

Your response

Question	Your response
Question 1: Do you agree with our proposed principles and methods for assessing the number of UK users of a TSS?	Confidential? – Y / N
Question 2: Do you agree with our proposed principles and methods for assessing whether the number of UK users of a TSS is significant?	<p>Confidential? – N</p> <p>The assessment of whether the number of UK users of a TSS is significant has potentially major commercial implications for that TSS. There are two important points to consider:</p> <ul style="list-style-type: none"> - Only RTSS's will be covered by the "must offer/must carry" obligation. - It is not viable to offer TV receivers in the UK market if they do not have access to PSB IP services (as offered through the DIPS). <p>If DIPS are only guaranteed to be offered on RTSS's, there is a danger that the TV receiver market is essentially closed to new entrants, because of the "chicken and egg" situation that:</p> <ul style="list-style-type: none"> - Without access to the DIPS, new TSS's can never achieve sufficient scale to be considered significant - Unless the TSS is considered significant, it will never benefit from the "must offer/must carry" regime and get access to DIPS. <p>While designation as an RTSS imposes responsibilities in terms of prominence, it also brings significant benefits in terms of access to market-critical services under reasonable terms and conditions.</p> <p>We recognise that it is not viable for DIPS to adapt their services to every TSS that enters the market, however (initially) small. Designating every TSS as an RTSS even if it has a low number of users – bearing in mind that a new entrant to the market will initially have zero users – would impose a disproportionate burden on DIPS.</p>

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	<p>The way around this problem is to ensure that DIPS are offered based on technical standards agreed by the industry, and that DIPS are available to any TSS that complies with those standards under the same terms that are available to an RTSS (which can include the same prominence requirements). This enables new entrants to enter the UK TV device market, without increasing costs to UK PSBs.</p> <p>The highly successful UK digital terrestrial television market operates in this horizontal manner, facilitated by organisations such as the Digital Television Group (DTG), and we believe it is an important principle to take forward into the IP world. It will promote competition amongst TSS's and devices, and maximise the availability of PSB services, with appropriate prominence, across all kinds of new and innovative devices and platforms.</p> <p>Without some consideration of making DIPS available to new and smaller platforms, competition in the UK market will be significantly and increasingly reduced, resulting in higher prices and less choice for consumers.</p> <p>Furthermore, it is also important that any consideration of what constitutes a "significant number of users" also considers future growth potential.</p>
Question 3: Do you agree with our proposed principles and methods for assessing the manner of use of a TSS?	Confidential? – Y / N
Question 4: Do you agree with our proposed principles and methods for advising on the functions that a TSS is capable of carrying out, or may be made capable of carrying out?	Confidential? – Y / N
Question 5: Do you agree with our proposed principles and methods for assessing any other additional matters?	Confidential? – Y / N

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<p>Supplemental Question 1: We welcome views on this potential use of ‘number of TSS installed on ITE devices in UK homes’ as a proxy, and on the potential use of an absolute number of UK users when setting a threshold for significant use in our first report setting out our recommendations on designation of TSS. Please provide evidence to support your views.</p>	<p>Confidential? – Y / N</p>
<p>Supplemental Question 2: We welcome views on this potential approach to assessing the manner of use of a TSS for our first report setting out our recommendations on designation of TSS. Please provide evidence to support your views.</p>	<p>Confidential? – Y / N</p>
<p>Supplemental Question 3: We welcome views and supporting evidence for our first report setting out our recommendations on designation of TSS on:</p> <ul style="list-style-type: none"> • The number of people using older versions of TSS that are no longer supported by their provider; • When TSS providers release a new version of their service, for how long do they normally support it? • When IPS providers release a new version of their service, for how long do they normally support it? • The technical limitations and/or costs that are associated with supporting older versions of TSS and older versions of IPS still available in the market. 	<p>Confidential? – Y /</p>