



Question	Your response
<p>Question 1: Do you agree that a new regulatory framework for Public Service Media (PSM) delivery should support a more flexible ‘service neutral’ delivery approach that is more outcomes focused?</p>	<p>No. The current PSB system works well and needs bolstered rather than radically reformed. The existing PSB institutions are essential to the UK production and broadcast landscape due to their size and reach. They have evolved with public service values at the heart of their content and approach to business, rather than being driven by solely commercial interests. Ofcom has itself highlighted the importance of a distinctive public service offer - ‘Service neutral’ is likely to dilute the existing offer.</p>
<p>Question 2: Do you agree with our proposals for a clear accountability framework?</p>	<p>While an accountability framework is essential, it should include qualitative and quantitative quotas based around content, rather than relating to where the content is shown. There should be clear and real measurable obligations on broadcasters for public service content imposed and monitored by the regulator.</p> <p>Children’s TV is an example of how lack of clarity around accountability and prominence can have severe detrimental impact.</p> <p>The removal of children’s programming quotas for commercial public service broadcasters, and restrictions on advertising around children’s television, created market failure.</p> <p>PSBs spent roughly 40% less than they did in 2006 by 2017 (down from £116million to £70 million). 98% of children’s programming in 2016 was repeats with BBC accounting for 87% of all first-run originated children’s programming by public service broadcasters. The huge role played by the BBC up until this point demonstrates the value of regulation.</p> <p>Removal of much children and teen content from the main PSB linear platforms and placed on bespoke digital channels (eg CBeebies, CBBC, CITV) or as an online only offer (BBC3) has also led to a lack of prominence of these specialist and important PSB services – out of sight, out of mind? The proposed return of BBC3 to a prominent linear platform is welcomed.</p> <p>Content is key and quotas of hours, spend and genre laid out for different audience segments should be considered. Linear and VOD roll out</p>

	<p>should be acknowledged, and flexibility built in, but the primary argument should be what, not where.</p> <p>Public Service Broadcasters should adhere to high standards of transparency of tariffs, deal making with suppliers, diversity standards and Albert certification, as well as provision of high quality PS programmes within the context of the territory. They should be distinctive in all regards.</p> <p>Support for prominence of PSBs is needed, and linear schedule EPG prominence of PSB mirrored on carriage services and connected TVs.</p>
<p>Question 3: What do you think should be included in the PSM 'offer'?</p>	<p>PSM should be values driven – providing content that educates and informs, as well as entertains and reflects the whole of the UK and its culture and society – content that shows us who we are and how to be. News and Children’s content should be prioritised.</p> <p>Content should be free to access for all – universality is key to PSM.</p> <p>There should be both a Linear and VOD offer. The return of BBC3 to a linear platform reveals that VOD only is not the way forward. VOD only and widespread use of algorithms that supply ‘more of the same’ programmes is counterintuitive to the aims of PS broadcast in supplying and promoting a broad range of content to the audience.</p>
<p>Question 4: What options do you think we should consider on the terms of PSM availability?</p>	<p>PSM should continue to be free to access for all audiences. Since universality is crucial in terms of PSM, availability across linear and VOD platforms is essential.</p>
<p>Question 5: What are the options for future funding of PSM and are there lessons we can learn from other countries’ approaches?</p>	<p>I advocate maintaining the current approach, but with more detailed regulation and better resource.</p> <p>At the last review of the BBC licence fee it was concluded that the BBC licence fee, while not perfect, is the least worst option to sustaining the BBC - our most recognisable of UK brands, its variety and quality of public service output and its global reputation and soft power. The pandemic has evidenced the value of this service, via communicating important public health messaging, fair and impartial news</p>

	<p>services and supporting education via Bitesize moving to a television format first on iPlayer but now also on linear services.</p> <p>Commercial PSB's seem to be bouncing back following the pandemic but support is needed. The impact of restrictions on HFSS around children's content has contributed to the decline in this sector, and has achieved little in the way of curbing childhood obesity. The recent introduction of broader, pre-watershed restrictions will likely impact only on revenue and content budgets and not on obesity.</p> <p>There is a strong argument for implementing measures that create an even playing field for PSB and other media providers in the territory. The streamers are not regulated, pay minimal tax despite having grown subscribers in the UK during the pandemic, but are major beneficiaries of UK tax credits for High End TV. They are putting more work in the UK, but also filling up studio space, booking crew at the top end of rate cards, often to the detriment of PS productions competing for the same studio space and crew.</p> <p>Again, Children's television offers some lessons. Lack of regulation, prominence and resource led to a profound market failure. The introduction of DCMS supported Young Audiences Content Fund was intended to address this, and is beginning to broaden the provision of content for children and young people on the commercial PSBs. It is a help, but not the whole answer to market failure. Further regulation and resource are needed.</p>
<p>Question 6: What do you think about the opportunities for collaboration we have referred to? Are there other opportunities or barriers we haven't identified?</p>	<p>The status quo should be maintained to preserve editorial independence and distinctiveness within the current UK PS landscape. PSB is currently at the extent of collaboration that is feasible to maintain a truly distinctive and plural PS offer.</p>
<p>Question 7: What are your views on the opportunities for new providers of PSM?</p>	<p>More providers equates to more audience fragmentation and risks diluting the PSB offer. As noted above, PSBs are distinctive in that their values are all about the public interest, and because of that, provide a real choice to audiences and are a clear alternative to</p>

platforms with more commercial imperatives. Putting PSB content on commercial platforms eg BBC output on Netflix, has largely been to the detriment of the PSB in the long term, with many of these shows being attributed as 'Netflix shows' by the public even though they were licence fee funded.

Enders Analysis recent evaluation on the difference between PS content and 'World TV' should be noted. Truly local content should be preserved and protected. It is our cultural and societal glue and that should continue to be represented and reflected back to audiences across the UK and the world.