

About Arqiva

Arqiva is a leading UK communications service and infrastructure provider, operating at the heart of the UK broadcast industry.

Our broadcast transmission network spans over 1,450 sites and delivers universal broadcast television, also known as Digital Terrestrial Television (DTT), and radio services to over 98.5% of the UK, ensuring universal availability of a wide range of free-to-air services. Arqiva holds two of the three national commercial DTT multiplex licences, operates two national commercial digital radio multiplexes, and holds multiple DAB local radio multiplex licences.

Arqiva also operates over 80 ground satellite dishes for Direct-to-Home (DTH) TV and is the UK's largest independent reseller of satellite capacity, with a growing market share in Low Earth Orbit (LEO) up-linking.

We are dedicated to supporting and advancing the UK's broadcast industry, ensuring that our customers can deliver their content to audiences wherever they are and however they choose to watch or listen – with services meeting the highest standards for reliability, security, and user experience.

Response

Arqiva welcomes Ofcom's consultation on proposed updates to its guidance for assessing changes to the BBC's public service activities. As the UK's leading transmission provider of DTT and radio broadcast, we support the amendments set out and recognise Ofcom's long-standing objective of ensuring regulation remains proportionate, flexible and fit for a rapidly evolving media landscape.

However, in supporting these changes, Arqiva considers it important that the application of the revised guidance continues to capture any impacts on the way people interact with the BBC, including how viewers and listeners access its services and the unique, curated content the BBC provides. Any proposed changes must therefore be subject to appropriate scrutiny, particularly where they involve the withdrawal, dilution or reconfiguration of services that audiences rely upon.

The BBC's purpose is to deliver outstanding value to all audiences as a universal public service. In doing so, it makes a unique and invaluable contribution to the UK's national life through the provision of impartial news and information, support for learning for people of all ages, the showcasing of high-quality and distinctive content, and the representation and service of the diverse communities of the UK's nations and regions, while supporting the wider creative economy.

The guarantee of universal access to the BBC's programmes and services, as set out in the BBC's Royal Charter and Framework Agreement, is particularly important for audiences who rely on free-to-air television, often via DTT, and radio services. This includes, in particular, older citizens, those living with disabilities, people in rural and remote communities, and lower-income households.

Any changes to the BBC's public service activities should therefore be considered through the lens of these core principles, including where proposals may alter the role of free-to-air services or change the balance between broadcast and online delivery, alongside impacts on content and service markets. This includes changes that affect coverage, availability or prominence, as well as decisions to prioritise online-only content at the expense of availability via broadcast platforms.

Changes that materially affect the scale, scope or effectiveness of the BBC's universality in favour of internet-based services may carry access and resilience implications, even where the BBC's primary assessment is framed in terms of content delivery or audience consumption. Arqiva would welcome

continued clarity that such impacts remain firmly within the scope of Ofcom's materiality assessments where they may give rise to a significant adverse impact on fair access and effective competition.

Arqiva recognises that the market is evolving and that the BBC must continue to adapt in order to fulfil its public purposes. However, this reinforces the importance of strong and appropriate oversight to ensure that the BBC continues to meet its obligations under the Charter and supports the wider UK media and creative economy. The right processes, supported by effective regulatory scrutiny, are therefore essential.

We would therefore encourage Ofcom, when exercising its discretion under the updated framework, to remain alert to the potential cumulative impact of a series of incremental changes. While individual changes may appear limited when considered in isolation, their combined effect over time may have material consequences for universality, platform sustainability or market dynamics. There remains a clear need for careful consideration and scrutiny, and continued sensitivity to cumulative effects will help ensure that the revised framework delivers flexibility without unintended long-term consequences.

Arqiva agrees that effective and meaningful BBC engagement with stakeholders should be a central factor in Ofcom's decision-making. At the same time, we note that some impacts may be indirect and not always fully captured through BBC-led engagement alone. In such circumstances, Ofcom's independent judgement and ability to test assumptions remains an important safeguard within the revised framework.