

Call for Evidence response form

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FutureofTVDistributionCallforEvidence@ofcom.org.uk

Title	Call for evidence: Future of TV Distribution
Full name	✂
Contact phone number	✂
Representing (delete as appropriate)	Organisation
Organisation name	The Local TV Network
Email address	✂

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.	Nothing / Your name / Organisation name / Whole response / Part of the response (you will need to indicate which question responses are confidential)
Your response: Please indicate how much of your response you want to keep confidential. Delete as appropriate.	None / Whole response / Part of the response (you will need to indicate below which question responses are confidential)
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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? – Y / N The LTVN believes that the consultation document gives a fair summary of ways in which audience habits are changing. However, we would caution that the proportion of audiences that are predicted to still watch broadcast content

on linear channels is likely to remain at high levels for the next few years, especially for older or more rural audiences and in areas with poor broadband connection. Enders Analysis shows that by 2034, nearly 20 billion hours of TV will be viewed in DTT homes (just 20% less than today). It is therefore important to protect traditional DTT broadcasting for these audiences.

Audiences will also want to continue to be able to access trusted content, in an environment where doing so reliably is becoming increasingly difficult. The challenges are particularly acute in respect of local TV.

Local TV services can be important part of the overall media ecosystem:

- They increase the diversity of perspectives, information, and entertainment available to the public. Information available on local TV adds to plurality and has a granularity that public service broadcasters cannot match.
- They support identity. With pride in place being increasingly important, they provide local information, encourage civic engagement and add to local accountability;
- They can provide crucial information to local communities relevant to local public services: during the pandemic, some services were able to provide information about the locations of covid vaccine clinics and disseminated public health information;

- They can discover and bring on talent. Local TV services have a strong record in developing journalistic and other media skills.

Local TV is at the same time only a small player. The local voice is increasingly at risk not only from within the UK but also from international companies and platform manufacturers. In a world in which even the main PSBs face increasing competition, this local voice can only continue to thrive if there is a robust regulatory regime that recognises that support has to be given to it, as a legitimate part of the overall broadcasting environment.

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?

LTVN notes the next key decision point for the local TV sector will be the outcome of the recent government consultation on Local TV licence renewal. It is crucial that the renewal process should be as light touch and expeditious as possible in order to enable the sector to provide continuity of service over the next DTT licence period from 2025 to 2034.

Although the LTVN believes that DTT will continue to be important beyond 2034 (the date until when traditional services are guaranteed) the commercial income available from advertising is clearly set to decline. So local TV will need to find new sources of income. One crucial issue therefore will be that Local TV needs to be brought within the framework of the Media Bill both to ensure carriage on future platforms and to ensure ease of discoverability. Unless the Government does so, local public service content will disappear.

	<p>Also relevant, is whether the government wishes to have the ability to make use of local TV, should it choose to do so. While there was some government advertising on local TV services during the pandemic, there is potentially scope for a far greater amount of public service messaging.</p> <p>Moreover, LTVN noted that at the Committee stage of the Media Bill, the Minister of State, DCMS, drew attention to the clause that would enable financial support for community radio, suggesting that this would be useful in future circumstances, such as another pandemic. While the LTVN is not seeking financial support for the sector, it does believe there should be a level playing field as between community radio and community TV. It also suggests that over a period of possibly decades in which the current Media Bill will be the primary legislative framework for TV, circumstances might arise in which a future government might wish to work with local TV, as well as local radio, in helping to deliver programming that meets wider government objectives.</p>
<p>Q3. How do broadband networks and supporting infrastructure need to evolve to support resilient delivery of TV over the internet in the future?</p>	<p>No comment</p>
<p>Q4. In what ways might different types of 'hybrid' terrestrial and internet services deliver benefits for audiences and what risks may arise?</p>	<p>Hybrid terrestrial platforms can pose some risks, especially where some traditional channels are left behind. Some proposals that have been published recently, for example, Everyone TV's new platform "Freely", largely repackages existing technology but in a way that could be confusing to viewers. At the moment, local TV channels can be found via channels 7 and 8, but in the future, could be found on channels 8 and 9.</p>

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)?

No comment.

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?

LTVN has noted that the Government White Paper, 'Up Next', referred to the benefits of increased collaboration and would strongly support moves in this direction.

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