

The Potential Role of the Public Service Publisher

Submission by Fred J Perkins, Chief Executive, Information TV Ltd

Information TV Ltd was set up in 2004 as a “public service narrowcaster”, utilising an unusual TV broadcasting business model, aimed at allowing public bodies to utilise broadcast TV to reach their target audiences. Information TV provides blocks of airtime, “sponsored” by the client public body, but where the client is able to have total editorial control of the programme content (unlike the normal rules of TV programme sponsorship).

The idea for Information TV was inspired by Fred Perkins’ 7 years as CEO of The Stationery Office (TSO) – the publisher of government information. The vision was fairly simple, but radical: allow government departments to utilise the most compelling medium available - broadcast TV – to communicate to audiences, whether large or small, who wanted and needed to know what government had to say. Broadcasting started in 2004, and the business now operates 3 channels on the Sky satellite platform, plus broadband simulcast streaming. The business receives no grants or public funding, but charges its clients for airtime (by the hour) on a commercial basis.

We are therefore very familiar with the business of publishing. We could indeed claim to be the first “public service publisher”, since we “publish” on TV, on behalf of public bodies.

We support the notion of a Public Service Publisher, though we question some aspects of Ofcom’s developing model for the PSP. Fundamentally, we feel that the model which is emerging tries to adapt traditional broadcast infrastructure into a multiple-media world, rather than update and re-apply the original principles of public service broadcasting.

At its very simplest, PSB was seen as a means of ensuring that TV programmes which might not otherwise be created could reach audiences which might not otherwise see them – justified if there was societal benefit.

From its outset, PSB has been a form of market intervention. In the early days of television, the intervention took the form of public funding (the TV licence), “with strings”, of a national broadcaster. PSB arose at a time when a powerful new medium was seen as having great social benefits – as well as being a great new form of entertainment. TV had to be made available to as many of the population as possible.

When commercial television came along, in an environment of scarce spectrum, commercial broadcasters were given privileged and subsidised access to spectrum, in return for various PSB-related undertakings. At the same time, the market intervention began to include support beyond broadcasters alone to production companies; and other measures aimed at preserving “Britishness” in the face of an onslaught of TV programming from the USA.

Over the years, PSB’s original objectives have been largely forgotten, other than by some segments of the broadcasting industry for which quotas, subsidies, and regulatory controls constitute important means of sustaining the status quo. At the same time, *all* the main broadcasters – have relentlessly pursued viewer ratings as the measure of success; and indeed even Ofcom’s assessment of success in PSB somewhat perversely views ratings as a key criterion.

Although Ofcom’s research amongst viewers has been extremely interesting, it is clear that very few viewers have any real, or consistent, appreciation of what PSB actually is, other than “free”. For example, it is clear from Ofcom’s research that only a tiny minority recognise or value the regulatory intervention in terms of production quotas as being an attribute of PSB.

The dichotomy here is that in the pursuit of ratings, broadcasters have "dumbed-down" their output across the board. "Challenging" programming has to be popularised and sweetened for easy digestion. Is this what was intended and hoped for in PSB?

Today, in an era of digital media convergence, multichannel digital broadcasting, and technology innovation, the very pillars of the PSB regime struggle to survive. It cannot make sense any more to subsidise a large national broadcaster (whether the BBC or ITV) which is almost entirely motivated by ratings, and so "cannot justify" niche-interest programming – when there are smaller channels happy to cater for niche audiences and able to do so for a fraction of the cost, and still to high quality.

When citizens and viewers had little choice as to what they could view on TV, PSB obligations were crucial, to ensure that the medium was used effectively for the benefit of society. But when viewers have almost limitless choice, they will watch what they want to watch, *not* what the proponents of the PSB regime would like them to watch. The PSB model has to be radically re-thought.

The economics of broadcast TV, coupled with the emergence of new TV distribution technologies, means that there are now very low barriers to the realisation of the original PSB objectives. We already have many channels where the pursuit of mass-audience entertainment has been forgone, replaced by niche audience satisfaction – and often without any public intervention, subsidy or regulation.

It could indeed be argued that there is no longer a need for formal intervention to deliver the objectives of PSB. That is not to say that government (or society) should be prevented from public support of "worthy" causes, whether for cultural or other ends. However such intervention must stand up to the tests of market distortion. PSB should not be used to maintain legacy funding models for the benefit of organisations which are too lazy to recognise that their market has, and will continue to, change.

High quality, exportable, British audiovisual content can and will be created in the UK without the need for public support. If public support *is* provided, it surely should be on the basis of helping innovation and original content production, and not just to further enrich a small number of players carving up a continually increasing central public fund.

Broadcast television and the internet are converging in many ways. A major dilemma which Ofcom continues to face is the reconciliation of its own role in the face of the largely unregulated internet, with the heavily regulated broadcast TV markets. The features which Ofcom sees as desirable in the PSP – such as interactivity and participation – are features primarily enabled by the internet rather than by broadcast TV. Unless, therefore, Ofcom intends to engage more aggressively with regulation of the internet, it seems strange to suggest that it will promote substantial public funding – in the guise of PSB/PSP – towards what will increasingly be internet-driven capabilities. Further, the "flavour of the moment" developments such as podcasting, user-generated content, multiple-media distribution and so on – are developments which may or may not become mainstream, and will in any event be adopted by media organisations if they make sense. They do *not* need public funding for their development (any more than SMS did) – though of course industry will welcome any funding which is offered.

The Public Service Publisher proposition absolutely makes sense, as a likely vision of how **public service content, information and access will evolve**. That however does not necessarily make it a "vehicle" which should be separately identified and funded as a single entity. One of the great benefits of the emerging technologies is that ability to communicate effectively with niche audiences – sometimes very small, but in today's society becoming more deserving of recognition.

Public Service Publishing is already happening. The model has an already-existing and more-developed analogy in another part of “publishing” – Contract Publishing: where a body with something to say organises a means of reaching its target audience(s). Contract Publishers can be public- or private- sector, or a combination of both.

Above all, PSP is surely about how “*programmes*” are developed and funded – and emphatically *not* about how *broadcasters* are funded. The distribution and delivery technologies for such programmes are already evolving beyond broadcast TV alone, in line with all television broadcasting. The media revolution is one which is impacting all aspects of communication – not just TV broadcasting. The PSP – as Ofcom has observed – embraces several media channels.

We feel strongly that while the PSP is an extremely interesting notion, Ofcom should first go back to re-defining the objectives of intervention in what Public Service Broadcasting was, and how – if at all – these translate into our developing age. Then it should be possible to see to what extent intervention in *broadcasting* markets is required.

We look forward to participating in the ongoing debate.

Fred J Perkins

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