

Consultation response form

Your response

Question	Your response
<p>Question 1: Do you agree with our proposals that the main five PSB channels hold the top five slots on EPGs provided UK wide or in the UK outside of Wales?</p>	<p>Not Confidential</p> <p>No Comment</p>
<p>Question 2: Do you agree that on EPGs provided for viewers specifically in Wales BBC One, BBC Two and the relevant Channel 3 service should take the top three slots, with S4C in slot four, Channel 5 in slot five and Channel 4 guaranteed a position on the first page?</p>	<p>Not Confidential</p> <p>No Comment</p>
<p>Question 3: Do you agree that BBC Four should be guaranteed a slot within the top three pages of all EPGs?</p>	<p>Not Confidential</p> <p>No Comment</p>
<p>Question 4: Do you agree that the designated public service News channels (currently BBC News and BBC Parliament) should be guaranteed slots on the first page of the news genre section or an equivalent position within the grouping of news channels on the EPG, as applicable?</p>	<p>Not Confidential</p> <p>No Comment</p>

Question 5: Do you agree that CBeebies and CBBC should have guaranteed slots on the first page of the Children's genre or area of the EPG, as applicable?

Not Confidential

No Comment

Question 6: Do you agree that S4C, BBC Alba, and BBC Scotland should be guaranteed prominence within the first three pages of UK wide EPGs?

Not Confidential

No Comment

Question 7: Do you agree that Local TV should be guaranteed prominence within the first three pages of UK wide EPGs?

Not Confidential

No Comment

Question 8: Do you agree that S4C, BBC Alba, and BBC Scotland should be guaranteed prominence within the first three pages of relevant Nation specific EPGs e.g. S4C in Wales, BBC Alba and BBC Scotland in Scotland?

Not Confidential

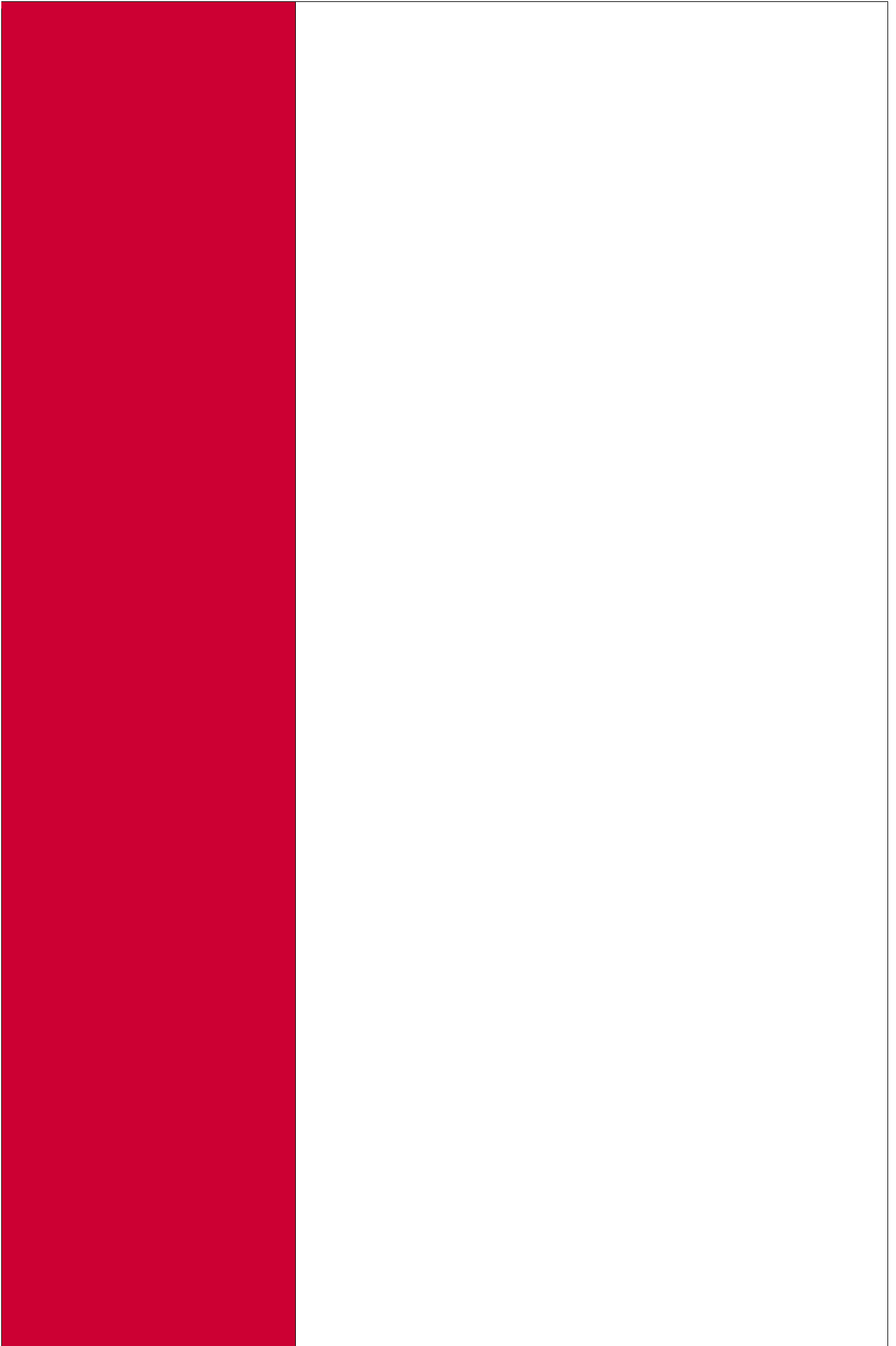
Yes, as S4C, BBC Alba, and BBC Scotland are entrusted with producing and broadcasting programmes which are relevant to the distinctive culture of Wales and Scotland respectively. RTÉ believes that RTÉ public service channels should similarly have appropriate prominence in Northern Ireland EPGs. RTE's public service remit in respect of its channels includes an obligation to be responsive to the interests and concerns of the whole community, to be mindful of the need for understanding and peace within the whole island of Ireland, to ensure that programmes reflect the varied elements which make up the culture of the people of the whole island of Ireland, and to have programme schedules that reflect the cultural diversity of the whole island of Ireland.

In 2018, the Broadcasting Authority of Ireland conducted a survey to understand the views and opinions of audiences to public service broadcasting on the Island of Ireland. Northern Ireland respondents felt RTÉ differentiates itself in relation to the provision of Irish sporting and cultural programmes, new programmes made on the island of Ireland and promoting the arts in Ireland. (*B & A Audience Tracking Research – August 2018, Please note that the number of people surveyed for this question was relatively small.*)

The importance of the unique and diverse cultural and linguistic identities that exist on the island of Ireland was recognised in the Good Friday Agreement of 1998 and the 2006 St Andrews Agreement. In the 2010 Memorandum of Understanding between the UK and Ireland regarding the provision of digital television services in Northern Ireland and Ireland it was recognised '*public service broadcasting supplied from both jurisdictions has a long recognised role to play throughout the island of Ireland in promoting cultural diversity, in providing educational programming, in objectively informing public opinion, in guaranteeing pluralism and in supplying quality entertainment.*'

Whilst the importance of providing Irish Public Service broadcasting to an audience within Northern Ireland is recognised by the both Governments, suitable parameters to ensure adequate prominence and discoverability are absent. RTÉ channels in Northern Ireland can be found on Channel 52 and 53 on Freeview, channel 161 and 162 on SKY and channel 875 and 876 on Virgin. The 2017 OFCOM Communications Report on Northern Ireland highlighted only one in four (19%) surveyed watched RTÉ One every week. A significant contributing factor to this low viewership of RTÉ channels is their listing on television platforms EPG in Northern Ireland.

RTÉ is mindful that its public service channels are not designated under the Communications Act, 2003 (as amended). RTÉ requests OFCOM give consideration to the designation in the Code of RTÉ's linear public service television channels as channels to be given "appropriate prominence" in Northern Ireland region EPG and to how such designation could be achieved.



<p>Question 9: Do you agree that Local TV should be guaranteed prominence within the first three pages of relevant regionalised EPGs?</p>	<p>Not Confidential</p> <p>No Comment</p>
<p>Question 10: Do you agree with our proposals to ensure prominence for either the SD or HD version of BBC channels rather than both?</p>	<p>Not Confidential</p> <p>No Comment</p>
<p>Question 11: Do you agree with our proposals to allow broadcasters to swap HD simulcast variants of their SD designated channels, such that those HD variants could occupy the slots which the SD channels would be entitled to?</p>	<p>Not Confidential</p> <p>No Comment</p>
<p>Question 12: Do you agree with our proposal to provide a 12 month transition period once the Code is finalised?</p>	<p>Not Confidential</p> <p>No Comment</p>
<p>Question 13: Do you think that the prominence regime should be extended to ensure EPGs themselves can be easily found?</p>	<p>Not Confidential</p> <p>Yes. RTÉ recognises the importance of EPGs as a primary discovery User Interface (UI) for audiences to access Live channels. Ensuring the lives channels are easily discoverable via UIs in a new prominence regime, would allow audiences access Live Channels easily.</p>

<p>Question 14: Do you agree with the broad range of factors for consideration we have identified? Are there other factors that policy makers should consider?</p>	<p>Not Confidential</p> <p>No comment</p>
<p>Question 15: Do you agree with the principles we have set out? Are there other principles that should be considered?</p>	<p>Not Confidential</p> <p>No comment</p>
<p>Question 16: Do you think that the prominence regime should be extended to ensure PSB Players can be easily found?</p>	<p>Not Confidential</p> <p>RTÉ supports proposals to ensure Public Service Content, via PSB Players, is easily discoverable on User Interfaces.</p>
<p>Question 17: Do you think that the prominence regime should be extended to ensure PSB content can be easily found via recommendations and / or search? If so, what key parameters would you set for this aspect of the regime?</p>	<p>Not Confidential</p> <p>As recommendation algorithms and editorially curate content discovery UIs become more important routes for content discovery, RTÉ supports proposals for platforms to be transparent in how these UIs operate to ensure PSB content is easily discoverable.</p>
<p>Question 18: Do you think that the prominence regime should be extended to platforms and devices not currently captured by the EPG prominence regime? If so, how do you think the regime could be extended and who should be captured?</p>	<p>Not Confidential</p> <p>RTÉ supports proposals that recognise the importance of Public Service Content being easily discoverable via UIs in a multi-platform/device landscape.</p>

Question 19: Do you think that the prominence regime should be extended to online services? If so, who should be captured?

Not Confidential

RTÉ supports proposals to ensure Public Service Content is easily discoverability on online services because it is in the interest of media pluralism, freedom of speech and cultural diversity.