confidential. Delete as appropriate.</b>	Nothing
<b>For confidential responses, can Ofcom publish a reference to the contents of your response?</b>	N/A

## Your response

<b>Question</b>	<b>Your response</b>
<b>Q1. How are audience demands and expectations evolving, and how does that vary for users of different TV platforms and different demographics?</b>	The Children's Media Foundation (CMF) is dedicated to ensuring that young people in the UK have access to the best possible media, on all platforms, at all ages. As part of this, we want to ensure that they continue to have access to universally available, high-quality content that is broadcast via digital terrestrial television.

	<p>Our particular concern is the provision of public service media for children and young people which enables children to access a broad range of content that serves as both entertainment and education. DTT is available to families across the UK at no additional cost beyond the licence fee, including those in rural areas with poor broadband connections, disadvantaged communities, and those who either cannot receive or cannot afford to pay for high-speed broadband services.</p> <p>As we have previously asked BBC Distribution, we now ask Ofcom: at what point will it become acceptable for those who cannot freely access public service television in the UK and have no access to any other form of reception to be “left behind”?</p> <p>According to Ofcom’s 2023 Media Nations Report, 90% of those surveyed believe broadcast TV and radio services should be continually supported. The Children’s Media Foundation strongly support this view. For us it is vital that no child is left behind.</p>
<p><b>Q2. What do audience trends mean for the financial prospects and sustainability of TV distribution platforms, and what are the key decision points over the next ten years?</b></p>	<p>There is however no doubt that audience trends amongst the young are already severely impacting on the financial viability of services intended for them. Figures for the 7+ audience clearly indicate a massive shift in viewing to on-demand, which of course entails online delivery. This must be a factor in the decision-making around distribution policy in the next ten years.</p> <p>This impacts not only on the delivery strategies of the commercial public service broadcasters – as evidenced by ITV’s abandonment of its CITV channel and the switch of children’s content to ITVX with resultant cost-savings and by Channel 4’s prioritisation of online delivery for youth content. But it also impacts on the BBC which, though maintaining its budgets for 6+ content, nevertheless faces a similar significant decline in viewing.</p> <p>Clearly commercial and publicly funded organisations need to prioritise effectiveness.</p>

	<p>However, this should not release them from their public service obligations. In the short - term ITV should at least increase its commissioning spend to show commitment to the audience and offer not only the ITVX online service but content, where appropriate, on ITV1 – so that no child is left behind in their de-facto analogue switch-off.</p> <p>Equally the BBC, while redeveloping the iPlayer with increased personalisation, a more child-friendly interface, and greater promotion and prominence for children’s content, and while seeking ways to distribute content for children on the platforms where they are viewing, must continue to serve those who are watching linear television, until it is certain that no child is left behind. This is not the time to set dates for switching off the CBBC Channel</p>
<p><b>Q3. How do broadband networks and supporting infrastructure need to evolve to support resilient delivery of TV over the internet in the future?</b></p>	<p>The key to avoiding having to decide the appropriate number of young people who will be disadvantaged at the loss of television services is to find innovative ways to ensure that everyone – no matter what their location or income level – can receive broadband services.</p> <p>The number of children who might lose out if television transmission were switched off now is already relatively small and will decrease over time. But is – in our estimation – unlikely to reach zero, given the issues of broadband roll-out in remote areas and the fact that 30% of children in Britain live below the poverty line. While we appreciate that many households struggling to feed and clothe their children consider still access to high-speed internet as vital to their children’s needs - as evidenced by the viewing patterns of the 7+ age group - nevertheless, this is a strain on budgets and access cannot be considered as a “given”. It is after all something which might have to be given up when other needs become more pressing.</p>
<p><b>Q4. In what ways might different types of ‘hybrid’ terrestrial and internet services deliver benefits for audiences and what risks may arise?</b></p>	

**Q5. Given the sharing of infrastructure, what would the implications for other sectors be if there was a change to the use of digital terrestrial television (DTT)?**

**Q6. What coordination and planning across the value chain might be necessary to secure good outcomes for audiences and key providers over the long term?**

What is needed is a strategy to ensure low-cost access for all. No child need be left behind if all children have access by right.

Broadband providers should develop a scheme, with government and regulatory encouragement, that ensures a low-cost solution for households on benefits, refugee housing and which could also subsidise the high costs of provision for remote locations.

This could be achieved through a combination of carrot and stick – regulation and government financial support – possibly in the form of tax benefits for companies that participate or comply.

When it can be clearly proven that all have access, then – and only then – will it be advisable to close down DTT services.

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