making communications work for everyone

Call for Evidence response form

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Title	Call for evidence: Future of TV Distribution
Full name	[redacted]
Contact phone number	[redacted]
Representing (delete as appropriate)	Organisation
Organisation name	Digital Mobile Spectrum Limited
Email address	[redacted]

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.

Your details: We will keep your contact number and email address confidential. Is there anything else you want to keep confidential? Delete as appropriate.	Digital Mobile Spectrum Limited (DMSL) is a joint venture owned by the four UK mobile operators (BT, Three, Vodafone and Virgin Media O2). The organisation was created to support viewers whose free to view television was interrupted by the launch of new mobile services on the 800 MHz spectrum. Since launch, our work has expanded to include: - TV interference caused by mobile services on 700 MHz spectrum - Viewers impacted by 700 MHz clearance - Oversee and manage grant funding for the publicly funded elements of the Shared Rural Network - Support the restoration of DTT services following the Bilsdale transmitter fire, with a particular focus on vulnerable viewers. - Support the transition of BBC Freesat services from SD & HD to solely HD for vulnerable viewers

	The majority of our work is conducted under the Restore TV brand (formerly at800). Under this programme, our work includes: - Proactively contacting viewers who may be impacted by new mobile services to inform them of the free support available - Maintaining a website, including web form, where viewers can check their eligibility and if eligible order a free filter to resolve the TV interference - Providing a contact centre to provide viewers with free support to resolve TV interference - Providing free in home engineer visits for eligible viewers who are unable to resolve TV interference without assistance The nature of the work means we interact with a high proportion of free-to-air TV viewers who could be considered vulnerable or needing additional assistance. Our responses to this consultation are based on our experience of interacting with these viewers over a 10 year period.
Your response: Please indicate how much of your response you want to keep confidential. Delete as appropriate.	None
For confidential responses, can Ofcom publish a reference to the contents of your response?	N/A

Your response

Question	Your response
Q1. How are audience demands and expectations evolving, and how does that vary for users of different TV platforms and different demographics?	Confidential? – N We conduct Customer Satisfaction Surveys to assess the quality of our work and ensure we are meeting viewers' needs. Our data has

	shown a steady proportion of viewers who only have access to TV through an aerial. However, the proportion of older age groups who only have access to TV through an aerial has risen. In 2021 we surveyed 1,249 viewers about their TV service - 87% only had access to TV through an aerial, dropping to 79% of viewers over 75 and 84.5% of viewers over 65. In 2023 (data to 31 October) we have surveyed 1,300 viewers. 87% only had access to TV through an aerial, rising to 83% of viewers over 75 and 85% of viewers over 65. Our data is backed up by a 2023 report by Silver Voices, which found: - 77% of respondents reported watching TV through Freeview weekly - 71% of respondents aged 65+ watch Freeview TV on a daily basis - 51% of over 65s said broadcast TV via Freeview was ‘essential’ or ‘very important’ to them on a daily basis - 57% of respondents living with a disability said they watch Freeview every day. 22% said watching TV via Freeview was 'essential' to their everyday life Our own data, supported by external sources, tells us that a significant proportion of people remain reliant on TV through an aerial and this cohort are more likely than the general population to need additional support with any technology changes.
~~**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?**~~	
~~**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?	As per the response to question 1, there remains a proportion of viewers reliant on TV through an aerial, and these are likely to be in the older age groups. In May 2023, Citizens Advice reported a million people had disconnected their broadband in the last 12 months to cut costs. The Silver Voices Report referenced, found that: - 64% of respondents said they are currently struggling to afford broadband. 14% of respondents aged 18-25 said they did not have access to broadband at home. - 53% of respondents anticipate struggling to afford the subscriptions for online TV and radio services in 15 years' time. - 50% of respondents didn't want the expense of having to buy new equipment, viewing it as unnecessary. - Even when thinking about the next 15 years, almost half (46%) anticipated costs of broadband would be a key barrier to accessing TV and radio services. - 46% of low income respondents earning (those earning between £5-10k p/a) have access to streaming or on-demand services, but 68% agreed they had good access to affordable TV services Similarly, the Good Things Foundation Digital Nation 2023 found that 2.5m UK households struggle to afford fixed broadband. This supports our anecdotal evidence that people are unlikely to invest in renewing their TV and aerial equipment. These are seen as a one off cost, in contrast to monthly subscriptions for broadband and paid TV services. From this data, we can extrapolate that there is (and is likely to continue to be) a group of financially vulnerable viewers who are reliant on free to view TV without internet connectivity.

	Affordability is not the only issue faced by viewers. Access and skills remain a challenge. The Good Things Foundation Digital Nation 2023 found that: - 10.2m people in the UK lack the most basic digital skills - 1 in 14 UK households have no home internet access - non-internet users are twice as likely to have a disability or health condition and are 12 times more likely to be over 65 The Silver Voices Report found that: - In Wales, 83% of respondents noted that the signal quality and reliability of connection was better on broadcast TV than watching online - slow internet was cited as the largest source of frustration when attempting to access TV and radio content online (43%). Access and skills are an important consideration for any technological change to TV distribution. Combined, this data tells us that without targeted support, specifically able to support vulnerable viewers, any significant change to how TV is delivered to homes risks leaving groups without a source of information and entertainment on which they rely.
~~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)?~~	
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?	Our decade of experience serving viewers who watch TV through an aerial has made clear: - The importance of simplicity, particularly for vulnerable viewers - this applies both to the service and how it is accessed, as well as any products provided - The need for all stakeholders to work together with a shared goal to achieve change of magnitude - The power of a central, well communicated, independent help scheme that reduces the risk of people

	falling victim to bad actors and confusion or fear of being upsold unnecessary services Any transition should consider: - how information on existing social tariff users can be shared compliantly, safely and securely - the potential to make available TV-only social broadband tariffs for vulnerable groups who may otherwise lose the ability to receive free-to-air television (while cognisant of net neutrality challenges) - how content providers can continue - as now - to fund the medium of delivery despite current business models where IP networks are primarily funded by end users

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