The Future of Digital Terrestrial Television. A response from the Campaign for Press & Broadcasting Freedom (CPBF)

The CPBF was established in 1979. We are an independent membership based organisation in the UK dealing with questions of freedom, diversity, and accountability in the UK. We draw our support from individuals, trade unions and community based organisations. We have developed policies for a more pluralistic media and regularly intervene in the public and political debates about the future of broadcasting in the UK.

In the past two months we have made submissions to Ofcom on the future of radio and the future of children's television programming and we plan to make a further submission on your draft annual plan for 2008/9. For a voluntary organisation of our size and resources, we are therefore very stretched to give this consultation the due weight of response that we feel is needed. This is not because we think the consultation is unimportant. On the contrary it is very important, but for us it is a matter of human resources. We know that Ofcom puts great store by its commitment to consult with 'stakeholders', but given the volume and limited response time we are at a disadvantage and not able to fully participate in this consultation. However, we would like to make a few general comments and have noted the submission from the National Union of Journalists 'Safeguarding Public Service Broadcasting on DTT'.

General Comments

Like the National Union of Journalists (NUJ) we believe that the UK has a good tradition of Public Service Broadcasting (PSB) which is rooted in both the public and private sector. No matter how positive the reputation of both private and public based PSB has been, both are currently under threat. ITV recently announced its intention to drastically reduce the regional news coverage it provides, which is a cornerstone of its PSB commitment. The BBC is also in the middle of a process which could result in thousands of staff being made redundant, affecting every area that the corporation operates in. Like the NUJ we also believe that it is imperative that PSB is guaranteed an equitable place at the heart of DTT in the future, no matter what shape it eventually turns out to have.

We welcome Ofcom's willingness to use intervention to ensure that DTT is developed in the most appropriate manner, and like the NUJ agree that 'not intervening in this case risks a worse outcome for citizens and consumers'. We also welcome Ofcom's recognition that 'there is an important public interest in the use of the capacity on the DTT platform and the capacity that can be created through this process. This public interest may not in all cases be perfectly aligned with the interests of the parties who would need to co-ordinate.'

We would also wish to support the proposals put forward by the NUJ under the section 'Ensuring Equitable PSB Presence' and emphasise our concerns that ITV has been allowed to relax its PSB commitments especially in regional programming. We continue to campaign along with the NUJ and others against any further loss of regional programming and local news. Ofcom needs to ensure that **positive regulation** is in place to protect the continued delivery of this programming.

Finally, despite the constraints outlined above, we will continue to do our best to monitor developments arising from this review and will continue to participate in the wider debate, always mindful that this review should not pre-empt the outcome of the future of PSB review starting later this spring.