



Response to Ofcom Call for Inputs – Review of Broadcast Regulation

29 January 2026

BT Group and Broadcast Regulation

BT Group is the UK's leading fixed and mobile communications provider. We build and run the biggest fixed and mobile networks in the country. Our interests in the television market are broad. For example, many content providers leverage our network to distribute IP services, and we market TV services to consumers via EE TV, delivered on platforms including YouView as well as Apple TV.

Introduction

Ofcom is correct to consider its broad approach to broadcast regulation in the context of evolving consumer demand. Notwithstanding substantive work being undertaken by Ofcom to implement provisions of the Media Act 2024 – and by Government and Ofcom to consider future distribution of Public Service Broadcaster (PSB)/VoD content – we believe now is the time for policymakers to consider how new service offerings can deliver equivalent/enhanced consumer experience when accessing PSB content. Fundamental to this is ensuring that consumers – particularly vulnerable consumers – can enjoy equivalent rights in emerging ecosystems compared with those they have today.

Consumer experience in new delivery models

As Ofcom notes in its paper "*Transmission Critical: The Future of Public Media Services*"¹, fewer viewers watch PSB linear PSB content delivered via traditional technologies² compared with five years ago. Instead, many now use the plethora of alternatives available to them instead – including recorded playback, different forms of video on demand. The corollary to this development is that content is now increasingly likely to be accessed via platforms, which provide users with an aggregated 'front page' which allows them to click through to content of their choice (assuming they have appropriate subscriptions).

This model presents major opportunities for enhanced consumer experience, given the preference of platforms to innovate to gain market share. At the same time, however, there are risks that consumers experience will be degraded if the migration is not delivered with them in mind. We see three areas of concern.

- First, consumers will require a higher degree of technical literacy to arrange access to a platform of their choice, organise appropriate sign-ons for each of the content services which they wish to access - including each and every PSB application, if the consumer does not subscribe to an appropriate platform aggregation layer.

¹ Ofcom (2025) [Transmission Critical The future of Public Service Media](#) ²
Such as DTT, Coaxial Cable etc.

- Secondly, consumers may lose access to universal Electronic Programming Guide, which details the different PSB content available to them in a single place.

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- And, finally, consumers rights relating to the recording of content might no longer be fit for purpose if delivered exclusively via be proprietary apps³.

Research published by Ofcom² suggests that these changes in user experience are most likely to negatively impact vulnerable users of PSB content - such as older people, children, and people with disabilities - given these users are disproportionately more likely to benefit from access to EPGs find it harder to navigate new user interfaces to access PSB content.

Implications for Ofcom's broadcast regulation **regime**

While provisions of the Media Act 2024 – particularly prospective regulatory obligations relating to regulated television selection services (RTSS) and accessibility – are designed to address these concerns to some extent, they will not – alone – deliver equivalent consumer rights. This is because this regime is premised on the availability and accessibility of PSB apps as 'walled gardens' accessed via platforms, rather than on PSB content being directly accessible (i.e. without a requirement to sign on to individual apps).

We therefore urge Ofcom – in concert with other policymakers – to conduct a deeper review into how consumer experience works in practice. This would necessarily encompass some of the items identified in Ofcom's call for inputs paper such as advertising and licensing.

As a starting point, we suggest Ofcom considers the following:

- **Monitoring of how the prospective RTSS regime works in practice:** Access to PSB content in some form is a prerequisite for operation of content platforms in the UK market. In practice, this means that PSBs have broad discretion to frame the terms of access to their content. While we agree this is broadly appropriate given the investment made by each in development of their content, it does limit the ability of platforms/aggregators to innovate in service delivery (e.g. through encompassing of EPGs into their 'front page'). Substantive changes would necessarily require development of new agreements between platforms/commercial PSBs regarding how advertising revenue works in practice.
- **Review of established video recording rights for consumers:** As noted above, in the traditional ecosystem, consumers have rights established in primary legislation relating to video recording. At the very least, these rights are likely to be delivered in a very different way in new 'platform' models (with content saved via PSB proprietary apps) compared with in the traditional ecosystem (with users able to record content on devices of their choice) and might, in some cases, atrophy (i.e. if content which has been broadcast is removed). While policymakers might believe an outcome is necessary given wider developments in the ecosystem, a review of these rights would be appropriate to ensure that all stakeholders have considered them. Alternatives, such as new recording rights with new agreements on advertising might be more conducive to delivering good outcomes for consumers.
- **Digital inclusion:** Digital inclusion, affordability, and support for migration in line with wider Ofcom work items to address support for vulnerable users which address Ofcom's concerns that regulations should support audiences wherever they are.

² Ofcom (2024) [TV interfaces & vulnerable users A summary report for Ofcom](#)

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³ Video Recordings Act 1984