



Satellite & Cable  
Broadcasters' Group

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[Director@scbg.org.uk](mailto:Director@scbg.org.uk)  
17<sup>th</sup> July 2009

Dear Mr Snalam,

I writing to you on behalf of SCBG members to express our concern at the actions you propose to take which would change the way the EPG on your platform would be presented.

In your consultation paper you state that this change would be to support new HD services and 'tidy up' the platform. Whilst the SCBG can see the logic in creating space for HD channels, we cannot see any evidence in your consultation document for the further changes put forward. Our concerns relate specifically to the creation of 'special interest' and 'shopping' genres which will move our members from a prominent position on the EPG to an area where viewers may have difficulty finding them. The rationale behind the creation of these genres is not properly explained. Nor are the criteria for why one channel would be considered 'special interest' and another would not. There is no evidence given for why the changes suggested are beneficial to the viewer. Furthermore, SCBG members who will be most affected by these changes have evidence to show that they could do significant damage to their viewer figures.

The changes proposed at the moment seem to favour the large PSB incumbents and their related non-PSB channels to the detriment of others and could even be considered as anti-competitive. We are also concerned that allowing these changes at this time will set a precedent for further changes of a similar nature in the future.

We consider the consultation period of 4 weeks to be too short and not wide enough. As a key stakeholder, representing a number of channels on your platform, the SCBG was not notified of the proposed changes by DMOL. The SCBG has contacted Ofcom to register its concern at the quality of the DMOL

consultation on this issue and to investigate whether the proposed changes comply with the code in this area and if there are concerns relating to competition.

We suggest in the strongest possible terms that you consider extending the consultation in line with government guidelines of 10 weeks and present the evidence you are using to make the changes you call for. We also suggest that in the interest of transparency, DMOL publish all responses to this consultation.

I look forward to hearing from you further on this matter.

Yours sincerely,

A handwritten signature in blue ink that reads "Kerry Neilson". The signature is fluid and cursive, with a long horizontal flourish at the end.

Kerry Neilson

Executive Director  
Satellite and Cable Broadcasters' Group