



# BBC iPlayer proposals: Public Interest Test consultation

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BBC consultation document

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### 1. Executive summary

This document is the BBC's consultation with stakeholders on its proposals to improve BBC iPlayer for licence fee payers. We set out the market context, the importance of ensuring the BBC delivers public value and our proposals.

This consultation runs from Monday 7 January 2019 to Friday 15 February 2019.

The BBC's Charter requires us to serve all audiences through the provision of impartial, high-quality and distinctive output and services which inform, educate and entertain. It is vital that the BBC can adapt to ensure viewers can watch these programmes at their convenience.

The BBC must give value for all licence fee payers, as the viewing habits of audiences increasingly move from linear to on demand services. The service that the BBC offers for the licence fee (which is currently £150.50 a year) must adapt to reflect the expectations and demands of licence fee payers.

For many viewers, and particularly younger audiences, BBC iPlayer is increasingly the front door to the BBC's content offer. In the future, BBC iPlayer will be the main way that audiences watch BBC television programmes and not just a catch-up service.

One of the reasons audience expectations and habits are changing is because of what the UK market already delivers, following the entry of new Subscription Video on Demand (SVOD) providers like Netflix and Amazon Prime. These SVOD providers have more content, available for longer (usually three years or more for acquired content and in perpetuity for originations) than any of the UK Public Service Broadcasters (PSBs), and have far greater financial resources to fund their ambitions. As a result the market norms have fundamentally shifted.

Whilst in 2007 BBC iPlayer was seen as a trail-blazer with a 7-day catch-up service, the current model of content being available for 30 days needs to be improved to match the expectations and needs of our audiences.

BBC audiences enjoy the great British content we provide across a range of genres: from the best in British drama to ground-breaking natural history documentaries. They expect the BBC to reflect and represent the diversity of the UK. Never has this been more important and BBC iPlayer is a critical route to getting them that great content.

Therefore, the BBC must be able to adapt as the market changes, or risk becoming irrelevant and failing to deliver the great public value it currently offers to British audiences. Ofcom has recognised this in its Annual Report on the BBC which said

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that the BBC “needs to find new ways of reaching younger people that suit and reflect their viewing...habits”.<sup>1</sup>

The alternative would be for the BBC to be prevented from innovating for the first time in its history. Rather than being at the forefront of change, we would be in the rear-guard. We would become less relevant to younger audiences at a time when they are telling us they want more from the BBC. And if the BBC fails to meet the demands of younger audiences at this time, they may never return to the BBC in the future.

To ensure we can continue to serve our audiences, we are proposing to transform iPlayer, moving it from primarily a catch-up and linear TV service into a destination for our audiences, where the BBC’s programmes will be available for longer, both for individual programmes and box sets.

Therefore, we are consulting on our proposal that, like other big players in the market, the length of time for which we can keep programmes available on BBC iPlayer would be determined by our commercial negotiations with the market. We think the results of this new offering for our licence fee payers might look like:

- Longer initial period of availability for all programmes of at least 12 months;
- Complete series box sets for selected titles made up of new returning series and their previous series; and
- More archive content.

These proposals are subject of course to the BBC’s budget, commercial negotiations and the cost of rights in the UK market.

Given the scope of these changes, Ofcom consider they would constitute a material change to the BBC’s UK Public Services, which require a Public Interest Test. We are therefore publicly consulting on these proposals, to give stakeholders an opportunity to comment before the BBC carries out a Public Interest Test on these proposed changes and determines whether they meet that test.<sup>2</sup>

We expect to come to a decision on the full scope of changes having carried out the Public Interest Test. We will then send the proposed changes (which will reflect any amendments made as a result of responses to this consultation) and details of our

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<sup>1</sup> [Ofcom's Annual Report on the BBC, 2018](#)

<sup>2</sup> On 2 November 2018, [Ofcom directed](#) the BBC to carry out a Public Interest Test of our plans to offer longer availability of programmes on BBC iPlayer during 2018/19 and to include any further strategic plans for BBC iPlayer. This consultation is in part in response to that direction.

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assessment against the Public Interest Test to Ofcom. We aim to publish the proposed changes, in the appropriate way, in Spring 2019.<sup>3</sup>

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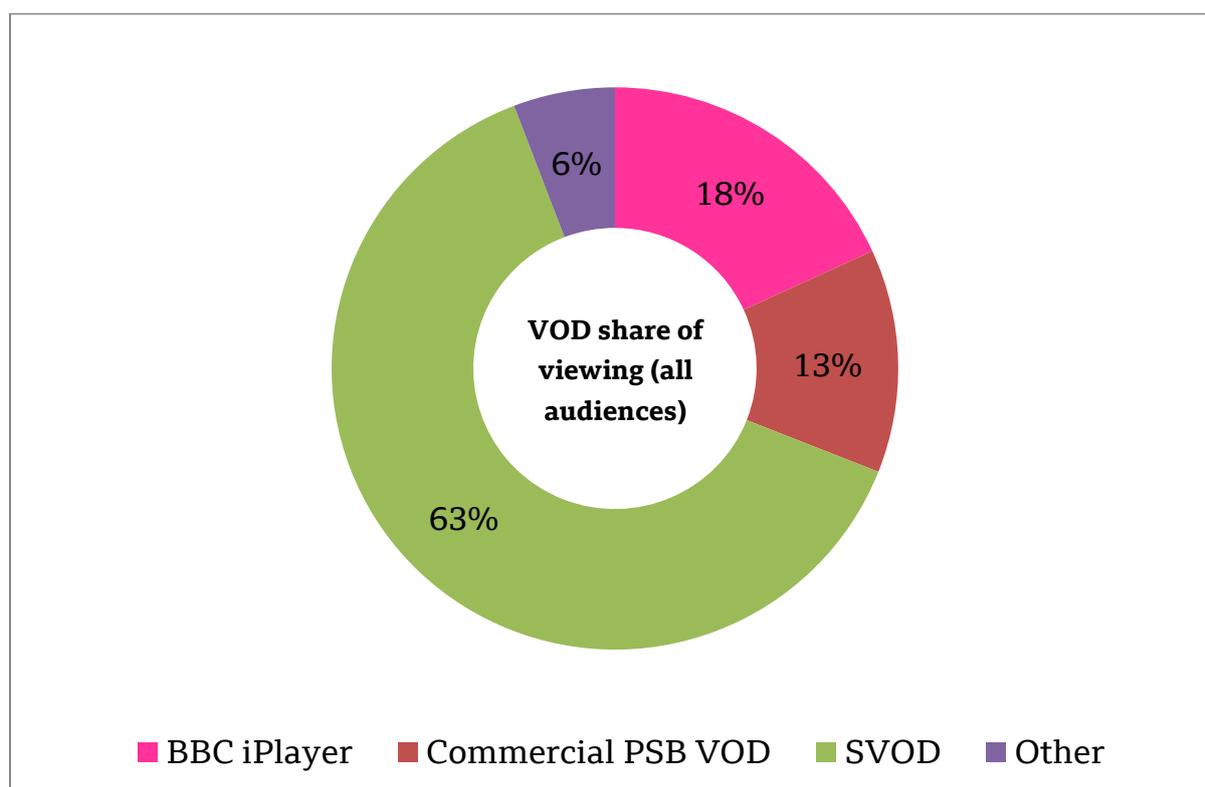
<sup>3</sup> In accordance with [our published policy on material changes](#), the BBC will not publish commercially sensitive material that may be part of the proposal or which has been supplied to it by stakeholders.

## 2. Market context

### 2.1 Video on demand is increasingly replacing linear television

Audiences of all ages are turning to VOD to enjoy their favourite content and watch box sets. Over 40% of UK households now use at least one SVOD service.<sup>4</sup> This has more than doubled in three years, and our forecasts show this trend will continue.

Between 2010 and 2016 UK daily video viewing minutes for linear TV declined from 215 to 173 minutes whilst at the same time VOD grew from 8 to 25 minutes over the same period. And while the four UK PSBs accounted for about 70% of time spent with linear TV in 2017, in VOD they account for only 31%.<sup>5</sup>



Source: CMM, average over July 2017-March 2018 and BBC internal data

Our forecasts show that the trend away from linear towards VOD will continue in the coming years, and time spent with VOD will continue to increase as linear TV declines.

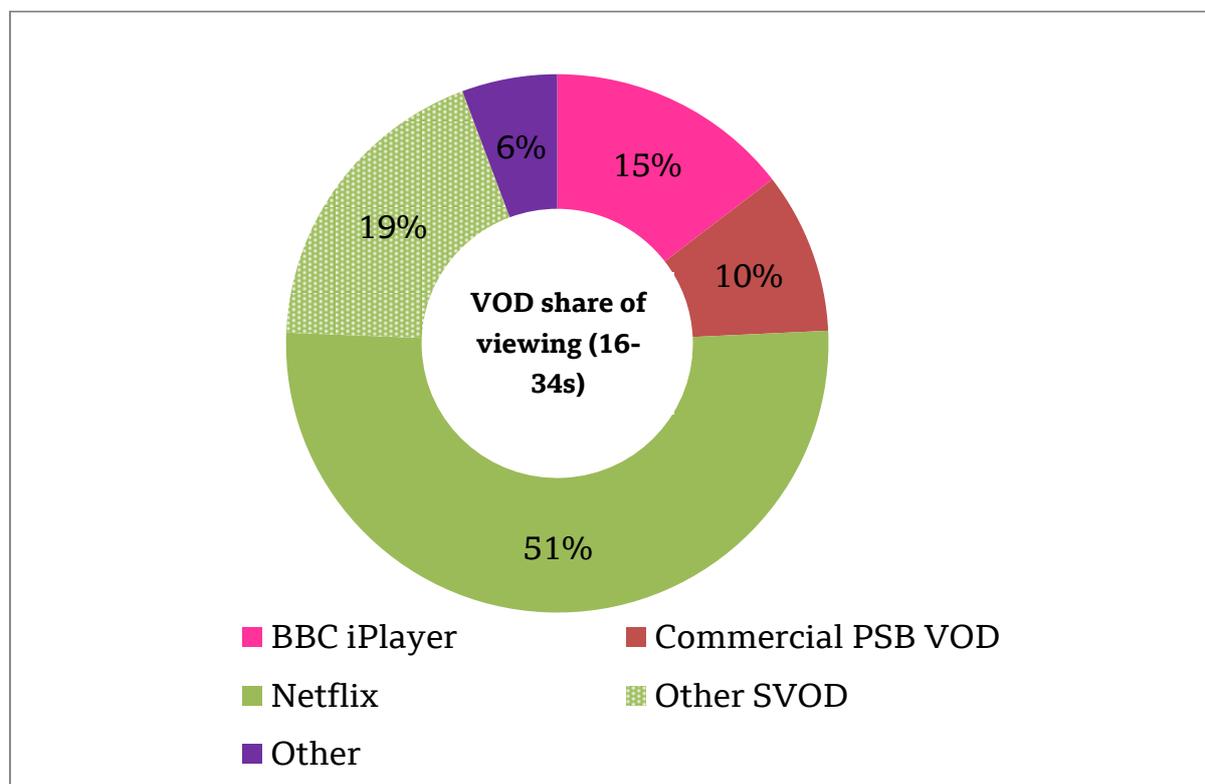
<sup>4</sup> [Ofcom's Media Nations report, 2018](#)

<sup>5</sup> BBC internal analysis.

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The move to on-demand services is even more pronounced for 16-34 year olds with less than half of average daily viewing coming from linear TV, and it seems unlikely that they will watch an increased proportion of linear TV as they get older.<sup>6</sup>

As the chart below makes clear, VOD in general is much more significant for younger audiences, with Netflix alone accounting for over half of time spent by younger audiences on VOD in 2017.



Source: CMM, average over July 2017-March 2018 and BBC internal data

## 2.2 Global streaming services have changed the way UK audiences watch TV

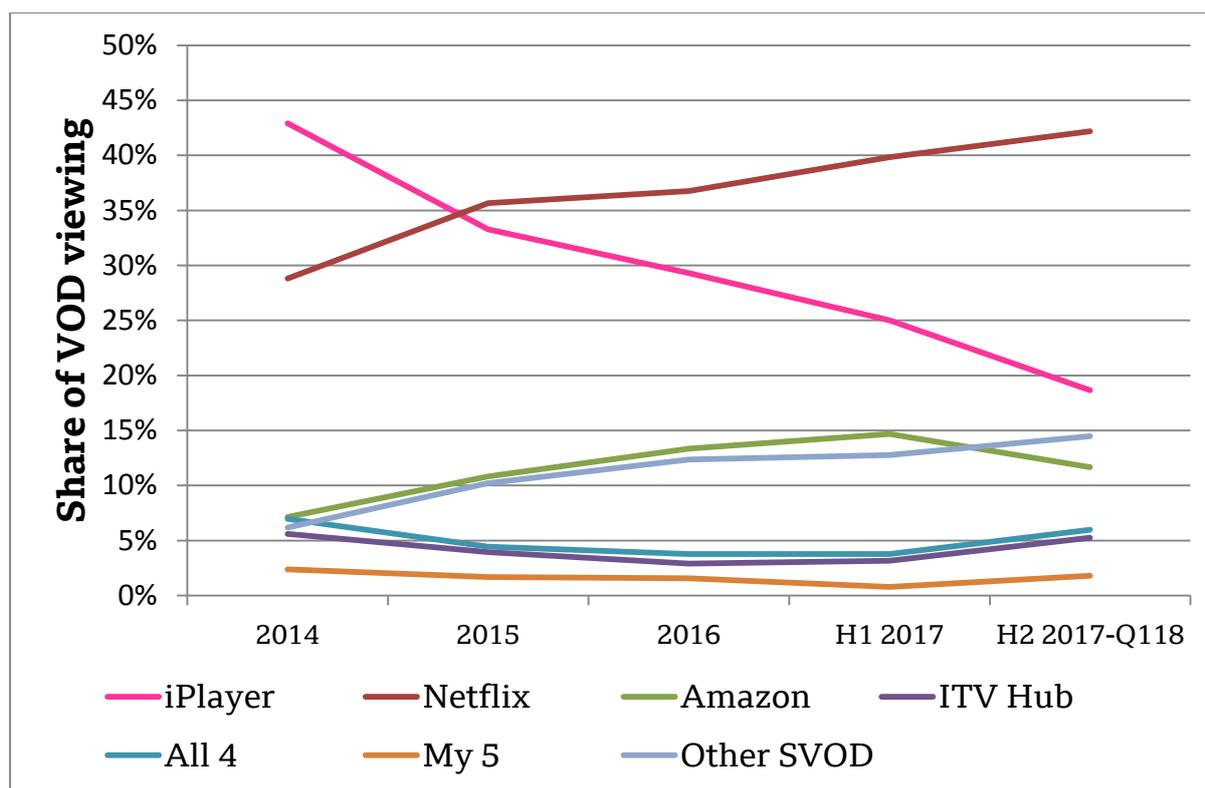
The entry of global SVOD providers such as Netflix and Amazon has fundamentally changed the way in which audiences view TV programmes in the UK.

The UK VOD landscape in the UK is increasingly dominated not by UK based broadcasters but by global SVOD providers, with US-based Netflix and Amazon alone taking over half of the VOD market. As the chart below shows, these global SVOD providers have grown at the expense of BBC iPlayer and other UK PSBs' VOD services.

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<sup>6</sup> Enders Analysis, [TV set viewing trends: Linear remains vital](#)

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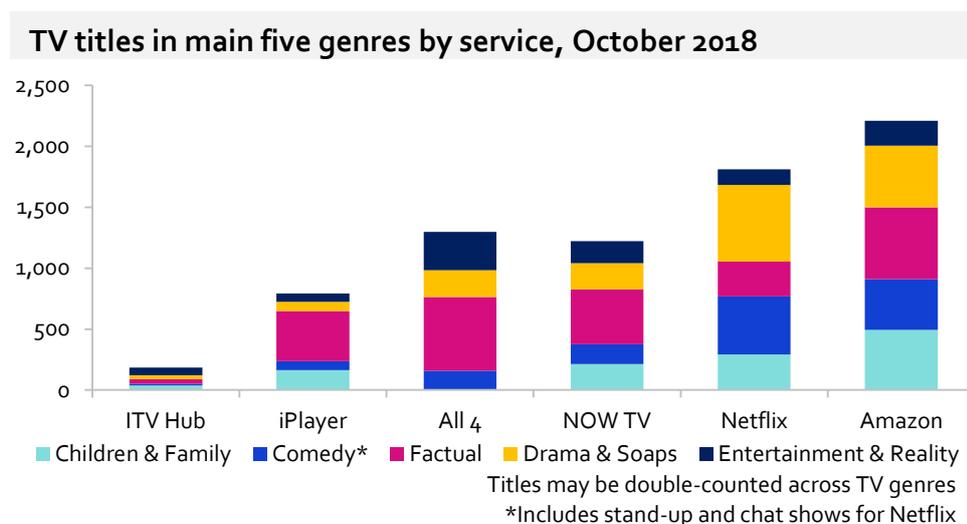
Source: CMI, 2014-H12017, CMM H2-March 2018 and BBC internal data

It is striking that, over the last four years, the combined market share of Netflix and Amazon has grown from 36% to 54%, whilst BBC iPlayer's share has more than halved.

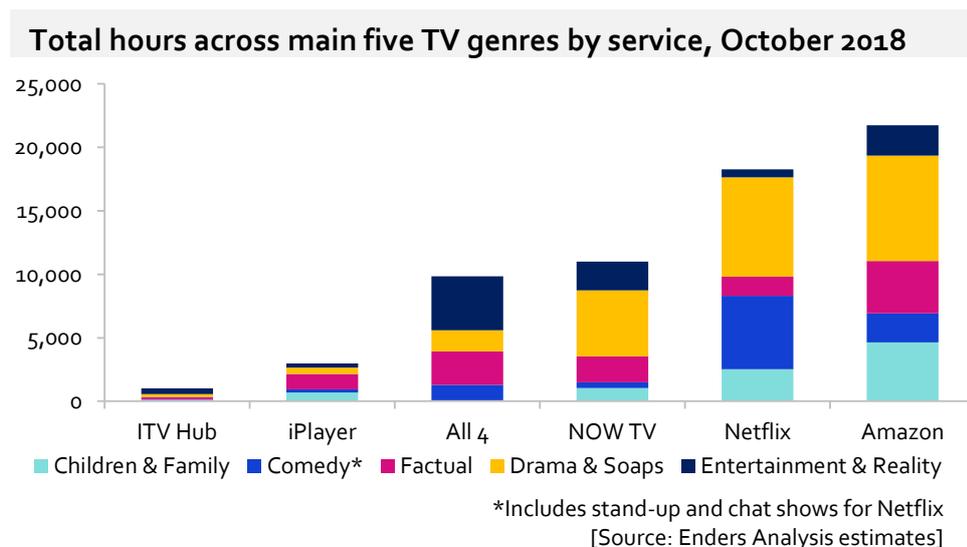
The market norms have fundamentally shifted. Many SVOD providers typically offer audiences much longer availability than BBC iPlayer, usually three years or more for acquired content and in perpetuity for originations (for example, Netflix's *House of Cards* and *Orange is the New Black*, and Amazon's *The Man in the High Castle* and *Transparent*). They also typically offer complete box sets for titles (i.e. all series).

As the two charts below show the SVOD providers are able to offer audiences both more titles and more hours than the PSBs.

## TV titles in main five genres available to watch by service, October 2018



## Total hours available to view across main five TV genres by service, October 2018



The vast majority of the US-based SVOD providers' content originates in the US; UK audiences using these services do not encounter the best British content in the way they do on linear TV or BBC iPlayer. The sector also continues to evolve, with new US owned subscription services recently launched by YouTube and expected to launch in the UK next year from Apple, Disney and potentially WarnerMedia (which includes HBO).

Without further changes to BBC iPlayer, the opportunities audiences have to access the best British content will continue to shrink.

### 2.3 The response from other UK broadcasters

In this context, other UK broadcasters are taking steps to improve their VOD services.

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ITV has set out its plans to create an SVOD service, as well as improvements to its core ITV hub service.

ITV has also recently concluded a deal with PACT to allow it to offer a period of six months extended availability for all singles and one off series. Under the terms of the deal, ITV will also be able to provide full series box sets for current returning titles.<sup>7</sup>

Channel 4 already has a sizeable box set offer on All4, including commissions and acquired content, with content available for several years. For example, Enders Analysis reported All4 as having 378 complete series available in December 2017.<sup>8</sup>

Channel 5 has 12 months VOD exclusivity for all one off and returning series<sup>9</sup> and has entered into commercial partnerships to include third party content on its My5 VOD service.<sup>10</sup>

And it is not just the PSBs having to adapt. Sky now makes Netflix available to its Sky Q and Now TV customers in the UK. Virgin customers can also access Netflix, with combined billing. Enders Analysis recently reported that in October 2018 Now TV was able to offer 1,222 TV titles to customers and that Sky Box Sets included some of the best US drama and comedy from HBO and Showtime, as well as Sky's original productions.<sup>11</sup>

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<sup>7</sup> [ITV and PACT Memorandum of Understanding, September 2018](#)

<sup>8</sup> Enders Analysis, [Video On Demand Insights, January 2018](#)

<sup>9</sup> [http://wwwcdns3.channel5.com/wp-content/uploads/2016/01/11193930/C5-Pact-MOU-Published\\_Fully-Signed\\_11.9.18.pdf](http://wwwcdns3.channel5.com/wp-content/uploads/2016/01/11193930/C5-Pact-MOU-Published_Fully-Signed_11.9.18.pdf)

<sup>10</sup> <https://www.broadbandtvnews.com/2018/07/04/channel-5-signs-new-streaming-deals/>

<sup>11</sup> Enders Analysis, [SVOD in the US and the UK: a tale of three-player markets](#), December 2018

### 3. Providing public value in an increasingly on-demand market

The BBC's mission is to act in the public interest, serving all audiences through the provision of impartial, high quality and distinctive programmes and services, which inform, educate and entertain.

In doing so the BBC has to deliver great value for money in return for the licence fee (which is currently £150.50). Our audiences currently rate the BBC as good value but this will change if we cannot meet their needs and expectations, particularly in terms of on-demand content both in video and audio.<sup>12</sup>

The Charter also requires the BBC to focus on technological innovation to support the delivery of the UK Public Services. And the BBC's Framework Agreement with the Government requires the BBC to "do all that is reasonably practicable to ensure that viewers, listeners and other users (as the case may be) are able to access the UK Public Services that are intended for them, or elements of their content, in a range of convenient and cost effective ways."

To be able to deliver on this, we must ensure our audiences are first able to access BBC services. Historically this meant providing linear TV channels that were broadcast universally across the whole of the UK, but increasingly linear TV is less significant. We must move with the times and in delivering public value we must deliver our services in way that allows people to access them, and to access them in the ways that they want.

For audiences who are not using linear channels the licence fee of £150.50 a year will increasingly be seen as poor value for a limited 30-day catch-up VOD service. For audiences within this group, the primary mode of consumption is BBC iPlayer first, where the concept of 30-day catch-up seems increasingly irrelevant.

Audiences tell us that what they like least about BBC iPlayer is the range of content and the length of availability. Our analysis shows that dissatisfaction with these issues increased as users have become used to new market norms of permanent availability and being able to watch content when they want it, rather than linked to transmission date or arbitrary deadlines.<sup>13</sup>

Audiences tell us how frustrating they find it when a series disappears before they have finished watching it, or when they want to start a new series from the beginning but the early episodes are not available.<sup>14</sup> For example, without the changes we made earlier this year, audiences would now not have the opportunity to watch any episodes of *Bodyguard*, a huge audience success that was only broadcast in September.

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<sup>12</sup> Source: Accountability and Reputation Tracker by Kantar Media for the BBC

<sup>13</sup> BBC internal research and analysis.

<sup>14</sup> BBC internal research and analysis.

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From the programmes that we have already made available for longer, we conclude there is clear audience demand beyond the current 30-day catch-up window for most titles, and that there is strong demand for previous series to be made available on BBC iPlayer, both standalone archive box sets and all the past series relating to a current returning series. And those audiences expect that this should be part of the BBC's licence fee funded offering.

Where BBC Three titles have been available for more than 12 months, more than one third of viewing has taken place after 6 months, illustrating the audience desire for this longer availability and the ability to capture public value over a longer time period.

Audience research also suggests that to be effective as a VOD service we need to have a significant volume of programmes available.<sup>15</sup> SVOD providers offer their audiences high volumes of programmes available for long periods of time. Part of this offer is made possible by having content available for long periods of time, so when new content is added it adds to the existing offer, rather than replacing content that is being taken down.

Therefore through audience feedback and our understanding of the market, we consider that audience demand would support making more content available for longer on BBC iPlayer, including bringing back more archive content.<sup>16</sup>

### 3.1 We are a major investor in the creative economy across the UK

The BBC commissions content from a very broad and diverse base of suppliers – much more so than any other broadcaster in the UK. Not only does this ensure that we deliver the best, most creative content for our audiences, but it also represents a significant benefit to the UK creative economy. Moreover, our commitment to commissioning from suppliers across the whole country not only ensures that our programmes better reflect people's lives, but also geographically distribute some of the economic benefits of producing content for the BBC.

The public value of the BBC is based on this diversity and distinctiveness of what people can discover on the BBC. We consider it imperative that to maximise this public value licence fee payers need to have the maximum opportunity to discover the BBC's content, and do so through BBC iPlayer.

### 3.2 BBC iPlayer today

Launched in 2007 as a catch-up service for programmes shown on the BBC's TV channels, BBC iPlayer now allows licence fee payers to:

- catch-up on BBC television programmes after linear broadcast;

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<sup>15</sup> Source: BBC internal audience research.

<sup>16</sup> Source BBC Audience Feedback & GFK; SNL S&P Global Market intelligence

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- stream the BBC's television channels live; and
- watch a small amount of archive BBC content, as well as other on-demand audiovisual content like BBC Three.

In addition to BBC commissioned content and in line with our duties under the Charter and Agreement to enter into partnerships, BBC iPlayer also hosts some third party content. This includes the ability to watch S4C's programmes live or for 30 days after transmission. In addition, over the past two years, BBC iPlayer has hosted content from partners such as the British Council, Royal Shakespeare Company, Shakespeare's Globe, Battersea Arts Centre and the Roundhouse.

While the VOD market has been evolving, and other providers have been innovating, BBC iPlayer still functions largely as a catch-up service for the BBC's linear TV channels. The short standard 30-day availability for new BBC commissions allows audiences to do little more than catch up on these programmes following linear TV broadcast compared to the substantially longer availability now offered by US SVOD providers, with their key titles often permanently available. This is increasingly true for other UK media organisations.

There are several instances where the standard 30-day window does not apply, including: acquisitions; permanent collections / deep archive; BBC Three Online; news (some available for less than 30 days, some current affairs strands are available for more, e.g. Panorama is available for a year); programmes funded by third parties (including Ulster Scots Broadcast Fund and Irish Language Broadcast Fund, etc.); radio and short form content; and sports (generally for less than 30 days due to rights restrictions).

However, in general the 30-day window fundamentally restricts the catalogue the BBC is able to offer licence fee payers, particularly around BBC originations, and prevents BBC iPlayer being much more than a catch-up service for our linear TV channels. As a result it is harder for viewers to engage with a series from the beginning if they have come to it late and they can miss out on enduring, high quality public service content, such as natural history programmes. Audiences increasingly expect longer availability and are increasingly using those services that can offer this at the expense of PSB catch-up services.

### **3.3 The BBC has experimented with making some material available for longer periods**

Between January and October 2017 the BBC made 20 box sets (primarily drama and comedy series) available on BBC iPlayer. Some of these, such as *Car Share*, *Top of the Lake*, and *White Gold*, were released as full box sets on BBC iPlayer at the same time as the first episode was broadcast and kept available until 30 days after the final episode was broadcast. Others, such as *Doctor Who*, *Our Girl*, and *W1A*, were built up over time, with episodes added to BBC iPlayer as they were broadcast and then kept on iPlayer until 30 days after the final episode was broadcast.

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Between 16 December 2017 and 16 January 2018 the BBC experimented with releasing more than 30 box sets comprising over three hundred episodes or standalone programmes for viewing on BBC iPlayer as a special Christmas offer. The programmes comprised a mix of ‘catch-up’ titles (i.e. programmes recently been broadcast on BBC TV services), some box sets (multiple series), some single series, some one-off Christmas specials from previous years, some children’s films and some BBC Three programmes. The genres covered were mainly drama, comedy, and children’s programmes.

On the basis of these experiments in May 2018, the BBC began to offer significantly longer availability on some titles.<sup>17</sup> By the end of December 2018 we had provided our audiences with extended availability of more than 30 days on 261 series across 95 titles.<sup>18</sup> For example, in the run-up to Jodie Whittaker’s debut in *Doctor Who*, we have published a full box-set of every episode since the series returned in 2005. We have also offered *Bodyguard* to audiences for six months.

These experiments have been successful with audiences. Since we have started offering longer availability and more full series box sets, we have seen significant improvement in audience satisfaction, particularly among younger audiences. In October 2018, 70% of 16-34 year olds agreed that BBC iPlayer “has full series available for people like me” (compared to only 52% in July 2017). 63% of 16-34 year olds agreed that “it makes programmes available long enough for me to watch them before they expire” (compared to only 52% in May 2018). 72% of women 16-34 agreed that BBC iPlayer “It helps me to discover new things to watch”.

Ofcom have agreed that we can continue to make some content available for longer, subject to some conditions, as we conduct this Public Interest Test.<sup>19</sup>

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<sup>17</sup> In May 2018, the BBC Board [decided that these plans were not material](#). This is the decision that Ofcom disagreed with in its [2 November decision](#).

<sup>18</sup> These figures exclude CBBC and CBeebies programmes, and acquisitions

<sup>19</sup> Ofcom’s [Review of the BBC’s Materiality Assessment of Proposed Changes to the BBC iPlayer: final interim directions](#), 17 December 2018

## **4. The BBC's proposed changes to BBC iPlayer**

As we have shown above, the new global SVOD providers in the UK market – such as Netflix and Amazon – have established the ‘new normal’ for online video available for several years or in perpetuity for their audiences.

The success of shows such as *Peaky Blinders*, *Bodyguard* and *Killing Eve* demonstrates that the BBC is able to commission content that stands out and is successful with both linear and on-demand audiences in the UK and internationally.

However, audiences expect extended availability for TV programmes on the BBC UK Public Services beyond just catch-up. They also expect state-of-the-art personalisation, user experiences and recommendations. In order to meet these expectations, it is necessary for iPlayer to evolve.

### **4.1 Changes to content availability on BBC iPlayer**

We propose to extend the availability of content on BBC iPlayer.

To ensure we can continue to serve our audiences, we are proposing to transform BBC iPlayer, moving it from primarily a catch-up and linear TV service into a destination for our audiences.

Our ambition for BBC iPlayer is to move away from a world where a large number of BBC programmes are only available for a fixed and limited period (e.g. the current catch-up window) following linear broadcast, instead having an iPlayer where we can make available programmes for different periods of time to best serve our audiences, in line with the way the market is changing.

These changes would incorporate all of the changes we have made since the start of 2018/19 for BBC iPlayer, but go even further towards giving audiences what they expect and we believe provides them with good value for their licence fee and enables the BBC to continue to deliver its public purposes.

The model of a single fixed 30-day catch-up window is in danger of becoming irrelevant in the current market conditions. Therefore, we are proposing that like other big players in the market, the length of time for which we can keep programmes available on iPlayer would be determined by our commercial negotiations with the market.

This does not mean that the BBC will be able to put whatever it wants on iPlayer. The BBC will face very real constraints from the market and its fixed budget. In particular:

- For new programmes we are constrained by the terms of our business framework and the rights we acquire when we commission from independent producers;

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- We have to compete with other broadcasters and VOD providers to secure rights for archive material and acquisitions in an increasingly competitive market; and
- Even for archive BBC content where the BBC owns the intellectual property we need to pay rights holders (e.g. the writers) if we want to make this available in BBC iPlayer.

We commission very few programmes for BBC iPlayer only. We do commission BBC Three programmes and programmes targeted for younger audiences, for example those aged 12 to 15. However, over time this is something we will continue to look at, taking into account changing audience needs and demand. By having more programmes available for longer we would increase the overall volume of programmes our audiences are able to watch through BBC iPlayer.

Below we have set out what we think the results of this new offering for licence fee payers might look like.

### (1) Longer initial period of availability for all programmes for at least 12 months

The BBC does not believe that one standard period of initial availability of content is the answer for all programmes. It is likely to differ by programme genre. For example, audiences expect much longer availability for some programmes in genres such as drama, comedy, natural history and children's. Some sports rights will be a lot shorter – for example, *Match of the Day* is available for seven days.

Our starting point is that we will follow the market norms for content which currently range from several years to in perpetuity. Our current expectation is that the BBC public service window for iPlayer would be for at least 12 months, but potentially could be for longer depending on what we can secure in the market.

We have started discussing with PACT<sup>20</sup> the fact that the current rights model no longer delivers sufficient public value for the investment made by the BBC. We would also expect to hold similar discussions with non-qualifying independent producers.

The BBC's offer needs to allow audiences more opportunities to discover all the BBC's new programmes, as well as watch all episodes of a particular series without early episodes dropping off BBC iPlayer before the final episodes are available as they do now.

### (2) Complete series box sets for selected titles made up of new returning series and their previous series

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<sup>20</sup> The trade association representing the commercial interests of UK independent producers.

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In some genres, such as drama and comedy, and for selected key titles, we plan to be able to show all past episodes from previous series, providing complete series box sets that will allow audiences to “start from the beginning” on key returning titles. For example, this means that as children discover *Doctor Who* for the first time, they will be able to watch from the first series (since its return) to the latest, just like they would be able to do for their favourite shows on All4, ITV Hub, Netflix or Amazon Prime. However, we anticipate that this will only apply to some titles.

### **(3) More archive content**

We plan to bring more BBC archive material back on to BBC iPlayer. We expect to make archive programmes available for periods of time in line with market norms, (e.g. up to 12 months or potentially longer), taking into account audience demand for different programmes. This will include archive BBC produced content, as well as programmes made by third parties. However, archive titles will continue to be a small proportion of the overall content offer on BBC iPlayer.

### **(4) Acquisitions**

We will also continue to acquire programmes in the secondary market for transmission on our linear television channels in line with relevant market norms. We expect that acquisitions would be available on demand in BBC iPlayer for periods of time which reflect the typical terms of commercial agreements. However, we are not intending to acquire such content solely for BBC iPlayer.

## 5. Further details on the consultation

### 5.1 The Public Interest Test process

The Public Interest Test is a key component of the BBC's system of governance, which took effect in the current Charter and Agreement from April 2017.

The Agreement gives the BBC's Board the responsibility, in the first instance, for considering the impact of certain planned changes to the BBC's UK public services.<sup>21</sup> The BBC must consider whether any proposed changes to these activities are material. The BBC may only materially change its UK public services where: 1) it has carried out a Public Interest Test; 2) the test is satisfied; and 3) Ofcom has determined that the proposal can proceed. For the UK Public Services, the Agreement defines material changes as the launch of a new UK public service, or a change to an existing activity which may have a significant adverse impact on fair and effective competition.

To meet the criteria set out in the Public Interest Test, the BBC Board must be satisfied that the new initiative supports the BBC's mission; that it promotes its public purposes; that the BBC has taken reasonable steps to ensure that the change has no unnecessary adverse impact on fair and effective competition; and that the public value of the initiative justifies any impact on the competition. Where the BBC Board determines that the above elements of the Public Interest Test are satisfied, the BBC will publish the proposed change and refer it to Ofcom.

As the BBC's regulator, Ofcom will make the final determination on whether a material change can proceed or not. In reaching its decision, Ofcom will assess whether the proposed change is material and conduct a Competition Assessment or a shorter assessment.

### 5.2 The BBC's consultation

This consultation runs from Monday 7 January 2019 to Friday 15 February 2019.

This consultation reflects the BBC's commitment in its published Policy on Material Changes<sup>22</sup> to seek feedback from interested parties when it is undertaking a Public Interest Test. As Ofcom notes in its Operating Framework<sup>23</sup>, it is in third parties' interests to ensure that they raise concerns with the BBC when we are conducting our Public Interest Test and to draw attention to potential issues arising from the proposals at this stage.

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<sup>21</sup> A list of the UK Public Services is set out in Schedule 1 of the [Framework Agreement](#) between the BBC and DCMS.

<sup>22</sup> [Policy on material changes to the BBC's public service activities and commercial activities](#), 7 August 2017. This is also an expectation set out in Ofcom's Operating Framework "[Assessing the impact of proposed changes to the BBC's public service activities](#)", Paragraph 4.16

<sup>23</sup> *Ibid*, Paragraph 4.17

## BBC iPlayer proposals: a Public Interest Test consultation

This consultation sets out information about our future plans for BBC iPlayer. Our intention is to provide stakeholders with information sufficient to enable them to meaningfully engage with us as we finalise our proposals, which we will ultimately include within a public interest test. While there remain areas of uncertainty at this stage of our process, we consider we have provided as much information as we can on our plans without publishing any information that may be commercially sensitive.

We are seeking views from all stakeholders, including specifically industry, on our proposed changes to BBC iPlayer particularly on the following questions:

Question 1: What do you think about the potential public value of our proposals for enhanced availability of BBC content, including the extent to which our proposals contribute to the BBC's mission to serve all audiences through the provision of high quality and distinctive output and services which informs, educates and entertains?

Question 2: What do you think about the benefit to consumers who will use the service, as well as wider potential social and cultural impacts?

Question 3: What impact (positive or negative) do you think our proposals on enhanced availability might have on fair and effective competition?

Question 4: Are there any steps you think we could take to minimise any potential negative effects on fair and effective competition or to promote potential positive impacts?

We would be grateful if respondents could, wherever practical, respond to each question directly. Please contact [publicinterest.test@bbc.co.uk](mailto:publicinterest.test@bbc.co.uk) if you have any questions about this process, our consultation, or want to discuss these proposals further.

Please indicate in your response whether any or all of your response should be treated confidentially. We will use responses to inform our future work on the Public Interest Test. We may refer to responses, either in general terms or specific references, as part the public interest test, which we will publish. For confidential responses we may ask about how to include these in a Public Interest Test where relevant, as well as whether or not we can provide these to Ofcom on a confidential basis to help Ofcom with its assessment on materiality.

### 5.3 How to respond

If you would like to respond to this consultation, please email your response to [publicinterest.test@bbc.co.uk](mailto:publicinterest.test@bbc.co.uk) or write to BBC Corporate Affairs, Room 5045, BBC Broadcasting House, Portland Place, London, W1A 1AA.

When submitting your response please fill in and include with your submission the confidentiality and data protection statement.