

# Consultation response form

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Consultation title	Ofcom's proposed Plan of Work
Full name	[X]
Contact phone number	[X]
Representing (delete as appropriate)	Organisation
Organisation name	Local Television Network and Comux
Email address	[X]

## Your response

Question	Your response
Question 1: Do you have any comments on Ofcom's proposed Plan of Work 2024/25?	Confidential? – N

### Introduction to Comux and the Local Television Network (LTVN)

1. Comux UK Ltd ("**Comux**") is the multiplex and technical transmission operator for the 34 local digital television programme ("**local TV**") services and is co-owned by the local TV licensees. It was established in 2012 to apply for the licence to operate the digital terrestrial television ("**DTT**") multiplex on behalf of the local TV sector.
2. Local Television Network Limited ("**LTVN**") is the industry body for local TV services established under the Local Digital Television Programme Services Order 2012 (the "**2012 Order**").
3. Local TV brings public service local content to towns and cities of all sizes. It enhances media diversity, in a number of locations being the only regular source of truly local news on broadcast TV. Local TV services offer an extra tier of local journalism, address local issues, cover the activities of local decision-makers, promote community action and trumpet local success stories.
4. In this response document, Comux and the 34 local TV licensees are described as "**the local TV sector**" or the "**Sector**".

### Our comments on Ofcom's proposed plan of work

#### Local TV renewal/relicensing

1. The local TV sector welcomes Ofcom's commitment to working with DCMS following the completion of its consultation on the future of the local TV sector and licenses. We were encouraged by the government's positive approach to the future of local TV, and its acknowledgment of the important role that the sector plays in the communities it serves.
2. We note that in its response to the Consultation on the renewal of local TV licenses, published on 2 February, the Government intends to make an order to allow the conditional renewal of the local TV multiplex licence and the conditional renewal of the 34 individual local TV service licenses. The renewal process will be administered by Ofcom in accordance with the requirements of the order.
3. We urge that Ofcom should do everything possible to prepare for the order, in particular in establishing a light touch and rapid process. The sector would want to know as soon as possible the criteria against which it is to be judged and what will happen if individual licensees are judged not to meet the conditions. We would ask that we should be consulted during the process of Ofcom's policy development.
4. The proposed timescale by DCMS of end-2024 risks being commercially damaging for both Comux and many local TV operators, given that licences are due to expire in 2025. The sector would therefore welcome a commitment from Ofcom that the renewal process will be expedited to provide much needed clarity and stability for both the multiplex operator and individual licensees.
5. Further, the sector would welcome clarity regarding sequencing and conditions for the renewal process, in line with government's preferred approach. It is important that Ofcom is empowered to maintain the core character of local TV services, whilst granting it flexibility to agree reasonable updates to operational detail where it deems these to serve the interests of viewers in the new licence term.
6. The sector looks forward to working with Ofcom to ensure that conditions are fair and proportionate for both the multiplex operator and individual licensees and urges both the Government and Ofcom to expedite the process and provide reassurance for the future of the sector.

### **Local Media Review**

7. The sector welcomes Ofcom's commitment to undertaking a wide-ranging review of the local media market in the UK, including television. The way that local media is produced and consumed continues to be subject to change, and the sector is committed to meeting audience needs by continuing to adapt in light of these changes.
8. Local TV services collectively deliver local content commitments amounting to about 25,000 hours of output a year. They represent an important aspect of local media, supporting both their communities and the wider ecosystem, through training and development.
9. At the heart of local TV's service is local news. Each year, local TV operators deliver several thousand audio-visual news stories on screen, produced by dozens of journalists across the country. A high proportion of operating budgets are devoted to local news gathering and production. Many viewers place their trust in local TV news because it provides a voice to the community and is not metropolitan-centric. Local TV is therefore a key part of Ofcom's key priority of delivering media we trust and value.
10. The sector welcomes this wide-ranging review, and Ofcom's acknowledgment of the importance of local media. We look forward to engaging actively with the review and hope that Ofcom will engage with the sector in any ongoing research, in terms of what audiences need and want from local media, and how these are being met within the local TV sector across the nations and regions in the UK. It is important that the review should not be constrained by the

limits imposed by certain regulatory boundaries. Among the issues that we would hope could be included would be:

- a. The demarcation between local and regional content;
- b. Access by local TV to footage of major events and public interest events (such as Crown Courts); and
- c. Funding for local journalism.

### **Media Bill**

11. The LTVN welcomes the Bill's over-arching aim to reform the public broadcasting framework for the digital age, however, as currently drafted, we are concerned that the Bill does not include local TV. This omission will jeopardise the sector's ability to transition to an internet-delivered future while still maintaining terrestrial services.
12. We note that the work plan refers to the publication of a roadmap to outline how and when Ofcom would implement the changes, depending on the Bill's progress. We would like to register that as part of this progress, the LTVN would wish to see an amendment that would bring local TV within the remit of the Bill's provisions, subject to a determination by Ofcom. Should such an amendment be passed, we would hope that consideration of the implications could be included in this year's workplan.