Question	Your response
Question 1: What matters should Ofcom take into account in defining "live' coverage"? We'd particularly welcome views on: • The existing approach treating coverage shown while the event is in progress as "live"; • Where live coverage of an event begins and ends; and • How the definition may need to reflect new functionalities, e.g. 'watch from the start'	It seems appropriate that the live element of an event includes opening/closing ceremonies as well as trophy and medal ceremonies, all of which should be seen as relevant to the main event and would also be in the national interest.
Question 2: What factors should Ofcom take into account in defining adequate live coverage? We'd particularly welcome views and evidence on: • The ways in which audiences engage with coverage of multi-sport events and how this has changed over time, and • The considerations that underpin arrangements where both PSBs and providers of non-qualifying services acquire live rights (including from rightsholders).	Linear services remain both accessible and used, which would suggest that the current approach is meeting the Government's policy objective of ensuring that key live sporting events of national importance are widely available on free-to-air. However, we also recognise that the widespread availability of digital services means it is right to consider the principle of accessibility as it is not only linear broadcasting that might meet the Government's accessibility criteria. We believe, however, any streaming service used to show listed events should be in addition to traditional free to air services and not instead of. For example, The FA is comfortable that the iPlayer is used to simulcast the Emirates FA Cup Final, but not if the match were only broadcast on the streaming service and not linear free to air. However, this does not mean that it is necessary to be prescriptive on how or whether linear and digital rights should be split and we believe that National Governing Bodies are best placed to create the balance between providing coverage which both promotes participation

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	and exploits our rights in order to reinvest funds back into the game.
Question 3: What factors should Ofcom take into account in defining adequate alternative coverage for Group B events? We'd particularly welcome views and evidence on: • The minimum duration and maximum delay provisions; • The requirement for live radio commentary for Group B events; and • The ways in which audiences engage with highlights and radio coverage for Group B events and how this has changed over time.	There are no football events in Group B. The current provisions, highlighted in the consultation in section 3.25 appear appropriate for one-off events, but we recognise adequate alternative coverage will be more difficult to define with multi-sport events.
Question 4: What matters should Ofcom consider when revising the listed events Code? We'd particularly welcome views on: • Ofcom's approach and process for giving and revoking consent; • Ofcom's approach and process for giving and revoking consent to televise an event designated by an EEA State or other CTT State; • Ofcom's approach to enforcing compliance with restrictions on showing live coverage of a listed event without authorisation; and • Any additional comments on	We support proposals for automatic consent to be provided for coverage rather than a broadcasters need to apply for consent. **Additional comments** In a rapidly changing market, we must remain flexible in how we sell and promote our rights with new digital offers making it possible to provide additional content to new audiences. We believe that National Governing Bodies are best placed to balance the need to provide accessibility and the need to drive revenue. Within the changing landscape, we remain supportive of Listed Events and the principle of ensuring accessible live coverage and highlights of events of national importance free-to-air. We also support ensuring the policy keeps up with technological developments.

Question	Your response
revising the Code.	