

Consultation response form

Your response

Introduction

Everyone TV welcomes Ofcom's continued work to modernise broadcast regulation for a rapidly evolving TV landscape. While our members (BBC, ITV, Channel 4, 5) will comment on areas such as licencing, advertising, and content standards, we focus here on an aspect of the ecosystem that has historically received little regulatory attention: TV remote control design. Based on our experience operating in the TV device market, this is an increasingly important area where regulatory intervention is required.

Developments in TV remote design

Beyond the Communications Act 2003 placing a general duty on Ofcom to encourage the availability of easily usable TV apparatus, there is no formal UK regulation governing TV remote controls.¹ Although many remotes share a harmonised design through compliance with the DTG's D-book² and follow the usability and accessibility guidelines set-out in the U-book, not all manufacturers conform to these standards.

Historically, this lack of regulation was not problematic: when linear TV was the primary route to content, manufacturers had strong incentives to keep remotes simple and centred on channel navigation. All TV devices also included digital TV receivers and hence had to conform to the D-book. Remote design was centred around numbered buttons and the TV guide, with other elements such as coloured buttons and the subtitle button given significant prominence. This paradigm ensured familiar and highly usable design across different devices, for all audiences.

However, the shift towards IP-delivered TV and the rise of modern connected TV user interfaces (UIs) has significantly altered these incentives. TV manufacturers increasingly view app buttons as the primary gateway to content and manufacturers' commercial models are reshaping remote layouts. As many are monetising their own UI environments (and the physical remote) through advertising and paid placements (e.g. promotional hero banners, prominent positioning in app rails), remote designs now increasingly include:

- Prominent 'home' buttons that return users to monetisable environments.
- Multiple guide buttons – e.g. one for a manufacturer's proprietary FAST guide, and another for the traditional EPG.

¹ Communications Act 2003, Section 10.

² This provides the technical specification for all UK Digital Terrestrial Television (DTT) based platforms (including Freeview Play, Freely, YouView, EETV, Now TV, Freesat).

- Dedicated SVOD/ AVOD app buttons – purchased/ negotiated at a global level, with some VOD players making supply of their services conditional on securing one.
- Voice search buttons – which support search results that are often commercially driven in what they return.

Many streaming-only device manufacturers, who are not bound by the D-book, have gone further: removing numbers, coloured buttons, subtitle buttons and clear guide buttons entirely as seen in **Figure 1**.³ [8<] Some TV manufacturers are also calling for updates to specifications which would pave the way for similar changes across all devices.⁴

Figure 1: Amazon Fire TV Stick remote



The design trends outlined are accelerating across both D-book compliant and non-compliant devices,⁵ with four key consequences:

- **Less digitally skilled viewers are being harmed.**
- **Viewers with disabilities are being harmed.**
- **PSB BVODs are losing prominence.**
- **Linear broadcast TV is losing remote control prominence and functionality.**⁶

Less digitally skilled viewers are being harmed

Whilst these changes have some benefits for digitally confident viewers, they present significant barriers for those with low digital skills. Features which have always existed to the benefit of viewers are being removed and TV is at risk of losing its familiar and uniform experience across different devices.

DTG's recent Ofcom-commissioned research into IPTV usability amongst one such group, older viewers, found that "there was a steep usability drop-off as participants moved from traditional navigation using channel numbers to other methods such as electronic programme guides and on-demand services".⁷ Our own research into TV usage in homes without broadband has found that some unconnected viewers are only able to navigate with channels numbers and cannot progress

³ Whilst Amazon Fire Sticks are the most prominent example, Apple TV devices and some Roku devices have similar remotes.

⁴ Some manufacturers are pushing for coloured buttons to be removed from HbbTV specifications

⁵ Demonstrations at CES 2026 showed manufacturers looking to further commercialise their OSs and remotes. 'AI everything' was many commentators' key takeaway – for TVs this means funnelling more user journeys through home screens and search.

⁶ This is a significant issue since live broadcast still accounts for 38% of TV set viewing (Ofcom CMR 2025), rising to 73% for adults 75+.

⁷ Usability project: Identifying challenges and solutions for improving inclusivity and usability in the consumption of internet-delivered television, DTG & iMedia, 2025.

past a smart TV home screen without them. Other unconnected viewers depend on the guide button as their primary route to TV content and they would be similarly stranded without this button.⁸ Multiple ‘guide’ buttons on remotes can also be a source of considerable confusion,⁹ and without coloured buttons viewers may not be able to access the services they need/enjoy.

Without safeguards for these buttons, in terms of prominence as well as guaranteed provision, the least digitally confident viewers risk losing access to television – an issue that will only intensify as the UK moves towards an all-IPTV future.

Viewers with disabilities are being harmed

These developments also have implications on accessibility. 2CV’s recent report for Ofcom on CTV user journeys noted that “research has shown that remote controls themselves can be challenging due to small button sizes, crowded layouts, and poorly grouped or unmeaningful buttons, which make navigation confusing.”¹⁰ This aligns with findings from DTG’s report which found modern TV remotes are generally too complex and not ergonomically designed.¹¹ The loss of dedicated accessibility buttons (e.g. subtitle buttons) and coloured buttons (which can be used to power accessibility features)¹² on some remotes is a further significant blow to disabled viewers.¹³ While Ofcom’s proposed accessibility guidelines for connected TVs are a strong step in the right direction, these rules only apply to UIs and no consideration is given to physical remotes themselves.¹⁴

PSB BVODs are losing prominence

Ofcom’s 2019 review of prominence in public service broadcasting identified that ‘hardware shortcuts’ on remotes (i.e. app buttons such as those for Netflix) are now a key part of content discovery.¹⁵ However, the review stopped short of recommending prominence be extended to remotes and subsequently no provisions were included in the Media Act. Ofcom’s recently commissioned report from 2CV has found more evidence of the importance of these app shortcuts on remotes, with the most common user journeys on connected TVs found to be viewers going “directly to a favourite app, accessed either from the app rail or a dedicated button on the remote.”¹⁶ [3<]Excluding app buttons from CTV prominence was a regulatory oversight and will result in viewers engaging less in PSB content – ultimately undermining the long-term viability of the UK’s PSBs.

As part of Freely’s viewer proposition (and previously Freeview Play’s) we ensure that all Freely TV devices include a Freely button on the remote – seeking to maintain the easy access to FTA channels

⁸ We recently commissioned independent research agency Craft to investigate how easy viewers in unconnected homes found using Freely TVs. We are happy to share more details of this study with Ofcom.

⁹ Usability project: Identifying challenges and solutions for improving inclusivity and usability in the consumption of internet-delivered television, DTG & iMedia, 2025.

¹⁰ Exploring audience journeys on connected TV devices, 2CV, 2025.

¹¹ Usability project: Identifying challenges and solutions for improving inclusivity and usability in the consumption of internet-delivered television, DTG & iMedia, 2025.

¹² Over Christmas 2025, for example, the BBC offered a full slate of BSL programming, all accessible via the Red Button

¹³ Having access to such buttons was a specific recommendation from disabled participants in 2CV’s study.

¹⁴ Prominence and Accessibility on Connected TV Platforms: Consultation on our draft Code of Practice. and draft Guidance on the Agreement Objectives, Ofcom, 2026.

¹⁵ Review of prominence for public service broadcasting, Ofcom, 2019.

¹⁶ Exploring audience journeys on connected TV devices, 2CV, 2025.

that viewers want and value. Viewers using other TV devices would benefit from similar functionality (as would the PSBs).

Linear broadcast TV is losing remote control prominence and functionality

Through remote design choices such as multiple guide buttons, the prominence of the home button, and crowding out of other buttons by prominent app and voice search buttons, manufacturers are directing viewing to their own / 3rd party paid-for content and away from linear broadcast which they are unable to monetise. This is making linear TV and British content harder to access for viewers and discouraging its viewing.

The loss of coloured and subtitle buttons on some devices is also reducing the functionality broadcasters can offer in their linear broadcasts (e.g. without coloured buttons broadcasters may be unable link live channels to their BVOD players). This reduced functionality ultimately means the viewing experience is less appealing. Viewing being directed towards global VOD players instead of UK broadcasters (and by extension non-UK content instead of UK content) not only harms viewers but the entire UK TV ecosystem.

Again, as part of Freely's viewer proposition we mandate that remotes have a guide button which directs viewers to our familiar EPG, and that remotes must include other key buttons such as the numbers and coloured buttons; maintaining a familiar (and highly usable) TV experience. We believe all TV devices offering live TV should provide viewers with a similar experience – noting that manufacturers should be free to innovate around their EPGs and this should not necessitate guide buttons directing viewers to Freeview/Freely EPGs.

Future regulation

As Ofcom continues to modernise regulation for the digital age, we recommend:

- 1. Requiring TV devices offering live channels (whether via DTT or other means) to include easily identifiable and accessible numbered buttons, coloured buttons, and a single, distinctive guide button on remotes.**
- 2. Requiring all TV devices to include physical button(s) enabling key accessibility features on remotes.**
- 3. Extending prominence regulations to include BVOD apps on remotes.**
- 4. Extending prominence regulations to live TV-related buttons on remotes.**

Implementing such measures will require careful design to balance innovation with usability, but we welcome the opportunity to work with Ofcom on a proportionate and future-proof approach.