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3rd December 2008

Dear Mr Theodorou,

Response to Public Service Broadcasting consultation (phase 2)

LGcommunications is a national body made up of an association of councils that works to raise the standard of communications in local government. The association is endorsed by the Local Government Association (LGA) and the Improvement and Development Agency for local government (IDeA). Our objective is to promote best practice, to explore new innovations and drive excellence in local government communications.

We recognise some of the findings of the Ofcom research undertaken in phase one of its consultation. In our experience audiences place great importance on the provision of high quality public service information. Our membership's local audiences use a variety of media by which to access information and linear television remains an extremely important channel for accessing public service content. We also recognize Ofcom's findings that competition in the provision of information enhances impact.

Good governance at a local and national level needs to be supported and balanced by strong, effective public service information provision. It is essential to a healthy democracy that citizens understand their institutions and have access to information concerning local government via an impartial route they trust.

We have concerns that some of the proposals being put forward, especially in terms of the reduction to PSB regional output of ITV, will jeopardise the ability of all audiences, across different socio demographic groups, to access information about local government and undermine civic engagement. Research undertaken by some of our membership shows just how important regional broadcast is.

For example, according to a telephone survey undertaken by Westminster City Council in August 2008 a third of Londoners (33%) watched London Today/Tonight at least once in the last seven days. This is more than read the London paper (14%) or London Lite (18%) in the last seven days. The London wide survey was part of an evaluation of the Notting Hill Carnival and one in five Londoners (20%) said that they used London Today/Tonight to find out about events in London, which is more than those who use Time Out (17%).

This average is in-line with individual surveys undertaken by six different London Boroughs where between 29% and 52% of residents watched London Today/Tonight in the last seven days. In addition research undertaken across the country shows a similar picture. In Essex independent television news is viewed as a key source of

council information with ITV Anglia News being viewed regularly by 27% of people in the county and ITV London being watched by 21% of local people. In Derbyshire a recent survey of media habits has shown that 20% of local people watch ITV news Central (East or West) for news about their local authority.

Implementing a reduction to PSB for ITV's regional commitment would disproportionately affect the C2 DE social demographic audiences that prefer independent PSB provision to that provided by the BBC.

Hansard's Audit of Political Engagement 5 (2008) has found that 'only 15% of the public have presented their views to a locally elected representative in the last two or three years'. And as with other measures of engagement, those from higher social grades, with better education and those from white rather than ethnic minority groups, are disproportionately likely to have presented their views to a local councillor or local MP.

Reducing the PSB obligations of ITV may well have a detrimental effect in terms of information provision on the very audiences that we need to engage more with.

We therefore believe that reducing the ITV obligation to regional PSB may run contrary to the 'civic understanding' obligations of the Communications Act 2003 which states that broadcasting services must ensure that they:

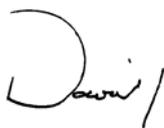
"... provide, to the extent that is appropriate for facilitating civic understanding and a fair and well-informed debate on news and current affairs, a comprehensive and authoritative coverage of news and current affairs in, and in the different parts of, the United Kingdom and from around the world."

Although we recognise that this review is being conducted in a time of great change and innovation in how people deliver and receive communications we believe the case for reduction of output via ITV has not been made in terms of its effects on public engagement and promotion of civic understanding. This should not be a decision made on a purely financial basis.

PSB output via strong regional broadcast channels is even more important with the current decline of effective local newspaper coverage. It has been estimated that Trinity Mirror alone has reduced its workforce by 1,200 jobs, closed 15 offices and 44 titles nationwide due partly to a downturn in advertising. Jeremy Dear the secretary of the National Union of Journalists estimates more than 500 journalists jobs in local newspaper companies, in print and online, have been either lost or left unfilled since June.

In this climate we consider the reduction of output via a popular and trusted channel of regional PSB could have significant detrimental effects on public engagement with local democracy. It is our view that regional media PSB output should be protected until there is incontrovertible evidence that other channels are sufficiently robust in terms of trust and use can take its place.

Yours sincerely



David Holdstock,
Chairman, LGcommunications