

Minimum prominence requirements for a primary user interface

Guidance for manufacturers

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Background

The TV prominence framework is intended to assist audiences to more easily locate and access Australian free-to-air broadcast television services and broadcasting video on demand (BVOD) apps on smart TVs and other similar streaming devices.

Section 130ZZN of the [Broadcasting Services Act 1992](#) (the BSA) requires that manufacturers only supply regulated television devices that meet certain minimum prominence requirements. These requirements are set out in the [Broadcasting Services \(Minimum Prominence Requirements\) Regulations 2024](#) (the Regulations). These requirements apply to devices manufactured and supplied after 10 January 2026.

The Australian Communications and Media Authority (ACMA) is responsible for overseeing and enforcing the TV prominence framework. This guidance, which is advisory only, seeks to both:

- assist manufacturers to understand and apply the minimum prominence requirements that specifically relate to the design of the primary user interface (PUI)
- outline the ACMA's considerations when assessing PUI requirements.

This document will be updated as needed to incorporate findings of research, address matters surfaced through compliance assessments and reflect the evolution of devices and interface designs.

Please note, this guidance does not provide an exhaustive list of all prominence requirements under the Regulations. This guidance is general in nature and does not impact the scope and application of the relevant legislative obligations.¹ Manufacturers that are subject to the TV prominence framework should seek their own legal advice about their obligations under the BSA.

The ACMA has separately produced [guidelines for manufacturers](#) to assist in identifying which devices need to comply with the TV prominence framework.

More information

Visit: acma.gov.au/australias-tv-prominence-framework

Email: CAMR@acma.gov.au (Content & Media Reform Section)

¹ For the avoidance of doubt, this guidance is not a legislative instrument made pursuant to subsection 130ZZL(3) of the BSA.

Key PUI requirements

This guidance addresses specific minimum prominence requirements in the Regulations that relate to how regulated television services, including the apps of these services (BVOD apps), are displayed on the primary user interface² (PUI) of a device.

These minimum requirements are:

1. BVOD apps must be visible without any user interaction (s 6(3)(c)).
2. BVOD apps must be a similar size and shape to other streaming apps (s 6(3)(d)).
3. BVOD apps must be in the same area of the PUI as other streaming apps (s 6(3)(e)).
4. For devices capable of receiving free-to-air television broadcasting services terrestrially (via an antenna or aerial), a single icon or visual representation must be available for users to access such services. This must be visible without any user interaction, and be of a similar size and shape to streaming apps (ss 7(2)(c)-(e)).

The ACMA will assess compliance against each of the requirements discussed below. The lists of ACMA considerations for each requirement is not exhaustive, and not all considerations may be relevant to each assessment.

These requirements do not prevent users from customising their PUI. If a user has taken action that brings a device out of compliance with the prominence framework, for example by moving or deleting a specific BVOD app after its initial installation, a manufacturer is no longer required to afford that particular service with prominence.³

There are other minimum prominence requirements not addressed by this guidance with which manufacturers also need to comply. These include a requirement to either pre-install or automatically download the BVOD apps the first time the device is connected to the internet, and for the BVOD apps to be updated whenever an update is made available by a regulated television service provider.

For devices capable of receiving television broadcasting services, all linear broadcast channels must appear in logical channel number (LCN)⁴ order. If the device has an electronic program guide (EPG), the broadcast channels must be identified by LCN, easily accessible, and provide accurate program information.⁵

Extracts of the Regulations are provided at [Appendix A](#) for reference.

² The PUI is defined in section 130ZZL of the *Broadcasting Services Act 1992* and refers to the 'home screen' or 'main screen' of the device and/or the main interface most commonly used to provide access to applications that make audiovisual content available on demand. For further discussion on the definition of the PUI, see the ACMA's December 2024 [consultation outcomes report](#).





³ See paragraph 130ZZN(2)(b), *Broadcasting Services Act 1992*. Prominence obligations remain in place for the other regulated television services that are unchanged by the user on the device, and all other regulated television devices.

⁴ Logical channel numbers identify television and radio services broadcast in Australia. See Free TV Australia's [Operational Practice 41 \(July 2024\)](#) for further guidance on logical channel numbering in Australia.

⁵ Including the name of the program, a brief description, the start and end times, and classification information.

Interpreting the graphics in this guidance

This document includes hypothetical, illustrated examples of TV devices with likely non-compliant PUI designs. The following colours signify different aspects of the PUI.

	The apps of regulated television services (' BVOD apps ') are indicated by light blue icons
	The apps of non-regulated other audio-visual services (' other streaming apps ') are indicated by dark blue icons
	The icon allowing users to access linear broadcast television services (' linear TV icon ') is indicated by a black icon
	Light grey shading indicates other content being displayed on a PUI, such as featured content panels or advertising

1. Visible without any user interaction

The BVOD apps must be **visible** on the PUI of the device without a user of the device being required to take **any action** (other than accessing the PUI).

The ACMA considers that home screen or PUI designs that require a user to scroll (either vertical or horizontal), open a folder, or take any other action in order to display the BVOD apps would not be compliant with this requirement.

There are currently 5 BVOD apps that are considered ‘regulated television services’ under the TV prominence framework:

- ABC iview
- SBS On Demand
- 7plus
- 9Now
- 10.

Each of these BVOD apps must be installed and appear ‘above the fold’, in full, on the PUI. These apps do not need to be grouped together and may appear in any order.

ACMA considerations

- Are all BVOD apps clearly visible on the PUI?⁶
- Are the icons of the BVOD apps easily identifiable? (Noting this may not always apply when apps are first being installed)
- Are any of the BVOD app icons partly obscured, hidden or cut off on the PUI?
- Are all BVOD apps visible every time a user accesses the PUI?
- Are there any design features (for example, colour, patterns, shading or animation) that impact the visibility of the BVOD apps?

⁶ Or all apps which a broadcaster has ‘offered’ for the device, noting that some broadcasters may choose not to develop a BVOD app for certain devices.



Examples of non-compliant PUIs – Not visible without interaction

Figure 1 (below) shows an interface that requires a user to open a folder to view the BVOD apps. As these apps are not visible on the PUI until a user navigates to the folder and selects to open it, the ACMA considers that this interface is likely non-compliant, as it requires user interaction.

Figure 1:

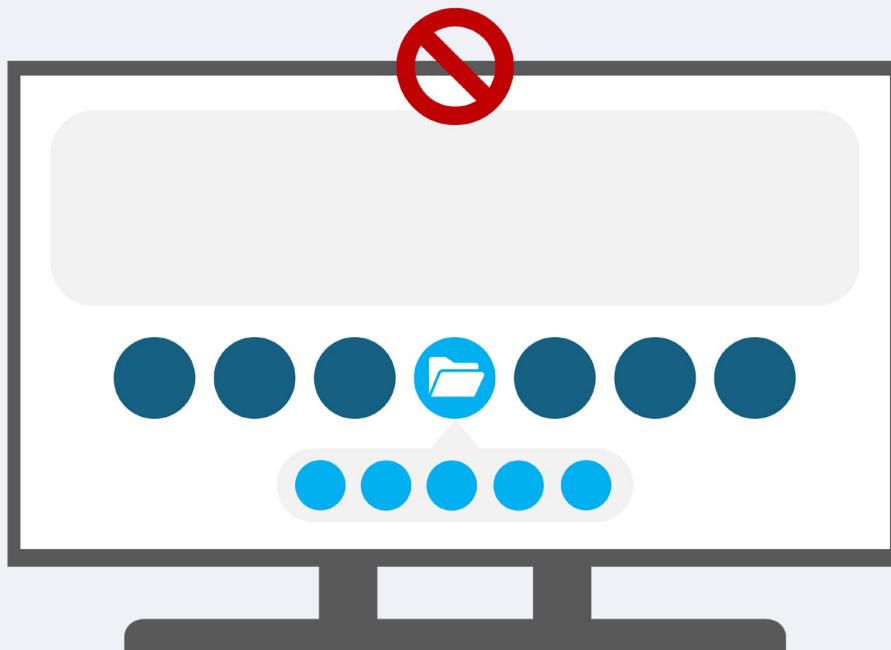
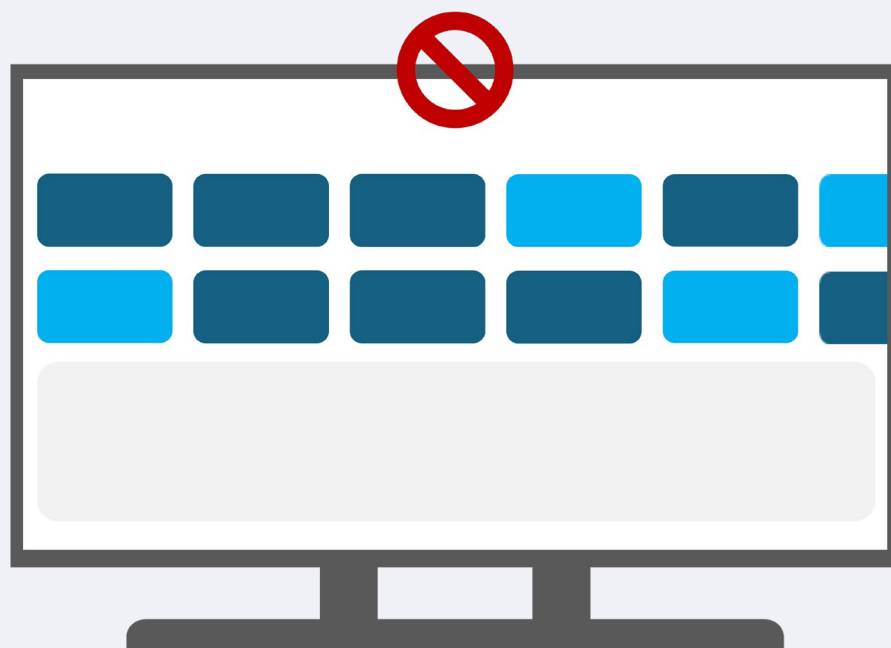


Figure 2 (below) shows an interface with only 4 of the 5 BVOD apps. One of the BVOD apps is also partially cut-off. As a user would need to scroll through the ribbon on the PUI to view all apps, the ACMA considers this interface is likely non-compliant, as it requires user interaction.

Figure 2:



2. Similar size and shape

The BVOD apps must be of a **similar size and shape** to other applications that:

- (i) are displayed on the PUI of the device, and
- (ii) are designed for the purposes of providing access to a service that makes audiovisual content available ('streaming apps').

Although the Regulations do not require BVOD apps to be the *same* size and shape as other streaming apps (only 'similar'), differences in app size cannot have the effect of giving lesser prominence to BVOD apps relative to other streaming apps.

ACMA considerations

- Would an ordinary user of the device notice a significant difference in size and/or shape between the BVOD apps and other streaming apps?
- Does any difference in size or shape appear to give greater prominence to other streaming apps, as compared with BVOD apps?
- Are all streaming apps relatively uniform in size and/or shape, or is there some variation?



Examples of non-compliant PUIs – Not similar size or shape

Figure 3 (below) shows a primary user interface where the BVOD apps are the same shape but are noticeably smaller than other video streaming apps. The ACMA considers this PUI is likely non-compliant, as the apps are not a similar size.

Figure 3:

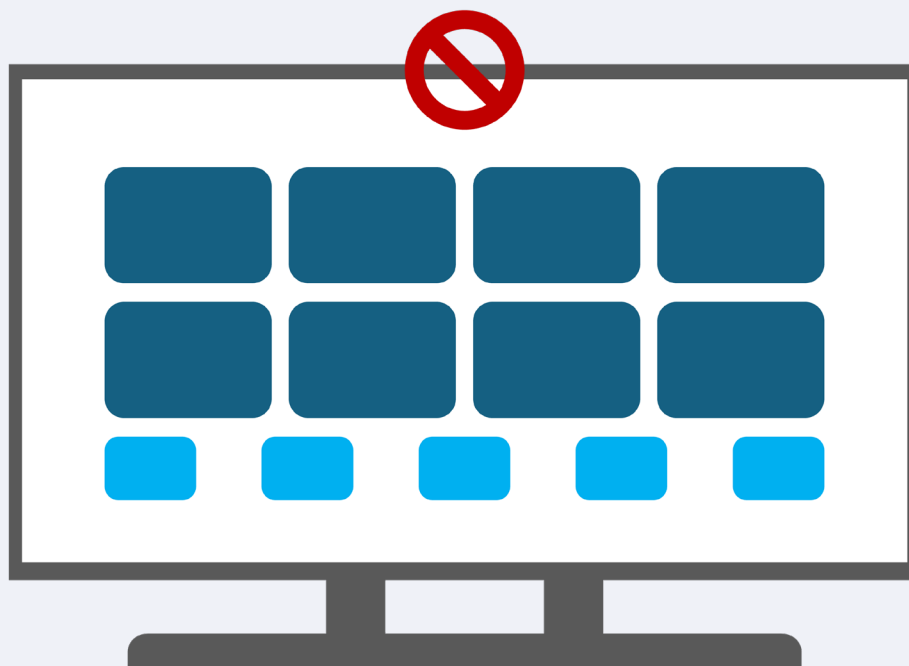
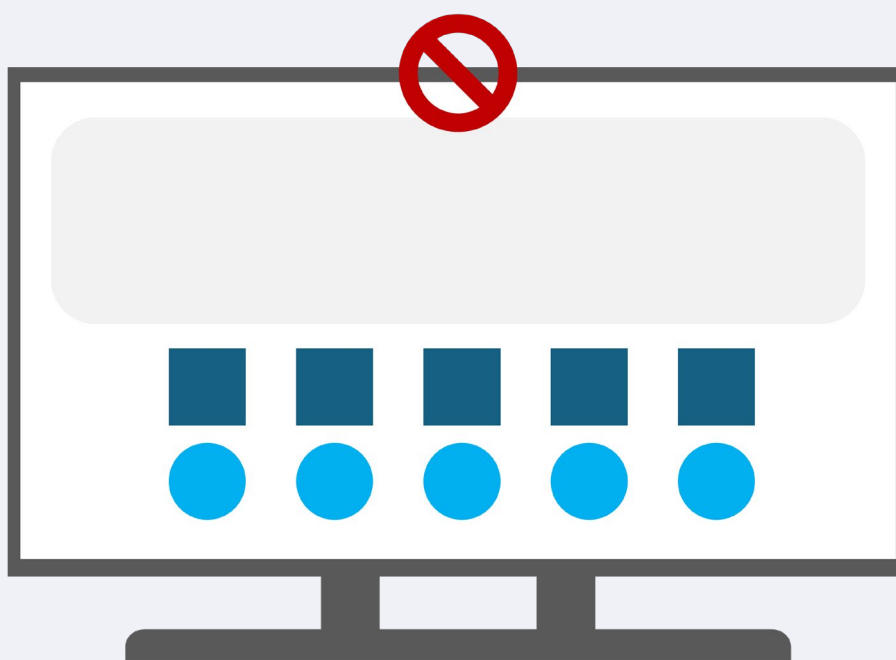


Figure 4 (below) shows a primary user interface where the BVOD apps are the same size but a different shape to the other video streaming apps. The ACMA considers this PUI is likely non-compliant as the apps are not a similar shape.

Figure 4:



3. Located in same area

The BVOD apps must be located in the **same area** of the PUI as other streaming apps.

The placement of apps on the PUI should not be used to give lesser prominence relative to other streaming apps. Home screen or PUI designs that require a user to navigate to a different, and/or visually distinct area of the screen to access the BVOD apps may not be compliant with this requirement.

ACMA considerations

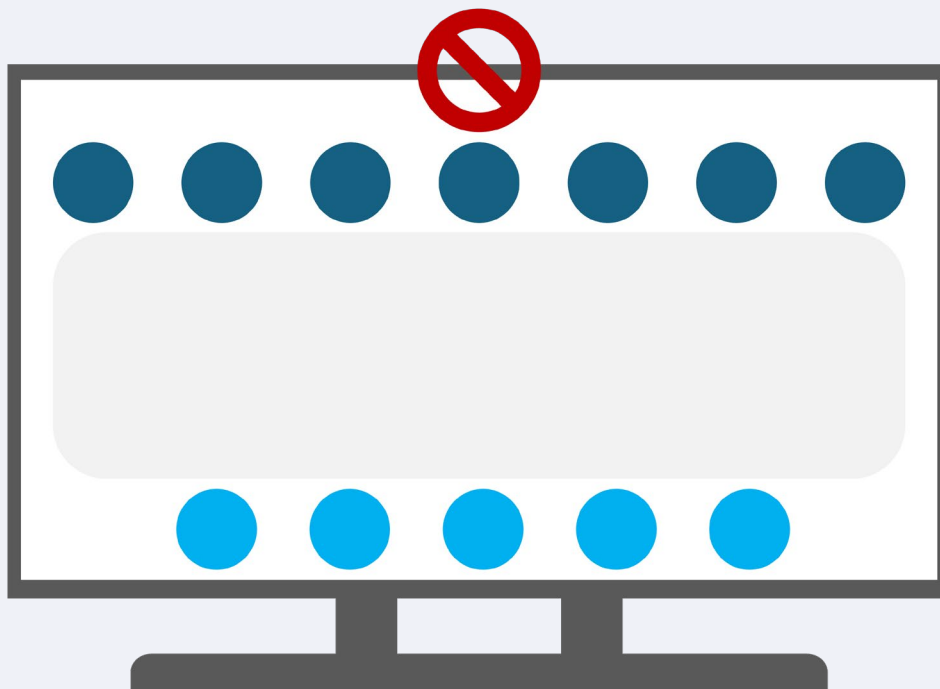
- Are there any visual indicators separating the BVOD apps from other streaming apps on the PUI (for example, headings, borders, shading, or banners)?
- Would an ordinary user of the device consider the BVOD apps and other streaming apps as appearing in visually distinct areas of the PUI?
- Does the location of BVOD apps give greater prominence to other streaming apps over BVOD apps (other than the general order/sequence of apps)?
- Does the location of BVOD apps make it more challenging to access the apps than other streaming apps (for example, requiring the user to navigate to a notably different area of the PUI)?
- Are all other streaming apps located in the same area, or are some afforded a more prominent location in a different and distinct area of the PUI?



Example of non-compliant PUI – Different area

Figure 5 (below) shows a primary user interface where the BVOD apps are separated from other streaming apps by a large 'hero' content banner. The ACMA considers this PUI is likely non-compliant due to the apps being displayed in different locations.

Figure 5:



4. Devices capable of receiving linear broadcast TV

If a device is capable of receiving free-to-air broadcast TV, the PUI must display a **single icon or visual representation** that provides users with access to linear TV broadcasting services ('linear TV icon').

The linear TV icon must be visible on the PUI without any user interaction and be of a similar size and shape to other streaming apps.

Devices that are *capable* of receiving free-to-air broadcast TV terrestrially (via an antenna or aerial) have additional PUI requirements.

The linear TV icon must be clearly visible on the PUI without any user interaction such as scrolling or clicking, and be of a similar size and shape to both the BVOD and other streaming apps. However, unlike the requirements for BVOD apps, the linear TV icon does not need to be in the same location as any other apps.

The linear TV icon can be a static image, an animation, or a live view of broadcast TV content. However, it must be evident to the ordinary user that selecting the icon allows them to access linear TV. Requiring the user to navigate to linear TV via an 'input' or 'source' icon, or via a separate menu, is unlikely to be compliant. Similarly, a dynamic icon that represents whichever input was last accessed by a user (for example, linear TV, HDMI1 and so on) is unlikely to be compliant.

The Regulations require that a user can access free-to-air broadcast TV services via a single linear TV icon or visual representation, and that they are identified and accessible using the service's logical channel number (including via the EPG, if there is an EPG on the device). The Regulations do not specify requirements for the design of the linear TV interface (that is, once the linear TV icon has been selected), nor whether other TV channels⁷ may be included alongside free-to-air broadcast TV services.

ACMA considerations

- Is the linear TV icon clearly visible on the PUI?
- Is the linear TV icon partly obscured, hidden or cut off on the PUI?
- Is the linear TV icon visible every time a user accesses the PUI?
- Is the linear TV icon of a similar size and shape to BVOD and other streaming apps?
- Would an ordinary user of the device understand that selecting the linear TV icon would allow them to access linear TV?

⁷ Such a manufacturer's own internet protocol (IP) TV channels or free ad-supported TV (FAST) services.



Examples on non-compliant PUIs – Inadequate linear TV icon

Figure 6 (below) shows a small 'LIVE TV' icon at the top, left-hand corner of the screen. While this placement is acceptable, the ACMA considers this PUI is likely non-compliant as the icon is noticeably smaller than the BVOD and other streaming apps.

Figure 6:

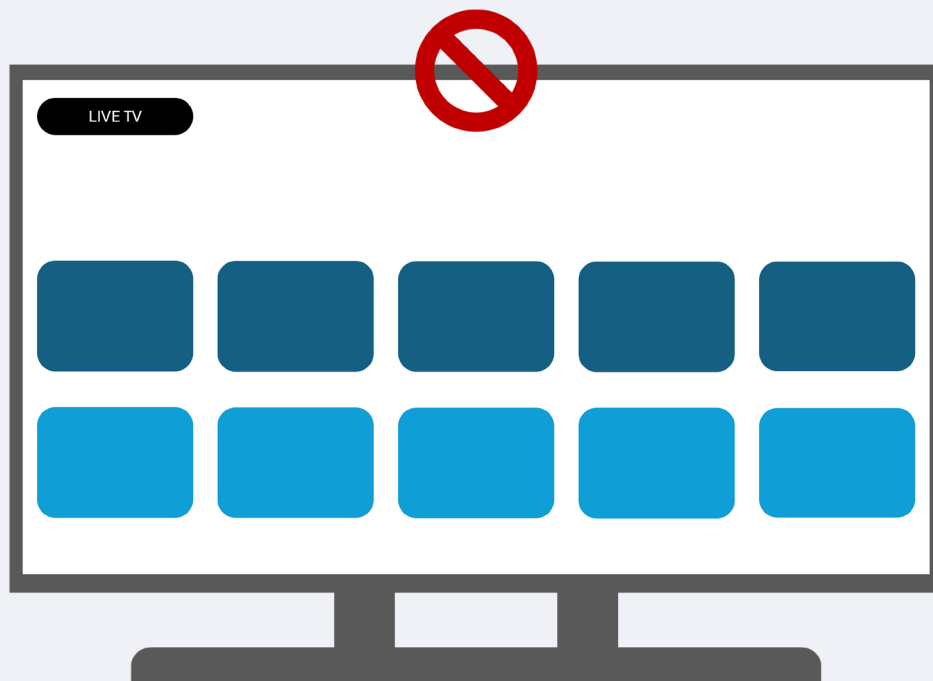
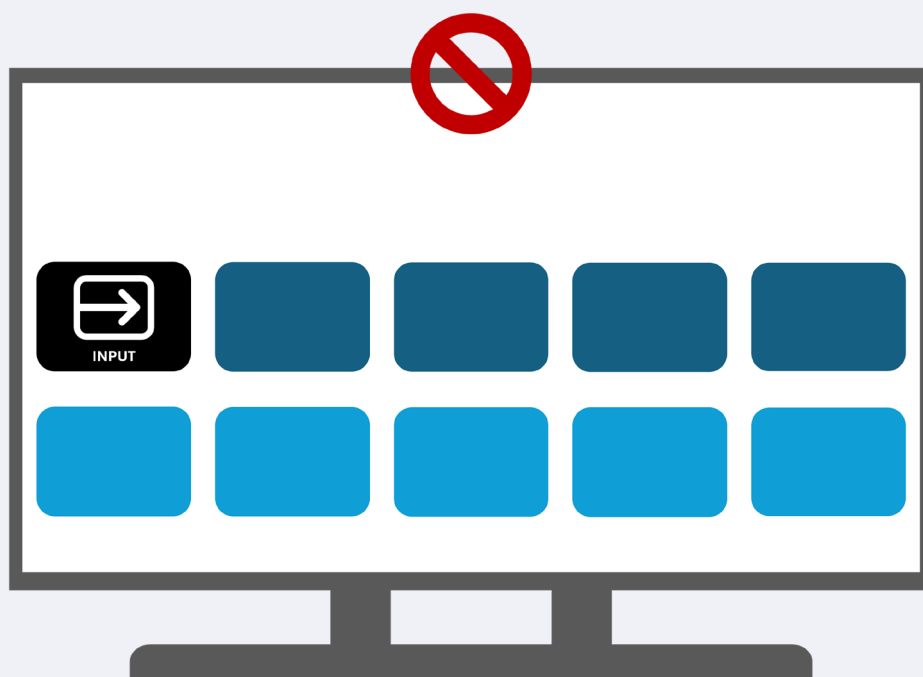


Figure 7 (below) requires a user to access linear broadcast TV via an 'input' icon that opens an input selection menu (for example, HDMI inputs). As there is no indication of how to access linear TV, and this process requires additional user interaction, the ACMA considers this PUI would likely be non-compliant.

Figure 7:



Appendix A: Minimum prominence requirements

6 Minimum prominence requirements

Scope

- (1) This section applies in relation to all regulated television devices.

Minimum prominence requirements

- (2) The device must comply with the requirements set out in subsection (3) in relation to each application that is designed for the purpose of providing access to:
 - (a) a broadcasting video on demand service mentioned in paragraph 130ZZJ(1)(b) of the Act; or
 - (b) a service prescribed by the Minister under subsection 130ZZJ(2) of the Act, if that service is a broadcasting video on demand service.
- (3) The requirements are all of the following:
 - (a) the application is either installed on the device before the device is supplied or will be installed when the device connects to the internet for the first time after the device is supplied;
 - (b) the application must be able to be updated when an update is made available by or on behalf of the provider of the regulated television service;
 - (c) the application must be visible on the primary user interface of the device without a user of the device being required to take any action (other than accessing the primary user interface of the device);
 - (d) the application must be of a similar size and shape to other applications that:
 - (i) are displayed on the primary user interface of the device; and
 - (ii) are designed for the purposes of providing access to a service (other than a regulated television service) that makes audiovisual content available using a listed carriage service;
 - (e) the application must be located in the same area of the primary user interface as those other applications.

7 Additional minimum prominence requirements for certain devices

Scope

- (1) This section applies in relation to a regulated television device if the device is capable of receiving a television broadcasting service that:
 - (a) uses the broadcasting services bands; and
 - (b) is either:
 - (i) mentioned in paragraph 130ZZJ(1)(a) of the Act; or
 - (ii) prescribed by the Minister under subsection 130ZZJ(2) of the Act.

Additional minimum prominence requirements for certain devices in relation to linear television broadcasting services

- (2) In addition to the requirements of section 6, the device must also comply with all of the following requirements:
 - (a) a user of the device must be able to access:

- (i) national television broadcasting services provided by the Australian Broadcasting Corporation; and
- (ii) national television broadcasting services provided by the Special Broadcasting Service Corporation; and
- (iii) if, at a particular time, a broadcasting service covered by subparagraph 130ZZJ(1)(a)(iii) or (iv) or paragraph 130ZZJ(1)(c) of the Act is transmitted in the licence area in which the device is located and is authorised by a licence to be so transmitted—each such service;
- (b) each of those services must be identified and accessible on the device using the service’s logical channel number;
- (c) the user must be able to access each of those services on the device by selecting a single icon or visual representation;
- (d) the single icon or visual representation must be visible on the primary user interface of the device without a user of the device being required to take any action (other than accessing the primary user interface of the device);
- (e) the single icon or visual representation must be of a similar size and shape to applications that:
 - (i) are displayed on the primary user interface of the device; and
 - (ii) are designed for the purposes of providing access to a service (other than a regulated television service) that makes audiovisual content available using a listed carriage service.

Additional minimum prominence requirements—electronic program guides

- (3) In addition to the requirements of subsection (2) and section 6, if there is an electronic program guide on the device, the device must also comply with each of the following requirements:
 - (a) the guide must be readily accessible on the device;
 - (b) a user of the device must be able to use the guide to access each of the following services:
 - (i) national television broadcasting services provided by the Australian Broadcasting Corporation;
 - (ii) national television broadcasting services provided by the Special Broadcasting Service Corporation;
 - (iii) if, at a particular time, a broadcasting service covered by subparagraph 130ZZJ(1)(a)(iii) or (iv) or paragraph 130ZZJ(1)(c) of the Act is transmitted in the licence area in which the device is located and is authorised by a licence to be so transmitted—each such service;
 - (c) each of those services must be identified in the guide using the service’s logical channel number;
 - (d) a user of the device at a particular time must be able to view a television program (a **live television program**) that is being broadcast on each such service, at that time, by selecting the program in the guide;
 - (e) the guide must be capable of accurately displaying, at a particular time, the information listed in subsection (4) of this section about each of the following:
 - (i) the live television program that is being broadcast on each such service at that time;
 - (ii) the television program that will be broadcast on each such service immediately after the live television program;
 - (iii) each television program that will be broadcast on each such service during the period of 7 days beginning from that time.

- (4) For the purposes of paragraph (3)(e), the information is:
- (a) the name of the television program; and
 - (b) the start and finish time of the television program; and
 - (c) a brief description of the television program; and
 - (d) the classification information of the television program.

Exceptions

- (5) The requirements in paragraphs (2)(b) and (3)(c) do not apply in relation to a regulated television device that is not capable of displaying a television program without being connected to other equipment.
- (6) The requirements in paragraphs (3)(d) and (e) do not apply in relation to a television program that is advertising or sponsorship matter (other than a television program that is broadcast on a television broadcasting service that exclusively broadcasts advertising or sponsorship matter).

Continuity of programs

- (7) For the purposes of paragraphs (3)(d) and (e), any break during the transmission of a television program for the purposes of the transmission of other matter is taken not to affect the continuity of the program.