

Ofcom Call for Evidence: Listed Events – Implementing the Media Act

Arqiva welcomes the opportunity to respond to Ofcom’s call for evidence, *Listed Events: Implementing the Media Act*.

Arqiva is at the heart of the UK broadcast sector. We operate the digital terrestrial television network which provides universal, free-to-air coverage of news, entertainment, and live events, including major sporting occasions that bring people together such as the Euros, Olympics, and Paralympics. We also operate the UK’s broadcast radio network, and own and operate two commercial national radio multiplexes alongside multiple local DAB multiplexes. Further, we deliver a portfolio of managed media services that enable broadcasters to achieve scale and efficiency in managing and distributing content in a multi-platform world.

The listed events regime plays an important role in the broadcast regulatory framework, and has supported the universal availability of live coverage of sporting events of national interest. In implementing the new listed events regime brought by the Media Act 2024, it is essential that Ofcom continues to support the availability of live coverage for all viewers across the entire UK, recognising the critical role played by broadcast services alongside streaming services, particularly for audiences that are at higher risk of exclusion including lower-income audiences, people with a disability, and people living in rural areas. Ofcom should be conscious of and mitigate risks that could potentially result in listed events becoming less widely available to UK audiences.

In this response we highlight key evidence on UK audiences’ use of different platforms in today’s hybrid media environment, to support Ofcom’s developing approach to the new listed events regime.

The take-up and use of TV services to watch listed events

The UK’s hybrid media ecosystem offers a range of different services to viewers.

The digital terrestrial television (DTT) network is the backbone for free-to-view TV in the UK, reaching 98.5% of the population. Over half (56%) of adults in Great Britain watch TV through DTT¹, and the platform delivers a large share of total broadcast viewing hours in the UK, with Enders Analysis estimating DTT would deliver over 23 million hours of broadcast TV in 2024.²

The DTT platform is a primary platform for watching listed events. The service is accessible across the UK and highly reliable, with the broadcast network achieving over 99.9% network availability.³ Further, DTT doesn’t suffer from the network congestion and lag issues that impact internet streaming services during peak live viewing events such as live sports, which have a detrimental impact on the live TV viewing

¹ Ipsos, 2022, *The importance of Digital Terrestrial Television and Broadcast Radio*, https://www.arqiva.com/Importance_of_Broadcast.pdf

² Enders Analysis, 2022, *Leading the UK into digital*, <https://www.endersanalysis.com/reports/leading-uk-digital-dtt-switch-when>

³ Arqiva, 2023, *Annual Report and Financial Statements*, <https://www.arqiva.com/group-financial-results/2023/Arqiva-Group-Limited/AGL%20FY23%20Financial%20Statements.pdf>

experience. For these reasons, millions of households and other premises (e.g., local pubs) use DTT to watch sport and other live events that bring the nation together.

This is highlighted by viewing figures for live sporting events across broadcast and online streaming platforms:

- The BBC's Olympics coverage reached 29.7 million viewers through its linear channels.⁴
- England's Euro 2024 final defeat brought in a peak TV audience of 17.8 million on BBC One, with a TV audience share of 63%. It was streamed on BBC iPlayer and the BBC Sport website 7.6 million times.⁵
- The England Women's Euro 2022 win was watched by a peak BBC One television audience of 17.4 million, with 5.9 million streams via iPlayer and the BBC Sport website and app.⁶
- The 2024 Wimbledon men's singles final was watched by a peak audience of 7.5 million on BBC One. It was streamed live 3.3 million times on iPlayer and BBC Sport online. The women's singles final had a peak audience of 4.1 million on BBC One and was streamed 1.9 million times.⁷

Online streaming services are used by many, however viewing through these platforms is concentrated on on-demand programmes rather than live. Subscription streaming video-on-demand services (SVOD) take-up has plateaued with a reach of around 68% of UK households.⁸ Broadcaster video-on-demand (BVOD) services such as BBC's iPlayer and ITVX have increased their audience over recent years; however, linear broadcast channels continue to deliver the majority of viewing time. Ofcom's analysis found that the proportion of total broadcaster viewing coming from BVOD services was 13% in 2023 – with linear channels accounting for the majority, 87%, of viewing.⁹ Research from Enders Analysis looking specifically at PSB viewing time on TV sets concluded that in 2023, 28 million minutes of PSB viewing was delivered through BVOD platforms, compared to 1.88 billion minutes through linear broadcast channels.¹⁰

⁴ Broadcast Sport, 2024, *BBC Olympics TV coverage reaches 29.7m*, <https://www.broadcastnow.co.uk/broadcasting/bbc-olympics-tv-coverage-reaches-297m/5195863.article>

⁵ BBC, 2024, *England's Euros final loss watched by 19.3m across BBC*, <https://www.bbc.co.uk/sport/football/articles/c9wv74y7xj7o>

⁶ BBC, 2022, *Women's Euro 2022: Record global audience watched tournament in England*, <https://www.bbc.co.uk/sport/football/62735293#:~:text=Women's%20Euro%202022%3A%20Record%20global%20audience%20watched%20tournament%20in%20England,->

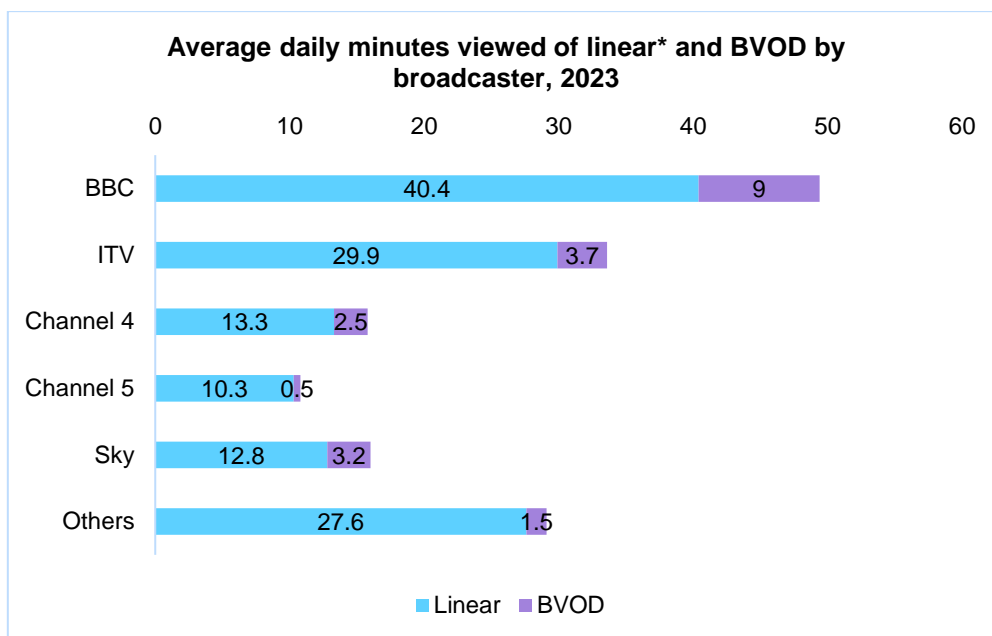
[Published&text=A%20record%20global%20audience%20of.Germany%20in%20the%20Wembley%20final](https://www.bbc.com/mediacentre/2024/audiences-flock-to-bbc-for-major-sport-finals-euros-wimbledon)

⁷ BBC, 2024, *Audiences flock to the BBC for Sunday's major sport finals with 19.3m tuning in for the Euros and 7.5m for Wimbledon*, <https://www.bbc.com/mediacentre/2024/audiences-flock-to-bbc-for-major-sport-finals-euros-wimbledon>

⁸ Ofcom, 2024, *Media Nations 2024*, <https://www.ofcom.org.uk/media-use-and-attitudes/media-habits-adults/media-nations-2024/>

⁹ Ofcom, 2024, *Media Nations 2024*, <https://www.ofcom.org.uk/media-use-and-attitudes/media-habits-adults/media-nations-2024/>

¹⁰ Enders Analysis, 2024, *Viewing Trends: BVOD moves into focus*, <https://www.endersanalysis.com/reports/viewing-trends-bvod-moves-focus#:~:text=As%20viewing%20moves%20online%2C%20broadcasters,the%20decline%20of%20linear%20broadcast>



Source: Recreated from Ofcom, *Media Nations: UK 2024*. Original source notes: Barb as-viewed on TV sets and other devices using the home’s WiFi network, individuals 4+. *Linear’ refers to viewing across all the broadcast channels owned by each broadcaster (whether watched live or on catch-up). BVOD includes all content watched via the on-demand services owned by each broadcaster including non-linear programming. Sky’s BVOD figure includes viewing to Sky’s SVoD service, NOW, because Barb’s measurement is unable to separate this from Sky Go/Sky TV On Demand.

Arqiva is keenly focused on supporting broadcasters to deliver streaming experiences that achieve broadcast-grade stability and quality through our managed media services. Mitigating service interruptions is critical to deliver high-quality streaming experiences, particularly for live events.

Concurrent viewing of live sporting events by millions of people through the internet presents various challenges impacting viewer experience. Network congestion and limited bandwidth leads to buffering and low video quality, and latency and synchronisation issues cause delays. For example, the comparison and switching service Uswitch found that around five million people were at risk of lags in live viewing of the Euro 2024 tournament through online streaming services.¹¹ ISPs have anticipated that significant investment would be required to build additional capacity to support reliable live TV during peak viewing times in the future.¹² The DTT network offers proven resilience to transmit coverage of major live events to millions of households across the entire UK, providing a highly reliable service for viewers and broadcasters during these important moments.

While the audience for online streaming platforms has expanded over the last decade, free-to-air broadcast TV will continue to play a critical role in delivering reliable, live coverage including of events of

¹¹ Birmingham Mail, 2024, *UK households watching Euro 2024 on BBC and ITV issued '45 second' warning*, <https://www.birminghammail.co.uk/news/showbiz-tv/uk-households-watching-euro-2024-29364635>

¹² BT Group, *Future of TV distribution BT Group’s response to Ofcom’s call for evidence*, <https://www.ofcom.org.uk/tv-radio-and-on-demand/public-service-broadcasting/future-of-tv-distribution/>

national significance to millions of UK viewers. This includes, as explored below, groups that do not have access to or use online platforms, or have limited access to these platforms.

The importance of broadcasting for access to listed events among certain groups

The listed events regime prior to the Media Act 2024 designated certain broadcast services that were free-to-air and receivable by at least 95% of the population as qualifying services. To ensure listed events coverage remains widely available to all audiences, it is important for Ofcom to recognise the reach of different services across different audience groups.

Broadcast services, as highlighted above, are available across the UK free-to-air and used by millions of people. There is also a significant group that rely exclusively on DTT, which includes people who cannot receive or afford, or choose not to pay for, alternative services including services delivered through high-speed fixed broadband. Only c.87% of households choose to take any fixed broadband today, and around 6% only connect to the internet via a mobile network. There are indications that the UK may have reached “peak fixed broadband” with slowing growth in fixed broadband connections.¹³

For some, the decision not to take fixed broadband is an issue of affordability – around 8% of households struggle to afford fixed broadband, a figure which has not shifted significantly over time.¹⁴ Others lack interest in, or are not convinced of the value of, a fixed broadband connection. Further, there are millions of people who lack the equipment or digital skills to access online services. The 2023 Essential Digital Skills Framework report estimates that 8.5 million people are unable to complete fundamental tasks needed to access the online world, such as using the different settings on a device, setting up a connection to a wi-fi network, and finding and opening different apps.¹⁵

As shown in research from EY, while high speed broadband take-up is expected to improve over time, a large group – 5.5 million premises – are forecast not to take-up high speed broadband as late as 2040.¹⁶ Those without are disproportionately represented by more vulnerable groups in society, including the elderly, disabled, and low-income households. DTT plays a critical role in ensuring these groups have access to a diverse range of TV including news, entertainment, and live coverage of key moments including those designated as listed events.

The role of broadcast radio in the coverage of listed events

Broadcast radio plays a critical role in providing news and information to everyone – with the radio network reaching 99% of the UK. Broadcast radio is a widely used service, as reflected in strong listening figures reported by RAJAR, which showed that 51 million adults listened to radio each week in Q2 2024, with the majority of listening hours delivered through broadcast platforms – out of 1.048 billion hours of radio

¹³ Enders Analysis, 2024 *Just positive: UK broadband, telephony and pay TV trends Q2 2024*, <https://www.endersanalysis.com/reports/just-positive-uk-broadband-telephony-and-pay-tv-trends-q2-2024>

¹⁴ Ofcom, 2024, *Communications Affordability Tracker*, <https://www.ofcom.org.uk/phones-and-broadband/saving-money/affordability-tracker/>

¹⁵ Lloyds Bank, 2023 *Consumer Digital Index*, https://www.lloydsbank.com/assets/media/pdfs/banking_with_us/whats-happening/231122-lloyds-consumer-digital-index-2023-report.pdf

¹⁶ EY, 2024, *TV distribution after 2034*, https://www.broadcast2040plus.org/files/ugd/c12aae_f09b9b3bd981459b85d6409357cebb49.pdf

listened to in Q2 2024, 43% of listening was delivered through DAB and 26% delivered through AM/FM radio. About 17% was delivered through smart speakers, and 11% through websites and apps.¹⁷

Broadcast radio is especially important for people listening in to commentary while on the move. About half (49%) of people who travel in cars listen through DAB radio and 47% listen through AM/FM radio.¹⁸ RAJAR reports that each week, about 26% of all radio listening takes place in vehicles.¹⁹ DAB and AM/FM radio deliver the majority of in-car radio listening – in Q1 2024, 35.8% of listening was delivered through AM/FM radio, 57.5% was delivered through DAB and only 6.7% was delivered through any internet service.²⁰ Ofcom's research has found that 77% of regular vehicle users value being able to listen to the radio in vehicles.²¹

Broadcast radio will therefore continue to have an important role in delivering commentary on key live events that bring the UK together. Ofcom should continue to support the availability of live radio commentary through broadcast radio to ensure audiences across the UK can participate in the coverage of listed events.

Conclusion

Today, coverage of live events is distributed in a variety of ways. Free-to-air broadcast TV is used and relied on by millions of people for live TV. The DTT service plays an essential role, ensuring universal live coverage of key moments of national significance, particularly for audiences with limited or no access to alternative platforms including online streaming platforms. This includes audiences who are in low-income households, disabled, or elderly. Recognising this, Ofcom should ensure that in implementing the new Listed Events regime it supports the availability of coverage of listed events through broadcasting across the entire UK, so that these key moments continue to bring all UK audiences together.

Similarly, broadcast radio reaches across the UK, and is a highly popular and reliable means for audiences across demographic groups to listen in to commentary on key sporting events covered by the listed events regime. Ofcom should continue to support the availability of listed events coverage in this way across the UK.

¹⁷ RAJAR, 2024, *Rajar Data Release Quarter 2, 2024*,

https://www.rajar.co.uk/docs/news/RAJAR_DataRelease_InfographicQ22024.pdf

¹⁸ Ofcom, 2024, *Media Nations: UK 2024*, <https://www.ofcom.org.uk/siteassets/resources/documents/research-and-data/multi-sector/media-nations/2024/media-nations-2024-uk.pdf?v=371192>

¹⁹ RAJAR, 2024, *Rajar Data Release Quarter 2, 2024*,

https://www.rajar.co.uk/docs/news/RAJAR_DataRelease_InfographicQ22024.pdf

²⁰ Ofcom, 2024, *Media Nations: UK 2024*, <https://www.ofcom.org.uk/siteassets/resources/documents/research-and-data/multi-sector/media-nations/2024/media-nations-2024-uk.pdf?v=371192>

²¹ Ofcom, 2024, *Media Nations: UK 2024*, <https://www.ofcom.org.uk/siteassets/resources/documents/research-and-data/multi-sector/media-nations/2024/media-nations-2024-uk.pdf?v=371192>