



## **SUBMISSION BY CHANNEL 5 BROADCASTING LTD TO OFCOM CALL FOR INPUTS ON MANAGING THE EFFECTS OF 700 MHz CLEARANCE**

Channel 5 welcomes the opportunity to respond to this call for inputs. As we are not a multiplex operator we do not have access to technical data that would enable us to answer all of Ofcom's questions. But we do have strong views on the importance of the DTT platform and how the clearance programme should be managed.

We are confident the 700 MHz clearance programme can be sensibly managed, especially in light of the experience gained during digital switchover (DSO) and the 800 MHz clearance programme.

In planning the clearance programme, the greatest priority should be maintenance of confidence in the platform for the tens of millions of viewers who depend on it for viewing on both primary and secondary television sets. The DTT platform is of critical importance for public service broadcasting. For example, Channel 5 has eight channels<sup>1</sup> broadcasting on DTT; it is the platform on which our channels are watched most and which is of greatest commercial benefit to us.

We believe it is important for there to be a coherent and well resourced support and communications plan. Digital UK has proved itself an effective platform management body, as well as having past experience of DSO and 800 MHz clearance, so we would expect it to have the lead role in managing the programme. The programme itself needs to be properly resourced by government; the clearance programme is taking place to facilitate long-term economic benefits that will accrue to the mobile operators and the wider economy, not to DTT viewers, so the costs of it should be met from the public purse.

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<sup>1</sup> Channel 5 and Channel 5 HD on PSB muxes; Channel 5+1, Channel 5+24, 5USA, 5STAR, and Spike on COM muxes; and 5USA+1 on one of the interim muxes.

In the remainder of this submission we answer those questions on which we have views. We have not attempted to answer questions where we do not have data or other knowledge.

*Question 2: Do you any comments on how viewers will find the retuning process and whether there are particular groups of viewers which will require greater consideration/assistance with the process? What help might they need?*

Most DTT viewers are used to retuning their TV receivers; indeed, many sets retune automatically. However, there needs to be a comprehensive communications plan so viewers know in advance that retuning will be happening and to forewarn those who may encounter difficulties.

Among those who may require additional assistance are those who may lose reception of some or all their channels; those who need to retune manually and find this problematic; and those who require aerials to be replaced or repointed.

*Question 5: Do you have any evidence as to what proportion of viewers may struggle to bear the cost of an aerial replacement?*

We question why a householder whose aerial is working adequately before clearance should be forced to pay out of his/her own pocket for a new aerial in order to continue receiving exactly the same services. This scenario is different to DSO, when some viewers had to replace aerials but received a much greater choice of channels as a consequence.

*Question 8: Do you have any evidence as to what proportion of viewers may struggle to bear the cost of an aerial repoint or platform change?*

As with aerial replacements, we see no good reason why viewers should pay for the repointing of their aerials purely as a consequence of the clearance programme from which they will receive no benefit.

In the rare cases when viewers will no longer be able to receive DTT signals and have to move to another platform, we think there is an unanswerable case for the costs of new receiving equipment to be met from public funds. Such viewers will have invested in DTT equipment, quite possibly at the time of DSO, in the very reasonable belief that this would enable them to receive Freeview channels for as long as they are broadcast. There can be no good reason for them to have to undertake the costs of purchasing alternative reception equipment through some quirk of geography while virtually all other DTT viewers are unaffected.

*Question 10: Are there any other elements a viewer information campaign would need to include? Do you have any comments on or further evidence to inform the above estimates of the cost of providing information and advice to viewers? Please provide supporting evidence for any adjustments that you think may be relevant.*

The most effective form of communications will be for broadcasters themselves to provide on-screen messages from several weeks in advance of retuning events. But such messaging needs to be delivered as the major part of an overarching communications plan.

Such a plan needs to be properly planned and resourced. It must include all the elements identified by Ofcom – a comprehensive website, a properly resourced advice line, specific help for vulnerable groups – and be supported by briefings to local media, aerial installers, councils, MPs and other significant stakeholders.

In addition, for those areas where particular problems can be anticipated, there should be more focused activity including paid-for advertising and test signals ahead of clearance.

*Question 13: Do you have any additional information to further inform our cost estimates and assumptions of the effectiveness for the different triage methods? Are there any other triage methods which should be considered? Please provide supporting evidence for any adjustments you think may be relevant to our current estimates.*

We recognise the need for an effective triage system so that help is concentrated on those who encounter difficulties as a result of clearance. We suggest that a mixture of the three approaches could be employed.

*Channel 5 Broadcasting Ltd*

*May 2016*