



**ANALYSIS OF COMMENTS ON GUIDELINES ON THE APPLICATIONS  
AND USAGE OF DVB IDENTIFIERS IN DTT NETWORKS IN KENYA**

S/ N	SECTION	NAME OF ENTITY	COMMENT	JUSTIFICATION	CA RESPONSE
1	Background Objectives Amendments Interpretations	Akili partners limited	<p><b>Q1A:</b> We fully support the background, objectives, and amendment period outlined, and we eagerly await the CA issuing unique LCN numbers for all broadcasters as an addendum to our FTA broadcast license. This process is long overdue, and we believe it cannot happen soon enough.</p> <p><b>Q1B:</b> If the CA (Communications Authority) wishes to actively promote DTT in Kenya, we would suggest that the CA consider introducing a Conformance Logo for the two specified set-top box standards in Kenya:</p> <ul style="list-style-type: none"> <li>• Standard DVB-T2 receiver (supports SD and HD channels in H.264)</li> <li>• UHD DVB-T2 receiver (supports both SD/HD and UHD in HEVC, in addition to H.264 for SD/HD)</li> </ul> <p>This approach is widely adopted in other African countries, such as Ghana, which has introduced the 'Digital Ghana Thumb' logo. The logo is featured in marketing campaigns, encouraging consumers of Digital Terrestrial Television (DTT) services to “look for the logo” when purchasing digital TV equipment. It is designed to identify digital TV products and services that have been tested and found to conform to</p>		<p><b>Q1A.</b> Noted</p> <p><b>Q1B.</b> The Communications Authority (CA) of Kenya enforces technical compliance through type approval processes thus Kenya’s regulatory strategy is well-structured to ensure digital TV receiver are compliant without the need for a conformance logo.</p> <p><b>Q1C. Adopted (d).</b> HbbTV definition has been aligned to the HbbTV standard.</p> <p><b>(e).</b> The Definition of Multimedia Hypermedia Experts Group (MHEG) has been removed</p> <p><b>(g).</b> The definition of hybrid channels has been reworded for clarity.</p>

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			<p>Ghana's technical specifications.</p> <p><b>Q1C:</b> With regard to section 4, Interpretations: d) The definition of "Hybrid Broadcast Broadband TV (HbbTV)" appears to be somewhat unclear and does not align with the definition specified by the HbbTV organization for their standard. Please note that this interactive TV specification, HbbTV, refers to the broadband delivery of entertainment services to consumers via connected TVs and set-top boxes (via the AIT table). This means over the open internet, which complements broadcast delivery via DTT. e) The "Multimedia Hypermedia Experts Group (MHEG)" is an outdated standard that is no longer in use. It would be beneficial to remove this, as it is no longer relevant. g) The definition of "Hybrid Channels" as channels carried on both the free-to-air and pay platforms is imprecise and unclear. A rewording would be helpful to clearly indicate the intended meaning.</p>		
		Nation Media Group	<p><b>Q1A.</b> yes  <b>Q1B.</b> Distributors should improve quality of service.  <b>Q1C.</b> Most signal distributor use technology and bandwidth allocation that would not be acceptable to content providers. it should be improved.</p>	<p>Poor signal quality on public signal distributors or National distributors compared to other non-commercial DTT- distributors</p>	<p><b>Q1A.</b> Noted  <b>Q1B &amp; Q1C.</b> The existing regulatory framework already ensures that all signal distributors adhere to technical standards that guarantee uniform and high-quality</p>

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					service delivery. CA ensures that all distributors comply with set quality standards through strict monitoring and enforcement measures.
		GOTv Kenya Limited	Q1A. Yes Q1B. None Q1C. None		Noted
		Signs media Kenya limited	Yes, we agree with the background, objectives, interpretations, and legal framework as they provide a structured approach to standardizing channel identification in Digital Terrestrial Television (DTT) Networks. However, the guidelines should also recognize accessibility needs for special interest groups, including disability-focused broadcasters like Signs TV.	The inclusion of accessibility provisions would enhance inclusivity by ensuring that Sign Language content and disability-friendly programming have a designated category, making them easier to find and navigate.	Not adopted The requirement for Inclusive broadcasting is provided for in Kenya Gazette Vol. CXX -18 of 13 <sup>th</sup> June 2018, Notice No.-6964 on- Additional Requirements for Broadcasting Service Providers on Enhancing Accessibility of Broadcasting Services to Persons with Disabilities PWDs.
		Rongo University	Q1A.Yes Q1B.None Q1C.N/a	Q1A.The document is well-structured, aligns with regulatory requirements, and addresses key issues in DVB Identifiers implementation. Q1B.The harmonization initiative is	Noted

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				sufficient in its current form. Q1C. No further comments.	
		Light FM	Yes  Introduce billing and a way of generating revenue	Conflicts will be minimal if each network operator has unique ONID.  Local Content Promotion – Encouraging more Kenyan content to attract viewers.	This is to clarify that ONID is uniquely assigned as per Section 6, to enable recognition of broadcast from Kenya. Local content promotion is encouraged through existing policies and under Section 8.4 of this guidelines where channels will be classified based on genre of programs.
		CAPE MEDIA LIMITED( TV47) CHASIOC OMMUNICATIONS RADIO47	<b>Q1A:</b> We generally agree with the background, objectives, and legal framework outlined. However, we request further clarity on the amendment period and any transitional provisions to ensure broadcasters can adjust accordingly. <b>Q1B:</b> In addition to harmonizing channel identifiers, we recommend A public education campaign to inform viewers about changes in channel numbers. Regular stakeholder meetings to address technical challenges during implementation. <b>Q1C:</b> No additional comments at this time		<b>Q1A.</b> The amendment process is covered under Section 3, ensuring periodic updates to align with industry developments.  <b>Q1B .</b> The implementation guideline will include sensitization of broadcasters which is carried out by the Authority annually. Broadcasters will be responsible in informing viewers about changes in channel numbers.

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		PANG	<p>Q1A: Yes</p> <p>Q1B: Integrating internet services with DTT can offer hybrid solutions, combining live TV and on-demand content, while enabling mobile access for urban, mobile-first audiences to enjoy seamless viewing on the go.</p> <p>Q1C: Offer flexible subscription models and expand DTT coverage to rural areas, ensuring accessible, high-quality content for all audiences.</p>	<p>Q1B.Integrating internet services with DTT provides a versatile viewing experience, allowing urban, mobile-first audiences to access both live TV and on-demand content, offering greater convenience and flexibility for today’s digital consumption habits.</p> <p>Q1C: Offering flexible subscription models and expanding DTT coverage to rural areas ensures that content is affordable and accessible to a wider audience, bridging the digital divide and meeting diverse consumer needs across urban and underserved regions.</p>	<p>Q1A: Noted</p> <p>Q1B: Noted</p> <p>Q1C: The Authority is exploring ways of expanding DTT coverage through USF and licence rollout requirements. For flexible subscriptions, the Subscription provider are at liberty to adopt any model for their business.</p>
2	Original Network Identity & Network Identity	Akili Partners Limited	<p>Q2A: Original Network Identity</p> <p>Currently, in Kenya, there is widespread confusion due to the arbitrary assignment of FTA TV channel numbers across different devices. This issue arises from each of the five (now four) DTT</p>		<p>Q2A. The CA will harmonize allocation of channel numbering across all devices to enhance user experience and eliminate technical</p>

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			<p>operators using its own Original Network ID (ONID), upon which Logical Channel Numbers (LCNs) are based. It is therefore essential that all licensed broadcast signal distributors be required to adopt Kenya's assigned Original Network ID, 0x2194 (8596), across their networks. The implementation of the assigned ONID on SIGNET and ADLN should be straightforward, as they currently use randomly assigned ONID numbers. For GOtv Kenya Limited, this should also not pose a major challenge, despite the fact that GOtv Kenya Limited currently uses ONID 0x22c8 (8904), which GOtv Kenya Limited is also used in several other African countries. However, there is probably a technical challenge with the PANG DTT network, as it currently operates with an ONID that the PayTV operator StarTimes uses across multiple African markets. StarTimes PayTV settop boxes rely on this ONID 0x88 (136) to generate their channel list. It is important to note also that the channel numbering on their TV channels does not follow the LCN standard but instead uses other SI (Service Information) elements. Therefore, we strongly recommend that CA, at a minimum, require that all PANG multiplexes (MUX) carrying at least one FTA (Free-to-Air) TV channel be immediately assigned Kenya's official ONID, 0x2194 (8596). Additionally, CA could</p>		<p>issues caused by mismatched Original Network IDs. This has to be in line with the EN 300 468 by reference as well as the requirements of DVB Services Sàrl who acts as a registration authority for all DVB and MHP identifiers</p> <p>Q2B. Noted</p>

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			<p>consider allowing PANG to continue using StarTimes ONID 0x88 (136) on multiplexes that exclusively carry StarTimes pay TV channels for a transitional period. This would hopefully provide StarTimes with sufficient time to update the software in their Pay TV set-top boxes so that they generate channel lists based on LCN going forward. Network ID As a broadcaster, the specific allocation of Network IDs across different multiplexes is not particularly relevant to us. However, we recognize the importance of having them in place, as they significantly aid in troubleshooting. By using a measurement device, Network IDs allow for identifying whether an issue originates from a specific MFN transmitter or an SFN network. We therefore recommend that the allocation of Network IDs for each individual MFN and SFN network also be publicly disclosed, ensuring clarity on which Network ID corresponds to which MFN transmitter and SFN network.</p> <p>Q2B: No</p>		
		Nation Media Group	<p>Q2A. None Q2B. None</p>	Not applicable	Noted



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		GOtv Kenya Limited	Q2A. None, it is in line with DVB framework. Q2B. We currently use 8904 as the Network identity allocations and cannot change the current ID given this is the same Network ID that is used across different countries		Not Adopted Q2B. All broadcast in Kenya shall adopt Kenya assigned Original Network ID.
		Signs Media Kenya Limited	The allocation of Original Network Identity (ONID) and Network Identity (NID) is crucial for organizing digital broadcasting in Kenya. However, there should be special provisions for broadcasters serving marginalized communities, such as Deaf and disability-focused channels, to ensure they are not overlooked in Network Identity	These identifiers play a role in how channels are structured within the DTT system. Ensuring Disability and Deaf Culture content has a clear placement will improve accessibility and visibility.	Not Adopted. The allocation framework ensures fair distribution among all broadcasters as per the assigned Original Network ID (ONID) and Network Identity (NI) allocations under Sections 6 and 7. The framework maintains neutrality and consistency in signal distribution.
		Rongo University	These are sufficient  N/A	The assigned identifiers ensure proper allocation and regulation.  No additional input needed.	Noted
		Light FM	Q2A. -Network identity is not consistent.	Provide different numbers but within a common	The adopted range for DVB Identifiers is international

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			Q2B. -Ensure the numbers are not similar/duplicated.	range for ease of reference.	allocated range for Kenya. The numbering system follows structured assignments to prevent conflicts
		Cape media limited(tv47) chasio communications radio47	<p><b>Q2A:</b> We seek clarification on how Network ID and ONID will be assigned and whether broadcasters will need to adjust their configurations.</p> <p><b>Q2B:</b> We suggest a phased implementation approach with a pilot phase to ensure smooth adoption.</p>		<p><b>Q2A:</b> ONID and Network ID will only be applicable to Broadcast Signal Distributors.</p> <p><b>Q2B:</b> Implementation of ONID and Network ID is aligned with best practices</p>
		PANG	<p><b>Q2A:</b> Currently, these two parameters are hardcoded for PANG as 0x88 in Kenya's DTT terminals .</p> <p>The document mentions configuring a single Original Network ID with different Network IDs for different frequency points, which differs from PANG' current approach. PANG currently uses a single Network ID with different Original Network IDs for different frequency points, but all PANG frequency points share one Original Network ID. It is unclear whether the document is inaccurate or if this implementation deviates from DVB standards. Regardless, modifying these parameters would still require changes to both the frontend and terminals, as they are currently set to 0x88.</p>	Modifying these parameters would require changes to the frontend and upgrades to all set-top boxes (and possibly TVs) in Kenya's network. Due to the long operational history and the variety of models, modifying the software for multiple models and preparing corresponding upgrades would be time-consuming. Additionally, older models may no longer be maintainable,	Not Adopted Q2A. All broadcast in Kenya shall adopt Kenya assigned Original Network ID.

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				<p>potentially requiring customer replacements to implement the changes. Furthermore, both networks would need to coexist for a significant period, ensuring that devices can trigger upgrades with the existing 0x88 configuration while also being able to receive new programs after the upgrade. This is a complex issue that requires detailed discussion and planning, even from a purely technical perspective.</p>	
3	LCN Implementation	Akili Partners Limited	<p>Q3A: Broad audience appeal and strong viewership should also be key parameters when the CA assigns LCNs and compiles the channel list. Furthermore, we propose that the variable attribute "Channel Genre" (e.g., news, sports, entertainment) be revised to "Channel Type," as defined in Table 2.2 of Section 8.4.</p> <p>Q3B: To create an effective channel lineup that benefits viewers, it is essential to prioritize TV stations with broad audience appeal and strong viewership in</p>		<p>Not Adopted Q3A. Prioritizing LCNs based on audience size and language preference may disadvantage emerging or smaller broadcasters that offer diverse content. A competitive and diverse media environment requires equal opportunities for all broadcasters, not just</p>

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			<p>the two official languages, English and Swahili. These stations should be assigned LCN positions within the first nine slots (LCN 1–9). Channels with limited appeal, no measurable audience, and coverage restricted to Nairobi, or no digital presence should not occupy these prime positions.</p>		<p>those with historically high viewership. Channel Genre has been revised to Channel Type.</p> <p>Q3B: Prioritizing LCNs based on audience size and language preference may disadvantage emerging or smaller broadcasters that offer diverse content. A competitive and diverse media environment requires equal opportunities for all broadcasters, not just those with historically high viewership. Not Adopted</p>
		<p>Nation Media Group</p>	<p>Q3A. Priority should be given as per audience demand Q3B. Customer input and preference is key hence it should be taken considerations.</p>	<p>The end goal is/should be to serve the customer better</p>	<p>Not Adopted Q3A. The current LCN framework ensures fairness following a first-come, first-served allocation method preventing market dominance by a few players (section 8.1), this approach avoids bias in favor of already popular broadcasters while still allowing new entrants to compete, while allowing market forces to</p>

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					reward popular channels through strategic positioning within genres
		GOtv Kenya Limited	Q3A. None Q3B. None		Noted
		Signs Media Kenya Limited	The classification criteria are generally well-structured, but there is no specific category for Sign Language or Disability-inclusive content. We recommend the creation of an LCN category dedicated to Deaf-friendly broadcasting	A dedicated LCN for Sign Language and Deaf Culture content would ensure easy access for the Deaf community, aligning with Kenya's constitutional mandate on inclusivity and accessibility	Not Adopted The classification of LCNs is based on service types and genres, as outlined in Section 8. The established framework ensures structured channel organization, and all broadcasters must adhere to the same categorization criteria
		Rongo University	the proposed classification criteria for assigning LCNs is adequate for the current industry	The categorization of LCNs based on service type and genre simplifies access and improves user experience.	Noted
		Light FM	-Consistent LCNs structure is the more sustainable.	This system allows viewers to quickly find channels based on their category.	The Authority recognizes the value of logical grouping in enhancing user experience. The classification criteria are structured under <b>Section 8</b> , ensuring consistency and ease of navigation.
		Cape media	Q3A: We support the classification criteria for assigning		Q3A: LCN classification

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		limited(tv47) chasiocom munications radio47	LCNs but request additional details on how pay-tv and free-to-air (FTA) broadcasters will be differentiated.  Q3B: A clear appeal mechanism should be introduced for cases where broadcasters dispute their LCN allocation.		follows service types and channel genres as outlined in Section 8.  Q3B: The Authority will ensure clear differentiation where applicable and establish a dispute resolution process.
		PANG	Q3A: LCNs play a vital role in the broadcasting industry by providing a standardized, efficient way to organize channels. Q3B: The system ensures easy navigation for viewers with unique numerical identifiers and a consistent format. Variable attributes like channel genre, language, resolution, and location allow for a more personalized viewing experience. This structure enhances channel surfing, reduces confusion, and improves overall user satisfaction. In short, LCNs simplify channel access, improve efficiency, and create a seamless viewing experience for audiences. Devices can modify channel numbers by changing the Service ID on the frontend. This is operationally feasible. The specific LCN allocation method should be evaluated based on operational needs.		Q3A. Noted Q3B. Noted
4	LCN assignment methodology	Akili partners Limited	Q4A: No, we strongly disagree with the proposal that • "The assignment methodology shall be on a first-come, first-served basis for free-to-air channels. This means that the LCN numbers shall be assigned		Not Adopted Q4A: The first-come, first-served method offers a transparent and non-discriminatory way to allocate LCNs. It

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			<p>in the order of receiving the license applications and processing them to completion." This approach overlooks the broader needs of the broadcasting ecosystem and may result in an inefficient and counterproductive distribution of LCNs. Furthermore, as noted in Section 8.5, there is a different definition of "first-come, first-served basis" for free-to-air channels. We recommend ensuring consistency throughout the document regarding the methodology for assigning LCNs on a first-come, first-served basis. Q4B: We recommend that new free-to-air TV stations be assigned an LCN based on Channel Type—more on this later. For example, a new Vernacular channel broadcasting in Kikuyu should be assigned the first available LCN within the designated Vernacular LCN range for Kikuyu</p>		<p>removes subjective decision-making and ensures that all broadcasters have an equal chance based on their readiness and application approval, rather than external factors like perceived audience size or content type.</p> <p>Q4B: New free-to-air TV stations be assigned an LCN based on Channel Type as per section 8.5.</p>
		Nation Media Group	None		Noted
		GOtv Kenya Limited	<p>Q4A. We are in agreement with the first come first served methodology.</p> <p>Q4B with regard to alternative approaches, implementing the DVB guidelines in Kenya will require broadcasters to make several technical adjustments. 1. Broadcasters will need to upgrade their existing systems to support the new DVB identifiers, such as Original Network Identifier (ONID), Network ID range, and Logical Channel Numbers (LCNs). This may involve</p>		<p>Q4A. Noted</p> <p>Q4B. The Authority will consider on a case by case basis the modality of implementation of DVB guidelines by Licensee</p>

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			<p>updating software and hardware to ensure compatibility with the new standards.</p> <p>2. Broadcasters will need to configure their systems to assign and manage LCNs according to the guidelines. This includes setting up the correct ONID and Network ID range for their channels.</p> <p>3. The new DVB identifiers must be integrated with the existing broadcasting infrastructure. This might require modifications to the transmission equipment, headend systems, and middleware to ensure seamless operation.</p> <p>4. Before full implementation, broadcasters will need to conduct thorough testing and validation of the new DVB identifiers. This ensures that the identifiers are correctly assigned and that the channels are displayed accurately on viewers' devices.</p> <p>5. Technical staff will need training on the new guidelines and how to implement them effectively. This might involve workshops, training sessions, and ongoing support to address any issues that arise during the transition.</p> <p>6. Broadcasters will need to establish mechanisms for monitoring and ensuring compliance with the guidelines. This includes regular audits and checks to verify that the DVB identifiers are correctly implemented and maintained.</p>		
		Signs Media Kenya Limited	While the firstcome, first-served approach provides a fair system, priority consideration should be given to channels that serve	Since LCNs directly impact channel accessibility,	The first-come, first-served methodology ensures a transparent,



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			special groups such as Deaf and Disability communities.	prioritizing public interest content like Sign Language broadcasting will support inclusivity and diversity in digital television.	objective, and non-discriminatory process for assigning LCNs, as detailed in Section 8.1. In addition, channels will be classified based on channel types as per section 8.5
		Rongo University	Yes None	The approach is fair and ensures transparency. The current methodology is suitable.	Noted
		Light FM	No.  News programmes be given a common range of LCNs, the same applies to kids programs, entertainment and sports	Some broadcasters and regulatory bodies, such as the <b>Communications Authority of Kenya (CAK)</b> or <b>Ofcom (UK)</b> , often set these allocations for Free-to-Air (FTA) and Pay-Tv services.	The guidelines provides for channels to be classified based on channel types as per section 8.5
		Cape Media limited(TV 47) Chasiocommunications Radio47	Q4A: While the first-come, first-served methodology is practical, we suggest prioritizing national broadcasters and established free-to-air stations to ensure fair access. Q4B: An alternative could be a weighted system that considers content type, reach, and public interest.		Q4A. The first-come, first-served methodology, as outlined in Section 8.1, ensures fairness. Q4B: The Authority will continue evaluating ways to balance priority for public-interest content while maintaining equity.
		PANG	Q4A: The first-come, first-served method has some benefits, but it	The first-come, first-served	Q4A: The first-come, first-served

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			<p>may not be the fairest or most efficient solution in the long run.</p> <p>Q4B: Currently, DTT terminals only support one type of logical channel number (LCN) processing, which is the last three digits of the Service ID.</p>	<p>method is simple, but it may not be the fairest, as it gives an advantage to early broadcasters and can lead to an uneven distribution of channel numbers. A more balanced approach, based on content diversity or audience demand, would ensure fairer access for all broadcasters, including newer ones.</p>	<p>methodology ensures a transparent, objective, and non-discriminatory process for assigning LCNs. In addition, channels will be classified based on channel types as per section 8.5</p>
5	Billing and Charging for LCNs	Akili Partners Limited	<p>Q5A. This is a highly concerning proposal. Kenya, as the only regulator in the world, is contemplating the concept of "Premium LCNs," where broadcasters could essentially purchase a potentially more favorable LCN. LCNs should be allocated in a fair, non-discriminatory, and viewercentric manner that prioritizes the needs of the Kenyan audience. They should be assigned simultaneously with the issuance of an FTA broadcast license as part of the licensing process</p>		<p>Q5A. The Section 8.2 will be reviewed and the provision for premium LCNs removed</p>
		Nation Media Group	<p>Q5A. They should be provided free of charge. Promote the industry growth.</p>	<p>Too many charges may discourage new players. The Authority should support the process</p>	<p>Q5A. The Authority will absorb administrative costs for LCNs. This approach supports industry growth by ensuring fair access while maintaining a</p>

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					sustainable regulatory framework for all broadcasters.
		GOTV Kenya Limited	We are in agreement with the proposed approach		Noted
		Signs Media Kenya Limited	Billing should not financially disadvantage social enterprise broadcasters like Signs Media Kenya Limited, whose mission is educational and accessibility focused. Fees for premium LCNs should be waived or subsidized for such broadcasters.	Charging high fees for LCNs could limit the availability of inclusive broadcasting, reducing accessibility for marginalized communities.	Q5A. The Authority will absorb administrative costs for LCNs. This approach supports industry growth by ensuring fair access while maintaining a sustainable regulatory framework for all broadcasters
		Rongo University	it's fair in the current market and industry dynamics N/A	The administrative cost allocation is reasonable and justified.  No further comments.	Noted
		Light FM	Billing for LCNs should be fair, transparent, and based on factors like viewership, demand, and channel category.	High-demand slots (e.g., prime LCNs) may cost more, but pricing should not disadvantage smaller broadcasters.	Q5A. The Authority will absorb administrative costs for LCNs. This approach supports industry growth by ensuring fair access while maintaining a sustainable regulatory framework for all broadcasters
		Cape media limited(tv47)	Q5A: We recommend full transparency on the billing structure to ensure affordability for smaller broadcasters.		Q5A: LCN billing is provided under Section 8.3 and follows a

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		chasiocommunications radio47	Q5B: Consideration should be given to a tiered pricing model based on audience reach and operational scale.		standardized framework. Q5B:
		PANG	<p>Q5A: Charging for LCNs could create inequality, especially for smaller broadcasters. Fees should be transparent and based on factors like viewership, not just financial ability.</p> <p>Q5B: Charging for LCNs must balance with public access needs, ensuring that fees don't limit access to essential educational and entertainment content. and High fees may discourage new or smaller broadcasters, limiting content variety. A flexible, tiered pricing model could encourage diversity.</p>		<p>Q5A: The guidelines does not propose any charging of LCNs. The Authority will absorb any associated administrative costs on management of LCNs.</p> <p>Q5B: The guidelines does not propose any charging of LCNs. The Authority will absorb any associated administrative costs on management of LCNs.</p>
6	Service types and TV Channel types	Akili partners Limited	<p>Q6A. Service Type Category We would like to highlight that it is our belief that radio services should belong under The Core Services category. As stated, the Complementary Services are defined as non-linear hybrid services accessible through the DTT platform over the receiver but without programming content. In light of this, we propose that the service type "The Core TV services" be renamed to "The Core Services" and that Radio services be moved under this category. Please note that we are referring to "Radio service" rather than "audio service."</p> <p>Additionally, the phrase "These are the traditional linear TV services" should be revised to "These are the traditional linear</p>		<p>Not Adopted</p> <p>Q6A. Radio services should remain separate from <b>Core TV Service</b> because they operate under distinct technical, regulatory, and content frameworks. Unlike TV, radio is audio-only and serves a different audience engagement model. Merging them could create licensing confusion and complicate content classification, affecting both broadcasters and regulatory oversight.</p>

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			<p>TV and radio services." Service Type Details The heading "Service Type details" seems somewhat misleading. It appears the CA is discussing license types rather than service types details. We suggest that the heading be revised to "License Type" to provide clearer understanding of the subject matter.</p> <p><b>Table 2.1 License types.</b></p> <p><b>Table 2.2 Program Channel Types for the Core TV Services</b></p> <p>The current classification of Channel Types appears to conflate different concepts. A public TV station is not a Channel Type but rather a licensing category.</p> <p>To bring clarity and consistency, we propose the following 17 Channel Types:</p> <ol style="list-style-type: none"> <li>1. General Entertainment Public Channels</li> <li>2. General Entertainment Channels</li> <li>3. Family Channels</li> <li>4. Children's Channels</li> <li>5. News and Information Channels</li> <li>6. Music Channels</li> <li>7. Lifestyle and Youth Culture Channels</li> <li>8. Documentary Channels</li> <li>9. Movie Channels</li> <li>10. Sports Channels</li> <li>11. University and Educational Channels</li> <li>12. Parliamentary Channels</li> <li>13. Religious Channels</li> <li>14. Vernacular Channels</li> <li>15. Local Channels</li> <li>16. Community TV</li> <li>17. Radio Service</li> </ol>		<p>The term <b>Service Type Details</b> is broader and more inclusive than <b>License Type</b>, as it covers both licensing and operational aspects of broadcasting. Changing it to <b>License Type</b> may oversimplify the classification system and exclude critical service-related distinctions, making it harder to differentiate between content delivery models and regulatory requirements.</p>

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			<p>For a more detailed definition of these Channel Types, please refer to Annex 1. For the five public TV stations in Kenya, our understanding is that the Channel Types are as follows:</p> <ul style="list-style-type: none"> <li>• KBC 1 → General Entertainment Public TV Stations</li> <li>• Y-254 (KBC) → Lifestyle and Youth Culture Channels</li> <li>• Heritage TV (KBC) → Documentary TV Channels</li> <li>• Bunge TV (PBU) &amp; Senate TV (PBU) → Parliamentary Channel</li> </ul> <p>Observation: We have noticed that "Channel Types" is sometimes referred to as "Program Channel Types." Since we are not discussing individual programs but rather TV stations, and to ensure consistency throughout the document, we recommend that the term Channel Types be used exclusively. Using both terms interchangeably may cause unnecessary confusion</p>		
		Nation Media Group	<p>This is all good No additional Comments</p> <p>None</p>	Not Applicable	Noted
		GOtv Kenya Limited	<p>Q6A. We follow the DVB guidelines and we would request further clarity how a channel type will be signaled in SI.</p>		<p>Q6A. Service Information (SI) signaling follows established digital broadcasting standards to ensure accurate identification and classification of channel types. As outlined in Section 8.4, the</p>

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					classification of service types and TV channel types provides a structured approach to organizing content on the DTT platform. Broadcasters are expected to align their SI signaling configurations with these classifications in accordance with regulatory guidelines.
		Signs Media Kenya Limited	The service types should include a specific category for Sign Languagebased programming	Creating a Deaf Culture/Sign Language Programming category would ensure recognition of this important content in Kenya's digital TV landscape	The classification system focuses on general service types, as described in Section 8.4. These categories apply uniformly to all broadcasters.
		Rongo University	Sufficient  N/A	The classification system is well-structured and caters to different viewer needs. No additional comments.	Noted
		Light FM	It is acceptable/workable as it is.	Good	Noted
		Cape media limited(tv47) chasiocommunications radio47	Q6A: The service types and TV channel classifications appear reasonable, but more details on how new entrants will be classified would be useful. Q6B: No additional comments at this time		Q6A. The service type framework under Section 8.4 provides classification guidelines. New entrants will be classified based on the outlined criteria.

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					Q6B. Noted
		PANG	<p>Q6A: Offering different service types (free-to-air, pay-per-view, subscription) gives viewers flexibility and choice based on their preferences and budget</p> <p>Q6B: A mix of content types (news, entertainment, sports) caters to diverse audiences, while niche channels target specific groups, ensuring broad and tailored content options.</p>		<p>Q6A. Noted</p> <p>Q6B. Noted</p>
7	LCN assignment within Channel types	Akili Partners Limited	<p><b>Q7A Allocation of LCN Numbers for New and Existing Broadcasters</b></p> <p>For new broadcasters receiving a Free-to-Air (FTA) broadcast license, we fully support the proposed first come, first served approach. This ensures that the Communications Authority assigns the new broadcaster the lowest available LCN within the appropriate Channel Type range at the time of licensing. The assigned LCN should be explicitly stated in the broadcast license and remain valid for the entire license period—currently 10 years—as long as the broadcaster does not change its Channel Type category. For existing FTA broadcast license holders, we recommend that the regulator first allocate LCN numbers to operational broadcasters based on clear and fair criteria, rather than a firstcome, first-served approach. Once this process is complete, non-operational broadcasters with a valid license should be assigned the lowest available LCN within</p>		<p><b>Q7A.</b> The first-come, first-served approach to LCN assignment is the most neutral and fair method, ensuring that all broadcasters have equal opportunities regardless of their financial capacity, audience size, or perceived importance. This method prevents regulatory bias and unnecessary delays in channel assignments, allowing the market to determine the success of broadcasters organically. If a broadcaster enters the industry later but gains high viewership, they can still build their audience without depending on</p>



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			<p>their Channel Type range, in the order in which they were licensed.</p> <p><b>Genres</b></p> <p>We seek clarification on the statement: "In addition, Genres shall be the basis for the grouping of Channels on the DTT platform to assist viewer navigation of content" (Section 8.5).</p> <p>Firstly, Table 2.2 already defines Channel Types, which serve as the foundation for grouping channels on the DTT platform to facilitate viewer navigation.</p> <p>Secondly, as outlined in Annex 1, the term Genres appears to be an inconsistent mix of different concepts, combining:</p> <ul style="list-style-type: none"> <li>• Five examples of Channel Types,</li> <li>• Three complementary services—streamed service channels, IP-delivered services, and interactive programming, and</li> <li>• The variable attribute of channel resolution (HD and SD).</li> </ul> <p>This classification raises several concerns:</p> <ol style="list-style-type: none"> <li>1. Defining certain Channel Types as Genres is redundant, as these are already clearly categorized.</li> <li>2. Including complementary services does not align with the LCN allocation process, as these are nonlinear hybrid services and technically cannot be assigned an LCN.</li> <li>3. Channel resolution (HD/SD) is already addressed in Section 8, and since a license holder is authorized to broadcast a single TV station, the HD and SD</li> </ol>		<p>preferential LCN placement. To ensure consistency throughout the document, we have renamed Annex 1 to: "Annex 1: Channel Type Categories", aligning it with the Channel Type categories</p> <p><b>Q7B.</b> Using Service Type instead of Channel Type for LCN allocation ensures flexibility, as broadcasters may diversify content over time. Restricting LCNs based on predefined Channel Types could hinder content evolution and limit broadcasters' ability to expand their services. Maintaining the existing approach also prevents unnecessary disruptions in numbering, ensuring consistency for viewers who are already familiar with the current structure.</p>

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			<p>versions of the same channel should share the same LCN. To ensure consistency throughout the document, we propose renaming Annex 1 to: "Annex 1: Channel Type Categories", aligning it with the 17 Channel Type categories referenced earlier.</p> <p><b>Q7B – Logical Channel Numbering Plan for Core Services</b></p> <p>Regarding the proposed Logical Channel Numbering Plan for Core Services (Table 3), we strongly disagree with the approach of assigning LCNs based on Service Type instead of Channel Type. Basing the numbering system on Service Type introduces inconsistencies and does not reflect how viewers navigate content. Using Channel Type as the foundation for LCN allocation ensures a more logical, structured, and viewer-friendly channel lineup. In particular, LCN positions 1–9 is of critical importance. To maximize viewer benefit and ensure an effective channel lineup, these prime positions should be reserved for TV stations with broad audience appeal for the entire Kenyan family. Specifically, these stations should:</p> <ul style="list-style-type: none"> <li>• Broadcast in the two official languages, English and Swahili,</li> <li>• Have national coverage, ensuring accessibility for all viewers, and</li> <li>• Offer content that resonates with a diverse audience across different demographics.</li> </ul>		

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			<p>Conversely, channels with limited appeal, no measurable audience, coverage restricted to Nairobi, and no digital presence on the internet should not occupy these priority slots. This approach ensures that the most widely watched and accessible stations are easily available to the majority of viewers, enhancing both content discoverability and viewer satisfaction.</p> <p>To support this principle, we have included a revised Logical Channel Numbering Plan in Annex 2, structured around Channel Types to provide a fair and transparent allocation framework that prioritizes viewer needs</p>		
		Nation Media Group	This is all good no additional a comments	Not Applicable	Noted
		GOTV Kenya Limited	Q7A. Pay TV operators often prefer to bundle all their channel allocations together within a paid bouquet. This way, consumers can easily find and enjoy their content without having to navigate through different sections. Bundling channels in a cohesive manner enhances the user experience and can help retain customers by providing a more streamlined and user-friendly service		<b>Q7A.</b> Section 8.10 provided for allocation of a range of LCNs to subscription service providers
		Signs Media Kenya Limited	The guidelines should allocate specific LCN ranges for accessibility focused channels, ensuring they are grouped logically for easy navigation.	Grouping similar channels together improves user experience. Assigning a dedicated range for disability-focused	LCN assignments outlined in Section 8.5. where channels are grouped based on types.

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				programming would ensure accessibility.	
		Rongo University	these will better for easier identification  No further input.	Proper categorization simplifies navigation for viewers	Noted
		Light FM	Channels are easier to find when grouped logically.	It should be implemented. Local channels to be given their own range of LCN	LCN assignments outlined in Section 8.5. where channels are grouped based on types.
		Cape Media limited(TV 47) Chasiocommunications Radio47	Q7A: The proposed methodology seems fair, but we request clarity on whether regional channels will be assigned different LCN ranges.  Q7B: We recommend a review process to allow adjustments after implementation based on audience feedback.		Q7A: The LCN assignment methodology, as outlined in Section 8.5, employs a first-come, first-served approach to allocate the lowest available LCN within the designated channel type ranges.  Although the guidelines do not explicitly mention regional allocations, the structured grouping based on channel types (as detailed in Annex 1) provides a consistent framework for channel organization across all regions.  Q7B. Not Adopted

S/ N	SECTION	NAME OF ENTITY	COMMENT	JUSTIFICATION	CA RESPONSE
					<p>Regarding the review process based on audience feedback, the current regulatory framework already incorporates ongoing stakeholder engagement through periodic consultations and established communication channels. This ensures that any concerns, including those related to regional distribution, are considered as part of the overall regulatory oversight without committing to a formal post-implementation review process solely driven by audience feedback. In addition section 8.9 on allocation of replacement of LCNs provides broadcasters with a method for change of LCNs if the channel characteristic/type changes.</p>
		PANG	Q7A. LCN assignment within channel types should prioritize content organization for easy navigation. Assigning logical, consistent LCNs based on content categories (e.g., news, sports, entertainment) helps viewers		Q7A. This is already addressed in Section 8.5 that provides for channels to be classified based on channel types

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			<p>quickly find what they're interested in. It also ensures that niche and mainstream channels are clearly distinguished, improving user experience. Clear, intuitive LCN allocation benefits both broadcasters and viewers by making content easier to access and navigate.</p>		
8	<p>Application for Allocation Preconditions for Allocation of LCNs Principal Obligations for Broadcasters Allocation of Replacement LCNs</p>	<p>Akili Partners Limited</p>	<p>Q8A. Best practice for LCN number allocation is that all Free-to-Air services on DTT, whether radio or TV channels, should be assigned an LCN number when their broadcast license is granted. This LCN number should be a natural part of and clearly specified within the broadcaster's broadcast license.</p> <p>For current license holders, it would be beneficial during this transition period to have the assigned LCN number included as an addendum to their existing broadcast license.</p> <p>It's important to note that LCN is purely a technical matter. The various requirements, such as broadcasters needing to maintain and comply with all necessary consents, approvals, and licenses from third parties— including intellectual property rights holders, authorities, and regulatory bodies— are unrelated to the LCN allocation process. All of these requirements should, and already do, form part of the broadcaster's FTA license. Sections 8.6, 8.7, and 8.8 should be removed as they do not pertain to the allocation of an LCN number.</p>		<p><b>Adopted Q8A.</b> LCN number will be issued when broadcast license is granted and operational.</p> <p>Sections 8.6, 8.7, and 8.8 of the guidelines will be removed since they are catered for in the terms and conditions of the licence</p>

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		Nation Media Group	Q8A. None Q8B. Channel popularity, quality of content, coverage, customer input and preference.	The conditions for allocation of LCNs should be realistic and reasonable. The process of acquiring LCNs from the Authority should be transparent and seamless	<b>Q8B.</b> Basing LCN allocation on popularity and audience preference would create an unfair system, where well-established broadcasters secure all prime slots, making it nearly impossible for new entrants to gain visibility. This would reduce diversity in content offerings, as larger broadcasters would dominate key positions, limiting opportunities for regional, community, and emerging content providers. The main goal of LCN allocation is to ensure fairness, order, and compliance with regulations. CA already has realistic and reasonable conditions for LCN allocation, focusing on licensing, carriage agreements, and compliance to keep the process fair for all broadcasters. Additionally, pricing for LCNs is transparent, and any charges apply only to premium or

S/ N	SECTION	NAME OF ENTITY	COMMENT	JUSTIFICATION	CA RESPONSE
					additional services, ensuring a smooth and accessible process.
		GOTv Kenya Limited	We are in agreement with the process		Noted
		Signs Media Kenya Limited	The preconditions should include requirements for accessibility and inclusivity compliance in line with Kenya's legal framework on disability rights.	Broadcasters should be required to ensure accessibility measures, such as closed captioning and sign language interpretation, where applicable.	The requirement for Inclusive broadcasting is provided for in Kenya Gazette Notice No.-6964 of 2018 on-Additional Requirements for Broadcasting Service Providers on Enhancing Accessibility of Broadcasting Services to Persons with Disabilities PWDs.
		Rongo University	Sufficient and fair N/A	The guidelines outline clear requirements and ensure compliance.  No further suggestions.	Noted
		Light FM	A common numbering system ensures simplicity and reliability.	Number ranges should allow space for new channels based on the provided categories.	The proposed allocation of LCNs is aligned to best practice.
		Cape media limited(tv4 7)	Q8A: The application process should be simplified to minimize bureaucratic delays.		Q8A.The application and allocation process is provided under Sections 8.1 ,



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		chasiocom munication s radio47	Q8B: A grace period should be introduced for existing broadcasters to transition without penalties.		streamlines the application procedures while adhering to regulatory requirements. Q8B. Since they is no cost to broadcasters, a transition period may not be necessary. In addition, LCNs aims to enhance the viewer experience by making it easier for audiences to navigate channels, find content quickly, and understand the channel lineup.
		PANG	<p>Q8A: DTT terminals currently support three types: TV, Radio, and HD. Older terminals only support TV and Radio. Currently, only TV and Radio are configured in the field.</p> <p>Q8B: The types mentioned in the document differ significantly from the types supported by the terminal. It is unclear whether there is a misunderstanding. The types referred to here are those in the SDT (Service Description Table), where "Audio" corresponds to the Radio type. The other types appear to be more like channel categories, which might be implemented through channel number ranges. This can be configured by operations based on their needs by setting appropriate Service IDs.</p>		<p>Q8A. This is provided in Table 3. Logical Channel Numbering Plan for core services where audio services are allocated LCNs 750-799</p> <p>Q8B: This is provided in Table 3. Logical Channel Numbering Plan for core services where audio services are allocated LCNs 750-799</p>

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9	Allocations of LCNs to Subscription Service	Akili Partners Group	<p>Q9A: Best practice for the allocation of LCNs is that a subscription broadcast service operator should have the autonomy to determine and manage an LCN range assigned to the operator by the authority. This LCN range, for example 500 – 599, should be added as an addendum to the operator's existing subscription broadcasting service – terrestrial license. It is important to note that LCN is purely a technical matter, and various requirements for the subscription broadcast service operator regarding programming composition, approvals, or changes are not related to the allocation of LCNs. These requirements should and must be defined within the operator's existing subscription broadcasting service – terrestrial license. Points 3, 4, and 7 in section 8.4 should be removed, as they are irrelevant to the allocation of LCN numbers. Points 8 and 9 refer to requirements for DVB-T2 receivers, which are not relevant to the allocation of LCN numbers or LCN number ranges. These two points are about whether a DVB-T2 receiver meets the minimum technical requirements for DVB-T2 receivers for the Kenya market and should be enforced in that specific forum. Therefore, points 8 and 9 in section 8.4 should be removed, as they are irrelevant to the allocation of an LCN number.</p>		<p><b>Q9A. Adopted</b> Subscription broadcast service provided will have the autonomy to determine and manage an LCN range assigned to the them by Authority. Therefore, points 3, 4, 7 8 and 9 in section 8.4 have to be removed</p>

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		Nations Media Group	No comment seems Okay	All good	Noted
		GOTV Kenya Limited	We are in agreement with the process.		Noted
		Signs Media Kenya Limited	Subscription providers should be mandated to include accessibility focused channels in their offerings and EPG (Electronic Program Guide) for easy access.	Ensuring subscription services include Sign Language content enhances accessibility for the Deaf.	The requirement for Inclusive broadcasting is provided for Kenya Gazette Notice No.- 6964 of 2018 on- Additional Requirements for Broadcasting Service Providers on Enhancing Accessibility of Broadcasting Services to Persons with Disabilities PWDs
		Rongo University	NO comment N/A	The existing framework appears adequate.  No additional comments.	Noted
		Light FM	Subscription is good to ensure the services are provided to level best, but should be done at a favorable price.	The stations will be running all through without any complications.	Noted
		Cape media limited(tv47) Chasiocom munications radio47	Q9A: We support the framework but suggest that allocation to subscription services should not disrupt FTA channel accessibility. Q9B: A clear distinction should be made between pay-TV and FTA services to avoid confusion.		Subscription service LCNs are managed separately under Section 8.10, while FTA are under section 8.5.
		PANG	Q9A: LCNs to subscription SP should ensure fair access and prevent monopolization of prime channel numbers. A transparent		Q9A: Subscription broadcast service provided will have the autonomy to

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			<p>and balanced process, possibly based on factors like content quality, audience size, and regional demand, would ensure a fair distribution.</p> <p>Q9B: Clear guidelines are necessary to prevent conflicts between providers and guarantee that subscribers can easily navigate between free-to-air and subscription-based channels</p>		<p>determine and manage an LCN range assigned to the them by Authority</p> <p>Q9B: FTA channels on Subscription platforms will conform to the LCN listing policy of the provider.</p>
1 0	LCN Vacation	Akili Partners Limited	<p>Q10A: Section 8.11, LCN Vacation, is not relevant to the allocation of an LCN number and should be removed entirely. It is important to note that a broadcaster's LCN number is and should be part of the broadcaster's FTA broadcasting license. As such, the LCN number, being part of this license, will automatically be revoked when the Communications Authority of Kenya withdraws an FTA broadcasting license.</p>		<p><b>Q10A.</b> The LCN vacation policy is necessary to prevent unused or inactive LCNs from blocking new broadcasters. Automatically revoking an LCN when a station shuts down ensures that valuable positions in the numbering scheme remain available for active broadcaster. Keeping a defined LCN vacation policy allows for better management and prevents situations where unused channels remain reserved indefinitely, limiting opportunities for new entrants.</p>
		Nation Media Group	<p>More clarification is needed e.g. what amounts to material breach which is a ground for material breach</p>	<p>Ambiguity may lead to inefficiency or compromise the process.</p>	<p><b>Q10A.</b> The criteria for material breach in LCN vacation are defined as violation of license terms such</p>

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					as failure to clear payment and engaging in fraudulent activities. Those who comply with the regulations have nothing to worry about, and those in violation are given clear steps to rectify issues before facing penalties.
		GOtv Kenya Limited	We are in agreement with the process		Noted
		Signs Media Kenya Limited	The LCN vacation rules should consider exemptions for social impact broadcasters, such as those serving the Deaf and disability communities, to ensure continued service	If LCN vacation occurs due to administrative issues, Deaf audiences may lose access to critical information and educational programming.	The vacation policy applies uniformly to all broadcasters, ensuring consistency in management and adherence to obligations, as outlined in Section 8.11.
		Rongo University	SUFFICIENT  NO	The guidelines ensure smooth transition and regulatory compliance.  The process is clear and does not require changes.	Noted
		Light FM	It's good.	Clear documentation and procedures are well articulated.	Noted
		Cape media limited(tv4 7) Chasiocom	Q10A: The method of LCN vacation should include a formal notification period to allow affected broadcasters to plan accordingly.		The LCN vacation process under Section 8.11 provides clear procedural guidance.

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		munications radio47	Q10B: Consideration should be given to allowing temporary reassignment of vacated LCNs to ensure channel availability.		The Authority will ensure a structured notification timeline.
		PANG	Q10A: These clauses are fair and provide necessary safeguards to ensure broadcasters comply with their legal obligations. They outline clear procedures for vacating a Channel LCN if the broadcast license is withdrawn or expires, if carriage agreements lapse without a replacement, or if there's a material breach of the license terms. The requirement for written notice and a chance to remedy breaches ensures due process, while preventing unauthorized channels from airing. The terms are reasonable but could benefit from more precise timelines for notifications and conditions for suspension.		Q10A. The LCN vacation process under Section 8.11 provides clear procedural guidance. The Authority will ensure a structured notification timeline
1 1	Other General consultation Question	Akili Partners Limited	N/A	N/A	
		Nations Media Group	Yes, non-commercial DTT-providers are not well clarified or captured	E.g. how have you categorized ADNL a key player in the industry?	<b>Q11.</b> ADNL being licensed as a Self-provisioning Broadcast Signal Distributor will be required to implement ONID, Network IDs and channels on its platform be classified as per channel types (LCNs)

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		GOTV Kenya Limited	none		Noted
		Signs Media Kenya Limited	<p>Yes, the guidelines should explicitly recognize disability-inclusive broadcasting by:</p> <ul style="list-style-type: none"> <li>• Allocating an LCN category for Sign Language and Disability inclusive content.</li> <li>• Ensuring subsidized LCN fees for social enterprises focused on accessibility.</li> <li>• Mandating inclusion of Sign Language channels in These measures will align Kenya's DTT framework with international best practices for accessibility and inclusivity in broadcasting. Subscription TV services.</li> </ul>		The requirement for Inclusive broadcasting is provided for Gazette Notice No.- 6964 of 2018 on- Additional Requirements for Broadcasting Service Providers on Enhancing Accessibility of Broadcasting Services to Persons with Disabilities PWDs
		Rongo University	No	The document covers all necessary aspects	Noted
		Light FM	International channel should have unique numbers that are not similar to local channels.	This makes it easier to navigate.	The guidelines provides for channels originating outside Kenya to be differentiation with local channels. This approach maintains consistency while allowing viewers to locate channels efficiently.
		Cape media limited(tv47) Chasiocommunications radio47	<p>Q11. A dispute resolution framework should be explicitly outlined in the guidelines. The Authority should conduct periodic reviews to assess the effectiveness of LCN assignments and DVB identifier implementation. A stakeholder advisory panel could be set up to provide</p>		Dispute resolution and review mechanisms are recognized as key regulatory considerations. The Authority will maintain engagement with stakeholders within the existing

<b>S/ N</b>	<b>SECTION</b>	<b>NAME OF ENTITY</b>	<b>COMMENT</b>	<b>JUSTIFICATION</b>	<b>CA RESPONSE</b>
			ongoing feedback as the system is rolled out.		consultation framework.
		PANG	None		None
		Communications Authority of Kenya	Change title of consultation document from Guidelines on the application and usage of DVB Identifiers in Digital Terrestrial Television (DTT) Networks in Kenya to Framework for the application and usage of DVB Identifiers in Digital Terrestrial Television (DTT) Networks in Kenya	Aligned with the Statutory Instruments Act requirement	Title of the document changed to Framework for the application and usage of DVB Identifiers in Digital Terrestrial Television (DTT) Networks in Kenya