YouView response to the BBC’s consultation on the draft distribution policy
April 2018
Introduction

1. YouView welcomes the opportunity to respond to the BBC’s consultation on the draft distribution policy (“Policy”).

2. In particular, we note that the Policy is designed to govern how BBC services are made available to the public. Given that one of YouView’s key objectives is to be the best place to find great content, ensuring the availability of BBC content on the platform is vital for the venture.

3. YouView is currently the UK’s fastest growing TV platform. This is due to the range of content it offers, the fact that it is free at the point of use (unless a consumer decides to pay for additional services), its ease of use and set up and the fact that the two ISP shareholders are subsidising the cost of equipment.

4. YouView does not directly contract for content but currently enables any content provider to run services across the YouView platform using any business model. We currently provide the full range of PSB on demand players as well as a range of services from commercial providers. We believe we have increased the distribution of shareholder content and have had an overall positive impact on the distribution of content to consumers.

5. YouView has had a major beneficial impact on the UK digital TV market providing the core free to air DTT audience with an easy upgrade path from Freeview. We have preserved the principles of PSB prominence in linear television and extended them into on demand services, meaning that BBC content is readily and easily discoverable for consumers. This has been achieved by considerable investment in the redesign of the interface and also by investment in common metadata standards which allow for aggregated search and browse across the full catalogue of content available on YouView. Taken together these will help ensure universality of delivery for the BBC’s content and services as they push into new forms of delivery.

6. In this response to the consultation (“Response”), we have sought to identify those areas in the Policy where we would welcome further information/guidance from the BBC.

7. For ease of reference we have used the headings/sub-headings as set out in the Policy. We are happy to elaborate on any points contained within this Response.

The BBC’s Conditions for Distribution

Prominence

8. We note that the Policy covers distribution of the BBC’s services. It is not clear how the Policy and the 2016 BBC Distribution Guidelines (“Guidelines”) interact. It is our understanding that once in force, the Policy will supersede the 2016 BBC Distribution Guidelines, but it would be helpful if this could be expressed in the final version of the Policy as published.

9. We also note, as per section 3.4 of the Policy, that BBC content and services should be given “fair and appropriate prominence, wherever they appear on the platform.” The venture acknowledges this as an aspiration for the application of prominence.
However, we are mindful of the need to understand how the BBC might seek to apply this in practice.

10. In this regard, we note that “Appropriate” prominence is expressed in the Policy as “in line with audience needs and expectations”. YouView welcomes this clarification in the Policy, particularly in the context of search results, which in the venture’s view, should be fair and should return the results most likely to correspond with the user’s query.

11. Similarly, YouView would not expect to employ absolute prominence for any PSB content in its search function. However, we do acknowledge that prominence for BBC (and other PSB) content and services would be the likely consequence in such areas, given the overall popularity of the content in question.

Editorial Control

12. We understand “editorial control” to mean control over the choice of BBC items presented and the ability to ensure that the mix of content and relative prominence is conducive to a broad representation of BBC content and control over ordering of content within any given UI, but in a curatorial rather than product design context.

13. We would therefore not expect editorial control to result in a requirement to make product, user experience or design changes within a platform, as this would go beyond “adequate curatorial influence” as expressed in paragraph 3.8 of the Policy.

Conclusion

14. We hope that this Response is of assistance to the BBC and would be happy to discuss any element of the Response if that would be of use.