The BBC’s Distribution Strategy and Draft Distribution Policy

12 February 2018

Digital TV Group Comments and Observations

Background

The Digital TV Group (DTG) welcomes the opportunity to comment on the proposals put forward by the BBC that define how its services are made available to the public to watch, listen or use; this includes the conditions it sets for distribution via third parties. We note that the consultation focuses on the Distribution Policy document however, we are also responding in the context of the Distribution Strategy, published 12th February 2018, as member feedback suggests that it may be helpful to consider these together.

Although the DTG often acts as a proxy for the viewer and consumer, it does so from the perspective of the broad array of its corporate membership which ranges from Hollywood Studios to broadcasters and TV platforms, through to the consumer electronics industry, retailers and consumer groups. DTG membership also includes a wide range of technology suppliers and partners to the UK digital TV industry whose views are also represented where appropriate.

As publishers of the only digital television specification to be universally deployed in the UK market, we have grounded our response in our experience of universal delivery of innovative services in a low total-life cost manner. We believe that delivery approaches must consider the true costs of design and development, integration, test and in-life support from design to deployment and across the entire value chain and life. Our initial response only addresses the three ‘types of distribution’ identified within the Scope of the Draft Distribution Policy.

Our response to this consultation reflects the opinions of DTG Members but does not represent the views of individual organisations who may respond separately.

Transmission

While IP delivery offers a number of distinct advantages over traditional DTT, we also see potential divergence as in-the-clear services are currently provided free of charge at the point of consumption via a simple coaxial connection. IP-delivered services impose additional actors and charges in the form of ISPs and CDNs (at a minimum) to the broadcaster and consumer in both fixed and wireless environments. We believe there needs to be clarity across the industry to replicate the simplicity and success of free-to-view DTT transmissions. In the future, bandwidth must be made available with access to BBC/PSB IP video services that is not subject to traffic or service management (i.e. a version of net neutrality as applied to the transmission of linear TV over IP) as this may impact the viewing experience when consumed on compatible devices.
In the DTT environment, there is virtually zero incremental “cost per stream” when adding additional viewers and devices. Therefore, we would recommend the BBC consider the impact of significant peak activity and national events in defining and designing an IP transition, especially considering how distribution networks and consumer devices (network equipment and in-home receiving equipment) handle traffic and service management equitably.

We anticipate that the BBC will continue to support, hybrid DTT/IP environments where major channels are carried using the DTT network with additional services (or variants) delivered via IP. Although not explicitly drawn out in the policy, we assume this would be covered in the BBC’s ‘Value For Money’ obligations – ensuring the most cost effective/appropriate channels are used for broadcast services. The BBC should also consider the risk of any unintended consequences that may arise if industry trends, such as innovation in picture and sound, e.g. Ultra High Definition (UHD) is not introduced on traditional broadcast platforms, as well as considering the more obvious challenges of achieving universal deployment cost effectively over IP. It may be helpful for the BBC to consider broadcasting next generation broadcast innovations that are being introduced in other territories, such as the DVB-T2/HEVC move by France and ASTC 3.0 in the USA and Korea.

Similarly, a traditional antenna based system allows for an unlimited number of receiving devices connected to an antenna, whereas an IP-based system has potential limitations as a result of bandwidth to and within the home. These limitations introduce additional complexity to the receiver/in-home distribution system and its relationship with the network devices and services provided by an operator. We believe that future platforms should outline these interfaces and ensure that all broadcast services delivered in-the-clear can be received using any compatible device, via the most cost-effective distribution mechanism - certified like the existing DTG testing and conformance regime.

Syndication

The BBC are identifying the iPlayer as an example of a syndicated service on ‘third party managed’ platforms in the draft Distribution Policy. We anticipate that any standards put in place for the delivery of linear IP services would also provide the underpinnings of any iPlayer-like service regarding connectivity on retail and other connected platforms.

We recognise the success of the iPlayer as a platform for distribution of BBC content. Where there is still near-universal access to BBC linear services on all conformant DTT devices sold prior to and since the digital switchover, we want to ensure that the iPlayer continues to operate on platforms which have been certified for a minimum period of time. A consumer purchasing a certified retail device would expect all of the primary services to operate for a significant period, however we note that the iPlayer has been deprecated on many platforms, leaving consumers unhappy.

This document has been written using feedback from the DTG’s membership but does not necessarily represent the views of all DTG member organisations. Please note that the DTG is made up of member companies who may also be submitting an individual response to this OFCOM consultation.
We note the BBC mention a platform “falling so far behind technological developments” may be cause for withdrawal of services. We would suggest that defining and creating a minimum service specification for the iPlayer (a ‘baseline version’); ensuring this is delivered using industry-standard technologies and subject to minimum change would likely ensure standardised testing and conformance, and increase the longevity of the platform. Costs to the BBC and manufacturers for ongoing development, maintenance and support would also be minimised. Unlike mobile or computing platforms, consumer television and AV equipment benefit from an extended replacement cycle; this should be recognised in any syndication/distribution guidelines along with clarification of what constitutes an appropriate ‘technological development’ as we define profiles for the delivery of these services.

**Publishing**

The DTG operates primarily in the horizontal platform environment and fully supports the ability for the BBC to publish its content and assets in a standards-based manner across multiple environments. We would propose that there is further clarification of the mechanisms and supporting metadata used for the publication of assets and the subsequent reporting on the access and use of these. The DTG champions interoperability and fully endorses this approach by the BBC to distribute its content across multiple IP platforms.

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**About the Digital TV Group**

The DTG is the self-funding UK collaboration centre for innovation in digital media technology, reaching industry, government, academia and international partners, set up with the purpose of looking after the digital TV marketplace. It underpins the free-to-air platforms Freeview, Freesat and YouView, and supporting the development of Sky, Virgin Media, BT and TalkTalk.

It has been central to the distribution of TV in the UK for nearly two decades through the collaborative development of industry standards and best practice, and is currently embracing the convergence of content and networks across industries to focus on the efficient delivery of video to all screens - mobile, tablet and TV - in all formats: standard, high and ultra-high definitions.

The DTG supports the next generation of digital TV and related technologies through its work in the delivery of video to mobile devices, television on tablets, spectrum coexistence management, TV white space, home networking, connected TV, accessibility and the UK UHD Forum. For more details, please visit dtg.org.uk and dtgtesting.com.

Richard Lindsay-Davies

Email - rdavies@dtg.org.uk

Phone - 07880783044