

Dear Sir

BECTU notes with great interest the Terms of Reference document. We have a continuing close interest in the regulatory framework governing PSB and have responded in detail to previous PSB reviews and other relevant consultations (eg on 'A New Approach to Public Service Content in the Digital Media Age').

Our starting point in terms of the Second Review is that we are not convinced at this time of the need for significant reform of the PSB regulations. We retain a strong concern about commercial broadcasters' self-interested arguments for deregulation. We therefore believe it is vital that Ofcom subject any such arguments to close scrutiny rather than accepting them at face value. We are particularly concerned that ITV plc has timed its announcement of proposals to cut regional news services to coincide with the launch of the Second Review.

We have the following related questions and concerns:

- * We would like to request, in advance of the Review, a detailed Ofcom statement on the changes to PSB provision either authorised or noted since the conclusion of the last Review.
- * We would like to request publication of the criteria used by Ofcom to determine whether "taken together", PSB provision in a number of genres is of sufficient quantity and broad range.
- * We seek public access to the annual statements on PSB activity provided by broadcasters to Ofcom. We see no reason why (except for commercial confidential information) these should not be public documents.
- * We are seeking an explanation for the early timing of this Review, given the underlying requirement for 5 yearly reviews.

We have a close interest in the further progress of the Review process and look forward to participating in the consultative stages.

Yours sincerely

Gerry Morrissey
General Secretary