

Title:

Mr

Forename:

William Kenneth

Surname:

Gunn

Representing:

Self

Organisation (if applicable):**Email:****What additional details do you want to keep confidential? :**

No

If you want part of your response kept confidential, which parts? :**Ofcom may publish a response summary:**

Yes

I confirm that I have read the declaration:

Yes

Additional comments:

I have already been in touch with the Department for Culture, Media and sport and it was Dempster Marples from Maria Millar's department who suggested that I submit my serious concerns to Ofcom too especially since your consultation on the future of broadcasting in the former Border Television area is about to close. The points I list below may not be exactly what you are looking for but they represent the feelings of the viewers in the Scottish Borders and not the politicians or the television companies. We were possibly the first "cable area" in the UK as Border Counties Relay piped television pictures into almost every home in the area to compensate for the topography that meant transmitted signals could not reach us. We began with BBC when it only had one station and with Scottish Television. Later as other broadcasters developed Border came along and we had two ITV stations. When Channel 4 opened the capacity of the cable system was overstretched and the relay company were ordered to close STV and have only Border. The relay company closed soon after as most

folk had kept it simply because the preferred Scottish Television with its Scottish news and Scottish sport. It is not true to say we have never had STV. We started our ITV experience with STV long before Border was thought up. It is inconceivable, leading up to once in 300 years referendum that we are being denied ITV broadcasting from our own country.

Question 1: Do you agree that the overall valuation methodology remains appropriate for the determination of the PQR and cash bid element of the renewed licences? If you do not, please explain why you view that methodology as inappropriate and what justifications exist for suggested alternatives.:

N/A

Question 2: Are there any other rights, obligations or regulations associated with the Channel 3 and Channel 5 licences that we should consider, or any other factors that may affect the valuation? If so, please explain how we should take them into account and provide any relevant data or analysis to support your suggestion.:

The viewers in the former Border TV areas of Scotland are currently denied a proper news service or current affairs input associated with their area and demand an input which allows us to be the same as the rest of Scotland. It is not just that we cannot get Scottish News and Current affairs from Edinburgh, Aberdeen, Inverness or Glasgow but the rest of the population of Scotland cannot see or hear what we are doing in this important area of Scotland that is the Scottish Borders and Dumfries and Galloway

Question 3: Do you agree with Ofcom's proposed approach to valuing the rights associated with the Channel 3 and Channel 5 licences as outlined above? If not, please explain why and what alternative approaches would be available (providing any relevant data to support your alternative view). In particular, how should we value the right to appropriate EPG prominence to a new entrant (please provide relevant data to support your response)?:

I don't believe that the latter part (about the rest of Scotland not knowing about the Borders and greater Southern Uplands of Scotland) has even been thought through by Ofcom. The only thing that seems to matter is cost and if that is the yardstick then it is flawed. We in the Scottish Borders have the same rights as viewers in the rest of Scotland to watch our national news but have been denied that right by ITV ever since the erroneously named Border Television started broadcasting in the 1960s from Carlisle which is not in the Borders or in Scotland.

Question 4: Do you agree with this approach to assessing the opportunity cost associated with PSB programming obligations? If not, please explain why and what alternative approaches would be available (providing any relevant data to support your alternative view):

I don't agree with this one little bit. As I say above viewers in southern Scotland are as entitled to their own Scottish news, surely, as the rest of the Scottish nation. If we are not then we must be second-class citizens. A local opt-out service was never the way forward as once again the rest of our nation knew nought of what we were doing or what was our interests. Border was badly conceived in 1960 but now we get "local news" from Gateshead, south of Newcastle which includes roads reports about such places as North Yorkshire and Scotch Corner (not in Scotland).

Question 5: Do you agree that we should take into account the extra restrictions on advertising that apply to PSB licence holders alongside the right to appropriate EPG prominence? If not, what alternative approaches are available? What data or evidence exists to indicate the effect on advertising impacts or revenue of the advertising minutage restrictions on the Channel 3 or Channel 5 licences? :

N/A

Question 6: Do you agree with Ofcom's approach to dealing with the uncertainties outlined above? If not, please explain why and what alternative approaches would be available? Please provide any relevant data or analysis that could assist Ofcom. :

N/A

Question 7: Do you agree that a real, pre-tax discount rate of 9.2% is appropriate? If not, then please set out what other considerations Ofcom should have in determining the discount rate:

N/A