

## Future of TV consultation – response

---

<b>Key Dates</b>	<ul style="list-style-type: none"><li>→ Publication: 17/10/2023</li><li>→ Deadline for final response: 12/12/2023</li></ul>
<b>Key Documents</b>	<ul style="list-style-type: none"><li>→ <a href="#">Consultation document</a></li><li>→ <a href="#">Consultation overview</a></li></ul>
<b>ISPA Contact</b>	<ul style="list-style-type: none"><li>→ Elisabeth Sullivan</li></ul>

---

### Introduction

The migration of television from terrestrial to internet services is inevitable, and we welcome that Ofcom is engaging early with this and considering the best options for shaping and managing the migration. As the Internet Service Providers Association (ISPA), we have identified a number of key considerations that will be important to keep in mind and explore further as Ofcom develops its approach. First and foremost is a need to actively manage the migration, provide coordination and appropriately balance the priorities of the various players that will ultimately provide for full IPTV delivery.

As ISPA, we have identified a number of key concerns from industry, specifically in relation to: take-up and digital inclusion; ensuring that all players in the stack make the most efficient use of IP delivery; and Ofcom’s role ensuring effective coordination of the switch over, looking at previous models to follow.

In addition to our high-level response, we point Ofcom to the individual responses from our members which explore our points alongside other input in more detail.

### 3. How do broadband networks and supporting infrastructure need to evolve to support resilient delivery of TV over the internet in the future?

The Call for Evidence correctly highlights one of the main challenges for the “future of TV” – in that it is not accessible for those that do not have an internet connection.

At present<sup>1</sup>, seven percent of households in the UK are not connected to the internet, with research indicating that this is for a variety of reasons, including motivation. The broadband sector has been addressing this challenge head on via the rollout of new networks, and a range of efforts to address digital exclusion and affordability, including social tariffs.

The requirement to address the challenge of digital exclusion before the UK can fully make the switch away from DTT highlights the need for Ofcom and Government to look more holistically at digital exclusion, including via a new national strategy. This would need to involve a broad set of

---

<sup>1</sup> [Online Nation](#), 2023

players in delivering digital inclusion initiatives, given that there is a widely shared interest, including from broadcasters, which are likely set to benefit from a switch to IPTV.

In the strategy, policymakers should consider a broad and multi-industry approach, in order to connect with many different and hard to reach audiences. In particular, this should include measures to improve digital skills, awareness programmes to inform people of connection benefits, and funding for broadband and equipment, which would reduce consumer burden to the switchover. With effective coordination, the strategy would provide significant positive outcomes for both individual consumers and the wider UK economy – including contributing to the uptake of digital public services. Consumers would be able to access healthcare services, banking, and a wider variety of products, in addition to continued TV access.

**5. Given the sharing of infrastructure, what would the implications for other sectors be if there was a change to the use of digital terrestrial television (DTT)?**

Ofcom's approach to spectrum management has rightly emphasised and supported the need to use spectrum efficiently, treating it as a finite natural resource. While this approach cannot be transferred 1-1 to the world of full IPTV, we believe that there is strong merit in considering how the efficient use principle can be applied to the delivery of IPTV, including via the use of technologies such as multi-cast, and we believe that there is a strong case for Ofcom to play a coordinating role to ensure that all players in the stack make the most efficient use of IP delivery.

Given current and predicted viewing trends, we expect a significant increase in internet traffic in coming years. In particular, a vast majority of this traffic will come from live TV viewership, with major events – i.e. sporting tournaments or culturally significant events – causing “super peaks” which will present new delivery challenges for providers. Therefore, in order to avoid significant consumer and resilience impact, it is essential that there are mechanisms in place to enable and encourage the efficient distribution of IPTV both in terms of content and volume.

**6. What coordination and planning across the value chain might be necessary to secure good outcomes for audiences and key providers over the long term?**

We believe that, as the regulator, Ofcom has the opportunity to capitalise on its soft power with industry and set out a strategic vision – potentially in partnership with Government – for switching from DTT to IPTV. The necessity of having a plan was demonstrated by the digital switchover, which featured information campaigns to raise awareness and was executed quite smoothly.

This would need to incorporate aspects of a digital inclusion campaign, alongside an awareness campaign as to the benefits and necessity of the switch. We would also recommend that Ofcom ensure that broadcast networks and internet providers can each communicate their needs effectively, and the use of spectrum is distributed evenly.



Overall, effective coordination and planning across the value chain require collaboration between industry participants, government entities, regulators, consumer advocacy groups, and other stakeholders. Such collaboration ensures that the long-term interests of audiences and key providers are prioritised, leading to a resilient and universally accessible TV distribution system.