

Digital Connectivity Forum response to Watch this Space: a new strategic direction for UK media

September 2026

About the Digital Connectivity Forum

The Digital Connectivity Forum (DCF) is the primary advisory group to the UK Government on the provision of seamless digital connectivity. Our goal is seamless digital connectivity, empowering positive societal change and economic growth across the UK.

We are an expert advisory forum for the entire digital connectivity sector. Through collaboration, evidence-building and research, we make recommendations to Government, regulators and industry. Our membership spans fixed and mobile network operators, internet service providers, infrastructure and neutral host providers, equipment manufacturers, broadcasters, satellite operators, business groupings, central government, the devolved administrations, local government and Ofcom.

Further information about the DCF is available at connectivityuk.org.

Introduction and scope

The DCF welcomes the opportunity to respond to Watch this Space: a new strategic direction for UK media. Our response addresses Chapter 3, and in particular section 3.1 on the future of TV distribution. We have not commented on the wider proposals on media regulation, prominence or the public service media compact, which fall outside our remit.

The migration of linear television from digital terrestrial television (DTT) to internet protocol television (IPTV) is a matter of direct and material significance to our members. It will make fixed and mobile networks the primary means by which television is delivered in the UK. In doing so, it transfers a set of costs, operational responsibilities and resilience expectations from the broadcast chain onto the connectivity sector, and it does so at a point when the Green Paper does not yet set out how those costs will be quantified, allocated or funded.

The DCF is not a trade body, and our purpose is not to advance the commercial interests of any one part of the sector. Our membership includes converged operators with simultaneous interests as broadband providers, mobile operators and TV platforms, and what serves one of those interests does not always serve another. This response therefore sets out the position we hold in common, and is candid where views within our membership differ.

We have structured our response around the practical conditions that would need to be satisfied for the transition to succeed, because we believe that is where the Green Paper most needs input from our sector.

Summary of our position

- The DCF supports 2034 as the active planning date for a managed withdrawal of DTT, conditional on the readiness, funding and resilience conditions set out in this response being resolved before a final switch-off decision is taken.
- A managed transition with safeguards is preferable to unmanaged decline. It provides the long-term certainty needed for investment and avoids prolonging parallel legacy infrastructure indefinitely.
- We call for a publicly funded technical transition plan and a publicly funded audience support package, fully costed, with identified funding sources, published alongside or ahead of the White Paper.
- The Green Paper proposes an industry-led support programme. We do not believe an industry-led, voluntary model will reach all of the households that need help most.
- The transition is being pursued in the public interest and its benefits accrue to society as a whole. It should be publicly funded on that basis. Costs and responsibilities should not be reallocated between parts of the value chain by default, and should not fall on broadband customers and network providers nor TV licence fee payers.
- Resilience requirements should be judged on whether IP delivery is acceptable on its own merits rather than on whether it replicates DTT, should be set across the whole IPTV delivery chain using equivalent measurement boundaries, and should not be concentrated on the access network simply because it is the most regulated part of that chain.
- Government should set out published, measurable readiness tests, independently assessed, with a defined timetable to meet them.
- The scale, cost and funding of customer support at the point of migration should be addressed explicitly in the transition plan.
- Several matters that are material to the transition sit outside the Green Paper's current scope, including broadcast radio and PMSE. These should be brought into scope. Some of these, such as broadcast radio, already have their own policy process and should be coordinated appropriately with this one.

The transition date: conditional support for 2034

The Green Paper presents two options: managed withdrawal of DTT on expiry of current licences on 31 December 2034, or a time-limited extension to 31 December 2044. There are differing views within our membership, and we set them out here.

Those who favour the later date point out that a longer runway allows a greater proportion of migration to occur naturally as households replace equipment and adopt IP delivery of their own accord, reducing both the number of households requiring active intervention and the overall cost of supporting them. A later date also aligns switch-off more closely with fibre upgrade and equipment replacement cycles that operators are already planning and funding, rather than requiring those cycles to be accelerated to meet a policy deadline. On this view, Government could allow the transition to happen largely organically, intervening at the point at which the residual cohort is small enough to be manageable and at lower support costs.

Those who favour 2034 point out that extension is not a cost-free option. Maintaining DTT to 2044 would itself require investment, including the likely cost of a platform upgrade and an associated audience support exercise, meaning public and industry investment would fund two major transitions in sequence rather than one. They also note that DTT's capacity to underpin universal reach is already declining as viewers migrate organically, which progressively weakens its value both as a universal delivery platform and as a resilience backstop. A clear date, on this view, provides the accountability and investment certainty that a drifting timetable does not.

On balance, the DCF supports 2034 as the active planning date for a managed withdrawal of DTT, subject to conditions. Our support is not for the date in isolation; it is for a transition in which the funding mechanism, readiness tests, resilience framework and cost allocation set out below are settled before a final switch-off decision is taken, rather than in parallel with it or after it. However, if this approach were pursued, the Government would then need to update the regulatory model that Arqiva operates under, to ensure value for public money of any further extensions, something that is likely to be required to support cost effective continuation of broadcast radio in any case.

We would ask that the White Paper is explicit about what mitigations accompany the date. At present the Green Paper sets out an intention to work with industry on a support programme, but does not demonstrate that the costs of the transition have been quantified, or that a mechanism exists to fund them. Confirming a date without that detail would transfer an unquantified liability onto parts of the sector that have no ability to quantify or recover it. When it confirms a date, the Government must set out how it will work through the issues set out here, especially on affordability and adoption, network capacity and super peaks, and resilience; to establish an agreed approach and, where needed, sustainable funding mechanisms.

If Government concludes that these conditions cannot be put in place on a 2034 timetable, then the case for a managed transition to 2044 becomes correspondingly stronger. What would serve audiences least well is neither date, but an unmanaged decline in which DTT degrades as carriage becomes uneconomic, without a plan in place for the households still relying on it.

A publicly funded technical transition plan and audience support package

The Green Paper envisages a coordinated, industry-led effort to support audiences to transition their viewing, delivered by PSM providers, platform operators, telecoms providers, manufacturers, retailers, charities and local delivery partners each playing their part. We understand the appeal of that model, but we do not believe it will deliver on its own. Moreover, the individual stakeholders involved will have their own, often conflicting, interests. A voluntary programme in which participation is a matter for each company or benefitting sector will not achieve universal reach, will not be competitively neutral between participating and non-participating providers, and will place the greatest obligation on those most willing to act rather than on those best placed to fund it.

We therefore call for two publicly funded programmes, both fully costed and with an identified funding source:

- A technical transition plan. A published engineering and delivery programme covering the network and wider IPTV delivery chain, with defined milestones and named owners.
- An audience support package. A programme of support for households that cannot otherwise make the transition, covering equipment, installation, in-home set-up, digital skills support and, where required, connectivity. Many of these households will also require ongoing support after the transition itself is complete. This should be designed and funded as a public programme, with industry delivering against it, rather than industry being asked to devise and fund it.

Our reasoning on funding is straightforward as a matter of economics. The households that will need help are, by definition, those the market has not already reached. They are disproportionately older, on lower incomes and in rural areas. On any commercial assessment they are the least attractive cohort to connect and support: the revenue available from serving them does not offset the cost of doing so, and it compares unfavourably even with the existing social tariff cohort. There is no commercial return available here that Government can rely on to draw in private funding. The support has to be paid for, and because it is being provided to deliver a public policy objective from which the public benefits, it should be paid for publicly.

On mechanism, our members would favour demand-side support delivered to the household, for example through a voucher-type scheme, over supply-side obligations placed on network providers. Demand-side support is technology and provider neutral, preserves competition, reaches the household directly and is more readily costed and audited. Supply-side obligations, by contrast, distort competition between providers depending on their customer mix and geographic footprint.

Whatever mechanism is chosen, any affordability intervention must be universally available. A scheme in which only some providers participate would leave households unsupported depending on who happens to serve their area, and would penalise participating providers. We would also caution against treating broadband affordability as a question to be resolved through the TV transition. Affordability is a standing public policy issue that exists irrespective of DTT switch-off, and it should be addressed on its own terms and funded accordingly.

There is a substantial opportunity here that the Green Paper only partly captures. The point at which a household is contacted, connected and supported to receive television over the internet is also the point at which it can be supported into getting for the first time or upgrading their fixed telecoms service, and then into wider digital participation: online public services, health, banking, employment and social connection. Designing the audience support package as a digital inclusion intervention with television as the trigger, rather than as a narrow TV migration exercise, would deliver considerably more public value for broadly the same delivery cost. It would also materially strengthen the benefits side of the economic case.

We would recommend that a fully costed plan, identifying areas of agreement and remaining disagreement across industry, is published with any new areas of responsibility or funding are consulted on transparently and appropriately.

Readiness: coverage, adoption and equipment

A 2034 date is achievable, but it cannot be assumed to follow from broadband coverage alone. We would highlight the following as necessary conditions.

Gigabit availability

Gigabit-capable broadband must be available across the nation, and the delivery of that ambition is not yet assured. We call for the retention of Project Gigabit funding and for appropriate phasing of that funding. We also ask Government to resolve remaining barriers to rollout, including long-standing issues such as access to multi-dwelling units, which are particularly impacting rollout in urban areas. Without progress on both, the Government's own target of 99% gigabit coverage by 2032 is under threat, and with it the foundation of the transition.

Adoption, not just availability

Coverage and take-up are different measures, and the transition depends on the latter (i.e. adoption of digital connectivity services). A household within a gigabit footprint that has not taken a service, or has taken a service it cannot afford to sustain, is not a household that is ready. Readiness assessment should track adoption and usage, not just premises passed. Readiness planning should also include devising, consulting on and implementing a sustainable, publicly funded model of support for households that cannot afford a suitable connection..

Rural parity

Ensuring rural areas reach parity with urban areas on both infrastructure and adoption is of critical importance. Done well, the transition improves the television experience in areas currently poorly served by DTT and radio coverage, and can be an argument for accelerating rural connectivity rather than a threat to it. Low earth orbit satellite services have a role in closing residual gaps, and should be recognised in the plan.

Skills, equipment and support

Households need the skills, equipment and support to make use of a connection, not simply the connection itself. This is the element most likely to be underestimated, and it is the element for which no funding is currently identified. Equipment and service design also play a key role here. The Government introducing standards for simplicity, safety and consistency across key basic services will empower more households to be able to use IP services whether broadband, IPTV or banking, and reduce the volume and so cost of support required by those that will still need help.

Published readiness tests

We ask Government to set out measurable readiness tests covering coverage, adoption, affordability, equipment and resilience; to have them independently assessed, with Ofcom the natural body to do so; and to define the decision point at which they are evaluated. Readiness tests that are published and testable give industry something concrete to plan against. Readiness described in general terms does not.

Network capacity and the economics of simultaneous viewing

Linear broadcast currently absorbs synchronous viewing peaks, such as major sporting events and breaking news, outside broadband networks entirely. A DTT transmitter carries the same cost whether one household or ten million are watching. IP delivery does not behave that way. Shifting all linear viewing to IP means that peak concurrency must be carried by access and core networks that are dimensioned for a materially different traffic profile. IP networks are also multi-service platforms and are, by their nature, contended: the many applications and services carried over them compete for the available capacity. This contrasts with DTT, which was designed solely for the transmission of television signals.

A key engineering challenge the transition creates is peak concurrency. How much capacity is ultimately required is not yet knowable: it depends on whether quality guarantees are mandated, on the mix of resolutions delivered, and on whether delivery is unicast or multicast. Simultaneous mass viewing of a single live event is a different problem, and it is the problem the transition creates. The networks and the wider IPTV delivery chain must be able to support simultaneous events, and must be able to carry emergency communications reliably at the same time.

Two further points follow. Where modelling assumes that operators can absorb large increases in simultaneous live streaming through traffic management, demand shaping or differentiated quality of service, it should recognise that the availability of those techniques may be constrained by existing regulatory requirements. There is also scope for straightforward coordination to reduce avoidable peaks - for example, scheduling large software and game downloads away from major live events - which costs little and should form part of the transition plan.

Multicast and equivalent efficient delivery techniques are central to addressing this, but they require investment across the chain and coordination between broadcasters, platforms, content delivery networks and network operators. They will not appear by default. Where multicast capability, additional peak capacity, incident management or back-up power provision are required to deliver a public policy objective, those costs should be identified and a funding mechanism agreed.

We welcome the work that DCMS is already undertaking on reliability and capacity of networks and encourage this to include a technical assessment of peak concurrency requirements under the transition. The DCF would be willing to contribute to and/or undertake further work in this area as appropriate.

Resilience and reliability

Resilience is a key policy challenge of the transition, and it is the area where the Green Paper would benefit most from technical input.

DTT and IP delivery are structurally different and cannot be compared directly. DTT resilience sits largely with the broadcast network and a passive aerial: few components, few handovers, limited dependence on mains power at the reception end. IP delivery is a chain of many steps, involving multiple parties and handover points, several of which sit outside any individual network operator's control, and all of which depend on mains power.

We would also question the framing of the comparison itself. DTT and IP delivery are fundamentally different mechanisms and will always exhibit different characteristics. The right test is not whether IP delivery can replicate DTT, but whether it provides a level of reliability and resilience that is acceptable for the service being delivered, judged on its own merits.

That difference should not be read as an argument against IP delivery. IPTV already operates reliably at scale in millions of UK homes, IP performance improves year on year, and coverage is expected to exceed DTT coverage as gigabit rollout completes. Nor is DTT a reliable resilience backstop in the scenarios that matter most: all television platforms, including terrestrial, fail in a sustained power outage, and in a genuine crisis radio and mobile alerting are the primary universal communication channels. As DTT usage continues to decline, its value as a universal backstop declines with it. The right conclusion is that policy should prioritise power-resilient internet infrastructure and robust alerting, rather than retaining terrestrial television as a proxy for resilience.

We would ask that any resilience framework is built on three principles.

- Whole-chain scope. Requirements should be set across the full delivery chain, including data centres and cloud infrastructure, content delivery networks, interconnection, internet service providers and in-home equipment. Concentrating obligations on the access network because it is the most regulated part of the chain would neither reflect where risk actually sits nor deliver the outcome sought.
- Equivalent measurement boundaries. Performance and resilience standards must measure comparable things. A DTT availability figure measured to the aerial cannot be set against an IP figure measured to the application on the screen. Without agreed measurement boundaries, any comparison of the two platforms will be misleading.
- Responsibility follows control. Obligations should rest with the party that controls the relevant risk. No party should be held accountable for the performance of components it neither owns nor can influence.

We would also flag a point of process. Some of the resilience expectations now being discussed would, in substance, treat IP television distribution as critical national infrastructure. That would be a significant designation, with significant cost and obligation attached. Any consideration of whether IP television distribution should be designated in this way should be undertaken through formal consultation, including of the funding implications and

requirements, rather than the designation being arrived at incrementally through accumulated obligations.

Finally, the growing dependence of UK television delivery on a relatively small number of global intermediaries, including cloud providers, content delivery networks, device operating systems and app stores, is a legitimate resilience and sovereignty consideration. The transition is an opportunity to build greater independence and security into UK IP infrastructure, and that opportunity should be taken deliberately rather than left to market outcomes.

Cost allocation: who pays for what

There is at present no published mechanism setting out how the costs of migrating DTT-only households, upgrading networks and funding audience support would be divided between Government, broadcasters and network operators. This leaves operators exposed to costs whose scale and allocation are undefined, which is a material obstacle to supporting a firm date.

It is worth separating what are in practice three different funding questions: the transition programme and audience support scheme itself; support for households that cannot afford a suitable connection; and the incremental capacity and resilience requirements placed on the IP delivery chain. These differ in kind and in duration, some being time-limited and others ongoing, and there is no reason they should all be funded in the same way or by the same parties. Treating them as a single question has made the debate more difficult than it needs to be.

The starting point should be a clear view of who benefits. In our assessment the principal beneficiary of this transition is the public. The gains it delivers - bringing the remaining offline households online, wider access to public services, health, banking, learning and employment, improved accessibility, reduced isolation, and a television ecosystem that is sustainable into the next decade - accrue to society as a whole rather than to any single part of the value chain. The transition is being pursued because it is in the public interest. It should be funded on that basis.

We would propose three principles.

- Public benefit, public funding. Where a transition is pursued to deliver a public policy objective, and its benefits accrue broadly across society, the costs of achieving it should be met from public funds rather than cross-subsidised within the value chain. This is the clearest and most durable route to a funded transition. It also avoids a protracted argument between commercial parties about relative benefit, which would consume time the timetable does not have and would not resolve the funding question at the end of it.
- Responsibility follows control. Where costs arise from managing a risk, they should sit with the party that controls that risk. No party should be asked to fund the mitigation of a risk it can neither own nor influence.

- No default reallocation within the value chain. Costs should not migrate from one part of the value chain to another simply because the technical means of delivery has changed. We apply this consistently and in both directions. We are not arguing that broadcasters should fund broadband affordability, which is a standing matter of public policy. Equally, broadband customers and network providers should not fund a change in the means of broadcast distribution, although we note the current model funds the best efforts delivery of streamed VOD today.

There is precedent for a publicly funded approach, and it is the precedent that worked. The 2012 digital switchover was accompanied by a funded audience support programme rather than left to industry goodwill. More recently, the rollout of Emergency Alerts was publicly funded, on the basis that a capability delivering a public benefit should be paid for publicly rather than added to network operators' cost base by obligation. That reasoning applies directly here, and with particular force to any proposal to place emergency communications duties on IP delivery.

The costs that should be explicitly addressed in the allocation framework are those that are genuinely incremental: additional peak capacity, multicast capability, resilience and back-up power requirements, incident management and monitoring, customer support and contact-centre demand at the point of migration, and the audience support package itself. We ask that a cost allocation framework, identifying the funding source for each element, is published before the White Paper. Our concern is less with securing any particular division of cost than with the absence of a division at all: an unallocated cost does not disappear, it settles by default on whichever party is least able to refuse it.

Market conditions, governance and process

A 2034 timetable depends on the right market, governance and regulatory conditions being in place.

Governance

Governance structures should give the connectivity and technology sector an equal voice alongside broadcasters. The connectivity sector will carry a substantial share of the delivery burden and the operational risk, and its participation should be structural rather than consultative. Where commercial negotiation between parties fails to secure necessary standards or terms, Government should be prepared to intervene directly.

Delivery model

Delivery should be through the kind of open, cross-industry collaboration that made the 2012 digital switchover work, with clear public accountability and Ofcom oversight. That programme succeeded because it had a defined delivery body, published milestones, funded audience support and a single public-facing communications effort. Those features are the relevant precedent, and they are absent from the model currently described.

Transparency of process

Decisions of considerable significance are being progressed through workstreams, taskforces and industry groups running in parallel with this consultation, including an expectation that industry brings forward proposals in September. We support that engagement and are participating in it. We would ask, though, that its outputs are published, including where there is broad agreement and where there remains active disagreement, and that the conclusions are tested through the formal consultation process. A decision of this magnitude should be reached transparently and on the record, rather than settling by default through parallel processes.

Matters that fall outside the Green Paper's current scope

The Green Paper's treatment of the transition is, in our view, drawn too narrowly. It focuses on support for the audiences who need to be migrated and on the sustainability of the public service media system. Several consequential matters are not addressed, and each of them has infrastructure implications that our members will be asked about. We ask that they are brought into scope for the White Paper.

- Broadcast radio. DCMS are already running a Radio Review which is welcome and we call on the conclusions of this to be coordinated with the conclusion on TV distribution. Radio transmission shares infrastructure, sites and economics with television transmission. Changes to the television transmission network may affect the cost base of radio distribution, and radio's role as the primary universal channel in emergencies makes this more than a commercial question.
- Programme making and special events (PMSE). PMSE depends on interleaved spectrum within the bands under discussion. Any spectrum release timetable needs to address PMSE requirements explicitly, and to do so early enough for the sector to adapt, with support in place if necessary to migrate to new technology and / or bands.
- Emergency communications and public warning. The dependencies between television, radio, mobile alerting and broadband in a crisis scenario should be assessed as a system, not platform by platform. That assessment should extend to the other essential services that now depend on connectivity, including government services, banking and food distribution.

Spectrum

The Green Paper says little about spectrum directly, although the supporting analysis sets out scenarios for the release of DTT spectrum under each date option.

Our members are broadly comfortable with a phased approach, in which the 600 MHz band is released first and the remaining spectrum follows. Two conditions apply. First, timing must align with international harmonisation and with the readiness of the device and equipment ecosystem: spectrum released before handsets and network equipment can use it delivers no benefit to anyone, and the value of the release depends materially on when it can actually be deployed. Mobile operators would welcome access to this spectrum on reasonable terms, but

the terms and the timing need to reflect deployment reality rather than fiscal convenience. Second, the release must be planned alongside PMSE requirements, as set out above.

Conclusion

The DCF supports the Government's objective of a well-managed transition to IP delivery of linear television. Our members will be central to delivering it, and we would rather help design it than respond to it.

We support 2034 as the active planning date, and we have set out the conditions on which that support rests: a publicly funded technical transition plan and audience support package; published and independently assessed readiness tests; a whole-chain resilience framework built on proportionality, equivalent measurement and responsibility following control; and a published cost allocation framework. These conditions are specific and testable by design, because a conditional position is only useful if the conditions can be verified.

A managed transition with these safeguards is preferable to unmanaged decline. It provides the long-term certainty needed for investment, avoids prolonging parallel legacy infrastructure, and supports a more modern, resilient and inclusive way for audiences to access public service content. But a successful transition cannot be assumed from broadband coverage alone. It depends on Government setting clear readiness tests, resolving policy barriers early, and ensuring that responsibility, funding and consumer protection are agreed before any final DTT switch-off decision is made.

We would welcome the opportunity to work with DCMS, Ofcom, broadcasters and the wider industry on the funding mechanism, the technical transition plan and the audience support programme, and would be pleased to provide further detail on any of the points above.