

S E I R B H E I S
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G À I D H L I G



Gaelic
Media
Service

PSP: a new approach to public service content in the digital media age

Response by Seirbheis nam Meadhanan Gàidhlig (Gaelic Media Service)

1. Introduction

1.1 An opportunity to comment

Gaelic Media Service (GMS) welcomes the opportunity to comment on “A new approach to public service content in the digital media age”. We note that this is a discussion paper, not a formal consultation, and that the next PSB review will take place in 2009-10. We will, of course, be willing to participate in further discussions and consultations on public service content in future.

1.2 Our work and remit

GMS is a publicly funded body established by statute and regulated by Ofcom. Our remit is to fund, commission or produce Gaelic language programmes for television, radio, on-line or new media and to engage in, or fund, the provision of training, development and audience research.

Our key aim is to create a sustainable Gaelic Digital Service, comprising a television channel and other media for launch in 2007. We have reached agreement with the BBC that both parties will work in partnership to create a new service that is vibrant, comprehensive, cost-effective and contemporary.

1.3 New media platforms

Creating a new channel on digital platforms allows GMS to embrace new media platforms and non-linear formats from the outset, while continuing to build on our experience of funding and commissioning Gaelic programmes for traditional linear broadcasting. In a multi-channel environment, we aim to deliver a distinctive and compelling offering that will be available on satellite, cable, terrestrial and online, and to investigate new ways of making our content available to people throughout Scotland. We also aim to encourage greater participation in Gaelic programmes and to create opportunities for making and broadcasting user-generated content.

1.4 A vision for Gaelic broadcasting

A limited range of Gaelic television programmes is currently broadcast on BBC and ITV, but the Gaelic Digital Service represents a new departure, with dedicated funding and a

substantial commitment from all stakeholders involved. It is a niche offering but will provide a wide and diverse range of programming and will embrace the best traditions of public service broadcasting, providing all persons in Scotland with high-quality programmes in Gaelic and an insight into Gaelic culture. The new channel's editorial policy will reflect the aspirations of Gaelic speakers in the 21st century, and its content will contribute to efforts to ensure Gaelic's vitality as a community language.

1.5 Challenges for future development

From 2007, the new channel will broadcast 1.5 hours of original content per day. Our aim is to double this output by 2012. We are aware of the challenges involved in achieving this target and in securing a sustainable future for the Gaelic Digital Service. Our partnership with the BBC will be reviewed within the first five years of the new channel's operations, and we are aware that the future of the BBC will also be the subject of much scrutiny and debate during this period. We are also mindful of the proposals for the digital dividend, and are anxious to ensure that spectrum is available for the carriage of public service content, including Gaelic content, on digital terrestrial television. Our overriding concern is to ensure that Gaelic broadcasting can continue to develop throughout this period and well into the future.

2. Public Service Broadcasting

2.1 The purposes of public service content

We note the purposes of public service content that Ofcom has identified:

- Inform ourselves and others and to increase our understanding of the world
- Reflect and strengthen our cultural identity
- Stimulate our interest in and knowledge of art, science, history and other topics
- Make us aware of different cultures and alternative viewpoints

We also note Ofcom's statement that the PSP "cannot simply support worthy causes based on a vague notion of public interest", but we believe that the Gaelic Digital Service will serve the purposes identified by Ofcom. Demand for a dedicated Gaelic channel is longstanding and well documented, its establishment is supported and funded by government, and the new channel is keenly anticipated by Gaelic audiences.

2.2 Characteristics of public service content

We note the characteristics of public service content that Ofcom has identified:

- High quality, well funded and well produced
- Original, new UK content rather than repeats or acquisitions
- Innovative, breaking new ideas or re-inventing exciting approaches, rather than copying old ones
- Challenging, making viewers think
- Engaging, remaining accessible and attractive to viewers
- Widely available

GMS will ensure that the content shown on the Gaelic Digital Service has these characteristics. However, we are aware of constraints and challenges that could affect the availability and accessibility of the channel, and believe that attention must be given to infrastructure and spectrum issues so as to ensure that the channel is available to all persons in Scotland.

2.3 Plurality

We note Ofcom's "Digital PSB" (July 2006), and we agree that there is a need for plurality of outlets, commissioning and production. We understand that the PSP is proposed in order to address the plurality deficit that has resulted from the reduction of PSB obligations in the commercial sector. GMS already works with many independent producers and welcomes the prospect of a wider range of production and broadcast interests being involved in the creating of PSB content.

2.4 Indigenous languages

We also note paragraph 3.28 of "Digital PSB":

"Increasing digital penetration is likely to extend the reach of [indigenous language] channels, currently unavailable to a large proportion of the UK population. As well as being likely to fuel further expenditure in PSB genres, this may well have the effect of encouraging new entrants and increasing diversity of PSB provision."

We are encouraged that Ofcom has recognised the importance of a system of interventions to support smaller providers such as S4C, which have developed niche propositions to deliver specific PSB purposes. We hope that GMS will continue to enjoy a fruitful relationship with Ofcom in developing our proposition for the Gaelic Digital Service, and that the specific purposes of the new channel's content will be recognised and supported.

3. The argument for a Public Service Publisher

3.1 Analysis of the situation

We note Ofcom's analysis that, although the market will provide greater variety, commercial broadcasters will resist pressure to broadcast less profitable public service content in a competitive marketplace, and we acknowledge that commercial broadcasters may not regard Gaelic content as attractive or profitable.

Ofcom has already allowed STV to reduce its obligations to broadcast Gaelic and other PSB offerings, such as religious programming, along with similar reductions in all ITV Channel 3 companies across the UK. GMS considers it vital that we find a way of replacing, and indeed enhancing, what has been lost, and the PSP could offer a solution.

We welcome Ofcom's recognition that support is needed for public service content, as the economic, social and citizen benefits that it delivers would not be realised without intervention.

3.2 Options for intervention

We note Ofcom's suggestion that there are various options for intervention on public service grounds: that it could be limited to linear television only, with funding focused on specific broadcasters or forms of content, including indigenous language services, or via targeted grants on a commission-by-commission basis; or that it could have an important digital media element.

This leaves open a wide range of possibilities, on which we offer some outline comments below.

4. Addressing Ofcom's four main points

4.1 The appropriate nature of intervention in the digital media age, and the balance between TV and non-TV forms of public service content distribution

GMS supports, in principle, the idea of a PSP and of its involvement in all platforms on which public service content can be distributed, rather than its being limited to any one medium.

We believe that there will continue to be a strong demand for the traditional linear television format, but we recognise that the changing viewing habits of some groups, particularly younger people, require us to make Gaelic content available on other platforms if we are to reach these parts of the audience. We aim to achieve the widest possible Scotland-wide reach for the new channel, with 98.5% coverage on DTT by 2012, as well as carriage on cable, satellite and on-line.

4.2 The potential role of the PSP and its creative remit

We support the suggestion that the PSP should have a strong commitment to indigenous language content in all genres. We note Ofcom's statement:

"We remain of the view that broadcasting in indigenous languages is an essential element of the UK PSB mix."¹

We welcome this view and are confident that the Gaelic Digital Service will enrich the public service broadcasting mix that is currently available.

News has been identified as the most valuable public service content, and the Gaelic Digital Service will carry news from the BBC. We note that the future of news was an important question considered in *Digital PSB* (July 2006). We will welcome opportunities to discuss with the BBC, the PSP and Ofcom the future of Gaelic news broadcasting, and will seek the views of our audience on our Gaelic news output.

¹ *Ofcom review of public service television broadcasting Phase 3 – Competition for quality*, February 2005
<http://www.ofcom.org.uk/consult/condocs/psb3/psb3.pdf>

We note Ofcom's in the discussion paper to "location sensitive" content. The Gaelic Digital Service represents an opportunity to offer unique content that is rooted in Gaelic culture and appealing to viewers throughout Scotland, and which can be created in the Western Isles or in other parts of Scotland.

We support the PSP's having a role in audience research and promotion of media literacy. Audience research is an important element of GMS's work, and we are aware of the need to inform people of the options that will be available to them, as participants as well as viewers, in the new digital age.

4.3 The operating model – in particular, the approach to rights management

GMS supports the suggestion that the PSP should be located outside London. We note the importance that Ofcom places on UK-generated content, rather than imported content. For our part, although we acknowledge that a good Gaelic programme could be made anywhere, we are proud of the fact that Gaelic broadcasting encourages the creation of Scottish-generated content.

We note the possibilities listed in the discussion paper for the PSP operating model – that it could be a commissioner, rather than a producer, of participative content, and that it could be designed specifically to deliver public purposes in new ways, embracing alternative licensing models and being "share aware". We also note the possibility of its operating on a non-commercial business model, or perhaps even an open rights model, and of its working with other organisations to achieve more effective distribution, reach and impact, acting as a "facilitation brand" and providing a mark of quality.

We will follow with interest the debate that emerges as Ofcom's consultations continue, and will welcome the opportunity to discuss more detailed proposals in future.

4.4 The scale of funding required

We acknowledge that any funding figures suggested at this stage will be notional, and that the extent to which the PSB content deficit has to be addressed will require much analysis and calculation. We are also aware that the sources from which the PSP is funded—whether from the licence fee, direct from the Treasury or from other sources, or a combination of these—is a matter for debate and consultation and that arguments representing all interests must be weighed carefully.

Rather than speculate at this stage on the sums or funding streams that might be involved in establishing and running the PSP, we would be interested in learning more about the purposes that Ofcom intends the PSP to serve. Again, we will welcome the opportunity to take part in future discussions on this point.

5. Conclusion

GMS is grateful for the opportunity to comment on public service broadcasting in the digital age and on the proposal for a Public Service Publisher. We note that the PSP would not be established until after the next PSB Review, and that much could change before then, but we are willing to participate in further consultations and discussions and

would like to be involved in shaping the future of public service broadcasting. Our overriding priority is to secure the future of the Gaelic Digital Service, and we recognise the importance of a body that will be a champion for public service broadcasting in an increasingly diverse and competitive digital media age.

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