

| | |
|---|--|
| <p>Question 1: Would extending mandatory daytime protection have an adverse impact on the 9pm watershed? Could the change erode public confidence in the 9pm watershed?</p> | <p>In theory, yes, the introduction of a mandatory PIN could operate to erode the effectiveness of the watershed. The 21:00 watershed is a well-known and trusted signpost for unsuitable content and in particular, viewers will have grown accustomed to the gradual increase in more adult-appropriate content as the evening progresses towards 21:00. This change in approach to unsuitable content would have to be balanced against the need to address a call for greater choice for consumers throughout the daytime schedule.</p> |
| <p>Question 2: Would extending mandatory daytime protection increase the risk of children viewing post watershed content?</p> | <p>YouView does not have any available data to provide a valuable response to this question.</p> |
| <p>Question 3: How effective are mandatory PINs currently in protecting children? As part of this response we welcome views on the effectiveness of the protection offered for younger and older children.</p> | <p>YouView does not have any available data to provide a valuable response to this question. We would assume that if the mechanic works for Sky's subscription services, it could be equally effective for all linear channels. However, a joined-up approach to restrictions on VOD and timeshifted/recorded content would need to be adopted, in order to avoid users easily circumnavigating the linear PIN by accessing content from another source (e.g. accessing the VOD equivalent of the programme being broadcast or a recording (even if it is an in-progress recording of the programme being broadcast)).</p> |
| <p>Question 4: What more could be done to bolster the effectiveness of PINs?</p> | <p>YouView requires content providers to submit the appropriate metadata in order to trigger the current PIN mechanism. At present content providers provide their own rating or BBFC ratings of content when submitting assets to YouView. YouView would continue to require both the provision of metadata and the ratings signposting information in the event that a mandatory PIN were to be introduced.</p> |
| <p>Question 5: Do you agree with Ofcom's assessment of the technical limitations involved in implementing an expansion to the mandatory daytime protection rules? Have there been any technical advancements in this area since the Call for Inputs in 2016?</p> | <p>YouView has not yet considered the technical implementation work that might be required, or the resulting costs, in order to support the operation of a mandatory PIN across: (i) all linear content; or (ii) all content offered across the platform. As a result, we are not able to</p> |

| | |
|---|--|
| | <p>provide an update on advancements since the Call for Inputs in 2016.</p> <p>The issue for YouView remains one of resource capability coupled with overall cost. In particular, whether any other YouView roadmap features would be impacted in terms of deliverability.</p> |
| <p>Question 6: As a broadcaster or platform provider, do you foresee any issues with the provision or collection of metadata required for an expansion to the mandatory daytime protection rules?</p> | <p>In order to support PIN protection across all linear channel types YouView would require (at a high level), programme metadata to inform each YouView device when a programme must be protected by a PIN (e.g. via a programme rating, or content flag). YouView devices currently receive metadata through both the DTT aerial feed and via YouView's back end services when connected to the internet. YouView acquires metadata directly from content providers and other partners via a business-to-business (B2B) interface, in order to distribute this to the set top box over YouView's business-to-consumer (B2C) interface. In order to support PIN protection across all linear channels, rated programmes must be accompanied by metadata in a format YouView is capable of recognising. It is highly likely that YouView would need to make changes to both its B2B and B2C interfaces in order to communicate this metadata to the set top boxes.</p> |
| <p>Question 7: How would unconnected and legacy devices behave with the introduction of an expansion to the mandatory daytime protection rules? How do broadcasters and platform providers intend to ensure that there would be no risk of inadvertently broadcasting unsuitable content which is not secured by mandatory PIN protection?</p> | <p>Introduction of a mandatory PIN would also require an update to the STB software to recognise the programme metadata and present a PIN prompt prior to showing the content. YouView would be required to develop additional set top box software to provide PIN protection across all channel types. Devices in the field would need to be updated via a software update in order to be capable of PIN-protecting all linear channels. All YouView devices receive software updates over the internet - devices which are never connected to the Internet, or have not received the relevant software update (e.g. always switched off during software update window), would not receive this new capability. Boxes which have not received this update would provide no PIN protection of rated content broadcast on channels. It is reasonable to expect that a number of devices would remain in this state,</p> |

| | |
|--|--|
| | <p>where they never, or rarely, connect to the internet. This analysis also applies to those legacy devices that YouView would seek to reduce support for over time.</p> <p>There is therefore a risk that a certain number of boxes in the YouView estate would not be in a position to operate a PIN to protect restricted content. YouView would have to undertake significant work in order to even investigate whether a solution could be available to address this risk.</p> |
| <p>Question 8: How would mandatory daytime protection interact with the live pause/rewind/ fast forward functions on certain devices?</p> | <p>YouView's current PIN mechanism applies during time-shift mode as it is linked to the programme metadata rather than the broadcast clock. For recorded content, users can apply the PIN through Settings.</p> |
| <p>Question 9: What accessibility features are currently available, or could in future be implemented, to assist visually impaired people in accessing content restricted by a mandatory PIN?</p> | <p>We currently provide High Contrast and Zoom and these assist the visually impaired. We would also anticipate that voice integration if implemented by platforms, might also assist.</p> |
| <p>Question 10: Are there any other technological, practical or cost issues involved which Ofcom should be aware of?</p> | <p>From a technical point of view, DTT set top boxes may not even be compatible with the underlying software required to implement this change across all linear channels. Further this project would have to compete with other technology roadmap priorities for any given financial year.</p> <p>From a cost point of view we would imagine that platforms would want to run a communications campaign to update users as to the change and there would be a cost to doing this which we haven't quantified.</p> <p>YouView is not yet convinced that the benefits that a consumer might derive from a wider range of content across the pre-watershed schedule, outweigh: (i) the underlying costs to platforms to implement a mandatory PIN in a consistent manner across both all linear content and all content offerings (e.g. VOD and PVR); or (ii) the risk that would still exist in respect of those boxes that have not been updated with the requisite software, either because they are legacy boxes and do not support the latest functionality, or, whilst technically capable of supporting the change, they have simply not been connected to the</p> |

| | |
|--|--|
| | internet and so are not operating on the appropriate software version. |
| Question 11: Which particular types of pay TV subscribers could benefit from increased viewing choice, as a result of an extension in mandatory daytime protection? We welcome information and evidence from stakeholders about the size of such groups. | We don't have any relevant data. |
| Question 12: To what extent could an extension of mandatory daytime protection result in any decreased choice for households with children? We welcome information and evidence from stakeholders. | We don't have any relevant data. |
| Question 13: As a broadcaster, would you be likely to use mandatory daytime protection to broadcast content on your channel(s)? What type of content would this be? Please provide an estimate of the number of hours of broadcast that would be likely to take place in a typical month. | This is not relevant to YouView. |
| Question 14: To what extent would there be any increase in choice for pay TV household groups as a result of the expansion of the mandatory daytime protection rules? We welcome information and evidence. | We don't have any relevant data. |
| Question 15: To what extent might households be likely to switch away from FTA platforms due to the provision of mandatory daytime protection on pay TV platforms only? Ofcom would welcome information and evidence. | We don't have any relevant data. |
| Question 16: To what extent would channels which currently broadcast on FTA platforms be likely to stop broadcasting on those platforms, because mandatory daytime protection can only be used on pay TV platforms? Ofcom would welcome information and evidence. | We don't have any relevant data. |
| Question 17: To what extent could platform competition be stimulated as a result of an extension to mandatory daytime protection? What effects could there be in the longer run on innovation and investment? Ofcom would welcome views and evidence. | Allowing post-watershed content to be broadcast during the day albeit behind a mandatory PIN, would level the playing field in terms of the user's ability to choose the type of content they want to watch and when as they can today via on demand services. This would allow for a greater range of content choice and potentially more opportunity for linear channel providers. |
| Question 18: To what extent are viewers likely | We don't have any relevant data |

| | |
|---|---|
| to switch to channels that offer content behind mandatory daytime protection? | |
| Question 19: Do you agree with our competition assessment above? Please give reasons and evidence where available for your answer. | We don't have any relevant data |
| Question 20: Are there any other relevant competition considerations that Ofcom has not taken into account? Please give details. | We don't have any relevant data |
| Question 21: Do you have any comments on the proposed revisions to the rules in Section One to allow for an extension to the mandatory daytime protection regime? | Not at this stage |
| Question 22: Should the revised rules allow up to BBFC 15-rated films to be shown at 20:00 on premium subscription film channels (as the current rules do)? Or would consistency across all channels be more beneficial? | Consistency across all channels would be beneficial – both from providing the correct technical solution and from a cost perspective. |
| Question 23: What information should/ could be provided with programmes using a mandatory daytime protection to inform viewers on the suitability of the content? | YouView is ultimately dependent on the provision of metadata from its content partners, but ideally, age rating guidance is useful signposting for viewers. |