

## 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>	Comux UK Ltd
<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 / Your name / Organisation name / Whole response / Part of the response (you will need to indicate which question responses are confidential)
<b>Your response: Please indicate how much of your response you want to keep confidential. Delete as appropriate.</b>	None
<b>For confidential responses, can Ofcom publish a reference to the contents of your response?</b>	Yes

## 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>	3. Many media companies and stakeholders have commented on the fact that audience viewing behaviours are changing. However, the proportion of audiences that are predicted to still watch broadcast content is anticipated to remain at high levels for some time to come, especially for older or

more rural audiences. It is therefore important to protect traditional DTT broadcasting for these audiences who will continue to rely on linear services.

4. Broadcast services provide a diverse range of perspectives, information and entertainment to the public. DTT broadcast media is accessible to all members of society, regardless of income or location, and therefore has a unique role in shaping public discourse and facilitating informed decision-making.
5. The government should also continue to recognise the important role that local TV plays in supporting communities in the UK. Local TV can provide crucial, specific information to local communities regarding access to public services and can disseminate important information to communities that might not otherwise be able to access the information.
6. For example, during the pandemic, some local television services broadcasted hyper-local information about the locations of covid vaccine clinics and disseminated public health information about the importance of staying active during lockdowns. We fear that, for some audiences who rely on traditional broadcasting for information about their local area, they might be disadvantaged if the rapid move towards internet protocol TV takes precedence over preserving broadcasting television.

**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?**

7. For the local TV sector, one of the key decision points will be the government's recommendations to Ofcom regarding the licence renewal process for local TV licences, due to end in November 2025. The local TV sector recently underwent a consultation, conducted by the Department for Culture, Media and Sport, into the scope of the licence renewal process and the future of local television. We are currently awaiting the government's recommendations to Ofcom as informed by the consultation.

8. The government's recommendations will be crucial to how we plan for the next term of Ofcom licences, and how and whether we invest in the necessary technologies to enable local TV services to stream its content to IP platforms.

9. Our colleagues at the Local TV Network (LTVN) are also calling for local television services to be brought into the Media Bill's framework - otherwise they argue that the crucial prominence that services currently receive on DTT electronic programme guides may not carry over to IP platforms.

**Q3. How do broadband networks and supporting infrastructure need to evolve to support resilient delivery of TV over the internet in the future?**

**Q4. In what ways might different types of 'hybrid' terrestrial and internet services deliver benefits for audiences and what risks may arise?**

10. Hybrid terrestrial platforms can pose some risks, especially where some traditional channels are left behind. For example, Everyone TV has proposed that channel numbers will change for local TV on their new Freely platform. At the moment, local TV channels can be found via channels 7 and 8 on Freeview, but in the future, could be found on channels 8 and 9 on Freely. This could be confusing for audiences, and the relegation of content to a lower ranking

	<p>could impact the income that local TV channels are able to generate from advertising, adding more strain to the local TV industry.</p> <p>11. Another important challenge for the local TV sector is not knowing the speed and pace of the migration to IP-based and smart TV viewing and how possible changes to the ecosystem will affect the broadcast sector. Comux recently commissioned an independent review of the DTT market in the next licence phase, and there is clear evidence that although IP-based viewing will increase, traditional DTT linear viewing will continue well into the 2030s. But, the precise speed and extent of the IP migration is unknown, and this affects the accuracy of our investment planning and revenue forecasts.</p>
<p><b>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)?</b></p>	<p>12. As mentioned above, we believe the proportion of audiences that are predicted to still watch broadcast content on DTT is anticipated to remain at high levels for some time to come, especially for older or more rural audiences. It is therefore important to protect traditional DTT broadcasting for these audiences who will continue to rely on linear services.</p>
<p><b>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?</b></p>	<p>13. We believe that local TV and the public service function it delivers plays an important role in the UK media landscape. As mentioned above, the local TV sector was recently the subject of a government consultation as it sought views on the proposed process for licence renewal and the future of local TV. As part of our response to that consultation, we outlined some of the key benefits the local TV offers. Points 14-16 summarises some of the points we made in our response.</p> <p>14. We believe that there is the opportunity for local TV, with Comux's support, to continue</p>

to provide clear benefits to local communities and the UK media industry.

15. In our view, the main opportunities provided by the local TV sector are as follows:

- a. Local Content: We believe that there is a clear role in the future for local TV to continue to provide interesting, relevant and watchable content for local communities.
- b. Community Benefits: As the DCMS consultation recognises, local TV can continue to provide an invaluable service in bringing local communities together.
- c. Media Plurality: We think that in the coming years, there will also be the opportunity for the local TV sector to continue to help develop and maintain media plurality in local areas.
- d. Training and Work Experience: And we believe that there is the enormously beneficial opportunity for local TV to carry on providing employment, training and development for broadcast journalists and television production staff. The sector boasts a diverse pool of staff across the UK and provides valuable hands-on experience and training in areas such as journalism, video journalism, video editing, scheduling, general TV production skills, and studio and control room work.

16. We are proud of the work that Comux has done over the past 10 years in supporting the local TV sector, technically, financially and practically. We are looking forward to the opportunity to continue to support local TV in the next licence period.

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