

Submission by Channel 5 Broadcasting Ltd (Five) on Ofcom discussion paper “A new approach to public service content in the digital media age”

Five welcomes the opportunity to respond to this Ofcom discussion paper on the potential role of the Public Service Publisher (PSP).

While we recognise that much interesting thinking has gone into the paper, we are concerned that as now conceived the PSP is in danger of becoming characterised as a solution in search of a problem; while the underlying issues that gave rise to the idea of the PSP in the first place go unaddressed.

Five’s approach to the original PSP

When Five was first asked to comment on the PSP proposal (as part of the PSB Review in 2004), we welcomed the idea as an initiative that would help generate creative discussion about the future provision of public service broadcasting. However, we were sceptical about the proposal itself as well as the potential funding mechanisms.

We recognised then (and do still) that the commercial PSBs are likely to generate less public service broadcasting than at present as switchover approaches. There is likely to be some form of PSB ‘gap’ between what is provided now on terrestrial television and what will be provided at switchover.

There could well be a substantial reduction in the provision of ITV regional programming, an erosion of long-form journalism and an undermining of original children’s programming – to highlight three of the more obvious examples.

Five took the view that the original PSP, as a new “channel” offering three hours a day of original programming on an annual budget of £300 million, would be likely to seek to maximise its reach in peak viewing hours, even if new distribution models, including the Internet and DSL, were to be explored. We said this would have the inevitable effect of impairing the core businesses of the existing terrestrial PSBs.

Five was also anxious that, if the proposition was taken further, the PSP should not be allowed to take advertising or commercial sponsorship in any form. We were strongly of the view that should a broadcaster be awarded the PSP licence, cross-promotion between “legacy” channels (whether terrestrial or multi-channel) and the new service should not be allowed, as the other existing broadcasters would be threatened by a new channel benefiting from cross promotion from a direct competitor.

Ofcom’s current proposal

We recognise Ofcom remains keen to generate a debate over the creation of a PSP and has brought new thinking to how such a body would operate. Five will continue to participate in this debate. However, we remain sceptical of Ofcom’s current proposals.

Firstly, we do not see how the present proposals will address the ‘gap’ in PSB provision originally identified by Ofcom. We do not see how this new version of the PSP would be well-placed to counter a decline in regional programming, current affairs or children’s programming (to mention only those genres we highlighted earlier).

We also question whether there is a market failure in the on-line world that requires public intervention of the type a PSP would represent. A huge amount of material that might be judged ‘public service’ is already available on-line. For example, both broadcasters and newspapers are committed to developed news sites of quality and depth. Many initiatives from the arts organisations and the creative industries generally are geared towards providing an on-line experience. Public bodies from schools to the health service see the internet as a major forum for creativity and communication. There has been a massive growth in audio-visual content generated by ordinary citizens and posted on-line by them.

There may well be grounds for further public investment in on-line media, but it is not clear to us that the best way to approach this is via consideration of public service broadcasting. Moreover, content generation on new media is evolving at a fast pace, and it is not apparent what a PSP can contribute that may not evolve from other sources, including other publicly funded sources, by the time it is proposed to come into existence.

Conclusion

Like other broadcasters, Five recognises the importance of engaging with our viewers in new ways. New media is incredibly important to society and to the way people communicate and receive information and entertainment. We ignore it at our peril.

As far as our role as a public service broadcaster is concerned, Five believes the most important contribution we can make to the provision of public service material on new media platforms is through the on-line distribution of our current and library content.

We fail to see the logic of creating an organisation anchored in new media in order to plug a perceived gap in traditional broadcasting. Even if the case for a PSP focused on new media were accepted, questions would remain about the delivery of public service broadcasting on linear television. Answering those questions will involve quite different remedies, such as ensuring Channel 4 delivers fully on its public service remit.

Channel 5 Broadcasting Ltd

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