

Consultation response

Question	Your response
<p>Do you have any views or comments on the issues raised in our consultation?</p>	<ul style="list-style-type: none">• Ex-ante regulation of the Electronic Programme Guide (EPG), through the Code, remains appropriate as a hedge against possible exploitation of gateway power.• We believe the two-yearly review of the Code continues to be a helpful backstop and should remain in place. It ensures that all EPG licensees remain mindful of the importance of the Code's provisions, and of the significance that Ofcom attaches to them.• Ofcom's definition of an FRND approach is reasonable: "an objectively justifiable method would be impartial, rational, dispassionate and reflect a legitimate aim". FRND is designed to avoid intrusive regulation; the text strikes the balance between being light-touch and prescriptive.• Ofcom's proposal to require EPG providers to run transparent consultations is welcome. Digital UK already adheres to this principle.• Finally, we support fully Ofcom's interest in exploring the future of TV gateways. We believe that this is an important issue and immediate threat. As such, it should continue to receive close attention from the regulator and policy makers.

