

3i) Do you agree with Ofcom's assessment that television continues to have an essential role in delivering the purposes of public service broadcasting?:

Yes but the problem is that the internet is now challenging TV as a delivery mechanism for public service content and the regulatory, strategic and funding models for TV don't work for the internet.

3ii) Do you agree that UK-originated output is fundamental to the delivery of public service broadcasting purposes?:

No. The internet does not respect international boundaries. Wikipedia is public service content, is not UK originated and doesn't need public funding. Only in certain genres is UK origination important (e.g. children, regional news)

4i) Do you agree with Ofcom's conclusions about the way that other digital channels and interactive media contribute towards the public purposes?:

No. The conclusions are too focussed on defensively protecting TV as a model.

5i) Do you agree with Ofcom's assessment of the implications of different economic scenarios for the UK TV market for the future prospects for delivery of the public purposes?:

No. OFCOM is painting too gloomy a picture. TV companies need to reinvent themselves as cross platform media companies, rather than looking for public money.

5ii) Do you agree with Ofcom's analysis of the costs and benefits of PSB status?:

No. The problem seems to be primarily with ITV and I think they are pulling the wool over your eyes.

6i) Do you agree with Ofcom's vision for public service content?:

No.

6ii) How important are plurality and competition for quality in delivering the purposes of public service broadcasting, and in what areas?:

Pretty important. The BBC and Channel 4 both need strong competition in all areas.

6iii) In maximising reach and impact of public service content in the future, what roles can different platforms and services play?:

More and more public service content will be delivered on new platforms. But OFCOM's work is too content orientated. Invest in the platforms and infrastructure not in making more TV programmes.

6iv) Do you agree that the existing model for delivering public service broadcasting will not be sufficient to meet changing needs in future?:

No, I disagree. There's more than enough PS content to meet changing needs. It just needs to migrate to new platforms.

7i) What are your views of the high-level options for funding public service broadcasting in future?:

Don't spend more public money on content!

We don't need more content, or even new institutions!

Spend it on infrastructure and rights!

Don't top slice the licence fee. This will damage the supposed "cornerstone" of PSB, the BBC and won't result in more or better PSB content.

Option 4 seems like the Arts Council of the Airwaves/PSP option again and this has already been rejected.

7ii) Are the proposed tests of effectiveness for future models for public service broadcasting the right ones?:

No it's based on the wrong criteria.

We don't need new institutions or more regulation of them.

7iii) Of the four possible models for long term delivery of public service content, which, if any, do you consider the most appropriate and why? Are there any alternative models, or combination of models that could be more appropriate, and why?:

None of the options are particularly appealing, but if forced I would opt for Option 1 with the following extras:

a) change the remits of the existing PSBs so they can deliver them across all their digital channels and platforms

b) tax breaks/incentives for childrens programmes and for services that deliver them (e.g, broadband portals not just TV channels)

c) Public money put into building out the broadband network particularly in major

cities in the regions (far more important than spending public money on content and might help regional news)

d) OFCOM to lead on negotiating a new more relaxed rights framework so that PSB content stuck in archives can be released more easily

e) "Incentivising openness" - OFCOM to find ways of encouraging sharing of techniques and ideas across the sector

f) look again at the public money being spent by government in this area - bring all that money together - could it be spent better?

8i) What do you think is the appropriate public service role for Channel 4 in the short, medium and long term? What do you think of Channel 4's proposed vision?:

Channel 4's vision may be a public relations triumph but as strategy I find it backward looking and closed. They are trying to protect a broken model (TV) instead of working out how to succeed on the internet. Turning themselves into a mini BBC won't promote plurality or competition in general and won't encourage creativity. It will simply lead to more bureaucracy and public money being wasted.

If they can afford to spend £50 million on 4iP (4iP is a good idea) then I'm sceptical about their supposed funding gap.

8ii) Which of the options set out for the commercial PSBs do you favour?:

There seems to be no problem with channel 5.

ITV's remit can be tweaked so that they deliver it across all platforms.

9i) To what extent do you agree with Ofcom's assessment of the likely future long term issues as they apply to the nations, regions and localities of the UK?:

Seems reasonable.

9ii) Which model(s) do you think will be most appropriate in each of the nations and in the English regions in the long term, and why?:

The most difficult part of the work to find a solution too.

The answer may lie in cooperation between ITV, the BBC and local newspapers

9iii) What are your views on short/medium-term issues referred to, including the out-of-London network production quotas?:

No opinion other than ITV should not be allowed to get away with further relaxation of the quotas.

9iv) What are your initial views on the preliminary options set out relating to ITV plc's regional news proposal? (Please note that Ofcom will put forward firm options on these issues, and consult also on ITV plc's regional news proposal, in phase 2 of this Review.):

Don't allow ITV to further reduce its commitments. Let it serve up regional programmes on ITV TWO etc.

10i) Do you agree with our assessment of the possible short term options available relating to children's programming:

No.

It is disingenuous (to say the least) of OFCOM to say that childrens programming is "very unprofitable now" when no hard data is given and the evidence I can find elsewhere does not support this.

CITV is profitable now.

This is not evidence based policy making!

See this post on my personal blog:

<http://nickreynoldsatwork.wordpress.com/2008/04/17/ofcom-public-service-review-1-a-kangaroo-for-children/>

11i) Do you agree that new legislation will need to be in place by 2011 in order to ensure continued delivery of the public purposes in the medium and long term?:

No (except if primary legislation is needed to extend the PSB's remits across all channels and platforms). See my answer at 7 iii above.

Comments: